BEFORE THE WESTERN WASHINGTON GROWTH MANAGEMENT HEARINGS BOARD

IRONDALE COMMUNITY ACTION NEIGHBORS, Petitioner, v. JEFFERSON COUNTY, Respondent.	No. 03-2-0010 **FINAL DECISION AND ORDER**

I. SUMMARY OF DECISION

We applaud Jefferson County for its many years of hard work regarding how best to manage growth in the long-established, quasi-urban Tri-Area. We acknowledge that for a small county like Jefferson, the countless dollars, hours and immense energy put into this situation have been a major burden to the County. We find that, under the special circumstances the County faces in this case, it is appropriate to establish a non-municipal Urban Growth Area (UGA) in the Hadlock/Irondale portion of the Tri-Area. However, we are unable to find compliance of the designation of the Tri-Area UGA until the county completes its work of adopting urban level of service standards, finishing required capital facilities planning (especially for sewer), and fiscal analysis of affordability of those facilities, and develops and adopts development regulations for application within the UGA.

II. PROCEDURAL HISTORY

On February 24, 2003, Irondale Community Action Neighbors (ICAN, Petitioners) filed a Petition for Review (PFR) challenging the designation and provisions relating to the Tri-Area UGA and the Limited Areas of More Intensive Rural Development (LAMIRD) just outside of the UGA. Petitioners have subsequently abandoned issues relating to those LAMIRDs.

We held a telephonic prehearing conference on March 19, 2003. We held the Hearing on the Merits June 17, 2003, at the Port Townsend Council Chambers. Gerald Steel represented Petitioners; Mark Johnsen and Randy Kline represented Jefferson County.

III. PRESUMPTION OF VALIDITY, BURDEN OF PROOF AND STANDARD OF REVIEW

Pursuant to RCW 36.70A.320(1), Ordinances 18-1213-02, 19-1213-02 and 21-1220-02 are presumed valid upon adoption. The burden is on Petitioners to demonstrate that the actions taken by Jefferson County (County) are not in compliance with the requirements of the Growth Management Act (GMA, Act). RCW 36.70A.320(2).

Pursuant to RCW 36.70A.320(3) we "shall find compliance unless [we] determine that the action by [Jefferson County] is clearly erroneous in view of the entire record before the Board and in light of the goals and requirements of [the GMA]." In order to find the County's action clearly erroneous, we must be "left with the firm and definite conviction that a mistake has been made." *Department of Ecology v. Public Utility Dist. 1*, 121 Wn.2d 179, 201, 849 P.2d 646 (1993).

IV. ISSUES PRESENTED

Issue 1: Whether the adoption of a Tri-Area UGA in Ordinance Nos. 19-1213-02 complies with RCW 36.70A.020(11), -.035, -.040, -.070(preamble), -.130(1)(b), and -.140 regarding the processing and adoption of the Tri-Area UGA and associated Comprehensive Plan changes from the time of formal docketing until adoption?

Issue 2: Whether the designation of the Tri-Area UGA in Ordinance No. 19-1213-02 complies with RCW 36.70A.020(1), (2), (5), (6), (9), (10), (11), and (12), –.130(1)(b) regarding -.070(preamble), (1), (2), (3), (4), and (6), -.100, -.110(1), (2), (3), (4), and (5), -.150, -.160, and -210?

Issue 3: Whether the CP amendments in Section 7 of Ordinance No. 19-1213-02 comply with the GMA provisions listed in Issue 2 above?

Issue 4: Whether the land use capacity analysis for the Tri-Area UGA is adequate to comply with the GMA provisions listed in Issue 2 above?

Issue 5: Whether the analysis regarding the provision of urban services for the Tri-Area UGA is adequate to comply with the GMA provisions listed in Issue 2 above?

Issue 6: Whether the level of service standards for the Tri-Area UGA are adequate to comply with the GMA provisions listed in Issue 2 above?

Issue 7: Whether the services currently provided to the Tri-Area UGA are adequate to comply with the GMA provisions listed in Issue 2 above?

Issue 8: Whether the development levels currently allowed in the Tri-Area UGA are adequate to comply with the GMA provisions listed in Issue 2 above?

Issue 9: Whether the provisions added to the Comprehensive Plan by Section 7 of Ordinance No. 19-1213-02 create an internally consistent Comprehensive Plan consistent with the Land Use Map in compliance with the GMA provisions listed in Issue 2 above?

Issue 10: Whether the capital facilities planning and financing for the Tri-Area UGA is adequate to comply with the GMA provisions listed in Issue 2 above?

Issue 11: Whether the designation of the Tri-Area UGA is in compliance with the transformance of governance requirements of the GMA listed in Issue 2 above?

Issue 12: Whether the designation of the Tri-Area UGA leaves behind LAMIRDs on the boundary of the UGA that do not comply with RCW 36.70A.020(1), (2), (5), (6), (9), (10), (11), (12), and with -.130(1)(b) regarding -.070(preamble), -.070(1), -.070(5), -.100, -110, and -.210?

Issue 13: Whether the LAMIRDs left behind on the boundary of the Tri-Area UGA fail to comply with 36.70A.130(1)(b) and -.070(preamble), -.070(1), and -.070(5) by failing to provide descriptive text in the Comprehensive Plan to minimize, contain, limit, and control uses and intensities of uses in these remaining LAMIRD areas to protect rural character, avoid urban growth, and avoid a new pattern of more intense rural development?

Issue 14: Whether the County has failed to adopt development regulations to implement the Tri-Area UGA as required by RCW 36.70A.130(1)(b) and -.040?

Issue 15: Whether the development regulations adopted by Ordinance Nos. 18-1213-02 and 21-1220-02 to implement the Tri-Area UGA are adequate to comply with RCW 36.70A.130(1)(b) and -.040?

Issue 16: Whether any portion of the Ordinances found not to comply with the Act in Issues 1 to 15 above should also be found invalid under RCW 36.70A.302 for substantial interference with the fulfillment of Goals 1, 2, 5, 6, 9, 10, 11, and/or 12?

V. DISCUSSION AND ANALYSIS

When arguing and briefing the above issues, Petitioner combined portions of several issues into categories or topics. We will follow the same format in this decision, since that seems to be the more efficient way of dealing with Petitioner's concerns. Major topics to be discussed are: A: Timeliness of docketing of amendments; B: Adequacy

of the land capacity analysis; C: Completion of urban levels of service standards; D: Adequacy of capital facility planning, fiscal analysis and development regulations.

