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AFTER RECORDING RETURN TO:
SKAGIT COUNTY HEARING EXAMINER
302 SOUTH FIRST STREET
MOUNT VERNON, WA 98273

DOCUMENT TITLE: Order on Special Use Permit Request SU 01 0777

HEARING OFFICER: SKAGIT COUNTY HEARING EXAMINER

APPLICANT: Secret Harbor School

ASSESSOR PARCEL NO: P31208

ABBREVIATED LEGAL DESCRIPTION: The proposed project is located in the southeast corner of Cypress Island; Lots 1,2, & 3 of Short Plat #127-78, a portion of Government Lot 4; within the SE $\frac{1}{4}$ of the NW $\frac{1}{4}$ of Section 04, Township 35 North, Range 01 East, W.M., Skagit County, WA.

BEFORE THE SKAGIT COUNTY HEARING EXAMINER

FINDINGS, CONCLUSIONS AND DECISION

Applicant: Secret Harbor School
c/o Judy Grosvenor
1809 Commercial Avenue
Anacortes, WA 98221

File No: PL01-0777

Request: Special Use Permit

Location: Deepwater Ranch at the southeast end of Cypress Island;
Lots 1,2,&3 of Short Plat #127-78, within a portion of
Gov Lot 4, SE1/4NW1/4, Sec. 4, T35N, R1E, WM.

Summary of Proposal: To establish a group care facility on a 15-acre site,
adjacent to an existing non-profit school and residential
treatment center. The new group care facility will
use existing structures, with slight modifications.
An additional dormitory will be built for the students'
residence, and for staff. A separate staff bunkhouse is
proposed for some time in the future

Land Use Designation: Rural Reserve

Public Hearing: After reviewing the report of the Planning and Permit
Center, the Hearing Examiner conducted a public hearing
on May 22, 2002.

Decision: The application is approved, subject to conditions.

FINDINGS OF FACT

1. Secret Harbor School (applicant) seeks to install a new group care facility (Deepwater Ranch) near its existing school and residential treatment center on the south end of Cypress Island.

2. The Deepwater Ranch property consists of three lots created by a short plat in 1978. They are Lots 1, 2, & 3 of Short Plat #127-78, within a portion of Gov. Lot 4, SE 1/4Nw1/4, Sec. 4, T35N, R1E, WM. The area, which the applicant is in the process of purchasing, is approximately 15 acres in size. It adjoins an additional 112 acres already owned by the applicant. About 5 acres of the adjoining land is developed as a private human service agency with both school and residential facilities.

3. Cypress Island is not served by public ferries, has no public road system, and is not connected to generally available public utilities. Utility services for the school and for the planned new facilities must be provided privately by the applicant. Access to the site is by private boat.

4. The existing school and residential facility is a legal non-conforming use that serves at-risk adolescent boys. It currently occupies a campus of rustic buildings that are provided with appropriate utilities. The school campus has existed at this location for 53 years. The new Deepwater Ranch facility will operate in conjunction with the existing school and will result in a split-up of the population. It will not increase the number of boys served.

5. The property to be used for the new group care facility is already developed with a single-family residence, chapel, greenhouse, and several outbuildings. The land slopes gently toward the waters of Secret Harbor and Deepwater Bay. On-site sewage treatment facilities and a private water supply serve the property.

6. The Deepwater Ranch group care facility will operate as a residential treatment program for up to 12 boys, aged 11 through 17. It will be a year-round operation, with up to eight employees on site at any one time.

7. The new facility will use both existing structures and newly constructed buildings. The existing residence will house up to two staff members (cook/housekeeper and groundskeeper/maintenance person). Extra bedrooms will be converted to office space for use by counselors or other staff. The residence will also provide the dining area for resident students. Minor remodeling of the residence will be undertaken to accommodate the new use.



8. Outbuildings on the Deepwater Ranch site (shop, greenhouse, barn/storage building, chapel, shed) will be used as part of the daily programming for the group home. No structural alterations in them is planned.

9. A new dormitory, approximately 3,500 square feet in size, and including a daylight basement, will be constructed southeast of the residence. The dormitory will be the residence for up to 12 students. It will contain eight single rooms and two double rooms, plus a staff office, lavatories, living space, laundry, and mechanical spaces. The architecture and exterior will be designed to be compatible with the residence.

