



August 28, 2017

Mr. Hiller West, Director  
Island County Community Planning Department  
P.O. Box 5000  
Coupeville, WA 98239

RE: Island County Application No. CPA 252/17  
City of Oak Harbor Comments

Dear Mr. West,

Enclosed with this letter are the City of Oak Harbor's preliminary, formal comments on the Wright's Crossing proposal (CPA 252/17) to expand the Oak Harbor Urban Growth Area. These comments are intended to respond to the Formal Comments portion of Section XVIII of the Comprehensive Plan Amendment Application, Part 3. We understand that a Resolution of Support must also be submitted and will work to meet the timeline conveyed to us by Island County staff.

For your information, the City has assigned this application the permit number of PLN-17-00006.

Please do not hesitate to contact me should you have any questions regarding our comments. I may be reached at (360) 279-4511 or at [spowers@oakharbor.org](mailto:spowers@oakharbor.org).

Sincerely,

Steve Powers, AICP  
Director, Development Services  
[spowers@oakharbor.org](mailto:spowers@oakharbor.org)

cc: Ms. Beverly Mesa-Zendt, Island County  
Ms. Beckye Frey, Island County  
Mr. Douglas A. Merriman, City Administrator  
Mr. Cac Kamak, Senior Planner  
File

Enclosure: City of Oak Harbor Comments on CPA 252/17

**Part 3 – Section XVIII(1), Municipal Comments and Local Data Requirements**

The municipal comments shall include the following information:

**1. How the proposal is or is not consistent with the goals and visions of the municipal Comprehensive Plan**

The Oak Harbor Comprehensive Plan meets the Growth Management Act requirements for a comprehensive plan by planning for a specific urban growth area (UGA). Since the current proposal is for an UGA expansion, it quite naturally falls outside of the area covered by the existing Comprehensive Plan. City comments related to the application’s consistency or inconsistency with our Comprehensive Plan can only be offered from a general perspective at this time.

Urban Growth Area Goals and Policies

The Comprehensive Plan addresses the general topic of Urban Growth Area (UGA) expansion in a number of locations, through a variety of chapters, goals and policies. Any specific proposal such as the Wright’s Crossing application would be reviewed, at a minimum, against these goals and policies should the proposal advance through the review process. Several of the applicable goals and policies are shown below.

Chapter 10, Urban Growth Area, is the chapter of the Comprehensive Plan that most directly addresses potential expansions of the UGA. Goals and policies from that Chapter relevant to this commentary are:

- Goal 1            Support and encourage urban uses and densities to occur within the UGA boundaries.
  - Policy 1.b        Ensure that sufficient land in the UGA is available to provide reasonable development opportunities to accommodate twenty years of population and employment growth.
  
- Goal 2            Engage the County cooperatively in determining expansions to the UGA boundary in accordance with the County Wide Planning Policies.
  - Policy 2.a        The UGA boundary expansion may be activated by a proposal from either the City or County. Both governments must agree on the boundary as required by the Washington State Growth Management Act.
  - Policy 2.b        Base proposed expansion of the UGA on the percentage of developable land existing within the UGA as determined by the City Council as well as changes in the city of amendments to the Comprehensive Plan.
  
- Goal 3            The City and County shall adopt inter-jurisdictional cooperation policies regarding land within and surrounding the UGA.
  - Policy 3.a        Joint planning should identify, in advance, the priority areas of future boundary expansion.
  - Policy 3.b        Ensure regional growth capacity issues are part of the consideration of the boundary expansion by the City and County.

Chapter 3, Land Use, includes policy statements pertaining to the designation of new lands within a UGA and supporting the creation of affordable housing opportunities in appropriate circumstances.

- Goal 1 Promote a healthy mix of uses.
- Policy 1.i. Designate areas newly incorporated into the UGA as special planning areas to:
1. Explore the best mix of land uses to serve the area and the city's needs;
  2. Work with property owners in the area to determine land use patterns and development scenarios;
  3. Involve public participation.
- Goal 4 Promote a diverse and affordable housing stock
- Policy 4.a. Maintain a healthy amount of developable and redevelopable land in all residential land use categories.
- Policy 4.e. Support flexible standards for developments that provide affordable housing.
- Policy 4.g. Coordinate housing growth strategies with changes in school enrollment projections and NAS Whidbey expansions.
- Policy 4.h. Support efforts to increase affordable housing in the City.

