



**San Juan County Department of Community Development
San Juan County 2025 Growth Management Act (GMA) Periodic Update**

REQUEST FOR PROPOSALS

TO COMPLETE A COMPREHENSIVE PLAN UPDATE AS PART OF SAN JUAN COUNTY'S 2025 GMA PERIODIC UPDATE. THE COMPREHENSIVE PLAN UPDATE WILL INCLUDE A LAND CAPACITY ANALYSIS, HOUSING NEEDS ASSESSMENT, UPDATES TO PLAN ELEMENTS AND APPENDICES, AND A TABLE OF DEVELOPMENT CODE AMENDMENTS TO COMPLY WITH THE GMA PERIODIC UPDATE REQUIREMENTS

Agency Description

San Juan County (County) is in the San Juan Islands archipelago in northwest Washington State. Situated at the heart of the Salish Sea, the County is a biologically diverse marine area of spectacular beauty and rich cultural history. The San Juan Islands encompass over 400 islands and rocks at mean high tide, four of which are accessible by Washington State Ferries, including San Juan Island, Orcas Island, Lopez Island and Shaw Island. San Juan County (est. pop. 18,000) has a total area of 621 square miles, of which 174 square miles is land, making it the smallest county in Washington by land area. San Juan County contains the largest amount of marine shoreline in the state, with 410 miles.

San Juan County is primarily rural, with three Urban Growth Areas, each with under 3,000 people. The Town of Friday Harbor is the County's only incorporated UGA. The County experiences a seasonal population increase due to the influx of seasonal residents and visitors in the warmer months. Tourism and seasonal population change play significant roles in the County's economy and pose infrastructure, environmental, and housing challenges. The County's Vision prioritizes a "healthy natural environment, vibrant and diverse community, self-sufficiency, interdependence, privacy, personal freedom, independence, and stewardship of our common resources." Through the Comprehensive Plan, the County strives to meet the needs of the projected population and realize the collectively developed Vision.

The Comprehensive Plan update is led by San Juan County's Department of Community Development (DCD), with support from other departments and local organizations. DCD is responsible for building permits and inspections, code enforcement, land use designations, long range planning, and more. For more information about San Juan County's Department of Community Development, visit <https://www.sanjuancountywa.gov/1778/Community-Development>

Project Description

San Juan County is accepting proposals to update its Comprehensive Plan as part of the GMA periodic update per RCW 36.70A.130(6)(b). The County is required to complete a periodic update by June 30, 2025; however, the County is eligible for a 2-year extension. San Juan County

adopted its last, overdue, periodic update in November 2022 by Ordinance 20-2022. The last Comprehensive Plan Update included significant revision of the entire plan, and incorporated hundreds of hours of work from the Planning Commission and County Council. It also incorporated public feedback from engagement events, surveys, written and oral comments, and testimony at public hearings. The primary purpose of the 2025 Comprehensive Plan update is to remain compliant with the GMA.

The consultant and their subconsultants will identify amendments required by the GMA, complete necessary analyses and assessments, conduct public engagement, draft Comprehensive Plan amendments, and create a list of development code amendments based on the draft Plan amendments. This contract does not include drafting San Juan County's new Climate Element.

The Comprehensive Plan update is funded by a Periodic Update Grant from the Washington State Department of Commerce.

The Department of Community Development website is available at:
<https://www.sanjuancountywa.gov/1778/Community-Development>

All submittals must be received by 3:00 pm on Wednesday, February 7, 2024.

Purpose

The purpose of the Comprehensive Plan Update is to ensure compliance with the GMA and plan to accommodate the future needs of the projected population of 23,014 in 2045. The Consultant will:

- Identify areas of the Plan which need to be updated for compliance with new changes to the GMA;
- Conduct required analyses and update appendices with latest information;
- Draft Plan amendments;
- Create and implement a public participation plan, summarize results, and incorporate feedback into the draft Plan; and
- Identify and track development code amendments needed because of Plan amendments.

Project Goals and Objectives

Goal: Ensure compliance with the Growth Management Act.

- Update the Comprehensive Plan to meet the requirements listed in the Periodic Update checklist provided by the Department of Commerce (draft attached)
- Provide opportunities for early and continuous public participation and incorporate public feedback into draft elements

Goal: Meet the needs of the projected population consistent with the adopted Comprehensive Plan Vision.

- Engage the residents of San Juan County to ensure public concerns and aspirations are incorporated into new policies;

- Build off the goals and policies in the existing Comprehensive Plan, updated in 2022; and
- Update Elements and Appendices to reflect current conditions and data and to ensure consistency between elements.

General Scope of Work

Consultant work will begin March 2024. The final contract scope of work will clearly state the file type in which the Contractor will provide deliverables. All work must be complete by June 30, 2025.

Periodic Update Checklist

The consultant will review San Juan County's [Comprehensive Plan](#) and [Development Regulations](#) for compliance with the Growth Management Act. The consultant will flag potential edits in the Plan and regulations and will complete the Department of Commerce's Periodic Update Checklist and Expanded Housing Checklist. The consultant will provide a summary, identifying changes and their rationales. A draft of the checklist is attached (attachment A).

