



Planning Commission Recommendation

To: Burlington City Council

From: Burlington Planning Commission

Project: 2025 Capital Improvement Plan (CIP) Update

Date: June 18, 2024

Summary:

The Planning Commission has reviewed a revised Capital Improvement Plan (CIP) prepared by the Community Development Department. The Planning Commission finds that the updated CIP is consistent with the City's Comprehensive Plan and applicable Growth Management Act requirements. Subject to a number of minor revisions the Planning Commission recommends the City Council adopt the updated CIP.

Findings:

1. The City of Burlington is required to adopt, and periodically update, a comprehensive plan (RCW 36.70A.040).
2. Washington State law requires that the City's comprehensive plan include a capital facilities element identifying the facilities, property, and equipment necessary to meet the needs of the population and employment growth forecasted by the comprehensive plan (RCW 36.70A.070(3) and WAC 365-196-415)).
3. The capital facilities element of the comprehensive plan must include a detailed financing plan identifying specific costs and sources of revenue for a six-year period. This financing plan is known as a Capital Improvement Plan (CIP).
4. In order to ensure the CIP covers a six-year period, and to ensure consistency with current financial conditions, the CIP must be updated annually.

5. The Washington State Growth Management Act requires that comprehensive plans be internally consistent documents and that all local government actions be consistent with the adopted comprehensive plan (RCW 36.70A.120).
6. The Planning Commission has reviewed the updated CIP prepared by the Community Development Department and finds that it is generally consistent with the City's adopted Comprehensive Plan and all applicable Growth Management Act requirements.
7. With respect to the following projects, the Planning Commission finds they lack important information such as project management briefs and phasing information. However, they are otherwise consistent with the Comprehensive Plan and may be added to the CIP if the required information is submitted prior to action by the City Council:
 - a. 8-2024-2 – Police Department interior remodel
 - b. 2-2024-13 – Paint and stain the Visitor Information Center (VIC)
 - c. 11-2024-1 – Covered equipment storage – Section Street Facility
 - d. 11-2025-1 – Grade separated rail crossing
 - e. 11-2025-3 – SR-20 non-motorized and safety improvements
 - f. 11-2025-4 – Gardner Road improvements
 - g. 11-2025-6 – Fairhaven streetscape improvements
 - h. 11-2025-7 – Whitmarsh Road reconstruction
 - i. 11-2025-8 – Pease Road improvements
 - j. 11-2025-9 – Fairhaven entrance roundabout
8. With respect to CIP Project Number 7-2024-5 (Parks Department Revised PROS Plan), the existing PROS Plan was adopted by reference and incorporated as part of the Burlington Comprehensive Plan. Burlington Comprehensive Plan Policy (BCPP) 9.3.2.2 requires that changes to functional or implementation plans, such as the PROS Plan, must be consistent with all other portions of the Comprehensive Plan. Washington State law also requires that Comprehensive Plans be "internally consistent" (RCW 36.70A.070). The Planning Commission finds that consistent with the policies of the Burlington Comprehensive Plan, and the requirements of the GMA, changes to the adopted PROS Plan will require corresponding changes to the Burlington Comprehensive Plan.
9. With respect to projects listed below, the Planning Commission finds that inadequate information is available to meaningfully evaluate these projects for consistency with applicable comprehensive plan policies and GMA requirements. Crucially, BCPPs 6.4.1.3, 6.4.2.4, and 6.4.2.3 charge the Planning Commission with providing guidance on prioritizing capital projects and evaluating the need and cost effectiveness of proposed improvements. In order to meaningfully evaluate proposed capital projects, it is important that complete information be provided for each proposal, including, but not limited to information on the capacity and condition of existing buildings and facilities, an evaluation of alternatives, and information on the specific public service needs each project is

intended to address. Additional policies and requirements apply to major transportation and park projects. Accordingly, the Planning Commission finds the following projects should not be included in the 2025 CIP, and encourages staff to resubmit these projects with complete information before the next CIP update cycle:

- a. 2-2025-1 – Police Department wellness center
- b. 11-2024-3 – Operation headquarters building