10. The new dormitory will be connected to a new septic/drainage system. If possible, the existing residence will continue to use the existing septic/drainage system. If commercial kitchen requirements dictate a new system, the residence will probably be included in the design for the septic system serving the dormitory.

11. The Deepwater Ranch site currently has three water wells in place, one of which serves the residence. For this project, it is proposed that another well, located in the southern part of Lot 2, be tested and developed to serve the dormitory. The applicant will install whatever upgrades are necessary to meet appropriate State standards.

12. At some future time, a single-story staff bunkhouse may be constructed near the dormitory. Plans call for the bunkhouse to be 1,000 square feet in size and to provide for housing up to four staff members or guests. It will include a small kitchen and bathroom and will be connected to the septic/drainage system for the dormitory. Water will be provided by the system that serves the dormitory.

13. Gutters and downspouts will be installed on new buildings for stormwater collection and appropriate drainage control. No drainage will be allowed to flow directly into adjacent surface waters.

14. A small transformer shed houses a 25 KVA transformer for the residence, currently powered by the Secret Harbor School generator system. A new, stand-alone power generating station is proposed for the new residential facility. It will include a single diesel generator (about 20KW) and fuel system. A transfer switch will allow Deepwater Ranch reduced load emergency service from the Secret Harbor School main campus generating system.

15. Solid waste will be placed in a dumpster located on the adjacent Secret Harbor School campus. This dumpster is periodically removed from the island via barge and replaced with an empty dumpster. This service will be continued.

16. The employee count will vary with the number of residents enrolled in the program. A day shift childcare staff will commute to and from the island daily via an agency operated boat. The afternoon/evening staff and the nightwatch will arrive on the island around 4:00 p.m. and depart around 8:15 a.m. the next morning. Until the



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bunkhouse is built, these employees will sleep in quarters on the adjacent Secret Harbor School property.

17. The properties surrounding the proposed site are owned by Secret Harbor School to the west and private owners to the east (two lots). The surrounding land on the island is owned by the State Department of Natural Resources (DNR). The adjacent privately owned property is used as a summer vacation site. The owners have co-existed with the Secret Harbor School for many years with few concerns. The DNR property is preserved as natural or conservation land and is not occupied by people.

18. The application was circulated to various agencies and County departments for review. Their concerns are reflected in conditions of approval. There is no reason to think that compliance with applicable Code requirements cannot readily be achieved. There was no public correspondence or public testimony in opposition to this proposal. The nearby private owners support the project. The DNR is not concerned.

19. A Determination of Non-significance (DNS) under the State Environmental Policy Act (SEPA) was issued for this project on March 19, 2002. The DNS was not appealed.

20. The existing buildings are built with an exterior of wood, stained in natural brown color, with blue-green metal roofing. The new construction will contain similar features to blend with existing development and the natural surroundings. The proposed facility will preserve the largely open space character of the property and surrounding area. The use will be conducted in conjunction with activities at the adjacent Secret Harbor School campus. The development is not likely, in fact, to impose significant adverse environmental impacts.

21. The Comprehensive Plan and zoning designation for the site is Rural Reserve.

22. The general criteria for Special Use Permit Approval are set forth in SCC 14.16.900(2)(b)(v).

- (a) The proposed use will be compatible with existing and planned land use and comply with the Comprehensive Plan.
- (b) The proposed use complies with the Skagit County Code.
- (c) The proposed use will not create undue noise, odor, heat, vibration, air and water pollution impacts on surrounding, existing, or potential dwelling units, based on the performance standard of SCC 14.16.840.
- (d) The proposed use will not generate intrusions on privacy or surrounding uses.
- (e) Potential effects regarding the general public health, safety, and general welfare.
- (f) For special uses in Industrial Forest-NRL, Secondary Forest-NRL, Agricultural-NRL, and Rural Resource-NRL, the impacts on long-term



natural resources management and production will be minimized.

(g) The proposed use is not in conflict with the health and safety of the community.

(h) The proposed use will be supported by adequate public facilities or services and will not adversely affect public services to the surrounding areas, or conditions can be established to mitigate adverse impacts on such facilities.

23. The Staff Report analyzes the application in light of the above criteria and determines that, as conditioned, the proposal will meet them. The Hearing Examiner concurs in this analysis and adopts the same. The Staff Report is by this reference incorporated herein as though fully set forth.

