

# Skagit County 2025 Periodic Comprehensive Plan Update

## Planning Commission - Public Comment Summary Matrix

*Disclaimer: Skagit County has reviewed all public comments submitted regarding the Planning Commission draft of Skagit County’s 2025 Periodic Comprehensive Plan. The table below provides a high-level summary of the comments received and includes additional context and explanations to help inform the Planning Commission as they evaluate comments at the April 8 continued public hearing and make a recommendation to the Skagit County Board of County Commissioners. The comment summary may also assist residents and stakeholders who are interested in the written comments provided to the Planning Commission.*

*Please note that all public comments have been forwarded in full to the Skagit County Planning Commission for their review and consideration. The Commission will evaluate these comments and determine whether to recommend changes to the draft 2025 Periodic Comprehensive Plan. Changes included within the Planning Commission recommendation will be included in the draft forwarded to the Skagit County Board of County Commissioners.*

*The Board of County Commissioners will conduct its own separate review process, which includes additional opportunities for public input (both written and oral comments). Information about the Board’s process, including meeting schedules and how to participate, is available on the County’s website at [www.skagitcounty.net](http://www.skagitcounty.net).*

*This summary is provided for informational purposes only and does not represent final decisions or policy actions.*

<b>Comment #</b>	<b>Type/ Category</b>	<b>Element</b>	<b>Comment Summary</b>	<b>Response</b>
<b>1</b>	Forest Resilience	Climate Resilience	Provided a matrix of recommended policies.	Skagit County staff is considering these comments and will include a recommendation to the Planning Commission.

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2; 35; 48; 63	Ag. Land	Natural Resource Lands; Rural	In favor of goals and policies that protect farm and agricultural lands.	In alignment with these comments, the overall vision of the Comprehensive Plan remains the same from the original vision and comments collected from the first plan in 1965 which called for Farmland Preservation. Skagit County staff is considering these comments and will include a recommendation to the Planning Commission.
3	Stormwater; Critical areas protection	Environment; Climate Resilience	Strengthen the Comprehensive Plan to better address the Cumulative Impacts from new development of stormwater runoff on critical areas and Artificial Light at Night (ALAN) on both humans and salmonids.	All development in Skagit County is required to comply with the Critical Areas Ordinance (SCC 14.24) and the Stormwater Management code (SCC 14.32), which is consistent with the 2019 Stormwater Management Manual for Western Washington. Amendments to the Critical Areas Ordinance will be considered by the Planning Commission in April and May of this year.
4; 58	Goals; Policies	Transportation	Suggestion to include WSDOT in Goal 8A in the Transportation Element. Suggested revisions to draft goals and policies.	Skagit County staff is considering these comments and will include a recommendation to the Planning Commission.
5	Mineral lands; Geological hazards	Natural Resource Lands	Suggestions from Department of Natural Resources (DNR) to the Natural Resource Lands section and references to DNR resources.	Skagit County staff is considering these comments and will include a recommendation to the Planning Commission.
5	Geological hazards	Environment	Natural Hazards Mitigation Plan Update 2023 not referenced in 2014 and associated policies.	Skagit County will review language to ensure the Comprehensive Plan is consistent with most recent County adopted documents.
5	Critical areas	Environment	Suggest including statement describing geological hazard areas in the County and add a map here.	Skagit County does not have regulatory geological hazard maps and relies on state and federal mapping and individual site visits to identify geological hazard areas.

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<b>6; 8; 10; 13; 14; 15; 17; 19; 22; 23; 25; 26; 27; 32; 39; 40; 45; 50; 52; 56; 58; 59; 60; 62; 64; 66; 69</b>	Policy	Land Use; Housing	Comments raised concerns about the new provision of policy 3C-1.6. Allowing certain housing types along with increased densities should not be coupled together. Oppose the Rural Village Residential up to “4” DU per acre	<p data-bbox="1157 269 1955 367">Geological hazards are defined in CAO, consistent with GMA. The CAO will be considered by the Planning Commission in April and May of this year</p> <p data-bbox="1157 378 1955 727">Skagit County is required to provide 501 housing units over the next 20-years to individuals who earn between 51-80% of the area median income (AMI). Housing at 51-80% of the AMI would not include single-family detached housing, which is more expensive. Housing types, such as manufactured homes, tiny homes, duplexes, or triplexes. To address this issue, the county is considering the allowance of gentle density in some Limited Areas of More Intense Rural Developments (LAMIRD) where the growth would be consistent with the requirements in RCW 36.70A.070(5).</p> <p data-bbox="1157 773 1955 1008">It is important to note that Skagit County is utilizing the Housing for All Planning Tool (HAPT), Method C for housing. Method C does not include any allocation of housing growth at 0-50% AMI, which would result in multi-family housing. Allocation Method A and B would have allocated 0-50% AMI housing to rural areas. This would be inconsistent with rural character and require urban services, which are not allowed in rural areas.</p> <p data-bbox="1157 1057 1955 1401">This housing allocation was reviewed through the Skagit Council of Governments and approved in the Countywide Planning Policies by the Board of County Commissioners in March, 2025. Single-family housing types in rural areas outside of LAMIRDs are not affordable to households earning less than 80% of the area median income. The increase in density proposed is intended to provide options for housing types affordable to the appropriate area median income level and satisfy GMA requirements mandated under RCW 36.70A.070 approved as part of HB 1220 (2021). The adjustments to densities in LAMIRDs</p>

