



PLANNING COMMISSION AGENDA

City Hall – Council Chambers
865 SE Barrington Drive, Oak Harbor, WA 98277

TUESDAY, FEBRUARY 10, 2026

6:00PM

1. CALL TO ORDER/ROLL CALL:

Position	Member	Attendance		
Position 1	Jeffrey Ward	<input type="checkbox"/> In person	<input type="checkbox"/> Online	<input type="checkbox"/> Absent
Position 2	Kevin Wilson	<input type="checkbox"/> In person	<input type="checkbox"/> Online	<input type="checkbox"/> Absent
Position 3	<i>Cody Bakken</i>	<input type="checkbox"/> In person	<input type="checkbox"/> Online	<input type="checkbox"/> Absent
Position 4	<i>Vacant</i>	<input type="checkbox"/> In person	<input type="checkbox"/> Online	<input type="checkbox"/> Absent
Position 5	<i>Chair</i>	<input type="checkbox"/> In person	<input type="checkbox"/> Online	<input type="checkbox"/> Absent
Position 6	Ryan Bradley	<input type="checkbox"/> In person	<input type="checkbox"/> Online	<input type="checkbox"/> Absent
Position 7	<i>Vice Chair</i>	<input type="checkbox"/> In person	<input type="checkbox"/> Online	<input type="checkbox"/> Absent
Ex Officio	Bryan Stucky Council Member	<input type="checkbox"/> In person	<input type="checkbox"/> Online	<input type="checkbox"/> Absent

2. APPROVAL OF MINUTES:

- a) October 14, 2025 Regular Business Meeting

3. PUBLIC COMMENT

During this time, citizens may comment on subjects of interest not on the agenda or agenda items. To ensure comments are recorded properly, state your name clearly. Individual comments will be limited to three (3) minutes to ensure maximum participation during the 15-minute timeframe allotted for this item. Public Comment may also be submitted online at <https://www.oakharbor.gov/publiccomment> at least two (2) business days in advance of an advisory board meeting.

4. DISCUSSION/ACTION/PRESENTATION/REPORT ITEMS

- a) New Community Development Director Intro
- b) Selection of Chair and Vice Chair
- c) Countywide Planning Policy amendments
- d) Comprehensive Plan Elements: proposed updates

5. MEMBER COMMENTS

6. NEXT SCHEDULED MEETING DATE: March 10, 2026

7. ADJOURNMENT



ATTACHMENT 1

DATE: February 10, 2026
TO: City of Oak Harbor Planning Commission and Council Member Stucky
FROM: Stacie Pratschner, Community Development Director
SUBJECT: Introductions and 2026 Work Program

SUMMARY:

The purpose of this introductory memo is to familiarize the Planning Commission with new Community Development (“CD” or “Department”) staff, introduce this year’s Departmental Work Plan, and discuss the 2026 Planning Commission work program. The following outline describes these two topics in the context of the roles and responsibilities of the Commission.

TOPICS:

- ✚ New Staff and hirings (*5 minutes*)
 - Director
 - Associate Planner
 - Administrative Assistant
 - Code Enforcement
- ✚ City Councils 2026 Work Program for the Department (**Attachment A**) (*5 minutes*)
- ✚ City Councils 2026 Work Program for the Planning Commission (*10-15 minutes*)
 - Periodic Update of the Comprehensive Plan
 - Code Amendments
- ✚ Planning Commission Roles and Responsibilities (*5 minutes*)
 - RCW 35.63.080
 - RCW 36.70.040
 - Chapters 2.65 and 18.04 of the OHMC
- ✚ Parliamentary Procedure: Roberts Rules (*2-3 minutes*)
 - Processing Motions (**Attachment B**)
- ✚ Q&A

Attachment A

2026 CD Department Priorities

Project/Task	Dates	Comments
Hire open positions <ul style="list-style-type: none"> - Code Enforcement Officer - Administrative Assistant 	2026Q1-Q2	<ul style="list-style-type: none"> - Civil Code enforcement is currently under the authority of the PD pursuant to OHMC 6.25.060: switch authority to CDS (ORD with Council). - Update CE job description accordingly. - Update Admin Assistant job description.
2025-2045 Comprehensive Plan Periodic Update	2026Q1-Q4	Climate, Housing, Transportation, Infrastructure, Parks
Windjammer Park Windmill	2026Q1-2027Q1-Q2	Entitlements (Shoreline, Flood, CUP and VAR, Site Plan)
LAMA Permit Software	2026Q1-Q4	<ul style="list-style-type: none"> - Evaluate efficiency: user-friendliness of online portal; quality of vendor support; permit report generation.
Waterfront District Master Plan	2026Q1-Q4	Work with Council to begin implementing desired tools in adopted Vision to Action Plan: <ul style="list-style-type: none"> - Policy - Programming - Capital Improvements
Standard Operating Procedures (SOPs)	2026Q3-Q4	Map processes/procedures
Long Range / Code Work	2026Q1-Ongoing	<ul style="list-style-type: none"> - Flood Updates (policy discussions on CRS) - Zoning code work to accommodate infill/missing middle to accompany periodic update - Building code updates to align with current IRC and IBC

Attachment B

Processing motions in Robert's Rules



There are eight steps to processing ordinary motions in Robert's Rules. At the right time in the agenda, after the member has been recognized by the chair:

1. A member makes a motion.
2. Another member seconds the motion.
3. The chair states the motion.
4. Members discuss and/or amend the motion.
5. The chair restates the motion and calls for the vote.
6. The members vote on the motion.
7. The chair states the results of the vote, whether the motion passes or fails, and what happens as a result of the vote.
8. The chair states the next item of business.

KEY STEPS IN PROCESSING MOTIONS

When the chair states the motion in step #3, that is the official text of the motion. If a member believes that the chair didn't state the motion as they proposed it, the member should speak up right away and say so.

Once step #3 has occurred, the motion belongs to the whole group. The person who made the motion has the same rights as anyone else in the group, no more and no less.

Be careful, if someone proposes a "friendly amendment," not to turn to the maker and seconder and ask if they will accept it. See our article [Friendly amendment in Robert's Rules](#) for more information on how to handle this.

Again, when the chair restates the motion in step #5, that is the actual text that is being voted on.



Call for the negative vote in processing motions

In calling for the vote, it is important that the chair call for the negative vote. This principle goes back to 1604. Don't say, "All those in favor say 'aye.' Well, it's unanimous!"

Instead, call the vote like this:

Chair: *All those in favor say "aye."*

Members in favor: *Aye.*

Chair: *All those opposed say "no."*

Members opposed: *No.*

Chair: *The ayes have it and the motion passes, OR the noes have it and the motion fails.*

Announcing the result in processing motions

In announcing the result, note that there are three parts to the announcement:

- State whether "ayes" or "noes" have prevailed.
- State whether the motion passes or fails.
- State what will happen as a result of the vote.

It's important to include all these three steps so everyone is clear on what has been approved, and what will happen next.

Changing your vote while processing motions

A member may change their vote up until the moment when the chair announces the result. A member may also change their vote immediately after the announcement if the group agrees unanimously to allow this. Once the chair has gone on to the next item of business, the vote may not be changed.

Of course, a member may later propose other motions that could change the course of action, such as to Amend Something Previously Adopted, to Rescind, or to Reconsider.

Which motions are processed this way?

The eight steps are used for processing these motions:

- Main Motion (rank of 1)
- Primary Amendment (rank of 3)
- Refer to Committee (rank of 4)
- Postpone to a Certain Time (rank of 5)

Other motions vary in different ways: some cannot be amended, some cannot be debated, and so on. [Download our Motions Chart](#) for a listing of the motions and their ranks and chief characteristics.

In this example the group processes a Main Motion with no amendments:

Member A: *I move that we hold a cruise on Dino Bay.*

Member B: *I second the motion!*

Chair: *It has been moved and seconded that we hold a cruise on Dino Bay. We will now debate the motion. [debate]*

Chair: *Are you ready to vote?*

The motion is that we hold a cruise on Dino Bay. All those in favor say “aye.” All those opposed say “no.” The “ayes” have it, the motion passes, and we will hold a cruise on Dino Bay. The Social Committee will make the plans for this event. Our next item of business is...

Read our article [Precedence of motions in Robert’s Rules](#) to learn about the overall structure of motions in Robert’s Rules.

Read our article [Amendment in Robert’s Rules](#) to learn more about the challenging motion “To Amend.”

M 2

**CITY OF OAK HARBOR
PLANNING COMMISSION MEETING
OCTOBER 14, 2025 – 6:00 P.M.**

This meeting was hosted from the City of Oak Harbor – City Hall Council Chambers at 865 SE Barrington Drive, Oak Harbor, WA., and was recorded. The video counter number is in parentheses () for each agenda item.

1. CALL TO ORDER/ROLL CALL: (:00) Chairman Engelbrecht called the meeting to order at 6:00 p.m.

Position	Member	Attendance		
Position 1	Jeffrey Ward	✓ In person	Online	Absent
Position 2	Kevin Wilson	✓ In person	Online	Absent
Position 3	<i>Vacant</i>	In person	Online	Absent
Position 4	<i>Vacant</i>	In person	Online	Absent
Position 5	Joshua Engelbrecht, <i>Chair</i>	✓ In person	Online	Absent
Position 6	Ryan Bradley	✓ In person	Online	Absent
Position 7	Eddie Fry, <i>Vice Chair</i>	✓ In person	Online	Absent
Ex Officio	Councilmember Jim Woessner	✓ In person	Online	Absent

CITY STAFF PRESENT: City Administrator Sabrina Combs, Principal Planner Cac Kamak, and Senior Administrative Assistant Sarah Heller.

