

TO: Jack Moore, Planning and Development Services  
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FROM: Erin O'Kelley,  
Clay White, Director of Planning

DATE: May 29, 2025

RE: 2025 Periodic Comprehensive Plan Update – Draft Comprehensive Plan staff report

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## PLANNING COMMISSION RECOMMENDATION

On April 15, 2025, the Planning Commission met at their regularly scheduled meeting after a series of hearings and deliberations and a 30-day public comment period. The Planning Commission recommended that the Board of County Commissioners adopt the 2025 Periodic Comprehensive Plan Update with a series of recommendations in addition to the recommendations provided by Skagit County staff.

**Attachment A** to this memo is the Planning Commission recommended motion and findings of fact.

In addition to the recommendations provided by staff, the Planning Commission made six additional recommendations summarized below:

- Changes to the natural resource policies to address comments from the Forest Advisory Committee, define language related to Wildland Urban Interface, and reduce requirements for designations of agricultural natural resource lands.
- Revise the values and vision section of the Comprehensive Plan.
- Adjust the Swinomish UGA zoning language.
- Revise policies in the Utilities Element regarding conversion of energy resources from gas to electric sources.
- Revise policy 12J-1.1 to include an in-depth analysis and stakeholder engagement.

The Planning Commission expressed support for the policies 2A-8.5 and 2A-8.7 encouraging increasing density allowed in the unincorporated urban growth areas. The Planning Commission also recommended approving the Anacortes Urban Growth Area expansion.

## PUBLIC COMMENT RECEIVED

On March 11, 2025, the Skagit County Planning Commission held an open record public hearing on the 2025 Periodic Comprehensive Plan update. After receiving oral testimony at the hearing, the Planning Commission closed the record for further oral comments and continued the public hearing to April 8, 2025. The continued public hearing focused on Planning Commission deliberations and recommendations to the Skagit County Board of County Commissioners. In addition to receiving oral testimony at the March 11 hearing, Skagit County accepted written testimony from February 13 to March 13, 2025, on the Draft Comprehensive Plan. Through March 13, 76 individual comments were received.

**Attachment B** to this memo is high level summary of public comments which:

- Categorizes written comments
- Correlates the comments to specific comprehensive plan elements, where applicable
- Summarizes specific comments
- Provides a high-level response, where appropriate

The summary also lists the “Comment #” in the left-hand column. **Attachment C** includes copies of the letters received. Each comment letter is labeled so you can connect comments letters with the public comment summary table. It is important to note that the summary table is not intended to provide a response to each comment within each written comment received. It is intended to assist the Planning Commission as you review comments received and deliberate on the Draft Comprehensive Plan.

## RECOMMENDATIONS BY STAFF

Based on the public comments received during the public hearing process Skagit County staff compiled a list of recommendations to address public comments. The recommendations from staff were provided to the Planning Commission during their deliberation meetings in April.

**Attachment D** to this memo is the copy of Skagit County staff recommendations that were provided to the Planning Commission.

Between the March and April Planning Commission meetings, Staff received comments from public agencies and the Department of Commerce as part of the 60-day review period as required under the GMA 36.70A.106. Based on the feedback provided by WSDOT and the Department of Commerce, Staff is recommending the following changes:

1. Consolidation of the Transportation Element and Technical Appendix.
  - a. Remove the existing technical appendix.
  - b. Transfer all necessary information to address state law from the Technical Appendix to the Transportation Element.
2. Revision to the rural densities in the Rural Village Residential zone, as a result of SB 5471 (2025) and to be consistent with CWPPs.
3. Added clarification that Goal 5A and associated policies can help with the mitigation of reduced snowpack identified as one of the climate exacerbated hazards in the vulnerability assessment.
4. Revisions to the Greenhouse Gas Emissions reductions sub-element explaining incremental changes to reduce GHG emissions by 2050.

## SUPPLEMENTAL DOCUMENTS

The following attachments have been submitted along with this memo:

**Attachment A** Planning Commission Recorded Motion and Findings of Fact

**Attachment B** Public Comment Summary Matrix

**Attachment C** Public Comments Submitted

**Attachment D** Staff Recommended Changes

A final PDF of the 2025 Skagit County Comprehensive Plan and appendix.

The appendix of the Comprehensive Plan contains the following reports:

- Housing Capacity Memo
- Rural Housing Capacity Analysis
- Employment Capacity of Bayview Ridge
- Housing Needs Assessment
- Vulnerability Assessment
- Greenhouse Gas Emissions Reductions Analysis

Visit: <https://skagitcounty.net/2025cpa> to read any documents associated with the project.

