

TO: Jefferson County Board of Commissioners
FROM: Jefferson County Planning Commission
DATE: February 6, 2002
SUBJECT: Planning Commission recommendation regarding Brinnon Subarea Plan and associated amendments to the Unified Development Code (UDC)

ATTACHMENTS:

- Item 1: Planning Commission-recommended version of the Brinnon Subarea Plan, dated January 16, 2002
- Item 2: Recommended UDC amendments to implement the Brinnon Subarea Plan
- Item 3: Planning Commission Minority Report regarding Brinnon Subarea Plan and associated UDC amendments

The Jefferson County Planning Commission enters the following procedural Findings:

1. RCW Chapter 36.70A, *et seq.*, also known as the Growth Management Act ("GMA"), allows counties planning under the GMA to adopt subarea plans that are consistent with their comprehensive plans.
2. Jefferson County adopted the current Jefferson County *Comprehensive Plan* August 28, 1998. The *Comprehensive Plan* has been amended since adoption. The Brinnon Subarea Plan is the first subarea plan proposed to be included in the *Comprehensive Plan*.
3. On December 18, 2000, Jefferson County adopted the Unified Development Code ("UDC") as the implementing regulations for the *Comprehensive Plan*. The UDC, as amended, provides for the initial adoption of a subarea plan as an exception to the annual *Comprehensive Plan* amendment process (UDC 9.3.1.b), in compliance with the GMA. Amendments to the UDC can be considered at any time (UDC 9.9.1).
4. The Planning Commission recommends a Brinnon Subarea Plan to implement the Jefferson County *Comprehensive Plan* goals, policies and directives to promote "bottoms up" community planning and to increase economic development potential in South County consistent with the rural character of the community. In particular, the Brinnon Subarea Plan is intended to implement land use policy 4.8 (LNP 4.8 at page 3-70) in the *Comprehensive Plan*, which states, "Assist the community of Brinnon, within the limits of available resources, in a public process to investigate the feasibility of an additional location for future commercial development, through a comprehensive study to examine factors including but not limited to environmental

issues, economic viability, future growth projections, and infrastructure requirements, consistent with GMA requirements.”

5. The *Comprehensive Plan* text, at pages 3-14 and 3-19, describes the economy of the Brinnon area as “distressed” and promotes the diversification of the South County economy.
6. Jefferson County adopted a community plan for Brinnon on January 20, 1982 via Resolution 9-82. In the early 1990s, the Brinnon community updated the Brinnon community plan and submitted the updated version to the County in May of 1995. The 1995 Brinnon community plan itself was not adopted, but information from the 1995 plan was incorporated into the 1998 Jefferson County *Comprehensive Plan*.
7. As set forth in these findings, the opportunities provided for meaningful citizen participation employed in this review and amendment process are wholly consistent with the requirements of the GMA (§§ 36.70A.035, 36.70A.130, and 36.70A.140 RCW). The Planning Commission specifically finds that the public has been provided with effective notice and early and continuous opportunities to review and meaningfully comment upon, and influence the substance of the Brinnon Subarea Plan.
8. On September 27, 1999, the Board of Commissioners moved to engage consultant David Whipple to prepare a Community Development Block Grant (“CDBG”) application for the Brinnon subarea planning process.
9. On October 25, 1999, Director of Community Development Al Scalf met with residents of Brinnon interested in participating in a Brinnon community planning committee that would focus on the development of a Brinnon Subarea Plan.
10. On November 1, 1999, the Board of Commissioners moved to sanction the subarea planning process in Brinnon and to use the June 1994 “Jefferson County Community Planning Guidelines” (a.k.a., the “Blue Book”) as a guide for the process. The Blue Book was developed for the community planning process prior to the development and adoption of the 1998 *Comprehensive Plan*. Some of the guidelines within continue to be useful for post-*Comprehensive Plan* adoption subarea planning.
11. Through Resolution No. 29-00 approved and adopted April 3, 2000, the Board of Commissioners made policy statements regarding the development and adoption of a Brinnon Subarea Plan, including the statement that, at 14. on page 3, “The Board hereby states that it will look favorably upon future comprehensive plan amendments relating to ‘South’ county, including, but not limited to, proposed plan amendments that relate to commercial development there, if any particular plan amendment for the ‘South’ county is supported by the appropriate growth management indicators, complies with the Growth Management Act (including SB 6094) and holds the support of the citizenry residing there.”
12. The Draft Brinnon Subarea Plan was developed by the Brinnon Subarea Planning Group (“Planning Group”), which was appointed by the Jefferson County Board of Commissioners by motion on November 22, 1999. Membership opportunity was advertised in the official newspaper of record, the *Port Townsend & Jefferson County Leader*. Persons interested in being members of the Brinnon Subarea Planning

