

Project Strategies

10-Year Comprehensive Plan Update ■ Kitsap County ■ March 2006



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Chapter 1. Introduction

Kitsap County is required to complete its 10-Year Update to the Kitsap County Comprehensive Plan by the conclusion of 2006. The County has identified several desired outcomes:

- Providing a meaningful opportunity for the public to participate in shaping the vision and plan for 2025,
- Meeting the requirements of the Growth Management Act (GMA) for the 10-Year Update and the compliance order of the Central Puget Sound Growth Management Hearings Board,
- Streamlining the planning and environmental review process by combining State Environmental Policy Act (SEPA) and GMA requirements,
- Incorporating adopted and in-process Subarea Plans,
- Building a collaborative relationship with cities, tribes, special districts and other agencies in the County, and
- Having early and continuous County decision maker involvement in the process of affirming the 20-year vision, developing alternatives, selecting a preferred alternative, and adopting the plan.

The purpose of this document is to identify strategies to 1) integrate GMA/SEPA requirements, 2) to integrate Subarea Plans recognizing prior planning efforts and the need for a coordinated countywide plan, 3) meet key decision points allowing analysis and comment opportunities to proceed, and 4) build collaborative relationships with other agencies to prepare the capital facilities plan element. Under separate cover, we have identified public participation strategies and plan priorities to address other County objectives listed above. Also separately, we have worked with County staff to review proposed resolutions soliciting property owner land use reclassification requests.



Chapter 2. SEPA/GMA Integration Strategies

2.1. What is an integrated SEPA/GMA document?

An integrated SEPA/GMA document combines required comprehensive plan contents with required environmental analysis contents. An integrated Comprehensive Plan and EIS process dovetails public review requirements, avoids duplication of effort with similar GMA and SEPA requirements, and ensures that environmental analysis under SEPA occurs as an integral part of the planning and decision-making under GMA.

Kitsap County intends to prepare an environmental impact statement (EIS), update each of its Comprehensive Plan Elements, and integrate these documents. In numerous ways, the GMA and SEPA requirements can be integrated comprehensively and simply for informed decision-making. Plan inventories can serve as SEPA affected environment discussion; land use plan options can serve as SEPA alternatives; and plan policies and SEPA mitigation measures can inform each other.

The basis for SEPA/GMA integration is provided in the SEPA Rules. WAC 197-11-210 states that GMA counties and cities are authorized to integrate the requirements of SEPA and GMA to ensure that environmental analyses under SEPA can occur concurrently with and as an integral part of the planning and decision making under GMA. GMA counties and cities are authorized, but not required, to combine SEPA and GMA processes and/or to integrate documents. In either case, WAC 197-11-228 states that the appropriate scope and level of detail of environmental review should be tailored to the GMA action under consideration. Jurisdictions may modify their



phased SEPA review as necessary to track the phasing of GMA actions. The process of integrating SEPA and GMA should begin at the early stages of plan development.

State SEPA rules state that an “‘Integrated GMA document’ means a GMA document which contains or combines environmental analysis under SEPA” (WAC 197-11-220 (5)). There is no required format for an integrated Plan/EIS (WAC 197-11-235). However, the following contents are required for the SEPA portion of the integrated document: “An integrated document will constitute the necessary formal SEPA document, if accompanied by the following:

- (a) Environmental summary and fact sheet;
- (b) Concise analysis of alternatives;
- (c) Comments and responses; and
- (d) Appropriate technical and other materials.”

2.2. What elements will be addressed in the integrated document?

2.2.1. Topics

Both GMA and SEPA identify required contents for Comprehensive Plans and SEPA documents as shown in Table 2-1 below. Most topics are very similar and can be easily integrated. A range of natural environment and built environment issues will be addressed.

Table 2-1. GMA and SEPA Elements

SEPA Element	Kitsap Comprehensive Plan Element	Discussion
Fact Sheet		
Summary		
Alternatives		At the Draft Plan stage, the combined SEPA/GMA document Land Use Alternatives are serving as Plan Alternatives and EIS Alternatives. The final Preferred Alternative will be the basis for the Comprehensive Plan.
Affected environment, significant impacts, and mitigation measures	GMA Element requirements include inventories, plans and policies	The GMA inventory can be combined with the SEPA affected environment. The Plan policies can serve as mitigation measures.



