

**Minority Report  
To  
Board of County Commissioners**

**February 6, 2002**

**Re:** Brinnon Sub Area Plan

**File Number:** Submitted

**Planning  
Commissioners:** Todd McGuire and David Whipple

**Background and Rationale:**

The minority recommends that the BOCC reject the Planning Commission majority recommendation to approve the Brinnon Sub Area Plan as proposed at this time. While both of the minority members understand the importance of adopting a plan with which to complete the Comprehensive Plan process as mandated by state law, we do not feel that the plan as written is adequate to address the many needs and voices raised by the local Brinnon community and stakeholders throughout the County.

Neither the Brinnon Sub Area Planning Group, County staff and consultant nor the Planning Commission addressed a variety of issues which had been brought forward during development of and comment on the plan. The minority opinion is that both the process and current Plan document are flawed to the point of being unacceptable for adoption and implementation. As a result, the taxpayers are again faced with paying for more agency defense of legal challenges brought by individuals and groups who were negligently disregarded during the plan work. The costs and delays for addressing these inevitabilities should be compared with the options of extending the SAP process with a more complete group of stakeholders and a fast track, goal oriented schedule.

Office of Community Development (state OCD), County staff and members of the public who testified noted that a number of the Plan provisions, including the exemptions for home businesses and cottage industries, the logical outer boundary analysis of the Brinnon RVC and the SRT overlay may not fit with GMA and /or Comprehensive Plan criteria. Thus, adoption and subsequent challenge expose us all to more delay and cost to achieve a document truly representative of the community.

The sub area planning process presents a rare opportunity to address “big picture” issues and cumulative effects related to capital and public facilities planning, as well as ecosystem impacts and mitigation techniques. It is not possible to adequately address such concerns on a project specific basis. Included in this opportunity are efficiencies and economies of regional and inter-community actions, as well as identification of funding and resource availability. The adamant exclusion of interested stakeholders and narrow focus by the SAP group has resulted in a wasting of that opportunity. This is not an excuse for forcing adoption of a plan bearing all the shortcomings of that being considered.

There are specific topics that should have been addressed in the plan and questions which should be answered prior to adoption of any suitable SAP. These include the following:

1. Black Point MPR recommendation: In addition to a review of the reasons for a project specific recommendation being included in a community plan, the impacts of the likely increase in property values, and resultant effects on housing costs, associated with the recommended designation of Black Point as a Master Planned Resort should be identified and acknowledged. Although members of the BSAP group maintain that they were not addressing specific projects, this is clearly a project specific recommendation with many impacts not embraced by the community. Officers and investors in the Black Point LLC, which owns the property, should be identified and included in the record for the benefit of community stakeholders. Representatives of the LLC should be invited to participate in the stakeholder's group to discuss ways in which such a development could occur while addressing concerns expressed by neighbors. How will affordability of housing for year round, low-income Brinnon residents be addressed relative to the establishment of such a resort? There is no available definition of built environment that would justify extending this commercial area to the West Side of 101. How will this burden be met?
2. Commercial acreage expansion: This should be referenced to previous work done on Glen Cove / Tri Area and Trottier analysis for needed capacity without undue infrastructure burden to taxpayers to support GMA required growth predictions per OFM data (updated for the 2000 census). There has also been concern expressed by Brinnon business owners that expansion of the zones will lead to a devaluation of their commercial properties. How will County wide commercial acreage determinations be integrated with the proposed expansion of Brinnon commercial acreage figures and justified with growth management indicators?
3. Environmental implications for proposed development: There has been a persistent lack of emphasis on the value and fragility of the area ecosystems throughout the plan, as noted by numerous individuals and agencies concerned with protecting same. There has also been an exclusion of input and involvement by the SAP group of many of the entities most able to assess and advise on these areas of great importance. How will the cumulative effects and impact of proposed commercial shorefront and flood plain development be addressed relative to ecosystem concerns?
4. Economic development options: A number of other options besides the part time resort employment and home business model were presented for consideration by the SAP group. Why were not other forms of economic development pursued or described in the Plan document? Additional public/private activities were mentioned as possible and should have at least been mentioned as future options.
5. Capital and public facilities impacts: While the specific elements of the Plan have been addressed by Public Works, there are a number of significant improvements implied in the rezones which would have dramatic effect on taxpayers throughout the County if implemented. These include needed infrastructure for SRT development at WaWa point, as well as water and sewer requirements with the planned increase in demand due to zoning changes. The current document does not adequately describe the social, educational, recreational, or community resources available to the local residents or describe what their future needs may be. It certainly does not plan for those needs. On occasion, it mentions items like an assisted living center, but there is no discussion on how to meet a market demand, provide infrastructure, where these activities would be sited, etc.