Topic A: Did the County fail to comply with RCW 36.70A.130(1)(b) regarding RCW 36.70A.070 (preamble) for not meeting RCW 36.70A.140 (Schedules and Procedures) when it adopted the Tri-Area UGA? (Portion of Issue 1.)

Positions of Parties

Petitioners claim that the County has failed to comply with RCW 36.70A.130(1)(b) regarding RCW 36.70A.070 (Preamble) ("A Comprehensive Plan shall be adopted and amended with public participation as provided in RCW 36.70A.140") for meeting RCW 36.70A.140 schedules and procedures when it adopted the Tri-Area UGA. RCW 36.70A.140 requires the County to adopt and follow public participation procedures for amending its Comprehensive Plan (CP). The County has such procedures in its CP at 2-6 (Ex. 17-1). The CP at 2-6 required 2002 CP amendments to be docketed by January 31, 2002. The County docketed its proposed Tri-Area CP amendment on April 30, 2002. (Ex. 1-1) On its face, this does not comply with the January 31, 2002 deadline set by the CP and therefore fails to comply with RCW 36.70A.140. ICAN's Opening Brief at 7-8.

The County responds that the January 31, 2002 deadline was removed from the CP during the 2002 amendment cycle. The January 1 date in the CP was never used by Jefferson County. The Jefferson County Unified Development Code (UDC) establishes May 1 as the application deadline. (UDC § 9.4.2). Further, UDC § 1.5.1 provides that the provisions of the UDC shall prevail over any conflicting provision of the CP. (UDC at 1-7). Thus, to the extent a prior CP provision established a different application deadline, the UDC's May 1 deadline controls. The County filed its Tri-Area UGA application on April 30, 2002, clearly meeting the May 1 application

deadline. Finally, the County points out that the timing of the UGA application was never raised by Petitioners during the public process. Jefferson County's Hearing Brief at 15-16.

Board Discussion

In Petitioner's oral argument at the Hearing on the Merits, Mr. Steel stated that ICAN did not want this procedural error to cause us to force the County to start its procedure all over again. This issue was raised to bring the County's attention to the fact that it must follow the procedures that it has established in its comprehensive plan. In effect, Mr. Steel withdrew the issue. Finally, Petitioner did not refute the County's charge that ICAN did not raise this concern during the County process. Further, we find the County's arguments laid out above to be persuasive. **Petitioners have failed to meet their burden of showing that the County clearly erred in docketing the Tri-Area UGA amendment on April 30, 2002.**

Topic B: Did the County fail to comply with the GMA when it designated the Tri-Area UGA because the land capacity analysis is flawed? (Portions of Issues 2, 3, 4 and 16.)

Positions of the Parties

Petitioner, in their opening brief, raised many arguments concerning their claim that the County's Land Capacity Analysis was flawed. We list a portion of those arguments below:

1) This Board has stated that it closely scrutinizes the establishment of non-municipal UGAs. *Abenroth v. Skagit County,* WWGMHB No. 97-2-0060c (Final Decision and Order, January 23, 1998) at 19-20.

2) When Jefferson County attempted to create an interim UGA in the Tri-Area in 1994, this Board ruled that this Tri-Area interim UGA did not comply with the GMA, stating:

> [A] proper analysis of land capacity, existing and future capital facilities impacts, and existing and future fiscal analysis must be made before an area outside the municipal boundaries of a city or cities can be established as either an interim or a comprehensive plan urban growth area.

***City of Port Townsend v. Jefferson County,* WWGMHB No. 94-2-0006 (Final Order, August 10, 1994) at 12**.

3) The County's residential land capacity analysis is flawed in several ways:

(a) The CP allocates a growth of 5,510 people to the City of Port Townsend and a growth of 1,165 people to the whole Tri-Area Planning Area. CP at 3-4.

(b) The County erred when it failed to explicitly allocate a portion of the 1,165 person growth to the Tri-Area UGA and a portion to the remaining Tri-Area Planning Area. The final adopted UGA covers only about 1/6 of the Tri-Area Planning Area.

(c) According to ICAN's calculations, Port Townsend has existing capacity of 5,910 more vacant lots than it needs for its 20-year population growth allocation.

(d) There are hundreds of acres of unplatted residential lands in the proposed Tri-Area UGA; these lands are not characterized by urban growth.

(e) This Board has consistently interpreted the GMA to require urban growth to go into cities and areas characterized by urban growth before going into areas not characterized by urban growth.

(f) The County's residential land use analysis makes unrealistic assumptions which have led to the substantially oversized residential lands in the Tri-Area UGA for the allocated population.

4) The County's Commercial/Industrial (C/I) capacity analysis is also flawed:

(a) The first two tasks in the County Special Study, began in 1998, were aimed at providing evidence that would support the County's desire to designate more C/I land in non-municipal UGAs.

(b) The County's first task, a Land Use Inventory Report, provided a reasonable tally of vacant and redevelopable C/I designated lands in the unincorporated county. That inventory report concludes that in 1999 the County had designated 573.4 acres of undeveloped C/I lands outside UGAs.

(c) In the 2002 CP amendments, the County enlarged the undeveloped C/I lands outside UGAs by adding about 90 industrial acres to Glen Cove, Eastview, and Brinnon. The County also added 75 commercial acres at other locations.

(d) The second task of the special study, the "Trottier Report," used several assumptions which magnified the numbers of acres needed for C/I development outside UGAs.

(e) According to ICAN's alternative assumptions and analysis, there is no need for additional C/I lands to be designated during the 20-year planning period.

5) The Tri-Area CP amendment should be found invalid because Port Townsend is only 3.5 miles away from the Tri-Area. Thus, the designation of a Tri-Area UGA substantially interferes with Goal 1 of the Act, which requires the County to encourage development in urban areas where adequate public facilities exist or can be provided in an efficient manner. When a non-municipal urban area is designated near a municipal UGA despite a land-use analysis showing no such need, there is substantial interference with the fulfillment of Goal 1 and the complete Tri-Area CP amendment should be found invalid.

The County responded:

1) The County did do an adequate analysis of land-use capacity in connection with designation of the Tri Area UGA. This analysis included:

(a) The Terralogic GIS updated existing land use inventories. Their report looked at C/I areas in Port Townsend and those established through the 1998 CP adoptions.

