

Periodic Update Checklist for Fully-Planning Cities

Notice: This checklist has been updated with the new 2022-2023 GMA legislation. Rows that include new 2022-2023 legislative changes or updated Commerce guidance are marked with an orange dot ●. Statutory changes adopted since 2015 are emphasized in **highlighted** text to help identify new GMA requirements that may not have been addressed during the last periodic update or through other amendments outside of the required periodic update process. Additionally, amendments to the GMA, including those from the 2023 legislative session, are summarized in [this document](#) on Commerce's [GMA Laws and Rules webpage](#).

City

Staff contact, phone + email

Overview: This checklist is intended to help cities that are fully planning under the Growth Management Act (GMA) conduct the “periodic review and update” of **comprehensive plans** and **development regulations** required under [RCW 36.70A.130 \(5\)](#). This checklist identifies components of comprehensive plans and development regulations that may need updating to reflect the latest local conditions or to comply with GMA changes since the last periodic update cycle (2015-2018).

Local governments should review local comprehensive plan policies, countywide planning policies and multicounty planning policies (where applicable) to be consistent with the new requirements.

Checklist Instructions

With the most recent versions of your comprehensive plan and development regulations in hand, fill out each item in the checklist, answering the following questions:

Is this item addressed in your current plan or development regulations? If YES, fill in the form with citation(s) to where in the plan or regulation the item is addressed. Where possible, we recommend citing policy or goal numbers by element rather than page numbers, since these can change. If you have questions about the requirement, follow the hyperlinks to the relevant statutory provision or rules. If you still have questions, visit the Commerce [Periodic Update webpage](#) or contact the [Commerce planner assigned to your region](#).

Is amendment needed to meet current statute? Check YES to indicate a change to your plan will be needed. Check NO to indicate that the GMA requirement has already been met. Local updates may not be needed if the statute hasn't changed since your previous update, if your jurisdiction has kept current with required inventories, or if there haven't been many changes in local circumstances.

Use the "Notes" column to add additional information to note where your city may elect to work on or amend sections of your plan or development regulations, to call out sections that are not strictly required by the GMA, or to indicate if the item is not applicable to your jurisdiction.

Submit your checklist! This will be the first deliverable under your [periodic update grant](#).

PlanView system and instructions: Completed checklists can be submitted through Commerce's PlanView portal. The PlanView system allows cities and counties to submit and track amendments to comprehensive plans or development regulations online, with or without a user account. You can also submit via email: reviewteam@commerce.wa.gov Fill out and attach a [cover sheet](#), a copy of your submittal and this checklist. *Please be advised that Commerce is no longer accepting paper submittals.*

For further information about the submittal process, please visit Commerce's [Growth Management Act Laws and Rules webpage](#).

Need help?

Please visit Commerce's [periodic update webpage](#) for additional resources.

Or contact:

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Or, [your assigned regional planner](#)

Checklist Navigation

Section I: Comprehensive Plan	Section II: Development Regulations	Appendices
LAND USE	CRITICAL AREAS	APPENDIX A: HOUSING UNIT MINIMUMS PER POPULATION
HOUSING	ZONING CODE	APPENDIX B: ELEMENT UPDATES UNDER HB 1181
CAPITAL FACILITIES	SHORELINE MASTER PROGRAM	
UTILITIES	RESOURCE LANDS	
TRANSPORTATION	ESSENTIAL PUBLIC FACILITIES	
SHORELINE	SUBDIVISION CODE	
ESSENTIAL PUBLIC FACILITIES	STORMWATER	
TRIBAL PLANNING	ORGANIC MATERIALS MANAGEMENT	
CLIMATE CHANGE & RESILIENCY	IMPACT FEES	
ECONOMIC DEVELOPMENT	CONCURRENCY & TDM	
PARKS & RECREATION	TRIBAL PARTICIPATION	
OPTIONAL ELEMENTS	REGULATIONS FOR OPTIONAL ELEMENTS	
CONSISTENCY	PROJECT REVIEW PROCEDURES	
PUBLIC PARTICIPATION	PLAN & REGULATION AMENDMENTS	

Section I: Comprehensive Plan

Land Use Element

Consistent with countywide planning policies (CWPPs) and [RCW 36.70A.070\(1\)](#), amended in 2023

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p>Notice: 2021-2022 legislation ESSB 5593 includes changes to RCW 36.70A.130 regarding UGA size, patterns of development, suitability and infrastructure.</p> <p>Coordinate these efforts with your county.</p>	Yes	No	This change does not really impacts Skagit County, since CWPPS and cities effectively limit growth in UGA prior to annexation.	Completed: <input type="checkbox"/> Date: N/A
<p>a. The element integrates relevant county-wide planning policies into the local planning process, and ensures local goals and policies are consistent. For jurisdictions in the central Puget Sound region, the plan is consistent with applicable multicounty planning policies. RCW 36.70A.210 WAC 365-196-305</p> <p>Coordinate these efforts with your county.</p>	NA	NA	NA	Completed: <input type="checkbox"/> Date:
<p>b. A future land use map showing city limits and UGA boundaries. RCW 36.70A.070(1) amended in 2023 and RCW 36.70A.110(6), WAC 365-196-400(2)(d), WAC 365-196-405(2)(i)(ii).</p>	Not completely	Yes (Major)	changes will need to be made to address VMT and GHG reduction targets and to implement other changes in HB 1181	Completed: <input type="checkbox"/> Date:
<p>c. Consideration of urban planning approaches that increase physical activity and reduce per capita vehicle miles 25 traveled within the jurisdiction, but without increasing greenhouse gas emissions elsewhere in the state. RCW 36.70A.070(1) (amended in 2023) and WAC 365-196-405(2)(j).</p> <p>Additional resources: Commerce's Climate guidance, Transportation Efficient Communities' guidance, and the WA Department of Health Washington State Plan for Healthy Communities and Active Community Environment Toolkit</p>	Not completely	Yes (Major)	changes will need to be made to address VMT and GHG reduction targets and to implement other changes in HB 1181	Completed: <input type="checkbox"/> Date:

Section I: Comprehensive Plan

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
d. A consistent population projection throughout the plan which should be consistent with the jurisdiction's allocation of countywide population and housing needs. RCW 36.70A.115 , RCW 43.62.035 and WAC 365-196-405(f)	NA	NA	NA	Completed: <input type="checkbox"/> Date:
e. Estimates of population densities and building intensities based on future land uses and housing needs. RCW 36.70A.070(1) (amended in 2023), WAC 365-196-405(2)(i) <ul style="list-style-type: none"> For cities required to plan under the Buildable Lands Program, RCW 36.70A.215 amended in 2017, some jurisdictions may need to identify reasonable measures to reconcile inconsistencies. See Commerce's Buildable Lands Program page. 	Not completely	Yes (Major)	changes will need to be made to address VMT and GHG reduction targets and to implement other changes in HB 1181	Completed: <input type="checkbox"/> Date:
f. Provisions for protection of the quality and quantity of groundwater used for public water supplies. RCW 36.70A.070(1) (amended in 2023), WAC 365-196-405(1)(c) ; WAC 365-196-485(1)(d)	Yes	No		Completed: <input type="checkbox"/> Date:
g. Identification of lands useful for public purposes such as utility corridors, transportation corridors, landfills, sewage treatment facilities, storm water management facilities, recreation, schools and other public uses. RCW 36.70A.150 and WAC 365-196-340	NA	NA	NA	Completed: <input type="checkbox"/> Date:

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p>h. Identification of open space corridors and green spaces within and between urban growth areas, including lands useful for recreation, wildlife habitat, trails and connection of critical areas, and urban and community forests within the UGA. RCW 36.70A.070(1) amended in 2023, RCW 36.70A.160 and WAC 365-196-335</p>	No	Yes (minor)	Land Use, Parks and Recreation, and Natural Resources elements should be revised to address green space and urban forest language added to GMA.	Completed: <input type="checkbox"/> Date:
<p>i. If there is an airport within or adjacent to the city: policies, land use designations (and zoning) to discourage the siting of incompatible uses adjacent to general aviation airports. RCW 36.70A.510, RCW 36.70.547</p> <p>Note: The plan (and associated regulations) must be filed with the Aviation Division of WSDOT. WAC 365-196-455</p>	NA	NA	NA	Completed: <input type="checkbox"/> Date:
<p>j. Where applicable, a review of drainage, flooding and stormwater run-off in the area and nearby jurisdictions and provide guidance for corrective actions to mitigate or cleanse those discharges that pollute waters of the state. RCW 36.70A.070(1) (amended in 2023) and WAC 365-196-405(2)(e)</p> <p>Note: RCW 90.56.010(27) defines waters of the state.</p> <p>Additional resources: Commerce's climate guidance, Protect Puget Sound Watersheds, Building Cities in the Rain, Ecology Stormwater Manuals, Puget Sound Partnership Action Agenda</p>	No	No	Amendments adopted in 2023 and highlighted in yellow did not change stormwater and runoff requirements. Commerce guidance may dictate some changes, but this will be reviewed separately.	Completed: <input type="checkbox"/> Date:

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p>k. Policies to designate and protect critical areas including wetlands, fish and wildlife habitat protection areas, frequently flooded areas, critical aquifer recharge areas and geologically hazardous areas. In developing these policies, the city must have included the best available science (BAS) to protect the functions and values of critical areas, and give "special consideration" to conservation or protection measures necessary to preserve or enhance anadromous fisheries.</p> <p>RCW 36.70A.030(6), RCW 36.70A.172, WAC 365-190-080. Best Available Science: see WAC 365-195-900 through 925</p>	NA	NA	NA	Completed: <input type="checkbox"/> Date:
<p>l. If forest or agricultural lands of long-term commercial significance are designated inside a city: a program authorizing Transfer (or Purchase) of Development Rights. RCW 36.70A.060(4), RCW 36.70A.170</p>	NA	NA	NA	Completed: <input type="checkbox"/> Date:
<p>m. If there is a Military Base within or adjacent to the jurisdiction employing 100 or more personnel: policies, land use designations, (and consistent zoning) to discourage the siting of incompatible uses adjacent to military bases. RCW 36.70A.530(3), WAC 365-196-475</p>	NA	NA	NA	Completed: <input type="checkbox"/> Date:
<p>n. New section RCW 36.70A.142 (2022), HB 1799: Development regulations newly developed, updated, or amended after January 1, 2025 allow for the siting of organic materials (OM) management facilities as identified in local solid waste management plans (SWMP) to meet OM reduction and diversion goals. Siting must meet criteria described in RCW 70A.205.040(3). See also RCW 36.70.330. For applicability, see RCW 70A.205.540.</p>	Yes	Yes (minor)	The current code prohibits commercial composting facilities throughout the City. This needs to be changed to allow facilities in industrial areas IF the site is necessary to meet capacity needs of a management plan adopted by the County. Unlikely this will result in allowing these facilities in Burlington.	Completed: <input type="checkbox"/> Date:

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p>o. Give special consideration to achieving environmental justice in goals and policies, including efforts to avoid creating or worsening environmental health disparities. RCW 36.70A.070(1) amended in 2023.</p>	No	Yes (minor)	Changes need to be made to address environmental health/justice	Completed: <input type="checkbox"/> Date:
<p>p. The land use element must reduce and mitigate the risk to lives and property posed by wildfires by using land use planning tools and through wildfire preparedness and fire adaptation measures. RCW 36.70A.070(1) amended in 2023.</p> <p>See also: International Wildland-Urban Interface Code</p>	Yes – Burlington Hill Special Management Area. Also addressed in fire code	Yes (minor)	Should added supporting language and additional policies/code so it's clear we have addressed this specific legislative change	Completed: <input type="checkbox"/> Date:

Housing Element

New 2021 and 2022 legislation substantially amended the housing-related provisions of the Growth Management Act (GMA), [RCW 36.70A.070 \(2\)](#). Local governments should review local comprehensive plan policies and countywide planning policies to be consistent with the updated requirements. Please refer to [Commerce’s housing webpage](#) for further information. See also [Appendix A](#) of this checklist for the new 2023 minimum housing unit requirements per city population.

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p>Notice: For more information about what these housing element requirements involve and what Commerce staff will be reviewing for, please see the Expanded Housing Checklist located on the Updating GMA Housing Elements webpage.</p>	NA – addressed separately in housing checklist	NA – addressed separately in housing checklist	NA	
<p>a. Goals, policies and objectives for:</p> <ul style="list-style-type: none"> the preservation, improvement and development of housing RCW 36.70A.070(2)(b); moderate density housing options including, but not limited to, duplexes, triplexes, and townhomes, within an urban growth area boundary, RCW 36.70A.070(2)(b) and WAC 365-196-410(2)(a); and Consideration of housing locations in relation to employment locations and the role of ADUs. RCW 36.70A.070(2)(d) new in 2021 <p>Notice: These items were separately listed in the previous version of the checklist. No content was changed.</p>	Yes	No	Moderate density housing is allowed in all Burlington residential and mixed-use zones	Completed: <input type="checkbox"/> Date:
<p>b. An inventory and analysis of existing and projected housing needs over the planning period, by income band, consistent with the jurisdiction’s share of countywide housing need, as provided by Commerce. RCW 36.70A.070(2)(a) amended in 2021, WAC 365-196-410(2)(b) and (c)</p>	Yes	Yes (Major)	Changes required to reference housing allocations – new data	Completed: <input type="checkbox"/> Date:

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
c. Identification of capacity of land for housing including, but not limited to, government-assisted housing, housing for moderate, low, very low, and extremely low income households, manufactured housing, multifamily housing, group homes, foster care facilities, emergency housing, emergency shelters and permanent supportive housing. RCW 36.70A.070(2)(c) amended in 2021, WAC 365-196-410(e) and (f).	Yes	No	Provisions are included for all listed housing types	Completed: <input type="checkbox"/> Date:
d. Adequate provisions for existing and projected housing needs for all economic segments of the community, including documenting barriers and actions needed to achieve housing availability. RCW 36.70A.070(2)(d) amended in 2021, WAC 365-196-010(g)(ii) , WAC 365-196-300(f) , WAC 365-196-410 and see Commerce’s Housing Action Plan (HAP) guidance: Guidance for Developing a Housing Action Plan .	Yes	No	Addressed – seen Housing Element and Housing Chapter in Volume II of comp plan	Completed: <input type="checkbox"/> Date:
e. Identify local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing, including: <ul style="list-style-type: none"> • Zoning that may have a discriminatory effect; • Disinvestment; and • Infrastructure availability RCW 36.70A.070(2)(e) new in 2021	No	Yes (minor)	Amendments required to review potential impacts and add polices/regulations to address	Completed: <input type="checkbox"/> Date:
f. Establish policies and regulations to address and begin to undo racially disparate impacts, displacement, and exclusion in housing caused by local policies, plans, and actions. RCW 36.70A.070(2)(f) new in 2021	No	Yes (minor)	Amendments required to review potential impacts and add polices/regulations to address	Completed: <input type="checkbox"/> Date:

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p><i>g. Identification of areas that may be at higher risk of displacement from market forces that occur with changes to zoning development regulations and capital investments.</i> <u>RCW 36.70A.070(2)(g) new in 2021</u></p> <p><i>Establish anti-displacement policies, with consideration given to the preservation of historical and cultural communities as well as investments in low, very low, extremely low, and moderate-income housing; equitable development initiatives; inclusionary zoning; community planning requirements; tenant protections; land disposition policies; and consideration of land that may be used for affordable housing.</i> <u>RCW 36.70A.070(2)(h) new in 2021</u></p> <p><i>See also: Support Materials for Racially Disparate Impacts, Exclusion and Displacement Work</i></p>	No	Yes (minor)	<p><i>Changes will likely be limited to analysis and documentation. Burlington directs most housing growth to formerly commercial areas where little existing housing is located, likely resulting in little if any displacement. Analysis and documentation required</i></p>	<p>Completed: <input type="checkbox"/></p> <p>Date:</p>

Capital Facilities Plan (CFP) Element

To serve as a check on the practicality of achieving other elements of the plan, covering all capital facilities planned, provided and paid for by public entities including local government and special districts, etc. including water systems, sanitary sewer systems, storm water facilities, schools, parks and recreational facilities, police and fire protection facilities. Capital expenditures from park and recreation elements, if separate, should be included in the CFP Element. The CFP Element must be consistent with CWPPs, and [RCW 36.70A.070\(3\)](#) amended in 2023. Changes made to this element through [HB 1181](#) (climate change and resiliency) are not required, although jurisdictions should make a good faith effort to incorporate these items to be consistent with the new legislation.