24. Any conclusion herein which may be deemed a finding is hereby adopted as such.

CONCLUSIONS OF LAW

1. The Hearing Examiner has jurisdiction over the persons and the subject matter of this proceeding.

2. The requirements of SEPA have been met.

3. The proposed facility meets the Code definition of Group Care Facility. SCC 14.04.020. In the Rural Reserve zone, such a facility is listed as a Hearing Examiner Special Use. SCC 14.16.320(4)(n).

4. The proposal, as conditioned, will be consistent with the Special Use approval criteria of SCC 14.16.900(2)(b)(v).

5. The following conditions should be imposed:

(a) The group care facility shall be constructed and operated as proposed in the application materials, except as the proposal may be modified by these conditions.

(b) The applicant shall obtain all necessary permits prior to the start of operations.

(c) Before issuance of building permits, the water system plans shall have been approved by the State Department of Health.

(d) Prior to occupancy of the structures, the water system shall have been constructed per the approved plans with all testing and certification completed by a licensed professional engineer.



(e) Prior to the issuance of a building permit for the new dormitory, an onsite septic system shall be approved. If commercial kitchen requirements necessitate upgraded sewage disposal for the residence, appropriate facilities shall be designed.

(f) Prior to occupancy of the structures, the sewage system shall be constructed per the approved plans.

(g) Barrier free facilities shall be provided for the dormitory, for any remodeled portion of the existing residence, and for the staff residence.

(h) Temporary sedimentation and erosion control must be used during construction. No building material or debris shall be allowed to enter the water.

(i) The project shall be commenced within two years of approval. The final inspection shall be completed within three years of any building permit approval. If these time frames are not met, the permit shall become void as to any element concerned.

(k) The Planning and Permit Center shall be notified within 30 days after any change in ownership of the parcel. A new ownership certificate shall be submitted referring to File No. PL01-0777.

(l) Prior to the issuance of any building permit all planning review fees shall be paid.

(m) Failure to comply with any conditions of this permit may result in its revocation.

6. Any finding herein which may be deemed a conclusion is hereby adopted as such.



DECISION

The requested special use permit is approved, subject to the conditions set forth in Conclusion 5 above.

Wick Dufford

Wick Dufford, Hearing Examiner

Date of Action: June 18, 2002

Copy Transmitted to Applicant: June 18, 2002

Attachment: Staff Report

RECONSIDERATION/APPEAL

As provided in SCC 14.06.180, a request for reconsideration may be filed with the Planning and Permit Center within 10 days after the date of this decision. As provided in SCC 14.06.120(9), the decision may be appealed to the Board of County Commissioners by filing a written Notice of Appeal with the Planning and Permit Center within 14 days after the date of the decision, or decision on reconsideration, if applicable.



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SKAGIT COUNTY PLANNING & PERMIT CENTER

FINDINGS OF FACT

HEARING AUTHORITY: SKAGIT COUNTY HEARING EXAMINER

HEARING DATE: May 22, 2002

APPLICATION NUMBER: PL01-0777

APPLICANT: Secret Harbor School
c/o Judy Grosvenor

ADDRESS: 1809 Commercial Avenue
Anacortes, WA 98221

PROJECT DESCRIPTION: Special Use Permit Request PL01-0777 for a group care facility located at Deepwater Ranch on Cypress Island.

PROJECT LOCATION: The proposed project is located in the southeast corner of Cypress Island; Lots 1,2, & 3 of Short Plat #127-78, a portion of Government Lot 4; within a portion of the SE ¼ of the NW ¼ of Section 04, Township 35 North, Range 01 East, W.M., Skagit County, Wa.

ASSESSOR'S ACCOUNT NUMBER: 350104-2-006-0008

P# Number: P#31208

ZONING: Rural Reserve

COMPREHENSIVE PLAN: Rural Reserve

RECOMMENDATION: The Planning & Permit Center recommends **approval** of the application for a Special Use permit, subject to conditions and modifications.

