

EXHIBIT C:
**An Explanation of How the Proposal Conforms to the
Requirements of Suggested Plan/UDC Amendment
Submittal Requirement #6(a)-(c)**

6. Please prepare and label as "Exhibit C," a thorough explanation of how the proposed amendment, meets, conflicts with, or relates to the following inquiries (NOTE: Simple "yes" or "no" responses are unacceptable.)
- a. Have the circumstances related to the proposed amendment and/or the area in which it is located substantially changed since the adoption of the Jefferson County Comprehensive Plan?

Yes, the circumstances relating to the proposed Plan and UCD amendments and the area they would affect have changed substantially since the initial adoption of the Comprehensive Plan on August 28, 1998. Both the Port and County have, during the intervening years, explored a variety of different regulatory avenues for maintaining the long-term viability of the JCIA/EPF. These have included in various proposed "notice to title" provisions, various underlying as well as overlay zoning districts and development standards.

On December 22, 2003, the Port Commissioners adopted a new Airport Master Plan (AMP) consistent with FAA Regulations. The AMP, which is slated for final FAA approval in March of 2004, includes stringent measures to protect the public health and safety in the vicinity of the JCIA. The adoption of the AMP, along with the progression of County and Port discussions regarding the most efficacious means to implement the requirements of RCWs 36.70A.510 and 36.70.547 (which require the adoption of regulations to discourage the siting of new incompatible uses in proximity to general aviation airports), have necessitated the proposed amendments to the Plan narrative, goals, policies and implementation action items. Nevertheless, the proposed amendments are fully consistent with the original spirit and intent of the 1998 Plan provisions.

Importantly, the AMP establishes "noise contours" based on airport operations through the year 2022. This data is far more accurate and reliable than the information available at the time of Plan adoption in 1998, and is a rational and indispensable basis for establishing the "overlay zone" directed by the 1998 Plan language.

b. Are the assumptions that form the basis for the Jefferson County Comprehensive Plan no longer valid, or has new information become available that was not considered during the process of adoption of the Jefferson County Comprehensive Plan or any subsequent amendment?

New information has become available that was not considered during the development and adoption of the 1998 Comprehensive Plan (please refer to the response to subsection "a," supra). With the adoption of the AMP by the Port Commissioners on December 23, 2003, there is a wealth of new information available that should be drawn upon to ensure the following:

- That the Plan and UDC language accurately reflect the planning context at the JCIA;
- That the potential effects of activities on surrounding properties on the continued viability of the JCIA are appropriately factored; and
- That the projected future effects of continued, routine airport operations (carried out consistent with FAA regulations) are disclosed to the public.

It is necessary and appropriate that the Plan and UDC reflect this new information.

c. Does the proposed amendment reflect current widely held values of the residents of Jefferson County?

Yes. To the extent that the original Plan language was reflective of widely held community values of residents, so too are these proposed amendments. The proposed amendments update and clarify narrative, goal, policy and implementation language found within the 1998 Comprehensive Plan, and include UDC language that is consistent with, and implements, the proposed Plan amendments. Moreover, the proposed amendments are necessary to assure compliance with State law (see RCW 36.70A.510 and 36.70.547).

It should be noted that the Plan and UDC amendments proposed within this submittal have been developed in direct response to public, Planning Commission, and staff comments received on the original slate of amendments proposed by the Port in April of 2003. In response to these comments, the proposal has been significantly retailored to address public concerns and reduce the regulatory reach of the proposal, while still protecting the continued viability of the JCIA for the general public benefit of the citizens of Jefferson County. As such, the proposal is necessary in order to accurately reflect the widely held values of the residents of this County.