

WCA Freeland UGA Comments

Dean Enell - January 16, 2026

Below is a comment from Whidbey Climate Action. I compliment all involved parties within Island County for this thorough and comprehensive document which addresses these valuable and needed components required within our current GMA update.

That said, I'm going to focus on what I feel is a major shortcoming within this update. That missing piece is an action plan to materialize some of these goals and visions in one crucial area. With our initial comp plan 26 years ago we went to great effort and expense to create an NMUGA in the fast growing business community of Freeland. As specified in 4 of the 14 State [GMA goals](#) we wanted to avoid sprawl and get a decent percentage of new growth and development to occur within our new NMUGA. Unfortunately - that has not occurred in all these years. We continue to have around 85% of new growth occurring within the rural areas of South & Central Central and Camano Island (per Island County data).

Admittedly, this dilemma precedes the tenures of the current County administration and planning departments. Despite the considerable attention with our initial 1998 Comp Plan and with every update since then, it still eludes us. Over the years, considerable sums of money and time have been devoted to creating such a functional NMUGA in Freeland including the formal designation, zoning plans, over 100 public meetings and a Freeland sub Area Plan. All of these were contingent upon developing the required infrastructure within said UGA, a sewer.

The Freeland Water and Sewer District clearly lacks the bandwidth for such a project as demonstrated in their 2 previous attempts and current statements about the future of a Freeland sewer. 'Never again', they say. What is lacking in your current GMA update is any sort of a formal **action** plan to get that sewer built. The only appropriate lead agency to accomplish this missing piece is Island County.

How to get started with a UGA Sewer in Freeland

I have spoken with the head of the Jefferson County Public Works which successfully launched a sewer for their NMUGA at Port Hadlock in September of 2025. They are enthusiastic about meeting with appropriate I.C. personnel to basically tell us 'how it was done'. As you know they have received considerable positive press from various State agencies for completing this infrastructure which addresses multiple goals and basically the very purpose and goals of State GMA legislation that was passed 25 years ago. For your reference, these goals were ..adopted to guide the development and adoption of comprehensive plans and development regulations of those counties and cities that are required or choose to plan under RCW **36.70A.040**.

The current I.C. revision of our Comp Plan contains numerous goals and visions to accomplish State GMA legislation, but unfortunately it lacks any concrete steps to actively address these. I'd like to see an action plan to create a sewer and thus a functional UGA in Freeland in this revision. Absent that, we'll just continue to drift further away from the visions defined within past and now a current GMA revision.

What did it say about UGA infrastructure in your 2016 MMA update? On A3.5.4.2 under New Facilities it says:

A.3.5.4.2 New Facilities The Freeland Water and Sewer District is developing a new plan to install and operate a sewer system in the Freeland UGA. An updated Sewer System Plan was developed in April of 2016. The plan has a phased approach to installing sewer in the Freeland UGA. The most recent estimate is to begin construction of the treatment facility in 2017, though many details, including financing, are still being worked out. **It is important that the County become an active participant in providing sewer, water, and drainage facilities for any non-municipal Urban Growth Areas in cooperation/coordination with water and sewer districts.** Provision of an optimum number of these services at the least possible costs to local citizens requires intergovernmental coordination at the county and subregional level to economize operations. **It must be noted that the location and design of these future utility services will be extremely instrumental in promoting urban development. If Island County is to maintain control over guiding this growth, then it is important that Island County serve as a lead organization in the planning and provision of these utility services.**

The **current** I.C. revision of our Comp Plan contains numerous goals and visions to accomplish State GMA legislation, but unfortunately it lacks any concrete steps to actively address these - just like the 1016 comp plan referenced above. I'd like to see an action plan to create a sewer and thus a functional UGA in Freeland in this revision. Absent that, we'll just continue to drift further away from the visions defined within past and now a current GMA revision.

Moving to our current 2026 GMA Update

In the colored text below I have copied those visions and observations which are included in our current GMA draft, but lack defined plans or measures to actually satisfy these goals anywhere within this draft.