Public Participation Plan

The consultant will prepare a public participation plan in coordination with the County that provides early and continuous opportunities for public engagement, fulfilling the requirements of RCW 36.70A.140. Engagement opportunities will be primarily online. To support public engagement and provide up-to-date information on the Comprehensive Plan Update, the County will establish and maintain a website for this project. The County is interested in working with a consultant that can translate some informational and online engagement materials, such as flyers and surveys, from English to Spanish. Public engagement activities will be conducted by both the County and the Consultant. The Consultant shall be responsible for addressing public inquiries relating to methodologies used for technical reports, specifically the Land Capacity Analysis, the Housing Needs Assessment and the Level of Service analyses for the Capital Facilities and Transportation elements. The Consultant will summarize engagement and show how engagement results will be incorporated into the Comprehensive Plan update.

Analyses

The consultant (or their approved subconsultant) will conduct a Land Capacity Analysis, a Housing Needs Assessment, and capital facilities and transportation level of service (LOS) analyses. The analyses will incorporate GMA requirements, new data, and established San Juan County standards.

Land Capacity Analysis: The consultant will prepare a land capacity analysis (Plan Appendix 1) for housing and employment. The land capacity analysis will evaluate urban, rural, agricultural resource, forest resource and mineral resource lands, taking account for growth allocations established in the Comprehensive Plan.

Housing Needs Assessment: The consultant will conduct a Housing Needs Assessment (Plan Appendix 5), including an allocation of housing needs by income bracket. The consultant will coordinate with the Town of Friday Harbor

and/or their consultant to determine the Town's housing allocations and needs. The Town of Friday Harbor is the County's only incorporated urban growth area.

LOS analyses will be conducted for capital facilities and transportation to ensure that facilities will meet projected needs.

SEPA checklist and threshold determination

Update Appendices

The consultant will update Plan appendices with the latest information and data. Additionally, the consultant will coordinate with the Town of Friday Harbor on any amendments to Appendix 2, Joint Planning Policies with the Town of Friday Harbor.

Draft Element Amendments

The consultant will reference previous work to draft amendments to the Plan Elements based primarily on recent changes to the GMA. This step will include working with County staff, the Planning Commission, and County Council to develop draft amendments. The County anticipates amendments to every element, ranging from new goals and policies to simple edits for internal consistency.

San Juan County is drafting its first Climate Element as part of the 2025 Comprehensive Plan Update. While the Climate Element will be drafted separately from this contract, it will need to be considered in SEPA review and finalized for incorporation in the final document.

Official Map Amendments

San Juan County does not have zoning maps. All land use designations and densities are established in the Comprehensive Plan Official Maps. The Comprehensive Plan update will likely involve amendments to the County's Official Maps due to the results of the Land Capacity Analysis, Housing Needs Assessment or other requests. The consultant will assist in identifying lands with potential for redesignation and assessing any map amendments proposed by the Town of Friday Harbor or members of the public. The consultant will assess proposals for consistency with the Comprehensive Plan and San Juan County Code 18.90.030 Amendments to Comprehensive Plan Official Maps. The consultant will document map amendment assessments in staff reports to inform the Planning Commission, County Council and public.

SEPA

The consultant will prepare an expanded SEPA checklist for non-project actions and a draft determination for the County to review and issue. The checklist and determination will pertain to all components of the Comprehensive Plan update, including all elements, appendices, and official map amendments. Though drafting the Climate Element is not included in this contract, SEPA review will include the Climate Element, which will be part of the final update ordinance.

Final Updated Comprehensive Plan

The consultant will incorporate final revisions into a Planning Commission draft and will prepare submittal materials in Word documents for the Commerce 60-day notice, including an updated checklist.

Draft Comprehensive Plan Update Ordinance

The Consultant will draft an ordinance for the Comprehensive Plan Update that reflects the proposed amendments and establishes compliance with all state requirements. A copy of the previous ordinance in Word can be provided upon request.

Legislative Process and Adoption

County staff will take the lead with the legislative process, including public hearings. The Consultant will develop presentation slides for County staff to use during the legislative process. After adoption, the Consultant will incorporate any edits into a final adopted version and will be responsible for final copy editing. The Consultant will deliver final plan section documents as Word documents and PDFs.

Development Code Amendments Table

Throughout the update, the consultant will develop a table of development code amendments needed to meet periodic update requirements and to implement new policies. The table will document specific development code amendments, their locations in San Juan County Code Title 18 Unified Development Code, and the Comprehensive Plan policy and/or GMA requirement the code amendments address.

Schedule

This contract is valid from the date of signing until June 30, 2025. The schedule for various project elements and their delivery will be determined based on proposals.

Budget

This project is funded by a Department of Commerce Periodic Update Grant. The budget for consulting services for this project is approximately \$150,000 for State Fiscal Year 2024 and \$150,000 for State Fiscal Year 2025.

Evaluation and Selection Process

The selection of a consultant for this project will be made from the respondents to this solicitation. All firms responding will be evaluated, scored and ranked. The top firms may be invited for interview and have references checked.

All proposal will be evaluated on the following items:

- (50%) General project approach including creative techniques;
- (25%) Qualifications of proposed project manager and project team;
- (15%) Proposed schedule of deliverables; and
- (10%) References and past performance, including ability to meet client needs, including but not limited to schedules and budgets.

Submittal Content Requirements

1. **Letter of Interest (1 page maximum):** Indicate interest and availability to address plan/scope elements, and current levels of general and professional liability insurance carried by the consultant.
2. **Project Approach and Scope Consideration (5 pages maximum):** Include a brief description of the consultant's philosophy, approach to the project, and value to the County.

Include key considerations to accomplish the General Scope of Work, as provided in the RFP. The consultant is encouraged to include suggestions or supplemental tasks which may enhance the project or streamline the scope of work and improve cost effectiveness.