10. The Community Development Department reviewed capital planning information submitted by Dike District 12, Skagit Valley Community College, Skagit PUD, and Skagit Area Transit (SKAT). The Community Development Department determined that the capital planning information submitted by these agencies was sufficient to demonstrate consistency with the Burlington Comprehensive Plan.
11. Skagit County submitted a capital plan covering a six-year period in 2024. The plan submitted by Skagit County in 2024 was previously found to be consistent with the Burlington Comprehensive Plan. Skagit County indicated their capital planning cycle for 2025 will begin in late 2024. Because Skagit County does not provide growth related services in the City of Burlington and has an existing conforming capital plan, the Planning Commission finds that Skagit County's 2024 CIP is sufficient for purposes of coordinating capital planning requirements. If Skagit County submits an updated CIP prior to the Burlington City Council's final budget action it can be included into Burlington CIP at that time.
12. With respect to the capital plan submitted by the Burlington Edison School District (BESD), the Planning Commission makes the following findings:
 - a. Burlington Comprehensive Plan Policy (BCPP) 6.4.1.1 states that all agencies operating in the City of Burlington shall maintain detailed capital plans and that capital plans must (a) cover a period of at least six years, (b) be updated annually, (c) be based on the population and employment projections adopted by the City, and (d) be consistent with the Burlington Comprehensive Plan.
 - b. BCPP 6.5.1.1 states that elements of a capital plan related to population or employment growth, such as student enrollment, shall be based on, and clearly cite, the City's adopted population and employment projections.
 - c. The Burlington Edison School District (BESD) last adopted a capital plan in 2021 covering a period through the year 2026. The Planning Commission finds that BESD's capital plan has not been updated annually and, as of the year 2024, does not cover a six-year period as required by BCPP 6.4.1.1.

- d. The BESD capital plan explicitly states that the City's projected population and employment growth will not create a need for additional classroom space or school facilities. The Burlington Comprehensive Plan states that the City's population will increase by 3,808 people between 2016 and 2036. While the BESD's capital plan correctly cites the City's adopted population projection, no demographic analysis has been provided to substantiate BESD's claim that no additional facilities will be needed to support this growth. The Planning Commission finds that absent a sufficient factual and static basis, BESD's statements regarding student enrollment growth are not credible, and consequently, BESD's capital plan is not consistent with BCPP 6.5.1.1.
- e. The Planning Commission has reviewed communications between the City's Community Development Department and the BESD. These communications show that Community Development staff provided BESD with official population and housing projections adopted by the Skagit Council of Governments showing that, through the year 2045, Burlington's population would increase by 4,819 people and that at a minimum, an additional 2,843 housing units would be constructed by the year 2045. The City's Community Development also provided BESD with information showing that since the year 2021, 1,415 housing units were permitted, under construction, or completed in the City of Burlington. Contrary to BESD's adopted capital plan, which claims no growth will occur, BESD staff conceded the City's projected and ongoing population and housing growth might increase enrollment. However, BESD has provided no enrollment projections and has made no attempt to quantify the impact this growth might have on its facilities. The Planning Commission finds that BESD's capital plan does not consider ongoing or projected growth and fails to consider the impact this growth may have on BESD's facilities contrary to requirements of BCPPs 6.5.1.1 and 6.5.1.3.
- f. A budget "FAQ" page posted on BESD's website states that:

"We do not anticipate much growth in enrollment over the next few years, primarily due to a lack of available housing across our region. We will see a few new apartment complexes in our area over the next few years, but they are mostly one- and two-bedroom units. We do not anticipate this will add very many students into our schools".

The FAQ page and BESD's capital plans do not explain how BESD arrived at their conclusions regarding future enrollment. Contrary to BESD's assertions regarding "a lack of available housing" and a "few" apartments being constructed, the information provided to BESD by Community Development staff shows that since the year 2021, 1,415 housing units were permitted, under construction, or completed in the City of Burlington, and that an additional 2,843 housing units

would be constructed through the year 2045. The Burlington Comprehensive Plan indicates that in the year 2016, the City of Burlington had a total of 3,666 housing units. It is neither reasonable nor accurate to characterize this growth as a lack of available housing or as a few apartments. The current development pipeline of 1,415 units represents a 39 percent increase in Burlington's housing stock and the projected growth of 2,843 units will be equivalent to a 78 percent increase in the City's housing stock, when compared to data from the year 2016. The Planning Commission finds that BESD has not meaningfully engaged in a capital planning process that addresses the City's ongoing or projected growth and cautions that failing to do so may result in significant capacity challenges in the future.