Group submitted letters of interest to the Commissioners, who then appointed all who submitted such letters, a total of 15 Brinnon citizens, some of whom had served in similar community planning efforts that culminated in the Brinnon community plans of 1982 and 1995.

13. The “start-up” community meeting described in the Blue Book was held on December 2, 1999. The Planning Group selected a Chair (Linda Tudor) and a Recorder (Kate Marsh). Commissioner Wojt handed the gavel to Ms. Tudor. The Planning Group appointed two additional members.
14. In April of 2000, the Planning Group added another member. Subsequently, two members submitted letters of resignation. No other official actions to add or dismiss members were taken by the Planning Group. Therefore, the official Planning Group membership was 16. However, only 12 members were present on August 28, 2001 at the Planning Group meeting at which the Planning Group reached consensus to forward a Draft Brinnon Subarea Plan to the Board of Commissioners for consideration. Generally, these 12 members most consistently attended the Planning Group meetings in the year 2001 and constitute “final membership.”
15. The Planning Group developed the Draft Brinnon Subarea Plan in consultation with County staff and a consultant familiar with the GMA over a period from December 2, 1999 to August 28, 2001. The consultant worked with the Planning Group and County staff on this project beginning in the year 2001.
16. Jefferson County contracted a consultant familiar with the GMA, Mark Personius, AICP, of Earth Tech, Inc., using a combination of County general funds and a CDBG issued through the Washington State Office of Community Development (“OCD”) CDBG Program. The Brinnon Subarea Planning Group participated in the selection of the consultant.
17. The County has to date fulfilled the requirements of the CDBG contract with OCD, according to a November 13, 2001 letter from the Managing Director of Community Development Programs addressed to Mark Rose of Brinnon and copied to Jefferson County. Mr. Rose had requested an OCD CDBG Program investigation of Jefferson County activities related to this CDBG for the Brinnon Subarea Plan. Mr. Rose has also appeared before the Board of Commissioners twice to present 14 “grievances” related to the CDBG per a grievance process established by the Board of Commissioners as a requirement of accepting the CDBG. Pursuant to the CDBG grievance process, the Board of Commissioners has responded in writing to Mr. Rose, addressing each of the first 14 grievances submitted. There is one outstanding grievance submitted by Mr. Rose. Jefferson County is working with the assigned Project Manager from the CDBG Program at OCD to execute the close-out procedure of the CDBG.
18. The Planning Group met on a regular on-going basis and provided for timely and effective notice of its meetings to develop and deliberate on the Preliminary Draft Brinnon Subarea Plan through publication in the official newspaper of record, the *Port Townsend & Jefferson County Leader*, as well as through local announcements in the community and word-of-mouth. The Planning Group held meetings almost every second and fourth Tuesday evening from December 2, 1999 to August 28,

2001 in the Brinnon School Library to develop the Preliminary Draft Subarea Plan and eventually the Draft Subarea Plan submitted to the Board of Commissioners. All of the aforementioned meetings incorporated opportunities for public comment and questions. The County GMA files contain minutes from the Planning Group meetings prepared by the Recorder of the Planning Group. Some of the Planning Group meetings were recorded and those audiotapes are stored at the Jefferson County Department of Community Development (“DCD”).