6. Remote Rural Area and associated exemptions for home businesses and cottage industries: Criteria determination and justification for designation of Brinnon as a Remote Rural Area and associated planning exemptions for cottage industries and home based businesses must be developed and demonstrated. These will have significant quality of life implications for Brinnon residents. This will also require amendment of the Unified Development Code and likely the County Comprehensive Plan, meaning that there are County wide implications for the Plan. What will reasonable limits on the expansion of cottage and home industries be (regarding employees, activities, etc)? When complaints arise, will the county provide any resources or assistance to both parties and is there a dispute resolution mechanism in place? The justification for this designation was obviously intended to be misleading. The argument that Port Townsend and Forks have equal services because they are both UGA's is absurd. This becomes even more disingenuous when one realizes that the county is concurrently working toward establishing a second Jefferson Co. UGA in Port Hadlock (23 miles from Brinnon). There are also three other UGA's, 2 commercial centers, a historic village, and an MPR closer to Brinnon than the West End is to Forks. Brinnon residents have options on medical services, schools, shopping, transportation, and recreational activities not available to those living on the West End. It is ludicrous to compare Brinnon to the West End in terms of equal remoteness.
  
7. Commercial designations: The term "built environment" is used quite differently here than it is throughout the Comprehensive Plan. The Durland case may allow for more expansive uses, but the County needs to amend its own CP first in a manner consistent with GMA and relevant case law. As defined in the SAP, an old fence post, residential septic system or tree stand would constitute built environment. This is clearly not the case when reviewing the term built environment in the CP. The county chose not to amend this at this time. They were aware of this issue and merely chose to amend the MPR question during this amendment cycle. This is an area that is clearly inconsistent with the central tenets of the CP and clear grounds for an appeal. This discussion affects the proposed WaWa Pt area, the Brinnon RVC area, and the proposed MPR area.
  
8. Changing demographics: The SAP document does not make its own case statistically. It does not use readily available documentation from DSHS, ESD, local school systems, and/or OFM to describe the community and changes that have occurred since 1997. The SAP members response was that they were unable and unwilling to include data that did not further their desire to expand commercial opportunities. This was a glaring oversight that should have been easily corrected.

The failures of both process and Plan noted above have been documented in a number of ways and forms. Unfortunately, there is not a document which centralizes this information. Although lengthy, we feel it important to organize and present the information which has been ignored in the development of the plan to identify possible areas for improvement. In particular, we reference the following:

1. Public testimony (Planning Commission meeting minutes) from Brinnon community residents and interest groups held on July 31 and October 17, 2001. In particular testimony from :
  - a. *Lynnette Antijunti, Brinnon*, stated that she proposed a recommendation different from that proposed in the draft plan for WaWa Point. She provided that proposal in writing.