- g. The Planning Commission finds that BESD does not have a conforming capital plan and is not conducting planning activities consistent with the Burlington Comprehensive Plan and Washington State law.

13. With respect to the Housing Authority of Skagit County (HASC), the Planning Commission makes the following findings:

- a. The Planning Commission finds that HASC is the primary government agency charged with providing affordable and subsidized housing in the City of Burlington.
- b. The Planning Commission has reviewed communications between the City's Community Development Department and HASC. These communications show that Community Development staff provided HASC with official housing needs projections adopted by the Skagit Council of Governments (SCOG). The SCOG projections provided to HASC were developed using an approved forecasting model developed by the Washington State Department of Commerce (HAPT tool). The SCOG projections provided to HASC show that through the year 2045, a minimum of 2,843 housing units will be needed in the City of Burlington. Relevant to HASC's role, 893 of the projected housing units will need to be affordable to households earning a median income of 30 percent or less of the Area Median Income (AMI). A further 572 will need to be affordable for households with an income between 31 and 50 percent of the AMI.
- c. Providing the 1,465 housing units needed for households with incomes of 50 percent or less than the AMI will likely require some form of public support or subsidy. Support may also be required for households with higher incomes. The Planning Commission finds that as the primary public agency charged with developing affordable housing and providing housing assistance in the City of Burlington, HASC has an obligation to plan for future growth and develop capital plans accordingly. The communications between HASC and the City's Community

Development Department indicate that HASC has not considered projected growth or future housing needs in their capital plans. HASC has indicated they plan on building little or no housing over the planning period.

- d. Burlington Comprehensive Plan Policy (BCPP) 6.4.1.1 states that all agencies operating in the City of Burlington shall maintain detailed capital plans and that capital plans must (a) cover a period of at least six years, (b) be updated annually, (c) be based on the population and employment projections adopted by the City, and (d) be consistent with the Burlington Comprehensive Plan.
- e. BCPP 6.5.1.1 states that elements of a capital plan related to population or employment growth, such as housing needs, shall be based on, and clearly cite, the City's adopted population and employment projections.
- f. BCPP 6.5.1.3 states that the impacts of projected population and employment growth shall be quantified and any capital improvements necessary to support population and employment growth shall be clearly identified.
- g. The need for affordable housing, and publicly supported housing, in the City of Burlington and Skagit County has been well documented. Skagit County, and the cities in Skagit County, currently have a gap between the number of publicly supported housing units needed and the number of units available. Without an increase in the number of publicly supported housing units, this gap can only be expected to increase with population and employment growth. The housing projects adopted by SCOG illustrate the magnitude of this gap in future years.
- h. On April 4, 2024, the Burlington Community Development Department contacted HASC and requested a capital plan, or any information regarding HASC's future capital needs or projections. On May 15, 2024, HASC responded by indicating they had made no changes to the capital plan they previously provided to the City in November 2023. The 2023 capital plan includes a number of maintenance projects and a single new capital project. The capital plan includes no consideration of future growth and does not attempt to address the official housing needs projections adopted by SCOG.
- i. The only expansion project identified by the HASC is labeled "new project". No further information is provided for this project regarding the number of units it would contain, when it would be constructed, or where it would be located.
- j. Because the capital planning information submitted by HASC does not include information on population growth, housing demand, or the need for publicly supported housing, it is not consistent with BCPPs 6.5.1.1 or 6.5.1.3.