SEPA Element	Kitsap Comprehensive Plan Element	Discussion
Natural Environment: Earth, Air quality, Surface water & Groundwater, Plants & animals	Natural Systems	
Land & shoreline use: land use plans, population, housing, aesthetics, cultural resources	Land Use, Housing, Economic Development, Shorelines	
Energy and natural resources	Rural and Resource Lands	
Environmental health (noise, hazardous materials)	Environmental health policies may be addressed in the Land Use and Transportation Elements	Noise and hazardous materials are topics typically addressed at a site-specific level rather than at a programmatic level. Noise will be qualitatively addressed in the 10-Year Update environmental analysis; hazardous materials analysis is not anticipated to be a focus of the programmatic Plan/EIS.
Transportation	Transportation	
Public services and utilities	Utilities, Capital Facilities Plan	

2.2.2. Proposed Integrated Plan Format

County staff reviewed integrated Plan/EIS samples from Kenmore, Sumner, and Yakima County, and non-integrated documents from Clark County and Spokane County. The County staff identified the Sumner Integrated Plan/EIS as their preferred format. That format provides two volumes for the Plan/EIS as indicated in Table 2-2. A template for both volumes of the Kitsap 10-Year Comprehensive Plan Update is provided in Appendix A.

Table 2-2. Proposed Plan Format

Volume	Contents
Volume I: Policy Document	Contains only a brief summary of the "key issues" identified in Volume II. Contains all policies and plans.
Volume II: EIS	Contains all GMA and SEPA required inventories in the "Affected Environment" Analyzes No Action and Proposed Action Alternatives Summarizes Plan policies and adopted regulations that serve as mitigation measures
Appendices	Capital Improvement Projects

Volume	Contents
	Silverdale Consolidated Inventory

Further discussion of subarea plan integration is provided in Section 3.

2.2.3. Level of Detail – Environmental Analysis

The proposed level of detail for environmental analysis can be summarized in three words – programmatic, areawide, and phased:

- **Programmatic:** The adoption of comprehensive plans or other long-range planning activities is classified by SEPA as a nonproject (i.e., programmatic) action. A nonproject action is defined as an action that is broader than a single site-specific project, and involves decisions on policies, plans or programs. (WAC 197-11-442) The level of detail for a programmatic document is broader than for a project action such as a proposed building or road.
- **Areawide:** An EIS for a nonproject proposal does not require site-specific analyses; instead, the EIS discusses impacts and alternatives appropriate to the scope of the nonproject proposal and to the level of planning for the proposal.
 - *Scales of Analysis – Countywide and Subarea:* It is expected that the Plan and EIS will have two scales of analysis: countywide and subarea. Information will be more specific at the subarea level than the countywide level. The subarea level will typically refer to UGAs, Rural Villages, etc. For some topics watersheds or basins may be referenced, e.g. surface water.
 - *Subarea Plans Detail:* Subarea plans that are completed or are in the process of environmental review will receive equivalent levels of environmental review in the 10-Year Update as in their current associated SEPA documents. Because the Silverdale Subarea Plan is being dovetailed with the 10-Year Update and is still in process, the 10-Year Update EIS will establish threshold levels, reference existing regulations, and prescribe mitigation measures for impacts to allow future development that falls within these thresholds or complies with prescribed regulations/mitigation to proceed with minimal future SEPA review.
 - *Land Use Reclassification Requests Addressed Cumulatively:* The land use reclassification requests will be addressed cumulatively in one or more alternatives, and will not receive site-specific review. An appendix may contain a brief description of each site-specific request and their conformance to County review criteria. However the discussion will be brief and based on the *programmatic* environmental analysis.
- **Phased:** Phasing allows environmental review to focus on issues that are ready for decision, while deferring decisions that require additional information. Phased review allows Kitsap County to focus on broad land use and policy



actions prior to the consideration of more detailed actions. The current phase of environmental review encompasses an EIS for the 10-Year Update of the Comprehensive Plan and selected development regulations (e.g. areawide rezones, TDR, or others that may be identified as high priorities). Subsequently, the County may issue supplemental EIS's, Declarations of Non-significance, and/or addenda for future actions such as implementing regulations, capital facilities, permits, etc.