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				<p>are consistent with requirements in RCW 36.70A.070(5) to ensure new housing is supported by capital facilities and services and to maintain rural character. Gentle density revisions follow updated GMA requirements in order to meet new housing requirements.</p> <p>Lastly, as part of community engagement, the need to provide options for more affordable housing types for people who live and work in rural areas was strongly expressed. This includes housing so people who work in rural areas can live closer to where they work. More affordable housing types can also allow someone to downsize their home while staying in the community.</p>
<b>6; 8; 13; 18; 19; 22; 39; 40; 51; 52; 56; 58; 66; 71; 76</b>	Growth Allocations	Housing	Recommend encouraging residential growth in cities and towns.	Skagit County has identified several policies in the Urban, Open Space, section of the Land Use Element intended to reduce the overall growth targets for unincorporated areas (primarily rural areas) to further protect and prevent the inappropriate conversion of rural and resources lands to residential or commercial lands. In addition, 80% of the growth planned for the next 20 years is allocated to cities and county policies are focused on continuing to work with SCOG and the cities to further focus on infill redevelopment over time. However, Skagit County is also subject to recent state law changes as part of HB 1220 which requires all jurisdictions to plan for and accommodate housing at all income levels . This means providing housing types affordable to different income levels beyond just single-family housing.
<b>7; 8; 9; 10; 11; 13; 14; 15; 16; 18; 19; 20; 22; 23; 25; 26; 27; 32; 33; 35; 37;</b>	Implementation	Climate Resilience; Environment	Suggestion to develop an Environmental Advisory Board (EAB)	Skagit County is looking at the best options for the community to provide input on environmental and climate issues. We will continue to update the community as we work through this process.

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39; 40; 42; 45; 46; 48; 49; 50; 51; 52; 56; 58; 59; 60; 62; 64; 65; 66; 69; 73				
11; 21; 24; 48	Policy	Ag. Land; Environment; Climate Resilience; Transportation; Housing	Support for various amendments: Agricultural Designations Policy 4A-1.1(e); Critical Areas. Goal 5B; Housing. Goal 7; Transportation. Element 8; Energy Conservation. Goal 9A-5.; Climate and Resiliency. Element 12	Multiple comments expressed support for elements or specific comment.
11	Policy	Economic Development	Comment recommends the addition of a policy promoting a transition from high carbon intensity industries.	<p>As part of the periodic update, the County completed stakeholder interviews with economic development groups in Skagit County but did not perform a comprehensive survey across multiple industries that may be impacted by a policy to transition from high carbon industries. Further engagement should be completed as part of developing this this policy recommendation so it can be properly implemented over time. The policies in the current draft of the Comprehensive Plan prioritize efforts to improve transportation opportunities through projects and coordination and development patterns by reducing urban sprawl to reduce greenhouse gas emissions.</p> <p>County will consider future engagement with industries that may be impacted by transition of high carbon industries.</p>
11; 18	Policy	Transportation	Recommend addition of a policy promoting	Multiple goals in the Transportation Element have been revised to emphasize multimodal transportation. Multimodal includes walking and biking transportation, in addition to transit.

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			increased nonmotorized transportation to support the goal of reduced VMT.	Expansion of multimodal transportation opportunities is a strategy Skagit County is implementing as part of the state goal of reducing vehicle miles traveled which will contribute to a decrease in greenhouse gas emissions. Promotion of multimodal transportation to support the reduction of vehicle miles-traveled is identified in the Version 2.0 document under policy 8B-1.3.
11; 65	Policy	Housing	Concerns regarding allowing accessory dwelling units in rural areas.	Under Skagit County Code <a href="#">SCC 14.16.710 Accessory Uses</a> , ADUs are currently allowed for any existing single-family dwelling that can meet the code requirements. Skagit County is required to provide 501 housing units that are affordable to households earning 51% to 80% of the area median income. Under guidance provided the department of Commerce allowing accessory dwelling units can improve affordability especially for lower area median income households. ADUs are part of the Comprehensive Plan’s revised housing affordability strategy to ensure consistency with recent changes to RCW 36.70A.070 that were passed under HB 1220 (2021).
11; 41; 46	Policy	Environment	Suggested strikethrough and revisions to Goal 5A; Policy 5A-5.1; 5A-5.1(a)(iii); Policy 5A-5.4(b); and 5A-5.4(d). The comments express concern over removing language that says “prevent continued loss and degradation” and replace with “no net loss of wetland functions and values”	The recommendations to policies in the Environment Element were drafted to be consistent with guidance provided from the Department of Ecology as they relate to critical areas ordinances, comprehensive planning, and shoreline management. The three documents: the County Comprehensive Plan, Shoreline Management Plan, and Critical Areas Ordinance are required to be consistent and follow best available science and other guidance and regulations enforced with the Department of Ecology.
12; 69	Code Amendment	Implementation	Suggested revisions to SCC 14.16.830 Landscaping requirements, “display	This is encouraged in the development regulations. The definition of horticulture includes fruit and vegetable gardening and many zones in Skagit County also allow agriculture.