- k. BCPP 6.5.1.4 states that if new land will be needed to accommodate capital projects an analysis shall be provided identifying the approximate location and characteristics of the necessary land. The “new project” identified in HASC’s capital planning information will require land, but no information is provided with respect to amount or characteristics of the required land.
 - l. The Planning Commission finds that a pressing need exists for affordable housing and that this need can be expected to grow in future years. The Planning Commission further finds that as the primary agency responsible for providing publicly supported affordable housing, the Housing Authority of Skagit County has a responsibility to engage effectively with other local governments and to develop plans for the provision of affordable housing.
 - m. The Planning Commission finds that the Housing Authority does not have a conforming capital plan and is not conducting planning activities consistent with the Burlington Comprehensive Plan and Washington State law.
14. The proposed CIP was considered by the Planning Commission at a public meeting on April 17, 2024, and at a public hearing on June 18, 2024.

Recommendation:

Based on the findings presented above the Planning Commission respectfully makes the following recommendations to the City Council:

1. The City Council should adopt the 2024 Capital Improvement Plan (CIP) attached to this recommendation as exhibit “A” subject to the additional recommendations below.
2. The following projects lack phasing or project management information but are otherwise consistent with the Burlington Comprehensive Plan and the requirements of the Washington State Growth Management Act. The Planning Commission recommends they be included in the 2025 CIP if complete phasing and project management information is submitted prior to final approval by the City Council:
 - a. 8-2024-2 – Police Department interior remodel
 - b. 2-2024-13 – Paint and stain the Visitor Information Center (VIC)
 - c. 11-2024-1 – Covered equipment storage – Section Street Facility
 - d. 11-2025-1 – Grade separated rail crossing
 - e. 11-2025-3 – SR-20 non-motorized and safety improvements

- f. 11-2025-4 – Gardner Road improvements
 - g. 11-2025-6 – Fairhaven streetscape improvements
 - h. 11-2025-7 – Whitmarsh Road reconstruction
 - i. 11-2025-8 – Pease Road improvements
 - j. 11-2025-9 – Fairhaven entrance roundabout
- 3. The following projects lack complete information regarding existing capacity, future demand, an evaluation of alternatives, and prioritization, and the Planning Commission recommends they be excluded from the 2025 CIP:
 - a. 2-2025-1 - Police Department Wellness Center
 - b. 11-2024-3 – Operations headquarters building
- 4. The Planning Commission recommends that the City Council formally determine the following agencies lack conforming capital plans:
 - a. The Burlington Edison School District (BESD)
 - b. The Housing Authority of Skagit County (HASC)
- 5. With Respect to BESD, the Planning Commission strongly recommends that the City continue efforts to work with BESD on the development of long-term enrollment projections based on statistically valid methods and officially adopted population and housing projections.
- 6. With respect to HASC, the Planning Commission strongly recommends that the City of Burlington, and its regional partners, continue to push HASC to expand the availability of affordable housing options and increase support for low-income households by maximizing the utilization of vouchers and existing funding sources. Also, consistent with proposed changes to the Countywide Planning Policies (CPPs) and recommendations being developed by the North Star group, HASC should fully engage with other local governments on the planning, development, and provision of new housing for low-income households consistent with official housing needs projections adopted by SCOG.
- 7. The Planning Commission recommends that the City Council formally determine that the capital planning materials submitted by the following agencies constitute

“conforming capital plans” and fully comply with applicable Burlington Comprehensive Plan policies. The Planning Commission recommends that the capital planning information submitted by these agencies be adopted by reference and considered a part of the 2025 Burlington CIP.

- a. Diking District 12
 - b. Skagit PUD
 - c. Skagit Area Transit
 - d. Skagit County
8. The Planning Commission recognizes that the CIP is intended to guide the development of the City’s annual budget and that changes may be necessary as the budget development process move forward. Accordingly, the Planning Commission recommends that a final CIP, incorporating any changes made during the budget development cycle be adopted concurrently with the annual budget following a review by the Planning Commission. The final CIP adopted concurrently with the City’s annual budget should also include any updated information submitted by other public agencies.

Dated this _____ day of June 2024

Marianne Manville-Ailles
Chair, City of Burlington Planning Commission

Attachments:

“A” 2025 Capital Improvement Plan