

TO: Jack Moore, Planning and Development Services Director
Robby Eckroth, Senior Planner
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FROM: Erin O'Kelley,
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DATE: April 21, 2025

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

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.



PROJECT TIMELINE

Skagit County and its consultant team (Kimley-Horn, Facet, Transpogroup, BERK, Cascadia, and MAKERS) have completed the following project tasks and milestones leading up to the release Draft Comprehensive Plan as shown in the table below. The table below also includes the tentative Planning Commission and Board of County Commissioners schedule for meetings and hearings on the Draft Comprehensive Plan.

Date	Project Task or Milestone
Feb 2024	Project Kickoff
Mar – May 2024	Growth Management Act and Countywide Planning Policy Gap Analysis

Feb – April 2024	Discussions With Cities Regarding Growth Allocations
May – July 2024	Data Collection and Analysis for Land Capacity, Employment, and Housing Needs Assessment
June – September 2024	Capital Facilities Coordination and Data Collection
May – August 2024	Transportation Data Collection and Analysis
July 2024	Planning Commission Workshop: Preliminary Draft Policies for Rural and Natural Resource Lands (with 30-day comment period)
August 2024	Planning Commission Workshop: Preliminary Draft Policies for Land Use, Housing, Economic Development (with 30-day comment period)
September 2024	Planning Commission Workshop: Preliminary Draft Policies for Transportation, Utilities, and Capital Facilities (with 30-day comment period)
October 2024	Planning Commission: Preliminary Draft Policies for Environment and Climate, Resiliency, and Greenhouse Gas Emissions Reductions (with 30-day comment period)
July – November 2024	Climate Element County Assets Analysis
July – December 2024	Climate Element Vulnerability Assessment
February 11, 2025	Planning Commission Briefing: Climate and Housing Elements
February 11, 2025	Board of County Commissioners Briefing: Climate and Housing Elements
February 13, 2025	Full Document Released to the Public (with 30-day comment period)
February 18, 2025	Planning Commission: Land Use, Transportation, Environment, Economic Development Elements
February 25, 2025	Planning Commission and Board of County Commissioners Joint Meeting
March 11, 2025	Comprehensive Plan Public Hearing (with 30-day comment period)
March 12, 2025	Comprehensive Plan Public Hearing (if needed)
April 8, 2025	Planning Commission Deliberations and Recommendations
April 15, 2025	Planning Commission Deliberations and Recommendations (if needed)
April 22, 2025	Planning Commission Critical Areas Ordinance and Development Regulations Briefing

May 6, 2025	Planning Commission Critical Areas Ordinance and Development Regulations Public Hearing
May 20, 2025	Planning Commission Critical Areas Ordinance and Development Regulations Deliberations
April 28, 2025	Board of County Commissioners Comprehensive Plan Briefing
May 27, 2025	Board of County Commissioners Comprehensive Plan Public Hearing
June 16, 2025	Board of County Commissioners Comprehensive Plan Public Hearing
June 23, 2025	Board of County Commissioners Comprehensive Plan Closed Record Public Hearing (Deliberations) and Possible Adoption

Capital Facilities Plan (CFP)

Skagit County updates the Capital Facilities Plan on an annual basis. As part of the Comprehensive Plan periodic update, the County and consultant team reviewed existing policies to confirm capital facilities can be provided population, housing, and employment growth allocated to the County through the Countywide Planning Policies. However, the actual Capital Facilities Plan is a separate document and was revised and completed through a separate process. The revised Capital Facilities Plan was completed in December 2024.

To see the updated 2025 Skagit County Capital Facilities Plan visit:

<https://www.skagitcounty.net/departments/planningandpermit/cfpmain.htm>.

The CFP is a document that supports the Capital Facilities and Utilities Elements of the Comprehensive Plan. The CFP is updated yearly by the County in coordination with utility and facility providers. The CFP contains existing conditions of each facility, levels of service, and a 6-year planned project and funding list. Many comprehensive plan elements rely on the findings of the CFP to support policy changes, development regulation changes, and land use changes. The CFP directly informs the Capital Facilities and Utilities Element. The Land Use Element uses the CFP to make critical policy revisions and review the feasibility of any proposed land use changes. The Climate Element reviews the CFP to determine any facilities at risk and any facilities that have planned improvements. In turn, the CFP is updated in coordination with facility providers in response to any proposed land use changes, development regulation changes, and new climate resiliency requirements.