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
a. Policies or procedures to ensure capital budget decisions are in conformity with the comprehensive plan. RCW 36.70A.120	NA	NA	NA	Completed: <input type="checkbox"/> Date:
b. An inventory of existing capital facilities owned by public entities, including green infrastructure. RCW 36.70A.070(3)(a) amended in 2023 and WAC 365-196-415(1)(a)	No	Yes (minor)	Green infrastructure references/explanation required	Completed: <input type="checkbox"/> Date:
c. A forecast of needed capital facilities. RCW 36.70A.070(3)(b) and WAC 365-196-415(1)(b) Note: The forecast of future need should be based on projected population and adopted levels of service (LOS) over the planning period.	NA	NA	NA	Completed: <input type="checkbox"/> Date:
d. Proposed locations and capacities of expanded or new capital facilities. RCW 36.70A.070(3)(c) and WAC 365-196-415(1)(c) and (3)(c) Infrastructure investments should consider equity and plan for any potential displacement impacts.	NA	NA	NA	Completed: <input type="checkbox"/> Date:
e. A six-year plan (at minimum) that will finance such capital facilities within projected funding capacities and identify sources of public money to finance planned capital facilities. RCW 36.70A.070(3)(d) , RCW 36.70A.120 , WAC 365-196-415(1)(d)	NA	NA	NA	Completed: <input type="checkbox"/> Date:

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
f. A policy or procedure to reassess the Land Use Element if probable funding falls short of meeting existing needs. RCW 36.70A.070(3)(e) WAC 365-196-415(2)(d) Note: park and recreation facilities shall be included in the capital facilities plan element.	NA	NA	NA	Completed: <input type="checkbox"/> Date:
g. If impact fees are collected: identification of public facilities on which money is to be spent. RCW 82.02.050(5) and WAC 365-196-850(3)	NA	NA	NA	Completed: <input type="checkbox"/> Date:
h. Identify and include information about all public entities, including special purpose districts that own capital facilities. RCW 36.70A.070 (3) amended in 2023	Yes	No	Change is just a protection from being challenged if another agency fails to provide information	Completed: <input type="checkbox"/> Date:

Utilities Element

Consistent with relevant CWPPs and [RCW 36.70A.070 \(4\)](#) amended in 2023. Utilities include, but are not limited to: sanitary sewer systems, water lines, fire suppression, electrical lines, telecommunication lines, and natural gas lines. Changes made to this element through [HB 1181](#) (climate change and resiliency) are not required, although jurisdictions should make a good faith effort to incorporate these items to be consistent with the new legislation.

a. The general location, proposed location and capacity of all existing and proposed utilities, to include telecommunications. RCW 36.70A.070(4)(a) amended in 2023 and WAC 365-196-420	Yes	No	Change is just a protection from being challenged if a utility fails to provide information	Completed: <input type="checkbox"/> Date:
b. Identify and include information and contact information about all public entities, including special purpose districts that own utility systems. RCW 36.70A.070 (4)(b) new in 2023	Yes	No	Information is included and we have policies to compel their cooperation	Completed: <input type="checkbox"/> Date:

Transportation Element

Consistent with relevant CWPPs and [RCW 36.70A.070 \(6\)](#) amended in 2023 by HB 1181. See also the new [climate element](#) below for jurisdictional requirements.

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
a. An inventory of air, water and ground transportation facilities and services, including transit alignments, active transportation facilities, state-owned transportation facilities and general aviation airports. RCW 36.70A.070(6)(a)(iii)(A) amended in 2023 and WAC 365-196-430(2)(c)	Yes	No	Standard inventory requirements	Completed: <input type="checkbox"/> Date:
b. Adopted multimodal levels of service standards for all locally owned arterials, locally and regionally operated transit routes that serve UGAs, state-owned or operated transit routes that serve urban areas if the department of transportation has prepared such standards, and active transportation facilities to serve as a gauge to judge performance of the system and success in helping to achieve environmental justice. RCW 36.70A.070(6)(a)(iii)(B) and (C) amended in 2023, WAC 365-196-430	No	Yes (Major)	Required to update to include multimodal LOS	Completed: <input type="checkbox"/> Date:
c. Identification of specific actions to bring transportation facilities and services to established multimodal LOS. RCW 36.70A.070(6)(a)(iii)(D) amended in 2023, WAC 365-196-430	No	Yes (Major)	Required to update to include multimodal LOS	Completed: <input type="checkbox"/> Date:
d. A forecast of multimodal transportation for at least 10 years including land use assumptions used in estimating travel. RCW 36.70A.070(6)(a)(i) , RCW 36.70A.070 (6)(a)(iii)(E) amended in 2023, WAC 365-196-430(2)(f)	No	Yes (Major)	Required to update to include multimodal LOS	Completed: <input type="checkbox"/> Date:

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p>e. A projection of state and local system needs to equitably meet current and future demand and equitably implement the multimodal network. RCW 36.70A.070(6)(a)(iii)(F) amended in 2023, WAC 365-196-430(1)(c)(vi) and RCW 47.06</p>	No	Yes (Major)	Required to update to include multimodal LOS	Completed: <input type="checkbox"/> Date:
<p>f. A transition plan for transportation as required in Title II of ADA. Perform self-evaluations of current facilities and develop a program access plan to address deficiencies and achieve the identification of physical obstacles, establish methods, perform modifications and identify leadership roles. RCW 36.70A.070(6)(a)(iii)(G) new in 2023.</p>	No	Yes (minor)	<i>This will need to be included</i>	Completed: <input type="checkbox"/> Date:
<p>g. An active transportation component to include collaborative efforts to identify and designate planned improvements for active transportation facilities and corridors that address and encourage enhanced community access and promote healthy lifestyles. RCW 36.70A.070(6)(a)(vii) amended in 2023, WAC 365-196-430(2)(j)</p>	Yes	No	Changes not required but council and PC have requested additional active transportation planning so changes will be made	Completed: <input type="checkbox"/> Date:
<p>h. A description of any existing and planned transportation demand management (TDM) strategies, such as HOV lanes or subsidy programs, parking policies, etc. RCW 36.70A.070(6)(a)(vi) and WAC 365-196-430(2)(i)(i)</p>	NA	NA	NA	Completed: <input type="checkbox"/> Date:
<p>i. An analysis of future funding capability to judge needs against probable funding resources. RCW 36.70A.070(6)(a)(iv)(A), WAC 365-196-430(2)(k)(iv)</p>	NA	NA	NA	Completed: <input type="checkbox"/> Date:

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
j. A multi-year financing plan based on needs identified in the comprehensive plan, the appropriate parts of which serve as the basis for the 6-year street, road or transit program. RCW 36.70A.070(6)(a)(iv)(B) and RCW 35.77.010 , WAC 365-196-430(2)(k)(ii)	NA	NA	NA	Completed: <input type="checkbox"/> Date:
k. If probable funding falls short of meeting identified needs of the transportation system, including state transportation facilities, a discussion of how additional funds will be raised, or how land use assumptions will be reassessed to ensure that LOS standards will be met. RCW 36.70A.070(6)(a)(iv)(C) amended in 2023, WAC 365-196-430(2)(l)(iii)	No	Yes (Major)	Required to update to include multimodal LOS	Completed: <input type="checkbox"/> Date:
l. A description of intergovernmental coordination efforts, including an assessment of the impacts of the transportation plan and land use assumptions on the transportation systems of adjacent jurisdictions and how it is consistent with the regional transportation plan. RCW 36.70A.070(6)(a)(v) ; WAC 365-196-430(1)(e) and 430(2)(a)(iii)	NA	NA	NA	Completed: <input type="checkbox"/> Date:

Shoreline

For shorelines of the state, the goals and policies of the shoreline management act as set forth in [RCW 90.58.020](#) are added as one of the goals of the Growth Management Act (GMA) as set forth in [RCW 36.70A.480](#). The goals and policies of a shoreline master program for a county or city approved under [RCW 90.58](#) shall be considered an element of the county or city's comprehensive plan.