3. **Schedule (1 page maximum).** Include a timeline or Gantt chart showing the estimated length of time required for completion of the tasks described in the General Scope of Work.
4. **Cost Summary (1 page maximum):** Provide a preliminary cost summary for each task to be completed as part of this project based upon the funding timeline and General Scope of Work presented above.
5. **Project Team (2 pages maximum):** Identify the proposed team, including subconsultants, qualifications, experiences, and references. Identify a project manager and principal contact who will be permanently assigned to the project (strongly preferred that they are one and the same person).
6. **Relevant Experience (2 pages maximum):** Describe the consultant's experience in preparing scope elements. Include at least three completed projects that are similar to the projects described in this request. For each project, provide the following information:
 - Name and location of each project;
 - Year completed;
 - Name and contact information of each client;
 - Name and contact information of the client project manager; and
 - Elements of the project that are like the General Scope of Work requested.
7. **Project Team Resumes:** Provide in an appendix to the proposal a one-page resume per team member, no page limit, or include at least a paragraph for each key team member, years of experience, education, certifications, company affiliation, workplace location, and a brief bulleted list of individual project experience.

Proposal Submittal Process

Consultants are encouraged to submit complete, concise and clear responses to this RFP. Documents shall have a minimum font size of 11 or greater. Proposals must be in digital format, with a maximum length of 14 pages excluding the letter of interest and include the project name: SJC 2045 Comprehensive Plan Update. The cover letter should have the following information: Firm name, Contact information (including email, mailing and street addresses, website URL and phone numbers), Name of Principal-in-Charge, and Project Manager and the name and primary contact, including a resume of all subconsultants.

All submittals must be received by 3:00 pm on Wednesday, February 7, 2024, at sophiac@sanjuancountywa.gov. No submittals will be accepted after that date and time. It is the consultant's sole responsibility to ensure that timely submittals are received.

All submittals become the property of San Juan County and will not be returned. San Juan County assumes no obligations of any kind for expenses incurred by any respondent to this invitation.

The County reserves the right to modify or cancel in part, or in its entirety, this RFP.

Anticipated Timeline for Consultant Selection

The County desires to select a consultant and complete contract negotiations by **February 28, 2024**.

February 7, 2024	Proposals due
February 14, 2024	Evaluation team selects finalist
February 28, 2024	Final scope and contract negotiations completed

Title VI Requirements

The selection of a consultant shall be made without regard to race, color, sex, age, religion, national origin or political affiliation. San Juan County is an Equal Opportunity Employer. San Juan County encourages disadvantaged, minority, and women-owned consultant firms to respond. San Juan County, in accordance with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 U.S.C. 2000d to 2000d-4 and Title 49, Code of Federal Regulations, Department of Transportation, subtitle A, Office of the Secretary, Part 21, nondiscrimination in federally assisted programs of the Department of Transportation issued pursuant to such Act, hereby notifies all bidders that it will affirmatively insure that in any contract entered into pursuant to this advertisement, disadvantaged business enterprises as defined at 49 CFR Part 26 will be afforded full opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, national origin or sex in consideration for an award.

Prospective consultants will be held to federal Equal Employment Opportunity requirements and Americans with Disabilities Act requirements. Persons with disabilities may request this information be prepared and supplied in alternate forms by contacting Sophia Cassam at (360) 370-7589.

Questions

Questions regarding this Request for Proposals should be directed to Sophia Cassam at (360) 370-7589 or sophiac@sanjuancountywa.gov.



Periodic Update Checklist for Fully-Planning Counties

Overview: This checklist is intended to help counties that are fully planning under the Growth Management Act (GMA) conduct the “periodic review and update” of **comprehensive plans** and **development regulations** required by [RCW 36.70A.130 \(4\)](#). 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).

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 update or through other amendments outside of the required periodic update process.

What’s new: For the 2024-2027 update cycle, Commerce has updated and streamlined periodic update resources including checklists, guidebooks and a [webpage](#) to serve you better. A checklist and guidebook for *partially-planning jurisdictions* will be available prior to their 2026-2027 updates. A separate checklist is available for cities.

2021-2022 Legislative Session:

[HB 1220](#) substantially amends housing-related provisions of the GMA, [RCW 36.70A.070\(2\)](#). Please refer to the following Commerce housing webpages for further information about the new requirements: [Updating GMA Housing Elements](#) and [Planning for Housing](#).

[HB 1241](#) changes the periodic update cycle described in [RCW 36.70A.130](#). Jurisdictions required to complete their update in 2024 now have until December 31, 2024 to finalize their review and submit to Commerce. Jurisdictions required to complete their updates in 2025-2027 are still required to submit prior to June 30th of their respective year. Additionally, jurisdictions that meet the new criteria will be required to submit an implementation progress report five years after the review and revision of their comprehensive plan.

[HB 1717](#) adds new requirements to [RCW 36.70A.040](#) regarding tribal participation in planning efforts with local and regional jurisdictions.

[HB 1799](#) adds a new section to the GMA, [RCW 36.70A.142](#), requiring some local governments to begin providing separated organic material collection services within their jurisdictions in order to increase volumes of organic materials collected and delivered to composting and other organic material management facilities.

[SB 5275](#) amends [RCW 36.70A.070\(5\)\(d\)](#) enhancing opportunity in limited areas of more intense rural development (LAMIRDs).

[SB 5593](#) adds new elements to [RCW 36.70A.130\(3\)](#) regarding changes to planning and/or modifying urban growth areas (UGAs).

