

## CHAPTER 4 DRAFT EIS COMMENTS AND RESPONSES

### 4.1 Introduction

The Notice of Availability for the Draft EIS was published on April 3, 2003. The comment period ended on May 30, 2003.

This section of the Final EIS contains letters of comment on the Draft EIS from public agencies and private citizens, together with responses to those comments. Each comment letter is followed by a response, with each response numbered to correspond to the numbered comments.

Skagit County, the City of Burlington and the Port of Skagit County wish to express their appreciation of all commenting agencies and individuals for taking the time and effort spent in reviewing the Draft EIS.

### 4.2 Comments Received At May 20, 2003 Public Hearing

The Skagit County Planning Commission held a public hearing on May 20, 2003, at 7:00 PM in Hearing Room C, Skagit County Administration Building, to take comment on the Draft EIS. Twenty speakers provided comment: all comments related to the Draft Subarea Plan. The names of those speaking are shown below and a summary of their comments is contained in Section 4.4. The transcript of the public meeting will be forwarded to the Planning Commission during their deliberations on adoption of the Draft Subarea Plan.

#### **Commentors on Draft Subarea Plan:**

|                                            |                |
|--------------------------------------------|----------------|
| Bradford E. Furlong, Port of Skagit County | Susan Henry    |
| John Ravnik                                | Bill Henry     |
| Philip Serka for R. Kraig Knutzen          | Kristin Lovell |
| Randy Good                                 | Teddy Hickox   |
| Audrey Dorai                               | Paul Taylor    |
| John Schultz                               | John Shambaugh |
| Tim Lewis                                  | Robert Hilton  |
| Kim Johnson                                | Kraig Knutzen  |
| Shane Gildness                             | Cindy Jacobson |
| Charles H. Bennett                         | Brad Spangler  |

### 4.3 Comment Letters And Response To Comments

#### Letters Received Commenting on Draft EIS:

##### Public Agency

Letter: Public Utility District No. 1 of Skagit County (Scott Spahr, Planning Engineer)  
Letter: Skagit County Parks & Recreation (Bob Vaux, Director)  
Letter: Skagit County Public Works Department (Steve Flude, Assistant Public Works Director)  
Letter: Port of Skagit County

##### Local Organizations

Letter: 1000 Friends of Washington (Ellen Gray, Skagit/Snohomish Program Director)  
Letter: Skagitonians to Preserve Farmland (Bob Rose, Executive Director)  
Letter: Skagit County Growthwatch (Gerald Steel, PE)

##### Private Citizens

Letter: Arthur W. (Bill) Henry  
Letter: Arthur W. (Bill) Henry  
Letter: Gary T. Jones  
Letter: Stephen Louia  
Letter: Jonathan K. Sitkin (on behalf of John Bouslog, Bouslog Investments LLC and JBK Investments LLC)

#### Letters Received Commenting on Draft Subarea Plan:

In addition to letters received commenting on the draft EIS, numerous letters were received commenting on the Draft Subarea Plan. These comments are summarized in Section 4.5, following the “Response to Comments” section, but are not reproduced in this EIS. The following comments will be forwarded to the Planning Commission during their deliberations on adoption of the Subarea Plan.

##### Public Agency

Letter: Drainage District #14 (Fred Boonstra, President)  
Letter: Dike District #12 (John R. Shultz)  
Letter: Skagit County Fire District #6 (Mark R. Anderson, Fire Chief)  
Letter: Drainage District #14 (Paul W. Taylor)  
Letter: Washington State Department of Transportation (John Shambaugh, Senior Planner)

##### Local Organizations

Letter: Friends of Skagit County (June Kite, President)  
Letter: Skagit Airport Support Association (Jay Findlay, President)

##### Private Citizens

|                               |                              |
|-------------------------------|------------------------------|
| Letter: Joseph E. Abbott      | Letter: Judy Bedard          |
| Letter: Michael & Patti Baith | Letter: Lynne Blanford       |
| Letter: Gretchen Horen Barden | Letter: Sally Bosse          |
|                               | Letter: John & Shirley Brown |

Letter: Ronald Buchholz  
Letter: Bruce Bussert  
Letter: Richard & Linda Chambers  
Letter: Ron & Susan Chiabai  
Letter: Barbara Dunn  
Letter: Henry & Charlotte Dykstra  
Letter: Carol Ehlers  
Letter: Martha L. Fishel  
Letter: Lorence & Donna Freiman  
Letter: Marilyn Grambo  
Letter: Sarah Hamidou  
Letter: Gary & Deborah Helm  
Letter: Susan Henry  
Letter: W. Gary & Catherine N. Herdt  
Letter: James & Lois Holden  
Letter: John & Cherralee Hoover  
Letter: Harvey M. Hutchings  
Letter: Lynda Martin Hyatt  
Letter: Ralph & Betty Jackson  
Letter: Larry R. Jensen  
Letter: Kimberlee S. Johnson  
Letter: Thomas C. Johnson  
Letter: Jane S. Johnston  
Letter: Ross Johnston  
Letter: Gary T. Jones (on behalf of clients  
John & Twila Brink)  
Letter: Kraig Knutzen & Roger Knutzen  
Letter: William A. Knutzen  
Letter: Fern Larson  
Letter: Mike & Kristin Lovell  
Letter: Dan & Janae Luvera

Letter: Mary Ann Mercer  
Letter: Marc J. Neff  
Letter: Marissa Courtney Neff  
Letter: Mary S. Neff  
Letter: Wesley Sue Place  
Letter: James J. Poth  
Letter: John Ravnik  
Letter: Pat Rawlins  
Letter: Sherman & Cosetta Roth  
Letter: Philip A. Serka (on behalf of Kraig  
& Roger Knutzen)  
Letter: Mike Shelley  
Letter: Tami Shelley  
Letter: Brian Sibley  
Letter: Skagit Surveyors & Engineers (on  
behalf of Mike Fohn)  
Letter: C. Gordon Smith  
Letter: Patricia K. Smith  
Letter: Bradley R. Spangler  
Letter: Leslie Spangler  
Letter: Robert M. Stanley  
Letter: Don & Sharon Tapley  
Letter: David M. Thomas  
Letter: Jack R. Wallace  
Letter: Jeanne Wright  
Letter: Audrey Yerger  
Letter: Unsigned  
Letter: Unsigned  
Letter: Unsigned (mentions Knutzen Family  
Farm)

**Arthur W. (Bill) Henry**

*Letter dated May 28, 2003 (25)*

**Comment 1.** The residential component should be removed from the Bayview Ridge Subarea Plan because urban residential development within the Airport Environs is unwise and unnecessary. Residential growth can be accommodated throughout the entire Bayview Ridge outside the Airport Environs and farmland. Probable drainage difficulties associated with more intense residential development in several of the alternatives would be eliminated.

**Response 1.** *Your comment is acknowledged and will be forwarded to the Planning Commission for their deliberations on adoption of the Subarea Plan.*

**Comment 2.** A map of “Alternative 5” is included to provide for expanded industrial (BR-LI and BR-HI), neighborhood business (BR-CC), and removal of the residential component.