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
a. The policies, goals, and provisions of RCW 90.58 and applicable guidelines shall be the sole basis for determining compliance of a shoreline master program with this chapter except as the shoreline master program is required to comply with the internal consistency provisions of RCW 36.70A.070 , 36.70A.040(4) , 35.63.125 , 35A.63.105 , 36.70A.480	NA			Completed: <input type="checkbox"/> Date:
b. Shoreline master programs shall provide a level of protection to critical areas located within shorelines of the state that assures no net loss of shoreline ecological functions necessary to sustain shoreline natural resources as defined by department of ecology guidelines adopted pursuant to RCW 90.58.060 .	NA			Completed: <input type="checkbox"/> Date:
c. Shorelines of the state shall not be considered critical areas under this chapter except to the extent that specific areas located within shorelines of the state qualify for critical area designation based on the definition of critical areas provided by RCW 36.70A.030(5) and have been designated as such by a local government pursuant to RCW 36.70A.060(2) .	NA			Completed: <input type="checkbox"/> Date:

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
d. If a local jurisdiction's master program does not include land necessary for buffers for critical areas that occur within shorelines of the state, as authorized by RCW 90.58.030(2)(f) , then the local jurisdiction shall continue to regulate those critical areas and their required buffers pursuant to RCW 36.70A.060(2) .	NA			Completed: <input type="checkbox"/> Date:

Provisions for siting essential public facilities (EPFs)

Consistent with CWPPs and [RCW 36.70A.200](#), amended 2021. This section can be included in the Capital Facilities Element, Land Use Element or in its own element. Sometimes the identification and siting process for EPFs is part of the CWPPs.

a. A process or criteria for identifying and siting essential public facilities (EPFs). RCW 36.70A.200 and WAC 365-196-550(1) Notes: RCW 36.70A.200 , amended 2021 regarding reentry and rehabilitation facilities. EPFs are defined in RCW 36.70A.200 . Regional transit authority facilities are included in the list of essential public facilities.	Yes (in code for EPFs)	No		Completed: <input type="checkbox"/> Date:
b. Policies or procedures that ensure the comprehensive plan does not preclude the siting of EPFs. RCW 36.70A.200(5) Note: If the EPF siting process is in the CWPPs, this policy may be contained in the comprehensive plan as well. WAC 365-196-550(3)	NA	NA	NA	Completed: <input type="checkbox"/> Date:

● Tribal Participation in Planning new in 2022 (see [HB 1717](#))

A federally recognized Indian tribe may voluntarily choose (opt-in) to participate in the local and regional planning processes.

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
● a. Mutually agreeable memorandum of agreement between local governments and tribes in regard to collaboration and participation in the planning process unless otherwise agreed at the end of a mediation period. RCW 36.70A.040(8)(a) new in 2022, RCW 36.70A.190 new in 2022	No	No	Statue is only triggered if a tribe requests to participate. No requests. If we were to receive a request a change would be required	Completed: <input type="checkbox"/> Date:
● b. <i>Port elements</i> , if adopted, are developed collaboratively between the city, the applicable port and the applicable tribe(s), which shall comply with RCW 36.70A.040(8) . RCW 36.70A.085 amended in 2022	No	No	Burlington not required to include a port element	Completed: <input type="checkbox"/> Date:
● c. <i>Urban Growth Areas</i> : counties and cities coordinate planning efforts for any areas planned for urban growth with applicable tribe(s). RCW 36.70A.110(1) amended 2022, RCW 36.70A.040(8)	No	No	This is a county/SCOG issue	Completed: <input type="checkbox"/> Date:

Climate Change and Resiliency

New in 2023, see [HB 1181](#). RCW and WAC updates are forthcoming.

A new required element for comprehensive plans and new goal of the GMA. Designed to reduce greenhouse gas (GHG) emissions, plan for resiliency and support environmental justice. Climate elements must maximize economic, environmental and social co-benefits and prioritize environmental justice in order to avoid worsening environmental health disparities. A climate element can take the form of a single comprehensive plan chapter or be integrated into several chapters/elements such as housing, transportation and land use. Visit [Commerce’s Climate Program](#) webpage for further guidance, grants, tools and staff contacts.

These requirements for GHG emission reductions and resiliency apply to the following counties and their cities with a population greater than 6,000 as of April 1, 2021. Please also review [Appendix B](#) for requirements due in the upcoming [periodic update](#).

- June 30, 2025 Deadline: Clark, Skagit, Thurston, Whatcom
- June 30, 2026 Deadline: Benton, Franklin, Spokane
- June 30, 2029 Deadline: These jurisdictions are only required to update two elements this cycle – the transportation and climate elements

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p>a. Greenhouse gas emissions reduction sub-element: must include goals and policies to reduce emissions and vehicle miles traveled. This sub-element is mandatory for the state’s largest and fastest-growing counties and the cities within those counties. RCW 36.70A.070(9) new in 2023</p>	No	Yes (Major)		Completed: <input type="checkbox"/> Date:
<p><i>b. Resiliency sub-element: must include goals and polices to improve climate preparedness, response and recovery efforts. This is mandatory for all counties and cities fully planning under the GMA and encouraged for others. RCW 36.70A.070(9) new in 2023</i></p>	No	Yes (minor)		Completed: <input type="checkbox"/> Date:

Future required elements: pending state funding

As of 2022, these elements have not received state funding to aid local jurisdictions in implementation. Therefore, these elements are not required to be added to comprehensive plans at this time. Commerce encourages jurisdictions to begin planning for these elements, pending the future mandate.

	In Current Plan? Yes/No If yes, cite section	Notes	
<p>Economic Development</p> <p>Although included in RCW 36.70A.070 “mandatory elements” an economic development element is not currently required because funding was not provided to assist in developing local elements when this element was added to the GMA. However, provisions for economic growth, vitality, and a high quality of life are important, and supporting strategies should be integrated with the land use, housing, utilities, and transportation elements. RCW 36.70A.070(7) amended in 2017</p>	Yes	Yes	Completed: <input type="checkbox"/> Date:
<p>Parks and Recreation</p> <p><i>Implements and is consistent with the capital facilities plan. Include a ten-year demand estimate, evaluation of service and facilities needs and evaluation of tree canopy coverage within UGAs. RCW 36.70A.070(8) amended in 2023</i></p> <p>Although included in RCW 36.70A.070 “mandatory elements” a parks and recreation element is not currently required because the state did not provide funding to assist in developing local elements when this provision was added to the GMA. However, parks, recreation and open space planning are GMA goals, and it is important to plan for and fund these facilities.</p>	No	<i>Tree canopy analysis may be included in updated plan, along with policies or other changes to increase tree cover</i>	Completed: <input type="checkbox"/> Date:

Optional Elements

Pursuant to [RCW 36.70A.080](#), a comprehensive plan may include additional elements, items, or studies dealing with other subjects relating to the physical development within its jurisdiction, including, but not limited to:

	In Current Plan? Yes/No If yes, cite section	Notes	
Sub-Area Plans		Provisions for "Cascade Subarea" under development. Plan currently includes "priority growth areas" and "special management areas" which function as overlays.	Completed: <input type="checkbox"/> Date:
Conservation		Addressed in natural resource element	Completed: <input type="checkbox"/> Date:
Recreation		Included in Parks and Recreation Element	Completed: <input type="checkbox"/> Date:
Solar Energy		Solar energy and energy conservation addressed in natural resources element	Completed: <input type="checkbox"/> Date:

Consistency is required by the GMA

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
a. All plan elements must be consistent with relevant county-wide planning policies (CWPPs) and, where applicable, multi-county planning policies (MPPs), and the GMA. RCW 36.70A.100 and 210 , WAC 365-196-305 ; 400(2)(c) ; 510 and 520	Yes	Yes	CWPPS are being updated – Burlington comp plan will need to be updated for consistency. Burlington comp plan includes goals and policies to ensure consistency with regional plans	Completed: <input type="checkbox"/> Date:
b. All plan elements must be consistent with each other. RCW 36.70A.070 (preamble) and WAC 365-197-040	Yes	Yes	If plan is updated a review will be necessary to ensure internal consistency. Plan includes goals and policies that require internal consistency	Completed: <input type="checkbox"/> Date:
c. The plan must be coordinated with the plans of adjacent jurisdictions. RCW 36.70A.100 and WAC 365-196-520	Yes	Yes	Through our regional coordination process plan will be revised for consistency with updated plans of neighboring jurisdictions	Completed: <input type="checkbox"/> Date:

Public Participation

a. Plan ensures public participation in the comprehensive planning process. RCW 36.70A.020(11) , .035 , and .140 , WAC 365-196-600(3) provide possible public participation choices.	Yes	No	Public participation provisions are included in the implementation element. A public participation plan has been adopted for the comp plan update.	Completed: <input type="checkbox"/> Date:
b. If the process for making amendments is included in the comprehensive plan: <ul style="list-style-type: none"> • The plan provides that amendments are to be considered no more often than once a year, not including the exceptions described in RCW 36.70A.130(2), WAC365-196-640 • The plan sets out a procedure for adopting emergency amendments and defines emergency. RCW 36.70A.130(2)(b) and RCW 	Yes	No	Implementation element includes policies for compliance with these requirements	Completed: <input type="checkbox"/> Date:

Consistency is required by the GMA

<u>36.70A.390, WAC 365-196-650(4)</u>	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p>e. Plan or program for monitoring how well comprehensive plan policies, development regulations, and other implementation techniques are achieving the comp plan's goals and the goals of the GMA. WAC 365-196-660 discusses a potential review of growth management implementation on a systematic basis.</p> <p>New 2021-2022 legislation HB 1241 provides that those jurisdictions with a periodic update due in 2024 have until December 31, 2024 to submit. The legislation also changed the update cycle to every ten years after the 2024-2027 cycle. Jurisdictions that meet the new criteria described in RCW 36.70A.130(9) will be required to submit an implementation progress report five years after the review and revision of their comprehensive plan.</p>	NA	NA	Burlington has a June, 2025 deadline.	Completed: <input type="checkbox"/> Date:
<p>d. Considerations for preserving property rights. Local governments must evaluate proposed regulatory or administrative actions to assure that such actions do not result in an unconstitutional taking of private property. RCW 36.70A.370. For further guidance see the 2018 Advisory Memo on the Unconstitutional Taking of Private Property</p>	NA	NA	NA	Completed: <input type="checkbox"/> Date:
<p>e. Encourage the involvement of citizens in the planning process, including the participation of vulnerable populations and overburdened communities, and ensure coordination between communities and jurisdictions to reconcile conflicts. HB 1181 (2023) revised RCW</p>	No	Yes (minor)	Need changes to comp plan to address this.	Completed: <input type="checkbox"/> Date:

Consistency is required by the GMA

[36.70A.020](#) Planning Goals for inclusion of vulnerable populations and overburdened communities. [RCW 36.70A.035](#) Public Participation was not amended under HB 1181.

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Section II: Development Regulations

Must be consistent with and implement the comprehensive plan. [RCW 36.70A.040](#), [WAC 365-196-800](#) and [810](#)

Critical Areas

Regulations protecting critical areas are required by [RCW 36.70A.060\(2\)](#), [RCW 36.70A.172\(1\)](#), [WAC 365-190-080](#) and [WAC 365-195-900](#) through [925](#).

Please visit Commerce’s [Critical Areas webpage](#) for resources and to complete the [Critical Areas Checklist](#). Critical areas regulations must be reviewed and updated, as necessary, to incorporate legislative changes and best available science. Jurisdictions using periodic update grant funds to update critical areas regulations must submit the critical areas checklist as a first deliverable, in addition to this periodic update checklist.

Zoning Code

Note: Please review the new 2023 housing laws in the [Washington State Housing Laws of 2019 through 2023](#) guidance, on Commerce’s [Planning for Housing](#) webpage and [Appendix A](#) of this checklist.

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p>Notice: For more information about housing regulatory changes regarding supportive housing types, see Supportive Housing Types Review Checklist on the Updating GMA Housing Elements webpage. And for additional information on middle housing and ADU regulations, see the Middle Housing webpage.</p>				
<p>a. Zoning designations are consistent and implement land use designations that accommodate future housing needs by income bracket as allocated through the countywide planning process. (RCW 36.70A.070(2)(c) - amended in 2021 (HB 1220))</p>	No	Yes	Will require work with regional planning group to adopt and implement housing allocations	Completed: <input type="checkbox"/> Date:
<p>b. Permanent supportive housing or transitional housing must be allowed where residences and hotels are allowed. RCW 36.70A.390 new in 2021, (HB 1220 sections 3-5) “permanent supportive housing” is defined in RCW 36.70A.030; “transitional housing” is defined in RCW 84.36.043(2)(c)</p>	Yes	No	Addressed through last update	Completed: <input type="checkbox"/> Date:

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
c. Indoor emergency shelters and indoor emergency housing must be allowed in any zones in which hotels are allowed, except in cities that have adopted an ordinance authorizing indoor emergency shelters and indoor emergency housing in a majority of zones within one mile of transit. RCW 35A.21.430 amended in 2021, RCW 35.21.683 , amended in 2021, (HB 1220 sections 3-5) "emergency housing" is defined in RCW 84.36.043(2)(b)	Yes	No	Addressed through last update	Completed: <input type="checkbox"/> Date:
d. The number of unrelated persons that occupy a household or dwelling unit except as provided in state law, for short-term rentals, or occupant load per square foot shall not be regulated or limited by cities. (HB 5235), RCW 35.21.682 new in 2021, RCW 35A.21.314 new in 2022, RCW 36.01.227 new in 2021	Yes	No	Burlington does not have a limit on unrelated persons or purposes of regulating housing types.	Completed: <input type="checkbox"/> Date:
e. Limitations on the amount of parking local governments can require for low-income, senior, disabled and market-rate housing units located near high-quality transit service. RCW 36.70A.620 amended in 2020 and RCW 36.70A.600 amended in 2019	Yes	No	Burlington does not differentiate between housing types based on occupant income or source of income. Comp plan includes policies explicitly stating that we do not use income for zoning purposes	Completed: <input type="checkbox"/> Date:
f. Family day care providers are allowed in all residential dwellings located in areas zoned for residential or commercial RCW 36.70A.450 . Review RCW 43.216.010 for definition of family day care provider and WAC 365.196.865 for more information.	NA	NA		Completed: <input type="checkbox"/> Date:

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p>g. Manufactured housing is regulated the same as site built housing. RCW 35.21.684 amended in 2019, RCW 35.63.160, RCW 35A.21.312 amended in 2019 and RCW 36.01.225 amended in 2019. A local government may require that manufactured homes: (1) are new, (2) are set on a permanent foundation, and (3) comply with local design standards applicable to other homes in the neighborhood, but may not discriminate against consumer choice in housing.</p> <p>See: National Manufactured Housing Construction and Safety Standards Act of 1974</p>	Yes	No	Burlington treats manufactured housing the same as site built housing	Completed: <input type="checkbox"/> Date:
<p>h. Accessory dwelling units: cities (and counties) must adopt or amend by ordinance, and incorporate into their development regulations, zoning regulations and other official controls. RCW 36.70A.680 amended in 2023, RCW 36.70A.681 amended in 2023, RCW 36.70A.696 amended in 2023, RCW 36.70A.697 amended in 2020, RCW 36.70A.698 amended in 2020, RCW 36.70A.699 amended in 2020</p> <p>See new Commerce guidance on the Middle Housing webpage</p>	Yes	Yes	Minor changes will be required for consistency with current state ADU requirements. Largely addressed through last update. Major changes not required	Completed: <input type="checkbox"/> Date:
<p>i. Residential structures occupied by persons with handicaps, and group care for children that meets the definition of “familial status” are regulated the same as a similar residential structure occupied by a family or other unrelated individuals. No city or county planning under the GMA may enact or maintain ordinances, development regulations, or administrative practices which treat a residential structure occupied by persons with handicaps differently than a similar residential structure occupied by a family or other unrelated individuals. RCW 36.70A.410, RCW 70.128.140 and 150, RCW 49.60.222-225 and WAC 365-196-860</p>	NA	NA	NA	Completed: <input type="checkbox"/> Date:

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p>j. Affordable housing programs enacted or expanded under RCW 36.70A.540 amended in 2022 comply with the requirements of this section. Examples of such programs may include: density bonuses within urban growth areas, height and bulk bonuses, fee waivers or exemptions, parking reductions, expedited permitting conditioned on provision of low-income housing units, or mixed-use projects. WAC 365-196-300</p> <p>See also RCW 36.70A.545 and WAC 365-196-410(2)(e)(i)</p> <p>“affordable housing” is defined in RCW 84.14.010</p> <p>Review RCW 36.70A.620 amended in 2020, for minimum residential parking requirements.</p>	Some	Yes (minor)	PC and CC have asked for more incentives to be considered, including fee waivers and other bonuses. Included in update scope	Completed: <input type="checkbox"/> Date:
<p>k. Limitations on regulating: outdoor encampments, safe parking efforts, indoor overnight shelters and temporary small houses on property owned or controlled by a religious organization. RCW 36.01.290 amended in 2020</p>	No	Yes (minor)	Need to review and perhaps create a religious land use exception process. Changes may not be required but more research needed	Completed: <input type="checkbox"/> Date:
<p>l. Regulations discourage incompatible uses around general aviation airports. RCW 36.70.547 and WAC 365-196-455. Incompatible uses include: high population intensity uses such as schools, community centers, tall structures, and hazardous wildlife attractants such as solid waste disposal sites, wastewater or stormwater treatment facilities, or stockyards. For more guidance, see WSDOT’s Aviation Land Use Compatibility Program.</p>	NA	NA	NA	Completed: <input type="checkbox"/> Date:

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
m. If a U.S. Department of Defense (DoD) military base employing 100 or more personnel is within or adjacent to the jurisdiction, zoning should discourage the siting of incompatible uses adjacent to military base. RCW 36.70A.530(3) and WAC 365-196-475 . Visit Military One Source to locate any bases in your area and help make determination of applicability. If applicable, inform the commander of the base regarding amendments to the comprehensive plan and development regulations on lands adjacent to the base.	NA	NA	NA	Completed: <input type="checkbox"/> Date:
n. Electric vehicle infrastructure (jurisdiction specified: adjacent to Interstates 5, 90, 405 or state route 520 and other criteria) must be allowed as a use in all areas except those zoned for residential, resource use or critical areas. RCW 36.70A.695	Yes	No	Allowed everywhere	Completed: <input type="checkbox"/> Date:

Shoreline Master Program
Consistent with [RCW 90.58](#) Shoreline Management Act of 1971

a. Zoning designations are consistent with Shoreline Master Program (SMP) environmental designations. RCW 36.70A.480	NA	NA	NA	Completed: <input type="checkbox"/> Date:
b. If updated to meet RCW 36.70A.480 (2010), SMP regulations provide protection to critical areas in shorelines that is at least equal to the protection provided to critical areas by the critical areas ordinance. RCW 36.70A.480(4) and RCW 90.58.090(4) See Ecology's shoreline planners' toolbox for the SMP Checklist and other resources and Ecology's Shoreline Master Programs Handbook webpage	NA	NA	NA	Completed: <input type="checkbox"/> Date:

Resource Lands

Defined in [RCW 36.70A.030\(3\), \(12\) and \(17\)](#) and consistent with [RCW 36.70A.060](#) and [RCW 36.70A.170](#)

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
a. Zoning is consistent with natural resource lands designations in the comprehensive plan and conserves natural resource lands. RCW 36.70A.060(3) , WAC 365-196-815 and WAC 365-190-020(6) . Consider innovative zoning techniques to conserve agricultural lands of long-term significance RCW 36.70A.177(2) . See also WAC 365-196-815(3) for examples of innovative zoning techniques.	NA	NA	NA	Completed: <input type="checkbox"/> Date:
b. Regulations to assure that use of lands adjacent to natural resource lands does not interfere with natural resource production. RCW 36.70A.060(1)(a) and WAC 365-190-040 Regulations require notice on all development permits and plats within 500 feet of designated natural resource lands that the property is within or near a designated natural resource land on which a variety of commercial activities may occur that are regulations to implement comprehensive plan	NA	NA	NA	Completed: <input type="checkbox"/> Date:
c. For designated agricultural land, regulations encourage nonagricultural uses to be limited to lands with poor soils or otherwise not suitable for agricultural purposes. Accessory uses should be located, designed and operated to support the continuation of agricultural uses. RCW 36.70A.177(3)(b)	NA	NA	NA	Completed: <input type="checkbox"/> Date:
d. Designate mineral lands and associated regulations as required by RCW 36.70A.131 and WAC 365-190-040(5) . For more information review the WA State Dept. of Natural Resources (DNR)'s Geology Division site	Na	NA	NA	Completed: <input type="checkbox"/> Date:

Siting Essential Public Facilities

Regulations for siting essential public facilities should be consistent with [RCW 36.70A.200](#) and consider [WAC 365-196-550](#). Essential public facilities include those facilities that are typically difficult to site, such as airports, state education facilities, state or regional transportation facilities, state and local correctional facilities, solid waste handling facilities, and in-patient facilities including substance abuse facilities, mental health facilities, group homes, and secure community transition facilities. Regulations may be specific to a local jurisdiction, but may be part of county-wide planning policies (CWPPs).