OTHERS PRESENT: Videographer Tim Shelley, Jr., Kimley Horn Consultant Erin O’Kelley.

2. APPROVAL OF MINUTES: (0:40)

- a. **September 9, 2025 Regular Business Meeting:** Commissioner Bradley **MOVED** to approve the September 9, 2025 meeting minutes, **SECONDED** by Commissioner Fry. With four votes in favor and one abstention, **MOTION PASSED.**

3. PUBLIC COMMENT: (1:25) There was one public comment received online and displayed.

4. DISCUSSION/ACTION/PRESENTATION/REPORT ITEMS:

a. **2025 Major Update to the Comprehensive Plan (3:00)**

Principal Planner Cac Kamak presented the Planning Commission with updates on the status of the work on the Comprehensive Plan. The elements currently planned for discussion are Parks and Recreation, Economic Development, Government Services, and Climate Resiliency. At the next Commission meeting, the Comprehensive Plan elements scheduled for discussion are Land Use, Housing, and Urban Growth Area. He also updated the commission on the EIS process that the City will be working through as well.

Commissioners Engelbrecht, Bradley, Fry, and Ward, as well we Councilmember Woessner, shared their respective questions and comments. Additional written feedback was submitted by Commissioner Ward and can be found attached to this document.

5. **MEMBER COMMENTS:** (1:44:45) Commissioner Engelbrecht asked about metrics that may be available regarding the number of people that watch the planning commission meeting videos. He also mentioned that there are two vacancies on the Commission.

6. **NEXT SCHEDULED MEETING DATE:** The Planning Commission's next meeting is scheduled for November 12, 2025. *(Note: Post-meeting, the November 12th meeting was cancelled. The following meeting is scheduled for December 9, 2025.)*

7. **ADJOURNMENT:** (1:48:40) Commissioner Fry moved to adjourn the meeting, seconded by Commissioner Ward. With all in favor, motion passed.

Minutes taken by Senior Administrative Assistant Sarah Heller.

DRAFT

ATTACHMENT 3

BEFORE THE BOARD OF COUNTY COMMISSIONERS OF ISLAND COUNTY, WASHINGTON

IN THE MATTER OF ADOPTING REVISED
COUNTYWIDE PLANNING POLICIES AFTER
REASSESSMENT FOR THE 2025
COMPREHENSIVE PLAN UPDATE

ORDINANCE NO. C- 51 -25
PLG- 006 -25

WHEREAS, Island County conducts planning activities in accordance with Chapter 36.70 RCW, the Planning Enabling Act; and

WHEREAS, the planning activities of Island County, and the planning activities of municipalities within Island County, are further regulated by the provisions of RCW 36.70A, the Growth Management Act (GMA); and

WHEREAS, the GMA requires that counties subject to the GMA adopt Countywide Planning Policies (CPPs) and further requires that these policies be developed with the cooperation of the municipalities within the county (RCW 36.70A.210(2)) and tribes that have ceded lands within the county (RCW 36.70A.210(4)); and

WHEREAS, CPPs are written policy statements used to establish a countywide framework from which county and municipal comprehensive plans are developed and adopted in order to ensure consistency between plans as required by RCW 36.70A.100 and RCW 36.70A.210(1); and

WHEREAS, CPPs are intended to improve coordination between governmental agencies and prevent redundant or conflicting actions; and

WHEREAS, in order to address the requirements of the GMA, Island County, and the jurisdictions within Island County, first adopted CPPs in 1992 which were subsequently revised in 1998, 1999, 2015 and 2017; and

WHEREAS, in the seven years since the CPPs were last revised the GMA has evolved through legislative changes, judicial interpretations, and Growth Management Hearings Board decisions; and

WHEREAS, the GMA does not specifically address amendments to the CPPs; however, Island County's CPPs include population projections and allocations to jurisdictions from the previous planning period. Island County's CPPs should be updated with each periodic update to properly plan for current population and housing allocations, to address countywide planning concerns, and to comply with current legal requirements; and

WHEREAS, the CPPs state that the document may be amended through approval by the Island County Board of County Commissioners, and ratified once the CPPs are adopted by a majority of the cities and towns within Island County; and

WHEREAS, the GMA requires that any jurisdiction contemplating changes to its comprehensive plan or development regulations notify the Washington State Department of Commerce at least sixty days prior to adopting the amendment (RCW 36.70A.106(1) & WAC 365-196-630(1)); and

WHEREAS, on December 22, 2023, Island County Planning and Community Development Department transmitted the draft CPPs to the Washington State Department of Commerce for review by State agencies; and

WHEREAS, after complying with procedures for amending the CPPs, the Board of Island County Commissioners adopted the amended CPPs on March 23, 2024, for the purposes of the 2025 comprehensive plan update, in which the County and municipal jurisdictions agreed to plan based on the 20-year population projection of 102,639. The City of Langley, City of Oak Harbor, and Town of Coupeville ratified; and

WHEREAS, accommodating the population growth projection requires accommodation of 8,717 new dwelling units. After analysis, 5,533 dwelling units were assigned to be accommodated in the City of Oak Harbor and its associated UGA. The City of Oak Harbor's Land Capacity Analysis demonstrated it could only accommodate 3,735 dwelling units in the city limits, leaving a deficit of 1,797 dwelling units.

WHEREAS, the County considered Oak Harbor's proposal for a UGA expansion and determined that the proposed expanded UGA could not reasonably be served by the City within the 20-year planning period without an annexation plan and adequate Capital Facilities Plan. Additionally, the City's plan did not include provisions for serving the existing UGA to support additional capacity; and

WHEREAS, the County and City agreed to pursue an Interlocal Agreement to annex 77.86 acres from the UGA into the City as part of the comprehensive plan updates. The lands identified for annexation represent a probable capacity of 257 units based on city zoning. Those units were added to the City's capacity (3,735) for a revised total of 3,992 dwelling units to represent the city limits. A deficit of 1,541 units remains.

WHEREAS, WAC 365-196-415(2)(d)(iii)(G) allows reassessment of population projections within the allowable Office of Financial Management range; and

WHEREAS, based on the results from the Land Capacity Analyses and absence of infrastructure and annexation plans to accommodate the remaining deficit, the County reassessed the population growth projections for the planning period, to achieve a reduction of 1,541 dwelling units in Oak Harbor's housing allocation; and

WHEREAS, the housing allocations for unincorporated Island County, the Town of Coupeville and the City of Langley did not change during this reassessment; and

WHEREAS, on December 3, 2025, the Planning Commission held a public hearing to consider public testimony on the reassessed population growth projection, housing allocations, and revised CPPs; and

WHEREAS, the Planning Commission's signed Findings of Fact and Recommendation on the CPPs is attached to the this ordinance as Exhibit "B"; and

WHEREAS, the Board of Island County Commissioners has reviewed the presentations by the Planning and Community Development Department Staff, the revised CPPs, and the Planning Commission's Findings of Fact and Recommendation; and

WHEREAS, the Board of Island County Commissioners concurs with the Planning Commission's Recommendation to adopt the revised and updated Countywide Planning policies following the reassessment of the population projection to 99,202; and

NOW, THEREFORE,

IT IS HEREBY ORDAINED that the revised Countywide Planning Policies as attached as Exhibit "A" are hereby adopted; and

BE IT FURTHER ORDAINED that the revised Countywide Planning Policies attached as Exhibit "A" shall replace and supersede all previous Countywide Planning Policies; and

BE IT FURTHER ORDAINED that this ordinance amends the population growth projection in Ordinance C-85-23 from 102,639 to 99,202; and

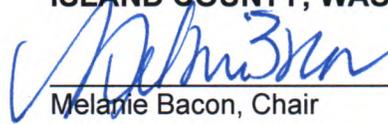
BE IT FURTHER ORDAINED that the attached Countywide Planning Policies shall have immediate effect after a majority of the jurisdictions in the Countywide Planning Group also ratify the Countywide Planning Policies; and

BE IT FURTHER ORDAINED that the Department of Planning and Community Development shall transmit a copy of this ordinance, and the attached Countywide Planning Policies, to the Washington State Department of Commerce; and

BE IT FURTHER ORDAINED that the Department of Planning and Community Development shall transmit a copy of this ordinance, and the attached Countywide Planning Policies to the legislative authorities representing Coupeville, Langley, and Oak Harbor, and their respective planning officials or authorities.

ADOPTED this the 10th day of December, 2025.