19. At the request of Mark Rose of Brinnon, the Washington State Auditor examined Mr. Rose’s concerns regarding alleged violations of the Open Public Meetings Act and the public records laws in Jefferson County. In a letter to Mr. Rose dated December 5, 2001 and copied to Jefferson County, State Auditor Brian Sonntag stated that, “After careful consideration of this matters, we determined there is no cause to believe there has been a violation of state law.”
20. An “interested parties” mailing list was utilized in the year 2000 to help inform the public of developments in the Brinnon subarea planning process. In the year 2001, the “interested parties” list morphed into an email distribution list. The email list was used for dissemination of announcements, meeting schedules, meeting minutes, and sometimes sections of the working draft of the Subarea Plan.
21. In order to effect a widespread availability of Subarea Plan drafts and associated maps, in the summer of 2000 Jefferson County established a website specific to the Brinnon subarea planning process. The Brinnon Subarea Plan website has been used for announcements and the posting of a variety of documents, including Subarea Plan drafts, associated maps, and information related to the review of the proposal under the State Environmental Policy Act (“SEPA”).
22. The Planning Group drafting of the Brinnon Subarea Plan was an iterative process. The 1995 Brinnon Community Plan served as the foundation for the Draft Brinnon Subarea Plan. Section by section, section drafts were composed by Planning Group members, sometimes with invited participation by interested individuals who were not members of the Planning Group. Compilation “working drafts” of the Brinnon Subarea Plan were released to the interested public, per the prerogative of the Planning Group, over the course of the Planning Group effort and in accordance with the Jefferson County records access policy (i.e., that working drafts are protected from premature release). Per order of the Board of Commissioners on April 16, 2001, all work discussed in public at Planning Group meetings was made available to the public.
23. Various full versions of the Brinnon Subarea Plan were released to the public at various times. An early rough draft version was circulated by at least May 8, 2001. On June 14, 2001, Planning Group members and interested parties were supplied a working draft, which was also sent to the consultant for him to create the first organized and cohesive Subarea Plan draft. This first organized and cohesive draft was compiled by the consultant, dated July 2, 2001, and released on July 3, 2001. The next draft was entitled the “Community Meeting” (Preliminary) Draft because of its distribution prior to a community meeting held in Brinnon on July 31, 2001.

24. Notice of the availability of the July 24, 2001 Preliminary Draft Brinnon Subarea Plan and all subsequent versions was widely distributed and each version was posted on the Brinnon Subarea Plan website maintained by the County. As many hard copies of the Plan as resources would allow were printed and distributed. Plan copies were available for inspection at DCD, at the Jefferson County Public Library, and at some public places in Brinnon, including the US Post Office and the Senior Center. Private citizens unable to access the Plan on the website were supplied a copy of the Plan at cost upon request. An interested Brinnon resident, Ms. Kirie Pedersen, submitted to DCD on June 15, 2001 a list of stakeholders in the Brinnon subarea planning process. DCD emailed and/or mailed notice of the availability of the July 21, 2001 Preliminary Draft Subarea Plan to each and every person on the list submitted by Ms. Pedersen. The list included contacts for the US Navy, the Point Whitney Shellfish Lab operated by the Washington Department of Fish and Wildlife, and the Boy Scouts of America, which operates Camp Parsons in Brinnon.
25. The phone number and email address of the DCD staff contact for the Brinnon subarea planning process was provided with each notice of Subarea Plan draft availability. Interested citizens and agency or group representatives were encouraged to contact the DCD project planner.
26. After timely and effective public notice, the Planning Group held a public community meeting on July 31, 2001 in the Brinnon School Gymnasium to present and to gather public comment on the Preliminary Draft Subarea Plan. Approximately 100 persons were in attendance. A DCD staff member prepared minutes of the community meeting. Audiotapes of the community meeting proceedings are on file at DCD.
27. Among the written comments submitted to the Planning Group were formal comments on letterhead from the Port Gamble S'Klallam Tribe Natural Resources Department. An interested Brinnon citizen forwarded via email to the Planning Group informal comments from the Skokomish Tribe Natural Resources Department.
28. After timely and effective public notice, the Planning Group held public meetings in Brinnon on August 14 and 28, 2001 to review and deliberate public oral and written comment and formulate a recommended Draft Subarea Plan for consideration by the Board of County Commissioners. On August 28, 2001, the 12 members present of the Planning Group reached consensus to forward a Draft Subarea Plan, dated August 28, 2001, to the Board of Commissioners for consideration.
29. Notice of availability of the August 28, 2001 Planning Group-recommended Draft Subarea Plan was disseminated to the public through the County's website and through publication in the official newspaper of record, the *Port Townsend & Jefferson County Leader*.
30. Consistent with the requirements of the GMA, on September 7, 2001 DCD forwarded the proposed Draft Subarea Plan to the Growth Management Program within the Washington State Office of Community Development ("OCD"), a division within the Department of Community, Trade and Economic Development ("DCTED"), for review and comment more than sixty (60) days prior to the anticipated adoption date (§36.70A.106). OCD acknowledged receipt of the notice on September 10, 2001.