**Response 2.** *Your comment is acknowledged and will be forwarded to the Planning Commission for their deliberations on adoption of the Subarea Plan.*

**Comment 3.** Please support a citizen group to provide a Subarea Plan for the balance of Bayview Ridge.

**Response 3.** *Your comment is acknowledged and will be forwarded to the Planning Commission for consideration during deliberations on adoption of the Subarea Plan.*

## Arthur W. (Bill) Henry

*Comments Presented May 20, 2003 (29)*

**Comment 1.** Any group of citizens has the right to create a Subarea Plan for their community. This Citizens Advisory Committee was formed to legitimize desired development objectives.

**Response 1.** *Your comment is acknowledged and will be forwarded to the Planning Commission for consideration during their deliberations on adoption of the Comprehensive Plan.*

**Comment 2.** The statistics that indicate that 77 percent of the houses in Bayview Ridge are on lots of one-third of an acre or less are misleading. If open space associated with the existing residential development is included, the average would be one housing unit per more than one acre. This would be consistent with the zoning that existed before the 1997 revision of the County Comprehensive Plan.

**Response 2.** *The reference in the Subarea Plan to 77 percent of the lots within the Subarea being on lots of one-third acre or less, is an accurate statement. The over-all residential density (includes areas of lots and permanent open space) in the residential areas varies considerably, from urban densities within the Country Club, to five units/acre in the area north of Peterson Road and along Josh Wilson Road, and to larger ownerships with only one single-family dwelling.*

**Comment 3.** Location of urban residential densities between the airport and agricultural uses is unwise.

**Response 3.** *Your comment is acknowledged and will be forwarded to the Planning Commission for consideration during their deliberations on adoption of the Comprehensive Plan.*

**Comment 4.** The residential component should be removed from the Bayview Ridge UGA. Because of the Airport Environs zone, Bayview Ridge will never have the services or amenities of a city. A Subarea Plan should be prepared for the entire Bay View Ridge.

**Response 4.** *Your comment is acknowledged. Please refer to Responses 1 and 2 of your May 30 letter.*

## Gary T. Jones

*Letter dated May 30, 2003 (57)*

**Comment 1.** Inclusion of the Cargil property within the Urban Growth Area boundaries (Alternative 2) is not compatible with the current and future plans for this property. The current zoning of Natural Resource Industrial is more consistent with the level of urban services required for this property.

**Response 1.** *Your comment is acknowledged and will be forwarded to the Planning Commission for consideration during their deliberations on adoption of the Subarea Plan.*

**Comment 2.** The Cargill facility is a regional plant depending on rail access and truck traffic. Improvements to both systems are needed.

**Response 2.** *Your comment is acknowledged and will be forwarded to the Planning Commission for consideration during their deliberations on adoption of the Subarea Plan.*

**Comment 3.** We encourage the proposed change in signage on Natural Resource Industrial land.

**Response 3.** *Your comment is acknowledged and will be forwarded to the Planning Commission for consideration during their deliberations on adoption of the Subarea Plan.*

**Comment 4.** The Comprehensive Plan of Skagit County should accommodate the growing need for agricultural processing and associated transportation corridors.

**Response 4.** *Your comment is acknowledged and will be forwarded to the Planning Commission for consideration during their deliberations on adoption of the Subarea Plan.*

**Comment 5.** The DEIS describes the railway facilities but does not analyze the need or opportunity to accommodate additional railway freight use. In-coming and outgoing products, which are most efficiently and inexpensively transported by rail have few options. Improvement of rail and truck traffic transportation along the SR 20 corridor should be considered in relation to planning for this area. An explicit recognition of a utility and transportation corridor from Burlington to the Swinomish Channel is recommended. This corridor should be integrated with flood protection and drainage improvements

**Response 5.** *Your comment is acknowledged and will be forwarded to the Planning Commission for their consideration during adoption of the Subarea Plan. To date, there has*

*been no long-term planning for the SR 20 freight rail corridor. Increased rail use is possible given long-term trends in increased containerized cargo and/or bulk handling at Ports situated outside central Puget Sound (i.e., Anacortes). Regarding the proposed Subarea Plan, those properties within the Subarea adjacent to this corridor are designated “industrial”; this designation would be consistent with future expansion of the corridor.*

## **Stephen Louia**

*Letter dated May 28, 2003 (66)*

**Comment 1.** The appearance of impropriety with respect to the Citizen Advisory Committee is strong.

**Response 1.** *Your comment is acknowledged and will be forwarded to the Planning Commission for consideration during their deliberations on adoption of the Subarea Plan.*

**Comment 2.** The costs of services required to support the proposed growth and new development will result in fiscal impacts on area property owners or county residents. These costs are not adequately identified.

**Response 2.** *Your comment is acknowledged and will be forwarded to the Planning Commission for consideration during their deliberations on adoption of the Subarea Plan.*

**Comment 3.** Form a new Advisory Committee and start over.

**Response 3.** *Your comment is acknowledged and will be forwarded to the Planning Commission for consideration during their deliberations on adoption of the Subarea Plan.*



**1000 Friends of Washington**  
**Ellen Gray, Skagit/Snohomish Program Director**

*Letter dated May 30, 2003 (89)*

**Comment 1.** In general, 1000 Friends of Washington supports Alternative 4. We particularly support the concept of using Bayview Ridge as a receiving site for the beginning of a Transfer of Development Rights program. The following suggestions are submitted.

- Add new policy to Objective 3A-4 to ensure that bike and pedestrian paths between residential areas and work sites are provided.
- A schematic drawing to illustrate the street tree concept should be provided to show tree location between the roadway and sidewalk.
- Policies calling for natural landscaping should specify native plants.
- The County should require low-impact development techniques within Bayview Ridge in order to reduce impervious surfaces and reduce the amount of stormwater requiring management.

**Response 1.** *Your comments are acknowledged and will be forwarded to the Planning Commission for consideration during their deliberations on adoption of the Subarea Plan.*

**Comment 2.** On page 5-4 (of the *Subarea Plan*) the third paragraph should read 744 dwelling units as opposed to 744 acres.

**Response 2.** *The correction to the Subarea Plan has been made.*

**Public Utility District No. 1 of Skagit County**  
**Scott Spahr, Planning Engineer**

*Letter dated May 13, 2003 (93)*

**Comment 1.** Although it is accurate to state that the District can accommodate growth for Alternatives 1 and 4 and not 2 and 3 based on the assumptions of housing and projections on Table 1B – Table 4B, Utility District 1 is concerned that if the 238-acre area designated Urban Reserve were developed at more than 1 home/5-acres, the District would not be able to accommodate that level of growth. The district would like to see the description of Alternative 4 amended to stipulate that growth would not exceed existing levels of water infrastructure capacity.