- b. *Marilyn Pedersen, Brinnon*, She worried about huge business in Brinnon. She worried about infrastructure costs. She asked what would happen to the community if Brinnon had to have a huge sewer for a condominium development. Ms. Pedersen stated that she grew up in a wealthy town and saw the classic "looking down on the little people". She stated that she was one of the "little people" now and did not want to live in that atmosphere. She asked people to think hard about the changes. She supported small businesses and jobs, and strongly supported the school. She wanted people to think about infrastructure costs, especially associated with development at Black Point.
- c. *Mark Rose, Brinnon*, stated that he had attended every meeting of the sub-area planning group since February, except one. He noted that he had drafted some parts of it. Mr. Rose stated that he was very disappointed in the final draft. He stated that one area he was disappointed in was that the plan did not seriously address economic development. There was nothing about how jobs would be tracked, how jobs would be attracted or what kinds of jobs would try to be attracted, or what kinds of businesses the community would try to attract. Mr. Rose stated that economic development was really addressed in land use. Mr. Rose stated that the plan expected people to believe that if 383 acres were re-zoned to mixed use, jobs would be created. However, it did not address what kind of jobs would be created or what the impact would be on infrastructure, water or fire. Mr. Rose stated that the plan did not address the impact on the environment, the water or the shoreline. The plan addressed single family homes on the waterfront. He asked what that impact would be. Mr. Rose stated that environmental groups did not have input into the plan. He stated that other groups who could address economic development, capital facilities, or environmental impacts had no input either. Mr. Rose stated that the draft plan was very strong on re-zoning but very weak on the impacts of that re-zoning. Mr. Rose stated that he would like to see those issues addressed in the plan.
- d. *Loni Beringer, Brinnon*: She stated that when she became aware of the grandiose vision for Black Point, she questioned whether the majority of the amenities were not geared towards a certain class of people, that being the wealthy. She questioned whether the majority of people who made Brinnon their home would be able to afford to stay. She questioned how many Brinnon families would actually be employed in the development on a full time basis throughout the year.
- e. *Olivia Alfano, Brinnon*: She stated that, according to the Brinnon plan, 57% of the community's population was low to moderate income. She stated that along with the stress of low income and poverty frequently ensued the complications of dislocation and alcohol and drug abuse. Ms. Alfano stated that the cure for those ills would not come from an upscale resort catering to the affluent. She thought the disparity between the "have's" and the "have not's" would become more pronounced. Ms. Alfano stated that while the developers of the vision would gain windfall profits, the workers could expect little more than minimum wage and seasonal employment.
- f. *Walt Parks, Brinnon*: He stated that issues he had not seen addressed were references to low income housing or affordable housing in the plan. He thought that what he saw in the plan led him to believe that the traditional, historic home

owners of Brinnon would be priced out of the market. As a home owner, Mr. Parks was very concerned about exempting homes and businesses from CC&Rs and conditions which avoided conflict in a community, such as noise abatement, hours of operation, etc. He was strongly against excluding the Brinnon community from those normal residential rules.

- g. *Ken Shock, Brinnon*: He stated that health, environment, and water are all threatened by golf courses such as that proposed for Black Point. He expressed particular concern for pesticide leaching into Hood Canal and encouraging salt water intrusion by drilling irrigation wells to keep the golf course green during dry Brinnon summers.
- h. *Barbara Gauer, Brinnon*: She thought the three separate commercial zones could be the beginning of urban sprawl.
- i. *Kirie Pedersen, Brinnon*: She stated that a lot of the justification of the plan was based on a high poverty claim. She stated that resorts and the proposed commercial development did not help the poor; it drove the poor out. If enacted, the plan would raise the taxes for the rest of the residents. She stated that the plan was simply an effort to re-zone a rural area under the pretenses of helping poor people and young people. She stated that the only people it would help were the ones who owned the investment property; it would not help the elderly, or disabled, or the poor, or the young. She stated that San Juan County had the second greatest difference between the rich and the poor in the state since four resorts were developed there. She stated that the original residents had been driven out because they could not afford to live in their own town.
- j. *Wayne King, PUD commissioner for the Brinnon area*: He reported that the PUD would be the lead agency on seawater intrusion. He stated that the quality of water in Brinnon was not that good. Referring to the proposed golf course, Mr. King stated that his own opinion (not the PUD's opinion) was that a golf course would take one million gallons of water per day in the summer. He wondered whether there was that much water available. Mr. King stated that in researching the water rights permits for the area, he did not see that kind of volume.

*From October 17 meeting:*

- k. *Jean Johnson, Brinnon*: She stated that she did not believe the citizens of Brinnon had been told the truth. She stated that comments had been ignored and/or judged irrelevant. Ms. Johnson questioned how any development could occur without a water and sewer system. Ms. Johnson stated that most of the employment would be minimum wage. She believed that there must be an agreement, not a consensus. Ms. Johnson stated that the citizens of Brinnon had a right to be told the future cost to them of the proposed development.
- l. *Loni Beringer, Brinnon*, Ms. Beringer stated that she attended the planning group meetings for about a year and a half. They allowed ten minutes at the beginning and end of each meeting for public comments. She did not think that was enough time to hear peoples' issues and concerns and to address their questions. Ms. Beringer felt sure many of the people in attendance had received an e-mail

concerning this meeting regarding support for the plan proposal. Concerning the e-mail, Ms. Beringer stated that it was sad, ludicrous, and even scary.