On September 14 and 19, 2001 DCD sent notice of the intent to adopt a Brinnon Subarea Plan and availability of the same to the addresses on the list of "AGENCIES REVIEWING COMP PLANS" supplied to DCD by OCD and last updated September 13, 2001.

31. DCD informed the National Marine Fisheries Service ("NMFS") of the intent to adopt a Brinnon Subarea Plan. A NMFS official responded by email on November 1, 2001 that NMFS does not expect to provide comments on the proposed Subarea Plan.
32. Jefferson County received two comment letters from the Growth Management Program of OCD. The letters are dated November 7, 2001 and January 16, 2002 and were reviewed by the Planning Commission prior to their recommendation to the Board of Commissioners concerning the Brinnon Subarea Plan and associated UDC amendments.
33. On September 10, 2001, the Jefferson County Board of Commissioners moved to forward the August 28, 2001 Draft Brinnon Subarea Plan recommended by the Brinnon Subarea Planning Group to the Jefferson County Planning Commission for formal consideration.
34. DCD staff, consultant Mark Personius, and members of the Brinnon Subarea Planning Group presented the Draft Subarea Plan and answered questions before the Planning Commission on September 19, 2001. The Planning Commission scheduled a public hearing on the Draft Subarea Plan for October 17, 2001.
35. On October 17, 2001 and after timely and effective public notice, the Planning Commission held an initial public hearing in the Brinnon School Gymnasium on the Draft Subarea Plan.
36. The Port Gamble S'Klallam Tribe submitted comments and provided oral testimony to the Planning Commission. The Skokomish Tribe Natural Resources Department submitted written comments to the Planning Commission.
37. Other entities and identified stakeholders provided comment to the Planning Commission, including the Brinnon Chamber of Commerce, the Economic Development Council of Jefferson County, the Port of Port Townsend, and the Jefferson County Department of Public Works, some of which had previously commented to the Planning Group.
38. Oral and written comments by citizens and entities ranged from full and enthusiastic support to vehement opposition. In general, more favorable comments were made to the Planning Commission than unfavorable.
39. On December 10, 2001, per GMA requirements DCD mailed OCD notice of intent to amend the UDC in association with the proposed Brinnon Subarea Plan. OCD acknowledged receipt of the notice on December 11, 2001. DCD sent notice of same on December 11, 2001 to the addresses found on the list of "STATE AGENCIES REVIEWING DEV REGS" (development regulations) supplied to DCD by OCD and last updated September 13, 2001.

