



Skagit County Planning Commission

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Chair Tim Raschko **Vice Chair** Tammy Candler
Members Angela Day, Vincent Henley, Amy Hughes, Jed Holmes, Kiera Wright, Joe Woodmansee, Patsy Good

Tuesday, April 15, 2025

Skagit County Planning Commission's Recorded Motion regarding 2025 Periodic Comprehensive Plan Update

Proposal publication date: February 13, 2025

Proposal name: 2025 Periodic Comprehensive Plan Update

Documents available at: www.skagitcounty.net/2025CPA

Public hearing body: Skagit County Planning Commission

Public hearing date: Tuesday, March 11, 2025, at 6:00 p.m.

Written comment deadline: Thursday, March 13, 2025 at 4:30 p.m.

PC deliberations (closed
record public hearing): April 8, 2025 & April 15, 2025

After considering the written and spoken comments and considering the record before it, the Planning Commission enters the following findings of fact, reasons for recommendation, and recommendations to the Board of County Commissioners on the 2025 Periodic Comprehensive Plan update.

Findings of Fact and Reasons for Recommendation

1. **Periodic Comprehensive Plan Updates.** The Washington State Growth Management Act (GMA) requires cities and counties to update Comprehensive Plans and implement 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.
2. **Continuing Review of Comprehensive Plans.** RCW 36.70A.130 mandates that Skagit County's Comprehensive Plan and corresponding development regulations be subject to continuing review and evaluation. Any amendments or revisions to development regulations must be consistent with and implement the Comprehensive Plan.

3. **Last Periodic Update to Comprehensive Plan.** Skagit County's last periodic update to the Comprehensive Plan was completed in 2016.
4. **2025 Periodic Comprehensive Plan Update.** Skagit County is conducting its periodic review and update of its Comprehensive Plan, Land Use/Zoning map, and Development Regulations pursuant to the Washington State Growth Management Act (GMA), RCW 36.70A.130(5). This non-project legislative action proposes plan, map and code amendments to address GMA requirements and consistency measures and to address local circumstances. The proposal is required under the Growth Management Act. Applicable sections of the Growth Management Act include, but are not limited to, RCW 36.70A.130, 36.70A.070, 36.70A.035, 36.70A.040, 36.70A.095, 36.70A.096, 36.70A.140. Below is a summary of the amendments:
 - a. The proposed draft update revises the goals and policies of the previously adopted 2016 Comprehensive Plan to be compliant with recent changes to state laws governing Comprehensive Plans including but not limited to:
 - (i) **Climate Planning Element.** A new Climate Element, Resiliency Sub-element, and Greenhouse Gas Emissions Reductions Sub-element required by RCW 36.70A.070 and RCW 36.70A.095.
 - (ii) **Updates to Housing Element.** Revisions to the Housing Element to accommodate housing at all income levels based on the 20-year population forecasts required by RCW 36.70A.070, RCW 43.62.035.
 - (iii) **Updates to Transportation Element.** The transportation inventory, land use assumptions, travel forecasts, Level of Service (LOS) standards, current and future transportation needs, and a transportation financial plan required by RCW 36.70A.070(6).
5. **Consistency with Countywide Planning Policies.** The proposal revises all goals and policies to adequately address recent changes to regional Countywide Planning Policies including the updates to the County's 20-year population, housing, and employment projections. On March 25, 2025, Skagit County adopted amendments to the Countywide Planning Policies which includes growth targets for population and employment through the year 2045.
6. **Growth Targets.** The Growth Management Act requires Skagit County to review population and employment growth for the 20-year planning period, which extends to 2045.
7. **Consistency with the recently adopted Capital Facilities Plan.** The proposal would revise the entire Comprehensive Plan document to ensure consistency with the recently adopted Capital Facilities Plan.
8. **Updates to Data.** Revisions to demographic, geographic, environmental, housing, transportation, and economic data necessary for inventory and assessment of Skagit County's land use, services, and facilities.

9. **Urban Growth Areas.** The GMA requires Skagit County to review Urban Growth Areas (UGAs) per RCW 36.70A.130(3).
10. **Comprehensive Land Use/Zoning Map Amendments.** Skagit County received one mapping requested City of Anacortes has submitted a docket petition to expand its Urban Growth Area (UGA) as part of the 2025 Skagit County Periodic Comprehensive Plan update. These city-owned parcels will not be used to accommodate City population, housing, or employment growth targets and will only be used for recreational and city operational uses.
11. **Community Engagement.** Skagit County held numerous opportunities for public engagement by hosting community surveys, open houses, tabling events, stakeholder interviews, and by reaching out to various community groups.
12. **Public Comment and Public Hearings.** Skagit County held a two-step policy review process. Preliminary draft policy amendments, for each comprehensive plan element, were prepared and brought to the Planning Commission for initial comments between July and October 2024. In addition, a 30-day comment period was provided each month for the public to provide early comments. After early briefings with the Planning Commission and public comment, a draft comprehensive plan was developed and issued on February 13, 2025. The draft comprehensive plan was released to the public for comment and the Planning Commission from February 13, 2025, to March 13, 2025. A public hearing was held by the Planning Commission to receive public testimony on March 12, 2025. All comments received and information shared to the Planning Commission are found on the project website. Public comments and testimony were recorded, and the Department provided a written response to the comments received and incorporated policy revisions as appropriate and in alignment with the Countywide Planning Policies, state law, and community visioning principles.
13. **Energy Resiliency.** The Planning Commission acknowledges recent changes to RCWs that show movement toward reduction or elimination of greenhouse gas emissions. However, we believe a healthy and resilient Skagit County community should maintain options for a variety of energy sources until such times as advancements in technology negate the need for multiple options to include fossil fuels.
14. **Agricultural Advisory Board Recommendation.** The Agricultural Advisory Board supports the recommended changes to the agricultural policies in the Natural Resource Element, as recommended by the Planning Commission.