County

Staff contact, phone + email

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 county 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 [Requirements and procedures for providing notice to the state](#) webpage.

Need help?

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

or contact:

Suzanne Austin, AICP

Senior Planner

Growth Management Services

WA Department of Commerce

509.407.7955

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Checklist Navigation

(Ctrl + Click each element)

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Comprehensive Plan

LAND USE

HOUSING

CAPITAL FACILITIES

UTILITIES

TRANSPORTATION

RURAL

SHORELINE

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PLAN & REGULATION AMENDMENTS

Section I: Comprehensive Plan Elements

Land Use Element

Consistent with countywide planning policies (CWPPs) and RCW 36.70A.070(1)

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
<p>New 2021-2022 legislation ESSB 5593: changes to RCW 36.70A.130 regarding UGA size, patterns of development, suitability and infrastructure.</p> <p>Coordinate these efforts with the affected cities.</p>	Section B, Element 2- Land Use and Rural, 2.3 Urban Growth Areas, Policy #3	Yes	Need to incorporate changes to qualifications for UGA expansion/alteration including review of patterns of development
<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 multi-county planning policies. RCW 36.70A.210 WAC 365-196-305</p>	Section B, Element 1 Governance, 1.2 Goals and Policies, #7 And Appendix 2	Yes	We need to amend several joint planning policies due to recent County development code changes.
<p>b. A future land use map showing city limits and UGA boundaries. RCW 36.70A.070(1) and RCW 36.70A.110(6) WAC 365-196-400(2)(d), WAC 365-196-405(2)(i)(ii).</p>	Yes Comp plan maps signed 01/10/23	No	The maps meet the current statute, but the County and Town of Friday Harbor anticipate official map amendments after we have the results of our respective land capacity analyses
<p>c. Urban Growth Area review: based on the population projection made for the County by OFM, the county and each city must include areas and densities sufficient to permit the urban growth projected to occur in the county or city for the succeeding twenty year period, except UGAs completely within a national historic reserve. RCW 36.70A.110(2&6), RCW 36.70A.130, WAC 365-196-310</p>	No	Yes	County expected to adopt updated population projections on December 12, 2023. New land capacity analysis due in 2024. UGA size remains the same until there is a justification for expanding them.

Section I: Comprehensive Plan Elements

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
d. If there is a UGA expansion into the 100-year floodplain of a river segment that is located west of the Cascade crest and when the river has a Sectmean annual flow of 1,000 or more cubic feet per second, it meets the statutory exceptions to the general ban on such UGA expansions. RCW 36.70A.110(8)	No	No	There are no rivers in the County.
e. Consideration of urban planning approaches that increase physical activity. RCW 36.70A.070(1) and WAC 365-196-405(2)(j) . Additional resources: Transportation Efficient Communities , The Washington State Plan for Healthy Communities , Active Community Environment Toolkit	Yes Section B, Element 2, Section 2.2.M and Appendix 11, Parks, trails, and Natural Areas Plan and Nonmotorized Plan.	Yes	Existing UGAs are compact and walkable. Additional sidewalks are needed in Eastsound but more so in Lopez Village
f. A consistent population projection throughout the plan which should be consistent with the county's sub-county allocation of that forecast and housing needs. RCW 36.70A.115 , RCW 43.62.035 and WAC 365-196-405(f)	No.	Yes.	Plan has 2017 population projection. The County is expected to adopt new 2045 projection December 12, 2023.
g. Estimates of population densities and building intensities based on future land uses and housing needs. RCW 36.70A.070(1) , WAC 365-196-405(2)(i) <ul style="list-style-type: none"> For counties 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 	Yes Appendix 1, Land Capacity Analysis	Yes	The LCA needs to be updated for the 2045 projected population

Section I: Comprehensive Plan Elements

Buildable Lands Program page.			
	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
h. Provisions for protection of the quality and quantity of groundwater used for public water supplies. RCW 36.70A.070(1) ; WAC 365-196-405(1)(c) ; WAC 365-196-485(1)(d)	Yes Section B, Element 2, Section 2.2A(10); Section 2.2.F(5); Section 2.2.(K) (6)	Yes	
i. 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	Section B, Element 2- Land Use and Rural 2.2 General Goals and Policies	No	
j. Identification of open space corridors within and between urban growth areas, including lands useful for recreation, wildlife habitat, trails, and connection of critical areas. RCW 36.70A.160 and WAC 365-196-335	Section B, Element 2- Land Use and Rural 2.2.I Open Space and Scenic Resources,	No	
k. Criteria for designating natural resource lands consistent with minimum guidelines to classify agricultural, forest, mineral lands and critical areas? RCW 36.70A.050 , WAC 365.190	Yes Element 2, section 2.4	Yes	MRLO policies need revision for consistency with code