40. After timely and effective public notice, the Planning Commission held a public workshop meeting in Port Hadlock on December 5, 2001 to commence substantive review of the proposed Brinnon Subarea Plan. After timely and effective public notice, the Planning Commission held public workshop meetings on December 19, 2001; January 2, 2002; and January 16, 2002 in Port Hadlock to review the proposed Brinnon Subarea Plan. All of the aforementioned meetings incorporated opportunities for public comment and questions.
41. At the December 19, 2001 Planning Commission meeting, the Planning Commission requested that DCD develop a line-in/line-out version of the Brinnon Subarea Plan that represented the DCD recommendation based on DCD evaluation and public and agency comments on the Draft Brinnon Subarea Plan. On December 21, 2001, DCD distributed a DCD-recommended Brinnon Subarea Plan dated December 21, 2001. The DCD-recommended version includes specific attempts to incorporate comments from the Tribes, the Jefferson County Department of Public Works, OCD, and others into the Plan without disturbing the basic goals and policies as drafted by the Planning Group. The DCD-recommended version also reflects an internal and external consistency analysis by staff.
42. Members of the Brinnon Subarea Planning Group submitted comments to the Planning Commission on the December 21, 2001 version of the Subarea Plan. These and other comments were incorporated into a set of proposed amendments submitted by DCD to the Planning Commission for consideration at the January 16, 2002 Planning Commission meeting.
43. After timely and effective public notice, the Planning Commission held an open record public hearing in Port Hadlock on January 16, 2002 to accept public testimony regarding proposed Unified Development Code amendments to implement the provisions of the goals and policies of the Draft Brinnon Subarea Plan.
44. At their January 16, 2002 meeting, the Planning Commission voted five in favor and two opposed to recommend a Brinnon Subarea Plan and associated amendments to the Unified Development Code to the Jefferson County Board of Commissioners for consideration and adoption. The Planning Commission-recommended Brinnon Subarea Plan is dated January 16, 2002 and is a line-in/line-out version of the August 28, 2001 Draft Brinnon Subarea Plan. The suggested edits in the January 16, 2002 Planning Commission-recommended Brinnon Subarea Plan are a result of Planning Commission consideration of public testimony and comment, the December 21, 2001 DCD-recommended Subarea Plan and subsequent recommendations from DCD, and Planning Commission deliberation regarding the proposed Brinnon Subarea Plan.
45. The Brinnon Subarea Plan and associated Unified Development Code amendments referenced herein have been subject to environmental review in compliance with the State Environmental Policy Act (SEPA) (Chapter 43.21C RCW and Chapter 197-11 WAC). On December 12, 2001, the County's SEPA Responsible Official, Director of Community Development Al Scalf, issued a Determination of Non-Significance (DNS) and Notice of Adoption of Existing Environmental Documents for the legislative amendments referenced herein. The SEPA threshold determination

carried a two-week comment period followed by a two-week appeal period, per UDC Section 8.

46. In issuing the threshold determination, the SEPA Responsible Official determined that, with the exception of two components of the proposed Brinnon Subarea Plan, the range of alternatives presented in the Plan had been previously considered in an existing environmental documents, the Draft and Final Environmental Impact Statements prepared in conjunction with the Jefferson County *Comprehensive Plan* adopted in 1998. For the two components that were not previously been considered in a SEPA review process, namely the proposed 17-acre Light Industrial district and a portion of one parcel within the redrawn Brinnon RVC, the SEPA Responsible Official determined that the impact of taking this nonproject action, the adoption of a Subarea Plan, was not likely to have a significant adverse environmental impact, specifically due to the required application of all relevant UDC provisions and existing local, State, and Federal regulations on any future development proposals.
47. Prior to the deadline for submitting an appeal to the SEPA threshold determination, one timely appeal was submitted to the County. An open record public hearing before the Hearing Examiner contracted by Jefferson County has been scheduled for February 19, 2002.
48. Before issuing the threshold determination, DCD staff consulted with staff within the SEPA Program of the Washington State Department of Ecology (“Ecology”). Ms. Barbara J. Ritchie, SEPA Unit Supervisor, emailed DCD on September 6, 2001 with suggestions related to SEPA. One of the threshold determination possibilities discussed was the DNS and Adoption of an Existing Environmental Document using the form provided in Appendix D of the SEPA Handbook. The SEPA Responsible Official also communicated via telephone with Ms. Rebecca Inmann of Ecology in January of 2002 regarding the possibilities under the SEPA rules for the lead agency when considering comments submitted during the comment period for a SEPA threshold determination. Among the possibilities discussed were a public meeting and an addendum to a SEPA threshold determination.
49. On January 22, 2002, DCD held a public meeting in Brinnon to discuss the environmental review of the proposed Brinnon Subarea Plan. Approximately 20 persons were present, including representatives from the Washington Department of Fish and Wildlife and the Port Gamble S’Klallam Tribe.
50. On January 30, 2002, DCD published an addendum to the SEPA threshold determination of December 12, 2001, incorporating by reference certain documents, maps, and information, most of which was posted on a Brinnon Subarea Plan SEPA review website linked from the Brinnon Subarea Plan website maintained by Jefferson County. Other documents incorporated by reference are available for inspection or copying at cost at DCD.
51. The Planning Commission finds that the Brinnon Subarea Plan has been prepared in conformance with the goals and requirements of the GMA (Chapter 36.70A RCW) and is externally consistent and compatible with the 13 statewide planning goals contained within the GMA (§36.70A.020 RCW).