- m. Peter Siefert, Brinnon:* Mr. Siefert thought the potential to damage the rural lifestyle and fragile environment were much greater than the positives. He stated that the plan's unique SRT zoning would initiate sprawl and jeopardize the natural resources by directing such development to WaWa Point. Mr. Siefert stated that the UDC already provided for small scale recreation and tourist development in rural residential areas like WaWa Point via the conditional use permit process and that the SRT overlay would remove the UDC provisions intended to include local resident input, maintain rural character, and prevent sprawl. The proposal would allow the existing recreational uses and facilities to expand without public input currently required by the conditional use permit provisions. He pointed out that it exempted some recreational uses with minimum lot size requirements. He stated that the SRT overlay area contained several streams which fed into Jackson Cove and supported salmon spawning. Those waters were also important to salmon recovery and Brinnon's aquaculture. Mr. Siefert stated that the SRT overlay was trying to justify development in areas where further development would be destructive to Brinnon's valuable natural resources. Mr. Siefert stated that the county would be doing the residents of Brinnon a disservice by approving the MPR zoning. It would jeopardize Brinnon's most valuable economic assets, which were healthy marine waters and shorelines. He was convinced that the county did not have adequate resources to insure the protection of our natural resources threatened by such land disturbing activities. Mr. Siefert stated that many people in Brinnon thought the permits and processes, both state and county, would protect that area from any detrimental projects undertaken by the development of a MPR. He did not believe that. Mr. Siefert stated that the county must adopt a new Shoreline Master Program but it did not have the financial means to follow through. He was very concerned about the detrimental effects of a MPR on the shorelines, water quality, shellfish, and salmon, as well as to Brinnon's character. He urged the Planning Commission to take a common sense look at this plan and to have the courage to say it was just too risky. Mr. Siefert asked that the county not leave the community of Brinnon responsible for cleaning up the mess after developers were gone.
- n. Linda Tudor, Brinnon:* She was asked if she, as chair of the SAP group, could provide the Planning Commission with any information about other groups that had participated in the planning effort such as tribes, state agencies, or non-profits. Linda Tudor replied that groups had the opportunity to comment based upon the advertising that was done. Ms. Tudor stated that the planning group did receive some comments. Planning Commissioner Whipple asked if Ms. Tudor could provide information on those that did participate in the process. Ms. Tudor indicated that she would.(not provided to date).
- o. Mark Rose, Brinnon,* submitted 312 pages of documentation on behalf of the Better Brinnon Coalition. He spoke about the CDBG grant that was received from the state for the Brinnon planning effort. Mr. Rose stated that the purpose of the planning grant was to help mostly low and moderate income individuals. He stated that a lot of stipulations came with the grant. The first was that a grievance procedure was to be instituted from the beginning of the process which

would allow anyone to submit a grievance to the DCD and get a written response within 15 days, with an appeal process to the BOCC or a grievance committee. Mr. Rose stated that was not done. Mr. Rose stated that grievances submitted to either the planning group, the BOCC, or by proxy the Planning Commission were dismissed and sometimes derided. Mr. Rose stated that was one of the main violations of the grant. Mr. Rose stated that the grant said that the Hood Canal region had received an Endangered Species Act listing. He stated that a component of the draft plan would be to develop critical areas and shorelines. Mr. Rose stated that one of the requirements of the grant was to develop policies to develop regulations to comply with that listing. Mr. Rose stated that was not done. Mr. Rose stated that the grant also said that several state and federal agencies were to have been consulted in the drafting of the plan. That was not done. Mr. Rose contended that, in fact, when the tribes tried to become involved in the planning process, they were told that they could not. Mr. Rose stated that the public was not given copies of the plan nor were documents provided at meetings. Mr. Rose stated that he had real concerns about the public process, saying that he did not think the public was involved in the development of the plan and was, in fact, shut out. Mr. Rose stated the belief that the draft plan was not in compliance with the GMA or the Comp Plan. He thought it was seriously out of compliance. Mr. Rose stated that he had heard two Planning Commissioners say that the plan did not have to be in compliance. Mr. Rose stated that he differed with that opinion as well.