As said on page 2 in your summary of key themes in the memorandum from planning staff to Commissioners and Planning commission regarding consensus reached on interim needed within this GMSA update:

Utilize creative housing solutions that fit into the rural landscape, accommodate housing at all income levels, and direct the majority of new housing to areas where density already exists.

On page 3 the following key theme is listed:

- **Infrastructure:**

- **Combined the Capital Facilities and Utilities Elements.**
- **Updates to the County's 6- and 20-year capital facilities project lists.**
- **Planning for septic and sewer infrastructure to support housing.**

Now moving to page 2 of your Dec 25 Comp Plan Revision Draft we find:

1.3.1.3 RURAL TO URBAN SHIFT In Island County, past development trends and land use regulations fostered a dispersed pattern of land use development. The County must now plan for growth in the context of a largely fragmented and dispersed land use and ownership pattern, which does not align with the philosophy of growth established under the GMA. A key concept is directing future growth and development within existing dense areas (i.e. LAMIRDs, UGAs) to conserve Island County's DRAFT Island County 2025 Comprehensive Plan – LAND USE ELEMENT 6 natural resources, critical areas, open space, and rural characteristics. Major steps were taken during this Comprehensive Plan to overcome these past challenges. The County's objective is to create efficient and attractive urban and rural communities while adhering to the goals and guidelines of the GMA. Joint planning efforts with municipalities are required to successfully shift growth to urban areas throughout the county. The Freeland area is the only urbanized area within the County's jurisdiction and is empowered to help shape the rural/urban split of development. This rural-to-urban shift will be a consideration during the development of each comprehensive plan element.

This UGA has not added any substantial growth in 25 years, so where's the initiative that's going to change this trajectory?

Your draft goes on to say:

In the Clinton Subarea Plan, the County proposes a study to explore the possibility of Clinton becoming a NMUGA, which will also support dense growth similar to the Freeland NMUGA. If Clinton becomes a NMUGA, it will allow more growth to be allocated to Clinton in future planning periods.

Absent a sewer, Clinton will suffer the same fate as current UGA, Freeland, it seems to me. What's the point in creating another non functional NMUGA?

Your draft goes on to say:

The Capital Facilities Plan outlines the next steps towards determining a wastewater solution for the Freeland NMUGA.

In 1.4.2.2 FREELAND NON-MUNICIPAL URBAN GROWTH AREA (NMUGA) you say

"The County recognizes that a sewer system and systems to manage stormwater are needed if this area is to achieve the densities associated with the NMUGA"

You state on page 314 of the combined draft:

"GMA Requirements for the Capital Facilities Element (CFE) (RCW 36.70A.070(3)): A. An inventory of existing facilities owned by public entities, including green infrastructure, showing their locations and capacities; B. A forecast of the future needs; 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. Reassessment of 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 with the Capital Facilities Plan Element are coordinated and consistent. Parks and recreation facilities shall be included in the Capital Facilities Element"

Can you point me to that 6 year funding plan in bold text above? I couldn't find it?

On page 321 it states:

10.3.3 ESSENTIAL PUBLIC FACILITIES The GMA (RCW 36.70A.200) requires that each local jurisdiction planning under the GMA provide a process within its comprehensive plan for identifying and citing essential public facilities.

Why isn't the Freeland sewer list on page 324 as a required capital facilities element?

In 1.4.2.2 FREELAND NON-MUNICIPAL URBAN GROWTH AREA (NMUGA), it states

"The County recognizes that a sewer system and systems to manage stormwater are needed if this area is to achieve the densities associated with the NMUGA. Freeland currently has a Public Water and Sewer District with the authority to annex and create Utility Local Improvement Districts (ULIDs). The Capital Facilities Plan outlines the next steps towards determining a wastewater solution for the Freeland NMUGA."

So, going to the capital Facilities Plan, on age 30, I find:

Goal 6. Provide adequate public facilities to UGAs. CFU 6.1. Require urban-level sanitary sewer or equivalent service in all UGAs.

I'm sure I could go back to your 1998 Comp Plan or to numerous revisions to that plan since then, and find a similar goal. When is that goal going to be realized? Where's the PLAN to create that sewer system within the Freeland NMUGA?

