



TO: Jack Moore, Planning and Development Services Director
Robby Eckroth, Senior Planner
Tara Satushek, Senior Planner

FROM: Clay White, Director of Planning

DATE: July 16, 2024

RE: July 23, 2024, Planning Commission briefing – 2025 Periodic Comprehensive Plan Update

We look forward to the opportunity to brief the Skagit County Planning Commission on July 23, 2024, regarding the 2025 Periodic Comprehensive Plan update. The briefing will focus on providing a:

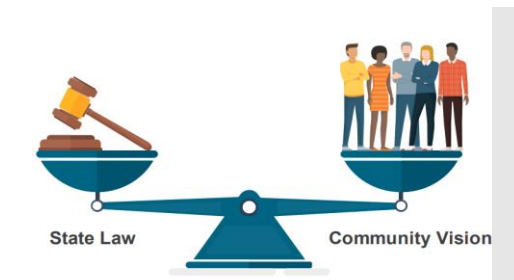
- Project overview
- Project schedule overview and update
- Community engagement overview
- Presentation on Preliminary Draft Policy amendments for the Rural and Natural Resource Elements

We look forward to answering any questions the Planning Commission may have and receiving feedback on the Preliminary Draft Policy amendments for the Rural and Natural Resource Elements. Your comments will help as we continue efforts to engage the community and develop a complete Comprehensive Plan draft this winter.

Background

The Washington State Growth Management Act (GMA) requires cities and counties to update Comprehensive Plans and implementing development regulations every 10 years (RCW 36.70A.130). Comprehensive Plans are 20-year policy documents which guide the community vision for growth (population, housing, and employment), transportation, capital facilities and utilities, parks, recreation and open space, rural areas, and protection of natural resource lands (RCW 36.70A.070). While the deadline to update the comprehensive plan was June 30, 2025, recent legislation ([House Bill 2296](#)) extended the deadline to December 31, 2025. Skagit County is still focused, however, on completing this project by June 30, 2025.

Comprehensive Plan updates are an opportunity to revise the existing Plan to ensure consistency with updated state laws/case law since the last update, Best Available Science (BAS) for incorporation into critical areas regulations and changes in local conditions. Given the Growth Management Act (GMA) is a bottom-up planning process, having robust engagement as part of the update will ensure the community vision is captured in the Plan as we look out to 2045. Strong community engagement also ensures the Planning Commission and Board of County Commissioners have the best information as updates to the Plan are considered.



Schedule Overview

The 2025 Periodic Comprehensive Plan update is currently on schedule for completion by June 30, 2025. Efforts this spring have focused on community engagement and early data collection and analysis, which provides the foundation for the project.

The next phase of the project is policy drafting. The goal is to ensure the Skagit County Comprehensive Plan not only aligns with the GMA and Countywide Planning Policies, but also reflects the community vision as the the county plans for growth out to 2045.

To ensure the community can provide robust input and the Planning Commission has ample opportunity to provide early direction, the project schedule has a two-step policy review process. Preliminary draft policy amendments, for each comprehensive plan element, will be prepared and brought to the Planning Commission for initial comments between July and October 2024. In addition, a 30-day comment period will be provided each month for the public to provide early comments. More information about the schedule and opportunities to comment on these early drafts may be found on the [project website](#).

After these early briefings with the Planning Commission and public comment, a draft comprehensive plan will be developed and issued in early 2025. The draft comprehensive plan will also be released to the public for comment and the Planning Commission will review as part of public meetings and hearings before being completed this June.

Summer 2025 preliminary policy review schedule

Topic	Planning Commission – Preliminary Review	Comment Period	Planning Commission Second Review
Rural Natural Resource Lands	July 23, 2024	7/23/2024 to 08/22/2024 4:30 p.m.	Early 2025
Land Use Housing Economic Development	August 13, 2024	8/13/2024 to 09/12/2024 4:30 p.m.	Early 2025
Transportation Capital Facilities, and Utilities	September 24, 2024	9/24/2024 to 10/24/2024 4:30 p.m.	Early 2025
Climate & Resiliency Environment	October 22, 2024	10/22/2024 to 11/14/2024 4:30 p.m.	Early 2025

Overall project schedule



Community Engagement Overview

Early community engagement for the 2025 Periodic Comprehensive Plan update has been completed. In addition to creating a community engagement plan, a project website has been created. The website provides information about the project, schedule, information on events, and allows interest parties to sign up to receive notices of opportunities to connect and participate. As initial draft policies are released this summer, the project website will provide information on when elements will be released for comment and provide an online comment option.

First Community Survey An initial survey was completed between April – May 2024 and distributed widely across Skagit County. The survey collected over 700 responses and identified strengths, weaknesses, and future focus areas for the County. The general feedback collected in this initial survey guides the next series of engagement opportunities to collect more detailed information. This has been included in the community engagement report on the project website [project website](#).

Stakeholder Interviews Eight stakeholder interviews were held between June 10th and July 10th. These stakeholder interviews engaged with community groups across Skagit County focusing on environment, housing, agriculture, and economic development. **Stakeholder interviews were completed on July 10th and will be included in the community engagement report submitted to the Planning Commission for review in August.**

Open Houses Three open houses were held at the end of the June in Sedro-Woolley, Anacortes, and Concrete. These locations were chosen to provide in-person opportunities for residents in western, central, and eastern Skagit County. These open houses educated residents on new state requirements for this periodic update and collected feedback specific to elements in the plan. **Open houses were completed on June 27th and will be included in the community engagement report and submitted to the Planning Commission for review in August.**

Public Comment

Please visit the [project website](#) for details about providing public comment. As part of the public participation plan, the next engagement opportunities will be 30-day public comment periods open around the time that draft policies will be released to the public every month until November. See the schedule overview above for details or visit the [project website](#). *The 30-day comment periods will continue until November 2024 and will be included in the community engagement report.*

Policy Revision Introduction

As part of its periodic update, Skagit County is auditing each Comprehensive Plan element for its ongoing applicability and consistency with state laws and local trends and needs. The Comprehensive Plan is used to set goals and policies for management of land use, rural character, natural resource lands, critical areas protection, housing, economic development, capital facilities, transportation, utilities, and more.