52. A subarea plan must be internally consistent and consistent (i.e., not incompatible) with the comprehensive plans for which the subarea plan is intended to be a component, per WAC 365-195-070, WAC 365-195-210, and WAC 365-195-500. The Brinnon Subarea Plan has been reviewed against the Jefferson County *Comprehensive Plan* and the County-Wide Planning Policy for Jefferson County and is found by the Planning Commission to be in conformance therewith.
53. Pursuant to UDC Section 9.8.1.b, the Planning Commission enters the following findings:
 - a. The growth management indicators (1-7) listed under UDC Section 9.5.4.b have been considered (including analysis in DCD staff memorandum dated July 12, 2001 in regard to the 2001 *Comprehensive Plan* amendment cycle) and it is assumed that the Board of Commissioners, by sanctioning the Brinnon subarea planning process and forwarding to the Planning Commission the Draft Brinnon Subarea Plan formulated by the Brinnon Subarea Planning Group, has determined that a subarea plan for the Planning Area #11 is a proper and desirable endeavor.
 - b. Similarly, the three items listed in UDC Section 9.8.1.b have been considered and the same assumptions entered regarding the intentions of the Board of Commissioners as legislators for Jefferson County.

The Planning Commission enters the following Findings regarding the content of the January 16, 2002 draft of the Brinnon Subarea Plan:

1. Through the adoption of the Brinnon Subarea Plan, the Board of Commissioners would signal its continuing intention to provide for economic development consistent with the rural nature of the Brinnon subarea, and to provide for an affordable and viable community while also seeking to preserve the unique natural and built environment of the subarea consistent with Policy LNP 1.4 and LNP 4.8 of the *Comprehensive Plan*.
2. The Land Use and Rural Element of the Brinnon Subarea Plan provides for the analysis and establishment of new and amended land use and overlay districts within the subarea. It is the intent of the Land Use and Rural Element and the Brinnon Subarea Plan in general to protect the existing uses permitted within the various land use districts, and to allow a maximum degree of latitude to promote residential harmony and preserve the rural character and environment of Jefferson County, while at the same time allowing profitable business and development to contribute to the economy of the community.
3. The Jefferson County *Comprehensive Plan* (as adopted in 1998) by its limitations on non-residential land uses and interim Limited Area of More Intensive Rural Development (“LAMIRD”) designations in the Brinnon subarea places sufficient constraint on new commercial/industrial economic activities so as to preclude significant new rural economic development opportunities. We find this inconsistent with the requirements of the GMA “*that traditional rural lifestyles including rural-*

based economies and opportunities are to be fostered” in the pattern of land use and development established by a county in its comprehensive plan per RCW 36.70A.030(14)(b) and RCW 36.70A.070(5).