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			gardens” to include edible plants such as vegetables and fruits, “urban vegetable gardens”	
18	UGA	Land Use	Stronger language and limitations on Anacortes UGA, not to expand boundaries and focus on infill. Oppose Section 2.8	The proposed Anacortes UGA expansion is not being proposed to accommodate population, housing or employment growth and is being proposed to add to Anacortes Community Forest land and will be designated Parks by the City of Anacortes. The majority of the 9 parcels included are currently being used for recreational purposes and will continue to be used for recreational purposes. The majority of the parcels proposed in the UGA expansion have conservation easements.
18	Policy	Rural	Opposition to Countywide Planning Policy 2.6	Population allocations are established through the Countywide Planning Policies (CPPs) which were amended by the Board of County Commissioners on March 25, 2025. Policy 2.6 is a CPP that is currently referenced in the Comprehensive Plan. The Planning and Development Services Department is recommending eliminating all of the repeated CPPs throughout the comprehensive plan as the CPPs are linked on Page 5 of the document and are subject to change. This will create a more readable document.
18	Policy	Rural	Opposition to Policy 3C-1.6(b) – wrong place for affordable housing	Skagit County is required to provide 501 housing units over the next 20-years to individuals who earn between 51-80% of the area median income (AMI). Housing at 51-80% of the AMI would not include single-family detached housing, which is more expensive. Housing types, such as manufactured homes, tiny homes, duplexes, or triplexes. To address this issue, the county is considering the allowance of gentle density in some Limited Areas of More Intense Rural Developments (LAMIRD) where the growth would be consistent with the requirements in RCW 36.70A>070(5).

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				<p>It is important to note that Skagit County is utilizing the <u>Housing for All Planning Tool (HAPT)</u>, Method C for housing. Method C does not include any allocation of housing growth at 0-50% AMI, which would result in multi-family housing. Allocation Method A and B would have allocated 0-50% AMI housing to rural areas. This would be inconsistent with rural character and require urban services, which are not allowed in rural areas.</p> <p>This housing allocation was reviewed through the Skagit Council of Governments and approved in the Countywide Planning Policies by the Board of County Commissioners in March, 2025. Single-family housing types in rural areas outside of LAMIRDS are not affordable to households earning less than 80% of the area median income. The increase in density proposed is intended to provide options for housing types affordable to the appropriate area median income level and satisfy GMA requirements mandated under RCW 36.70A.070 approved as part of HB 1220 (2021). The adjustments to densities in LAMRIDS are consistent with requirements in RCW 36.70A.070(5) to ensure new housing is supported by capital facilities and services and to maintain rural character. Gentle density revisions follow updated GMA requirements in order to meet new housing requirements.</p> <p>Lastly, as part of community engagement, the need to provide options for more affordable housing types for people who live and work in rural areas was strongly expressed. This includes housing so people who work in rural areas can live closer to where they work. More affordable housing types can also allow someone to downsize their home while staying in the community.</p>



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18; 39; 49	Policy	Transportation	Revise to require safe underpass and/or overpasses for safe crossings for fish and wildlife, strengthening Goal 5A	Underpasses and overpasses are mostly needed on state highways, which are Washington Department of Transportation rights-of-way.  Skagit Council of Governments Transportation Policy Board coordinates with WSDOT that provides funding and management of state roadways.
18; 24; 49; 55; 60	Policy	Environment	Floodplain/ Floodway and flood insurance. Revise for impacts to sea level rises and increased flooding focused on Skagit and Samish Rivers.	The new Climate Element proposes several new policies that the County will start to implement to increase prevention and protection against flooding and sea-level rise. The County will continue to review available data to further understand potential impacts of flooding and sea-level rise on vulnerable populations and along rivers.
24; 46; 51	Policy	Climate Resilience	Suggested additions, revisions, or clarifications to 12 J 1.1; 12 J 1.4; 12 J 1.7 and 12 J 1.8. Suggestions include elevating partially damaged structures out of floodplains, use stronger verbs than “assess” and “collaborate”, and to use projections of sea-level rise for the lifetime of a development or facility.	The current draft of resilience policies to address flooding and sea-level rise (identified as 12 J is the current draft Comprehensive Plan) have been proposed to initiate actions for Skagit County to work toward prevention and protection from impacts and especially impacts of flooding and sea-level rise to vulnerable populations. However, Skagit County wishes to continue review of available data beyond the adoption of this first draft of the Climate Element and continue collaborating with stakeholders between periodic updates to refine actions that can then be implemented in development regulations, as some of these comments have suggested. To establish the policies in the current draft, Skagit County used available statewide datasets recommended by the Department of Commerce for initial review of impacts and risk from climate hazards and vulnerability. This provided a high-level assessment to provide a baseline of policies to work from but will be refined as more detailed data is reviewed with stakeholders and the populations most impacted.

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25	Policy	Housing	Suggest emphasizing first time home buyers and continue to support Latin X population.	The Housing Element is supporting housing opportunities for first time home-buyers and the Latin X community by expanding opportunities for affordable housing by the provision of multiple housing types that may be affordable to more than one income band and also by seeking programs to support in subsidized housing and other housing programs. The current draft of the Comprehensive Plan does prioritize locating new affordable housing opportunities in cities, where urban governmental services are provided where greater employment opportunities are provided, and where transportation costs will be lower. See the Housing Element Goal 7A.
28; 64	Goals	Natural Resource Lands	Revise goal 4A-2 to mention Farmland Legacy Program as managed by Conservation Futures Advisory Committee.	Skagit County staff is considering these comments and will include a recommendation to the Planning Commission.
29	Ag. Land	Natural Resource Lands; Rural	Cite RCW 36.70A.050 or RCW 36.70A170 relative to conserving “prime agricultural soils”	Skagit County will review changes to ensure consistency between the Comprehensive Plan and RCW and WAC.
29	Policy	Natural Resource Lands	Policy 4A-1.1 (e) suggested to be stronger	Skagit County will review natural resource lands policies to ensure consistency with WAC and RCW as they relate to natural resource land designations and de-designations. Designation and de-designation analyses generally follow procedures established in WAC 365-190.
30; 31; 34	Employment Capacity	Economic Development	Concern of inadequate sized, developable, and available industrial parcels within the UGAs. Re-evaluate employment capacity of Bayview Ridge UGA and subarea. Specific amendments and adjustments are suggested in each letter.	Skagit County may consider review of the Bayview Urban Growth Area as part of a separate planning process after completion of the comprehensive plan periodic update.