EXHIBITS:

1. Application dated January 18, 2002
2. Environmental Checklist
3. Detail project description
4. Special Use Application Evaluation Criteria
5. Site Plan
6. Assessor Map (partial)
7. Letter of completeness dated February 19, 2002
8. Notice of Development dated February 28, 2002
9. Determination of Nonsignificance dated March 19, 2002
10. Photos



STAFF FINDINGS:

1. The subject property is zoned Rural Reserve and the Comprehensive Plan designates the area as Rural Reserve.
2. Per Skagit County Code Section 14.06.100 a letter of completeness was issued on February 19, 2002. A Notice of Development Application was posted on the subject property, published in a newspaper of general circulation, and mailed to property owners within 300 feet of the subject property on February 28, 2002 as required by Skagit County Code Section 14.06.150(2) of the Skagit County Code. The public hearing has been advertised and notices sent as required by Skagit County Code Section 14.06.150(3).
3. The application has been reviewed in accordance with the State Environmental Policy Act guidelines (WAC 197-11 and RCW 43.21C). A Determination of Nonsignificance (DNS) was issued on March 19, 2002, becoming effective following the fifteen-day comment period ending April 5, 2002 and fourteen-day appeal period ending April 19, 2002.
4. The subject application has been reviewed with respect to the Skagit County Critical Areas Ordinance Chapter 14.24 of the Skagit County Code. The subject property was initially reviewed with a previous special use application (PL98-0056). There are no geo-tech or eagle concerns for this proposal.
5. The subject property is not located in a Flood Hazard Zone per FIRM Map 530151 0025C dated 1/3/85. The subject property is located within 500 feet of lands designated as Public Open Space of Regional/Statewide Importance.
6. The subject property consists of three lots created by a short plat in 1978 and is approximately 15 acres in size. The property is located adjacent to Secret Harbor and Deepwater Bay on Cypress Island. The subject property is developed including an existing single family residence, chapel, greenhouse, and several outbuildings. The land slopes gently downward toward the water and is basically cleared. On site sewage and private water serve the property.
7. The applicant (Secret Harbor School) owns the adjoining approximate 112 acres with approximately 5 acres of that land developed. The Secret Harbor School is a private, non-profit human service agency with its main office located in Anacortes. A significant part of the program is the residential treatment center for at-risk adolescent boys along with the school located on Cypress Island. The existing Cypress Island campus currently consists of several buildings in a rustic environment. This operation is considered a preexisting nonconforming use. The surrounding property, beyond what the school owns, except for the two adjacent lots



is owned by the State of Washington and is undeveloped.

8. The applicant is requesting a Special Use Permit to allow for a group care facility located on the 15 acre site. The Group Care facility would operate as a residential treatment program for up to twelve (12) boys, aged 11 through 17, and would be a year-round operation (24 hours per day, 365 days per year). The Group Care facility would employ up to a maximum of eight (8) employees on site at any one time. The group care facility will utilize the existing structures, with slight modification to the existing residence. An additional dormitory will be constructed for students' residence and for staffing purposes. An additional staff bunkhouse is proposed for some time in the future.

The existing main cabin will be the residence for up to two staff and will be used primarily for family visits, counseling sessions and other professional meetings. The Cook/Housekeeper and Groundskeeper/Maintenance will live in the master bedroom/bath area of the residence on a full-time basis. The other two existing bedrooms will be converted to office space for use by counselors or other staff. Students will be inside the house only for meals, and they will generally be limited to the dining area. On occasion, one or two students may assist staff in this building in performing kitchen duties, or on family visits or counseling sessions. If possible, the house will continue to use the existing septic/drainage system, unless the commercial kitchen requirements dictate that a new system be designed and installed. If that is the case, the residence will most likely be included with the design for the new septic for the dormitory

9. A new single-story dormitory, approximately 3500 square feet in size, will be constructed to the southeast of the residence. The dormitory will be the residence for up to twelve (12) students. It will be designed with 8-single rooms and 2-double rooms, plus a staff office, living space, lavatories, laundry, and mechanical rooms. The architecture and exterior design of the dormitory will be compatible with the design of the residence. The dormitory will be connected to a new septic/drainage system.

At some time in the future a single-story staff bunkhouse, approximately 1000 square feet in size, may be constructed. It will house up to four (4) overnight staff, and will be located near the student dormitory. The staff bunkhouse will contain a small kitchen and bathroom, and will be connected to the dormitory septic/drainage system. According to the applicant, they do not anticipate more than three staff in this bunkhouse, the fourth 'bed' would be reserved for visiting staff or emergency sleeping needs only (due to adverse weather conditions and canceling a boat run).

