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**Regarding: Sultan Comprehensive Plan Update - 10 February 2004 CTED letter**

Dear Wendy and Rick:

We reviewed your comments provided in your 10 February 2004 letter concerning the Planning Commission's Proposal for a Comprehensive Plan Update of 8 December 2003. We provide the following response indexed to the numbered sequence of the bulleted paragraphs listed in your letter:

**1: You recommend adding policy statement in the environmental element acknowledging BAS use to protect the functions and values of critical areas.**

The basis for the environmental analysis conducted in the Comprehensive Plan Update and supporting EIS is specifically addressed in the response on pages 84-85 of the 6 June 2003 FEIS.

Per your recommendation, the "Goal: Respect the natural environment" on page 5 of the Planning Commission's Proposal of 10 February will be amended to state:

Enforce exacting performance standards governing possible developments within land or soil areas that are subject to moderate and severe hazards  
**"...using best available science (BAS) in accordance with RCW 36.70A.172 and WAC 365-195 Section 9."**

**2: You recommend adding a list of the critical areas required to be regulated under GMA in the environmental element.**

GMA's guidelines are listed in the critical area designation paragraph on page 93 of the 20 February 2003 DEIS.

Per your recommendation, the "Goal: Respect the natural environment" on page 5 of the Planning Commission's Proposal of 10 February 2004 will be further amended to state:

**"In accordance with GMA guidelines (RCW 36.70A.030(5)), critical areas subject to moderate and severe risk include wetlands, areas with a critical**

recharging affect on aquifers, fish and wildlife habitat conservation areas, frequently flooded areas, and geologically hazardous areas."

**3: You recommend that wetlands be rated consistent with WA DOE's Wetlands Rating System for Western Washington (Publication No. 93-074).**

Sultan wetlands are identified on page 62-63 of the DEIS. The basis for the identifications is further explained in the response on page 78-83 of FEIS.

Per your recommendation, "Goal 1: Tributary drainage" on page 5 of the Planning Commission's Proposal of 10 February 2004 will be amended to include:

***"Wetlands should be rated consistent with the Washington State Department of Ecology's Wetlands Rating System for Western Washington (Publication No. 93-074)."***

**4: You comment that the land use element does not show density calculations or zoning descriptions.**

Residential land use capacity calculations for the 1981, 1994, and 1995 UGA are summarized and described on page 101-103 of the DEIS. Land use calculations for residential capacity for the existing, and alternative 1-3 scenarios are summarized and described on page 17-18 summary and page 114-115 of the DEIS.

As described in the texts, these tables were calculated using Snohomish County Buildable Lands Analysis property parcel data that accounted for existing and potential use under the alternative development scenarios. DEIS pages 101-104 and the spreadsheet formulas list the assumptions used to project development and population capacities. The detailed spreadsheets that are summarized in the tables were not included in the Plan or EIS documents but is available from the city. As shown, the spreadsheets were based on calculations of net development density that exceeded the 4.0 dwelling unit urban growth area requirement.

Existing zoning designations and the extent of land devoted to various existing land uses are shown on page 110-114 of the DEIS

Since these materials are identified and analyzed in detail in the EIS documents, the Planning Commission did not find it necessary to replicate the discussions within the Plan's goal and policy statements

**5: You comment that the UGA expansion is not supported within the comprehensive plan.**

The basis for proposing, considering, and anticipating the impacts of the 3 UGA alternatives is described in detail in page 17-23 of the DEIS. The background for some of the 1981, 1994, and 1995 Plan north boundary issues that were proposed to be resolved by the UGA adjustments is further described in page 94-103 of the DEIS. The reasons for considering increasing employment lands in the UGA in order to achieve economic sustenance are described on page 132-138 of the DEIS.

The DEIS document proper projects and anticipates the possible impacts of all 3 alternatives on all elements of the physical and human environment including transportation and SR-2 — and is the proper venue for considering and evaluating any alterations to the UGA boundaries.

The Planning Commission is recommending Council adopt a hybrid alternative that resolves some property issues on the north boundary and provides for additional economic development potential. As shown on page 23 of the Plan - the proposed UGA adjustment would add 66.2 acres to the current (prevailing) UGA land total resulting in a projected residential holding capacity increase of 135 persons over the existing (prevailing) UGA. As shown on page 28 of the Plan - the proposed UGA adjustment would increase employment capacity by 1,026 jobs over the existing (prevailing) UGA.

Sincerely,

**THE BECKWITH CONSULTING GROUP**

**Tom Beckwith AICP, Principal**