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32; 46	Policy	Climate Resilience	Medium priority/support for renewable energy in Policy 9A-5.3 and 9A 5.7 and Policy 12G-1.3 EV Infrastructure should be a high priority	To continue to emphasize EV infrastructure Skagit County is implementing options for EV charging stations and other EV infrastructure opportunities in the development regulations as part of the periodic update. Draft development regulations will be released to the public in the next couple of months. Separate opportunities to comment on the draft regulations will be provided.
32; 35; 39; 41	Data; Outreach	Environment; Climate Resilience	Concern over public engagement, tribal consultation, and lack of scientific data to back up the comprehensive plan. Suggestion to incorporate Skagit Climate Consortium new model (when released) “Draft Plan lacks enforceability, scientific rigor, and regulatory alignment to ensure these resiliency goals are effectively achieved.”	This is the first time Skagit County is adopting a Climate and Resiliency Element as part of the Comprehensive Plan per new state requirements in RCW 36.70A.070. The Climate Element will continue to be adapted over time. To complete the first draft of the Climate Element, resiliency subelement, and greenhouse gas emissions reductions subelement, Skagit County and the consultant utilized statewide datasets and data sources recommended by the Department of Commerce to ensure consistency with the new state laws in RCW 36.70A.070. State law requires these elements to analyze impacts from climate hazards and mitigate risks to lives and property, reduced greenhouse gas emissions, reduce vehicle miles traveled, and protect overburdened or vulnerable communities. Skagit County will continue to work with stakeholders to analyze current data to understand the impacts to vulnerable populations from climate change or hazards exacerbated and work with those impacted to develop actions for continued preservation or protection.
35	Multi-modal	Transportation	Engage with organizations including Burlington Bicycle Coalition; coordinate with cities to improve bike and pedestrian connections	Skagit County has revised the transportation policies to emphasize new opportunities for walking and biking infrastructure and other programs but will continue to review policies to further provide biking and walking to align with transportation requirements and reduce vehicle miles traveled.

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36; 61	Policy	Natural Resource Lands	Policy revisions and strike throughs for Natural Resource Lands Policy 4A-1.1 (e ) and 4A-3.1; Policy 4A-4.6; Policy 4A-5.5.	Skagit County staff is considering these comments and will include a recommendation to the Planning Commission.
36; 46; 61	Policy	Utilities	Policy revisions and strike throughs for Utilities Policy 9A-8.9; Policy 9B-1.6; Policy 9B-1.7 Revisions suggest added language to address “irrigation water needs”, ensuring changes to dikes and levees are consistent with flood protection and drainage functions “defined by diking and drainage districts”, and removing 9B-1.7. See comment for details.	Any reference in the Comprehensive Plan that establishes no net loss of fish populations or habitat is meant to be consistent with implementation of critical areas ordinance and the Shoreline Master Program and follow guidance provided by the Department of Ecology. This language ensure consistency between the three documents which is required under the Growth Management Act which requires that Comprehensive Plans be consistent with development regulations 36.70A.040, the definition of development regulations includes Critical Areas Ordinance and Shoreline Master Programs 36.70A.030(13).
37	Policy	Climate Resilience	Climate resiliency goals, policies and strategies should not conflict with federal, state, and regional when considering future development	The scientific data used for the vulnerability assessment and other climate related research, like the greenhouse gas emissions (GHG) inventory report, was based on the direct guidance provided from the Washington State Department of Commerce, consistent with Growth Management Act requirements. The Department of Commerce strongly encouraged all jurisdictions to use the provided statewide datasets and resources. Since this is the first time Skagit County is endeavoring to adopt policies related to climate, resilience, and GHG, the analysis was based on the state recommended data sources. For future periodic updates, Skagit County will continue to work with stakeholders to address concerns related to data used for Comprehensive Plan analyses.

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39; 48; 76	Policy	Natural Resource Lands	Wildfire Resiliency Strategy revisions to 4B-2.12	Skagit County staff is considering these comments and will include a recommendation to the Planning Commission.
39	Policy	Natural Resource Lands	Rewording Policy 4B-5.5 for compatibility for industrial forest zoning.	Skagit County staff is considering these comments and will include a recommendation to the Planning Commission.
39; 41	Policy; Critical Areas	Environment	Stronger wording to Goal 5A and Policy 5A-5.1 for no net loss of wetland functions and values. Fails to integrate Best Available Science (BAS)	A best available science review was completed as part of this comprehensive plan update and revisions to the Comprehensive Plan were completed and are being reviewed against the draft critical areas ordinance to ensure consistency between the two documents. Skagit County has been working closely with the Department of Ecology to ensure that regulations relating to the protection of critical areas including vital wetlands functions are being adhered to as the County continues the periodic update of the Comprehensive Plan. The draft critical areas ordinance and accompanying documents will be available to the public for review in the next few months and opportunities to provide comments through a separate hearing process will be provided.
41	History	Appendix B	“Linking Past to the Present” includes a grossly inaccurate portrayal of tribal presence and stewardship in Skagit Valley prior to colonization.	Skagit County staff is considering these comments and will include a recommendation to the Planning Commission.
41	Ag. Lands	Natural Resource Lands; Environment	Opposition to Additional Water Rights for Agriculture: Policy 12A-1.6	Skagit County’s Comprehensive Plan seeks to protect and preserve the Skagit’s natural productivity, balancing and sustaining both agriculture and the fisheries resource. While we oppose water resource policies likely to increase new out-of-basin transfers or rural residential growth, Skagit agriculture requires a reasonable Skagit mainstem water right to support its long-term viability in the face of a warming climate and growing regional population. Skagit County is equally insistent that