10. The actual employee count will depend on the actual number of residents enrolled in the program. The applicant has provided a detailed description in their narrative of the number of employees for each shift. As stated earlier the Housekeeper/Cook and Groundskeeper/Maintenance persons will reside in the existing residence on a full-time basis. Day shift childcare staff will commute on/off the island each day via agency-operated boat. Afternoon/evening childcare staff and scheduled nightwatch staff will arrive at the island around 4:00 pm, and will stay on the island until the boat departs at around 8:15 am the next morning. For the next year or two, these employees will sleep in staff bunkhouses located on the adjacent property currently owned and operated by Secret Harbor School.

11. The proposed site currently has three wells in place. The residence is currently served by a 260-foot deep well that is located behind the home. For this project, is it proposed that a well located in the southerly sector of Lot 2 be further tested and developed as a Group A Water System. Secret Harbor School staff is currently working with engineers and the State Health Department. The Agency already has certified Water System Operators and currently operates a Group A system on the other island campus. Once developed and certified, the proposed dormitory and future staff residence would be served by this system.

A small transformer shed houses the 25 KVA transformer for the residence, and is currently powered by the Secret Harbor School generator system. A new, stand-alone power generating station is proposed for this property. The station will include a single diesel generator (about 20 KW) and fuel system. A transfer switch will allow the Deepwater Ranch reduced load emergency service from the Secret Harbor School main campus generating system via the existing transformer.

Solid waste will be placed in a dumpster, which is located on the adjacent Secret Harbor School campus. This dumpster is periodically removed from the island via barge and replaced with an empty dumpster through an account with Waste Management. These services would continue under this proposal.

12. SCC 14.04.020 defines Group Care Facility as living quarters for children or adults meeting applicable Federal and State standards that function as a single housekeeping unit and provide supporting services, including but not limited to counseling, rehabilitation, and medical supervision, not exceeding more than 20 residents and staff. If staffed by nonresident staff, each 24 staff hours per day equals 1 full-time residing staff member for purposes of determining number of staff.



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13. The application was routed to the various county departments for review and comments. Their comments are as follows:
Public Works—no concerns. **Greg Geleynse Septic**—Septic system will need to be reviewed as this is a change of use. It appears that the existing system (S85-0146) is a 4 bedroom system. Converting this to a commercial kitchen will necessitate looking at a possible upgrade. **Al Jongsma Assistant Building Official**—Prior to a complete building design WAC 51-40-313 Section 313 requirements for Group Licensed Care occupancies should be discussed with the plans examiner. **Lorna Parent—Health Department (Water)**—Prior to issuance of the building permits, the water system shall have approved plans and specifications from the State Department of Health for those improvements. Prior to occupancy of the new structures, the water system shall be constructed per the approved plans with all testing and certification completed by their licensed professional engineer.
14. Skagit County Code Section 14.16.900(2)(b)(v) Special Uses indicates that certain criteria will be reviewed when approving or denying Special Use Permits. Those items are as follows:

A. The proposed use will be compatible with existing and planned land use and comply with the Comprehensive Plan.

Chapter 12 Economic Development Element of the Comprehensive Plan has policies that support the proposed project. **Policy 12E-5.1** states Skagit County shall support development and maintenance of human and social service facilities including but not limited to health care, education, transportation and other services for special needs populations. **Policy 12E-5.2** In cooperation with local jurisdictions, Skagit County shall plan for public use and other sites sufficient to meet demand for human and social service facilities through the duration of the comprehensive plan.

The existing buildings are built with an exterior wood, stained in natural brown color, with blue-green metal roofing. The main cabin architecture is appropriate for a rural setting. The new construction will contain similar architectural features to blend in with the existing site and natural surroundings. The proposed facility will preserve the open space character of the nearby properties. The group home operation is compatible with the existing Secret Harbor School campus on the adjacent property to the west.

B. The proposed use complies with the Skagit County Code.



The subject property is zoned Rural Reserve. SCC 14.04.020 defines Group Care Facility as living quarters for children or adults meeting applicable Federal and State standards that function as a single housekeeping unit and provide supporting services, including but not limited to counseling, rehabilitation, and medical supervision, not exceeding more than 20 residents and staff. If staffed by nonresident staff, each 24 staff hours per day equals 1 full-time residing staff member for purposes of determining number of staff. SCC 14.16.320 (4)(n) listed Group Care Facility has a Hearing Examiner Special Use. The application is then reviewed on its own merits.