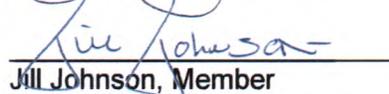
**BOARD OF COUNTY COMMISSIONERS
ISLAND COUNTY, WASHINGTON**



Melanie Bacon, Chair



Janet St. Clair, Member



Jill Johnson, Member



ATTEST:



Jennifer Roll
Clerk of the Board

BEFORE THE BOARD OF COUNTY COMMISSIONERS
OF ISLAND COUNTY, WASHINGTON

IN THE MATTER OF ADOPTING REVISED
COUNTYWIDE PLANNING POLICIES AFTER
REASSESSMENT FOR THE 2025
COMPREHENSIVE PLAN UPDATE

ORDINANCE NO.
C-51-25 PLG-006-25

WHEREAS, Island County conducts planning activities in accordance with Chapter 36.70 RCW, the Planning Enabling Act; and

WHEREAS, the planning activities of Island County, and the planning activities of municipalities within Island County, are further regulated by the provisions of RCW 36.70A, the Growth Management Act (GMA); and

WHEREAS, the GMA requires that counties subject to the GMA adopt Countywide Planning Policies (CPPs) and further requires that these policies be developed with the cooperation of the municipalities within the county (RCW 36.70A.210(2)) and tribes that have ceded lands within the county (RCW 36.70A.210(4)); and

WHEREAS, CPPs are written policy statements used to establish a countywide framework from which county and municipal comprehensive plans are developed and adopted in order to ensure consistency between plans as required by RCW 36.70A.100 and RCW 36.70A.210(1); and

WHEREAS, CPPs are intended to improve coordination between governmental agencies and prevent redundant or conflicting actions; and

WHEREAS, in order to address the requirements of the GMA, Island County, and the jurisdictions within Island County, first adopted CPPs in 1992 which were subsequently revised in 1998, 1999, 2015 and 2017; and

WHEREAS, in the seven years since the CPPs were last revised the GMA has evolved through legislative changes, judicial interpretations, and Growth Management Hearings Board decisions; and

WHEREAS, the GMA does not specifically address amendments to the CPPs; however, Island County's CPPs include population projections and allocations to jurisdictions from the previous planning period. Island County's CPPs should be updated with each periodic update to properly plan for current population and housing allocations, to address countywide planning concerns, and to comply with current legal requirements; and

WHEREAS, the CPPs state that the document may be amended through approval by the Island County Board of County Commissioners, and ratified once the CPPs are adopted by a majority of the cities and towns within Island County; and

WHEREAS, the GMA requires that any jurisdiction contemplating changes to its comprehensive plan or development regulations notify the Washington State Department of Commerce at least sixty days prior to adopting the amendment (RCW 36.70A.106(1) & WAC 365-196-630(1)); and

WHEREAS, on December 22, 2023, Island County Planning and Community Development Department transmitted the draft CPPs to the Washington State Department of Commerce for review by State agencies; and

WHEREAS, after complying with procedures for amending the CPPs, the Board of Island County Commissioners adopted the amended CPPs on March 23, 2024, for the purposes of the 2025 comprehensive plan update, in which the County and municipal jurisdictions agreed to plan based on the 20-year population projection of 102,639. The City of Langley, City of Oak Harbor, and Town of Coupeville ratified; and

WHEREAS, accommodating the population growth projection requires accommodation of 8,717 new dwelling units. After analysis, 5,531 dwelling units were assigned to be accommodated in the City of Oak Harbor and its associated UGA. The City of Oak Harbor's Land Capacity Analysis demonstrated it could only accommodate 3,735 dwelling units in the city limits, leaving a deficit of 1,797 dwelling units.

WHEREAS, the County considered Oak Harbor's proposal for a UGA expansion and determined that the proposed expanded UGA could not reasonably be served by the City within the 20-year planning period without an annexation plan and adequate Capital Facilities Plan. Additionally, the City's plan did not include provisions for serving the existing UGA to support additional capacity; and

WHEREAS, the County and City agreed to pursue an Interlocal Agreement to annex 77.86 acres from the UGA into the City as part of the comprehensive plan updates. The lands identified for annexation represent a probable capacity of 257 units based on city zoning. Those units were added to the City's capacity (3,735) for a revised total of 3,992 dwelling units to represent the city limits. A deficit of 1,541 units remains.

WHEREAS, WAC 365-196-415(2)(d)(iii)(G) allows reassessment of population projections within the allowable Office of Financial Management range; and

WHEREAS, based on the results from the Land Capacity Analyses and absence of infrastructure and annexation plans to accommodate the remaining deficit, the County reassessed the population growth projections for the planning period, to achieve a reduction of 1,541 dwelling units in Oak Harbor's housing allocation; and

WHEREAS, the housing allocations for unincorporated Island County, the Town of Coupeville and the City of Langley did not change during this reassessment; and

WHEREAS, on December 3, 2025, the Planning Commission held a public hearing to consider public testimony on the reassessed population growth projection, housing allocations, and revised CPPs; and

WHEREAS, the Planning Commission's signed Findings of Fact and Recommendation on the CPPs is attached to the this ordinance as Exhibit "B"; and

WHEREAS, the Board of Island County Commissioners has reviewed the presentations by the Planning and Community Development Department Staff, the revised CPPs, and the Planning Commission's Findings of Fact and Recommendation; and

WHEREAS, the Board of Island County Commissioners concurs with the Planning Commission's Recommendation to adopt the revised and updated Countywide Planning policies following the reassessment of the population projection to 99,202; and

NOW, THEREFORE,

IT IS HEREBY ORDAINED that the revised Countywide Planning Policies as attached as Exhibit "A" are hereby adopted; and

BE IT FURTHER ORDAINED that the revised Countywide Planning Policies attached as Exhibit "A" shall replace and supersede all previous Countywide Planning Policies; and

BE IT FURTHER ORDAINED that this ordinance amends the population growth projection in Ordinance C-85-23 from 102,639 to 99,202; and

BE IT FURTHER ORDAINED that the attached Countywide Planning Policies shall have immediate effect after a majority of the jurisdictions in the Countywide Planning Group also ratify the Countywide Planning Policies; and

BE IT FURTHER ORDAINED that the Department of Planning and Community Development shall transmit a copy of this ordinance, and the attached Countywide Planning Policies, to the Washington State Department of Commerce; and

BE IT FURTHER ORDAINED that the Department of Planning and Community Development shall transmit a copy of this ordinance, and the attached Countywide Planning Policies to the legislative authorities representing Coupeville, Langley, and Oak Harbor, and their respective planning officials or authorities.

ADOPTED this the _____ day of _____, 2025.

**BOARD OF COUNTY COMMISSIONERS
ISLAND COUNTY, WASHINGTON**

Melanie Bacon, Chair

Jill Johnson, Member

Janet St. Clair, Member

ATTEST:

Jennifer Roll
Clerk of the Board

EXHIBIT A

Countywide Planning Policies, Revisions [\(November 2025\)](#)
2025 Comprehensive Plan

Countywide Planning Policies 2025 Periodic Update

1. General Provisions

1.1 Purpose

The Washington State Growth Management Act (GMA) requires that cities and counties adopt comprehensive plans. The GMA further requires that counties adopt Countywide Planning Policies (CPPs) (RCW 36.70A.210 & WAC 365-196-305) to guide and coordinate issues of regional significance. The following goals and policies are intended to guide intergovernmental planning efforts, fully implement the planning goals identified in the GMA, and ensure that the actions of government agencies within Island County are coordinated and consistent with one another.

1.2 Applicability

These policies are intended to apply countywide. Any government agency or special service district within Island County that conducts planning activities or provides public services shall be subject to the goals and policies identified in these CPPs; specifically:

1. Planning policies and plans adopted or enforced by government agencies and special service districts shall be consistent with these goals and policies.
2. All decisions by government agencies and special service districts regarding the provision or construction of public services and facilities shall be consistent with these goals and policies.
3. These goals and policies should not be construed to otherwise reduce, diminish, or supersede those planning and land use powers reserved exclusively for the municipalities or Island County by Washington State law.

1.3 Definitions

The following definitions shall be used in the interpretation and application of the CPPs.

1. Affordable Housing: Unless the context clearly indicates otherwise, residential housing whose monthly costs, including utilities other than telephone, do not exceed thirty percent of the monthly income of a household whose income is: (a) For rental housing, 60 percent of the median household income adjusted for household size, for the county where the household is located, as reported by the United States department of housing and urban development; or (b) For owner-occupied housing, 80 percent of the median household income adjusted for household size, for the county where the household is located, as reported by the United States department of housing and urban development.