- p. *Olivia Alfano, Brinnon*: She addressed the SRT at WaWa Point, pointing out the uses that could be allowed. Ms. Alfano stated that conditional use permits and minimum lot sizes would be waived. Ms. Alfano stated that the plan indicated that additional infrastructure would not be necessary. Ms. Alfano stated that considering the many possibilities for development, that seemed unreasonable without enhancing lighting, roads, water and sewage facilities. She questioned what impact public comments would have at the time of development if the SRT was enacted. Any commercial tourist related development would be dormant for much of the year. Ms. Alfano stated that she would prefer to see, rather than open-ended zone changes which emphasized commercial tourist development, proposals which would insure the preservation of the natural beauty and which would encompass the economic, social and cultural ambitions of the community. An example might be a Hood Canal maritime center, including the history of the people who settled in the area and the fish, animal and natural ecosystems of the area.
- q. *Diane Derrick, Brinnon*: She stated that the vision for WaWa Point was an idyllic one and not a reality. She stated that with the current residential zoning, only three residences could be built. The plan on the other hand envisioned thirty cabins, attendant commercial facilities, restaurants, etc. She stated that such development would not be consistent with the existing rural residential character and that the plan billed the SRT overlay as a unique gateway to WaWa Point, Pulali Point, and Point Whitney. She stated that WaWa and Pulali had no facilities and no accessible public features, and she asserted that the development should benefit the people of the immediate area and greater Brinnon. She said the development should be of a permanent, full time, non-seasonal nature. Ms. Derrick stated that, according to the UDC, an SRT designation specifically stated that the commercial facilities were derived from recreational and tourist use and

not from the existing or projected rural population. She questioned how that jibed with the planning group's assertion of compatibility and consistency with the rural character. Ms. Derrick stated that tourism and a rural population were notoriously incompatible and that the plan might benefit a few small business owners for a few months of the year but would not provide jobs or services for the local population. Ms. Derrick stated that the plan proposed to exempt the SRT overlay from most SRT codes, including minimum lot size, expansion of existing facilities, etc. Ms. Derrick stated that it would result in inappropriate sprawl. Ms. Derrick stated that, with the country and this county sliding deeper into recession, it seemed foolhardy to designate an area for development at this time based solely on the visitudes of tourism, the industry most vulnerable to suffer as the economy worsened. Ms. Derrick stated that the research and planning necessary for the development of WaWa Point simply had not been undertaken.

- r. *Ted Labbe, Port Gamble S'Klallam Tribe habitat biologist*, Mr. Labbe stated that habitat loss and degradation stemming from poor development standards and destructive land use practices had resulted in closure of shellfish harvest areas and salmon population decline, thereby jeopardizing the tribe's treaty rights to fish. Mr. Labbe stated that the tribe was concerned that new development permitted under the subarea plan would further erode the fish, shellfish, and wildlife population and undermine their treaty rights. Mr. Labbe stated that the tribe offered initial comments in August, stating that they had only a brief time in which to comment. He stated that he had more extensive comments to submit to the record at this meeting (see reference below). Mr. Labbe stated that while the tribe raised a number of inconsistencies and issues of concern in August, the tribe never heard back from the planning group or the county about how those concerns would be addressed. As a result, Mr. Labbe stated that they were resubmitting those concerns for the record along with more detailed information. Mr. Labbe stated that a number of specific issues emerged that were important to the tribe during the review of the draft plan. One was the lack of consideration for impacts to regionally significant fish and wildlife populations. There was no discussion about how the planning group proposed to balance economic growth with the protection of the area's significant fish and wildlife population. That shortfall was particularly notable in relation to the ESA listed salmon species as well as other state protected species. He stated that nowhere was the deficiency more notable than the plan's recommendation for the development of a MPR at Black Point. Mr. Labbe stated that Black Point and the Duckabush estuary held numerous species that would be attacked by large scale development. Mr. Labbe stated that the Brinnon planning group did not consult with the state's information sources nor consider how the MPR development at Black Point would attack those natural resources. Mr. Labbe stated that the tribe requested that the Brinnon planning group and/or the county make a formal request for that information from WDofF&WL, put that information into the record of these proceedings, and consider how development at Black Point and WaWa Point would be ameliorated to protect the area's important fish and wildlife populations. Mr. Labbe noted that there were some fairly significant inaccuracies with the history of the tribe in the area. He had never heard from the planning group if they were corrected. Mr. Labbe stated that a major concern of the tribe was the extent and intensity of new land use. Mr. Labbe stated that the designation of Black Point as a MPR was inconsistent with both the spirit and

intent of the GMA and the Comp Plan. It was not clear how that would limit and not expand further development. Mr. Labbe stated that other inconsistencies included a terrible misunderstanding of the shellfish harvest issue and flooding and floodplain development issues. Those were issues the tribe would like to see corrected. Mr. Labbe stated that the tribe was very interested in a reply back from the county or the planning group about how the issues they raised were addressed.