## PROJECT DESCRIPTION & BACKGROUND

The Washington State Growth Management Act (GMA) requires Skagit County to update its Comprehensive Plans and implementing development regulations every 10 years ([RCW 36.70A.130](#)). Comprehensive Plans are 20-year policy documents that guide and plan for growth (population and employment), housing, transportation, capital facilities and utilities, parks, recreation and open space, rural areas, and protection of natural resource lands ([RCW 36.70A.070](#)). Skagit County is required to complete the periodic comprehensive plan update by

December 30, 2025. However, the project schedule is focused on completing the project by June 30, 2025. Comprehensive Plan updates are an opportunity to revise the existing Plan to ensure consistency with state laws/case law since the last update and Best Available Science (BAS) for incorporation into critical areas regulations. This update also provides a great opportunity to balance state requirements with community vision to shape the future for Skagit County.



## POLICY REVISION METHODOLOGY

After completing the necessary data collection, analysis, and engagement, preliminary draft policies were developed. Initial policy revisions were made in accordance with the following guidelines:

- **Growth Management Act:** Consistency with the Growth Management Act (GMA) and other changes in state law.
- **Countywide Planning Policies:** Consistency with regional Countywide Planning Policies, including allocations for population, housing, and employment.
- **Public Comment:** Consistency with community vision collected through the Periodic Update engagement process established in the public participation program (adopted April 2024).
- **County Vision:** Consistency with the County's future vision collected from various departments or consistency with other County adopted plans, like the Shoreline Master Program, and Hazard Mitigation Plan, Subarea Plans, etc.
- **Administrative Cleanup:** Revisions to improve efficiency and implementation, correct errors, or updated timelines or data.

In addition, draft policy revisions contained in the Draft 2025 Periodic Comprehensive Plan Update reflect community feedback received during the release of initial draft policies in the summer of 2024.

## SUMMARY OF COMPREHENSIVE PLAN CHANGES

After completing the necessary data collection, analysis, and engagement and reviews of preliminary draft policies by Skagit County Staff and the Planning Commission the final comprehensive plan recommendations are listed below.

The proposed policy changes aim to make sure we follow state laws, simplify the language, improve accessibility, and remove unnecessary details. Here's a summary of the key changes by section/element. A complete set of proposed policy changes may be found on the Skagit County 2025 Periodic Comprehensive Plan website.

### Introduction & Summary

Overarching changes applicable to multiple elements:

- **Structure and Clarity:** The goals and policy language were simplified by cutting unnecessary details and focusing on what's most important, making it easier to understand.
- **Policy wording:** Adjustments were made to ensure consistency with WAC standards, RCWs and State guidance as appropriate, such as definitions.
- **Resiliency and Climate Planning:** A major change in this update is the addition of a focus on climate resiliency. Although there's a whole chapter dedicated to it, resiliency is included throughout the entire plan because it affects many topics.
- **Recent State Legislation:** Most elements required updates due to recent legislation including HB 1220 (Housing for all income levels); HB 1181 (Climate Resiliency, Greenhouse Gas Emission Reduction, VMT reduction, and MMLOS measures for active transportation); HB 1337 (ADUs); SB 5275 (Expanding opportunities in LAMIRDS); ESSB 5593 (UGAs).

## **Urban, Open Space, and Land Use Element**

Along with state compliance, policies have been updated to prevent the subdivision of resource lands for residential use, ensuring their preservation, while removing duplicates to align with Skagit County Code 14.18.310 for consistency.

## **Rural Element**

- **Land Use and LAMIRD (Limited Areas of More Intense Rural Development):** Revised policies to address housing within LAMIRDS, increase housing types, especially in the RVR zones, where public sewer is available. (Also applicable to Housing chapter).

## **Natural Resource Lands Element**

- **Agricultural Resource Lands:** Policy revisions align with Washington Administrative Code (WAC) sections 365-190-040, 365-190-050, and 365-190-060, adding references to agricultural resource lands and defining smaller parcels near other resource lands.  
**Natural resource lands:** Policies regarding de-designation of natural resource lands (NRL) were flagged for adjustment, suggesting that site-specific proposals be deferred until a countywide analysis is conducted.

## **Environment Element**

- **Environmental Protection and Best Practices:**
- Policies focus on preventing environmental degradation with "no net loss" for wetlands and flexibility in groundwater management based on best available science.
- **Critical Aquifer Recharge Areas (CARAs)** policies align with RCW 90.94 to protect groundwater and maintain stream flows.
- Updates prioritize wildlife corridors, flood risk management with climate considerations, compliance with the Endangered Species Act, and verification of NPDES permit compliance.
- **Collaborative Critical Areas:** Policies were revised to promote broader application across critical areas and encourage collaboration between agencies, stakeholders, and landowners for better environmental protection.

## **Shoreline Element**

No policy changes proposed.

