



Planning & Development Services

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To: Stacie Pratschner, Mount Vernon Development Services Director
Brad Johnson, Burlington Community Development Director
John Coleman, Anacortes Director of Planning, Community and Economic Development
Thomas E. Glover, Sedro-Woolley Community Development Director

Cc: Kevin Murphy, Skagit Council of Governments Executive Director

From: Jack Moore, Skagit County Planning and Development Services Director

Date: July 15, 2024

RE: Update and coordination on 2025 Skagit County Comprehensive Plan

We appreciate the continued coordination and communication as Skagit County and each of the cities complete the required Periodic Comprehensive Plan updates. The update process is complex and new State requirements, especially around housing, will require thoughtful collaboration to ensure best outcomes for those we serve.

To ensure Skagit County is communicating well with SCOG and each of the cities, this memorandum provides an update on our Periodic Comprehensive Plan update approach. We are providing this as early in the process as possible to ensure we can continue to work together.

0-50% AMI County share in rural areas and allocation to Swinomish UGA

The Draft Countywide Planning Policies allocate 146 housing units to rural Skagit County that lie within the 0-50% AMI housing category. Based upon recent guidance from the Department of Commerce, housing units below 50% AMI should not be allocated to rural areas, because those units would consist of multi-family housing which is not allowed in rural areas.

Skagit County is not requesting a reduction in population growth. However, for the housing targets, those allocated at 50% AMI and under will need to be reallocated.

In addition, the draft CPPs allocate 118 housing units, 199 in total population, and 439 jobs to the Swinomish UGA. Unfortunately, the lands within the UGA are in Tribal Trust. The County does not have regulatory control over those areas. Therefore population, housing, and employment cannot be allocated to the Swinomish UGA.

Skagit County can absorb the projected population and employment targets within rural areas along with the portion of the housing target at 51% AMI and higher. This leave 61 housing units at below 50% AMI which need to be reallocated.

Population, Housing, and Employment to unincorporated UGAs

Based upon recent conversations at SCOG with the cities, our goal is to communicate how Skagit County plans to approach planning for growth within the UGAs.

Given the policy approach within the CPPs and draft growth allocations, Skagit County, as part of its planning approach, is assuming that growth allocated to each of the cities (population, housing, and employment) will be accommodated within its city limits. While the Community Attributes report provided early growth targets which distinguished preliminary growth allocated to cities and the unincorporated UGAs, the current CPPs do not show separate targets for the cities vs. unincorporated UGAs.

RCW 36.70A.115 states “(1) Counties and cities that are required or choose to plan under RCW 36.70A.040 shall ensure that, taken collectively, adoption of and amendments to their comprehensive plans and/or development regulations provide sufficient capacity of land suitable for development within their jurisdictions to accommodate their allocated housing and employment growth...”

This means that if Skagit County is going to be allocated urban growth, it would be required to have commensurate land use and zoning to demonstrate it can accommodate the allocated housing and employment targets.

Based upon feedback received from the cities thus far and policy direction in the CPPs, Skagit County is moving forward presuming each city will accommodate its allocated growth within its city limits.

If any city has concerns over this approach, please contact us immediately. Given our draft comprehensive plan is currently being prepared and our studies are based on these assumptions, any variations would need to be made now.

City initiated comprehensive plan amendment

Several of the cities have noted the possibility of requesting a UGA expansion, swap, or contraction. Please note that the deadline for a city to file an application to be considered as part of the Periodic Comprehensive Plan update is Wednesday, July 31, 2024. More information about the filing requirements may be found in [SCC 14.08.030\(2\)](#). The application can be found on the Skagit County PDS [application webpage](#). The July 31 deadline does not apply to Skagit County initiated requests. However, given the County update is moving forward this summer, any discussions about UGA changes a city would like the county to take up would need to occur immediately. This is because the changes need to be assessed as part of updating the comprehensive plan and as part of SEPA. Please contact us if you have any questions.

Countywide Planning Policy (CPP) update

On June 4th, the Growth Management Act Technical Advisory Committee (GMATAC) recommended adoption of revisions to the Countywide Planning Policies (CPPs). This includes policy revisions and new population, housing targets and employment projections.

Based on the conversation at the June 4th meeting and the 2002 Framework Agreement which outlines the process for adopting CPP amendments, it may be several months until the CPPs are adopted. However, the Skagit County Comprehensive Plan is required to have policies consistent with the CPPs. Given we are beginning the process to update policies this summer, we cannot wait until the CPPs are adopted to begin updating policies or plan for our allocated growth and employment.

To move our update forward, we will utilize the current CPP draft to prepare draft policy changes which will be viewed by the public and Planning Commission this summer and fall. We will then make policy changes for the full comprehensive plan draft in early 2025 if additional CPP amendments are made prior to final adoption. In addition, we will also utilize the growth and employment targets in the draft CPPs with the modifications noted in the sections above. If the SCOG and cities wish to modify the draft targets based on the information above prior to final adoption of the CPPs, we stand willing to work with you on that process. This could avoid a more complicated reconciliation process after each jurisdiction has adopted its updated Plan in 2025.

Summary

We appreciate the opportunity to continue to work closely with each of the communities in Skagit County. As stated above, the goal of this letter is to make sure we work together and communicate early on tough planning challenges.

Please reach out if you have any comments, questions, or concerns. We are happy to meet with you anytime.