(b) The Draft Supplemental EIS (DSEIS) evaluated land supply and needs with regards to both commercial and residential land.

(c) Economic and Engineering Services, Inc. prepared estimates of C/I land development and needs (Trottier Report).

(d) The Tri-Area Special Study Final Decision Document reflects that adequate land was set aside in the existing CP to allow rural commercial and industrial development. There is also sufficient land in Port Townsend to accommodate urban residential growth in the future. However, it would be difficult, if not impossible, to meet the CPP goal of channeling 60% of new population into UGAs, absent the designation of the Tri-Area as a UGA.

(e) Port Townsend, in its CP, estimated that the City had the ability to accommodate 40% of the new growth. The findings of the County's Supplemental EIS indicate that the Tri-Area is able and likely to accommodate and serve the remaining 20% of urban growth.

2) Although Petitioner spends more than half of their brief arguing that there is no land use analysis justification for the Tri-Area UGA designation, the County is not using that rationale for designation of the Tri-Area UGA.

3) Jefferson County is not creating the Tri-Area UGA because there are no other lands where urban development can occur. Rather, the County recognizes that urban and commercial development already exist in portions of the Tri-Area, and there is a need to plan for and manage this existing development and inevitable future growth.

4) GMA provides that urban growth areas may be designated, not only in existing cities, but also in "lands already characterized by urban growth". RCW 36.70A.110(1).

5) Much of the Tri-Area is already characterized by urban density.

6) ICAN's Opening Brief acknowledges that the large number of platted lots of record in the Tri-Area make it certain that future development in the area will also involve urban densities:

> Much of the residential acreage in the Tri-Area UGA is fully platted. Attachment 1. Existing lot size averages 7,500 square feet (or 6 units per net acre) in the Tri-Area. ICAN's Opening Brief at 11.

7) Petitioners have failed to satisfy their burden of proving that the County's analysis of land use capacity and designation of the Tri-Area UGA was "clearly erroneous".

Board Discussion

This case presents a difficult situation assuredly not contemplated by the legislature when it enacted the GMA. However, it is a situation which faces this Board in at least three counties. We have three counties in our jurisdiction which have relatively low populations and only one incorporated municipality in the entire county. These are Mason, San Juan, and Jefferson counties. In each case, we have had to make some accommodation to allow the local government to designate a non-municipal UGA in a way that makes sense for those counties. In San Juan County, we have approved in concept the County's decision to designate two non-municipal UGAs (when adequate capital facilities analysis is completed) on two islands without incorporated cities. In Mason County, we have found a basis for a non-municipal UGA in Belfair :

> Overton argued that the CP created the potential for development of a small-scale village environment in Belfair, one that goes a long way to making urban development patterns attractive in largely rural Mason County. We agree. Given Mason County's limited resources and predominantly rural configuration, the County must be given latitude to implement new UGAs in a way that reflects its unique character.
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> ***Dawes v. Mason County*** **WWGMHB 96-2-0023 (CO 1-14-99)**

It is true that we have said in previous decisions that we would closely scrutinize the designation of nonmunicipal UGAs. We have also said that urban growth should first be directed to municipalities who could most efficiently use its current infrastructure to serve the additional urban population. On this basis, we would normally expect all

of Jefferson County's urban population to be directed to Port Townsend's more than amply sized UGA. (Port Townsend's UGA is also its city limits.)

On the other hand, we do not believe that a rigid adherence to this principle is necessary to be consistent with the overall planning policies embodied in the GMA when considering small counties with only one incorporated municipality. In a 1994 Jefferson County case, we stated:

> Our ultimate reason for existence is to make decisions that further the "planning" concepts, directions, goals and requirements of the GMA and, to a lesser extent, make determinations as to legal interpretations of the Act. We should not allow the flash of legal interpretation to blind us to the impact and realities of good planning decisions.
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> ***City of Port Townsend v. Jefferson County,* WWGMGB 94-2-0006 (Final Decision and Order, August 10, 1994)**

In this case, although Jefferson County has a fairly extensive land area, its population is less than 26,000. Jefferson County's only incorporated municipality, Port Townsend, has a large city limits in area, but a relatively small population (8,430). A considerable amount of the Port Townsend UGA (the same as its city limits) lacks urban infrastructure. At the same time, the older communities in the Tri-Area have many small lots already in existence. Given this difficult situation, in 1996 the City and the County agreed that 60% of the revised OFM medium population projection of 13,643 would be allocated to urban growth areas, and by implication that the City of Port Townsend would not be the only UGA. Of the 60% allocated to UGAs, Port Townsend agreed to a growth allocation of 5,510 additional residents or approximately 40% of the County's total projected population growth over the 20-year planning period of 1996-2016. The figures and approach agreed to by City and County staff were formalized by City of Port Townsend staff in a Summary of Understanding dated February 6, 1996. On February 14, 1996, the County adopted the same population projections and distribution in Resolution No. 17-96 entitled, "In the

Matter of a Resolution Adopting a Joint County and City of Port Townsend Growth Management Planning Population Projection, Consistent with the Provisions of County-wide Planning Policy 1.1." The County's Comprehensive Plan, adopted August 7, 1998, references these agreements (CP at 3-3) and also reflects the allocation of a growth of 5,510 people to the City of Port Townsend. CP at 3-4. The County's 1998 Comprehensive Plan states that approximately 40% of the new households over the 20-year planning period are anticipated to locate within the city limits of Port Townsend. CP at 5-2.

Petitioner IS now claiming that all of the urban projected population must be allocated to Port Townsend and none to a non-municipal UGA. Petitioner failed to file an appeal within 60 days of the February 14, 1996 adoption of Resolution No. 17-96, which officially adopted the allocations agreed upon by the County and the City of Port Townsend, consistent with the provisions of County-wide Planning Policy 1.1. Even if such a challenge were now timely, we would find that the 60/40% urban/rural split and the allocation of 5,510 people to the City of Port Townsend are appropriate under this record.

The County states that even though it did conduct an adequate analysis of land capacity, it is not basing its designation on need. Instead, it designated a small portion of the Tri-Area as a UGA to deal with historical de facto urban density in the Tri-Area. There is no perfect plan for this preexisting "quasi-urban" area. The County has had to be creative in dealing with this reality. Further, the County points out that if the County just ignored the situation, development on preexisting urban-sized lots would continue, potentially resulting in an ecological and health disaster. The County believes it is moving in the right direction and should be commended for that. We agree and commend them for their progress and hard work.