Skagit County Comprehensive Plan's goals set forth intentions and directions, and policies provide strategies or principles on how to achieve the goals. Each month one or more elements will be reviewed in a preliminary manner and brought forward for initial feedback. Our first set of goals and policies reviewed include those addressing Rural lands and Natural Resource lands. A Rural Element is required per RCW 36.70A.070 and must address rural character, limited areas of more intense rural development (LAMIRDs), and other facets. Classification and protection of natural resources including lands of long-term significance for agriculture, forestry, and mineral resources is required under the Land Use Element and under RCW 36.70A.060 and WAC 365-190.

Our review of the County's Rural and Natural Resources lands policies focus on a few overarching objectives as follows:

- Consistency with the Growth Management Act (GMA) and current law changes
- Streamlining of policy language to make it easier to apply across the planning period, leaving details in the County Code
- Use of active verbs to enhance readability and engagement

Furthermore, our focus includes identifying outdated policies for potential removal and recommending the integration of pertinent discussions from policies into relevant sections, thus fostering a more cohesive policy framework.

This memo aims to provide an overview of our approach and findings during the policy audit, highlighting key areas of review and consideration.

Rural Lands

The rural lands are designated for land uses that are compatible with the rural character of such lands and provide for a variety of rural densities and uses, but are not designated for urban growth, agriculture, forest, or mineral resources.

Skagit County rural areas designations allow for a variety of residential densities and rural and natural resource-related businesses while protecting rural character. Several of these designations implement the “limited areas of more intensive rural development,” or LAMIRDs, based on GMA.

Key recommendations include aligning the goals and policies with new state laws as follows:

- [SB 5275](#) on Public Services. This allows more options for development and redevelopment inside the boundary of a LAMIRD, which is an isolated pocket of more intense development in rural areas.
- [SB 6140](#). This allows new or redeveloped retail or food service use in a mixed-use LAMIRD.
- Recommendations are also made to move detailed language from policies to development regulations.

For clarification and readability of the Comprehensive Plan, we recommend adding tables for land uses and LAMIRDS as follows:

Exhibit 1. LAMIRDs Types

Type 1	Type 2	Type 3
Existing commercial, industrial, residential, or mixed-use areas	Small scale recreation and tourist use areas	Intensification of development on lots containing nonresidential uses
(a) Rural Village Residential. (b) Rural Intermediate. (c) Similk Beach LAMIRD. (d) Rural Village Commercial, which must fall within the Rural Village Residential boundary. (e) Rural Center. (f) Rural Freeway Service. (g) Rural Marine Industrial. (h) Some Natural Resource Industrial designations also meet these “(d)(i)” LAMIRD requirements, but not all.	(a) Small Scale Recreation (b) Tourism	(a) Small Scale Business. (b) Rural Business.

Source: BERK, 2024.

Natural Resources

The natural resource lands designation indicates areas intended to promote long-term, commercially significant resource use, particularly agricultural lands, forest lands, and mineral lands. These natural resources provide valuable products and raw materials that support jobs, create tax revenues, and are an important component to Skagit County’s economy and state and national markets. Farmlands and forests also provide aesthetic, recreational, and environmental benefits to the public, while contributing to a diverse community lifestyle and character.

Key recommendations include aligning the goals and policies with the recent changes in the state rules in Washington Administrative Code (WAC) 365-190 as follows:

- Countywide evaluation of potential de-designation requests for agriculture and forestry to understand cumulative effects, as well as for mineral lands (some leeway for lands under reclamation).
- Evaluate designation criteria to consider farmlands of statewide importance as well as prime and unique lands per recent state rule amendments.

Note: The County has detailed designation criteria important for both designation and de-designation requests which are highly scrutinized. Some criteria repeat state rules while others are unique applications of state rules to Skagit County conditions. The County could consider reducing the detail of some classification policies by referring to the State rules, or moving the detail to the County Code.

- Address Wildlife Urban Interface (WUI) in rural densities or Urban Growth Area (UGA) changes.

Remove time-bound policies likely to have been implemented, or using other established programs that fulfill a policy (e.g. county databases or clearing houses for agricultural lands could be met by the Voluntary Stewardship Program).

For clarification and readability of the Comprehensive Plan land uses, we recommend adding tables similar to the following:

Exhibit 2. Land Use by Zoning

Land Use Designation	Zoning
Agricultural – Natural Resource Lands	Ag-NRL
Industrial Forest – Natural Resource Lands	IF-NRL
Secondary Forest – Natural Resource Lands	SF-NRL
Rural Resource – Natural Resource Lands	RRc-NRL

Source: BERK, 2024

Please contact me at 206-705-8486 or clay.white@kimley-horn.com should you have any questions.

Appendices

Accompanying this memo for review by the Planning Commission at the regularly scheduled meeting on July 23rd are the following exhibits:

Appendix A. Rural Preliminary Policy Revisions

Appendix B. Natural Resource Lands Preliminary Policy Revisions