Countywide Planning Policies, Revisions ([November 2025](#))
2025 Comprehensive Plan

1. **Agency, Government:** The county government of Island County, a municipality within Island County, or a department or agency of the State of Washington.
2. **County:** The county government of Island County. This term is used throughout this document to differentiate between the jurisdictional limits of the government of Island County, and the geographic area encompassed by Island County.
3. **Development Regulation:** Controls placed on development or land use activities by the county or municipalities, including, but not limited to, zoning ordinances, critical areas ordinances, shoreline master programs, official controls, planned unit development ordinances, platting regulations, subdivision and short subdivision ordinances, and binding site plan ordinances together with any amendments thereto.
4. **Facility of Statewide or Countywide Significance:** Those facilities that are typically difficult to site, such as airports, state education facilities and state or regional transportation facilities as defined in RCW 47.06.140, regional transit authority facilities as defined in RCW 81.112.020, state and local correctional facilities, solid waste handling facilities, and inpatient facilities including substance abuse facilities, mental health facilities, group homes, and secure community transition facilities as defined in RCW 71.09.020. Public school facilities and municipal sewage treatment facilities shall also be considered facilities of statewide or countywide significance. Throughput transmission facilities and major utilities, as defined in Island County Code (ICC), shall not be considered facilities of statewide or countywide significance. This definition is intended to be used synonymously with the term “essential public facilities”.
5. **Future Planning Area (FPA):** An area immediately outside of, and adjacent to, a Non-Municipal Urban Growth Area. FPAs are designated by the county to reserve areas which may be necessary for future urban growth and to protect land which has been identified as resource land of long-term commercial significance, and land extensively constrained with critical areas, key entrance roads, and areas of historical significance. Broadly, such areas are intended to provide an opportunity for long-term planning beyond the normal twenty year planning horizon.
6. **Joint Planning Area (JPA):** Areas immediately outside of, and adjacent to, Municipal Urban Growth Areas. JPAs are jointly designated by the county and municipalities to reserve areas which may be necessary for future urban growth and to protect land which has been identified as resource land of long-term commercial significance, land extensively constrained with critical areas, key entrance roads, and areas of historical significance. Broadly, such areas are intended to provide an opportunity for long-term planning beyond the normal twenty year planning horizon.
7. **Municipality or Municipal:** A legally incorporated or duly authorized association of inhabitants of a limited area for local government or other public purposes. For purposes of interpreting this document, “municipality” or “municipal” is intended

Countywide Planning Policies, Revisions ([November 2025](#))
2025 Comprehensive Plan

to refer to the current incorporated jurisdictions in Island County (Coupeville, Langlely, and Oak Harbor) as well as any city or town incorporated after the establishment of these CPPs.

8. **Planning Goals or Planning Policies:** Statements, goals, and specific policies expressed in the GMA, CPPs, or a comprehensive plan adopted by the county or a municipality.
9. **Resource Lands of Long Term Commercial Significance:** Lands zoned Commercial Agriculture (CA) in accordance with the ICC and RCW 36.70A.170 and RCW 36.70A.050.
10. **Rural Area(s):** As used in this document the term “rural area” is intended to refer to all of the land area in Island County outside of Urban Growth Areas. Generally (with the exception of Rural Areas of More Intense Development), rural areas are intended to facilitate agriculture, forestry, and other resource dependent uses and activities which depend on rural resources and lands. Other uses may be permitted in the rural area when consistent with the GMA’s definition of rural character.
11. **Rural Area of More Intense Development (RAID):** Areas of existing more intense rural development designated by the county pursuant to RCW 36.70A.050(d) and WAC 365-196-425(6). This term is synonymous with, and intended to be used interchangeably with, the term “Limited Area of More Intense Rural Development” (LAMIRD) as used in the GMA. The Island County Comprehensive Plan contains a more complete definition as well as designation criteria for RAIDs.
12. **Rural Character:** Refers to patterns of land use and development established by the county in the Rural Element of the Island County Comprehensive Plan. For purposes of interpreting this document, the definition of rural character shall be the definition contained in the Island County Comprehensive Plan.
13. **Service, Public:** Includes fire protection and suppression, law enforcement, public health, education, parks and recreation, environmental protection, utilities, and other services or facilities provide by government agencies or special service districts. This term is synonymous with, and is intended to be used interchangeably with, the term “public facilities”.
14. **Service, Rural:** Those public services and public facilities historically and typically delivered at an intensity usually found in rural areas, and may include domestic water systems, fire and police protection services, transportation and public transit services, and other public utilities associated with rural development and normally not associated with urban areas. Rural services are those services necessary to support development which is consistent with the definition of rural character and do not include storm or sanitary sewers, except as otherwise authorized by RCW 36.70A.110(4).
15. **Service, Urban:** Those public services and public facilities at an intensity historically and typically provided in cities, specifically including storm and

sanitary sewer systems, domestic water systems, street cleaning services, fire and police protection services, transportation and public transit services, and other public utilities associated with urban areas and normally not associated with rural areas. Urban services are intended to accommodate and facilitate urban development consistent with the policies expressed in the comprehensive plans adopted by county and municipalities.

16. **Special Service District:** Independent governmental units that exist separately from local governments to provide public services to limited areas using public funds, including but not limited to sewer and water districts, fire districts, and school districts.
17. **Sprawl, Sprawling:** Scattered, poorly planned urban development that often occurs in urban fringe and rural areas. Generally, sprawl is neither reflective of urban character nor rural character. Sprawl occurs at densities too high to maintain rural character, but too low to provide the full range of social, economic, and cultural amenities typically associated with cities and towns. Sprawl is also characterized by forms of development which are difficult or costly to serve with high quality urban services.
18. **Urban Character, Urban Form:** Refers to a pattern of urban growth characterized by a high concentration of economic, social, and cultural amenities, as well as a full range of housing types and densities. Each municipality in Island County has adopted a comprehensive plan which is expressive of their desired urban Form and character.
19. **Urban Development, Urban Growth:** A pattern of growth that makes intensive use of land for the location of buildings, structures, and impermeable surfaces to such a degree as to be incompatible with the primary use of land for the production of food, other agricultural products, or fiber, or the extraction of mineral resources, rural uses, rural development, and natural resource lands designated pursuant to RCW 36.70A.170. Additionally, the term urban development includes all forms of development that are inconsistent with the county's adopted definition of rural character.
20. **Urban Growth Area (UGA):** Areas within which urban growth is encouraged and outside of which growth can occur only if it is consistent with rural character and not urban development or urban in nature. In Island County, UGAs have been established around each municipality.
21. **Urban Growth Area, Non-Municipal (NMUGA):** An area characterized by an extensive pattern of urban development which was established prior to the adoption of the GMA and which does not include an incorporated municipality. In Island County, a NMUGA has been established around the unincorporated area of Freeland in recognition of an existing pattern of urban development. The Freeland NMUGA is subject to the planning goals and policies set forth in the Island County Comprehensive Plan and the Freeland Subarea Plan.

22. Urban Growth Boundary (UGB): The line separating UGAs from surrounding rural areas. The UGB is intended to preserve rural character in rural areas and prevent low-density sprawling development by focusing and encouraging urban growth in designated UGA.

2. Countywide Planning Goals

Island County and the municipalities have identified the following goals as being of countywide concern. These goals are intended to establish a foundation for, and guide the interpretation of, the policies contained in this document. [Failure or inability to fully meet these goals shall not be construed to render the comprehensive plan or development regulations of any party to these policies invalid.](#)

1. **Intergovernmental coordination:** Island County, the City of Langley, the Town of Coupeville, the City of Oak Harbor, state agencies, and special service districts will work together to address issues of regional, or countywide, importance in a coordinated fashion. Proactive communication and coordination will improve the quality of planning activities and reduce the likelihood of disputes. Proactive outreach to tribes should be conducted to invite their participation in the updating of the CPPs.
2. **Joint City and County Planning:** Decisions regarding JPAs, UGAs, areas for future UGA expansions, and JPA overlay designations will be made by the county and municipalities in a cooperative fashion.
3. **Public Participation:** Island County citizens will be involved in the planning process and public comments will be considered by the county and municipalities before making planning decisions involving issues of countywide concern.
4. **Urban Growth Areas:** All decisions regarding the designation of new UGAs, adjustments to existing UGAs, population forecasting, and the allocation of population to UGAs will be made using clearly stated and rational criteria.
5. **Urban Development:** The social and economic vitality of Island County's cities and towns will be reinforced by ensuring that urban development occurs only within designated UGAs.
6. **Rural Development:** Island County's unique rural atmosphere and lifestyle will be protected from sprawling low density development and inappropriate uses; also, rural land use plans will ensure that permitted development is consistent with the availability of rural services and resources.
7. **Public Services:** Adopted land use and economic development plans will be reinforced and supported by public service and infrastructure investments. Decisions on infrastructure investments and the provision of public services will be made in a way which strengthens and reinforces adopted planning goals and policies.

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8. **Urban Services:** In order to protect and enhance the quality of life enjoyed by the residents of Island County's municipalities and UGAs, urban development will be provided with high quality urban services. The Municipalities will work to provide services at a level that promotes and fosters urban development in a manner consistent with their adopted planning goals and policies. Urban services will not be provided outside of UGAs to protect Island County's rural character and prevent scattered sprawling development patterns which are inefficient and costly to serve.
9. **Facilities of Countywide or Statewide Significance:** In recognition of the fact that some uses are difficult to site, but may be regionally significant or essential, the county, municipalities, and state agencies will work together to develop consistent policies and regulations governing, but not prohibiting these facilities.
10. **Transportation:** Island County should be served by an efficient, well connected, multimodal transportation system. Transportation plans, spending decisions, and regulations will be consistent with and reinforce adopted land use and economic development plans.
12. **Affordable Housing:** Housing affordable to all income levels will be planned for and accommodated throughout Island County including in rural areas, NMUGAs, and municipalities.
13. **Economic Development:** Develop a coordinated and diverse economic base that provides employment opportunities and improves the wellbeing of all economic segments of Island County's population. The county and municipalities will consider economic development broadly by incorporating planning policies throughout their planning documents that are supportive of a coordinated economic development strategy.
13. **Critical Areas:** The county and municipalities will work together to ensure that planning policies, and development regulations designed to protect Island County's natural resources and critical areas are consistent with one another.
14. **Historic Preservation:** Preserve and protect cultural resources as well as lands, sites, and structures that have historic or archaeological significance.
15. **Water Resources:** Protect the long-term viability of Island County's drinking water supply and the rights of Island County's existing residents, by considering the relationship between allowed densities and known and/or verifiable water supplies.
16. **Climate Resilience and Natural Disasters:** Ensure that comprehensive plans, development regulations, and regional policies, plans, and strategies under RCW 36.70A.210 and chapter 47.80 RCW adapt to and mitigate the effects of a changing climate; prepare for climate impact scenarios; foster resiliency to climate impacts and natural hazards; protect and enhance environmental, economic, and human health and safety; and advance environmental justice.