#### Other Comprehensive Plan Statements

The Land Use Chapter includes a 'Twenty-Year Land Use Needs' section. This section summarizes Island County's and the City's efforts to determine a population project for 2036 (25,814) and determine whether sufficient development capacity is present within the existing UGA to accommodate it. It concludes with the statement that sufficient capacity exists per the 2015 Buildable Lands Analysis conducted by Island County.

Within the *Opportunities and Challenges* portion of the Land Use chapter the following statements are found:

- Meeting growth needs – Oak Harbor is constantly faced with the dynamic nature of NAS Whidbey and its changes. Increase in squadrons over the next few years will increase the demand for housing, schools and other services. Although, the Buildable Lands Analysis indicates sufficient land capacity within Oak Harbor, it is hard to predict whether the availability will be able to match the trend of incoming squadrons. The City will continue to support private development proposals and expansion of public facilities such as schools, colleges and other services as they come forward
- The most logical expansion of the Urban Growth Area would include the Fort Nugent neighborhood.

Chapter 2, Oak Harbor Profile and Projections, provides background data on Oak Harbor as a community. The *Findings* section of this chapter includes the following statement: "The high demand for affordable housing is potentially due to property values increasing at a faster rate than increases in income and housing allowances for Navy personnel."

Countywide Planning Policies and the Joint Planning Area

It is appropriate to comment on the application in the context of the Joint Planning Area (JPA). The concept of a JPA is briefly addressed in the Comprehensive Plan in the Chapter 5, Parks, Recreation and Open Space Element and its boundaries are shown on a map in Chapter 10, Urban Growth Area. The topic of the JPA is more fully addressed in the recently adopted Countywide Planning Policies.

The City of Oak Harbor City Council formally requested Island County consider expanding the Joint Planning Area boundary through the adoption of Resolution No. 17-13. That resolution identified an area for possible expansion to the south and southwest of the existing JPA; the proposed application falls within that area. Staff notes that the City and the County are engaged in a process to study the existing Joint Planning Area boundaries to determine how they might be modified.

Summary Statement

As was noted earlier, since the current proposal is for an UGA expansion, it quite naturally falls outside of the area covered by the existing Comprehensive Plan. City comments related to the application's consistency or inconsistency with our Comprehensive Plan can only be offered from a general perspective at this time. Due to that fact, at this time the proposal cannot be deemed consistent nor inconsistent with the goals and visions of the Oak Harbor Comprehensive Plan. A more detailed review of the proposal is necessary before such a conclusion can be reached.

**2. A summary of alternative measures considered to accommodate growth through infill and redevelopment within existing municipal boundaries, per WAC 365-196-310(3)(f) and CWPP 3.3.5,**

Unfortunately, given the timing of the submittal of this application the City has not had the opportunity to undertake an alternative measures analysis in advance of the August 28<sup>th</sup> comment deadline. Should this application be docketed the City will evaluate alternative measures, and in compliance with CWPP 3.3.5, discuss their viability with the County.

**3. Comments on the potential location of the UGA boundary revisions,**

The City does not have any adopted documents that address the proposed location for this UGA expansion. However, the City has long discussed publicly the unique geography of its UGA and how that geography will direct any future JPA and UGA expansion conversations. Lands located to the north and east of Oak Harbor's UGA are either federal properties or unsuitable for UGA expansion because of concerns over encroaching on NASWI operations. Expansion to the southeast is not possible due to the presence of Oak Harbor (the water body). Expansion to the west is possible for those areas not substantially constrained by critical areas or protected by conservation easements. By process of elimination, this leaves other expansion opportunities most likely to occur to the south and southwest of the existing UGA.

As was noted above, the City of Oak Harbor City Council formally requested Island County consider expanding the Joint Planning Area boundary through the adoption of Resolution No. 17-13. That resolution identified an area for possible expansion to the south and southwest of the existing JPA; the proposed application falls within that area. Staff notes that the City and the County are engaged in a process to study the existing Joint Planning Area boundaries to determine how they might be modified.

