



# Planning & Development Services

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## Memorandum

To: Board of County Commissioners  
From: Robby Eckroth, Senior Planner  
Date: February 4, 2025  
Re: Docket Request to Expand Anacortes Urban Growth Area to Include City Owned Properties

### Summary

This memo is being provided in advance of the work session scheduled for February 11, 2025 and public hearing with possible action scheduled February 25, 2025, regarding the docketing of the proposed Anacortes UGA expansion. The City of Anacortes has submitted a docket petition (Exhibit A) to expand its Urban Growth Area (UGA) as part of the 2025 Skagit County Periodic Comprehensive Plan update. The petition seeks to incorporate nine (9) city-owned parcels, totaling 107.24 acres, into the Anacortes UGA, which are shown on the parcel map in Exhibit B. The parcels are currently being used—and will continue to be used—for recreational purposes. One of the parcels is also used for Anacortes Public Works soil storage in addition to a trail use. The City is requesting that all of these parcels be zoned under the Anacortes UGA Urban Development District. Additionally, the City plans to apply a Parks zoning designation to the properties on the Anacortes Future Land Use map. Once annexed, these lands will be assigned the Parks zoning designation on the Anacortes Zoning map. These city-owned parcels will not be used to accommodate City population, housing, or employment growth targets. On December 2, 2024, the City of Anacortes City Council adopted a Resolution supporting the proposed UGA expansion (Exhibit C).

In accordance with [SCC 14.08.030\(1\)\(b\)](#), cities must submit a docket petition to modify a UGA boundary. If the petition is docketed, the decision to approve the UGA expansion will be made as part of the 2025 Skagit County Periodic Comprehensive Plan update.

**Department Recommendation:** The Department recommends that the requested UGA expansion be docketed to be considered as part of the 2025 Skagit County Periodic Update to the Comprehensive Plan.

### Process

SCC Chapter 14.08 provides the following criteria for analyzing petitions:

- Petitions for amendments are accepted until the last business day of July of each year.
- The Department analyzes the petitions against the docketing criteria in SCC 14.08.030 and issues a recommendation to the Board. (See Petitions and Department Recommendations section below.)

- The Board holds a public hearing to allow applicants and the public to comment on the docketing recommendation.
- The Board must decide which petitions to include in the docket at a subsequent meeting under SCC 14.08.040. The Board has three options with respect to any proposal:
  - include a proposal for docketing;
  - defer the proposal until the next annual amendment cycle; or
  - exclude the proposal without prejudice.

**The Board’s decision to include a proposed amendment in the docket is procedural and does not constitute a decision as to whether the amendment will ultimately be approved. If docketed, the decision to approve the UGA expansion will occur with the rest of the 2025 Skagit County Periodic Update to the Comprehensive Plan.**

The petitions included in the docket move forward for SEPA analysis, Department of Commerce review, legal review, and subsequent review by the public, Planning Commission, and the Board through the process described in SCC 14.08.080–090.

## **Background**

The City of Anacortes is requesting to expand the Anacortes UGA to incorporate nine (9) city owned parcels totaling 107.24 acres. The city is requesting to add parcels P20029 (20 acres), P60751 (3.04 acres), P60752 (5.74 acres), P60763 (5.74 acres), P60777 (2.86 acres), P19298 (20 acres), P19211 (0.54 acres), P19056 (40 acres) and P32547 (9.32 acres). All these parcels, except for P32547, are currently used exclusively for recreational purposes and will continue to be used in this capacity. The city-owned parcels are all zoned Rural Reserve (RRv), with the exception of P32547, which is zoned Rural Resource – Natural Resource Lands (RRc-NRL).

The City is requesting to expand the UGA to incorporate the city owned parcels because the City manages the properties and would eventually like jurisdiction over those areas. This will allow a less complicated permitting process for city-managed lands and reduces the need for County staff to process permits on land owned and managed by the city.