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17. **Public Health:** Promote the health of people of all ages and abilities by adopting policies and regulations that encourage safe, healthy habits, surroundings, and equitable access through the communities we plan, build, and preserve.

3. Countywide Planning Policies

The following policies are intended to facilitate the realization of the countywide goals identified above. These policies are further intended to guide the development of county and municipal comprehensive plans and development regulations where such plans and regulations involve issues of countywide concern.

3.1 General Provisions

1. Except as otherwise stated, municipalities shall be responsible for establishing long range plans and planning policies for UGAs. The municipalities shall also be exclusively responsible for regulating land use and development within the incorporated portions of UGAs.
2. Housing units in **municipal unincorporated** UGAs will be **attributed to** counted as part of the **municipality, not the** County's housing allocation.
- ~~3.2.~~ The county shall be responsible for regulating land use and development activities within unincorporated portions of UGAs; however, the county must coordinate and be consistent with the associated municipality ~~to ensure that any new uses authorized by a county permit or development regulation are consistent with the municipality's planning goals and policies~~, as well as any applicable CPPs.
- ~~4.3.~~ Growth and development within NMUGAs shall be planned for, managed, and regulated by the county.
- ~~5.4.~~ The county and the municipalities should coordinate where appropriate, the development and implementation of long-range plans for youth services, senior services, fire protection, police services, air quality, transportation, solid waste, public and private utilities, watershed and storm-water planning, and environmental plans for the protection of critical areas.
- ~~6.5.~~ Growth and development outside of UGAs shall be planned for, managed, and regulated by the county, except that planning within JPAs shall be subject to the JPA policies described below in section 3.2.
- ~~7.6.~~ The County will be the nominal lead for the State Environmental Policy Act (SEPA) review of the CPPs.

3.2 Joint Planning Area Policies

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1. For each UGA, the county and the municipality associated with the UGA shall collaboratively designate a JPA. Broadly, such areas are intended to provide an opportunity for long-term planning beyond the normal twenty-year planning horizon.
 - a. When identifying properties for inclusion in the JPA, the following shall be given first consideration:
 - i. Lands adjacent to the UGA;
 - ii. Lands adjacent to essential public facilities and urban services;
 - iii. Lands that facilitate connectivity to established or projected transportation corridors; and
 - iv. Lands where inter-jurisdictional long-term coordination would be beneficial due to the sensitive nature of adjacent uses.
 - b. When possible, resource lands of long-term commercial significance should be considered for exclusion from the JPA.
 - c. JPA boundary lines shall be drawn, wherever practical, in order to:
 - i. Be contiguous and not contain any holes;
 - ii. Follow street alignments, water courses, and other physical boundaries;
 - iii. Be kept straight, simple, and logical; and
 - iv. Follow parcel boundaries (not dividing a parcel).
2. The county and the municipality shall also collaboratively produce a long-term conceptual plan for the JPA as follows:
 - a. Two broad overlay designations shall apply within JPAs as follows; Potential Growth Areas (PGA) and Long Term Rural Significance (LRS). These designations need not be applied to all land within the JPA, land may be left undesignated; however, sufficient quantities of both PGA and LRS land should be designated to guide and control future development and UGA expansions.
 - b. The JPA overlay designation of PGA should be considered for lands which are:
 - i. Already characterized by urban development,
 - ii. Served by urban services, particularly sanitary sewer, or
 - iii. Determined by the municipality and the county to be the most logical and effective location to accommodate future UGA expansions.
 - c. Land should not be assigned a JPA overlay designation of PGA if such land meets the criteria for an LRS designation unless when such designation meets the criteria established in 3.2(2)(e) of this chapter.
 - d. JPA overlay designation of LRS should be considered for lands which are:

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- i. Extensively constrained by critical areas, flood hazards, or tsunami hazards, except when this land could be used to fulfill open space requirements;
 - ii. Determined by the county and/or municipality to have long-term cultural, scenic or environmental benefits, except when this land could be used to fulfill open space requirements;
 - iii. Resource lands of long-term commercial significance;
 - iv. Classified as forest lands or farm and agricultural lands and with property valuation at current use classification under RCW 84.34.020(2) or RCW 84.33.035; or
 - v. Within or in close proximity to Accident Potential Zones, and areas highly impacted by aircraft noise identified in Air Installations Compatible Use Zones (AICUZ) program noise contour maps.
 - e. JPA designations shall not be assigned in such a way that future UGA expansions are completely precluded, forestalled, or rendered impractical; areas must be provided to allow for future UGA expansions. Lands designated LRS may be considered for re-designation to PGA when:
 - i. A LRS designation would create a non-contiguous (“donut hole”) area of county land with future UGA expansions;
 - ii. A LRS designation would preclude, forestall, or make impractical the future and logical expansion of the UGA;
 - iii. A LRS designated area is located adjacent to or in close proximity to established or projected transportation corridors;
 - iv. A LRS designated area is needed to facilitate or provide access and connectivity to established or projected transportation corridors;
 - v. A LRS designated area is located adjacent to or in close proximity to essential public facilities or urban services;
 - vi. A LRS designated area is needed to facilitate the logical extension of urban services or for the siting of essential public facilities; or
 - vii. A LRS designated area is needed for the logical expansion of the UGA, and will be used to fulfill open space requirements.
 - f. Lands designated LRS that perform a critical recharging effect on aquifers used for potable water or lands which contain significant flood hazard areas should remain LRS when possible.
3. The county shall adopt the PGA and LRS designations as comprehensive plan overlay designations which will apply in addition to any underlying comprehensive plan or zoning designations.

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4. The county may adopt a FPA around the Freeland NMUGA and assign overlay designations in accordance with the criteria provided in Section 3.2.
5. A conceptual JPA plan should be prepared by the county in cooperation with each municipality consistent with the above criteria, the planning goals and policies expressed in this document, and any applicable county planning goals and policies. The county and municipalities should then work together to resolve any concerns prior to final adoption by the county.
6. Proposals to modify a UGA or JPA may be made by a municipality or the county. Modifications to JPA plans shall be subject to the procedures and criteria identified above and should generally be reviewed during the periodic update cycle mandated by the GMA or sooner if needed to ensure consistency with adopted criteria.
7. For lands assigned a designation of PGA, the county shall adopt planning policies which limit or restrict development that could interfere with the efficient utilization of such lands for future urban development. The county shall also adopt planning policies which provide municipalities notification of significant development proposals (such as land divisions, site plan approvals, or major transportation projects) within the JPA, and shall provide the affected municipality with the ability to comment on such proposals.
8. For lands assigned a designation of LRS the county shall adopt planning policies and which protect the agricultural, environmental, forestry, aesthetic, or cultural values of such lands.

3.3 Urban Growth Areas

Consistent with the provisions of RCW 36.70A.110, a UGA been established around each municipality. A NMUGA has also been established in Freeland in recognition of the fact that Freeland is already characterized by urban development. Existing UGAs may be modified when it can be demonstrated that the proposed modification is consistent with the following policies. These policies are intended to implement countywide planning goals 2.1, 2.2, 2.4, and 2.5 as well as GMA planning goals one, two, and four as provided for in RCW 36.70a.020.

1. The review of a UGA for possible expansion is a significant undertaking. Generally, UGAs should only be enlarged or modified during the periodic update process; however, UGAs may be modified outside of the periodic update process if necessary to accommodate major and unanticipated fluctuations in Island County's population, or if necessary to accommodate a large employer or institution which cannot reasonably be accommodated within an existing UGA.
2. UGAs may be expanded during a GMA mandated periodic update cycle if necessary to accommodate a 20 year supply of buildable land as required by RCW 36.70A.110.

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3. UGAs may be expanded outside of a GMA mandated periodic update cycle if the expansion is necessary for one of the following reasons. For purposes of interpreting these policies, “the start of the planning period” shall mean the date on which the most recent periodic update was completed.
 - a. Population growth in the UGA since the start of the planning period equals or exceeds fifty percent of the population growth allocated to the UGA at the start of the planning period; or
 - b. Employment growth in the UGA since the start of the planning period equals or exceeds fifty percent of the employment growth allocated to the UGA at the start of the planning period; or
 - c. Written notification is provided by the Department of Defense, or other reliable and verifiable information is obtained, indicating that prior to the next periodic update cycle, Naval Air Station Whidbey Island (NASWI) staffing will increase in a manner which would result in population growth equal to or exceeding fifty percent of the population growth allocated to the UGA at the start of the planning period; or
 - d. An opportunity is presented to bring a large scale business, industry, institution, or other significant employer to Island County, and the county and municipality agree that due to the facility or institution’s unique characteristics there is no suitable land available inside the current UGA.
4. UGAs shall be sized to include only the land necessary to accommodate twenty years of population and employment growth based on the methodology included in Appendix A. This methodology is intended to provide for a reasonable market factor.
5. In considering potential UGA expansion scenarios, municipalities should consider alternative measures such as increasing the densities allowed within their existing UGA or altering the uses allowed by their land use plan and zoning regulations. The viability of such measures should then be discussed with the county. In determining the viability of such alternative measures, the municipalities may consider a full range of economic, social, and real estate market factors.
6. After a thorough consideration of all other reasonable measures the UGA may be expanded in order to relieve a critical shortage of buildable land. If it is determined that an expansion or modification of a UGA is necessary, the UGA boundaries must be evaluated on a countywide basis, be based on a county population projection that does not exceed the Office of Financial Management (OFM) published ranges, and include an evaluation of the growth and housing allocations outlined in Appendix B.
7. Land shall be considered for inclusion within the UGA in the following order:-
 - a. Land with a JPA overlay identified as urban holding areas designation of PGA.