Section I: Comprehensive Plan Elements

<p>I. Policies for agriculturally designated lands limiting nonagricultural uses to lands with poor soils or otherwise not suitable for agricultural purposes, and policies limiting the allowable range of accessory uses to those allowed by statute. RCW 36.70A.177(3)</p>	<p>Yes, Element 2, section 2.4</p>	<p>No</p>	
	<p>In Current Plan? Yes/No If yes, cite section</p>	<p>Changes needed to meet current statute? Yes/No</p>	<p>Notes</p>
<p>m. Policies encouraging the conservation of productive forest and agricultural lands and discouraging incompatible uses. RCW 36.70A.020(8), WAC 365-190-050, WAC 365-196-815</p>	<p>Element 2, Section 2.4, Subsections a and b. SJCC 18.30.040 identifies compatible development SJCC 18.30.52 includes right to farm and forestry provisions</p>	<p>No</p>	<p>There are policies for identifying and conserving forest and agricultural resource lands. There are policies to help identify the conservation of forest and agricultural resource lands.</p>
<p>n. If there is an airport within the county: 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 Note: The plan (and associated regulations) must be filed with the Aviation Division of WSDOT. WAC 365-196-455</p>	<p>Yes and no. Element 2, Section 2.6(C). SJCC 18.30.540 SJCC 18.40.031 SJCC 18.40.032</p>	<p>yes</p>	<p>There are general use airports on Lopez, Orcas and San Juan Island. There are airstrips on non-ferry served islands. Eastsound Airport has an airport overlay that limits incompatible developments.</p>

Section I: Comprehensive Plan Elements

<p>o. 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) and WAC 365-196-405(2)(e)</p> <p>Note: RCW 90.56.010(27) defines waters of the state.</p> <p>Additional resources: Protect Puget Sound Watersheds, Building Cities in the Rain, Ecology Stormwater Manuals, Puget Sound Partnership Action Agenda</p>	<p>Section B, Element 4- Water Resources 4.2.2 Coordinated Water System Planning, 4.4 Ground and Surface Water Protection, 4.5 Storm and Surface Water Management</p>	<p>Yes</p>	<p>Add guidance for corrective actions</p>
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	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
<p>p. 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 county 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> <p>Note: a voluntary stewardship program is an alternative for protecting critical areas in areas used for agricultural activities. RCW 36.70A.700 through .904. Visit the WA State Conservation Commission (SCC) VSP webpage</p>	<p>Section B, Element 2- Land Use and Rural 2.2F Natural Resource Conservation, 2.6.A Critical Areas, Section B, Element 4- Water Resources 4.6 Natural Resources, 4.7 Goals and Policies</p>	<p>yes</p>	<p>Revisions expected with CAO update</p>
<p>q. If forest or agricultural lands of long-term commercial significance are designated inside a UGA, there must be a program authorizing transfer (or purchase) of development rights. RCW 36.70A.060(4), RCW 36.70A.170</p>	<p>No</p>	<p>No</p>	<p>The County does not have resource lands inside UGAs</p>
<p>r. 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>	<p>No</p>	<p>No</p>	<p>The County does not have military bases</p>

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
<p>s. New section RCW 36.70A.142; new 2021-2022 legislation HB 1799: Development regulations newly developed, updated, or amended <i>after January 1, 2025</i> 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).</p> <p>See also RCW 36.70.330. For applicability, see RCW 70A.205.540.</p>	No	Yes	

Housing Element

In the 2021 legislative session, [HB 1220](#) 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 webpages for further information about the new requirements:

[Updating GMA Housing Elements](#) and [Planning for Housing](#)

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
a. Goals, policies, and objectives for the preservation, improvement, and development of housing. RCW 36.70A.070(2)(b) and WAC 365-196-410(2)(a)	Yes B.5 Housing Policy 5.7.B.2 Goal 5.7.A.3 Goal 5.7.A.4	No	There are goals and policies for improving housing conditions, reducing costs of maintaining existing homes and constructing new units,
b. Within an urban growth area boundary, consideration of duplexes, triplexes, and townhomes. RCW 36.70A.070(2)(c) amended in 2021, WAC 365-196-300	No B.5 Housing Policy 5.7.A.1.1 Policy 5.7.B.7.1	Yes	We have policies supporting multi-family housing, but none specifically for moderate density housing such as duplexes, triplexes, and townhomes.
c. Consideration of housing locations in relation to employment locations and the role of ADUs. RCW 36.70A.070(2)(d) amended in 2021	No B.5 Housing Policy 5.7.B.7.8	Yes	There is one policy about exploring ways to better utilize ADUs as longterm affordable housing. We need policies encouraging development of ADUs in UGAs. Policies generally direct growth toward UGAs, which are employment centers, but we need more policy language directly tying focused housing development to employment centers.
d. An inventory and analysis of existing and projected housing needs over the planning period, by income band, consistent with the jurisdiction’s share of housing need, as provided by Commerce. RCW 36.70A.070(2)(a) amended in 2021, WAC 365-196-410(2)(b) and (c)	No Appendix 5 Housing Needs Assessment	Yes	Need to conduct an assessment of housing needs by income band using Commerce’s HAPT tool
e. 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, permanent supportive housing.	No B.5 Housing Policy 5.7.A.1.3 Goal 5.7.A.2 Appendix 5 Housing Needs Assessment	Yes	Policies should be developed to specifically call out the housing types listed in RCW 36.70A.070(2)(c) . The LCA and HNA should identify housing capacity for income bands and for housing types.