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				access to mainstem irrigation water for Skagit agriculture must not adversely impact Treaty-protected resources. This must be guided by best available science. To this end, Skagit County supports the work of the Joint Legislative Water Task Force, and will be guided by the forthcoming water resource study prepared under the auspices of the Washington Academy of Sciences.
41	Implementation	Climate Resilience; Environment	Call for policies on Mitigation Monitoring and Accountability	Skagit County is starting to implement methods for continued monitoring and tracking of comprehensive plan policies. The implementation chapter has been revised to identify key policies that should move forward before the next periodic update to help plan for correct allocation of staff time, funding, and other resources, and ensure alignment with the community’s vision captured during the periodic update. Skagit County will continue to refine methods for monitoring and tracking such as improved use of GIS technology, permitting, and other land use data. These are represented in policies throughout the Comprehensive Plan. Skagit County is continuing for monitoring growth, transportation, economic development, and now climate and resilience at a regional level with SCOG, cities, and other organizations.
41	Critical Areas	Climate Resilience	Treaty Rights and Cultural Considerations: explicitly integrate the tribes treaty-protected fishing rights into climate and planning framework	Skagit County will consider this comment. Regardless, all comments will be forwarded to the Planning Commission for consideration.
41; 55; 59	Policy	Climate Resilience	Recommended revisions to CE 1.1: Farmland Conservation and Habitat Restoration Conflicts; CE 1.4; CE 1.6: Integrated Strategic Investment	Skagit County will consider this comment. Regardless, all comments will be forwarded to the Planning Commission for consideration.

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			Plan; CE 9.4: Water Resources; CE 10.3: Restrict Development in Flood-Prone Areas with Best Available Climate Science; CE 10.4: Shoreline Stabilization with Science-Based Justification. Add Policy CE 9.5 Climate Resilience; Drought; Agriculture.	
46	Climate	Climate Resilience	Add “Beaches and estuarine wetlands” to vulnerable climate hazards	Skagit County will consider this comment. Regardless, all comments will be forwarded to the Planning Commission for consideration.
46	Implementation	Climate Resilience	Utilize incentives such as Transfer of Development Rights (TDR) to relocate shoreline residents at risk	The County is preserving the existing Goal 5A-3 which states to Utilize economic incentives, such as density credit transfers, transfer of development rights, tax incentives, cluster housing, conservation easements, and public benefit rating systems, as appropriate, to encourage citizens to conserve, protect and restore critical areas. During the planning period Skagit County will continue to assess the feasibility of such programs for implementation and recognizes their importance in the current draft as they relate to climate and resilience and shoreline protection.
47	Mineral Overlay	Natural Resource Lands	Mineral Resource Overlay (MRO) overlay is a good thing but needs to have an education component.	Skagit County will consider this comment. Regardless, all comments will be forwarded to the Planning Commission for consideration.
48	Policy	Rural	Goal 3B, policy on limited areas of service is not defined. Suggest removing policy.	Skagit County is required to provide 501 housing units over the next 20-years to individuals who earn between 51-80% of the area median income (AMI). Housing at 51-80% of the AMI would not include single-family detached housing, which is more expensive. Housing types, such as manufactured homes, tiny

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				<p>homes, duplexes, or triplexes. To address this issue, the county is considering the allowance of gentle density in some Limited Areas of More Intense Rural Developments (LAMIRD) where the growth would be consistent with the requirements in RCW 36.70A.070(5).</p> <p>It is important to note that Skagit County is utilizing the <u>Housing for All Planning Tool (HAPT)</u>, Method C for housing. Method C does not include any allocation of housing growth at 0-50% AMI, which would result in multi-family housing. Allocation Method A and B would have allocated 0-50% AMI housing to rural areas. This would be inconsistent with rural character and require urban services, which are not allowed in rural areas.</p> <p>This housing allocation was reviewed through the Skagit Council of Governments and approved in the Countywide Planning Policies by the Board of County Commissioners in March, 2025. Single-family housing types in rural areas outside of LAMIRDs are not affordable to households earning less than 80% of the area median income. The increase in density proposed is intended to provide options for housing types affordable to the appropriate area median income level and satisfy GMA requirements mandated under RCW 36.70A.070 approved as part of HB 1220 (2021). The adjustments to densities in LAMIRDs are consistent with requirements in RCW 36.70A.070(5) to ensure new housing is supported by capital facilities and services and to maintain rural character. Gentle density revisions follow updated GMA requirements in order to meet new housing requirements.</p> <p>Lastly, as part of community engagement, the need to provide options for more affordable housing types for people who live</p>