The County has also responsibly put in a proviso that until work to determine how urban service will be provided is completed, the rural development regulations will apply. Thus, the County is not encouraging urban development until urban services are available.

CPP 1.4 states:

> Port Hadlock and Port Ludlow are considered being "characterized by urban growth" for the purpose of designating UGA in the unincorporated county. The Tri-Area Community Plan and the Port Ludlow Master Plan will be utilized as a guide in the delineation of UGA boundaries based on the criteria above.
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> **CPP 1.4**

It is obvious that the Port Townsend and Jefferson County legislative bodies agreed that the Port Hadlock area of the Tri-Area was already characterized by urban growth years ago. Petitioner acknowledged the reality of the situation also

The detailed analysis presented in Petitioners' brief was done by ICAN's attorney after the UGA designation was adopted. It was not presented to County decision makers and therefore will be given little weight by us.

The County and the Petitioner point out that most of the top half of the Tri-Area UGA is platted with innumerable small lots. Although development of each lot may not be presently possible due to restraints on septic systems imposed as matter of public health (see CP at 3-5), the build out of those lots will still be at density levels that are not rural. We agree with the County that it makes more sense to plan to serve this community in an urban manner. By doing this, the County is making an ecologically responsible choice to provide urban services to an area of higher-than-rural densities rather than to allow it to develop permit-by-permit in a way that is dependent upon essentially rural levels of service. As the County says, it is being proactive and is

managing growth (the Act's intent) instead of burying its head in the potentially septic-waste-ridden sand. We agree that this approach complies with the GMA.

However, although a non-municipal UGA is appropriate for the Tri-Area, the boundaries of that UGA have yet to be based on a proper analysis of capital facilities needed to serve the new UGA. For this reason, we determine that the County was premature in designating the Tri-Area as a UGA, including final boundaries for the UGA.

At the hearing, the County stated that it needed to designate the UGA for sewer planning purposes and to give residents in that area certainty about the final boundaries of the UGA. We are sympathetic to that concern. The County could give that assurance through policy language in their plan that states that these are the final boundaries for purposes of sewer planning.

The final step in designating the UGA is capital facilities planning. If the capital facilities planning shows that the area can be provided with urban levels of services, this area will become a UGA. The reality of capital facilities planning, due to the considerable expense of providing urban services, is that this area is not likely to be enlarged, but it could be decreased.

The Department of Community, Trade and Economic Development, the agency charged with providing technical assistance to cities and counties planning under the GMA offers this advice on coordinating land use needs with capital facilities planning:

> The capacity of water and sewer represents an important consideration affecting development. The GMA requires that you must be able to provide adequate facilities and services before permitting development. Although capital facilities can be expanded, you will need to consider the cost-effectiveness of doing so and the appropriateness

> relative to community goals. If it will not be feasible to expand or extend a facility and finance the necessary improvements, the land use plan will need to be adjusted accordingly. For this reason, you must work back and forth between your land use analysis and your analysis of capital facility and transportation needs.
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> **Preparing the Heart of Your Comprehensive Plan, A Land Use Element Guide, Washington State Department of Community, Trade and Economic Development (1993) at 20 and 21**.

This is the step that needs to be completed before Jefferson County designates the Tri-Area as a UGA.

Petitioner has adamantly contended that there is no land use analysis justification for the Tri-Area UGA designation. We find that the County did do a land capacity analysis and that the Petitioner has not met the burden of proof that the land capacity analysis is clearly erroneous. Further, the County has consistently argued that in this special situation the County is not relying on that rationale for designating the Tri-Area UGA**. For all the reasons we have stated above, we find that the County, under these special circumstances, can establish a non-municipal UGA in the Tri Area. However, the final designation of the UGA and its boundary will have to await the completion of the other steps required that we will discuss later in this decision.**

Topic C: Must the County establish urban levels of service and provide urban services in the Tri-Area before it can be designated as a UGA? If yes, has the County failed to do so? (Portions of legal issues 2, 3, 5, 6, 7 & 16).

Positions of the Parties

Some of the major points made by ICAN in its May 9, 2003, Opening Brief include:

1) With the creation of the Tri-Area UGA, County-wide Planning Policy (CPP) 2.1 (Ex. 15-1) requires that the County provide a full range of urban services, including piped fire flow, storm water systems, and sanitary sewer. To violate this county-wide planning policy is a violation of RCW 36.70A.210(1), which requires comprehensive plans to be consistent with county-wide planning policies.
2) Sewer level of service – The County did establish a new level of service standard for sewer in the Tri-Area UGA. (Ex. 3-11, at 12-49). But the County has not implemented sewer service at the adopted level of service standard anywhere in the UGA. In order to comply with RCW 36.70A.130(1)(b) and .040(4), the County must reexamine its level of service standards and must reassess its development regulations to implement urban levels of service standards in the UGA.
3) Road level of service – The County does have urban service levels defined for roads. *See* CP at 12-49 to 12-50. However, with the adoption of a new Tri-Area UGA, the County must also have a concurrency ordinance for this area that meets the requirements of RCW 36.70A.070(6)(b) and prohibits new development if level of service standards are not met.
4) Water level of service – The County has created the Tri-Area UGA without establishing proper level of service standards for urban water service that are consistent with RCW 36.70A.030(19) (level "historically and typically provided in cities"). The County also has not explicitly addressed adequate provision of piped fire flow in its urban water standard as required by Ex. 15-1, CPP 2.1.
5) Police, fire and emergency medical services (EMS) level of service – The County has failed to set an improved urban level of service standard for police, fire, and EMS services in the Tri-Area UGA.

6) Storm sewers level of service – The County has set no level of service standard specifically for storm sewers for the Tri-Area UGA.
7) Solid waste and recycling collection level of service – The County has not set an urban level of service standard for solid waste and recycling collection in the Tri-Area UGA.
8) Transit level of service - In order to comply with RCW 30.70A.070(6)(a)(iii)(B), the County must establish a meaningful level of service standard for transit routes in the Tri-Area UGA that is sufficient to judge the performance of the system as it relates to the Tri-Area UGA. The County has failed to do so.
9) The County cannot properly do required fiscal analysis for the Tri-Area UGA without first establishing adequate urban service levels.
10) When the County fails to set urban service standards, it substantially interferes with the fulfillment of GMA Goal 12, which requires the County to ensure that urban services will be provided at urban standards set by the County. Therefore, all parts of the UGA CP amendment should be found invalid under RCW 36.70A.302(1)(b).