Housing Element

In the 2021 legislative session, [HB 1220](#) 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 webpages for further information about the new requirements:

Updating GMA Housing Elements and Planning for Housing

<p>RCW 36.70A.070(2)(c) amended in 2021, WAC 365-196-410(e) and (f)</p>			
	<p>In Current Plan? Yes/No If yes, cite section</p>	<p>Changes needed to meet current statute? Yes/No</p>	<p>Notes</p>
<p>f. Adequate provisions for existing and projected housing needs for all economic segments of the community. 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</p>	<p>Yes B.5 Housing 5.7.A.1.2</p>	<p>Yes</p>	<p>Policy lists moderate, low, very low and extremely low income households. Need to assess policies to ensure there are “adequate provisions” for housing types needed for income bands.</p>
<p>g. Identify local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing, including:</p> <ul style="list-style-type: none"> • Zoning that may have a discriminatory effect; • Disinvestment; and • Infrastructure availability <p>RCW 36.70A.070(e) new in 2021</p>	<p>No</p>	<p>YES</p>	<p>Assessment of existing County policies and regulations through an RDI, displacement, and exclusion in housing lens is needed</p>
<p>h. 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</p>	<p>No</p>	<p>Yes</p>	<p>The County needs to develop policies and regulations to address RDI, displacement, and exclusion in housing</p>

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
<p>i. 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.¹ RCW 36.70A.070(2)(g) new in 2021</p> <p>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. RCW 36.70A.070(2)(h) new in 2021</p>	No	Yes	We need to identify areas that may be at higher risk of displacement due to any land use designation changes or capital investments. Need anti-displacement policy.

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\(3\)](#), and include:

<p>a. The capital facility plan element must identified the transportation facilities, and public facilities and services needed to serve the UGA and the funding to provide the transportation facilities and public facilities and services. RCW 36.70A.130 amended in 2022 (see SB 5593)</p>	<p>Yes Appendix 7 Transportation facilities located in Appendix 6</p>	<p>Yes, update with any new facilities</p>	<p>Ensure alignment with the ROSS</p>
<p>b. Policies or procedures to ensure capital budget decisions are in conformity with the comprehensive plan. RCW 36.70A.120</p>	<p>Yes Element 7, goal and policies 7.2.C</p>	<p>Yes</p>	<p>Update with latest Capital Improvement Program</p>
<p>c. An inventory of existing capital facilities owned by public entities. RCW 36.70A.070(3)(a) and WAC 365-196-415(1)(a)</p>	<p>Yes, appendix 7</p>	<p>Yes</p>	<p>Verify and update facility capacities</p>

¹ This work should identify areas where anti-displacement tools may be applied, but may not need to be in the comprehensive plan. See Commerce's housing guidance: [Updating GMA Housing Elements - Washington State Department of Commerce](#)

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
d. 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.	Yes, appendix 7	Yes	Verify and update facility needs based on population and adopted LOS standards
e. 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) ²	Yes, appendix 7	Yes	need to update
f. A six-year plan (at least) 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)	Yes Appendix 7, attachment 3	Yes	Update with latest Capital Improvement Program. Note: 2021-2026 CIP is listed but missing from published document
g. 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	Yes Policy 7.3.A.4.b.i, 7.3.B.2.b.i, and 7.3.C.7.b.i	?	Element 7 contains this policy for solid waste, community water, and community sewage treatment facilities. LOS standards were removed for parks and rec facilities during the last update. Need to clarify whether LOS and this policy are required for P&R.
h. 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)	n/a	n/a	San Juan County does not collect impact fees

Utilities Element

Consistent with relevant CWPPs and [RCW 36.70A.070\(4\)](#). Utilities include, but are not limited to: sanitary sewer systems, water lines, fire suppression, electrical lines, telecommunication lines, and natural gas lines.

The general location, proposed location and capacity of all existing and proposed utilities. RCW 36.70A.070(4) and WAC 365-196-420	Yes Appendix 8	Yes	Need to update
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² Infrastructure investments should consider equity and plan for any potential displacement impacts.

Transportation Element

Consistent with relevant CWPPs and [RCW 36.70A.070\(6\)](#)

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
a. The transportation element must identify the transportation facilities, and public facilities and services needed to serve the UGA and the funding to provide the transportation facilities and public facilities and services. RCW 36.70A.130 amended in 2022 (see SB 5593)	Yes Appendix 6 and TIP	Yes	Add any new transportation facilities since last update. Ask public works to review for accuracy
b. An inventory of air, water, and ground transportation facilities and services, including transit alignments, state-owned transportation facilities, and general aviation airports. RCW 36.70A.070(6)(a)(iii)(A) and WAC 365-196-430(2)(c) .	Yes, Appendix 6	Yes	Add any new transportation facilities since last update. Ask public works to review for accuracy
c. Adopted levels of service (LOS) standards for all arterials, transit routes and highways. RCW 36.70A.070(6)(a)(iii)(B) and (C) , WAC 365-196-430	Yes, Element 6 throughout, including goal and policies 6.2.C. Appendix 6.	No	
d. Identification of specific actions to bring locally-owned transportation facilities and services to established LOS. RCW 36.70A.070(6)(a)(iii)(D) , WAC 365-196-430	Yes, Element 6 throughout, including goal and policies 6.2.C. Appendix 6.	No	
e. A forecast of traffic 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) , WAC 365-196-430(2)(f)	Yes, Appendix 6 Tables 1, 2, & 3 for roads	Yes	Need to update for 2045
f. A projection of state and local system needs to meet current and future demand. RCW 36.70A.070(6)(a)(iii)(F) and WAC 365-196-430(1)(c)(vi)	Yes, Appendix 6	Yes	Need to reassess based on traffic forecast and other transportation needs assessments

