

Comments on Skagit County Comprehensive Plan Housing, Land Use, and Economic Development Elements

Submitted on behalf of Skagit Land Trust by Molly Doran, Executive Director; 1020 S 3rd Street, Mount Vernon, WA 98273

Thank you for the opportunity to comment on preliminary policy revisions to the Skagit County Comprehensive Plan Housing, Land Use, and Economic Development Elements.

Skagit Land Trust conserves wildlife habitat, agricultural and forest lands, scenic open space, wetlands, and shorelines for the benefit of our community and as a legacy for future generations. Our organization has over 1,700 family and business supporters (members) and 400 active volunteers who work to protect the most important and beloved places in Skagit County. Today, the Trust protects more than 10,000 acres, including more than 48 miles of shoreline.

Our comments draw from this mission and seek to ensure that the Skagit County Comprehensive Plan works to maintain the resilience of Skagit County's natural environment in the face of population growth and the impacts of climate change.

General Comments Regarding Housing, Land Use and Economic Development

Skagit Land Trust (the Trust) strongly supports efforts to increase affordable housing in Skagit County. The primary method for doing so should be to encourage growth in cities and towns, by making them highly livable, walkable, and desirable places to live, and by partnering with non-profit housing organizations and the private sector to offer a wide variety of affordable housing options.

The Trust supports amending the Countywide Planning Policies (CPPs) to encourage 90 percent of new residential growth to occur in the cities and their UGAs, rather than the current goal of 80 percent.

We do not believe the County should be looking at ways to increase development potential in the rural area, even if these increases are limited to Rural Villages and Rural Intermediate areas. The County and cities do not consistently achieve the CPP goal of 80 percent of new growth occurring in urban areas; increasing rural development potential would move us further from that goal.

Furthermore, with climate change, many of the factors that used to dictate where growth and development should go must be updated with greater emphasis on natural hazards and limited resources. Thus, things such as water supply, single source aquifers, flood plain hazards, forest fire hazards, erosion, landslides, and transportation routes in floodplains all need to be considered.

We believe there should be strong goals and policies in the Land Use Element that seek to avoid putting new development, whether through UGA expansions or the siting of potentially hazardous energy facilities, in hazardous or risk-prone areas.

Specifically, in regard to especially hazardous energy facilities, we would like to see a policy concerning the siting of energy infrastructure either in Land Use, or Utilities, or both, wherever it is better suited.

Siting of Energy Infrastructure

New energy infrastructure facilities, such as substations and BESSs, should only be allowed in climate resilient locations. These facilities should not be built in floodplains (or areas likely to become floodplains over time due to climate change) where spills or fires could contaminate waterways, nor close to forests to which fire could spread. They also should not be built in close proximity to residential areas where people would be in jeopardy from toxic gases and possibly be affected by prolonged loud noise from the fans needed to continuously cool the lithium-ion batteries.

While BESSs will be increasingly important as we rely more on wind and solar power, there's no perfect place to site them. Commercial and industrial areas out of the floodplain and away from residential areas would seem to be best. They do need to be adjacent to large substations, which severely limits the choices. But rather than building very expensive new energy facilities next to existing substations in high-risk locations, there should be planning to move substations to more suitable locations that carry fewer risks to human and environmental health.

To facilitate implementation of these goals and policies, the County should create a base map of the areas most vulnerable to climate change as part of the Comprehensive Plan Supplemental Map section. This should include sea level rise, river flooding, excessive fire danger, geologic hazard areas (landslides, alluvial fans, erosion areas), areas with infrastructure hazards/potential failure that will be at increased risk with climate changes.

Following are more specific comments on proposed amendments to goals and policies already in the Comprehensive Plan.

Housing Element

Goal 7C, Housing Distribution and Accessibility

While we support efforts to increase the variety of housing types in urban and rural areas, in an effort to make housing more accessible and more affordable, we do not support actions that increase densities in Rural Villages, other LAMIRDs, or the rural area generally. Additional density should only be added in cities and towns.

