Exhibit "12"

Wilbur Ellis Tank Farm

Skagit County Special Use Permit Narrative Requirements

1. Describe your proposal/business.
It is proposed to construct a liquid fertilizer tank farm to support the current business operations on the Wilbur Ellis Site.

2. Describe what days and hours will your operation be open.
Operating hours are currently Monday through Friday, 7 am to 3 pm.

3. How many employees will you have?
Employee count will not change due to the new liquid fertilizer tank farm.

4. What will your employees' working hours be?
Employees working hours will not change due to the new liquid fertilizer tank farm.

5. Will employees work on site?
Currently employees work onsite.

6. How many employees will work off-site?
No employees will work off-site due to the new liquid fertilizer tank farm..

7. Describe the location and size of any signs you propose to advertise your operation.
No new signs.

8. How do you propose to screen your operation from public view? E.g., plants, shrubs, fences.
Landscaping with plants and shrubs is proposed on the east side of the site to screen the adjacent residence.

9. Describe your proposed parking area.
No proposed parking area, existing parking for employees is located at the main office.

10. Describe your schedule, including any phasing, for development of your operation.
The current development will include the construction for 13 tanks with additional space for 11 more, for a total of 24 when complete. The future tanks will be constructed over the next 1-10 years, as the demand from the farming community increases.

11. Describe the expected traffic impact of your operation on public roads.
No impact expected.

12. Describe any internal road system your operation will have.
No new road system.

13. Describe how your operation will be accessed.
The site will utilize the existing access point from Bayview Edison Road; no new access point.

14. Describe any heat from machinery or equipment that your operation will generate.
No new heat from machinery or equipment.

15. Describe any noise your operation will generate.
No new noise will be created by the tank farm.

16. Describe any odors your operation will generate.
No new odors will be generated by the new fertilizer tank farm.

17. Describe any steam, smoke, or dust your operation will generate.
No steam, smoke or dust will result from the operation of the tank farm.

18. Describe any vibrations your operation will generate.
No vibrations will result from the operation of the tank farm.

19. Describe any heavy equipment or machinery your operation will use.
No new/additional heavy equipment or machinery will be used to operate the new liquid fertilizer tank farm.

20. Describe any chemicals, waste oil, solvents, fuel, etc, your operation will store.
No chemicals, waste oil, solvents, fuel, etc. will be stored at the new liquid fertilizer tank farm.

21. Describe your plan for disposal of any chemicals.
No chemical will be disposed of.

22. Describe your plans to prevent trespassing by employees, customers, or visitors to adjoining property.
The site is currently fenced, trespassing is not an issue currently, and not expected to be.

23. If your operation will use a building please describe the size, height and construction type. This building must be shown on the site plan.
No buildings are proposed, the tanks will support the current Wilbur Ellis operations.

24. Describe the sewage disposal plan for employees and the public.
No new need for sewage will be required for the tank farm.

25. Describe the water supply for employees and the public.
No new need for service will be required for the tank farm.

26. Address any fire flow issues.
The tank farm will be constructed of non-combustible materials.

27. Demonstrate that the proposed use is compatible with the neighboring properties.
The proposed tank farm supports the existing use of the Wilbur Ellis business. Wilbur Ellis supplies agricultural products to the farmers in the Skagit Valley and vicinity. The neighboring uses to the existing Wilbur Ellis Company are farming to the north, farming and a single dwelling to the northeast, commercial uses to the south and industrial use to the west.

28. Demonstrate that the proposed use complies with Skagit County Code. Please cite code section.
The site is already developed and meets the Skagit County Code. Per the original Special Use for the new tank farm, BP16-0579, the existing business and tank farm meet County code uses, SCC14.16.400(4)(c) allows for expansion of existing uses.

29. Demonstrate that the proposed use will not create undue noise, odor, heat, vibration, and air or water pollution on surrounding, existing, or potential dwelling units, based on the performance standards of SCC 14.16.840.

Per 14.16.840:
SCC 14.16.840 (2): Storage tanks will not cause vibrations.
SCC 14.16.840 (3): Storage tanks will not produce heat, glare or steam. If lighting is installed it will be downcast using cutoff fixtures.
SCC 14.16.840 (4): Storage tanks nor their contents will create electrical disturbance.
SCC 14.16.840 (5): Storage tanks nor their contents will create noise.

30. Demonstrate that the proposed use will not generate intrusions on privacy of surrounding uses.

The new tank farm does not intrude on privacy of surrounding uses, it may provide a bit of privacy to the neighboring industrial use to the west.

31. Demonstrate that proposed use will not cause potential adverse effects on the general public health, safety, and welfare.

The proposed use will be sited adjacent to the existing facility to avoid adverse effects of the industrial use to the general public.

32. For special uses in the Industrial Forest-NRL, Secondary Forest-NRL, Agricultural-NRL, and Rural Resource-NRL zones, demonstrate that the impacts on long-term natural resource management and production will be minimized.

The existing Wilbur Ellis development included this future tank farm; the tank farm area was pre-loaded and previously graveled. There is no expansion nor impacts to the long term natural resource management lands surrounding the existing development.

33. Demonstrate that the proposed use is not in conflict with the health and safety of the community.

The expansion is proposed in conjunction with a bona-fide existing agricultural support service consistent with zoning code requirements and will be constructed and operated accordingly.

34. Demonstrate that the proposed use will be supported by adequate public facilities or services and will not adversely affect public services to the surrounding areas, or conditions can be established to mitigate adverse impacts on such facilities.

The proposed tank farm expansion will be supported by existing public services in a manner consistent in a manner consistent with the existing Wilbur Ellis facility. Water will be provided by the Skagit PUD in a quantity sufficient for fire suppression. Health and police service requirements should not increase due to the tank farm.

35. Demonstrate the proposed use will maintain the character, landscape and lifestyle of the rural area. For new uses, proximity to existing businesses operating via special use permit shall be reviewed and considered for cumulative impacts.

The proposed tank farm is located on an existing gravel pad, adjacent to the existing Wilbur Ellis facility. The tanks will not materially change the landscape and lifestyle of the community, but provide additional support to the existing farming community.