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				and work in rural areas was strongly expressed. This includes housing so people who work in rural areas can live closer to where they work. More affordable housing types can also allow someone to downsize their home while staying in the community.
49; 55	Policy	Rural	Suggested revisions to 3A, delete 3A-B	Skagit County will consider this comment. Regardless, all comments will be forwarded to the Planning Commission for consideration.
51	Open Space	Transportation	Request to revise the Skagit County UGA Open Space Plan.	While revising the open space concept plan was not included in the scope of the Comprehensive Plan Periodic Update Skagit County has proposed several revisions to policies in the Transportation Element that emphasize the need to expand opportunities for biking and pedestrian facilities to improve quality of life and reduce vehicle miles traveled. Helping to address the comments concern for the provision of safe multi-use trails. Skagit County will continue to implement methods to achieve these goals during the planning period until the next periodic update.
51	Language	Environment	Address language in policy 5A-5.1. Previous version used “shall” and revised version uses “should” the County should use “shall” as it suggest stronger emphasis.	Many of the verbs used in the Comprehensive Plan were proposed to be revised and the word “shall” was proposed to be removed because as defined under state law RCW 36.70A.030(8) "Comprehensive land use plan," "comprehensive plan," or "plan" means a <b><i>generalized coordinated land use policy statement</i></b> of the governing body of a county or city that is adopted pursuant to this chapter [RCW]. A jurisdictions Comprehensive Plan establishes 20-year plans to articulate a community vision through a series of goals, objectives, policies, and actions that guide the day-to-day decisions of elected officials and local government staff. Development regulations are. (13) "Development regulations" or "regulation" <b><i>means the controls placed on development or land use activities by a county or city, including</i></b> , but not limited to, zoning ordinances,

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				critical areas ordinances, shoreline master programs, official controls, planned unit development ordinances, subdivision ordinances, and binding site plan ordinances together with any amendments thereto.
51	Protection	Natural Resource Lands	Seek other incentives to provide affordable housing like Transfer of Development rights programs to protect rural and environmentally sensitive areas from development.	The County is preserving the existing Goal 5A-3 which states to Utilize economic incentives, such as density credit transfers, transfer of development rights, tax incentives, cluster housing, conservation easements, and public benefit rating systems, as appropriate, to encourage citizens to conserve, protect and restore critical areas. During the planning period Skagit County will continue to assess the feasibility of such programs for implementation and recognizes their importance in the current draft as they relate to preservation of natural resources lands and provide for housing.
51	Electric Vehicles	Transportation	Suggest adding a policy supporting the expansion of electrical vehicle charging infrastructure throughout Skagit County.	Skagit County is seeking expansion of electric vehicle infrastructure through multiple policies including 8L-1.7 and 8N-1.11, and 12G-1.5. Skagit County is incorporating expansion for electric vehicles in development regulations. Draft development regulations will be released to the public in a couple of months.
51; 70; 74; 76	Language	Natural Resource Lands	Call for restoring the natural resource lands changes to the original language.	Skagit County staff is considering these comments and will include a recommendation to the Planning Commission.
51; 71	Legacy Program	Urban, Open Space	Call for altered language for Policy 2G-1.1, see recommendation in the comment.	Skagit County will consider this comment. Regardless, all comments will be forwarded to the Planning Commission for consideration.
51	Agriculture	Natural Resource Lands	Concern about the term “Commercially Significant”	The term “Commercially Significant” is a state established definition and commonly used in natural resource land comprehensive planning. RCW 36.70A.030 (23) "Long-term commercial significance" includes the growing capacity, productivity, and soil composition of the land for long-term

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				commercial production, in consideration with the land's proximity to population areas, and the possibility of more intense uses of the land.
51	Agriculture	Natural Resource Lands	Restore reference to the Farmland Legacy Program and Conservation Futures Advisory Committee. See comment for specific language suggestions.	Skagit County staff is considering these comments and will include a recommendation to the Planning Commission.
53	Policy	Transportation; Capital Facilities	Concern with References and policy integration around the Guemes Island Ferry.	Skagit County will consider this comment. Regardless, all comments will be forwarded to the Planning Commission for consideration.
54; 59	Policy	Natural Resource Lands;	Specific recommendations to agricultural and farmland protections from Western Washington Agricultural Association (WWAA)	Skagit County will be reviewing natural resource lands policies.
55	Policy	Shoreline	Encourage new development be situated to avoid needing shoreline stabilization	Skagit County will continue to review data and understand impacts of proposed policy recommendations related to shoreline stabilization. <a href="#">However, all new development is required to meet Skagit County Code, -including the Shoreline Master Program and Critical Areas Ordinance. Where applicable, new developments are also required to meet state and federal environmental requirements.</a>
57	Goals; Policy	Environment	Specific goals around restoring native trees and plants, particularly in our UGAs, and replacing lawns with native meadows that will restore pollinator and wildlife habitat in	Skagit County currently does not provide detailed development regulations around UGAs and relies on city's development regulations

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			neighborhoods and on city/county land. LID techniques.	
<b>57; 58; 59</b>	Goals; Policy	Transportation	Education on reducing motorists, SUVs, consider commuter rail, do not widen roads. Go further with active transportation.	<p>Multiple goals in the Transportation Element have been revised to emphasize multimodal transportation. Multimodal includes walking and biking transportation, in addition to transit.</p> <p>Expansion of multimodal transportation opportunities is a strategy Skagit County is implementing as part of the state goal of reducing vehicle miles traveled which will contribute to a decrease in greenhouse gas emissions. Promotion of multimodal transportation to support the reduction of vehicle miles-traveled is identified in the Version 2.0 document in policy 8B-1.3.</p>
<b>63</b>	Correction	Economic Development	policy 11A-1.5 (p. 376) and 11D-1.9 (p. 382), the draft erroneously refers to the Economic Development Association of Skagit County. Several years ago, the organization changed its name to the Economic Development Alliance of Skagit County.	Will be corrected.
<b>64</b>	Rural	All Elements	Concern on emphasis shift from rural to urban	<p>For this periodic update, the only urban growth area boundary change is proposed is part of the Anacortes UGA. Anacortes applied for the urban growth area boundary explaining to incorporate parcels that are currently used as park space and under administration of the City of Anacortes.</p> <p>No other changes to land use designations or land use designation boundaries are being proposed as part of this periodic update.</p>