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- b. Land within a JPA which has not been assigned a JPA overlay designation except as provided for in 3.3.8.
 - c. Land with a JPA overlay designation of LRS which is not extensively constrained by critical areas; which does not contain significant flood or tsunami hazard areas; or which is not designated as resource lands or long-term commercial significance.
 8. Land which is extensively constrained by critical areas, which contain flood or tsunami hazard zones, or which is designated as resource land of long-term commercial significance, should be considered the lowest priority for inclusion within a UGA and should only be included within a UGA based on the following criteria:
 - a. The lands are needed to provide contiguity between PGA and other developable lands;
 - b. The lands will be preserved by their natural and environmental values with park or open space designations;
 - c. No other land exists which can reasonably be added to the UGA;
 - d. The land being considered can be reasonably served by urban services; and
 - e. A transfer of development rights (TDR) program has been enacted per WAC 365-196-815(1)(a).
 9. Under no circumstances shall a UGA be expanded into a designated tsunami or flood hazard area unless the land is assigned an extremely low intensity comprehensive plan designation such as park or open space.
 10. UGAs may be reduced in size if:
 - a. Revised population estimates or allocations indicate that that the existing UGA is larger than necessary to accommodate a 20 year supply of buildable land.
 - b. Densities within the UGA have been increased such that the UGA is larger than necessary to accommodate a 20 year supply of buildable land.
 - c. It is determined that urban services including public sewer and water cannot reasonably be provided to the area included in the proposed UGA reduction. Any UGA reduction proposed on the basis of this criterion shall ensure that any population currently allocated to the area included in the proposed reduction is redistributed elsewhere within the UGA, or to another UGA.
 11. UGAs may be modified by simultaneously including and excluding land so that the total area of the UGA is not altered, provided that land shall be considered for inclusion based on the criteria expressed in policies 3.3.5, 3.3.6, 3.3.7, 3.3.8, and 3.3.9 above.
 12. Land shall not be removed from a UGA if it is already characterized by urban development, permits have been issued authorizing urban development, or urban

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services have been extended into the area, unless the area is physically separated from and not adjacent to existing urbanized areas and would otherwise qualify as a RAID.

13. UGA modifications outside of the period update cycle may be proposed by a municipality, the county, or an individual. Modifications proposed by municipalities or individuals shall be submitted to the county in a manner consistent with the county's procedures for comprehensive plan amendments and placed on the county's annual review docket (per Chapter 16.26 ICC). Modifications proposed by individuals shall not be approved by the county unless the modification is supported by the legislative authority of the affected municipality.
14. For any proposed UGA modification a current land capacity analysis shall be prepared and shall utilize the procedures described in Appendix A. The land capacity analysis should be performed by the respective jurisdiction.

3.4 Urban Development

The following policies have been adopted to ensure that urban development occurs only within designated UGAs, and that urban growth is orderly, compact, contiguous, and adequately served by urban services. These policies are intended to implement countywide planning goals 2.4, 2.5, and 2.8 as well as GMA planning goals one, two, and twelve.

1. Urban development shall take place only within municipalities and UGAs/NMUGAs.
2. Each municipality shall prepare land use plans, planning policies, and development regulations for their UGA. These plans, planning policies, and development regulations shall be used to regulate development activities within the incorporated boundaries of the municipality. For land within a UGA, but outside the incorporated boundaries of a municipality, the county's planning policies and development regulations shall apply until such time that the land is annexed. Upon annexation the municipality's planning policies and development regulations shall apply.
3. Urban development shall be expressive of urban character. Planning policies and development regulations should be adopted by the county and the municipalities to ensure that urban development is not wasteful of land or resources, and that urban development proceeds in an orderly contiguous fashion.
4. Planning policies and development regulations shall be adopted which require that new development, including subdivisions, short subdivisions, site plan approvals, and building permits for new homes and commercial or industrial buildings within a designated UGA be served by public sewer and water.
5. Development regulations may be adopted by the municipalities or by the county, in the case of the Freeland NMUGA), variances or waivers may be granted from

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the above requirement in situations where public sewer and water cannot be provided economically due to topographical constraints or an inability to obtain the approval of intervening land owners. Waivers or variances shall not be used to permit land division.

6. The construction or installation of new private wells and septic systems within UGAs should be strongly discouraged and only allowed through a variance or waiver as described above in policy 3.4.5. When permitted, these systems should be considered an interim solution until public sewer or water service can be provided.
7. The municipalities and county agree that steps should be taken during each periodic update cycle to increase the percentage of Island County's overall growth occurring within UGAs. The municipalities and the county should work to foster, promote, and accommodate additional housing and job growth within existing UGAs and shall adopt policies to accomplish this objective.
8. Municipalities shall not annex land outside an UGA.
9. Land recently added to a UGA shall not be annexed until any appeal periods or proceedings associated with the UGA expansion have lapsed or been resolved.
10. Each municipality should include specific policies to guide the incorporation process in their comprehensive plans.
11. It is recognized that urban growth and development should be regulated by the municipalities. Accordingly, the following policies are intended to facilitate and encourage the annexation of land outside of existing municipal boundaries but within UGAs. These policies are also intended to ensure that urban development occurs in a logical, incremental, and rational fashion, and to prevent the county from authorizing development within a UGA which forestalls or frustrates future urban development or the realization of the municipality's planning goals and policies:
 - a. Land outside of existing municipal boundaries but within a UGA shall be assigned a county comprehensive plan and zoning designation of Urban Holding (UH) until such time that it is annexed by a municipality. Once the annexation process is complete, the municipality's planning policies, zoning designations, and development regulations shall be used to regulate development.
 - b. Island County will support the incorporation of NMUGAs and provide technical assistance as needed, provided that all annexation and incorporation proposals involving land associated with a NMUGA will be reviewed against the relevant incorporation/annexation criteria set forth in state law, including a thorough analysis of fiscal impacts.
 - c. In allocating projected growth to UGAs, priority should be given to UGAs over NMUGAs within the same planning area.

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- d. The county shall continue to work with local jurisdictions to adopt planning policies and development regulations that will facilitate anticipated urban development, annexation and the provision of urban services in those areas designated UH.
12. Incorporation proposals involving land outside the boundaries of a NMUGA shall not be supported or approved by the county.

3.5 Rural Development

1. All development outside of UGAs shall be consistent with the county's definition of rural character (ICC 17.03.040).
2. Allowed land uses in the rural areas should primarily be agricultural or low density residential in nature. In order to support the economic and social vitality of existing cities and towns, non-residential, non-agricultural uses in rural areas should generally be limited to small scale home businesses and non-residential uses which are directly related to, and supportive of, agricultural uses. Small scale recreation and tourist uses may also be appropriate in rural areas, and higher density housing and certain commercial uses may be permitted in the county's RAIDs. The county shall adopt planning policies.
3. In establishing allowed densities and uses in rural areas, the county shall consider the long-term availability of known and /or verifiable water supplies, the general suitability of the area for on-site septic systems, the presence of critical areas including geologically unstable areas, and flood or tsunami hazards.
4. The county shall plan for the timely and efficient provision of rural services.
5. In general, public facilities and buildings should not be located in rural areas unless their function or service area is best served by a location outside of a UGA.
6. The municipalities and the county have agreed that the percentage of growth occurring within UGAs should be increased. The county should adopt planning policies and development regulations in order to achieve this objective.

3.6 Public Facilities and Services

1. New urban services and facilities shall not be provided or extended outside of UGAs. In particular, sanitary sewer systems may not be extended outside of existing UGAs unless necessary to respond to a documented public health hazard caused by existing development which cannot be remedied in any other reasonable way.
2. Public services and facilities shall be provided in a manner which is consistent with, and helps to implement all aspects of locally adopted comprehensive plans and development regulations.

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3. Public services and facilities shall not be provided in a manner which is contrary to locally adopted comprehensive plans and development regulations.
4. Within UGAs, provisions must be made to ensure that necessary urban services are available or in place prior to, or concurrent with, urban development.
5. Consistent with GMA requirements, locally adopted comprehensive plans and development regulations shall specifically identify how urban services will be provided throughout UGAs.
6. With respect to services or facilities of regional significance, municipalities and the county should coordinate capital facilities planning and funding within UGAs.
7. The county and the municipalities will work together to implement, enforce, and update the Coordinated Water System Plan and any associated planning-policies or development regulations.
8. Public services and facilities should be located in areas which are accessible by all modes of transportation. In particular, public services serving low income or mobility impaired citizens should be located in close proximity to transit stops and in areas with a well developed network of sidewalks and paths.
9. In general, public facilities and buildings should not be located in rural areas. In evaluating the appropriate location for public buildings and facilities, sites should be considered in the following order of preference:
 - a. Sites within existing municipalities.
 - b. Sites outside of existing municipalities, but within UGAs.
 - c. Sites outside of an existing municipality, or UGA, but within a RAID.
 - d. Sites in rural areas, but only when it can be shown that the public service requires a location in a rural area due to its unique operational characteristics or service area requirements.