**Response 1.** *Your comment is acknowledged. Please see revised Section 3.5.5.2 of the FEIS.*

**Jonathan K. Sitkin**  
**(on behalf of Bouslog Investments LLC and JBK Investments LLC)**

*Letter dated May 30, 2003 (106)*

- Comment 1.** The impacts of Alternative 1 “No Action” on the cities have not been fully analyzed. This including the following:
1. Cost of infrastructure
  2. Loss of industrial land base
  3. Impact on housing costs/affordable housing
  4. Potential erosion of agricultural land base
  5. Development in flood plain
  6. Cost of non-compliance with the GMA
  7. Lack of requirement to strategically locate open space, coordinate land use or transportation planning, or coordination with other elements of the Airport Land Use Study
  8. No provision for TDR program will negatively impact agricultural land base
  9. Cumulative impacts on surface water and surface water quality of the No Action alternatives are not similar but worse than the proposed alternative.
  10. Cumulative impacts of minor fill on wetland mitigation
  11. Relative Impact on property tax and potential mitigation fees
  12. No planned public facilities such as schools, parks, or fire stations and reduced mechanisms for funding (see comment above).
  13. Regulations do not apply equally to all development as suggested on page 3-16. Smaller development that is more likely in Alternative 1 may have a more adverse cumulative impact since regulations that often apply to larger development may not apply to smaller scale development.

**Response 1.** *The impact of the No Action Alternative to the cities is beyond the scope of this EIS. If the Bayview Ridge Subarea Plan does not include an urban residential component, the 3,420 population allocated to Bayview Ridge by the year 2015, together with the 2015 population of 909 from the former Big Lake UGA, must be reallocated. It is assumed the population would be allocated to existing cities, as no other non-municipal UGA has been identified. The additional population that each city could accommodate is unknown at this time.*

*Population allocations are negotiated through the “Framework Agreement” among Skagit County, the City of Burlington, the City of Mount Vernon, the City of Anacortes, the City of Sedro Woolley, and the Town of LaConner. The cities of Anacortes, Burlington, La Conner, and Sedro-Woolley have documented population limits based on natural features, the presence of natural resource lands, and capacity of the utility systems. In the past, the City of Mount Vernon*

*has absorbed the urban residential population that cannot be accommodated by the other cities.*

**Comment 2.** The DEIS does not analyze the effect of the existing Comprehensive Plan on the impacts analyzed by the DEIS. The recent Growth Management Indicators Program report for Skagit County should be included as a background report. This report indicates the County is successful in directing growth to urban areas; the proposed Subarea Plan enhances and furthers this success.

**Response 2.** Your comment is acknowledged. Section 3.2.2 of the DEIS addresses the consistency of each alternative with the Skagit County Comprehensive Plan (2000) and the Countywide Planning Policies (2000). The *2002 Growth Management Indicators (GMI) Report* is the County's first report to document/monitor the County's success in implementation of the Comprehensive Plan. Directing the majority of the new population and housing growth to urban areas are two benchmarks of successful plan implementation. The proposed Bayview Ridge Subarea Plan would provide an additional urban area to accommodate projected urban development, thus assisting in achieving these two benchmarks .

**Comment 3.** The CAC was directed to comment on the Subarea Plan as presented by County staff. This Plan assumed an urban residential component and the CAC was not asked to comment on that previous decision.

**Response 3.** *Your comment is acknowledged and will be forwarded to the Planning Commission for their consideration during deliberations on adoption of the Subarea Plan.*

**Comment 4.** There is a glaring lack of analysis of the impacts of the No Action Alternative. Upon close scrutiny, the impacts of No Action are often greater than the proposed project due to the lack of infrastructure and different regulatory requirements.

**Response 4.** *Development under the No Action Alternative must be consistent with all County, State, and Federal land use and environmental regulations. It is assumed these regulations will be enforced. While it is correct that the No Action Alternative may result in more fragmented development within the residential area, the absence of a regional storm drainage system, and increased use of septic tanks, it must also be recognized that the low density of development will minimize the adverse impacts.*

**Comment 5.** The DEIS fails to address the positive aspects of the Preferred Alternative with regard to identifying, enhancing and expanding upon the livable nature of the

existing community. Also, Section 2.1.5 should note that Bayview Ridge is already intensely developed with urban type lots and urban residential development.

**Response 5.** *The “livable nature of the community” is, to some extent, subjective. Some residents may prefer a semi-rural life-style, with new development situated on large tracts and few amenities such as sidewalks, street lights, a shopping area, a variety of housing types, etc. Other residents may prefer more urban amenities. In the case of Bayview Ridge, an urban level of fire, police, water, and power service will be provided under any alternative.*

*The fact that Bayview Ridge already contains “urban” residential lots does not relate to a benefit or disadvantage of delaying adoption of the Subarea Plan.*

**Comment 6.** Although all development on Bayview Ridge is subject to the requirements of the DOE Stormwater Management Manual for Western Washington (2001), smaller developments such as Short CaRDs will not require the same level of treatment and management as larger developments.

**Response 6.** *Your comment is acknowledged and will be forwarded to the Planning Commission for consideration during adoption of the Subarea Plan.*

**Comment 7.** Participation in an area-wide drainage program, as suggested at the DEIS public meeting, should be an alternative to compliance with the 2001 DOE Stormwater Manual as put in effect by Skagit County. The area-wide drainage program should be encouraged as an alternative through other programs. A comprehensive drainage plan would be unlikely with Alternative 4 “No Action.”

**Response 7.** *Your comment is acknowledged and will be forwarded to the Planning Commission for consideration during adoption of the Subarea Plan.*

**Comment 8.** The DEIS does not analyze the lack of stormwater facilities for existing residences and the net benefits of participation in a regional stormwater system.

**Response 8.** *The County currently has no information on the condition of existing residential storm drainage systems beyond that identified in the DEIS. The County will, however, be conducting modeling for the Bayview Watershed Stormwater Management Plan; this modeling will reflect both current and future runoff rates from the hill and will include some modeling of existing stormwater facilities. The intent of this Plan is, however, to address regional, not site-specific issues.*

**Comment 9.** Comments re. stormwater mitigation:

- Some of the potential mitigations are already in existence such as limitations to impervious surface and public education efforts
- Definitions of terms such as sensitive areas and low impact development would be helpful
- Include incentives to encourage efficient use of impervious surfaces such as narrower roads and use of trails instead of sidewalks as recommended by the CAC.
- Any future project must undergo SEPA review and is subject to regulations in effect at the time of development.

**Response 9.** *Your comment is acknowledged and will be forwarded to the Planning Commission for consideration during adoption of the Subarea Plan.*

**Comment 10.** Statements relating to wetland regulations in the DEIS are overly broad or overstated. Some wetlands may be exempt from regulation. Wetland and habitat mapping do not correlate with on-site conditions, and should not be considered accurate. Projects adjacent to Higgins Slough, which acts primarily as an agricultural ditch, could include mitigation strategies. The only potential fish habitat on Bayview Ridge is Higgins Slough. Comments on page 3-15 should be modified to reflect the regulatory requirements to mitigate impacts to wetland degradation and loss resulting from development. The regulations do not apply the same to all Alternatives due to the differences in the size of developments.

