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## Planning Commission Recommendation

**To:** Burlington City Council

**From:** Burlington Planning Commission

**Project:** 2025 Comprehensive Plan Update – Development Capacity Analysis

**Date:** November 20, 2024

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### Summary:

The Growth Management Act (GMA) requires cities and counties to adopt comprehensive plans. The GMA further requires that plans adopted by the cities and counties be periodically reviewed, and if necessary, updated. The purpose of this periodic update requirement is to ensure that plans reflect current legal requirements, up-to-date technical knowledge, and changing local circumstances. A key component of the periodic update process is ensuring that urban growth areas (UGAs) have sufficient capacity for development based current population projections.

Urban growth areas are intended to concentrate growth and development within cities and limit sprawling development in rural areas. UGAs are also intended to reduce the cost of providing public services such as sewer, fire protection, and transportation. Under the GMA, counties, not cities, are responsible for determining the size and boundaries of a city's UGA. UGAs must have enough land to accommodate twenty years of population and employment growth. UGAs must also have enough land to accommodate the public facilities necessary to serve the projected growth and include sufficient allowances for needed housing types.

Skagit County, through a Growth Management Steering Committee, completed countywide population and employment forecasts on June 20, 2024. Through this process the Steering Committee also allocated a portion of countywide population and employment growth to each city in the County. The Steering Committee determined that between 2022 and 2045 the City of Burlington will grow by 4,819 people and 5,770 jobs. Burlington must also accommodate a minimum of 2,843 additional housing units.

The Washington State Growth Management Act (GMA) and the Skagit County Countywide Planning Policies (CPPs) have both been recently amended to prevent urban sprawl, reduce

travel demand, and locate housing in areas close to jobs, services, and other public amenities. This means that all of Burlington’s projected growth and development must be accommodated within the City’s existing UGA. It also means that each of the cities in Skagit County must take steps to ensure their existing UGAs can accommodate their share of the region’s growth.

In order to address the requirements outlined above, and to assess the City’s ability to accommodate allocated growth, the Community Development Department prepared a Development Capacity Analysis (DCA) analyzing the City’s ability to accommodate development under existing and planned conditions. The DCA also includes a summary of potential changes to accommodate additional growth. The Planning Commission has reviewed the DCA and recommends it be used to inform future work on 2025 Comprehensive Plan Update.

### **Findings:**

The Planning Commission reviewed the requirements of the Growth Management Act (GMA) and a Development Capacity Analysis (DCA) prepared by the Community Development department. Based on this review the Planning Commission makes the following findings:

1. In order to address the requirements of the GMA Burlington adopted a comprehensive plan and implementing regulations in 1994.
2. The GMA requires cities and counties to periodically update their comprehensive plans and development regulations. Specifically, cities must update their comprehensive plans and development regulations on regular cycle (RCW 36.70A.130(5)). Burlington’s last required update was due June 2016. The next scheduled periodic update is due June 2025.
3. The GMA requires that urban growth areas (UGAs) be designated around cities. UGAs are intended to define the limits of urban growth, encourage growth and development within cities, and discourage sprawling urban development in rural area (RCW 36.70A.020 and 36.70A.110).
4. Counties, not cities, are responsible for establishing the boundaries of urban growth areas, and counties and cities are required to work together to ensure that UGAs have sufficient capacity to accommodate 20 years of population and employment growth. UGAs must also include sufficient areas, use allowances, and permitted development densities to accommodate future housing, public facility, and park and open space needs (RCW 36.70.110(1) and 36.70A.115).
5. Counties, and the cities within them, are required collaboratively to develop, and administer, countywide planning policies (CPPs). Countywide planning policies are intended to ensure consistency between the plans adopted by the counties and the plans adopted by the cities within them, and to ensure adequate coordination on important regional issues such as growth allocations, housing policy, and transportation.

