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Ellie Myers
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Public Comment in Opposition to "Brown Road Estates II" (Short Plat Application SP-26-00010)

Ms. Myers,

I am writing to express my strong opposition to the proposed short plat application for Brown Road Estates II (SP-26-00010). The applicant's request to subdivide two 5-acre parcels into 2.5-acre parcels violates both the intent of the local zoning code and the foundational principles of Washington's Transfer of Development Rights (TDR) program.

The proposed short plat is located in an area strictly zoned as Agricultural 5 (Ag 5), which establishes a clear 5-acre minimum lot size to protect rural character and agricultural viability. Furthermore, these parcels directly abut Ag 20 zoning. Allowing 2.5-acre high-density rural residential lots here creates an incompatible transition zone and encroaches upon the more intensive agricultural operations protected under the Ag 20 designation. The 5-acre minimum should be strictly maintained to serve as a necessary buffer.

Beyond the zoning conflict, the application suffers from a serious lack of administrative transparency and procedural compliance. The applicant has completely failed to disclose the sending parcels for their intended TDR credits within any of their submitted public application documents. A proposal relying on density bonuses must provide clear, accessible documentation regarding the source of those credits so the public and reviewing agencies can properly vet them. This omission alone should stall the application until full disclosure is made.

Through conversations with the County Planning Department, it is understood that the applicant intends to utilize Parcels 016833, 962710, 962711, and 962712 to secure these TDR Density Credits. These specific parcels should be completely disqualified from consideration. While they technically sit outside current city limits, they are either entirely unincorporated islands or located immediately adjacent to the city boundary. Crucially, all four parcels lie well within the Urban Growth Area (UGA).

The primary intent of a TDR program is to conserve long-term resource lands, active farms, and critical ecological zones by transferring development potential into urban centers. Utilizing parcels within the UGA—lands already designated for future urban absorption and infrastructure development—defies the purpose of the program. It allows the applicant to artificially double rural density in an Ag 5 zone without achieving the genuine, long-term agricultural preservation that TDR programs are legally enacted to secure.

Approval of SP-26-00010 would set a dangerous precedent, effectively allowing developers to use urban-adjacent UGA lands to bypass rural zoning protections and increase density next to protected Ag 20 farmlands—all while omitting these vital details from the public record. I urge the Planning Department to deny this application and require the applicant to adhere to the established 5-acre minimum lot size required under Ag 5 zoning.

Thank you,

Luke Bergford