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64	GMA	All Elements	Consider rulings of Western WA Growth Management Hearings Board (now GMHB) in the guidelines.	The Comprehensive Plan is prepared consistent with Growth Management Act requirements for the periodic update and relevant case law.
64	Usability	All Elements	References to WACs, RCWs, maps, reference documents, and overall read of the lengthy plan is difficult to navigate	This periodic update was focused on addressing the large breadth of changes to state law that impacted the County.
65	SRT Zone	Rural	Policy 3C-4.4 needs to account for water availability.	Skagit County development regulations require the provision was water availability for development. See concurrency requirements under SCC 14.28.
65	Wildfire	Natural Resource Lands	Add to Policy 4B-2.12 “This includes developing evacuation plans and routes”	Due to the unpredictability of wildfires, it is challenging to develop set routes for evacuation. Department of Emergency Management is developing evacuation zones for wildfire hazards and is performing bi-annual review of potential evacuation routes.
65	Ferry	Transportation	Call for establishment of citizen advisory committee for Guemes Island Ferry	Skagit County is not considering the creation of a citizen advisory committee at this point. Skagit County would like to further consider the goals and implementation and coordination with such a committee before incorporating a new committee into policy.
65	Rainwater Capture	Climate	Call for implementing a template system to turn rainwater into potable water.	Skagit County Public Health is working to provide more resources for applicants that are interested in using rainwater catchment as a potable water source for single-family residences.
65	Shoreline Development	Climate	Call for no moving shoreline development so no shoreline stabilization is required.	The current draft policies in the Climate Element emphasize the goal of reducing the need or additional measures of shoreline stabilization. Skagit County will continue to explore methods during the planning period that can be implemented to reduce this concern.

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67	Committee	Climate	Calls for a climate advisory board.	Skagit County is looking at the best options for the community to provide input on environmental and climate issues. We will continue to update the community as we work through this process.
67	Parks	Urban, Open Space	Policy 2A-3.1 UGAs should include additional space for City Parks to accommodate increased leisure.	The Capital Facilities Element is required to consider the provision of adequate facilities and services and is required to provide facilities and services concurrently with growth. As population increase and park needs change urban growth areas will be required to accommodate and provide adequate levels of services for parks.
67	Growth	Urban, Open Space	Policy 2A-3.5 regarding siting fully-contained communities in a rural area, language should conform to RCW 36.70A.350.	Skagit County is required to comply with all applicable state laws under the Growth Management Act including RCW 36.70A.350.
67	Landscaping	Urban, Open Space	Calls for the inclusion of landscaping, including trees in Goal 2A 6	In the Urban, Open Space sections Skagit County relies on Cities and their development regulations for establishing standards for landscaping in urban growth areas.
67	Low-income housing	Housing	Call for incentivized and subsidized low-income housing to improve affordability.	Skagit County has revised the housing affordability goals and policies to include close coordination with agencies and cities to seek further incentives and subsidized housing options for residents. The policies consider several avenues to explore and emphasize that these housing options should be done in collaboration with cities to provide affordable housing types for low-income families in areas with adequate services and facilities and near areas of employment which can also contribute to reduction of vehicle miles traveled.
67	Energy	Utilities	Call for planning for energy storage and battery storage facilities.	Skagit County is planning to conduct a countywide analysis of potential areas to site clean energy projects and develop new regulations for clean energy generation and storage projects.
67	Climate Hazards	Rural	No mention of flooding and sea-level rise in the rural element.	The new climate establishes goals and policies to address natural hazards exacerbated by climate change and the goals and policies in the climate element and resilience subelement

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				are intended to be applied in both urban and rural areas other anywhere that may be impacted by natural hazards exacerbated by climate change. The environment element does include new or revised policies to include flooding and sea-level rise as policies in this element already addressed flooding from the context of water, habitat, and wetland preservation. The Climate and Resilience subelement include the additional perspective of protecting residence and property and especially those particularly vulnerable or at greater risk to some natural hazards.
67	Landscaping	Rural	Calls for the inclusion of landscaping, including trees in Goal 3B	All commercial development is required to comply with the landscaping requirements established in SCC 14.16.830.
67	Flooding	Environment	Call for increased restrictions around flooded areas and prohibiting development near floodplains, increasing buffers, and establishing enforcement protocols.	Current draft policies establish the importance of floodplain mitigation and protection vulnerable populations to floods. Skagit County will continue to review relevant data with stakeholders to establish reasonable actions that can be taken to implement these policies over the planning period.
67	ADU	Housing	Prohibit short-term rentals if ADUs are meant for affordable housing.	Skagit County staff is considering these comments, all comments regardless will be forwarded to the Planning Commission.
67	Shorelines	Climate	Incorporate climate and shoreline protection in other elements.	The new climate establishes goals and policies to address natural hazards exacerbated by climate change and the goals and policies in the climate element and resilience subelement are intended to be applied in both urban and rural areas other anywhere that may be impacted by natural hazards exacerbated by climate change. The environment element does include new or revised policies to include shoreline protection from the context of water, habitat, and wetland preservation. The Climate and Resilience subelement include the additional perspective of protecting residence and property and especially those particularly vulnerable or at greater risk to some natural hazards.