Strategies for the Non-Project SEPA Analysis

The non-project SEPA analysis in Volume II of the 10-Year Comprehensive Plan Update will be most useful if it is simply written, concise, focuses on the most relevant impacts for the 10-Year Update, and proposes mitigation measures clearly for decision maker consideration and action. Following are some key points that will be used by the EIS authors in preparing the analysis:

- **Keep the terminology simple**—because the ultimate product is an EIS that will be subject to public review, the text needs to be understandable to people who may not have advanced education or technical training. As stated in the Washington Administrative Code: “Environmental impact statements shall be concise and written in plain language. EIS’s shall not be excessively detailed or overly technical.” (WAC 197-11-425[2])
- **Keep the affected environment/inventory section concise** recognizing we are at a Countywide level in most cases — provide only the information necessary to understanding the project and its impacts. Make the discussion “commensurate with the importance of the impacts” (WAC 197-11-440[6]). Encyclopedic descriptions of resources are not the goal—the goal is a clear context for understanding the proposal and its impacts.
- **Impact analysis should keep in mind SEPA’s definition of significance:** “a reasonable likelihood of more than a moderate adverse impact on environmental quality” (WAC 197-11-794[1]). The analysis should consider both the magnitude and duration of the impact, and the context in which it would occur. “The severity of an impact should be weighed along with the likelihood of its occurrence. An impact may be significant if its chance of occurrence is not great, but the resulting environmental impact would be severe if it occurred” (WAC 197-11-794[2]). Because the analysis addresses a 20-year plan when discussing impacts, the analysis will use “would” not “will.”
- **Impact analysis should distinguish between common impacts of the alternatives versus unique impacts** – the environmental analysis will use the following progression in addressing impacts to help decision makers determine how they want to potentially modify an alternative plan:
 - Impacts Common to All Alternatives (Area Specific and Cumulative)



- Impacts of No Action Alternative
- Impacts of Preferred Alternative (Alternative One)
- Impacts of Alternative Two
- **Impact analysis will distinguish direct and indirect impacts:** Direct effects are those that occur at the same time and place as the proposed action, and indirect effects are those that are caused by the action but occur later in time or farther away. Direct effects include such things as potential removal of vegetation in an area. Indirect effects include things like changes in area land use patterns, increased growth or population, economic ripple effects, and so forth. For a programmatic EIS on a long-range planning action, much of the discussion will be about indirect impacts since it is development allowed by the Plan that would result in impacts over time.
- **Consider three types of mitigation measures related to the GMA Plan:**
 - Incorporated Plan Features – “self mitigating” features of the alternatives, Applicable Regulations and Commitments – adopted codes/regulations, and Other Potential Mitigation Measures – newly proposed policies and plans and development regulations. Other Potential Mitigation measures may require County action in comparison to those measures already a part of alternatives or already a part of regulations.
 - *Incorporated Plan Features – Example:* “Features of the Lakewood Alternatives that help reduce land use compatibility impacts include: Alternative 1 Urban Low Density Residential along the perimeter provides a gradual transition from the more dense uses in English Crossing and Interchange areas. Non residential uses along the rail line proposed in Alternatives 2 and 3 would expose less residents to potential noise/safety effects of the rail line, although the type and setback of non-residential uses should be considered for safety purposes.”
 - *Applicable Regulations and Commitments – Example:* “All new developments would be required to meet International Building and Fire Code requirements for built-in fire protection systems (alarm and sprinkler systems).”
 - *Other Potential Mitigation Measures – Example:* “Reduce impervious surface area by adopting new development requirements that set maximum limits on the percentage of impervious area allowed and increase the infiltration of surface water.”