- C. The proposed use will not create undue noise, odor, heat, vibration, air and water pollution impacts on surrounding, existing, or potential dwelling units, based on the performance standard of SCC 14.16.840.**

The proposed Facility in general will not generate unusual noise, odors, heat, vibration, air and water pollution. The power generating equipment will run on a continuous basis except for scheduled or emergency shutdown. The equipment will be designed to meet or exceed applicable noise and air pollution limits. Some heat will be generated from the power generator but will be limited to the exhaust discharge point only and will quickly dissipate into the atmosphere. No heavy equipment or machinery is proposed for use on this site. The power generating equipment will be secured to minimize vibrations. Such vibrations are anticipated to be minimal and limited to the system only and will not impact adjacent properties. In general no hazardous chemical solvents, etc will be stored on this site. Existing fuel tanks for both propane and diesel are located near the existing residence. A new fuel tank will be installed near the power generating equipment and will be designed to the proper containment codes. Both tank locations are some distance from water supplies and pose minimal pollution risk to water supplies.

There will be noise associated with the students/staff and comings and goings of running this operation. However since the adjoining property to the east is used only on a part time basis, the impact should be minimal.

- D. The proposed use will not generate intrusions on privacy of surrounding uses.**

The adjacent properties west and south of the proposed site are owned by Secret Harbor School. The adjacent property to the east is under private ownership. Other properties not directly adjacent to the site are owned by the Department of Natural Resources. The school and residential treatment center are currently operating on the property to the west



and the development of this site does not intrude on the privacy of this operation. If the Group Care Facility is approved it will operate in conjunction with this current operation in already in place. The privately owned property is used as summer vacation sites and the owners have co-existed with the adjoining operation with few concerns. The owners have signed a recorded easement that allows for the school staff, residents and visitors to cross their property for access to the campus. The DNR property is not developed.

E. Potential effects regarding the general public health, safety, and general welfare.

Public health, safety, and general welfare will not be impacted by this proposal. This area of the island is not served by public transportation or boats and is not open to the general public. The proposed use, however, offers a solution for at-risk youth (boys) who need this group home setting to manage their mental health and behavioral issues.

F. For special uses in Industrial Forest-NRL, Secondary Forest-NRL, Agricultural-NRL, and Rural Resource-NRL, the impacts on long-term natural resource management and production will be minimized.

The subject property is not located in a designated resource land.

G. The proposed use is not in conflict with the health and safety of the community.

If approved as conditioned the proposed use will not be in conflict with the health and safety of the community.

H. The proposed use will be supported by adequate public facilities or services and will not adversely affect public services to the surrounding areas, or conditions can be established to mitigate adverse impacts on such facilities.

There are no public facilities or services available on the Island, therefore there are no impacts on such services.



RECOMMENDATION:

The Skagit County Planning & Permit Center recommends **approval** of the Group Care Facility for Secret Harbor School, as described in the attached project description, located at Deepwater Ranch on Cypress Island.

1. The applicant shall obtain all applicable permits prior to the start of business.
2. Prior to issuance of the building permits, the water system shall have approved plans and specifications from the State Department of Health for those improvements.
3. Prior to occupancy of the new structures, the water system shall be constructed per the approved plans with all testing and certification completed by their licensed professional engineer.
4. The buildings (existing or proposed) shall meet WAC 51-40-313 Section 313 requirements for Group Licensed Care occupancies.
5. When the commercial kitchen is constructed, the on-site sewage disposal system will need to be approved for this additional use.
6. Prior to issuance of the any building permit for the proposed dormitory an onsite septic system permit must be approved.
7. Barrier free facilities will need to be provided for the dormitory, any remodeled portion of the existing residence, and the future staff residence.
8. Per SCC 14.16.900(2)(d) this permit shall be void if the use permitted by the permit has not been established or a complete building permit filed with the Planning and Permit Center within 2 years of the permit approval.
9. The County Planning and Permit Center shall be notified within 30 days after any change in ownership of the parcel. A new ownership certificate shall be submitted to the Skagit County Planning and Permit Center refer
10. Prior to the issuance of any building permit all planning review fees shall be paid in full.

Prepared by: MS