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p>Regulations for CWPPs include a process for siting EPFs and ensure EPFs are not precluded. RCW 36.70A.200 amended in 2023, WAC 365-196-550(6) lists process for siting EPFs. WAC 365-196-550(3) details preclusions. EPFs should be located outside of known hazardous areas.</p> <p>Visit Commerce's Behavioral Health Facilities Program page for information on establishing or expanding new capacity for behavioral health EPFs.</p> <p>Note: RCW 36.70A.200 amended by SB 5536 to include EPFs for opioid treatment programs</p>	Yes	No	EPF regulations allow anything listed in statute – no changes required	Completed: <input type="checkbox"/> Date:

Subdivision Code

a. Subdivision regulations are consistent with and implement comprehensive plan policies. RCW 36.70A.030(8) , RCW 36.70A.040(4)	NA	NA	NA	Completed: <input type="checkbox"/> Date:
<p>b. Written findings to approve subdivisions establish adequacy of public facilities. RCW 58.17.110 amended in 2018</p> <ul style="list-style-type: none"> Streets or roads, sidewalks, alleys, other public ways, transit stops, and other features that assure safe walking conditions for students. Potable water supplies, sanitary wastes, and drainage ways. RCW 36.70A.590 amended 2018 Open spaces, parks and recreation, and playgrounds Schools and school grounds <p>Other items related to the public health, safety and general welfare, WAC 365-196-820(1).</p>	Maybe	Maybe (minor)	Detailed review required	Completed: <input type="checkbox"/> Date:

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p>e. Preliminary subdivision approvals under RCW 58.17.140 and RCW 58.17.170 are valid for a period of five or seven years (previously five years).</p> <p>Note: preliminary plat approval is valid for: seven years if the date of preliminary plat approval is on or before December 31, 2014; five years if the preliminary plat approval is issued on or after January 1, 2015; and ten years if the project is located within city limits, not subject to the shoreline management act, and the preliminary plat is approved on or before December 31, 2007.</p>	NA	NA	NA	Completed: <input type="checkbox"/> Date:
<p>d. Include in short plat regulations procedures for unit lot subdivisions allowing division of a parent lot into separately owned unit lots. RCW 58.17.060 (3) new in 2023 by SB 5258 - section 11</p>	No	Yes (minor)	Need to review and revise	Completed: <input type="checkbox"/> Date:

Stormwater

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p>a. Regulations protect water quality and implement actions to mitigate or cleanse drainage, flooding, and storm water run-off that pollute waters of the state, including Puget Sound or waters entering Puget Sound. RCW 36.70A.070(1) Regulations may include: adoption of a stormwater manual consistent with Ecology’s latest manual for Eastern or Western Washington, adoption of a clearing and grading ordinance – See Commerce’s 2005 Technical Guidance Document for Clearing and Grading in Western Washington.</p> <p>Adoption of a low impact development ordinance. See Puget Sound Partnership’s 2012 Low Impact Development guidance and Ecology’s 2013 Eastern Washington Low Impact Development guidance.</p> <p>Additional Resources: Federal Grants to Protect Puget Sound Watersheds, Building Cities in the Rain, Ecology Stormwater Manuals, Puget Sound Partnership Action Agenda</p>	NA	NA	NA	Completed: <input type="checkbox"/> Date:
<p>b. Provisions for corrective action for failing septic systems that pollute waters of the state. RCW 36.70A.070(1). See also: DOH Wastewater Management, Ecology On-Site Sewage System Projects & Funding</p>	NA	NA	NA	Completed: <input type="checkbox"/> Date:

Organic Materials Management Facilities

New in 2022, [HB 1799](#) added a section to the GMA aimed at reducing the volumes of organic materials collected in conjunction with other solid waste and delivered to landfills, supporting productive uses of organic material waste and reduction of methane gas (a greenhouse gas).

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p><i>New section RCW 36.70A.142; new in 2022 legislation HB 1799; Development regulations newly developed, updated, or amended after January 1, 2025 allow for the siting of organic materials (OM) management facilities as identified in local solid waste management plans (SWMP) to meet OM reduction and diversion goals. Siting to meet criteria described in RCW 70A.205.040(3)</i></p> <p><i>See also RCW 36.70.330. For applicability, see RCW 70A.205.540</i></p>	No	Yes (minor)	No practical impact, but changes will be required to comply	Completed: <input type="checkbox"/> Date:

Impact Fees

May impose impact fees on development activity as part of the financing for public facilities, provided that the financing for system improvements to serve new development must provide for a balance between impact fees and other sources of public funds; cannot rely solely on impact fees.

<p>a. If adopted, impact fees are applied consistent with RCW 82.02.050 amended in 2015, RCW 82.02.060 amended in 2023 by SB 5258, .070, .080, .090 amended in 2018 and .100.</p> <p>WAC 365-196-850 provides guidance on how impact fees should be implemented and spent.</p>	Yes	Yes (major)	Impact fee changes required – included in proposed scope of update by CC and PC	Completed: <input type="checkbox"/> Date:
<p>b. Jurisdictions collecting impact fees must adopt and maintain a system for the deferred collection of impact fees for single-family detached and attached residential construction, consistent with RCW 82.02.050(3) amended in 2016</p>	Yes	No		Completed: <input type="checkbox"/> Date:
<p>c. If adopted, limitations on impact fees for early learning facilities RCW 82.02.060 amended in 2021</p>	Yes	Yes (major)	Impact fee changes required – included in proposed scope of update by CC and PC	Completed: <input type="checkbox"/> Date:
	In Current Regs? Yes/No	Changes needed to meet current statute?	Notes	

	If yes, cite section	Yes/No		
d. If adopted, exemption of impact fees for low-income and emergency housing development <u>RCW 82.02.060</u> amended in 2023. See also definition change in <u>RCW 82.02.090(1)(b)</u> amended in 2018	No	Yes (Major)	Impact fee changes required – included in proposed scope of update by CC and PC	Completed: <input type="checkbox"/> Date:
e. Ensure impact fees are not assessed on the construction of accessory dwelling units that are greater than 50 percent (50%) of the impact fees that would be imposed on the principal unit. <u>RCW 36.70A.681</u> new in 2023 by <u>HB 1337</u>	No	Yes (Major)	Impact fee changes required – included in proposed scope of update by CC and PC	Completed: <input type="checkbox"/> Date:
f. The schedule of impact fees reflects the proportionate impact of new housing units, including multifamily and condominium units, based on the square footage, number of bedrooms, or trips generated, in the housing unit in order to produce a proportionally lower impact fee for smaller housing units. <u>RCW 82.02.060</u> amended in 2023 by <u>SB 5258</u>	No	Yes (Major)	Impact fee changes required – included in proposed scope of update by CC and PC	Completed: <input type="checkbox"/> Date:

Concurrency and Transportation Demand Management (TDM)

Ensures consistency in land use approval and the development of adequate public facilities as plans are implemented, maximizes the efficiency of existing transportation systems, limits the impacts of traffic and reduces pollution.

a. The transportation concurrency requirement includes specific language that prohibits development when level of service standards for transportation facilities cannot be met. <u>RCW 36.70A.070(6)(b)</u> amended in 2023, <u>WAC 365-196-840</u> . Note: Concurrency is required for transportation, but may also be applied to park facilities, etc.	No	Yes (Major)	Impact fee changes required – included in proposed scope of update by CC and PC	Completed: <input type="checkbox"/> Date:
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	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p>b. Measures exist to bring into compliance locally owned, or locally or regionally operated, transportation facilities or services that are below the levels of service established in the comprehensive plan. RCW 36.70A.070(6)(a)(iii)(B) and (D), RCW 36.70A.070(6)(b) amended in 2023</p> <p>Levels of service can be established for automobiles, pedestrians and bicycles. See WAC 365-196-840(3) on establishing an appropriate level of service.</p>	No	Yes (Major)	Changes required	Completed: <input type="checkbox"/> Date:
<p>e. Highways of statewide significance (HSS) are exempt from the concurrency ordinance. RCW 36.70A.070(6)(a)(iii)(C)</p>				Completed: <input type="checkbox"/> Date:
<p>d. Traffic demand management (TDM) requirements are consistent with the comprehensive plan. RCW 36.70A.070(6)(a)(vi) Examples may include requiring new development to be oriented towards transit streets, pedestrian-oriented site and building design, and requiring bicycle and pedestrian connections to street and trail networks. WAC 365-196-840(4) recommends adopting methodologies that analyze the transportation system from a comprehensive, multimodal perspective.</p>				Completed: <input type="checkbox"/> Date:
<p>e. If required by RCW 82.70, a commute trip reduction (CTR) ordinance to achieve reductions in the proportion of single-occupant vehicle commute trips has been adopted. The ordinance should be consistent with comprehensive plan policies for CTR and Department of Transportation rules.</p>				Completed: <input type="checkbox"/> Date:

Tribal Participation in Planning new in 2022 (see [HB 1717](#))

A federally recognized Indian tribe may voluntarily choose to participate in the county or regional planning process. See Commerce's new [Tribal Planning Coordination for GMA](#) webpage for guidance and staff contacts.