4. The Brinnon Subarea Plan finds that the definition of the “built environment” for the purposes of designating a LAMIRD logical outer boundary consistent with the requirements of RCW 36.70A.070(5)(d) reflect the findings of the Western Washington Growth Management Hearings Board, as stated in Durland, et al. v. San Juan County, that the “built environment” as it applies to RCW 36.70A.070(5)(d) “means only those facilities which are ‘manmade,’ whether they are above or below ground.”
5. LNP 6.1.13 of the *Comprehensive Plan*, at page 3-74, states that if there is more favorable treatment in the *Comprehensive Plan* for the West End of the county, then that difference arises from a decision to “provide employment opportunities in a unique area that is isolated and distant from commercial and urban growth areas. This region is characterized by high unemployment, a distressed economy [and] low residential densities...” The Planning Commission finds that this policy constitutes a rational basis for treating certain uses in the West End, and other remote rural areas of the county that can demonstrate similar characteristics, differently from the same uses within the same zone in other areas of the county, and further provides a rational basis for the establishment of the Remote Rural Area overlay district, as set forth in the Land Use and Rural Element of the Brinnon Subarea Plan.
6. The Planning Commission finds that the Brinnon subarea is a unique area, relatively isolated and distant from commercial and urban growth areas—being between 38 and 45 miles from the closest urban growth area (“UGA”) in the county (Port Townsend).
7. The year 2000 US Decennial Census socioeconomic data for sub-county geographic areas have not been released in their entirety. Therefore the 1990 US Decennial Census contains the best available socioeconomic data relating to the assessment of local economic conditions for subareas in Jefferson County.
8. The 1990 US Census indicates that, in 1989, 13.5% of all residents in Jefferson County lived below poverty level. By comparison, approximately 22.5% of Brinnon area residents lived below poverty level.
9. The 1990 US Census indicates that, in 1989, approximately 7% of all persons in the Jefferson County labor force were unemployed. By comparison, approximately 12.5% of the Brinnon area labor force residents were unemployed.
10. The Economic Development Element of the Brinnon Subarea Plan indicates that according to the 1990 US Census, Brinnon experienced a local labor force participation rate one-half that of Jefferson County and a workforce disability rate four times as high as the county as a whole.
11. The 1990 US Census indicates that, in 1989, local, State, and Federal government workers accounted for approximately 38% of all employed persons in Jefferson County. By comparison, 50% of all employed persons in the Brinnon area were government workers.

12. The 1990 US Census indicates that, in 1989, approximately 14% of all employed persons in Jefferson County were self-employed. By comparison, in the Brinnon area, approximately 18.5% of all employed persons were self-employed.
13. The Remote Rural Area overlay district, as set forth in the Land Use and Rural Element of the Brinnon Subarea Plan and in the proposed UDC Section 3.6.12 establishes the same home business and cottage industry requirements for Brinnon as the West End.
14. The Brinnon Subarea Plan demonstrates in the Land Use and Rural Element and the Economic Development Element that a significant portion of the local economy in Brinnon is based on tourism, home business and cottage industry.
15. The Brinnon Subarea Plan indicates that the large lot and remote settlement pattern, minimum Rural Residential (“RR”) one dwelling per five acres (“1:5”), RR 1:10, and RR 1:20 zoning, and presence of significant home business and cottage industry activities in Brinnon has not led to significant conflicts with surrounding or adjacent residential uses. On the contrary, the Planning Commission finds the pattern of residential development and non-residential uses contained within or as a component of home-based businesses or cottage industries in Brinnon to be mutually compatible.
16. The Economic Development Element indicates that increased tourism is a prime objective of the Brinnon Subarea Plan and that the community is particularly well suited to accommodate increased recreational-based and amenity-driven tourism activities.
17. The Land Use and Rural Element of the Brinnon Subarea Plan and UDC Section 3.6.14 adopt a Small-scale Recreation and Tourist (SRT) overlay district for a portion of the WaWa Point area to foster appropriately scaled recreation and tourism development.
18. The Land Use and Rural Element of the Brinnon Subarea Plan incorporates recommended provisions addressing the potential future designation of a new Master Planned Resort (MPR) for the Black Point/Pleasant Harbor area based on the historic use of the area for resort and recreational purposes.
19. The Land Use and Rural Element of the Brinnon Subarea Plan adopts a revisited boundary for the Brinnon Rural Village Center (RVC) sufficient to meet the logical outer boundary and built environment requirements for LAMIRD designation consistent with the requirements of RCW 36.70A.070(5)(d).

Based upon public testimony and based upon formal deliberation, the Planning Commission submits these recommendations for consideration before the Board of County Commissioners.

Thomas McNerney, Chair

Cheryl Halvorson, Secretary