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
g. A pedestrian and bicycle component to include collaborative efforts to identify and designate planned improvements for pedestrian and bicycle facilities and corridors that address and encourage enhanced community access and promote healthy lifestyles. RCW 36.70A.070(6)(a)(vii) , WAC 365-196-430(2)(j)	No	Yes	Incorporate nonmotorized transportation into the Transportation Element, since the PTNA-NMT plan was replaced by the ROSS
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)	Section B, Element 6- Transportation, 6.2.A.3.c; 6.4 Marine Transport Goals and Policies, Goal 3, 6.4.B.10, .13, .15	No	
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)	Section B, Element 6- Transportation, 6.2.B Transportation Financing Goals and Policies, Section II Appendix 6	No	
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)	Yes 6-Year TIP	Yes	Attach a copy of the latest TIP when the Plan update is adopted
k. If probable funding falls short of meeting identified needs: 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) , WAC 365-196-430(2)(l)(iii)	Appendix 6, Section II, Transportation Financing (2020-2036) E, F	No	

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
<p>i. 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)</p>	<p>Yes, Element 6, section 6.1.C, goal 6.2.B.6, Policies in 6.4.B</p>	<p>No</p>	

Rural Element

Consistent with [RCW 36.70A.070\(5\)](#), [RCW 36.70A.011](#), [RCW 36.70A.030](#) (15, 16, and 17), and should consider [WAC 365-196-425](#). Rural lands are lands not included in urban growth areas or designated as agricultural, forest, or mineral resource lands.

<p>a. A rural element that:</p> <ul style="list-style-type: none"> • Establish patterns of rural densities and uses considering local circumstances, including a written record explaining how the rural element harmonizes the planning goals of the GMA and meets the requirements of RCW 36.70A.070(5); • Allows rural development, forestry and agriculture in rural areas; • Provides for a variety of rural densities, uses, essential public facilities and rural governments services; and • Includes measures that apply to rural development and protects the rural character of the area. <p>RCW 36.70A.030 (15), (16) and (17), RCW 36.70A.070(5), WAC 365-196-425</p> <p>Note: this subsection shall not be interpreted to permit in the rural area a major industrial development or a master planned resort unless otherwise specifically permitted under RCW 36.70A.360 and RCW 36.70A.365</p>	<p>Section B, Element 4- Land Use and Rural 2.5 Rural Lands</p>	<p>No</p>	
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	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
<p>b. Policies that limit urban services in rural areas. RCW 36.70A.110(4) amended in 2021</p> <p>Note: The plan may include optional techniques such as limited areas of more intensive rural development (LAMIRDs), clustering, density transfer, design guidelines, and conservation easements to accommodate rural uses not characterized by urban growth as specified in RCW 36.70A.070(5)(b), (d) amended in 2021 (SB 5275), WAC 365-196-425(4).</p>	Section B, Element 4- Land Use and Rural, 2.5.1 General Rural Goals and Policies, 2.5.2 Activity Centers ,	Maybe	Language could be stronger.

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.

<p>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</p>	Section B, Element 3 – SMP, 3.1A Relationship of this Element to the Unified Development Code	No	
<p>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 WA State Department of Ecology (Ecology) guidelines adopted pursuant to RCW 90.58.060.</p> <p>See Ecology's Shoreline planners' toolbox for the SMP Checklist and other resources.</p>	Section B, Element 3 – SMP, 3.2.C Critical Areas	No	

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
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) .	No	Yes	
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) .	n/a		

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 Land Use Element 2.2.B and Section B, Element 7 – 7.1.C Essential Public Facilities, Appendix 2, 2.2 Policies for Siting and Design of Essential Public Capital Facilities of County or State Wide Significance	No	The EPF goal and policies do not directly address any specific type of facility
b. Policies or procedures that ensure the comprehensive plan does not preclude the siting	Yes Land Use Element	No	

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)	2.2.B		
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Tribal Participation in Planning new in 2022 (see [HB 1717](#))
A federally recognized Indian tribe may voluntarily choose 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	No	Yes	Notify affected tribes that the Periodic Update has begun and that we welcome the opportunity to collaborate if they choose to participate. Add a policy in the Governance Element (or where applicable) regarding tribal participation
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	Yes	Consider adding a governance element policy stating that we will coordinate with affected tribes in planning when they notify us that they want to participate.

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 Although included in RCW 36.70A.070 amended 2017 “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.</p>	Yes, Element 10	This element will need to be edited for consistency with the new Climate Element.
<p>Parks and Recreation Although included in RCW 36.70A.070 amended 2017 “mandatory elements” a parks and recreation element is not required because the state did not provide funding to assist in developing local elements when this provision was added to the GMA. However, park, recreation, and open space planning are GMA goals, and it is important to plan for and fund these facilities.</p>	Yes The 6-year Recreation, Open Space, and Stewardship Plan (ROSS Plan) (2022) is adopted by reference in the Capital Facilities Element	

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
<p>Climate Change Mitigation & Resilience</p> <p>As of 2022, this optional element has not yet received state funding to aid local jurisdictions in implementation. Please visit Commerce's Climate Program page for resources and assistance if interested in developing climate mitigation and resilience plans for your jurisdiction.</p>	No	The Department of Environmental Stewardship is leading the development of San Juan County's first climate element and greenhouse gas reduction plan.
<p>Sub-Area Plans</p>	Yes Lopez Village, Eastsound, and Deer Harbor subarea plans	Council has expressed interest in updating the Lopez Village and Eastsound subarea plans during the Comp Plan periodic update. We should consider updating these concurrently but not as part of the comp plan update because they were adopted by their own ordinances and so that they can't stall the comp plan update if they are taking more time than expected.
<p>Other</p>		

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	No	Yes	Resolve issue with siting County Gov facilities outside FHUGA
b. All plan elements must be consistent with each other. RCW 36.70A.070 (preamble) and WAC 365-197-040	Yes	Yes	Revisions with 2025 update will require amendments for inter-element consistency
c. The plan must be coordinated with the plans of adjacent jurisdictions. RCW 36.70A.100 and WAC 365-196-520	No	Yes	Need amendments to Appendix 2, Joint planning policies with the Town of Friday Harbor