3.7 Facilities of Countywide or Statewide Significance

The county and the municipalities are required by the GMA (RCW 36.70A.200) to include provisions in their comprehensive plans and development regulations addressing essential public facilities. The following policies are intended to guide the designation, location, expansion, and modification of facilities of countywide or statewide significance and to ensure full compliance with GMA requirements.

1. The county and municipalities shall ensure that their planning policies and development regulations contain policies and procedures allowing for, and governing facilities of statewide or countywide significance.
2. The county and each municipality should establish a process through their comprehensive plans or development regulations for identifying and regulating

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the location and development of essential public facilities. These policies and regulations should, at a minimum, include:

- a. A process for determining whether or not a given facility or service meets the definition of an essential public facility.
 - b. A process, including specific criteria, for evaluating alternative locations.
 - c. Provisions to ensure that the environment, public health, and safety are protected.
 - d. For facilities outside of UGAs, provisions to ensure, to the extent possible, the facility is consistent with the county's adopted definition of rural character.
3. To the extent possible, essential public facilities should be located in a manner which is consistent with, and supportive of adopted land-use, transportation, and economic development plans.
 4. Essential public facilities shall be located within a UGA unless it can be demonstrated that a rural location is the most appropriate location based on the specific characteristics and operational needs of the facility. Mere convenience or expediency is not sufficient to demonstrate compliance with this requirement.
 5. Essential public facilities located outside of a UGA should be self contained and should not require the extension or provision of urban services. In the event that it is absolutely necessary to extend urban services to allow for the establishment of an essential public facility that would otherwise be impossible to establish, urban services shall be provided in a manner which precludes further extension or connections in the intervening areas. In such instances, the extension of urban services shall not be used to service rural development or to justify future UGA expansions that could not otherwise be supported by the policies of this document.
 6. The county and municipalities shall not preclude the establishment or provision of an essential public facility when proposals for such services or facilities are consistent with these policies, as well as any planning policies and development regulations adopted by the county or municipalities regulating essential public facilities.
 7. The county, in collaboration with the affected municipality shall review proposals for facilities of countywide or statewide significance in UGAs, taking into consideration these policies, as well as applicable county and municipal policies and regulations.

3.8 Transportation

1. The transportation element of the county's comprehensive plan should include UGA components to ensure consistency among planning jurisdictions. All transportation planning, including that of federal or state agencies, and port

- districts, should be jointly and cooperatively developed, adopted and implemented through coordinated and collaborative planning efforts.
2. The county and municipalities should each actively participate in multi-county, multi-jurisdiction, regional transportation planning, including planning for Washington State Ferries.
 3. The county and municipalities will cooperate in the analysis of, and response to, any major industrial, retail, commercial, recreation, or residential development proposal that may impact the transportation systems in Island County.
 4. The capacity of the transportation system must be planned, built, and managed to meet planned land use densities in UGAs.
 5. The planned transportation system should be implemented in a coordinated and cost effective manner utilizing a fair and sufficient method of funding.
 6. The county and municipalities shall work together in identifying and preserving transportation corridors in JPAs and unincorporated UGAs. The location and extent of such corridors should be based on the street classifications and/or future street maps recommended or identified in the Transportation Elements of municipal comprehensive plans.
 7. The purchase of right-of-way, or the construction of transportation projects necessary to facilitate urban development, within unincorporated UGAs shall be the responsibility of the municipality associated with the UGA.
 8. The county and municipalities will coordinate their respective transportation plans for consistency and interconnectedness in JPAs and unincorporated UGAs. For developments occurring in a JPA or an unincorporated UGA, that may impact future transportation corridors, the County will notify the municipality responsible for the UGA or JPA of the development and provide the municipality with an opportunity to comment on the proposal.
 9. Pursuant to RCW 36.70A.430, a multi-jurisdiction environmental and permitting process should be established for reviewing and coordinating state and local permits for transportation projects that cross municipal or county boundaries. This policy may be carried out through the development of inter-local agreements with the municipalities within Island County as well as adjoining counties and municipalities.

3.9 Housing

In order to meet the need for affordable housing and to accommodate the housing needs for all economic segments of the population (per the State's requirements in RCW 36.70A), the county and municipalities will consider the following policies in the development of locally adopted comprehensive plans (refer to Appendix B for details on housing allocations and methodology):

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1. A wide range of housing development types and densities throughout Island County shall be accommodated to meet the needs of a diverse population and provide affordable housing and lifestyle choices for all;
2. Manufactured home parks at urban densities, should be located within UGAs and/or RAIDs;
3. Multi-family housing should be located within UGAs and/or RAIDs;
4. Publicly funded emergency housing and permanent supportive housing should be located in close proximity to employment centers, transit stops, and other public services.
5. The comprehensive plans of the county and the municipalities should consider the following housing policies:
 - a. Development of single-room occupancy housing, planned residential developments, and accessory dwelling units;
 - b. Establishment of a public/private housing trust fund to provide loans and grants for development of low to moderate income housing and housing for persons with special needs;
 - c. Identification of publicly owned properties within UGAs or RAIDs that could serve as possible sites for the development of affordable low income housing; and
 - d. Identification of regulatory relief actions such as inclusionary zoning, density bonuses for the development of lower-cost housing or in-lieu payments into a housing trust fund, forgiveness of impact or mitigation fees for low-income housing as authorized under the GMA or priority permit process treatment of housing developments intended for or including affordable housing.
6. Provisions for housing affordable to all income levels will be required elements of the housing, land use, economic development and comprehensive plans of the county and municipalities.

3.10 Land Use & Public Health

Access to clean air and water, healthy food, affordable housing, adequate transportation, and opportunities for physical activity, are all key factors that contribute to a positive quality of life. The GMA encourages the availability of affordable housing, efficient multimodal transportation systems, retaining open spaces, enhancing recreational opportunities and requires communities to plan for bicycle and pedestrian transportation and physical activity. Establishing a deliberate connection between land use and public health will assist the county and the municipalities in realizing these GMA objectives. Therefore, it is the policy of the county and the municipalities that the following policies should be considered when developing or revising county or municipal planning policies and development regulations:

1. Roadway systems should be planned, built, and managed to encourage alternative transportation modes to the single-occupant vehicle. Transportation systems should support active, independent mobility for users of all ages and abilities, including children, youth, families, older adults, and individuals with disabilities. Each jurisdiction should encourage:
 - a. Use of public transportation;
 - b. Development of linked on-street bicycle routes and pedestrian and bicycle corridors;
 - c. Adequate pedestrian facilities; and
 - d. Provisions for connections between different modes of transportation.
2. Development within UGAs should encourage enhanced community access and promote healthy active lifestyles through:
 - a. An appropriate mix of land uses and intensities of land uses;
 - b. Well connected street grids;
 - c. Non-motorized access to transportation;
 - d. Appropriate pedestrian and bicycle facilities that allow for safe travel; and
 - e. Regionally connected trail systems.
3. A countywide system of non-motorized trails should be established in accordance with the Island County Non-Motorized Trails Plan. Trail development should be completed through regional collaboration and prioritize linking multi-modal transportation, schools, urban development, places of employment, and recreational facilities.
4. Residents should have adequate access to “open space” areas. Open spaces include land which contains natural areas, habitat lands, natural drainage features, and/or other environmental, cultural and scenic resources. Such land should be preserved and provided to residents for recreational use when appropriate. Open spaces should be linked to non-motorized transportation and public transportation.
5. Residents should have access to healthy food choices. Consideration should be given to establishing land use patterns and development regulations that support such access. Land use and development regulation amendments should consider the potential to remove existing barriers to healthy food choices, if they exist. Home and community gardens within UGAs should be encouraged and supported through design and permitting processes.
6. Access to affordable housing influences, and is influenced by, residents health. Housing services should be planned with collaboration of health and economic development expertise. Development of multi-family affordable housing should be encouraged near major employment opportunities, public services including

healthcare, public transportation, retail providing healthy food options, and open spaces such as parks and trails.

3.11 Economic Development & Employment

To ensure future economic vitality, broaden employment opportunities, and meet the needs of projected growth while retaining a high-quality environment, the county and the municipalities have determined that the following policies should guide local economic development planning efforts:

1. Economic growth should be encouraged within the capacities of the county's natural resources, public services and public facilities;
2. The Economic Development Element of the Island County Comprehensive Plan and the comprehensive plans of the municipalities should, at a minimum:
 - a. Consider the goods, services and employment requirements of existing and projected population;
 - b. Identify the land use, infrastructure, transportation, and labor market requirements of businesses which have the highest probability of economic success in Island County and the least negative impact on the quality of life;
 - c. Based on citizen input, existing land use patterns, and local capacity (geographic environmental and other considerations), determine areas suitable for retail, commercial and industrial uses; and
 - d. Encourage expansion of the tax base to support the infrastructure and services required to support a growing or changing population.
3. Future retail, commercial, and industrial development should be encouraged in UGAs and RAIDs as identified in the comprehensive plans adopted by the county and municipalities.
4. Land use regulations and infrastructure plans of the county and municipalities should be amended or developed in a manner that supports economic development elements of locally adopted comprehensive plans.
5. Economic development in each of Island County's planning areas should proceed in a coordinated fashion consistent with locally adopted comprehensive plans and development regulations.
6. The county, municipalities, and port districts should work collaboratively to address issues of intergovernmental coordination and overlapping responsibility.