In its May 29, 2003 response brief, the County countered:

1) Petitioners' argument ignores the fact that until capital facilities planning is completed, development standards will remain "Rural". (Ex. 3-11 at 2-86).
2) The Tri-Area UGA will be implemented in phases, as development area "tiers" within the UGA are ready for urban levels of services and capital facilities planning is complete, then urban development regulations and LOS standards will be made applicable to those portions of the UGA.
3) ICAN has acknowledged that the County has established a new LOS for sewer which will apply in the Tri-Area UGA when facilities planning is completed. (Ex. 3-11 at 12-49).

4) Urban level of service standards are currently being developed for water, roads and other urban services in the Tri-Area UGA.
5) There is no requirement in the GMA that a local government must provide a full range of urban services upon UGA designation.
6) Petitioners state on page 22 of their opening brief,

> With the creation of the Tri-Area UGA through CP amendment, the County must reexamine its level of service standards for public facilities and services for their new UGA and must reassess its development regulations to implement urban level of service standards in this UGA.

That is exactly what the County is doing. Now that the boundaries are set, the County is reexamining the level of service standards and development regulations which will apply upon full implementation.

7) Until capital facilities planning is completed, existing rural LOS standards and development regulations will remain in place in the Tri-Area UGA.
8) Petitioners have failed to meet their burden of proving that using existing rural LOS standards and development regulations in the Tri-Area as analysis continues renders the UGA designation "clearly erroneous."

Board Discussion

We will deal with this topic and the following topic together. They are so closely intertwined that discussing them separately would require inefficient redundancies. See Board Discussion of Topic D regarding adequacy of capital facilities and fiscal analyses prior to UGA designation.

Topic D – Has the County failed to provide adequate capital facility planning and fiscal analysis for the Tri-Area UGA? (Portion of Issues 2, 3, 5, 10, and 16.)

Positions of the Parties

Petitioner claimed in their May 9, 2003 brief:

1) The County must perform a regional analysis of all Capital Facility Project needs, locations, and costs. *Achen v. Clark County*, WWGMHB No. 95-2-0067 (Second Compliance Order, December 17, 1997) at 5-6.
2) The County failed to do any capital facility planning and fiscal analysis for the actual boundary of the Tri-Area UGA. The final adopted Tri-Area UGA is about one-third larger than Sub-Unit 1, which was analyzed in the 1999 DSEIS. Thus, none of the cost or capital facilities analysis in the 1999 DSEIS can reasonably be used to determine the cost and capital facilities needed for the adopted UGA.
3) In addition, the 1999 DSEIS analysis deals only with sanitary sewer, water, storm water, and roads. There is no analysis for facilities and equipment for other important urban services such as waste and recycle collection, police, fire, EMS, street sweeping, and public transit.
4) The County should be found not to comply with the GMA requirements of RCW 36.70A.130(1)(b) and RCW 36.70A.070(3) and (6) for failing to provide capital facilities and fiscal analysis applicable to the final adopted UGA boundary.
5) The County failed to properly update its six-year and 20-year capital facility and fiscal analyses when it adopted the Tri-Area UGA. RCW 36.70A.070(3) and RCW 36.70A.130(1)(b)
6) The County must also be required to prepare an updated Transportation Plan under RCW 36.70A.070(6) to be consistent with and implement the plan for the new UGA. Ex. 20-21, at 13 indicates that road improvements will be necessary on SR116 as early as 2003 if a UGA is formed.

7) The County must adequately address all urban facilities needs prior to setting boundaries for a UGA, not after. Both RCW 36.70A.070(3) and (b)(a)(iv)(c) require such analysis before adopting a UGA.
8) When the County adopts a UGA but fails to do capital facility and fiscal analysis to ensure provision of urban services, it substantially interferes with the fulfillment of GMA Goal 12, which requires the County to ensure that urban services will be provided at urban standards set by the County. Thus, all parts of the UGA CP amendment should be found invalid under RCW 36.70A.302(1)(b).

Jefferson County in its May 29, 2003 Response Brief answered in part:

1) Designation of the UGA boundaries, with a plan for phased implementation, permits a rational and systematic method for creating and implementing a nonmunicipal UGA in the Tri-Area.
2) In order for final analysis of capital facilities needs to be accurate, the County must have a clear designation of where expected urban growth is to occur, and therefore, where capital facilities must be built and financed. In support of this contention, the County quoted the same paragraph from a previous Mason County decision that petitioners had quoted to support their position:

> Establishment of specific urban growth areas with finite boundaries and quantifiable allocation of population must first be made before any credible capital facilities analysis can be made. It is impossible to analyze future facilities' needs and costs if it is uncertain as to where population will be located and how far flung it will be.
> ***Dawes v. Mason County***, **WWGMHB No. 96-2-0023**
> **(Final Decision and Order, December 5, 1996)**

3) When a nonmunicipal UGA is designated, a "chicken-and-egg" situation arises: must all planning and capital facilities funding be established before the UGA boundary can be set, or should the logical boundaries of the UGA be

set first, allowing the most complete and accurate capital facility planning to occur within the designated area? Jefferson County concluded that the best approach in these circumstances was to designate a compact Tri-Area UGA and to continue with capital facilities planning within the boundaries of that UGA in a phased process. Sufficient analysis in several studies and groundwork has been laid to ensure that the boundaries of the UGA are appropriate.

4) The final UGA boundaries are very similar to those of "Subunit 1", which was analyzed extensively in the November 2001 Capital Facilities Study. (Ex. 20-21, Task V).
5) That study found that the Tri-Area has an abundance of buildable lots. This, coupled with a water system with capacity to serve the community indicates that the Tri-Area will continue to grow at a similar rate with or without a UGA designation. Thus, the existing six-year capital facilities plan for transportation and water should closely track the six-year capital needs under a UGA scenario. (Ex. 20-21, Task V, at 1).
6) The County has extensively studied transportation and water capital facilities needs. *See* Ex. 3-11, at 2-80; Ex. 20-21, Task V and Task III.
7) Since these evaluations were done, a new storage tank has been constructed to service the Tri-Area system, which has reduced the water capital facilities cost in the SEIS.
8) The Capital Facilities Special Study concluded that the principal gap in capital facilities for the Tri-Area UGA is the absence of a sewer system and suggested phased development of sewer as the most feasible and affordable approach. (Ex. 20-21, Task V at 23-26).
9) Further capital facilities planning is now underway to determine specific capacity needs, potential ownership, operations scenarios and funding requirements for sewers (Ex. 3-11, at 12-49). The County is in the process of

preparing a general sewer plan and an engineering report by the end of this year. In addition, the County will update its comprehensive plan in 2004. It is expected that the capital facilities needs and financing opportunities analysis for the Tri-Area UGA will be concluded and incorporated in the capital facilities chapter of the CP as part of the 2004 update process.