2.3. What will an integrated document achieve for the County?

The integrated SEPA/GMA document is intended to achieve the following benefits for Kitsap County:

- The combined documentation will reduce the number and size of documents that the public and County decision makers would otherwise review, since similar GMA and SEPA information and analysis can be combined instead of contained in separate documents, e.g. GMA and SEPA inventories.
- The public comment periods required by GMA and SEPA will be combined into one, i.e. a single 60-day comment period instead of separate plan and EIS comment periods, and the public workshops and hearings will address appropriate Plan/EIS topics together. The public should find a single comment period and multi-purpose meetings more straightforward and an effective use of their voluntary time.
- The two-volume format will facilitate plan monitoring, implementation, and amendment. The streamlined policies and plans volume will be easier to reference by regular readers and users, e.g. during review of land use permits. Future annual amendments will focus on policies and plans rather than on out of date text – the inventory and analysis in the EIS will be updated by future SEPA documents that accompany plan amendments.



Chapter 3. Subarea Plan Integration

The County wishes to recognize prior planning efforts while preparing coordinated countywide plan. The County adopted its 1998 Comprehensive Plan and then adopted or is in the process of adopting the following subarea plans:

- Keyport Rural Village Sub-Area Planning Process – in progress
- Kingston Subarea Plan – 2005
- Manchester Local Area of More Intense Rural Development (LAMIRD) – 2002
- Port Orchard UGA/Sub-Area Planning Process – in progress
- Poulsbo Subarea Plan – 2001
- Silverdale Sub-Area Planning Process – in progress
- South Kitsap Industrial Area (SKIA) – 2003
- Suquamish Rural Village Subarea Plan – 2005
- ULID #6 Subarea Plan addressing South Kitsap Urban Joint Planning Area (UJPA) – 2003

The subarea plans address either rural or urban areas and provide a closer look at land use, transportation, services, etc. Policies and subarea plan maps are more specific to the location. Because they are tailored to specific areas, sub-area plans are not required to include all of the elements or policies that are required for full comprehensive plans.

The County desires to integrate adopted subarea plans into the overall countywide 10-Year Comprehensive Plan Update. Subarea Plans for UGAs that are in process for South Kitsap/Port Orchard and Silverdale will also be integrated into the 10-Year



Update. Subarea Plans that are in process for rural areas are not directly related to the 10-Year Update and can be considered in 2007 as part of the County's annual amendment process as appropriate. For Silverdale, the County has also indicated to the public that it would create a subarea plan that can be easily "pulled out" and used as a complete comprehensive plan should the area incorporate as a city.

Strategies to integrate the subarea plans include:

- *Transfer Subarea Plans into the Plan's Two Volumes:* Each Subarea Plan will be included in the 10-Year Update Comprehensive Plan by incorporating inventory and analysis into the EIS and creating a separate policy chapter for each Subarea Plan in the Policy Document (see Chapter 2 above).
- *Streamline Subarea Plan Chapters Focusing on Unique Plans/Policies:* Each Policy Document Chapter/Element will include a brief background summary, a section describing the subarea plan vision and how the subarea relates to the countywide vision, policies, and plan maps. Each Subarea Plans' unique policies and plans will be included in each subarea chapter.
- *Consolidated Silverdale Plan in Appendix:* In order to allow the Silverdale Sub-area Plan to be integrated into the County Comprehensive Plan and easily extractable if needed, we recommend that:
 1. Volume 1 -- Specific plan policies for the Silverdale Sub-area should be contained in the Silverdale Sub-area Element of the County Comprehensive Plan. In order to avoid repetition of policies, the Silverdale Sub-area Plan will not contain policies that are countywide in nature. Policies that should be incorporated if this Sub-area Plan is used as the basis for a new city comprehensive plan will be listed and cross-referenced in the Sub-area Plan Element (an index).
 2. Inventory/background data from Volume 2 that applies to Silverdale should be integrated in the body of the document and consolidated in an appendix to the EIS. If needed, the consolidated inventory could be easily extracted and used as part of the new city's comprehensive plan if the area incorporates.