Recommendation

The Planning Commission recommends that the Board of County Commissioners **approve** the 2025 Periodic Comprehensive Plan Update with the following changes:

1. **Staff Recommendations.** The Planning Commission recommends incorporating all 18 Staff Recommendations in Attachment C, with the following changes:
 - a. Revise **Recommendation #1** with the following amendments:

- i. **Policy 4A-1.1(a).** Amend the Agricultural Resource Lands criteria to include parcels which are 1 acre or greater, rather than 5.
 ...Generally, all lands in unincorporated Skagit County which are parcels ~~1 5 acres~~ or greater, and that contain “prime farmland soils” as determined by the USDA Natural Resource Conservation Service, shall be identified (see the narrative for a description of prime farmland soils). The County may also consider unique farmland soils and farmlands of statewide importance....
- ii. **Policy 4A-1.1(b).** Remove the requirement that Agricultural-Natural Resource Lands be located in the 100-year floodplain.
- iii. **Policy 4A-1.1(c)(iv).** Amend to include irrigation districts in addition to diking and drainage districts when referencing special purpose districts.
- iv. **Policy 4A-3.1.** Add reference to WAC 365-190-040.
- v. Add references to all policies within the Natural Resource Lands element addressing de-designation of resource lands that reference the applicable Washington Administrative Code (WAC) sections: WAC 365-190-050 for agricultural resource lands, WAC 365-190-060 for forest resource lands, and WAC 365-190-070 for mineral resource lands. References should be incorporated based on the type of natural resource.
- vi. Bring consistency to countywide analysis language in policy **4A-1.1, 4A-3.1, 4B-1.1, and 4B-1.3** by adding the word comprehensive and removing county-led.
- b. **Recommendation #2.** Add a definition for the Wildland Urban Interface to the glossary.
- c. **Recommendation #5.** Make the following amendments and additions:
 - i. Add Storage to the Forest Carbon Sequestration heading.
 - ii. **Policy 4B-8.5** Amend policy with the following:
 Promote and encourage forest management and forest sector practices that do not result in substitution, leakage, or negative environmental outcomes.
- d. Incorporate **Recommendation #6** with the following addition to encourage long-term protection of forest land:
 Policy 2G-1.1 Allow the separation of an existing house from the larger parcel where it is located on lands designated Agricultural-Natural Resource Land, Secondary Forest – Natural Resource Land, and Rural Resource-Natural Resource Land in order to encourage long-term protection of agricultural and forest land. Establish conservation easement on the separated resource land in perpetuity.

- 2. **Introduction & Summary.** The Planning Commission recommends making the following amendments to the Introduction & Summary:


- a. Consider strengthening the Community Values section (Page 28) by adding a historical narrative and more accurately reflect the priorities and values expressed in the community surveys.
3. **Urban, Open Space, and Land Use Element.** The Planning Commission recommends making the following amendments to the Land Use Element:
 - a. Remove the reference to the zoning of Hope Island Inn on the Swinomish UGA paragraph of Page 49 as it is inaccurate.
4. **Urban, Open Space, and Land Use Element.** The Planning Commission supports policies 2A-8.6 and 2A-8.7 on page 65 to encourage increasing the density allowed in unincorporated urban growth areas and to reduce future allocations into rural areas.
5. **Utilities Element.** The Planning Commission recommends making the following amendments to the Utilities Element:
 - a. Amend Policy 9A-5.1 with the following language: “The county shall prioritize the transition to renewable energy sources in both new and existing county buildings where feasible.”
 - b. Amend policies under Goal 9A-5 to say should rather than shall.
6. **Climate and Resiliency Element.** The Planning Commission recommends making the following amendments to the Climate and Resiliency Element:
 - a. Amend Policy 12J-1.1 with the following: Develop regulations, if appropriate, after in-depth analysis and stakeholder engagement, for elevating or setting back new and substantially improved structures to reduce the risk of damage caused by sea level rise.
7. **Anacortes Urban Growth Area Expansion.** The Planning Commission recommends approving the Anacortes Urban Growth Area expansion that would include 9 parcels into the Anacortes Urban Growth Area for recreational and city operational purposes. The UGA expansion will not be used for the purposes of accommodating population, housing, or employment growth.

Commission Vote	Support	Oppose	Absent	Abstain
Tim Raschko, Chair	X			
Tammy Candler, Vice Chair	X			
Jed Holmes			X	
Vince Henley	X			
Amy Hughes	X			
Angela Day	X			
Joe Woodmansee	X			
Kiera Wright	X			
Patsy Good	X			
Total	8	0	1	0

The Planning Commission recommends that the Board of County Commissioners adopt the 2025 Periodic Comprehensive Plan update as recommended.

This recorded motion is **approved** on this 15th day of April 2025.

SKAGIT COUNTY PLANNING COMMISSION
SKAGIT COUNTY, WASHINGTON



Tim Rasenko, Chair

4-15-25

Date



Jack Moore, Secretary

4-16-25

Date

Attachments

- Attachment C - Staff Recommendations
- Agricultural Advisory Board Memo

Planning and Development Services recommends the following policy amendments:

Natural Resource Policies

Recommendation # 1. Remove policy amendments proposed within the Natural Resource Lands Element and retain the 2016 Natural Resource Element policies with the following exceptions (noted in track changes).