- s. *George Sickel, Brinnon (member of SAP group)*: He stated that he had taken it upon himself to send out a mailer to all Brinnon residents. Mr. Sickel explained his reasons for doing so. He wanted to give each property owner the opportunity to let the Planning Commission know whether they were for, against, or did not care about the plan. (see Eleanor Sather letter below)
- t. *Kate Marsh, Brinnon(member of SAP group)*: Concerning state agency or tribal consultations, Ms. Marsh explained that the planning group would have asked for such consultations if it felt it needed that kind of advice. Ms. Marsh stated that the idea of the planning group initiating such contacts was out of keeping with the design of the subarea plan, which was addressing the commercial areas in Brinnon. Ms. Marsh stated that the planning group was not in the business of making proposals for certain kinds of businesses. Planning Commissioner Michelle Sandoval asked if the planning group had seen the grant at the start of the group process. Kate Marsh replied that they had. Ms. Sandoval asked if the group had been aware of the list of agencies that were mentioned for consultation. Ms. Marsh stated that, while she did not mean to be critical, when she saw the grant as written, she edited out the paragraph that contained the list of agencies. Ms. Sandoval asked if the group had read the grant and were aware of the consultation requirements. Ms. Marsh replied that she could only say that many of the group members had read the grant. Planning Commissioner David Whipple asked for clarification of her statement that the purpose of the plan was to examine the commercial designations. Ms. Marsh clarified that the commercial designations were the focus the group started with.

2. Letters from Jefferson County residents and interested parties:

- a. *Eleanor Sather, Brinnon, former member of SAP group, Owner of Whitney Gardens and Nursery, LLC*:
  - October 17, 2001: Describes her dismay with receipt of anonymous mailer (see George Sickel above), as well as the composition, conduct and intent of the SAP group.
  - January 1, 2002: Questions assumption that existing tightline impedes economic development, disagrees with SAP's use of building permits to define economic development, concern about lack of address of low income housing, potential devaluation of her commercial property with expanded commercial zone and repeated disdain for composition and conduct of sub area group.
- b. *Jean Johnson, Brinnon, former SAP group member, Owner of Brinnon General Store*:
  - December 26, 2001: Describes her dismay with SAP group composition and conduct and recommendation to disregard current document.

- c. *Ted Labbe, Jamestown S’Klallam Tribe Habitat Biologist:*  
October 17, 2001: 4 pages detailing concerns and suggestions for plan improvements noted in testimony above.
- d. *Marty Ereth, Skokomish Natural Resources, Fish Habitat Biologist:*  
October 15, 2001: 6 pages detailing specific areas of concern in the plan with suggested changes. “The majority of our comments will focus on environmental attributes of the Brinnon area and eco-systems that may be threatened by items proposed in the plan rather than the economic conditions, growth and job opportunities available.”

3. Letters from State agencies:

- a. Dept. of Fish and Wildlife (Jeff Davis, Area Habitat Biologist):  
December 24, 2001: 4 page letter detailing concern with lack of agency involvement; need for proper zoning relative to flood plain development; need for determining Black Point MPR impacts to property values and affordable housing, sprawl, wildlife diversity, stormwater and groundwater; appropriate locations for growth; inadequacy of review and comment periods.
- b. Office of Community Development January 16, 2002 (Ted Gage):  
Confirms inappropriateness of RRA designation for the Brinnon area and exemptions for home businesses, as well as needed revisions to proposed RVC densities.

**Findings of Fact:**

1. The process for identifying subarea planning group members and associated stakeholders representing all the interests and requirements of the community and involving the Planning Commission during group selection and process development was very inadequate.
2. The terms of the grant application for considering affordable housing as a top planning priority were not addressed. Likewise, the goal of the SAP being in compliance with the Comprehensive Plan was ignored. Through much of the process, it was considered to be a stand-alone document that did not need to comply with the CP.
3. The consultant retained by the County to assist in the Plan development was directed by the SAP group to focus strictly on creating defense for the proposed rezones and new zoning categories created during the process. This was a waste of resource which also benefitted specific parties, some of whom were on the SAP group, and a missed opportunity for applying grant resources for the benefit of the greater community.
4. The suggestions and requests made by other members of the Brinnon community, as well as the concerns that were raised during the community meetings before the Planning Commission, were not adopted or addressed in the current Plan document.