**4. The feasibility of providing urban governmental services to the proposed location, per RCW 36.70A.030(18), and impacts to Capital Improvement Plans and/or Transportation Improvement Plans, and**

The City’s current Capital Improvement Program (CIP) contains projects that fall within the city limits of Oak Harbor. The utility comprehensive plans that identify the projects included in the CIP (water, sewer, storm drainage and transportation) have analyzed the long-range infrastructure needs of the community and recommended projects within the city limits and UGA<sup>1</sup>. These long range planning efforts are based on the current boundaries of the UGA and will need to be updated to reflect any expansions of the UGA. These updates will lead to the identification of the projects necessary to serve the proposed area. Additional, project specific analysis is also necessary to fully address this question.

Transportation impacts are more difficult to estimate without the benefit of a transportation impact analysis. Review of transportation impacts will of course need to include coordination with WSDOT given the presence of SR-20 adjacent to the proposed site. Improvements to SR-20 may be necessary adjacent to the site or at other key locations (such as the intersection of SR-20 and Swantown Avenue).

The Comprehensive Plan has goals and policies (especially within the Utilities and Urban Growth Area Chapters) that require proposed annexations to meet their infrastructure needs without reducing the City’s level of service standards. Any future annexation request that may be associated with the UGA expansion proposal will be evaluated against these goals and policies.

**5. Attach a summary of public participation conducted related to this proposal (notices sent, etc.).**

**a. Public Hearing Date(s):**

**b. Resolution Adoption Date (actual or scheduled):**

The following is the City’s tentative schedule for the public participation process for this proposal:

<b>Date</b>	<b>Legislative Body</b>	<b>Meeting Goal</b>
9/19/17	City Council (regular)	<ul style="list-style-type: none"> <li>•Brief Council on application, staff comments and analysis to date</li> <li>•Accept public comment</li> </ul>
9/26/17	Planning Commission (regular)	<ul style="list-style-type: none"> <li>•Brief Commission on application, staff comments and analysis to date</li> <li>•Conduct public hearing</li> <li>•Accept public comment</li> <li>•Request Commission recommendation to City Council</li> </ul>
9/27/17	City Council (workshop)	<ul style="list-style-type: none"> <li>•Brief Council on application, staff comments and analysis to date</li> <li>•Share Planning Commission’s recommendation</li> <li>•Recommend Council accept public comment</li> </ul>
10/3/17	City Council (regular)	<ul style="list-style-type: none"> <li>•City Council considers application and Planning Commission’s recommendation</li> </ul>

<sup>1</sup> In addition, the Transportation Plan also depicts some projects outside of the current UGA boundaries, in areas where the City determined it was beneficial to undertake long range planning.

Date	Legislative Body	Meeting Goal
		<ul style="list-style-type: none"> <li>•Conduct public hearing</li> <li>•Accept public comment</li> <li>•City Council action on resolution</li> </ul>
10/17/17 (if reqd.)	City Council (regular)	<ul style="list-style-type: none"> <li>•City Council considers application and Planning Commission's recommendation</li> <li>•Conduct public hearing</li> <li>•Accept public comment</li> <li>•City Council action on resolution</li> </ul>

Public notification will include the City's standard newspaper advertisements, posting notices within City Hall and on the City's website and advertising on TV 10. Notices will be direct mailed to properties within the proposed UGA expansion area and for those properties between the proposed UGA expansion and the boundary of the existing UGA.

**6. Additional City Comments**

**Review Process**

As required by the Growth Management Act, Island County and the City of Oak Harbor have jointly adopted Countywide Planning Policies (CWPP). The City's original adoption occurred on February 16, 2016 through Resolution 16-07, with amendments adopted on July 26, 2017 via Resolution No. 17-13. The CWPP provide a policy framework for a number of planning topics of mutual interest, including how joint planning areas are designated, the process for considering urban growth area expansions and the methodology for conducting a buildable lands analysis. The City recognizes these policies as governing the review of the subject application. It is understood that the proposal lies outside of the existing JPA and that an amendment to the JPA (to include the proposed project area) is a necessary precursor to the proposal being considered under the CWPP.

The City also recognizes that a review of a project of this magnitude is no small undertaking and requires a significant commitment of staff resources. It also requires that sufficient time be allocated to conduct a meaningful public participation process. The City is committed to working collaboratively with Island County in the processing of this application.