Board Discussion

In this discussion, we will include Topics C and D and a more general overview of the crux of this case: Must adequate capital facilities planning, fiscal analysis, urban LOS standards, and development regulations be completed and actual provision of urban levels of facilities and services be in place before official designation of a final urban growth boundary is permissible under GMA?

We agree with the County that certain UGA boundaries must be assumed in order to do capital facilities planning. However, those boundaries are not necessarily the final UGA boundaries, because the final UGA boundaries must be informed by the capital facilities planning. This is a very difficult "chicken-and-egg" situation. Jefferson County has concluded that the most logical approach in its current circumstances is to designate a compact Tri-Area UGA based on extensive analysis and groundwork to ensure that the UGA boundary is appropriate. And now that the designation is final, the County can focus on doing even more thorough and accurate capital facilities planning for application within that specific designated area. The County anticipates that the capital facilities needs and fiscal analysis for the Tri-Area UGA will be concluded and incorporated in the capital facilities chapter of the comprehensive plan as part of the 2004 update process.

In the 2002 CP Amendment Staff Report and DSEIS, the County explained its approach:

> The provision of adequate urban public facilities and services (e.g., sewer system) is required for implementation of final urban densities in the UGA. Therefore, implementation of the UGA will be planned in phases based, first, on completion of a community sewer study to identify the first phase or tier area within the UGA that can be provided feasible sanitary sewer and other services. Growth will be phased in the UGA concurrent with the application of appropriate urban levels of service for identified capital facilities. Existing or interim land use densities and intensities of use will remain in effect along with adopted interim levels of service for capital facilities until final urban levels of service can be provided (consistent with the implementation of a community sanitary sewer system) at which time final UGA densities and intensities of use can be applied to the portions of the UGA for which feasible sewer service can be provided concurrent with development.
>
> **Ex. 3-11, at 2-71 to 2-72**

The County further explained its approach in its May 29, 2003 response brief:

> The only category of capital facilities which has not been adequately analyzed in terms of infrastructure and financing is a sanitary sewer system. In order to have a fully functioning UGA in the Tri-area, it will be necessary for sanitary sewers to be constructed. However, the creation and construction of a large sewer system does not typically occur all at once. The County has determined that financing and construction of a sewer system would likely occur in some parts of the Tri-Area before others, where population growth makes financing feasible. Therefore, the County intends to fully implement the UGA in phases, based on completion of a community sewer study identifying the first phase or "tier" within the UGA which can be provided with sanitary sewer and other urban services.
>
> In other words, increased urban growth in the UGA will be phased concurrent with the application of appropriate urban levels of service for identified capital facilities. (Exhibit 3-11, p. 2-77, 2-78.) This concept recognizes that the implementation of final urban levels of service in the Tri-

> Area must involve community input, engineering studies and service provider information.
>
> The next phase of the development of the Tri-Area UGA (Phase 2) will involve preparation and adoption of UGA Overlay development regulations in the Unified Development Code (UDC), including new urban permitted land use tables and new bulk and dimensional standards for implementation based upon the current availability of the full range of urban public services (e.g., sanitary sewer). This phase will also involve the completion of further studies and necessary capital facilities plans. Development area "tiers" within the UGA will be identified, based on where the six year capital facilities plan is prepared to provide urban infrastructure concurrent with development. (Ex. 3-011, at 2-77, 2-78).
>
> Phase 3 of the implementation of the Tri-Area UGA will involve replacing the existing or interim permitted land use densities and intensities of use, and related development standards, in those portions or "tiers" of the UGA where the full range of urban services can be provided concurrent with development. (*Id*.)
>
> Jefferson County's conclusion that the phased implementation of the Tri-Area non-municipal UGA is the best means for accommodating the urban growth which exists in the Tri-Area, is consistent with the goals and policies of GMA.

County's Hearing Brief at 9-10

On the other hand, Petitioner claims that the Act specifically requires the opposite approach. A line can be set for study through a provisional UGA or other mechanism, but the UGA must not be formally designated as a final CP UGA until adequate capital facilities planning, fiscal analysis of the capacity to provide those facilities, urban LOS standards and development regulations are completed and urban services and facilities are actually in place.

The legislature, through RCW 36.70A.3201, instructed us to give added deference to local governments' GMA decisions. We try to give full consideration to local conditions when making our decisions. We acknowledge the enormous amount of time, energy, and money that the County has put into studies of the Tri-Area in the past nine years. We are concerned that the detailed analyses which Petitioner demands might make it prohibitively expensive for small or sparsely populated counties to plan for urban growth, thus thwarting one of the important purposes of the Act. We would therefore not expect the same level of planning in Jefferson County as in Clark or some of the other larger counties in our jurisdiction.

Further, we have previously said that when a county has very limited resources and a predominantly rural configuration, we will give latitude to implement new UGAs in a way that reflects the County's unique character. *Dawes v. Mason County*, WWGMHB No. 96-2-0023 (Compliance Order, January 14, 1999).

We understand the County's assertion that a large number of the Tri-Area citizens would like to sponsor an incorporation of at least part of the Tri-Area and are not allowed by GMA to do so until a Tri-Area UGA is designated. Further, we understand the County's strong belief that in this situation it needed to designate the Tri-Area UGA up front to send a strong message to its citizens that this UGA will happen. We are not convinced that strong policy language in the County's comprehensive plan that clarifies that the County's intent is to make these final UGA boundaries pending the results of capital facilities planning that shows that the area within these boundaries can be served with urban level capital facilities, could not achieve a similar effect.

We commend the County for providing that until capital facility planning and fiscal analysis are completed and level of service standards and development regulations are adopted, "Rural" regulations will remain in force. (Ex. 3-11, at 2-86)

Further, we commend the County for implementing the development of the UGA in phases or tiers and only when each tier of the UGA is ready for urban levels of service and capital facilities planning is complete, will urban development regulations and urban LOS standards be made applicable to that portion of the UGA.