**Response 10.** *Please refer to the revised text of Section 3.1.2.3 in the Final EIS.*

**Comment 11.** The ultimate issue is not if, but how residential development is to occur on Bayview Ridge. The Subarea Plan is designed to further enhance the character of the existing community. The DEIS should clearly state that the county-wide allocation of growth is a given due to a settlement agreement of all parties with a legal right to appeal.

**Response 11.** *Your comment is acknowledged. Please see Response 1.*

**Comment 12.** With respect to the effect of wetland regulations on density, it should be noted that the actual built density can be increased up to 12 units per acre, with the zoning density of 4 – 6 units per acre.

**Response 12.** *Section 14.16.335 6) of the draft Development Regulations establishes residential densities within Bayview Ridge Residential (BR-R) at one unit per 10,890 square feet, or one-quarter fraction of an acre, over the entire development site. For example, within any one portion of the development site, an apartment building with up to 12 units can be constructed, assuming that the site encompasses at least three acres.*

**Comment 13.** Urban levels of water and sewer all exist or have been planned for.

**Response 13.** *Your comment is acknowledged and will be forwarded to the Planning Commission for consideration during adoption of the Subarea Plan.*

**Comment 14.** The No Action Alternative makes no provision to for achieving the GMA and Skagit County goals of affordable housing. The interrelationship between the 25% standard market factor and residential market pricing should be discussed.

**Response 14.** *Your comment is acknowledged. Section 3.2.2.2 of the EIS states that Alternative 1 does not provide significant opportunities for new housing. At this time, while it is clear that Alternatives 2, 3, and 4 would provide significant new housing, it is unknown to what extent it would be “affordable housing.” Also, please see revised Section 3.2.1.2, fourth bullet.*

**Comment 15.** There is no discussion of the impacts to other communities and special purpose districts if Bayview Ridge does not take its share of residential growth.

**Response 15.** *The impacts of the No Action Alternative to other communities is beyond the scope of this EIS. Please refer to Response 1. The Port of Skagit County has publicly stated its support for Alternative 4, but has not expressed significant concerns regarding potential approval of Alternative 1, No Action. Impacts to the Diking and Drainage Districts is addressed in Section 3.1.1.2 of the EIS.*

**Comment 16.** The capacity levels of Peterson Road will be within the level of service for all alternatives.

**Response 16.** *Your comment is acknowledged.*

**Comment 17.** Mitigation comments follow:

- Not all land in the Subarea lies within the airport overlay zone.
- The potential mitigating measures can only apply to Alternatives 2 – 4, not to Alternative 1. The aviation easement requirement will apply only if the zoning becomes urban.
- What impact would Alternative 1 have on the airport if aviation easements for future airport expansion are lacking. The NO action alternative will require the County, at its cost and liability, to defend the requirement of an aviation easement if imposed as a condition of permit issuance. The easement, in absence of urban zoning, would be an unconstitutional taking. The preferred Alternative addresses the POSC need for aviation easements.

**Response 17.** *The requirement for avigational easements originated in the 1980's, based on the County Commissioners and Port Commissioners commitment to protect the Bay View Ridge Airport. The easement requirement was not enforced, however, until specific language was developed as a result of adoption of the Airport Environs Overlay Zone in 2000. This requirement for avigation easements is not based on the presence of urban zoning, but on protection of the Airport.*

**Comment 18.** The importance of the Land Use Compatibility Study which complies with WSDOT guidelines and establishes measures for discouraging incompatible land uses relative to issues of safety for pilots in flight, the general public, and noise impacts should be given greater significance within the compatibility with Plans and Policies section.

**Response 18.** *Please refer to Section 3.2.2.2. of the EIS regarding the compatibility of each of the Alternatives with the "Skagit Regional Airport Land Use Compatibility Study."*

**Comment 19.** Airport forecasts and projections have not been updated within the last 10 years. It appears the level of activity is far short of the anticipated growth.

**Response 19.** Your comment is acknowledged. The current growth of airport traffic is short of what was projected for commuter service in the *1995 Airport Master Plan*. Business jet visits to the airport have, however, been greater than anticipated. The Port of Skagit County anticipates updating the *Airport Master Plan* in 2005.

**Comment 20.** Of the "action" alternatives, Alternative 4 has the least amount of residential traffic added to the existing network. All alternatives are similar with regard to industrial traffic impacts. The DEIS notes that exceeding LOS standards is not anticipated. Project-based traffic mitigation will be required as part of the SEPA process. In lieu of specific improvement projects, impact fees are a viable alternative. Concurrency compliance is assured through project level SEPA review. Modification of internal road standards to encourage minimization of impervious surfaces will encourage bicycle and pedestrian modes of transportation.

**Response 20.** *Your comment is acknowledged and will be forwarded to the Planning Commission for consideration during adoption of the Subarea Plan.*

**Comment 21.** Crime Prevention through Environmental Design (CPTED) policies can be encouraged through incentives in the development regulations.



**Response 21.** *Your comment is acknowledged and will be forwarded to the Planning Commission for consideration during adoption of the Subarea Plan.*

**Comment 22.** The DEIS could indicate the willingness for large landowners to participate in voluntary mitigation agreement for the financing or land donation of the proposed fire station. The increase in residential population increases the pool of potential volunteer fire personnel. Project level SEPA will address fire and emergency medical response and protection issues.

**Response 22.** *Your comment is acknowledged and will be forwarded to the Planning Commission for consideration during adoption of the Subarea Plan. Also, see revised Section 3.5.2 of the EIS.*

**Comment 23.** The Alternative 1 discussion should include the impact of no parks or community center.

**Response 23.** *Section 3.5.3.2 of the DEIS states that it is unknown what funding priority the Bayview Community Park would have under Alternative 1. If the park is not built, the estimated 2,050 residents within Bayview Ridge would have an unmet need for 16.2 acres of community park and 3.1 acres of regional park.*

**Comment 24.** Regarding schools, payment of impact fees is warranted and assures concurrency. There is land located with the Subarea that is also outside the Airport Environs Overlay. A reduction of the size of the overlay is possible based on actual aircraft traffic patterns, which would increase the availability of land for the school district. No analysis was done regarding capacity under the No Action Alternative. Bayview Elementary is over-capacity with a waiting list and a new K-8 elementary school is contingent on growth within the district. The need for a new school may be triggered regardless of whether or not urban residential growth occurs within the Subarea. An unavoidable impact under all four Alternatives may be the requirement of a new elementary school serving Bayview Ridge and west Burlington.

**Response 24.** *Your comment is acknowledged and will be forwarded to the Planning Commission for consideration during adoption of the Subarea Plan. There are currently no plans to revise the "Skagit Regional Airport land Use Compatibility Study" which established the safety zones.*

**Skagit County Parks and Recreation**  
**Bob Vaux, Director**

*Letter dated May 30, 2003 (198)*

**Comment 1.** Impact from Bayview Subarea development needs to be assessed in regards to existing regional park deficiencies, especially relative to the inadequacy of current funding sources.

