



Wednesday, May 25, 2022

Board of County Commissioners

Skagit County Board of County Commissioners
1800 Continental Place
Mount Vernon, WA 98273

Via Hand Delivery

RE: Skagit County's 2022 Docket of Proposed Policy, Code and Map Amendments

Dear Commissioners:

Thank you for the opportunity to comment on the proposed 2022 Comprehensive Plan Amendments. Skagitonians to Preserve Farmland's (SPF) comments are narrowly focused on items **LR22-02** and **LR22-05**.

Regarding Docket item LR22-02, Skagit Partners Fully Contained Communities Amendment

SPF urges the Board of County Commissioners to **exclude** this proposal from the 2022 Docket. The staff recommendation to docket, and then defer the proposal, is redundant to the existing FCC proposal already docketed and deferred per **Skagit County Resolution 20220010 Clarifying Comprehensive Plan Amendment Docket No. LR20-04** (passed January 20, 2022) pending action by the Growth Management Act Steering Committee.

The SPF Board of Directors also urges you to **deny** deferred docket item **LR20-04**. Over 2,000 Skagit County voters have spoken through the *Right Growth Right Place* campaign's website and petitions that Fully Contained Communities (FCCs) are not an appropriate growth management solution for Skagit County. SPF is a founding member of the Right Growth Right Place campaign.

Regarding LR22-05, Farmworker Housing Agricultural Accessory Use Amendment

SPF urges the Board of County Commissioners to **exclude** this proposal from the 2022 Docket and instead initiate a Work Plan to update the *Housing Element* of Skagit County's Comprehensive Plan with an emphasis on workforce housing, including agricultural workforce housing.

The current proposal, while on its face appears to be a minor code change, in reality represents a narrowly focused and piecemeal approach to the broader issue of housing in Skagit County that will have profound policy implications and the complete devastation of Ag-40 zoning in Skagit County. The Ag-40 zoning is the cornerstone of Skagit County's agricultural land base and is one of the principal reasons Skagit County is one of just two fully functioning agricultural economies remaining in Puget Sound. The current proposal amounts to a *de facto* rezoning of over 66,000 acres of prime farmland within the Ag-NRL zoned lands of Skagit County.

SPF is concerned about the proposal's impact to the long-term viability of Skagit County agriculture. As a stand-alone proposal, LR22-05 is disconnected from the Housing Element of Skagit County's Comprehensive Plan, lacking in recognition of the need for coordination with federal, state and local governments that all have a piece of the housing puzzle in Skagit County.

Practically speaking, on its face, there is no way for Skagit County to regulate and enforce *agricultural worker only* occupancy as suggested in the proposal, resulting in the proliferation of multi-family housing projects within the rural agricultural working lands of Skagit County. This runs counter to over 50-years of zoning protecting the agricultural land base from development and over 30 years of GMA requirements to identify and protect agricultural lands of long-term commercial significance from conversion to housing and other non-agricultural uses.

The Board of County Commissioners has already taken action to increase housing availability in unincorporated Skagit County with the relaxation and expansion of Accessory Dwelling Unit (ADU) requirements as part of approving the 2021 Docket (Ordinance 020220003). These expanded ADU provisions will ultimately make it easier to double the density of legal building lots of record within Ag-NRL zoned lands (as well as throughout all unincorporated Skagit County).

Additionally, **Co-Housing** is already an allowed and permitted use within Ag-NRL zoned lands. Skagit County defines Co-Housing as:

a type of residential community characterized by either attached or detached single-family dwelling units which may or may not be located on separate lots, and includes a common building, which may contain a large dining room, kitchen, lounges, meeting rooms, recreation and laundry facilities, storage, guest rooms, library, workshops, and/or childcare, to serve only the co-housing community.

The County's definition above allows seasonal and permanent farmworker housing within Ag-NRL zoned lands; we believe the allowance for Co-Housing should be part of a larger County work plan to better understand how or why this is or isn't working to help with agricultural workforce housing for the agricultural industry.

We recognize the serious chronic and acute issue of housing affordability in Skagit County, including workforce housing the agricultural industry and other employers need. Therefore, we are urging the Board of County Commissioners to initiate a work plan to update the Housing Element of Skagit County's Comprehensive Plan this year, with emphasis on workforce housing, as part of the larger GMA updates required to begin next year.

This work plan should include coordination and collaboration with federal, tribal, state and local governments along with community stakeholders engaged in workforce housing issues. The work plan should also include for evaluation and consideration, the role Skagit County's Farmland Legacy Program can play as a tool in creating opportunities to permanently preserve our remaining farmland in conjunction with potentially updated Co-Housing and CaRD policies and regulations.

We also believe this housing work plan is an opportunity to revisit the recommendations from the Envision 2060 Citizens Committee Final Report to consider how implementing an inter-County Transferable Development Rights (TDR) program can be utilized as a potential tool to assist in addressing workforce housing without adding additional building lots within our rural working lands.

Thank you again for allowing us this opportunity to provide public comment. If you have any questions about our comments please do not hesitate to contact me by phone at 360-336-3974 or by e-mail at allenr@skagitonians.org.

Sincerely,



Allen Rozema
Executive Director