We acknowledge that the County has established a new LOS for sewers. It is currently working on urban LOS standards for water, roads, and other urban services in the Tri-Area UGA. The County is also working on development regulations which will apply to each tier when it is ready for urban levels of service and capital facilities planning and fiscal analysis is complete for that tier.

At the Hearing on the Merits, the County stated that it wants guidance from the Board, but a finding of noncompliance would have negative impact on the County's efforts and morale. The County needs us to be flexible and work with the County rather than adding road blocks to completion of this difficult task. We do not want to have a negative impact on the County's commendable efforts, but we have been given the task of ensuring those efforts do comply with the Act.

Petitioners do not oppose the concept of the ultimate designation of a Tri-Area UGA. We agree with the County that this approach is responsible and that it is taking the high road ecologically in developing the Tri-Area UGA. However, having carefully considered all of the County's arguments and rationale, we remain concerned about the Tri-Area Final UGA being designated before adequate capital facilities planning for sewer, including fiscal analysis of the ability to provide those facilities, the setting of urban level of service standards and the adoption of development regulations that are ready for implementation in the UGA are completed. We agree with the Petitioners that these steps must be completed prior to designation to ensure that development within the UGA will be urban in nature, that the UGA will be efficiently

served with urban levels of service and that the County and its citizens can meet the financial obligations required for these urban facilities and services at the level of service adopted by the County.

The GMA requires that cities and counties show how they will be able to serve their UGAs with urban services over the life of their 20-year land use plan, and RCW 36.70A.070(3)(d) requires "at least a six-year funding plan that will finance within projected funding capacities and clearly identifies sources of public money for such purposes."

RCW 36.70A.110(3) states:

> (3) Urban growth should be located first in areas already characterized by urban growth that have adequate existing public facility and service capacities to serve such development, second in areas already characterized by urban growth that will be served adequately by a combination of both existing public facilities and services and any additional needed public facilities and services that are provided by either public or private sources, and third in the remaining portions of the urban growth areas …
>
> **RCW 36.70A.110(3)**

Reading these statutes together, the phasing that County wants to undertake when planning their sewer system for the Tri-Area is consistent with the GMA. While the County needs to show how they plan to provide capital facilities over the next 20 years to the Tri-Area, it is for the first six years of that capital facilities plan that a definite financing plan needs to be provided. The community sewer plan and a six-year capital facilities plan could fulfill this requirement and provide for the tiers of sewer development the County envisions, provided the county continues to do what it is doing now, keeping the development at rural density and intensity until urban services are provided.

The development of the community sewer plan has yet to begin and there must be a six-year capital facilities plan in place. The County's plans for Phases 2 and 3 should constitute adequate analysis and action for removal of the rural development regulations and standards, but these steps need to be done before designation, not after.

There is no provision in the plan as to what would happen if the County's sewer analysis of this designated area shows that providing urban services including sewer is not fiscally feasible. If we were to find compliance now, there might be no opportunity for Petitioners to appeal the designation of the UGA if the County determines that provision of urban levels of service, including sewers, is not possible. It may be true that urban residential development will occur regardless of designation. However, the southern half of the UGA is designated for urban commercial and industrial development. This premature designation is bound to set up a false expectation of urban commercial/industrial development which will be totally inappropriate if urban infrastructure is later found to be fiscally or politically infeasible.

We remind the County that when it first designated a much larger Tri-area IUGA in 1994, we said:

> Jefferson County has failed to comply with the Act by adopting IUGAs outside a municipal boundary without first conducting an analysis of and having available for elected officials and members of the public information on land capacity, fiscal impacts and capital facilities plans.
>
> ***City of Port Townsend v. Jefferson County*, WWGMHB #94-2-0006 (Final Decision and Order, August 10, 1994)**

No changes have been made to the requirements in the GMA since 1994 to negate the need for completion of adequate analysis and adoption of urban standards and regulations before formal designation of a UGA, either interim or final.

The goals have remained the same also. Goal 1 states:

> Goal (1) Urban Growth. Encourage development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner.

The intent of this goal is to put urban population where it can most efficiently and cost effectively be served. Therefore, one must know if it can be served with urban infrastructure and services before designation.

Goal 12 states:

> Goal (12) Public Facilities and Services. Ensure that those public facilities and services necessary to support development shall be adequate to serve the development at the time the development is available for occupancy and use without decreasing current service levels below locally established minimum standards.

There is no way the County can ensure such an outcome unless it has adopted urban level of service standards, finished its capital facilities analysis (especially sewer) and completed a fiscal analysis of affordability of those facilities before designating a UGA.

The Office of Community Development's October 1, 2002 letter to the County (Exhibit 4-23 at 2) reflects similar concerns:

> We have the following concerns that we recommend the county address before adopting the proposed comprehensive plan amendments:
>
> Tri-Area Urban Growth Area
>
> The staff report addresses the previous analysis and public outreach conducted in preparing for the proposed designation of the Tri-Area as an urban growth area (UGA), including the need to provide urban services to the area prior to implementing increased housing densities. The outstanding need for sewerage service to

> this area is in fact explicitly identified as the primary limiting factor preventing full realization of this UGA. We like the fact that existing rural zoning requirements will remain in effect until completion of a capital facilities plan and provision of a sewerage utility is clearly stated. We recommend that the county consider maintaining this area in its current status (as a provisional UGA) until the necessary interlocal agreements with service providers (i.e., the PUD) are in place, and capital facilities planning work is completed on at least the first phase of implementing sewer service.

It is not only the GMA and our previous decisions that lead us to that conclusion. The County's own CPPs require the same conclusion. CPP 2.1 states:

> The full range of governmental urban services at the adopted level of service standards will be planned for and provided within UGAs, as defined in the capital facilities plan, including community water, sanitary sewer, piped fire flow, and storm water systems. (Ex. 15-1)

We do not agree with Petitioners that the CPPs require all urban infrastructure to be in place before final designation of the UGA. CPP 2.3 indicates the opposite:

> New development will meet the adopted level of service standards for the UGA as a condition of project approval. Said standards will include interim provisions for those urban facilities identified in the capital facilities plan but not yet developed. New development will contribute its proportionate share towards provision of urban facilities identified in the capital facilities plan. (Ex. 15-1)

We find that the County has not complied with the goals and requirements of the Act by prematurely adopting a final GMA Tri-Area UGA before adopting urban level of service standards, finishing required capital facilities planning and fiscal analysis of affordability of those facilities and adopting development regulations for application within the UGA.