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.	Section C, Administration, 4 – Public Participation	No	
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 36.70A.390 New in 2021, (HB 1220 sections 3-5), WAC 365-196-650(4) 	Section C, Administration, 3– Plan Implementation and Amendments	No	

Consistency is required by the GMA

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
<p>c. 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>	<p>Section C, Administration, 3– Plan Implementation and Amendments, 3.1 Goals and Policies</p>	<p>No</p>	
<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>	<p>Section C, Administration, 2–Plan Administration, 2.2.7</p>	<p>No</p>	

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

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
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 with HB 1220)			
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)			
c. 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 counties. (HB 5235) , RCW 36.01.227 new in 2021			
d. 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.			

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
<p>e. 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>			
<p>f. Manufactured housing is regulated the same as site built housing. 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. See: National Manufactured Housing Construction and Safety Standards Act of 1974</p>			
<p>g. Accessory dwelling units: counties must adopt or amend by ordinance, and incorporate into their development regulations, zoning regulations and other official controls in RCW 36.70A.070(d)(iv), RCW 36.70A.696 amended in 2021, 43.63A.215(3) Watch for new guidance from Commerce on the GMS Planning for Housing webpage</p>			
<p>h. 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: tiny-home communities, 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. See also RCW 36.70A.545, WAC 365-196-300 and WAC 365-196-410(2)(e)(i)</p>			

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
<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.</p> <p>RCW 36.70A.410, RCW 70.128.140 and 150, RCW 49.60.222-225 and WAC 365-196-860</p>			
<p>j. Rural regulations allow innovative techniques such as clustering, density transfer, design guidelines, and conservation easements to support rural economic advancement, a variety of densities, and uses that are not characterized by urban growth and that are consistent with rural character. RCW 36.70A.070(5)(b) and (c) and WAC 365-196-425(5)</p>			
<p>k. 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>			

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
<p>i. 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.</p>			
<p>m. 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</p>			
<p>Shoreline Master Program Consistent with RCW 90.58 Shoreline Management Act of 1971</p>			
<p>a. Zoning designations are consistent with Shoreline Master Program (SMP) environmental designations. RCW 36.70A.480</p>			
<p>b. If updated to meet RCW 36.70A.480, 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 Master Programs Handbook webpage for additional resources.</p>			

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
<p>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.</p>			
<p>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</p> <p>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</p>			
<p>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)</p>			
<p>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</p>			

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 or CWPPs include a process for siting EPFs and ensure EPFs are not precluded. RCW 36.70A.200(2), (3), (5). 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>			

Subdivision Code

<p>a. Subdivision regulations are consistent with and implement comprehensive plan policies. RCW 36.70A.030(5) and 36.70A.040(4).</p>			
<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>			

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
<p>c. Preliminary subdivision approvals under RCW 58.17.140 are valid for a period of five or seven years (previously five years). See also RCW 58.17.170</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>			

Stormwater

<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>			
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	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
<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>			

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 wastes and reduction of methane gas (a greenhouse gas).

<p>New section RCW 36.70A.142; new 2021-2022 legislation HB 1799: Development regulations newly developed, updated, or amended <i>after January 1, 2025</i> 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)</p> <p>See also RCW 36.70.330. For applicability, see RCW 70A.205.540</p>			
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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, .060 amended in 2021, .070, .080, .090 amended in 2018 and .100. WAC 365-196-850 provides guidance on how impact fees should be implemented and spent.</p>			
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	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
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			
c. If adopted, limitations on impact fees for early learning facilities RCW 82.02.060 amended in 2021			
d. If adopted, exemption of impact fees for low-income and emergency housing development RCW 82.02.060 amended in 2021. See also definition change in RCW 82.02.090(1)(b) amended in 2018			

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.

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
<p>a. The transportation concurrency requirement includes specific language that prohibits development when level of service standards for transportation facilities cannot be met. RCW 36.70A.070(6)(b), WAC 365-196-840.</p> <p>Note: Concurrency is required for transportation, but may also be applied to park facilities, etc.</p>			
<p>b. Measures exist to bring into compliance locally owned 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). 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>			
<p>c. Highways of statewide significance (HSS) are exempt from the concurrency ordinance. RCW 36.70A.070(6)(a)(iii)(C)</p>			
<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>			

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
<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>			
<p>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.</p>			
<p>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</p>			
<p>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</p>			
<p>Regulations to Implement Optional Elements</p>			
<p>a. New fully contained communities are consistent with comprehensive plan policies, RCW 36.70A.350 and WAC 365-196-345</p>			
<p>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</p>			

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
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			
d. Regulations include procedures to identify, preserve, and/or monitor historical or archaeological resources. RCW 36.70A.020(13) , WAC 365-196-450			
e. Other development regulations needed to implement comprehensive plan policies such as energy, sustainability or design are adopted. WAC 365-196-445			
f. Design guidelines for new development are clear and easy to understand; administration procedures are clear and defensible.			
Project Review Procedures			
<p>Project review processes integrate permit and environmental review. RCW 36.70A.470, RCW 36.70B and RCW 43.21C.</p> <p>Resources include 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 			

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)			
b. Regulations define <i>emergency</i> for an emergency plan amendment. RCW 36.70A.130(2)(b) and WAC 365-196-640(4)			
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)			
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.			
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			
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) .			