**Response 1.** *Your comment is acknowledged. Please see revised Section 3.5.3 of the FEIS.*

**Comment 2.** It appears that the Plan adequately addresses the need for open space.

**Response 2.** *Your comment is acknowledged.*

**Comment 3.** Although the Community Park described in the Plan would meet the Subarea need for a number of years, the funding is not committed in the Capital Facilities Plan. The use of Impact Fees should be dropped because the current Voluntary Impact Fee program will not begin to adequately provide for the need. The cost is 1.6 million in 1998 dollars.

**Response 3.** *Your comment is acknowledged. Please see revised Section 3.5.3 of the FEIS.*

**Comment 4.** The DEIS does not address impacts on Special Use recreation areas, specifically an Indoor Recreation Center.

- An Indoor Recreation Center is the highest priority and most needed recreational facility in Skagit County. Development within the Subarea will increase the need for this facility. Although the current Parks and Recreation Comprehensive Plan suggests a location along the I-5 corridor in Burlington, this facility could be located in the Bayview Subarea and still meet the Comprehensive Plan objectives given the proposal of a community park.
- The Subarea Plan must consider helping to address its share of regional parks and recreation needs

**Response 4.** *Your comment is acknowledged. Please see revised Section 3.5.3 of the FEIS.*

**Comment 5.** Trails are another high priority Parks and Recreational issue that needs to be covered in the Subarea Plan. Development in the Subarea should include connector trails to the following existing trails:

- Port Trail

- Padilla Bayshore Trail
- Padilla Bay Interpretive Center
- City of Burlington.

**Response 5.** *Your comment is acknowledged and will be forwarded to the Planning Commission for their deliberations during adoption of the Subarea Plan.*

**Comment 6.** There is strong support from the Parks and Recreation Advisory Board for development in the Bayview Ridge Subarea to include impact fees to pay for the needed parks development and improvements. The Board would like to see Subarea impact fees pay for the Community Park, a portion of the Indoor Recreation Center, and the connector trail systems. A system of credits and bonuses promoting construction of park amenities by developers is also encouraged.

**Response 6.** *Your comment is acknowledged and will be forwarded to the Planning Commission for consideration during deliberations on adoption of the Subarea Plan.*

**Skagit County Public Works Department**  
**Steve Flude, P.E., Asst. County Engineer/Asst. Public Works Director**

*Letter dated May 29, 2003 (200)*

**Comment 1.** Several tasks required within the Bayview Ridge Subarea Plan Development Standards section have implications for County development reviewers:

- Who will be responsible for the tracking system proposed in Section 14.28.020 (5) to account for exempt development? How would such a tracking system be developed?
- Who will do the Project Concurrency review evaluating proposed development described in Section 14.28.030?
- Who will be issuing the Certificate of Capacity required by Section 14.28.040 (c)?
- Who will be responsible for the task of notifying the applicant and Planning & Permit Center of results of the Concurrency Determination within 30 days as required by Section 14.28.040 (e)?

**Response 1.** *Your comment is acknowledged and will be forwarded to the Planning Commission for consideration during their deliberations on adoption of the Subarea Plan and Development Regulations. It should be noted that these regulations have been in place since 2000, and are not proposed for amendment at this time.*

**Comment 2.** A conflict exists between Sections 14.28.040 (h) and (c) relative to who issues the Certificate of Capacity.

**Response 2.** *Your comment is acknowledged and will be forwarded to the Planning Commission for consideration during their deliberations on adoption of the Subarea Plan and Development Regulations. It should be noted that these regulations have been in place since 2000, and are not proposed for amendment at this time.*

**Comment 3.** Skagit County Public Works will be adopting the Highway Capacity Manual with the Transportation System Plan and the Birdsall Method will no longer be used to assess the County Road System Concurrency as stated in Section 14.28.060 (1).

**Response 3.** *Your comment is acknowledged. Skagit County is now in the process of amending Section 14.28.060.*

**Comment 4.** Section 14.28.105 1) b) sets up two road standards for the Bayview Ridge UGA to which County Public Works objects.

**Response 4.** *Your comment is acknowledged and will be forwarded to the Planning Commission for consideration during their deliberations on adoption of the Subarea Plan and Development Regulations.*

**Comment 5.** Clarification is needed as to the basis of determining credit for prior contributions and improvements included in the Subarea facilities plan indicated in Section 14.28.105 3).

**Response 5.** *Your comment is acknowledged and will be forwarded to the Planning Commission for consideration during their deliberations on adoption of the Subarea Plan and Development Regulations.*

**Comment 6.** A conflict or redundancy exists between Section 14.28.110 (1) Annual Concurrency Assessment and other sections setting up Concurrency review:

- Section 14.28.020
- Section 14.28.030
- Section 14.28.040
- Section 28.14.060

**Response 6.** *Your comment is acknowledged and will be forwarded to the Planning Commission for consideration during their deliberations on adoption of the Subarea Plan and Development Regulations. Chapter 14.28 has been modified to reflect the most current code amendments.*

**Comment 7.** The setbacks in the Bayview Ridge Subarea are not consistent with those within corresponding County zones.

**Response 7.** *Your comment is acknowledged and will be forwarded to the Planning Commission for consideration during their deliberations on adoption of the Subarea Plan.*

**Comment 8.** Regarding truck access to the Subarea from SR 20, the Subarea Plan does not acknowledge the new traffic signal at SR20/Farm to Market Road, and also states that the lack of signalization along SR 20 at Pulver Road and Higgins Airport Way is forcing trucks onto Peterson Road “adversely impacting residential areas”. County traffic studies along Peterson Road do not show a significant increase in commercial traffic in the last few years.

**Response 8.** *Your comment is acknowledged. The initial text of this section of the Subarea Plan was written prior to installation of the new signal at SR20/Farm to Market*

*Road. Please see updated text regarding the signalization at Farm to Market Road and the SR 20 Fredonia to I-5 Interchange Improvement project.*

**Comment 9.** Avon Allen Road, Peterson Road, Farm to Market Road, and Josh Wilson Road all have the same T-3 FGTS classification as Ovenell Road, but this is not stated.

**Response 9.** *Your comment is acknowledged. Please see revised Section 3.4.1 - Skagit County Roads of the FEIS. The correction to the Subarea Plan also has been made.*

**Comment 10.** The Subarea Road System map identifies the two new roads as “Major Collectors”; these roads will not meet the criteria for such a facility.

**Response 10.** *Your comment is acknowledged. The correction to the map has been made.*

**Comment 11.** There is no problem with the mention of the Birdsall methodology.

**Response 11.** *Your comment is acknowledged.*

**Comment 12.** The SR 20/Avon Allen Road is signalized and is not at LOS E, nor is the nonsignalized intersection at Higgins Airport Way. This should be confirmed with WSDOT.