Petitioners have supplied us with no information or argument warranting their request for invalidation of the UGA CP amendment. A party claiming invalidity has the burden of proof of showing substantial interference with the goals of the GMA. *Achen v. Clark County*, WWGMHB No. 95-2-0067 (Reconsideration Order, December 6, 1995). We will declare invalid only the most egregious of noncompliant provisions whose continued validity most threaten the local government's future ability to achieve compliance with the GMA. *Abenroth v. Skagit County*, WWGMHB No. 97-2-0060 (Final Decision and Order, January 28, 1998). Petitioner makes the general claim, "When the County fails to set urban service standards, it substantially interferes with fulfillment of this Goal [Goal 6]." Such general claim, with no showing by Petitioner of the threat on the ground to the County's future ability to comply with the Act certainly does not meet Petitioner's burden. This is particularly true since the County has shown that rural standards will be in place until the required homework is completed. **Petitioner's request for a finding of invalidity is denied.**

Abandoned Issues

The County is correct in its assertion that the Petition for Review, as is reflected in the Prehearing Order, raised a number of issues that were abandoned or treated in only a cursory fashion in Petitioners' briefing. A review of Petitioner's briefing indicates that Petitioner has abandoned issues 9, 11, 12 and 13 in their entirety. Most of the other issues contained portions which were not briefed or only referred to in a general cursory statement. **We find that, except as to the categories of issues set forth in the previous sections of this order, Petitioner has failed to sustain their burden of showing that Jefferson County has failed to comply with the Act**.

VI. FINDINGS OF FACT

1) Jefferson County is a county located west of the crest of the Cascade Mountains that has chosen to or is required to plan under RCW 36.70A.040.

2) Petitioner is an organization that, through its members and representatives, participated in writing or through oral comments in the process at the County level.
3) Petitioner timely filed their petition for review on February 24, 2003.
4) Petitioner challenges Jefferson County's adoption of Ordinances 18-1213-02 and 19-1213-02, adopted on December 13, 2002, and Ordinance 21-1220-02, adopted on December 20, 2002, which amends Ordinance 18-1213-02. This challenge focuses on the designation and provisions relating to the Tri-Area Urban Growth Area.
5) Jefferson County has a fairly extensive land area, but its population is less than 26,000. Jefferson County's only unincorporated municipality, Port Townsend, has a large city limits in area, but a relatively small population (8,430). A considerable portion of the Port Townsend UGA (the same as its city limits) lacks urban infrastructure.
6) The older communities in the Tri-Area (Hadlock, Irondale and Chimicun) contain a plethora of small lots already in existence.
7) In 1996, the City and County agreed that 60% of the revised OFM medium population projection of 13,463 would be allocated to urban areas. Of the 60% allocated to urban growth areas, Port Townsend agreed to a growth allocation of 5.510 additional residents (approximately 40% of the County's total projected population growth over the 20-year planning period of 1996-2016).
8) On February 14, 1996, the County adopted those population allocations in Resolution No. 17-96.
9) The County's 1998 Comprehensive plan reflects the allocation of a growth of 5.510 people to Port Townsend. CP 3-4. No one appealed this allocation within 60 days of adoption as required by the GMA. Thus Petitioner is now barred from raising the city's allocation as noncompliant and as a basis to support their argument that the County's land capacity analysis is flawed.

10) The County designated a small portion of the Tri-Area as a UGA to deal with historical de facto urban density, assignment of the County's potion of the urban population allocation, and not on need.

11) The County has a proviso in place that until work is completed to determine how urban service (especially sewer) will be provided, the rural development standards and regulations will apply. Thus, the County is not encouraging urban development within the UGA boundaries until urban services are available.

12) The record shows that the City and County agreed in 1996 that the Port Hadlock area was already characterized by urban growth.

13) The record shows that the majority of the top half of the designated area is platted with innumerable small lots. Although development of each lot may not presently be possible due to restraints on septic systems imposed as a public health matter, the build out of these lots will still be at non-rural density levels even if no designation is made.

14) The County, at the time it designated the UGA in the Tri-Area, had not completed:

(a) adopting urban level of service standards;

(b) analyzing its capital facilities needs (especially sewer) and its fiscal ability to provide those needed urban facilities; and

(c) developing and adopting urban development regulations for application within the UGA.

~~VII.~~15) In order to comply with Goal 1 (Urban Growth), Goal 12 (Public Facilities and Services) and County Wide Planning Policy 2.1, all of the steps listed in Finding 14 must be completed before adoption of the non municipal UGA.

VII. CONCLUSIONS OF LAW

1) This Board has jurisdiction over the parties and subject matter of this petition.
2) Petitioner has standing to bring this appeal on the basis of their participation in the proceedings below and the timely filing of their Petition for Review.
3) Under the special circumstances faced by Jefferson County in this case, it is appropriate to establish a non-municipal UGA in the Hadlock/Irondale portion of the Tri-Area. However, Jefferson County failed to comply with the Act when it officially designated the UGA before completing its work of adopting urban level of service standards, finishing required capital facilities planning (especially for sewer) and fiscal analysis of affordability of those needed facilities, and developing development regulations for application within the UGA (or tiers thereof).

VIII. ORDER OF REMAND

This matter is hereby remanded to Jefferson County to bring the designation of the Tri-Area UGA into compliance with the Act.

If the County chooses to bring itself into compliance by merely rescinding the ordinances or portions thereof which relate to the official designation of the Tri-Area UGA, it must do so within 180 days. If the County chooses this path, it must submit a written report on compliance to this Board and to Petitioners in this case by February 27, 2004. A compliance hearing is set for April 13, 2004, at a time and location to be set by subsequent order. Any party wishing to contest the County's Compliance with the Act must submit written objection and reasons to us and the County no later than March 19, 2004. The County's response to any written objections shall be due no later than April 8, 2004.

This is a Final Order under RCW 36.70A.300(5) for purposes of appeal.

Pursuant to WAC 242-02-832(1), a motion for reconsideration may be filed within ten days of issuance of this final decision.

So ORDERED this 22nd day of August 2003.

WESTERN WASHINGTON GROWTH MANAGEMENT HEARINGS BOARD

Nan A. Henriksen, Board Member

Margery Hite, Board Member

Holly Gadbaw, Board Member