Policy 7C-1.3

Again, efforts should be made to make housing in LAMIRDs more accessible and affordable, without increasing rural residential densities.

Land Use Element

The land trust supports the following goals and policies regarding urban growth and urban growth areas:

- **Work with cities and towns to help them plan for and absorb more people, homes, and businesses.** Modify the population distribution goal so that 90% of new population growth is in urban areas (rather than the current 80% goal).

- **Encourage 20-minute neighborhoods.** 20-minute neighborhoods are places where residents have easy, convenient access to many of the places and services they use daily including grocery stores, restaurants, schools, and parks, without relying heavily on cars. Increasing the walkability of neighborhoods will reduce the county's carbon output.
- **Focus strongly on keeping growth in urban areas and making those urban areas livable.**
 - Establish high thresholds for when cities and towns are allowed to expand their Urban Growth Areas (UGAs).
 - Do not allow UGAs to expand into floodplain or critical areas.
 - Have programs that purchase development rights around UGAs to contain development and provide green spaces, parks, and trails. Green spaces will also help absorb storm waters and keep urban areas cooler.
 - Stop sprawl by outlawing Fully Contained Communities (FCC) in rural areas. FCCs increase GHG emissions as they contribute to increased vehicle use.

Goal 2-B, Open Space

We would like to see the following policies added under Goal 2-B, regarding Open Space.

- **Develop systems to preserve forests, wetlands, water and soils for natural carbon storage** as a way to reduce carbon emissions in the County.
 - Identify carbon sequestration as a compatible forestry practice for Open Space taxation.
 - Allow increased carbon storage (bio-char, etc.), including through mitigation programs, as compatible agricultural land uses for Open Space taxation.
- **Focus on connecting green spaces and wildlife corridors so wildlife can move freely as their habitat changes or is lost.**

New Policy Following Policy 2G-1.1

We would like to see a new policy, similar to Policy 2G-1.1 regarding conservation land divisions on Ag-RNL and Rural Resource-NRL, to facilitate conservation land divisions on Rural lands, including Rural Reserve and Rural Intermediate. The rationale is exactly the same as for the conservation policy related to the two resource lands mentioned above.

This would allow professional conservation organizations or government entities to purchase part of a property from a voluntary landowner for strict conservation purposes without going through the current arduous and expensive subdivision process. A conservation easement would be placed on the land purchased to ensure it was not developed. This is a win-win for adapting to climate change and for landowners who often want to keep the productive parts of their land, or move their home to a resilient location, but do not want to manage sensitive or increasingly hazardous excess acreage.

Economic Development Element

Policy 11A-4.2

EDASC is now the Economic Development Alliance of Skagit County, not Association. The policy should be corrected.

Goal 11E, Quality of Life

We object to the proposed removal of the words “sustainable natural resource industry,” “valued open space” and “environmental quality” from the goal relating to Skagit County’s quality of life. These are extremely valuable aspects of Skagit County’s quality of life that are emphasized by the public in the County’s own public opinion surveys related to the Comprehensive Plan update.

We propose adding the following new policies to the Economic Development Element:

- Develop additional trails to attract recreationists and eco-tourists (such as birders) increasing the county’s tourist economy without increasing the carbon footprint. Eco-tourism contributes over \$20 billion and growing to Washington’s GDP. Skagit County is uniquely positioned to capitalize on this trend with more tourist infrastructure such as trails and wildlife viewing sites.
- Consider boosting the County's eco-tourism economy by promoting the County's dikes as walking, bicycling, bird/wildlife watching paths.
- Encourage smaller “truck” farms on the edges of cities and towns through zoning incentives.

Thank you again for the opportunity to comment on preliminary policy revisions to the Skagit County Comprehensive Plan Housing, Land Use, and Economic Development Elements.

Sincerely,

Molly Doran
Executive Director
Skagit Land Trust