Recommendation is based on public comments: 28, 64, 54, 59, 29, 36, 26, 70, 71, 74, 76

policy 4A-1.1 Agricultural Resource Lands Designation Criteria: The following criteria, together with the Washington Department of Commerce Minimum Guidelines to Classify 118 Agricultural Lands in WAC 365-190-050, shall be considered when designating Agricultural Resource Lands: (a) Generally, all lands in unincorporated Skagit County which are parcels 5 acres or greater, and that contain “prime farmland soils” as determined by the USDA Natural Resource Conservation Service, shall be identified (see the narrative for a description of prime farmland soils). The County may also consider unique farmland soils and farmlands of statewide importance. (b) Then those lands meeting the parcel size and soils shall be retained in Agricultural Resource Lands designation, provided that a majority of the area falls within the 100-year floodplain as adopted by the U.S. Federal Emergency Management Agency (FEMA). (c) Parcels meeting both (a) and (b) above shall be further evaluated for inclusion or exclusion in Agricultural Resource Lands based upon the following additional factors: (i) (ii) The land is in a current-use tax assessment program derived from the Open Space Taxation Act, RCW 84.34 as it pertains to agriculture. The land is currently in agricultural use or has been in agricultural use within the preceding ten years. (iii) Existing land uses are primarily agricultural and minimal financial commitment to non-farm uses has been made. (iv) The area includes special purpose districts (such as diking and drainage districts) that are oriented to enhancing agricultural operations, including drainage improvement and flood control. (v) Adjacent lands are primarily in agricultural use. (vi) Land use in the area demonstrates a pattern of landowner capital investment in agricultural operation improvements such as irrigation, drainage, manure storage, barn refurbishing, enhanced livestock feeding techniques, agricultural worker housing, etc. (vii) The land is not already characterized by urban growth, and designation considers the effects of proximity to population areas. (d) Parcels that may not meet any of the criteria described in (a), (b), and (c) above may nonetheless be included to provide logical boundaries to the Agricultural Resource lands designation and to avoid small “islands” or “peninsulas” of conflicting non-resource

land uses in the midst of resource lands. Similarly, parcels that meet some or all of the criteria described in (a), (b), and (c) above may be excluded to provide logical boundaries to the Agricultural Resource lands designation and to avoid conflict with existing land uses. (e) Site-specific proposals to de-designate natural resource lands must be deferred until a comprehensive countywide analysis is conducted.

Policy 4A-3.1 Long-Term Designation of Agricultural Lands: Designation of Agricultural Lands is intended to be long-term. De-designation is discouraged, but may be considered only when compelled by changes in public policy, errors in designation, new information on resource lands or critical areas, circumstances beyond the control of the landowner, or an overriding benefit to the agricultural industry. Evaluate de-designation requests with the same criteria under policy 4A-1.1 used for designation of Agricultural-Natural Resource Lands, after a countywide analysis is completed.

Policy 4A-4.6 ~~Habitat Restoration Projects: Prohibit h~~Habitat restoration projects ~~are a permitted use~~ on agricultural lands except through a hearing examiner special use permit process to ensure so long as it is shown through project review that the proposed restoration project ~~does~~ not have an adverse impact on hydrologic functions, drainage infrastructure or the ongoing agricultural use of adjacent properties.

Policy 4B-1.1 Industrial Forest Land Designation Criteria: The following criteria together with the Washington Department of Commerce Minimum Guidelines to Classify Forest Resource Lands in WAC 365-190-060, shall be considered when classifying Industrial Forest lands: (a) All lands in unincorporated Skagit County shall be screened for Industrial Forest designation based on an average parcel size of 40 acres or greater, with one or more of the following characteristics: (i) The area contains WA State Department of Revenue – Private Forest Land Grade (PFLG) soils 1-5. (ii) The area includes lands which are primarily devoted to and used for growing and harvesting timber. (b) Lands meeting (a), located in blocks of contiguous parcels approximately 160 acres and larger, shall be designated Industrial Forest. (c) Parcels meeting both (a) and (b) above shall be further evaluated for inclusion or exclusion in Industrial Forest Lands based upon the following additional factors: (i) (ii) The parcel is enrolled in a current-use tax assessment program under the provisions of RCW 84.33 and 84.34 as it pertains to forestry. Such current-use tax assessment status is not, by itself, a sufficient determining factor for inclusion or exclusion, but is only part of the relevant characteristics to be considered. The area has limited public services and facilities (although the area may be located within a

public water district). (iii) The land is not already characterized by urban growth, and designation considers the effects of proximity to population areas. (d) Parcels not meeting any of the criteria above in (a), (b), or (c) may still be included to provide logical boundaries to the Industrial Forest lands designation and to avoid small “islands” or “peninsulas” of conflicting nonresource land uses in the midst of resource lands. Similarly, parcels that meet some or all of the criteria above in (a), (b), or (c) may be excluded to provide logical boundaries to the Industrial Forest lands designation and to avoid conflict with existing land uses. For example, areas with pre-existing conditions such as vested subdivisions and rural development, other than isolated pre-existing single-family homes, where commercial forestry is not being practiced, and islands surrounded by multiple sized parcels with existing residences, shall not be classified as Industrial Forest lands. However, isolated, pre-existing residences shall not preclude the adjacent forest land areas from being classified Industrial Forest. (e) Conduct a comprehensive countywide analysis consistent with WAC 365-190-040(10), and do not review forest resource lands designations solely on a parcel-by-parcel basis.