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67	Monitoring	Implementation	Call for greater implementation and tracking of policies.	Skagit County is starting to implement methods for continued monitoring and tracking of comprehensive plan policies. The implementation chapter has been revised to identify key policies that should move forward before the next periodic update to help plan for correct allocation of staff time, funding, and other resources, and ensure alignment with the community’s vision captured during the periodic update. Skagit County will continue to refine methods for monitoring and tracking such as improved use of GIS technology, permitting, and other land use data. These are represented in policies throughout the Comprehensive Plan.
68	Vulnerability Assessment	Climate	Call for identification of specific scientific documents for the Vulnerability Assessment. Documents are identified in the comment.	The scientific data used for the vulnerability assessment and other climate related research, like the greenhouse gas emissions (GHG) inventory report, was used based on the direct guidance provided from the Department of Commerce. The Department of Commerce strongly encouraged all jurisdictions to use the provided statewide datasets and resources. Since this is the first time Skagit County is endeavoring to adopt policies related to climate, resilience, and GHG, the analysis was based on the state recommended data sources. For future periodic updates, Skagit County will continue to work with stakeholders to address concerns related to data used for Comprehensive Plan analyses.
69	Gardens	Urban, Open Space	Call for zoning encourage vegetable and fruit gardens.	The definition of horticulture includes fruit and vegetable gardening and many zones in Skagit County also allow agriculture. This is encouraged through current development regulations.
72	Frontline Communities	Climate	Add additional context for what will be done to frontline communities in Policy 12E-1.2	For the new Climate Element and resiliency subelement, Skagit County used statewide datasets and other data recommended by the Department of Commerce to complete preliminary analysis of potential vulnerability and risk of populations from specific hazards. This helped establish baseline policies for



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				Skagit County to continue working on until the next periodic update. Skagit County will continue to seek the full extent of impacts to frontline communities in order to establish reliable actions for protections from hazards moving forward.
72	Fuels	Climate	Call for striking policy 12F-1.5 bio-blend fuels.	Skagit County will consider this comment. Regardless, all comments will be forwarded to the Planning Commission for consideration.
72	Monitoring	Climate	Call for establishing metrics and timeline for measuring resilience.	Skagit County is starting to implement methods for continued monitoring and tracking of comprehensive plan policies. The implementation chapter has been revised to identify key policies that should move forward before the next periodic update to help plan for correct allocation of staff time, funding, and other resources, and ensure alignment with the community’s vision captured during the periodic update. Skagit County will continue to refine methods for monitoring and tracking such as improved use of GIS technology, permitting, and other land use data. These are represented in policies throughout the Comprehensive Plan.
72	Correction	Climate	Confusion Page 398 County’s role to reduce overtime.	The sentence is referring to the County’s role to reduce emissions overtime, the subject is established in the lines above.
75	Agriculture	Natural Resource Lands	Call to revise policy 4A-4.2 to improve viability of businesses that support agricultural industries by removing nuisance language.	Skagit County will consider this comment. Regardless, all comments will be forwarded to the Planning Commission for consideration.
76	Growth	Urban, Open Space	Call for reducing the growth allocation to Skagit County from 20% to 10% in rural areas.	Skagit County is proposing several new policies in the Land Use Element to work toward collaborating with Cities and SCOG to refine the growth allocations established in the Countywide Planning Policies to better providing housing options in urban areas where existing services can be provided at a lower cost

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				<p>which can contribute to affordable housing for Skagit County residents.</p> <p>Skagit County is required to ensure the Comprehensive Plan is consistent with Countywide Planning Policies. The Countywide Planning Policies dictate the growth allocations of population for each jurisdiction in Skagit County and as of 2024 allocate housing for each jurisdiction and breakdown housing for each jurisdiction by income bracket. Under the current Countywide Planning Policies Skagit County is required to provide 501 housing affordable to households earning less than 80% of the area median income.</p>
76	Language	Natural Resource Lands	Adjust policy language from “should” to “may” consistent with WAC for Policy 4A-1.1.	Skagit County will consider changes to align with WAC.
76	Housing	Rural	Concern regarding goal 3A-2 to providing a “variety of housing types” in rural areas.	Skagit County is required to provide housing for households earning between 51% to 120% of the area median income. This comes from recent changes to RCW 36.70A.070 which requires all jurisdictions to plan for and accommodate housing at all income levels. This means providing multiple housing types as single-family housing is not affordable to households earning less than 100% of the area median income. This state law change comes from HB 1220 (2021).
76			Concern regarding the strength of current greenhouse gas (GHG) emissions reductions in helping to achieve the State’s overall target of net-zero emissions by 2050.	<p>Skagit County is taking actions to reduce greenhouse gas emissions that are within Skagit County’s authority. The current comprehensive plan draft prioritizes the following methods to reduce GHG emissions by 2050:</p> <ol style="list-style-type: none"> <li>1. Focus density in urban areas by coordinating with cities to allocate growth (except for Skagit County housing allocation required under state law).</li> <li>2. Increase walking and biking opportunities throughout the county to reduce vehicle miles traveled. Coordinate with transit agencies to improve transit options.</li> </ol>

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				<ol style="list-style-type: none"><li>3. Improve access to EV facilities.</li><li>4. Encourage the transition of building energies and facilities to alternative sources.</li><li>5. Transition County facilities to electric.</li></ol>