5. The subarea planning group chairperson has not provided the list of state agencies she claims were contacted during the planning process and which she committed to providing.
6. The subarea planning group included members who had direct conflicts of interest relative to personal commercial property and subsequent zoning recommendations.
7. The property proposed for addition to the interim commercial zoning adds about thirty-six (36) acres to the Rural Village Center (RVC) and about seventeen (17) acres of industrial zoning. With the addition of the Black Point MPR (approximately 300 acres) recommended by the BSAPG, the total proposed non-residential designation totals approximately 353, more than recommended for the whole county over the 20 year planning window. This violates the intent and purpose of the GMA. There is no statistical justification provided in the document for this expansion. As per Comprehensive Plan and UDC, a justification needs to be provided.
8. Current health and human services data provided by Planning Commission member for reference and inclusion in the Plan was not addressed. The county staff and planning group declined to look at any data that did not conclude that there was an immediate need for the four economic development projects cited.
9. The *Jefferson County Community Planning Guidelines and Comprehensive Plan Revision Process*, or “Blue Book”, (latest revision June 1994) is inadequate to address the SAP process and more clearly define requirements related to group selection and composition, involvement of the Planning Commission during plan development, role of staff and consultants, methods for insuring Comp Plan consistency and legal compliance with state law.
10. The conduct of some members of the SAP group and Planning Commission was such as to polarize the process and demonize community residents, interested agencies and planning commission members who raised issues of concern. This was apparently with an intent to intimidate those with other views and insure passage of the SAP now being considered. It is inexcusable that neither the chair of the SAP group nor the chair of the Planning Commission addressed such language and behavior, implicitly condoning the behavior and goals. This led to a loss of confidence by the community, an alienation of those who could have benefited the plan and an inferior final product.

**Recommendation:**

It is the opinion of the minority that the citizens of Jefferson County would be best served by the BOCC if it were to reject this version of a Brannon Sub Area Plan and direct staff to develop a document (with representative stakeholder input) that would more adequately address the community’s needs in a holistic fashion that is consistent with the GMA and the Comprehensive Plan as written. In order to adequately address the interests of both the citizens and the ecosystems of Jefferson County, we respectfully request that the BOCC reject the current version of the Brannon Sub Area Plan.

The subarea planning process provides a unique opportunity to address long term needs, costs and benefits from a programmatic level. Planning “bookends” can be determined by assessing full build-out and maximum capacity values for proposed developments according to rezone or new

zone proposals. These can be used to address environmental, capital facility and population effects on a larger scale. This should be encouraged and accompanied by an examination and discussion of appropriate growth management indicators, as well as demographic and environmental data and trends. This document should be useable for community development, capital facilities planning, grant writing, and many other activities.

Furthermore, we recommend that the BOCC direct staff to:

1. Develop or revise the official SAP process to emphasize a more inclusive stakeholder identification and selection process and clearly identify and mitigate commercial conflicts of interests of planning group members. This is increasingly important as this plan is finalized and additional SAP's are pursued throughout the rest of the County. This should include community, staff (and consultant), tribe, agency, Planning Commission and BOCC roles and responsibilities and input at the group selection, mission statement, general goals, and element construction stages as well as the final draft stage. Results should be formalized in a revision to the Blue Book and appropriate Comprehensive Plan sections pertaining to Sub Area Planning.
2. Include, at minimum, the pertinent GMA growth management indicators as statistical evidence of change (over a period of no less than 10 years) for land use re-designation. This should be coordinated with a projection for total needed capacity of commercial and industrial land throughout the County and reflect the most current data available.
3. Inform community members that this is to be a staff led and directed exercise, they are to provide expertise, input, and contributions, but guidance and direction will be provided by the professional planners to insure compliance with revised Blue Book procedures. Adequate resource should then be allocated to produce a quality Plan.
4. In future SAP activities, to identify possible areas of inconsistency with the Comprehensive Plan as they are occurring so that the changes can be made in one effort rather than piecemeal. This will allow for a cumulative judging of the impact.

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David Whipple

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Todd McGuire