Policy 4B-1.3 Secondary Forest Resource Land Designation Criteria: The following criteria shall be considered when designating Secondary Forest lands: (a) Secondary Forest lands are derived from initially designated Industrial Forest lands, and are located primarily within a ¼ mile band at the perimeter of Industrial Forest lands which contain one or more of the following characteristics: (i) (ii) The area contains WA State Department of Revenue – Private Forest Land Grade (PFLG) soils 1-5. The area includes lands which are primarily devoted to and used for growing and harvesting timber. (b) The above-described parcels shall be further evaluated for inclusion or exclusion based on the following additional factors: (i) The parcel is enrolled in a current-use tax assessment program under the provisions of RCW 84.33 and 84.34 as it pertains to forestry. Such current-use tax assessment status is not by itself a sufficient determining factor for inclusion or exclusion, but is only part of the relevant characteristics to be considered. (ii) The area has limited public services and facilities (although the area may be located within a public water district). (iii) Secondary Forest lands need not be designated adjacent to Agricultural lands. (c) Parcels that do not meet any of the criteria described above in (a) or (b) may still be included or excluded to provide logical boundaries to the Secondary Forest lands designation and to avoid small “islands” or “peninsulas” of conflicting non-resource land uses in the midst of resource lands. Isolated, pre-existing residences shall not preclude the adjacent forest land areas from being classified Secondary Forest. (e) Conduct a comprehensive county-led, countywide analysis

consistent with WAC 365-190-040(10), and do not review forest resource lands designations solely on a parcel-by-parcel basis.

Policy 4B-2.5 Healthy Forest Initiative: Skagit County should continue to support a countywide initiative to promote fuel-reduction and forest restoration projects in cooperation with the U.S. Department of Agriculture, Department of Natural Resources, and other federal and state agencies.

Policy 4B-3.3 Long-Term Designation of Forest Lands: Designation of Forest Lands is intended to be long-term. De-designation is discouraged, but may be considered only when compelled by changes in public policy, errors in designation, new information on resource lands or critical areas, or other circumstances beyond the control of the landowner, or an overriding benefit to the forest industry. Evaluate de-designation requests with the same criteria under 4B-1.1 and 4B-1.3 used for Industrial Forest Resource Lands and Secondary Forest Resource Lands. Consider the development of mitigation measures and criteria for the loss of productive lands.

Goal 4D-1 Designate and map long-term commercially significant mineral resource lands as an overlay to the Comprehensive Plan Map. In classifying, designating and de-designating mineral resource lands, counties and cities must conduct a comprehensive countywide analysis consistent with WAC 365-190-040(10), with the exception of owner-initiated requests for designation. The County should not review mineral resource lands designations solely on a parcel-by-parcel basis. The County may de-designate mineral resource lands without a comprehensive countywide analysis if mining operations have ceased and the site reclaimed.

Recommendation # 2. Revise and add new policy to continue addressing wildfire resilience and development in wildland urban interfaces.

Recommendation is based on comments: 39, 38, 76, 51, & 59 requesting additional language to reduce development pressure around Wildland Urban Interface.

New Policy 4B-2.13 Identify and implement strategies for reducing residential development pressure in the Wildland Urban Interface.

Recommendation # 3. Add new policies and revise 4D-4.1 for continued education and resources for mineral overlay administration.

Recommendation is based on comments 5 & 48 requesting additional education around mineral overlay zones and statewide resources and data.

New Policy 4D-3.8 Incorporate Mineral Resource Overlay education and resources to the Planning and Development Services Natural Resource Lands website that provides education on mineral resource lands.

New Policy 4D-3.9 Utilize existing statewide resources for natural resource administration like the Department of Natural Resources Geologic Information Portal (<https://www.dnr.wa.gov/geologyportal>).

Policy 4D-4.1 Coordinate State and Local Regulations: Development regulations for mineral resource lands in the county shall be consistent with applicable Washington State mining regulations ~~and~~ including the Washington Department of Natural Resources rules. Overlap in the regulatory authority between Skagit County and the DNR may occur to ensure public health and safety in matters not under the DNR's jurisdiction.

Recommendation # 4. Revise Policy 4B-2.12 to address evacuation routes.

Recommendation is based on comment 65 requesting identification of evacuation routes.

Policy 4B-2.12 Develop a county-wide comprehensive wildfire resilience strategy planning program to increase public safety and awareness regarding forest fire dangers, and establish the means of managing, reducing and suppressing catastrophic wildfires. Including developing evacuation zones and bi-annual review of evacuation routes.

Recommendation # 5. Add new goal with policies to NRL Element under the Forest Resource Lands section for forest operations and carbon sequestration. Insert on page 147 after policy 4B-7.4

Recommendation is based on comment 1.

Subheading: Forest Carbon Sequestration

New Goal 4B-8: Continue to promote and support sustainable working forestry operations and recognize the benefits that forestry has for sequestration and storage of carbon.

New Policy 4B-8.1 Promote and encourage sustainable forest management actions that consider the life cycle of carbon storage over time, across all pools, including but not limited to, soil, green biomass, harvested wood products, reuse, recycling, and end of life fate.

New Policy 4B-8.2 Acknowledge the vital role that forest management plays in wildfire risk reduction, carbon storage, and carbon sequestration.

New Policy 4B-8.3 County actions should conform to and support RCW 70A.45.090, which stipulates, “Washington's existing forest products sector, including public and private working forests and the harvesting, transportation, and manufacturing sectors that enable working forests to remain on the land and the state to be a global supplier of forest products.

New Policy 4B-8.4 Retain the value of working forests by ensuring the long-term maintenance of an intact and synergistic industrial sector, as an integral component of the state’s contribution to the global climate response and efforts to mitigate carbon emissions.

New Policy 4B-8.5 Promote and encourage forest management and forest sector practices that do not create unintended negative impacts on greenhouse gas benefits or other environmental outcomes that occur outside the area where a forest practice is implemented, potentially offsetting or reducing the intended positive effects.

New Policy 4B-8.6 Support local, state, and federal programs that promote sustainable forest management practices to reduce greenhouse gas emissions by minimizing wildfire risk.

New Policy 4B –8.7 Support local mills using regional wood supplies minimizing the carbon footprint from outsourced wood products.

New Policy 4B-8.8 Continue to review best available science on working forests as an effective method of carbon sequestration and update policies as needed to support sustainable forest management as a method of carbon sequestration.

Land Use Policies

Recommendation # 6.

Revise 2G-1.1 to include Secondary Forest Natural Resource Lands.