**Response 12.** *Your comment is acknowledged. More current information obtained from the WSDOT 2003 SR 20 – Fredonia to I-5 Interchange Traffic Report has been added to the Transportation sections of both the Draft Subarea Plan and the Final EIS.*

**Comment 13.** Traffic Engineering believes that the installation of the new traffic signal at SR 20/Farm to Market Road is much more significant to commercial traffic than the Plan suggests. We believe that commercial traffic increasingly using Farm to Market Road to access eastbound SR 20 and Josh Wilson Road to access northbound Interstate 5.

**Response 13.** *Your comment is acknowledged. Please see updated Draft Subarea Plan Transportation text.*

**Comment 14.** An additional benefit of delaying implementation would be to incorporate the findings of the *Bayview Watershed Stormwater Management Plan* into the decision making process.

**Response 14.** *Your comment is acknowledged and will be forwarded to the Planning Commission for consideration during their deliberations on adoption of the Subarea Plan. Also, please refer to the revised text of Section 2.1.5 of the FEIS.*

**Comment 15.** The County's stormwater plan is called the *The Bayview Watershed Stormwater Management Plan*.

**Response 15.** *Your comment is acknowledged. Please refer to the revised text of Section 3.1 of the EIS.*

**Comment 16.** The fact that Drainage District 8 is being annexed by Dike District 12 should be reflected throughout the DEIS.

**Response 16.** *Your comment is acknowledged. Please refer to the revised text of Section 3.1.1.1 of the EIS.*

**Comment 17.** The *Bayview Watershed Stormwater Management Plan* will contain a capital facilities program and will lay the groundwork for a financing plan, but will not include a specific financing plan.

**Response 17.** *Your comment is acknowledged. Please refer to the revised text in Section 3.1.1.3 of the EIS.*

**Comment 18.** Within Bayview Ridge, water quality impacts from new development will be dealt with on site. The *Bayview Watershed Stormwater Management Plan* will primarily address water quantity issues.

**Response 18.** *Your comment is acknowledged. Please refer to the revised text in Section 3.1 - Water of this EIS.*

**Skagitonians to Preserve Farmland (SPF)**  
**Bob Rose, Executive Director**

*Letter dated May 29, 2003 (207)*

**Comment 1.** SPF supports the premise that areas outside of existing cities and UGAs are necessary to accommodate projected county growth over the next 20 years. Absent alternative areas for the projected population to find housing, low-density rural residential development would pose a significant threat to the future sustainability of the Skagit County Agriculture Industry. Housing should occur on surrounding hills or by increasing density in cities.

**Response 2.** *Your comment is acknowledged and will be forwarded to the Planning Commission for consideration during their deliberations on adoption of the Subarea Plan.*

**Comment 2.** SPF strongly supports the proposed policy to designate the Bayview residential zone as a “receiving zone” for a transfer of development rights (TDR) program to preserve prime valley farmland. Section 1-8 of the DEIS is consistent with SPF’s concerns to minimize impacts to farmland. Questions should be raised whether even higher densities in specific locations might provide both economies of scale and more focused land use, allowing protection of open space and natural features as a trade-off.

**Response 2.** *Your comment is acknowledged and will be forwarded to the Planning Commission for consideration during their deliberations on adoption of the Subarea Plan.*

**Comment 3.** There must be no net impact on actively farmed land and its necessary drainage system as a result of upland development. This outcome can be achieved in two fundamental ways: ensuring that the amount, timing, and quality of upland water flows are kept at the same levels as today; or providing for increased drainage system size, maintenance, and repair as well as guarantees on the water quality inputs from the upland development. All alternatives will have drainage impacts especially for Districts 19 and 14. Joe Leary Slough is of special concern.

**Response 3.** *Your comment is acknowledged and will be forwarded to the Planning Commission for consideration during their deliberations on adoption of the Subarea Plan.*

**Comment 4.** SPF supports proposed measures to improve drainage issues, especially recognition of the need for legally binding agreements with Drainage Districts and the County Drainage Utility. SPA also supports the proposed mitigation measures,



most specifically to include goals and policies related to storm drainage in the Subarea.

**Response 4.** *Your comment is acknowledged and will be forwarded to the Planning Commission for consideration during their deliberations on adoption of the Subarea Plan.*

**Gerald Steel, P.E.**  
**(on behalf of Skagit County Growthwatch)**

*Letter dated May 30, 2003 (223)*

**Comment 1.** The Bayview Ridge Subarea DEIS should more fully consider the negative environmental impacts of the inclusion of a residential component within the UGA:

- Current population projections are below those the projections upon which the Comprehensive Plan is based. The County is planning for more residential growth than is actually necessary.
- Consideration of residential growth being located within the UGA should not occur until the December 2005 revision of the Comprehensive Plan.
- The capacity of existing municipal UGAs to accommodate needed residential growth should be more fully explored.

**Response 1.** *Your comment is acknowledged. The current Skagit County Comprehensive Plan and Countywide Planning Policies assume a 2015 population of 137,700. Per the Comprehensive Plan, 80% of this population must be accommodated within urban growth areas (UGAs).*

*Allocation of the population to individual UGAs is accomplished through the Framework Agreement among Skagit County, the City of Burlington, the City of Mount Vernon, the City of Anacortes, the City of Sedro Wooley, and the Town of LaConner. The population allocations resulting from this process resulted in a 3,420 population allocation for Bayview Ridge. A population of 909 from the former Big Lake UGA remains unallocated. These allocations are being updated, but the process is not complete. The impact of these allocations to municipal UGAs is beyond the scope of this EIS.*

*See also Response 1 to John Sitkin.*

**Comment 2.** Transformance of governance from the County and special districts to cities should be more fully explored for efficiency and local control.

**Response 2.** *Your comment is acknowledged and will be forwarded to the Planning Commission for their consideration during deliberations on the Comprehensive Plan.*

**Comment 3.** Safety aspects of separating the airport and industrial uses from high-density residential uses should be more fully explored.

**Response 3.** *Safety aspects related to the airport and surrounding land uses were examined in the Skagit Regional Airport Land Use Compatibility Study (June 2000). This study resulted in adoption of the Airport Environs Overlay Zone, which includes six distinct safety zones. These safety zones are shown for each Subarea Plan Alternative in Figures 3 through 6 of the EIS.*

**Comment 4.** Impacts on traffic, air pollution from traffic, and lost commute time should be more fully explored.

**Response 4.** *Your comment is acknowledged. As discussed in Section 3.4.2 of the EIS, the most significant traffic volume impacts relate to travel on SR 20. These impacts are a result of both trips generated within the Subarea, and the continuing increase of traffic volume on SR 20 independent of the Subarea. Section 3.4.1 of the EIS has been updated to reflect the current status of the SR 20 I-5 to Freedomia improvement project.*

**Comment 5.** The impact of residential growth on the long-term expansion needs of the airport and industrial UGA has not been adequately described.