CFU 6.1.2. Tells us to "Utilize large on-site sewage systems (LOSS), community septic systems, or individual on-site sewage systems combined with the installation of dry lines as an interim

means to achieve urban densities within the UGA until such time sanitary sewer service is available.

CFU 6.1.5. Pursue wastewater solutions for the Freeland Non-Municipal Urban Growth Area (NMUGA).

CFU 6.1.4. In the Freeland NMUGA, consider the use of alternative sewage treatment techniques in areas that contain a significant concentration of critical areas, will be impacted by extreme rain and coastal flooding, or which have topographic challenges, discharge constraints, or critical aquifer recharge areas. CFU 6.2. Research tools and methods for capital facilities and amenities to meet or exceed the baseline goals needed to address growth needs. CFU 6.3. Prioritize Island County expenditures for public services and capital facilities in UGAs as an incentive to encourage development in urban areas. CFU 6.4. Negotiate with municipalities and other providers of public facilities to coordinate planning for and development of UGAs. CFU 6.3. Prioritize Island County expenditures for public services and capital facilities in UGAs as an incentive to encourage development in urban areas. CFU 6.4. Negotiate with municipalities and other providers of public facilities to coordinate planning for and development of UGAs. CFU 6.4.1. The County and all municipalities shall conduct joint planning of associated UGAs to identify methods, costs, and funds to extend urban services and achieve urban densities or to define alternative UGA boundaries

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The following statement needs to be clarified. CFU 7.111.2. Planning for utilities is the primary responsibility of the utility providers and must be coordinated consistent with the County Comprehensive Plan.

On page 23 of your Land Use Element it is stated:

In the past, Growth Management Hearings Board (GMHB) decisions dictated that lots smaller than 10 acres in the rural area should be scrutinized to assure that they do not constitute urban growth, do not unduly threaten large scale natural resources or critical areas, will not thwart the long term flexibility to expand the UGA, and are consistent with the goals and requirements of the GMA. Lot sizes shall be an appropriate minimum density as provided by the GMA.

Your draft states: The Capital Facilities Plan outlines the next steps towards determining a wastewater solution for the Freeland NMUGA.

CFU 6.1.1. Establish regulations for development that require sewer connectivity between UGA parcels or tracts. CFU 6.1.2. Utilize large on-site sewage systems (LOSS), community septic

systems, or individual on-site sewage systems combined with the installation of dry lines as an interim means to achieve urban densities within the UGA until such time sanitary sewer service is available.

CFU 6.1.3. In accordance with Island County Health and Washington State requirements, require connection to a public sewer system for new or extensively remodeled development located within 200 feet of a public sewer system. CFU 6.1.5. Pursue wastewater solutions for the Freeland Non-Municipal Urban Growth Area (NMUGA). CFU 6.1.4. In the Freeland NMUGA, consider the use of alternative sewage treatment techniques in areas that contain a significant concentration of critical areas, will be impacted by extreme rain and coastal flooding, or which have topographic challenges, discharge constraints, or critical aquifer recharge areas

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Going to the Capital Facilities Plan I find you list I.C. as one of the responsible parties for Sewer infrastructure on page 3.

Goal 6. Provide adequate public facilities to UGAs. CFU 6.1. Require urban-level sanitary sewer or equivalent service in all UGAs.

As above, I have to ask, where's the action plan" for this goal #6?

Summary

I'm pretty sure our GMA requirements are to accomplish the goals and objectives we've identified and listed in this Draft Comp Plan revision. As mentioned, such accomplishment will certainly and obviously not materialize without a definitive action plan and responsible parties to make it happen. That party is quite obviously Island County (Public Works and or Health Department). As also mentioned above, Jefferson County was able to get a sewer operating in their Port Hadlock this year where after a NMUGA designation decades ago.. They undertook this task for the same reasons we face with our non functional and very similar NMUGA. As noted, I've made contact with the head of the Jefferson County Public Works dept who is willing to meet and share with us the lessons learned and how they accomplished this feat.