Policy 2G-1.1 Allow the separation of an existing house from the larger parcel where it is located on lands designated Agricultural-Natural Resource Land, Secondary Forest – Natural Resource Land, and Rural Resource-Natural Resource Land in order to encourage long-term protection of agricultural land. Establish conservation easement on the separated resource land in perpetuity.

Transportation Policies

Recommendation # 7. Revise Goal 8A to identify Washington Department of Transportation.

Recommendation is based on comment 4

Goal 8A Plan and maintain a safe and efficient, ~~and equitable~~ regional transportation system for the movement of people and goods in partnership, where appropriate, with the cities, tribes, transit agencies, Washington Department of Transportation, and the Skagit Council of Governments

Recommendation # 8. Add new policy to improve coordination for development related permitting adjacent to state facilities.

Recommendation is based on comment 4

New Policy 8A-1.1 Review development projects near or adjacent to state facilities to coordinate local access and address transportation needs for all users.

Recommendation # 9. Add new policies to address better administration of traffic circulation.

Recommendation is based on comment 4

New Policy 8A-1.2 Encourage use of existing and new public roads to maximize internal circulation within Skagit County and promote economic development and community connectivity.

New Policy 8A-1.3 Develop the local internal road network to increase local circulation at the rural service centers/ areas of rural commercial development/ LAMIRDs.

Recommendation # 10. Add new policy to coordinate with organizations for non-motorized projects.

Recommendation is based on comment 35

New Policy 8A-1.4 Work with Skagit Council of Governments Non-Motorized Transportation Advisory Committee (NMAC) to coordinate non-motorized transportation projects.

**Climate Element, Resilience Subelement, Greenhouse Gas Emissions Subelement
Forest Resiliency Goals and Policies (in Resilience Subelement)**

Recommendation # 11. New goal 12 K with new policies in Resilience Subelement

Recommendation is based on comment 1 requesting policies to be established for forest resilience.

New Goal 12 K Promote climate resilience through ensuring healthy resilient forests that are sustainably managed.

New Policy 12K-1.1 Ensure a resilient, operable and viable forest product sector by promoting and ensuring the well-being of timber communities.

New Policy 12K-1.2 Support the forestry industry in active forest management and retaining the critical infrastructure.

New Policy 12K-1.3 Support the Forest Practice Rules, which are vetted through the Adaptive Management Program, and the DNR Sustainable Forest Policies adopted in 2005 and amended through 2024.

New Policy 12K-1.4 Promote forest road system, which includes road building and maintenance to access forested landscape to promote fire resilience.

New Policy 12K-1.5 Build the Good Neighbor Authority relationship with the USFS to promote and foster crucial forest management to aid in fire resilience and promoting carbon sequestration.

Recommendation # 12. New goal 12L with policies in Resilience Subelement

Recommendation is based on comment 1 requesting policies to be established for forest resilience.

New Goal 12L Encourage forest management practices which minimize the size, scope, and impact of future wildfires.

New Policy 12L-1.1 Promote Forest Health by ensuring a viable industry and performing good forest practices management practices outlined in the CWPP and NFPA codes and standards manuals: (1140 – Wildland Fire Protection, 1141 – Infrastructure for Land Development, 1142- Water Supplies, 1143 – Wildfire

Management, 1144 – Reducing Structural Ignition). Support active vegetation management as prescribed in the CWPP home ignition zones to reduce wildfire risk and improve forest health.

New Policy 12L-1.2 Educate on the importance of reducing excessive fuel loading.

New Policy 12L-1.3 Educate in developing fuel breaks where appropriate to protect infrastructure and high value ecosystems.

New Policy 12L-1.4 Support bolstering wildland fire fighting capacity of rural fire districts.

New Policy 12-1.5 Incorporate best management practices outlined in the CWPP and NFPA codes and standards manuals: (1140 – Wildland Fire Protection, 1141 – Infrastructure for Land Development, 1142- Water Supplies, 1143 – Wildfire Management, 1144 – Reducing Structural Ignition). Support active vegetation management as prescribed in the CWPP home ignition zones to reduce wildfire risk and improve forest health.

Non-policy Recommendations

All references to page numbers are based the Planning Commission public hearing labeled version 2 on the [Skagit County Comprehensive Plan Update website](#).

Recommendation # 13. Page 126 include the following language: “For WA DNR/Washington Geological Survey maps you can also cite the Washington Geological Survey’s Geologic Information Portal.”

Recommendation is based on comment 5 & 47

[For WA DNR/Washington Geological Survey maps you can also cite the Washington Geological Survey’s Geologic Information Portal.](#)



Comprehensive Plan

202516-
204536

4: Natural Resource Lands

Soils Used in Designating Agricultural and Forest Resource Lands

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Mineral Resource Overlay

Skagit County designates, as Mineral Resource Overlay, the following geologic formations, subject to consistency with other land-use designation criteria. Exclusionary criteria may result in some, otherwise qualified mineral resources undesignated. Refer to U.S. Geological Survey and Washington State Department of Natural Resources survey maps for explanations of the classifications used below. These maps are available for viewing at Skagit County Planning & Development Services.

Sand and Gravel Deposits

Qa	Quaternary Alluvium
Qa(s)	Holocene Alluvium – Sand
Qaf	Holocene Alluvial Fan Deposits
Qga	Advance Glacial Outwash
Qgas	Advance Glacial Outwash – Sand
Qgdm(e)	Everson Glaciomarine Drift
Qgo	Glacial Outwash
Qgo(e)	Everson Interstade – Glacial Outwash
Qgo(es)	Everson or Sumas – Glacial Outwash
Qgo(i)	Ice-Contact – Recessional Outwash
Qgo(s)	Glacial Outwash – Sumas Stade
Qgoc	Glacial Outwash, silt and clay – Vashon Stade
Qgom(s)	Glacial Outwash, marine – Sumas Stade
Qoa	Older Alluvium
Qoa(s)	Older Alluvium – Sand Facies

Bedrock Formations

JTRu(ts)	Dunite
JMV(u)	Greenstone
Jl(f)	Greenstone
PMPms(c)	Limestone

Recommendation # 14. Page 122 after NRL existing conditions include references statewide data and reference including: DNR aggregate resources, geologic information portal, and geologic planning website.