**Response 5.** *Your comment is acknowledged. Expansion needs of the Airport are addressed in the Skagit Regional Airport Master Plan Update (1995). Growth of the industrial area has been examined most recently in the “SR 20: Sharpes Corner to SR 536 NEPA Pilot Project Dwelling Unit and Employment Forecasts for Transportation Analysis Zones” (CH2Mhill, December 2001).*

**Comment 6.** Skagit County Growthwatch is concerned that a residential UGA will lead to more inefficient provisions of urban services and will encourage further encroachment on lands now used for agriculture.

**Response 6.** *Your comment is acknowledged and will be forwarded to the Planning Commission for consideration during their deliberations on adoption of the Subarea Plan.*

**Comment 7.** Current regulations requiring a landscape buffer around Industrial zones should be retained.

**Response 7.** *Your comment is acknowledged and will be forwarded to the Planning Commission for consideration during their deliberations on adoption of the Subarea Plan.*

**Port of Skagit County  
Letter Dated May 20, 2003**

**Comment 1.** Skagit Regional Airport is one of three essential public facilities in the County, and is the foundation for the Bayview Business and Industrial Park. Combined, the airport and Business Park have 50 businesses and 1,000 direct employees. The Subarea Plan is the logical extension of the UGA planning process and is mandated by the Growth Management Hearings Board.

**Response 1.** *Your comment is acknowledged and will be forwarded to the Planning Commission for their consideration during their deliberations regarding adoption of the Subarea Plan.*

**Comment 2.** The airport has existed for 70 years, and has served as an air transportation hub and center for economic development activity in county for more than 20 years.

**Response 2.** *Your comment is acknowledged and will be forwarded to the Planning Commission for their consideration during their deliberations regarding adoption of the Subarea Plan.*

**Comment 3.** Providing for growth in this area is healthy and necessary for the County. At the same time, care must be taken to protect the viability of the airport operations for the future of Skagit County. Under the GMA, the Subarea planning process must help protect this essential public facility. Airport operations should not be restricted or cease because of encroachment by urban development.

**Response 3.** *Your comment is acknowledged and will be forwarded to the Planning Commission for their consideration during their deliberations regarding adoption of the Subarea Plan.*

**Comment 4.** The preferred alternative presented by staff, which includes common sense measures proposed by the Port, balances the industrial and residential development needed by the County and protects the airport as an essential public facility.

**Response 4.** *Your comment is acknowledged and will be forwarded to the Planning Commission for their consideration during their deliberations regarding adoption of the Subarea Plan.*

#### 4.4 Oral Comment Summary

The following oral comments were made at the May 20, 2003, public hearing with the Skagit County Planning Commission. All these comments referred to the Subarea Plan.

##### Speakers

##### **Brad Furlong – Port of Skagit County**

Reviewed history of Skagit Regional Airport and 1995 Airport Master Plan. Explained potential for curtailment/closure of airports due to development around their perimeters. New neighbor complaints have “strangled” airports.

State of Washington GMA – includes efforts to protect airports. Port has chosen to participate in the Bayview Ridge planning process. Port has developed three areas of mitigation/common sense measures to protect the airport – aviation easements, formal maps showing noise contours and FAA height limitations, and completion of a notification and acknowledgment of the overflight effects. Public has a long-term investment in the airport. The airport is an important part of the economic health of the County. The airport is a designated Essential Public Facility.

##### **John Ravnik, on behalf of Burlington-Edison School District**

The School District does not take sides on a project. As schools become full, the District will proceed with development of a new school facility. The District’s greatest challenge is acquisition of a suitable site; the District asks that the County be supportive of the need for schools to be located near residential areas.

##### **Philip Serka, Attorney representing Kraig and Roger Knutzen**

Knutzens own 27 acres in NE corner of Subarea – not proposed as BR-R, but as Urban Reserve (and surrounded by residential). Asking for BR-R. Urban level of services are available. Also, the County should study impacts from upland drainage first, and implement controls, so there will be no impacts to downstream properties (i.e., farmlands). There is no discussion yet of how impacts to downstream properties will be resolved. Detention requirements only reduce peak flow – increased total runoff is also detrimental to the system. Drainage District 14 has conducted a study, which concludes that development within Bayview Ridge should mitigate for increases in volume of runoff, instead of peak runoff. This issue should be resolved before the zoning is adopted. Drainage Districts do not have the resources to mitigate problems on their own. The draft Plan recognizes the problem, but need implementation.

##### **Randy Good**

Supports the CAC recommendations with the following suggestions/concerns: Wetlands map is not made regulatory, Property Rights Policy be included, and concern regarding drainage along Higgins Way and SR 20.

##### **Audrey Dorai**

Question regarding number of dwelling units proposed.

**John Shultz, representing Dike District No. 12**

Dike District No. 12 is now annexing Drainage District 8. Very concerned regarding impact to lower farms from upland development – delays plantings due to excess water. Dike District 12 is low on resources – can't handle the drainage problem. Don't object to change in zoning, but want more study done regarding drainage. Should be requirements for developers to deal with drainage.

**Tim Lewis, Skagit Airport Port Association and Corporate Air Center**

The Airport is an essential Public Facility and an important business entity. The long-term existence of the airport must be taken into account. Open space critical to us.

**Kim Johnson**

The CAC was really a developer-driven advisory committee. The draft Plan proposes 3,500 people within a one-mile radius of a working airport. Airports and residents do not mix well (noise, danger). Also, because of airport, the Subarea cannot have urban uses such as grocery stores, gas stations, schools. Existing school is over-capacity now. Impact fees are not enough. Transportation costs? Generally, many questions and no answers. Drainage impacts to lower farmland. Increased traffic, especially trucks using Peterson Road. Proposed traffic improvements? Plan threatens my slower way of life. I do not wish to live in a city.

**Shane Gildnes**

We already have a thriving community that would be disrupted by 3,000 additional people.

**Charles Bennett, Dike District No. 12**

Concern regarding drainage. Quality is an issue, as well as quantity from upland development. If water quality monitored at the outlet, it will be the drainage district that must clean it up.

**Susan Henry**

Very much opposed to residential component – not justified, not appropriate close to the airport. The Subarea is separated from goods and services that are provided by a city. Because of the airport, the area will never be a self-sufficient urban community. Also, object to make-up of CAC. If Plan must have at least four units per acre for the residential area, it should not be in the Plan.

**Bill Henry**

Owners of large parcels drafted a plan, then formed a CAC to legitimize it. Statistics are correct, but interpreted incorrectly. Density issue – 77% of homes on lots of one-third acre or less, versus 681 homes on 738 acres (1 unit/acre). He chose to live between the airport and agriculture activities – placing urban density between the two does not make sense. Given GMA requirement for 4 units/acre for urban development, residential component should be dropped. Airport and business park should remain within UGA. County should encourage citizens to foster a Subarea Plan for the balance of the entire Bayview Ridge.

**Kristen Lovell**

Many concerns – damage to wetlands (political connections effect enforcement), overcrowded schools, Olympic Pipeline (County is unaware of the location). Many residents feel there has been a lack of respect for fairness and expectations. We moved here for the rural environment – not urban. New residents shouldn't get more respect than present residents. Present landowners should be compensated for change in value. Proposed Plan is a complete failure. Residential component needs to be removed.