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
a. Mutually agreeable memorandum of agreement between local governments and tribes in regard to collaboration and participation in the planning process unless otherwise agreed at the end of a mediation period. RCW 36.70A.040(3)(a) new in 2022.	NA	NA	NA	Completed: <input type="checkbox"/> Date:
b. Policies consistent with countywide planning policies that address the protection of tribal cultural resources in collaboration with federally recognized Indian tribes that are invited, provided that a tribe, or more than one tribe, chooses to participate in the process. RCW 36.70A.210(3)(i) new in 2022.	NA	NA	NA	Completed: <input type="checkbox"/> Date:

Regulations to Implement Optional Elements

a. New fully contained communities are consistent with comprehensive plan policies, RCW 36.70A.350 and WAC 365-196-345	NA	NA	NA	Completed: <input type="checkbox"/> Date:
b. If applicable, master planned resorts are consistent with comprehensive plan policies, RCW 36.70A.360 , RCW 36.70A.362 and WAC 365-196-460	NA	NA	NA	Completed: <input type="checkbox"/> Date:
c. If applicable, major industrial developments and master planned locations outside of UGAs are consistent with comprehensive plan policies, RCW 36.70A.365 , RCW 36.70A.367 and WAC 365-196-465	NA	NA	NA	Completed: <input type="checkbox"/> Date:
d. Regulations include procedures to identify, preserve, and/or monitor historical or archaeological resources. RCW 36.70A.020(13) , WAC 365-196-450	NA	NA	NA	Completed: <input type="checkbox"/> Date:

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
e. Other development regulations needed to implement comprehensive plan policies such as energy, sustainability or design are adopted. WAC 365-196-445	NA	NA	NA	Completed: <input type="checkbox"/> Date:
f. Design guidelines for new development are clear and easy to understand; administration procedures are clear and defensible	NA	NA	NA	Completed: <input type="checkbox"/> Date:
g. Local design review includes one or more ascertainable guideline, standard or criterion by which an applicant can determine whether a given building design is permissible under that development regulation. May not result in a reduction in density, height, bulk or scale below the generally applicable development regulations for a development proposal in the applicable zone. RCW 36.70A.630 new in 2023 by HB 1293	NA	No	Burlington does not have a design review process and uses only clear and objective standards	Completed: <input type="checkbox"/> Date:

Project Review Procedures

In 2023, [SB 5290](#) substantially amended local permit review processes. Codification and additional resources from Commerce are forthcoming.

<p>Project review processes integrate permit and environmental review. RCW 36.70A.470, RCW 36.70B and RCW 43.21C.</p> <p>Also: WAC 365-196-845, WAC 197-11(SEPA Rules), WAC 365-197 (Project Consistency Rule, Commerce, 2001) and Ecology SEPA Handbook.</p> <p>Integrated permit and environmental review procedures for:</p> <ul style="list-style-type: none"> • Notice of application • Notice of complete application • One open-record public hearing • Combining public hearings & decisions for multiple permits • Notice of decision • One closed-record appeal 	No	Yes (minor)	Revisions required to address permit processing procedure changes to RCW 36.70B	Completed: <input type="checkbox"/> Date:
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Plan & Regulation Amendments

If procedures governing comprehensive plan amendments are part of the code, then assure the following are true:

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
a. Regulations limit amendments to the comprehensive plan to once a year (with statutory exceptions). RCW 36.70A.130(2) and WAC 365-196-640(3)	NA			Completed: <input type="checkbox"/> Date:
b. Regulations define <i>emergency</i> for an emergency plan amendment. RCW 36.70A.130(2)(b) and WAC 365-196-640(4)	NA			Completed: <input type="checkbox"/> Date:
c. Regulations include a docketing process for requesting and considering plan amendments. RCW 36.70A.130(2) , RCW 36.70A.470 , and WAC 365-196-640(6)	NA			Completed: <input type="checkbox"/> Date:
d. A process has been established for early and continuous public notification and participation in the planning process. RCW 36.70A.020(11) , RCW 36.70A.035 and RCW 36.70A.140 . See WAC 365-196-600 regarding public participation and WAC 365-196-610(2) listing recommendations for meeting requirements.	NA			Completed: <input type="checkbox"/> Date:
e. A process exists to assure that proposed regulatory or administrative actions do not result in an unconstitutional taking of private property RCW 36.70A.370 . See the 2018 Advisory Memo on the Unconstitutional Taking of Private Property	NA			Completed: <input type="checkbox"/> Date:
f. Provisions ensure adequate enforcement of regulations, such as zoning and critical area ordinances (civil or criminal penalties). See implementation strategy in WAC 365-196-650(1) .	NA			Completed: <input type="checkbox"/> Date:

● **Appendix A: Housing unit minimums per population**

See Commerce’s [Middle Housing webpage](#) for more information and the [Middle Housing Fact Sheet](#) for the list of cities that must comply with the following requirements.

Cities with a population less than 25,000 but within the Contiguous UGA with the largest city in a county with a population greater than 275,000				
	In Current zoning? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
Zoning and development regulations allow at least two residential units per lot on all lots zoned predominantly for residential use, unless the lot is smaller than 1,000 square feet. RCW 36.70A.635 (1) and (6) HB 1110	NA	NA	NA	Completed: <input type="checkbox"/> Date:

Cities with a population between 25,000 and 75,000				
	In Current zoning? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
a. Zoning and development regulations allow at least: <ul style="list-style-type: none"> two residential units on each lot, four residential units on each lot if at least one unit is affordable, unless the lot is smaller than 1,000 square feet. 	NA	NA	NA	Completed: <input type="checkbox"/> Date:
b. Zoning and development regulations allow at least four residential units on each lot, within ¼ mile walking distance of a major transit stop.	NA	NA	NA	Completed: <input type="checkbox"/> Date:

Cities with a population greater than 75,000

	In Current zoning? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p>a. Zoning and development regulations allow at least:</p> <ul style="list-style-type: none"> • four residential units on each lot, • six residential units on each lot if at least two units are affordable, unless the lot is smaller than 1,000 square feet. 	NA	NA	na	Completed: <input type="checkbox"/> Date:
<p>b. Zoning and development regulations allow at least six residential units on each lot, within ¼ mile walking distance of a major transit stop.</p>	NA			Completed: <input type="checkbox"/> Date:

● Appendix B: Element updates per HB 1181

GMA Periodic Update Due Dates	Required Updates to GMA Elements per HB 1181						
	Greenhouse Gas Reduction Sub-element	Climate Resilience Sub-element	Transportation Element	Land Use Element	Capital Facilities Element*	Utilities Element*	Parks & Recreation Element*
For jurisdictions with a 2024 deadline and subject to GHG Emissions Reduction [Sec. 15 (10)]	Due 2029	Due 2029	Due 2029	Due in 2034			
For jurisdictions with a 2025 & 2026 deadline and subject to GHG Emissions Reduction [Sec. 4 (1) and (2)]	X	X	X	X	X*	X*	X*
Jurisdictions <u>not</u> subject to GHG Emissions Reduction (all years) [Sec. 4 (3) and 9(e)(i)]	Optional	X See RCW 36.70A.070(9)(e)	**	Only counties over 20k pop.	X*	X*	X*

Table notes: "X" indicates a GMA update requirement. One asterisk (*) indicates jurisdictions should make a good faith effort to update their elements to be consistent; refer to HB 1181 (Chapter 228, Laws of 2023) for specifics. Two asterisks (**) indicates 22 cities that need to update their transportation element based on population, not whether or not their county is among those that must develop a GHG emissions element.