Recommendation is based on comment 5 & 47 requesting greater education actions around natural resource lands specifically mineral resource overlay.

For more resources regarding geologic planning or mineral overlay information visit the Washinton Department of Natural Resources Aggregate Resources website (<https://www.dnr.wa.gov/aggregate-resources>), geologic information portal

(<https://www.dnr.wa.gov/geologyportal>), or geologic planning website (<https://www.dnr.wa.gov/programs-and-services/geology/geologic-planning>).



**Comprehensive
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4: Natural Resource Lands
Natural Resource
Land Support
Mechanisms

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During the 2005-2007 update of the Mineral Resource Overlay, Skagit County conducted an in-depth review of geologic formations and potential mineral resource deposits. This mapping update confirmed many known mineral resources and identified new mineral resources. A very few currently conforming mining operations did not meet the criteria for mineral resource land overlay designation as applied during this mapping review. Due to the economic conditions of these operations and their beneficial access to markets, Skagit County will consider these existing operations as conforming uses within the provisions of the Mineral Resource Overlay.

It is important to ensure that mining policies and regulations, in addition to protecting the resource and its related activities, also protect public health, safety and the environment. These policies and their implementing regulations work in concert with other federal and State laws to ensure that mining operators and surrounding land owners remain good neighbors.

The Natural Resource Lands Element also establishes Right-to-Manage Natural Resource Lands goals and policies to promote a clear mandate for mineral extraction activities as a priority on lands designated as Mineral Resource Overlay. The vitality of the mineral industry is also promoted in the Natural Resource Lands Element by integrating support and information services in a Natural Resource Lands Clearinghouse and allowing support services and businesses to encourage development of 'value-added' products.

Natural Resource Land Support Mechanisms


Right to Manage Natural Resource Lands

Where non-natural resource land uses (primarily residential uses) extend into natural resource areas or exist side-by-side, natural resource management operations are frequently subject to nuisance complaints. When complaints relate to the undesired effects of properly regulated and conducted natural resource lands activities, natural resource land managers are required to set aside time and financial resources in order to respond.

Right-to-Manage Natural Resource Lands policies are intended to promote a good neighbor policy between natural resource lands and non-natural resource land property owners by advising purchasers and users of property adjacent to or near natural resource land management operations of the inherent potential difficulties associated with such purchase or residence. It is essential that neighbors and residents of natural resource lands better understand and be prepared to accept attendant conditions and the natural result of living in or near natural resource lands and rural areas. The Right to Manage Natural Resource Land goals and policies

Recommendation # 15. Pages 358, 376, 382, 385, 404, 426 Change all references to “Economic Development Association of Skagit County” to “Economic Development Alliance of Skagit County”.

Recommendation is based on comment 51

 <p>Comprehensive Plan 202516-204536</p> <p>11: Economic Development Demographic Profile</p> <p>Preface 1 Contents 2 Land Use 3 Rural 4 Natural Resource Lands 5 Environment 6 Shoreline 7 Housing 8 Transportation 9 Utilities 10 Capital Facilities 11 Economic Development 12 Climate and Resiliency 1213 Implementation Appendices</p> <p>358</p>	<p>The Economic Development Element of the Skagit County Comprehensive Plan is a companion to the <i>Comprehensive Economic Development Strategy (CEDS)</i> that is maintained by the Skagit Council of Governments (SCOG). The Council is a regional government body charged with a number of activities including the coordination of local economic analysis and planning. The <i>Comprehensive Economic Development Strategy</i> is updated periodically by the Skagit Council of Governments in partnership with the Economic Development Association of Skagit County to address requirement of the Growth Management Act (GMA) and the U.S. Economic Development Administration. The Community Economic Development Strategy provides information on trends, needs, problems and opportunities, and identifies strategies for implementing the goals in this Element.</p> <p><u>The SCOG Board of Directors adopted the revised CEDS at their meeting in December 2024. Visit the SCOG website to review the adopted 2024 Comprehensive Plan Economic Development Strategy and the 2024 Landscape Assessment and Data Profile.</u></p> <h2>Demographic Profile</h2> <p><u>Skagit County has seen steady growth in population over the past three decades with the population growing by 52,000 since 1990, mostly driven by in-migration. Urban areas grew faster than rural areas; Burlington grew the fastest while Mount Vernon accounted for the highest share of countywide growth since 2000. Skagit County's population growth was mostly in line with the Countywide Planning Policies (CPP) projections for 2036. According to the Washington State Office of Financial Management's (OFM) most recent projections, the county is projected to accommodate an additional 28,800 residents by 2045 – a growth rate of 0.9% per year on average for the next two decades¹⁴. Since 1990, total housing units in Skagit County have increased by over 23,000 units, with approximately 16,600 of these, or 71%, single family homes – versus 57% in the Puget Sound region. The overall mix of housing unit types in the county has remained mostly stable over time, with single family homes accounting for 73% of the housing supply in 1990 and 72% in 2023, again higher than the region, state, and neighboring counties. Housing production in Skagit County has slowed down in the past decade, and the overall availability of housing has not kept pace with growth in the number of households¹⁵.</u></p> <p>¹⁴ OFM Growth Management Act County projections, Medium Scenario, 2022. Among the OFM projections, the Medium scenario is considered the most likely future.</p> <p>¹⁵ SCOG Comprehensive Economic Development Strategy, 2024.</p>
<p>7 Housing 8 Transportation 9 Utilities 10 Capital Facilities 11 Economic Development 12 Climate and Resiliency 1213 Implementation Appendices</p> <p>376</p>	<p><u>policy 11A-1.4 Implement permitting procedures that are understandable, predictable and can be accomplished within time periods that meet or exceed statutory requirements. Procedures for permitting that require approvals of both the County and other jurisdictions should be consistent.</u></p> <p><u>policy 11A-4.1 Encourage local business investments that provide economic and employment opportunities for all county residents.</u></p> <p><u>policy 11A-4.2 policy 11A-1.5</u> Work cooperatively with local jurisdictions, the Skagit Council of Governments, the Economic Development Association of Skagit County, the ports of Skagit and Anacortes, and federal and state agencies to promote economic development and employment opportunities consistent with countywide economic development policies.</p>