6. Among other considerations, countywide planning policies must address growth forecasting methods and the process for establishing and modifying urban growth areas. Counties, cities, and state agencies must adhere to adopted countywide planning policies (RCW 36.70A.210).
7. The population and employment forecasts used by counties and cities must be based on, and within the range established by, the population forecasts issued for each County by the Washington State Office of Financial Management (OFM) (RCW 36.70A.110(2)).
8. Forecasts of needed housing types must be based on the forecasts issued for each county by the Washington State Department of Commerce (Commerce) (RCW 36.70A.070(2)).
9. Because the population and housing forecasts identified above are issued at the county-level, and because population and housing must primarily be accommodated within city UGAs, it is necessary, for planning purposes, to allocate projected growth to each city and UGA in the County.
10. In Skagit County, countywide planning activities are coordinated by a “Growth Management Act Steering Committee” (GMASC) comprised of elected officials from Skagit County and the cities within Skagit County. On June 20, 2024, the GMASC voted to revise the Skagit County Countywide Planning Policies (CPPs).
11. The revised CPPs adopted by the GMASC included changes altering the regional growth allocations to reflect current OFM and Commerce forecasts, and to allocate the forecasted growth and housing needs to each city and UGA in the County. The revised CPPs also included changes necessary to implement newly adopted changes to Washington State law. The newly adopted changes address Growth Management Act (GMA) planning requirements related to housing, transportation, and climate change. The Planning Commission has reviewed the proposed CPP amendments.
12. After the initial growth allocations were adopted, the Skagit County Planning Department assessed the development capacity of the County’s rural areas, Limited Areas of More Intensive Rural Development (LAMIRDs), and the Bayview Ridge Urban Growth Area. Based on this review, Skagit County determined it was not feasible, within the confines of Washington State law or applicable CPPs, to accommodate the number of higher-density housing types initially allocated to the County under the CPP amendments adopted by the GMASC. The County’s conclusion is based on GMA requirements that prohibit higher-density development in rural areas and that promote the location of housing in centrally located urban areas with good access to employment, services, and transportation.
13. In response to the concerns raised by Skagit County, the Growth Management Act Technical Advisory Committee (GMATAC) reconciled the initial housing allocations with

Skagit County’s capacity constraints. Ultimately the GMATAC recommended that a percentage of the higher-density housing types that were initially allocated to rural Skagit County, be reallocated to each of the cities in the County, and that an equivalent number of lower-density housing types (detached homes) that were initially allocated to the cities, be reallocated to rural Skagit County (Exhibit “C”). Under this framework, the reallocation process distributed the higher-density housing types to each city proportionate to each city’s share of the overall county population. The reallocation process changed only the composition of housing types allocated to each jurisdiction, but did not change the population, employment, or overall number of housing units allocated to each city.

14. Under the reconciled growth allocation adopted by GMASC, the City of Burlington must demonstrate that sufficient development capacity exists for a population increase of 4,819 people, the construction of 2,843 housing units, and an employment increase of 5,770 additional jobs.
15. A comprehensive Development Capacity Analysis (DCA) was conducted as part of the 2016 Comprehensive Plan Update. For the 2025 Comprehensive Plan Update, the City’s Community Development Department compared the results of the 2016 DCA against permit and development records and used the current growth allocations adopted by the GMASC to assess whether additional capacity would be required or not. This analysis demonstrated capacity deficiencies for housing and employment. Specifically, the Community Development Department identified the following deficiencies: (a) an employment capacity shortfall of 2,171 jobs and (b) a housing capacity shortfall of 131 units.
16. The DCA update prepared by the Community Development Department is documented in a report dated November 15, 2024.
17. The 2024 DCA update also includes a range of potential actions to increase development capacity.
18. Based on the 2024 DCA, the Planning Commission finds that the City can, with appropriate changes to the planning policies and development regulations, accommodate the regional growth allocations adopted by the GMASC.

**Recommendation:**

The City of Burlington Planning Commission hereby adopts the findings, conclusions, and recommendations identified in the Community Development Department’s report on development capacity dated November 15, 2024 (see attachment “A”). The Planning Commission recommends this report serve as a basis for all future work on the comprehensive plan update and direct the Planning Department to develop more specific changes to the comprehensive plan and development regulations based on the recommendations identified in the land capacity report. The Planning Commission notes that refinements to this study should be made as better information becomes available through the Comprehensive Plan update process.

**DATED this \_\_\_\_\_ day of November 2024**

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Marianne Manville-Ailles  
Chair, City of Burlington Planning Commission

Exhibits:  
“A” 2024 Development Capacity Report