**Teddy Hickox**

What happens in Bayview Ridge will impact West Burlington. Increased traffic (especially SR 20), need for new jobs, churches, police, fire services. Peterson Road to be closed at the railroad tracks.

**Paul Taylor, Drainage District 14.**

County should do the Drainage Plan first, then decide where to put additional development. Also, we are allowing the GMA "tail" to "wag the dog." Our biggest asset is our rural land. Should have more choices than 1 unit/4 acres or 1 unit/10 acres. Should encourage industry around an airport, but not residential development. There is a lack of commercial development. Should look at the whole Ridge. The UGA/GMA requirements shouldn't dictate.

**John Shambaugh, Department of Transportation, Aviation Division**

The Draft Plan meets the compatibility language developed by the Aviation Division.

**Robert Hilton**

The consortium of developers should build a test home and then measure sound levels, vibration levels, especially during winter when we get lots of convection. The acoustical problem has not been fully appreciated yet. Also, the taxpayers in the County shouldn't have to pay for/be sued as a result of an accident.

**Kraig Knutzen**

Knutzen farmland at the base of Bayview Ridge is totally dependent on drainage for production of economic crops. Five generations of family have worked to develop a private drainage system that will fail if too much water comes at the wrong time. Bayview Ridge water will be forced into this system. The proper location for residential and commercial development is on the hill, but before the UGA is approved, the proper mitigation plan for drainage must be set forth.

**Cindy Jacobson**

Residential growth may eventually close down the airport. New residential growth could be located by Avalon Golf Course.

**Brad Spangler**

If you want to protect the airport, reduce the residential component. To maintain the existing value of homes, you should maintain the same density. Alternative 3 provides for an additional 2,300 homes in the urban reserve area. If you have to have 4 units/acre, the balance should be in perpetual open space. The open space should be as close to the Port as possible.

## 4.5 Comments On The Bayview Ridge Subarea Plan

Many of the letters received during the comment period on the Draft EIS addressed issues related to the Draft Subarea Plan, rather than the Draft EIS. The issues raised in these letters are summarized below:

### Land Use

**Residential intensity/density issues and land values**– Proposed residential density is too great. Rural character would be lost. Negative impacts of urban development include noise, traffic, safety, quality of life, property values, loss of scenic quality and views, over crowding, and loss of open space. Concern for impacts for inclusion of low-income housing.

### Impacts to the Airport

Especially related to future airport growth and expansion and associated compatibility issues with respect to higher density residential development.

### Drainage

Drainage problems will result from more intense development and will adversely impact farmlands. The following issues should be addressed before more development is allowed.

- Increased impervious surface
- High till layer
- Badly placed drainage ditches and culverts
- Limits of the existing drainage utility
- Subdivisions are not required to plan for drainage related to locations above steep slopes
- Cost of financing necessary improvements to fix area drainage
- Plans for mitigation of drainage related to the proposed UGA and residential development (including roads and drainage ditches) should be in place prior to approval of the UGA and should apply DOE guidelines.
- Completion of the *Bayview Watershed Stormwater Management Plan* is necessary.
- Review of permit application should be coordinated with respective drainage districts.
- County should provide adequate monitoring throughout the permit process.
- Dike District #12 is annexing Drainage District 8. District is concerned about impacts of water run-off (both quantity and quality). Recent development has resulted in impacts to lower farmlands.

### Community and Public Services

Problematic due to proximity to the airport. Retail and commercial services, churches, and adequate health care facilities will be lacking. County staff and representative should support the school district's need to find and develop school district sites near the residential areas they serve. Regulations related to the airport will not allow another school to be built in the area. Students will need to be bussed out of the area to attend schools.



Building constraints relating to the airport prevent adequate public facilities to accommodate an urban density and conflict with the intent of the GMA. If the past steady rate of growth has been too fast for current services to keep pace, the proposed intensity of growth will not be concurrent with provision of urban services.

#### **Traffic Related Impacts**

Traffic congestion will increase. Peterson Road will be subject to increases in both automobile and truck traffic. Congestion on SR 20 and Subarea intersections will worsen. Bicycle transportation would be negatively impacted. School bus stops on Peterson Road would be dangerous.

#### **Increased Tax Burden**

Concern for the cost of poorly conceived planning for the area. Impact on a financially strapped school district. Since developers are the sole beneficiaries of the residential density proposed in the Subarea Plan, they should be the ones that pay for all road impact costs. Bayview Ridge residents have the highest property taxes in the county and the proposed residential density will result in higher taxes combined with lower property values.

#### **Safety issues**

Residential development and a school near expanding industrial, airport areas and Skagit Sanitation is not advisable. Terrorism and crime will result from locating residential development in the vicinity to airport and industrial areas. Olympic Pipeline has a pipeline and storage facilities in the area (5 feet from the proposed residential area).

**Redirect Growth** - Bow Hill is offered as a better location for residential development. The Subarea should not have more than its share of residential growth. Residential development spread evenly throughout the county will lessen the burden on road and environmental systems. Many letters recognized a need for more residential growth in the area, but question the degree of growth proposed.

**Environmental Issues** – Potential impacts to wetlands and whether wetland regulations will be fair and equitable. A concern for the balance of the ecosystem relative to increased residential density.

**Impacts Beyond the Subarea** – Traffic safety and air quality impacts to residents outside the boundaries but in the vicinity of the Subarea.

#### **Boundaries of the Urban Growth Area (UGA)**

Requests that certain properties (Herdt, Jensen, Knutzen) be placed within the UGA.

#### **Opposition to Airport Environs Overlay**

Specifically, to the requirement for an aviation easement.

### Process Issues

The CAC was not sufficiently representative to area residents; a new, objective, and different CAC is necessary. Has the appearance of fairness doctrine been violated? The public was not well informed of the plans.

**Endorsement of Development on Bayview Ridge** - This Subarea Plan directs growth away from the flood plain, avoids development impacts on farming, drainage and run-off problems can be solved, traffic impacts can be solved, there is a good new school and others can be built in the area, there is a need in the area for high density housing, planned, large scale residential development is preferable to small lot development where drainage issues will not be addressed.

**The Impact of the Bayview Ridge Subarea on Skagit Regional Airport** – The Skagit Regional Airport is an Essential Public Facility, the largest airport in the County and the foundation for the Bayview Business and Industrial Park. The airport is an air transportation and economic development center. Providing for growth in this area is healthy and necessary. At the same time, care must be taken to protect the viability of the airport operations for the future of Skagit County. Also, protection of the airport is required under the GMA. The Subarea planning process must help protect this essential public facility. The Preferred Alternative includes the following “common sense measures” to balance the need for industrial and residential growth and protection of the airport: avigation easements; publication, recordation, and incorporation of noise and safety maps; airport environs disclosure; and the Port’s claim to prescriptive easements.

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