Chapter 4. Key Plan Decision Points

In order to meet the compressed timeframe for this project, it is critical that the project team remain aware of and build toward key decision points. Table 4-1 identifies the key decision points in this project, the timing for these decisions and the steps that the Consultant team will take to build toward these decisions. Each of these decisions lays the foundation for the next step in the project, as is shown in Table 4.1. A more detailed schedules aligning with the general dates in the table has been provided, most recently for a February 2006 progress report.

In particular, it should be noted that the timing of the identification of the Preferred Alternative is critical for the subsequent analysis and evaluation of alternatives that follows. In order to allow time for the capital facilities and transportation analyses, this decision must occur no later than July. This decision point is highlighted in Table 4-1.

Table 4-1. Key Decision Points

BOCC Review or Decision Point	Leads to or is necessary for:	Timing	Strategies
Affirm Vision and Plan Update Priorities	Focuses efforts in Phase II Plan Update, and guides topics to be addressed at visioning workshops	Mid-March	Prepare Plan priorities and Vision Analysis; summarizing and reviewing analysis with BOCC Advertise Scoping Notice for 21 day comment
Review employment allocation methods	Selecting method will help determine employment forecasts and distribution Employment forecasts will provide a starting point for land use/UGA	Late March/ Early April	Provide a range of employment forecast approaches for decision maker input; Provide future flexibility to adjust alternatives following the forecasting stage.



BOCC Review or Decision Point	Leads to or is necessary for:	Timing	Strategies
Determine the range of Plan/EIS Alternatives	<p>discussions, and set bookends for environmental analysis.</p> <p>Allows study of options -- preliminary analysis of alternatives will help guide the selection of a Preferred Alternative in July. EIS will address all Alternatives; Draft Plan will focus on Preferred to focus resources and time.</p>	May	<p>Advertise for individual land use reclassification requests in March – coinciding with Scoping Notice</p> <p>Prepare No Action Alternative in March to allow transportation analysis</p> <p>Prepare employment forecasts</p> <p>Prepare alternatives for joint BOCC/Planning Commission review in early May prior to workshops</p> <ul style="list-style-type: none"> ▪ “High” alternative could be the inclusion of all land use reclassification requests and “moderate” alternative could be the inclusion of requests that match the evaluation criteria <p>Following early BOCC/Planning Commission input, review alternatives at public workshops for input</p> <p>Bring alternatives back to BOCC/Planning Commission to affirm the range for analysis</p>
Determine a Preferred Plan	<p>Allows Draft Plan to be developed around a likely alternative – necessary for Capital Facilities Plan and Transportation Plan. This is the most critical point in the schedule.</p>	July	<p>Intensive review of Alternatives in May (above)</p> <p>Preliminary analysis of No Action and Highest Growth Alternative to set the maximum range and allow discussion of intermediate alternatives</p>
Prepare the Draft Plan	<p>Allows agencies and the public to comment on proposed plans and policies as well as the integrated SEPA review.</p>	<p>Issue Draft Plan/EIS in late August; hearings in September</p>	<p>Draft Plan/EIS completion following selection of a Preferred Alternative</p> <p>Draft Plan and EIS provide information and analysis for public review and informed choices by the County decision makers</p> <p>Public workshops early September</p> <p>Public hearings late September</p>



BOCC Review or Decision Point	Leads to or is necessary for:	Timing	Strategies
Approve the Plan and associated development regulations	Following BOCC direction on an amended plan, team will prepare the formal Final Plan and EIS for adoption in early December	November	Public hearings late September Planning Commission deliberations and recommendation BOCC deliberations Following BOCC approval in concept, preparation of Final Plan/EIS for adoption, early December



Chapter 5. County-Agency Coordination and the Capital Facilities Plan

Kitsap County elected officials and staff regularly coordinate with special districts, cities, and tribes through the Kitsap Regional Coordinating Council (KRCC) and by scheduling specific individual meetings to address issues of mutual concern. With the fast-track schedule to complete the Comprehensive Plan Update, it will be very important to coordinate with these groups as early as possible to confirm meeting dates and ensure adequate time for Comprehensive Plan discussions. A challenge for some individuals in these groups may be a lack of time to spend engaged in this process – based on their other community commitments.