Attachment C – For review by the Planning Commission

5 Environment		<u>policy 11D-1.9</u> <u>Work cooperatively with local jurisdictions, the Skagit Council of Governments, the Economic Development Association of Skagit County, the ports of Skagit and Anacortes, and federal and state agencies to promote economic development and employment opportunities consistent with countywide economic development policies.</u>
6 Shoreline		
7 Housing		
8 Transportation		
9 Utilities		
10 Capital Facilities		
11 Economic Development	<u>policy 11E-1.2</u>	<u>policy 11D-1.10</u> <u>Cooperate with education providers and employers to ensure the availability of facilities and programs necessary to meet the needs of K-12, college, vocational and continuing education levels.</u>
<u>12 Climate and Resiliency</u>		
<u>1213</u> Implementation		
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11: Economic Development		impact for Skagit County.
Goals and Policies		
Preface	policy 11G-4-2 policy 11E-3.2	Link County capital facility planning and programming to the Comprehensive Economic Development Strategy (CEDS) to sustain a high quality of life and attract business investment.
1 Contents		
2 Land Use		
3 Rural		
4 Natural Resource Lands	policy 11G-4-3 policy 11E-3.3	Monitor and evaluate constraints to economic development caused by regulations and permitting procedures and implement revisions, if necessary, as part of annual or periodic comprehensive plan and development regulation updates. Coordinate with other (federal and state) permitting agencies to simplify procedures.
5 Environment		
6 Shoreline		
7 Housing		
8 Transportation		
9 Utilities	policy 11G-4-4 policy 11E-3.4	Maintain a growth management indicators monitoring program to measure progress in economic development initiatives in coordination with the Skagit Council of Governments and the Economic Development Association of Skagit County. The indicators program report should be updated at least every 3 ½ years to coincide with the periodic GMA update schedule.
10 Capital Facilities		
11 Economic Development		
12 Climate and Resiliency	policy 11G-4-5 policy 11E-3.5	Consider as part of the County's budgeting process outside funding sources such as grants, as well as careful fiscal needs analyses in order to ensure that tax revenue generation is competitive with other jurisdictions.
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2 Land Use		avenues for public and property owner input.
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Implementation Themes

The County's role in the overall regional growth management implementation process involves several major activities, all of which are discussed further in various sections of the Plan:

- **City/County coordination:** *Within an agreed-upon framework, the County works with the cities and towns to address growth and development in the Urban Growth Areas through the coordination of public infrastructure investment and permitting activities, and the forecasting and monitoring of growth to ensure that adequate land is available for future urban needs.*
- **Regional economic development:** *The County is a partner with the Skagit Council of Governments and the Economic Development Association of Skagit County in maintaining a program for retaining and attracting businesses that generate revenue and jobs.*
- **Regional transportation planning:** *The County is a partner in the Skagit Council of Governments Regional Transportation Planning Organization and the Metropolitan*

Recommendation is based on comment 41 expressing concern that the section is misrepresenting history of Skagit County.



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13: Implementation and Monitoring

Linking the Past to the Present

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Linking the Past to the Present

The Skagit Valley was inhabited for thousands of years before the arrival of settlers in the 19th Century. The cession of tribal lands through the Point Elliot Treaty of January 22, 1855 greatly changed traditional Native Americans' ways and beliefs. Land titles and surveys were alien ideas to the customs of Native Americans, but were basic to the farmers settling in the valley. A fern-covered prairie on March's Point seems to have been the site of the first white settlement. By 1870, other new settlements were located elsewhere in the Flats, although there was still very little development. Construction of dikes enabled the growth of farming on the rich delta land. By 1890 railroads were instrumental in supporting the farming, logging, and mining industries, featuring a line from Portland, Oregon, to Anacortes. During the 1890s, two north-south lines were completed through the county, connecting it with Seattle and Vancouver. By 1901, the east-west line was extended from Hamilton through Concrete and into Rockport. The Skagit River has played an important role in the history of Skagit County. Tribal settlements were located near salt water and along the rivers. For new settlers in the logging business, the Skagit provided the means to transport timber, although logjams hindered activity until 1889. By 1890, most of the land next to water had been logged off, and operations moved further inland using animals and machines to transport timber. The River and Sound also furnished an abundance of resources. Salmon provided an important food source for the early tribal peoples. Commercial fishing by new settlers began in the 1890s with the building of fish-processing plants and by 1900, clams and oysters were also being canned. By the turn of the century, however, over-fishing had reduced available stocks and experiments with fish hatcheries sought to supplement dwindling fish runs. Over the next thirty years, canneries continued to be productive in Anacortes. When the commercial fishing industry declined, other marine industries emerged, such as boat-building and recreational boating. Today, the Anacortes and La Conner marinas are among the largest in the State of Washington. Skagit County separated from Whatcom in 1883. In 1884, La Conner was established as the temporary county seat with its established port and considerable population. The county's first newspaper, the Skagit News, garnered sufficient support to make Mount Vernon as the county seat and a vote later in 1884 confirmed the change.