COMMUNITY ENAGEMENT

The engagement report with all engagement results for the 2025 Periodic Comprehensive Plan Update can found at: <https://skagitcounty.net/2025cpa>

Engagement Event	Time	Description	Result
Community-Wide Survey	April – May 2024	Identify opportunities, assets, strengths and determine key focus areas.	717 Responses
Pop-Up Events	April – June 2024	Educate on the process, garner interest, sign up for project notifications	4 Events
Stakeholder Interviews	June-July 2024	Small policy-related discussion groups focusing on housing, environment, economic development and agriculture.	8 Interviews
Open Houses	June 2024	Educate on state requirements, collect climate related engagement, collect existing conditions from first-hand experiences.	3 Open houses
In Anacortes, Sedo-Woolley, and Concrete			120 Attendees (Total)
Rural & Natural Resource Lands Public Comment Period	July 23, 2024	Presented and preliminary draft policies at the Skagit County Planning Commission and then open comment period for approx. 30 days.	13 Comments Submitted
Land Use Housing Economic Development Public Comment Period	August 20, 2024	Presented and preliminary draft policies at the Skagit County Planning Commission and then open comment period for approx. 30 days.	23 Comments Submitted
Transportation Capital Facilities, and Utilities Public Comment Period	September 24, 2024	Presented and preliminary draft policies at the Skagit County Planning Commission and then open comment period for approx. 30 days.	10 Comments Submitted
Climate & Resiliency Environment Public Comment Period	October 22, 2024	Presented and preliminary draft policies at the Skagit County Planning Commission and then open comment period for approx. 30 days.	102 Comments Submitted
Climate Open House In Mount Vernon	October 1, 2024	Educate on climate and critical areas and collect feedback on proposed policies.	35 Attendees
Climate Community Survey	October 2024	Understand the extent of residents impacted by climate related hazards and possible solutions.	652 Responses

Climate Stakeholder Interviews	October 2024	Discussions focused on climate with various community groups.	7 Interviews
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A summary of community engagement includes:

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.

Pop-Up Events Skagit County staff attended multiple community events to reach residents notifying them of the start of the Comprehensive Plan, upcoming engagement opportunities, and providing information on key aspects of the periodic update to be aware. The pop-up events are used to garner future participation in engagement in hard-to-reach communities that may not have participated in the process otherwise. At most pop-up events attendees have the opportunities to sign up for the project newsletter to participate in passive involvement in the plan.

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. Another series of stakeholder interviews was held in October 2024. These specific interviews were meant to reach stakeholders interested or impacted from natural hazards and hazard mitigation.

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.

Community Group Presentations Skagit County staff were invited by the Community Action of Skagit County Latinx Advisory Committee to present a “Comprehensive Planning 101” workshop. The workshop provided an overview of the Growth Management Act (GMA) and introduced the basics of comprehensive planning. It also highlighted opportunities for community members and organizations to engage in the planning process and ensure their voices are heard in shaping how their communities grow. Additionally, Leadership Skagit invited staff to present to the 2025 class on the new GMA climate and resiliency planning goal, as well as Skagit County’s approach to meeting it.

Public Comment The Planning Commission reviewed preliminary draft policies by element between July and October 2024. Each Planning Commission meeting was accompanied by a 30-day comment period for the public to review and provide feedback.

Climate Open House Skagit County and the consulting team hosted a public open house in October 2024 to inform the community about the Climate Element. The goal of the event was to understand how residents are impacted by climate change and gather feedback on key policy

Climate Survey Skagit County and the consulting team developed and hosted a survey to inform the community about the Climate Element, learn more about how Skagit residents understand and are impacted by climate change, and gather input on key policy areas. The survey included six sections: Climate Awareness, Climate Concerns, Policies and Actions, Challenges and Opportunities, Your Connection to Skagit County, and Demographics.

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 204.

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.

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.

The Planning Commission recommendation is included in Exhibit of this report.
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In addition to the recommendations provided by staff, Planning Commission made six additional recommendations summarized below:

1. 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.

2. Revise the values and vision section of the Comprehensive Plan.
3. Adjust the Swinomish UGA zoning language.
4. Revise policies in the Utilities Element regarding conversion of energy resources from gas to electric sources.
5. 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.

CHANGES MADE AND RECOMMENDATION BY STAFF

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

Visit: <https://skagitcounty.net/2025cpa> to read any documents listed below.

Accompanying this staff report are 3 additional documents to review proposed changes to policies and the overall Comprehensive Plan. All available on the Skagit County website.

- A redlined version of the Skagit County Comprehensive Plan to see proposed changes from the previous plan.
- A clean version of the Skagit County Comprehensive to view the document as it would be adopted.
- The Appendices is intended to be adopted with the Comprehensive Plan to retain all existing condition data, engagement, data, and other applicable data used for the purpose of revising policies during the 2025 periodic update.

The following documents have been uploaded to the Skagit County website and include all additional analysis, data collection, engagement and policy review completed as part of the



periodic update.

The appendices include the following documents:

- Land Capacity Appendix

 - KH Memo

 - BERK LCA

 - Employment LCA

- Housing Appendix

 - HNA

- Engagement Appendix

 - Engagement Report

 - Engagement Report Appendix

 - Public Participation Plan

- Climate Appendix

 - Policy Gap analysis

 - Vulnerability Assessment

 - 2022 GHG Inventory