A particular need in the 10-Year Update is to prepare a Capital Facilities Plan, which identifies the necessary capital improvements to meet planned growth for *at least* a six-year period¹. County, city, tribal, and special districts provide capital facilities for growth in their respective jurisdictions, and all will need to contribute to the County’s Capital Facilities Element/Plan. Given that the Capital Facilities Plan will be prepared based on the “preferred” land use plan, to be identified in July 2006 and that

¹ According to the Growth Management Act, the Plan/Element is described as: A capital facilities plan element consisting of: (a) An inventory of existing capital facilities owned by public entities, showing the locations and capacities of the capital facilities; (b) a forecast of the future needs for such capital facilities; (c) the proposed locations and capacities of expanded or new capital facilities; (d) at least a six-year plan that will finance such capital facilities within projected funding capacities and clearly identifies sources of public money for such purposes; and (e) a requirement to reassess the land use element if probable funding falls short of meeting existing needs and to ensure that the land use element, capital facilities plan element, and financing plan within the capital facilities plan element are coordinated and consistent. Park and recreation facilities shall be included in the capital facilities plan element.

a full Draft Plan is due in August, it will be extremely challenging to complete a Capital Facilities Element/Plan in that timeframe.

In order to make the most use of County and non-County agency time in the compressed 10-Year Update schedule, the following process is recommend

- Distribute the 1999 Capital Facility Plan inventory to County departments to edit, addressing current conditions – January
- Obtain utility/agency contact list from KRCC staff – February
- Prepare letter introducing 10-Year Update from County officials to contact list – March
- Follow up specific data request to update 1999 Capital Facility Plan inventory – March
- Distribute 2025 No Action population assumptions at the TAZ level and estimate population (roughly) by each service jurisdiction boundary – February/March
- During scoping period, invite agencies to a meeting and provide 2012 and 2025 population assumptions for their jurisdiction; ask service providers to the best of their ability determine capital facility needs based on the population assumptions – March
- Review initial plans provided by service providers – May
- Provide a description of the Preferred Alternative (and associated growth numbers) identified by the BOCC and Planning Commission; ask if having the Preferred Land Use Plan would alter the initial capital facility plans that were based on 2025 population allocations – July
- Incorporate revised capital facility plans into the Draft Comprehensive Plan for public review – August
- Following September public hearings, Planning Commission deliberation, and BOCC approval in early November, provide amended Plan to service providers to determine if capital facility changes are necessary – November
- BOCC adoption – early December



Chapter 6. Summary

This document discusses several project strategies, each of which is important for the successful completion of this project within the established schedule. These strategies are listed below, together with any outstanding issues associated with each.

SEPA/GMA Integration

Kitsap County intends to integrate its SEPA/GMA documents and to follow an integrated SEPA/GMA process. That format provides two volumes for the Plan/EIS. The integrated SEPA/GMA document is intended to achieve the following benefits for Kitsap County:

- The combined documentation will reduce the number and size of documents that the public and County decision makers would otherwise review.
- The public comment periods required by GMA and SEPA will be combined into one, i.e. a single 60-day comment period. The public should find a single comment period and multi-purpose meetings more straightforward and an effective use of their voluntary time.
- The two-volume format will facilitate plan monitoring, implementation, and amendment.

Sub-area Plan Integration

Kitsap County will integrate all adopted sub-area plans into the County Comprehensive Plan, each as a separate chapter. For Silverdale, the County will incorporate the Sub-area Plan into the County Comprehensive Plan, but will also provide for easy extraction and use as a stand-alone comprehensive plan.



Key Decision Points

Table 4-1 identifies key decision points, their role in this project and suggested strategies to ensure that these decisions can occur in a timely manner.

County/Agency Coordination and Capital Facilities Plan

In order to meet the schedule for the Comprehensive Plan Update, it is very important to coordinate with agencies that provide information to the Capital Facilities Plan as early as possible. Chapter 5 outlines the proposed steps required to make the most use of County and agency time and complete the Capital Facilities Plan in the compressed time frame.



Appendix A: Document Templates