## Housing Element

- Housing Bills: Policies are updated to comply with state laws (HB 1220, HB 1110, HB 1337) promoting housing for all income levels and middle housing/ADUs in traditionally single-family areas.
- Diverse and Affordable Housing Options: Revisions support affordable housing and diverse options for different income levels and special needs populations, with efforts to remove barriers like subjective terms.
- Equity and Impact: Racial equity analysis calls for removing qualifiers that limit equitable housing access and addressing conflicts between rural zoning and farmworker housing needs.

## Transportation Element

- Multi-modal and Active Transportation: Policies now focus on active transportation (walking, biking, mobility devices) and include active transportation, transit, and pedestrian-bike facilities in Transportation Impact Fee (TIF) projects under new GMA changes.
- Climate resiliency in transportation: Climate resiliency and GHG reduction are integrated into policies, promoting strategies like transit expansion, bus fleet electrification, and better connectivity for vulnerable [populations](#).
- GMA Compliance: Policies align with the Growth Management Act (GMA) to reduce vehicle miles traveled, improve transit accessibility, and balance transportation efficiency with public needs.
- Equity and engagement: Focus on transportation policies addressing the needs of marginalized populations and involve the community in planning.
- Growth Contributions: Policies coordinate growth with infrastructure improvements through concurrency and impact fees as appropriate, so development pays its way.
- TIB Funding: Policies include eligibility for grants like the TIB Complete Streets grant and encourage local governments to use state and federal funding for active transportation and multi-modal projects.

## Utilities Element

- Energy: Prioritizing adaptive reuse of existing buildings, Skagit's Community Energy Challenge, and financial incentives to encourage energy retrofits and renewable energy adoption.
- Waste: Solid waste management goals include composting and recycling to improve waste strategies in line with the County's Climate Action Plan.

## Capital Facilities Element

- Countywide Planning Policies (CPP): Policies ensure new developments are compatible with public facilities and aligned with countywide planning strategies.
- Time-periods: Planning period references are updated to reflect current and future development timelines.
- Compatibility: Updates to ensure compatibility between new developments and adjacent public facilities like schools.

## Economic Development Element

- Align with Comprehensive Economic Development Strategy (CEDS): Policies were updated to align with SCOG's CEDS, focusing on resiliency, growth, and industry diversification.

- Industry and Business Development: Policies encourage business growth by reducing regulatory burdens, promoting development in urban centers, and supporting marine and resource-based industries.
- Infrastructure as Economic Tool: New policies focus on improving infrastructure and addressing barriers like daycare access to support economic growth and employment opportunities.
- Tourism and Quality of Life: Policies related to tourism and community attraction were merged with Quality-of-Life strategies to enhance livability and economic opportunities.

## Climate and Resiliency Sub-Element

- Agricultural Protection and Development: Policies prioritize agricultural conservation easements to protect farmland, improve land access for new farmers, and support regenerative farming, with collaboration from the Agricultural Advisory Board, WSU Skagit County Extension Program, and local farmers.
- Disaster preparedness: Updates to include climate resilience strategies and wildfire preparedness, flood risks, sea-level rises, with recommendations for evacuation plans, outreach, and resilience efforts.
- Stabilization: Shoreline stabilization policies encourage alternatives to seawalls, protecting habitats and property.
- Capital Facilities Plans (CFPs): Infrastructure plans are updated to prioritize projects and efforts that further resilience against flooding, heatwaves, and droughts.
- Utilize Building Codes: Policy leveraging building codes to support heat-resilient infrastructure like cooling centers, green roofs, and natural ventilation.
- Infrastructure resilience: Policies suggest burying power lines, creating redundancies, and supporting renewable energy for emergency preparedness.
- Vulnerable populations: Prioritize vulnerable and frontline communities for benefits like access to renewable energy, more trees, and better emergency preparedness.
- Greenhouse Gas (GHG) Emission Reduction: Policies are designed to reduce greenhouse gas emissions by focusing on reducing the distance we travel, promoting new transportation options, and encouraging energy-efficient solutions like electric vehicles (EVs) and EV charging stations. These policies also aim to motivate the construction of new buildings and the renovation of existing ones using low-carbon building materials to help protect the environment.

## Implementation Element

The main changes in this element are expanding implementation measures in line with revised policy directives in each subsequent chapter. These main implementation changes center around the following actions:

- Agricultural preservation actions
- Affordable housing in LAMIRDS
- Transportation improvements for multi-modal options
- Urban growth development concentrations
- Greenhouse Gas (GHG) reductions

## SUMMARY OF LAND USE AND ZONING MAP CHANGES

The Comprehensive Plan periodic update includes a land use and zoning map change to expand the City of Anacortes Urban Growth Area. The petition seeks to incorporate nine (9) city-owned parcels, totaling 107.24 acres, into the Anacortes UGA. The parcels are currently being used—and will continue to be used—for recreational purposes. No other land use and zoning map changes are proposed.