## **Analysis**

### **Urban Growth Area Expansion**

The City is requesting an expansion of the Anacortes UGA to include the nine (9) parcels outlined above. The City is requesting that the parcels be zoned under the Anacortes UGA Urban Development District (A-UD). Per SCC 14.16.220(2), development in the A-UD zone is required to be consistent with the use, lot size and other development standards for the zone that has been identified by the city for the parcel that is the subject of the application. The City intends to designate these properties as Parks on the Anacortes Future Land Use map. Once annexed, the parcels will be assigned the Parks zoning designation on the Anacortes Zoning map. The parcels will not be used to accommodate population, housing, or employment growth targets and will be used for recreational and city operational uses only.

A change to a UGA boundary is required to meet the criteria outlined in [SCC 14.08.060\(4\)](#) and [\(5\)](#). SCC 14.08.060(4) stipulates that a UGA boundary change must be supported by the analysis specified in that section. The intent of the required analyses is to justify the need UGA boundary changes for the purpose of accommodating 20-year population and/or employment growth targets. The City of Anacortes did not provide the analysis as the UGA expansion request will not be for the purpose of accommodating growth. The City is not requesting this boundary change for growth purposes, but rather for recreational and operational needs. Additionally, the criteria in SCC 14.08.060(5) apply to UGA boundary changes meant to accommodate growth targets and therefore are not relevant to this request.

### **Rural Resource - Natural Resource Lands De-Designation**

Parcel P32547, a 9.32-acre site, was once a permitted gravel pit operated by Lakeside Industries and is zoned Rural Resource – Natural Resource Lands (RRC-NRL). Mining operations have been completed, and in 2001, Lakeside deeded the property to the City of Anacortes. The parcel currently features a Parks Department trail on its northern portion, while the southern portion is used by Public Works for soil storage. Although zoned RRC-NRL, the gravel at the site has been depleted, and the parcel is no longer a viable gravel pit.

[SCC 14.08.060\(3\)](#) requires changes from a natural resource land map designation must also recognize that natural resource land designations were intended to be long-term designations and must be supported by and dependent on one or more of the following:

- a) A change in circumstances pertaining to the Comprehensive Plan or public policy;
- b) A change in circumstances beyond the control of the landowner pertaining to the subject property;
- c) An error in initial designation;
- d) New information on natural resource land or critical area status.

In their submitted application, the City addresses the criteria in SCC 14.08.060 by explaining that the property's gravel resources were exhausted around 2000. At that time, the owner deeded the land to the City, as it no longer held any natural resource value. Since then, the property has been utilized by Anacortes Public Works for soil storage and provides trail access to an adjacent City Park. Given that the property no longer contains natural resources and is now used for City operational and recreational purposes, the City has requested the removal of the NRL designation and an expansion of the Anacortes UGA to include the property for future annexation.

### **Department Docketing Criteria**

SCC 14.08.040 requires the Department to make a recommendation to the Board as to which of the petitions the Department should be included in the docket. The Department must consider each of the following factors ("the docketing criteria") in making its recommendation:

- (a) The petition complies with the filing requirements;*
- (b) The proposed amendment, in light of all proposed amendments being considered for inclusion in the year's docket, can be reasonably reviewed within the staffing and operational budget allocated to the Department by the Board;*

- (c) A proposed amendment, to be adopted, would not require additional amendments to the Comprehensive Plan or development regulations not addressed in the petitioner’s application, and is consistent with other goals, objectives and policies adopted by the Board;*
- (d) A proposed amendment raises policy, land use, or scheduling issues that would more appropriately be addressed as part of an ongoing or planned work program, or as part of a regular review cycle;*
- (e) Some legal or procedural flaw of the proposal would prevent its legal implementation; or*
- (f) The proposal lacks sufficient information or adequate detail to review and assess whether or not the proposal meets the applicable Comprehensive Plan designation criteria. This does not preclude the Department from asking for additional information at a later date.*

The Department has reviewed the docket petition for consistency with SCC 14.08.040 and has found that it is consistent with the criteria listed above.

### **Department Recommendation**

The Department recommends that the requested UGA expansion be docketed to be considered as part of the 2025 Skagit County Periodic Update to the Comprehensive Plan as the petition complies with the docketing criteria listed in SCC 14.080.040.

### **List of Exhibits**

**Exhibit A** – Application with Supplemental Questions

**Exhibit B** – Parcel Map

**Exhibit C** – Anacortes Resolution Supporting UGA Expansion Request