Comprehensive Planning Timeline

Following is an overview of Skagit County's comprehensive planning between 1965 and the adoption of its first comprehensive plan under the Growth Management Act (GMA):

- March 1965 Skagit County adopts its first Comprehensive Plan.
- September 1968 Comprehensive Plan is amended.

Recommendation # 17. Page 118 change sentence include citations to RCW

Recommendation is based on comment 29

Agricultural Resource Lands are those lands with soils, climate, topography, parcel size, and location characteristics that have long-term commercial significance for farming. Skagit County designates agricultural lands primarily based on the presence of prime agricultural soils following [RCW 36.70A.070 and 36.70A.170](#).

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■ Mineral Resource Overlay (MRO)

Agricultural Natural Resource Lands

Agricultural Resource Lands are those lands with soils, climate, topography, parcel size, and location characteristics that have long-term commercial significance for farming. Skagit County designates agricultural lands primarily based on the presence of prime agricultural soils. These lands are concentrated in the fertile floodplain of the Skagit River as it flows into the Puget Sound. There are also agricultural lands designated along the upper Skagit Valley in areas of rich alluvial soils. Based on the designation criteria presented in Chapter Element 4, Natural Resource Lands, Skagit County has designated an estimated 88,50688,564-acres of land as Agricultural lands, although significantly fewer acres are in full agricultural production in any given year. Designating valuable agricultural soils protects the resource for future use, regardless of current farming conditions. Designating also ensures a cohesive and distinct agricultural area within Skagit County, and limits the extent to which non-agricultural uses can conflict and interfere with farming.

Primary crops and agricultural products in Skagit County include apples, berries, floriculture and sod, potatoes, peas and other vegetables, vegetable seeds, dairy, and ornamental nursery stock. Skagit County's annual Tulip Festival brings in over \$60 million in economic activity, adding to the

Recommendation # 18. Page 18 & 387, change sentence to explain GHG icon.

Recommendation from consultant – technical error

This GHG icon appears throughout the Comprehensive Plan and represents policies that support or contribute to the reduction of GHG emissions through land use and transportation solutions, reduce per capita vehicle miles traveled, or prioritizes reductions that benefit overburdened communities.



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non-resource industry diversity, promoting a range of commercial retail and service businesses, increasing tourism, conserving natural resources and open spaces and fostering a healthy public-private cooperative partnership in support of diverse business operations and investment.

Chapter 12: Climate and Resiliency with Resiliency Sub-Element and Greenhouse Gas Emissions Sub-Element

This element addresses how Skagit County can address natural hazards aggravated by climate change, enhance natural areas for the purposes of hazard protection, enhance community resilience, reduce greenhouse gas emissions, reduce vehicle miles traveled, and prioritize reductions that benefit overburdened communities and promote environmental justice.

The Skagit County climate and resiliency element and sub-elements are integrated across all elements through policies. Policies that promote climate, resiliency, and GHG reductions are noted across the whole comprehensive plan with the following icons.



This resiliency icon appears throughout the Comprehensive Plan and represents policies that help address natural hazards aggravated by climate change, protect natural areas, and enhance community resilience.



This GHG icon appears throughout the Comprehensive Plan and represents policies that help address natural hazards aggravated by climate change, protect natural areas, and enhance community resilience.

Chapter 13: Implementation and Monitoring

This element describes the concepts involved in putting a plan into action, how this Plan is updated and amended, and how the Plan is monitored and evaluated. This chapter element also addresses how the Plan and its development regulations will be applied at the community level, through the community planning process.

Appendices

- Appendix A contains definitions and a list of acronyms used within this document. [Acronyms and Definitions](#) [Definitions and Acronyms List](#) Provides a list of key definitions and acronyms used throughout this document.



Skagit County Agricultural Advisory Board

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office 360-416-1338 • www.skagitcounty.net/planning

Skagit County Planning Commission
1800 Continental Place
Mount Vernon, WA 98273

4/11/2025

Dear Skagit County Planning Commissioners:

The Agricultural Advisory Board (AAB) is writing regarding the proposed changes to the 2025 Comprehensive Plan changes we were requested to comment on. The AAB supports all the proposed changes.

Policy 4A-1.1(a) and Policy 4A-1.1(b): Agricultural lands should be based on soil productivity, not location or size. The AAB agrees the 5-acre lower limit should be moved to 1 acre. Smaller parcels are vital and ideal for small and beginning producers to get their start in agriculture or even maintain a small, diversified farm. Treating these small parcels as the ag land they are will also reduce the desire to develop them. Removing the 100-year floodplain requirement will make it easier to include agricultural lands outside of the floodplain. As stated previously, ag land should be determined by the soil, not location or size.

Policy 4A-1.1(c)(iv): The AAB recommends including irrigation districts when referencing special use districts. They are special use districts vital to the productivity of agricultural lands and should be treated as such.

Policy 4A-3.1: Adding the reference to WAC 365-190-040 gives reason as to why a rule is in place reducing confusion in the plan.

Policies 4A-1.1, 4A-3.1, 4B-1.1, and 4B-1.3: Adding the word comprehensive and removing county led, The AAB supports this change for consistency and clarity if it does not cede any county authority to other organizations.

Thank you for considering our recommendations.

Sincerely,

A handwritten signature in black ink that reads "Michael Hughes". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Michael Hughes
Chair, Agricultural Advisory Board

Advisory Committee Members:

Michael Hughes (Chair), Kraig Knutzen (Vice Chair), Nels Lagerlund,
Justin Hayton, John Morrison, Terry Sapp, Cindy Kleinhuizen, Matt Steinman,
Steve Wright, Michael Trafton, Steve Skrinde, Kim Mower, Don McMoran (Ex Officio)