4. Administration and Implementation

The purpose of this section is to ensure that the CPPs are administered jointly in a collaborative fashion by the county and municipalities.

4.1 Countywide Planning Group

1. A Countywide Planning Group (CPG) shall be formed for the purpose of discussing and coordinating countywide planning issues. This group shall be comprised of representatives from the planning departments of Coupeville, Island County, Langley, and Oak Harbor.
2. The CPG shall meet at least two times each year or more frequently as needed.
3. Matters of overlapping concern or jurisdiction should be discussed by the CPG before being advanced for legislative approval by the county or municipalities.

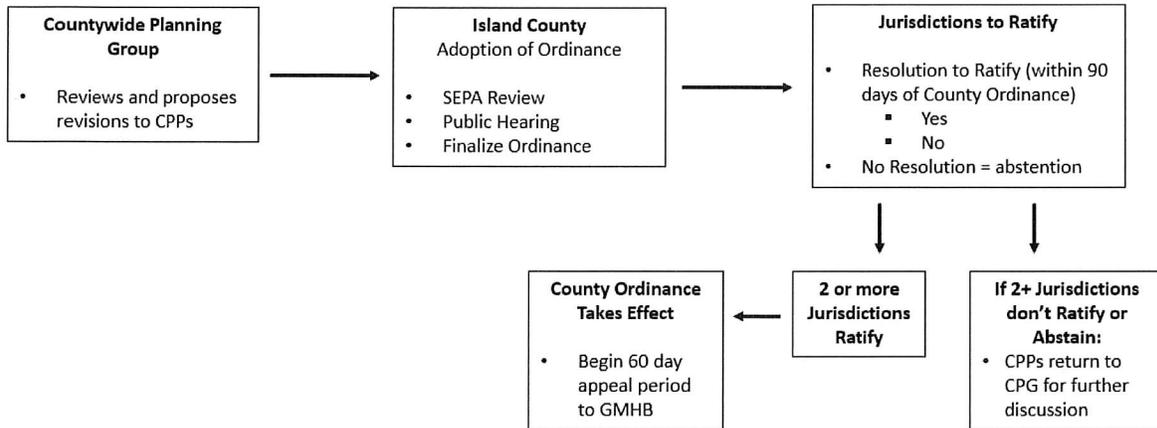
4.2 Procedures for Adopting or Amending Countywide Planning Policies

1. The CPPs shall be reviewed, updated, or amended as needed during the periodic update and review cycle required by RCW 36.70A.130, provided that any amendments or updates are consistent with the requirements of the GMA.
2. Amendments to the CPPs may be made outside of the normal periodic update cycle if necessary to address unforeseen or unanticipated events which must be addressed prior to the next periodic update cycle. In such instances, revisions may be proposed by a municipality or the county and should be drafted jointly by the CPG prior to being advanced to the legislative bodies representing Coupeville, Island County, Langley, and Oak Harbor.
3. At least two years before the periodic review deadline established by RCW 36.70A.130 the CPG shall begin a series of meetings to discuss planning issues of countywide importance that may affect the periodic updates of the municipalities or the county.
4. If necessary amendments or updates are identified during the CPG meetings they shall be forwarded to the BOCC for consideration. If the BOCC makes a decision to adopt the proposed revisions, they shall only become effective when ratified by the majority of legislative bodies representing Coupeville, Island County, Langley, and Oak Harbor.

Refer to the Ratification process below for more details:

Countywide Planning Policies, Revisions [\(November 2025\)](#)
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Island County Countywide Planning Policies Ratification Process



4.3 Population Projections and Land Capacity Analysis

1. As part of the periodic review process required by RCW 36.70A.130, the CPG shall review, and if necessary, revise the 20 year population projection. The county should lead this effort in cooperation with the municipalities.
2. In reviewing the 20 year population projection, the CPG shall utilize the medium series projection range issued by OFM as a base, or starting point. The CPG shall then analyze the assumptions used in the development of OFM's forecasting model. In those instances where OFM's assumptions differ from locally observed conditions or trends, adjustments may be made to the medium series projection.
 - a. When a mid-cycle evaluation is requested, or if the CPG deviates from the OFM medium projection, in addition to other relevant data, the following will be re-evaluated to ensure that county population projections and/or allocations are still valid and correct.
 - i. Migration factors (including commuter patterns, retirees, and county job growth);
 - ii. Building permits for new construction compared to projected population growth;
 - iii. Growth locations and densities (permit data); and
 - iv. Project impacts, if expansion evaluation is pursuant to 3.3.3 (c) or (d).
3. Once a general consensus has been reached by the members of the CPG, the CPG's population projection recommendation shall be forwarded to the Island County Planning Commission and the BOCC for consideration. Based on the Planning Commission's recommendation, the BOCC shall either adopt the 20 year population projection developed by the CPG or refer the matter back to the CPG for further work.

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4. BOCC adoption of a population projection shall include a resolution identifying the population projection to be used. The population projection decision shall only become final when ratified by the majority of legislative bodies representing Coupeville, Island County, Langley, and Oak Harbor.
5. After the population projection has been ratified, the CPG shall develop a plan for allocating the projected population growth to each jurisdiction. This regional allocation process should meet the requirements of RCW 36.70A.020 and be based on jobs, infrastructure, services, past growth trends, demographic characteristics, economic conditions, and housing market data. See Appendix B for more details on regional allocations.
6. For each UGA, a land capacity analysis shall be performed to determine if the UGA has sufficient capacity, with reasonable market factors in accordance with procedures provided in Appendix A, to accommodate the projected growth in population and jobs. The land capacity analysis should be conducted by the jurisdiction responsible for the UGA ([municipalities for incorporated UGAs and the County for unincorporated UGAs](#)) and shall utilize the procedures described in Appendix A.
7. If, based on the results of the land capacity analysis described above, it is determined that a UGA does not have sufficient capacity to accommodate 20 years of population and job growth, the UGA may be expanded as necessary to accommodate the anticipated growth, provided that any proposed expansion shall be consistent with the applicable criteria contained in section 3.3 of these policies.
8. If, based on the results of the land capacity analysis described above, it is determined that a UGA has significantly more capacity than is required to accommodate 20 years of population and job growth, the UGA may be reduced in size if requested by the jurisdiction responsible for the UGA, or if otherwise required to comply necessary to comply with the GMA, provided that any proposed reduction shall be consistent with the applicable criteria enumerated in section 3.3.
9. [If a municipality's Capital Facilities Plan shows that it is highly unlikely to meet the service levels required to support the housing allocations within the planning period in it's respective UGA, reassessment may be considered following WAC 365-496-415\(2\)\(d\)\(iii\).](#)

4.4 Monitoring and Reporting Procedures

1. In order to facilitate future analysis, the county and municipalities will maintain development records which include:
 - a. The number of housing units permitted and constructed annually. This information shall be collected and maintained in a manner which makes it possible to differentiate between new "additional" units and replacement units.

- b. The number of land divisions approved, the size of the parcel divided, the number of new or additional lots created through each division, the gross and net density achieved by each division, and the quantity of land used for public purposes within each division.
 - c. The number of multi-family development projects approved, the number of units contained within each development, the gross and net density achieved by each development, and the maximum density permitted in the zone where each project is located.
 - d. The square footage of new commercial or industrial buildings permitted and constructed. This information should be collected and maintained so that it is possible to calculate the floor area or site coverage ratios of each development.
2. The data described above should be provided to Island County Planning Department by the end of January each year for the purpose of maintaining an accurate buildable lands inventory. Following the receipt of this information the county may produce an annual report summarizing development trends in Island County and distribute this report to the municipalities and special service districts as appropriate.
 3. GIS data should be provided to Island County by the end of January each year to reflect any changes made to municipal land use or zoning maps. Additionally, Island County should provide updated parcel information to the municipalities.

5. Fiscal Impact Statement

It is the opinion of the county and municipalities that the CPPs, in themselves, have no fiscal impact and are an agreed upon method of guiding the planning activities required by the GMA. As the GMA and these policies are implemented to their maximum extent, county government may lose some tax base needed to operate essential services which serve both the county and municipalities. To compensate for this, legislation may be required to provide tax base sharing. Neither the fiscal impacts of implementing the GMA itself, nor the development of land use plans and development regulations necessary to implement the GMA, are addressed herein.

Countywide Planning Policies

Appendix A: Buildable Lands Procedures

1. DEFINITIONS

1. **Critical Areas:** Mapped and verified streams, wetlands, lakes, ponds, frequently flooded areas, steep slopes, and geologically hazardous areas, and their maximum associated buffers.
2. **Critical Area Constraint Factor:** A number representing the percentage of land (specific to each area analyzed) which is presumed to be constrained by critical areas, and therefore less likely to be available for development.
3. **Development Potential, Non-Residential & Multi-Family Residential:** The number of acres available for non-residential and multi-family residential development in each industrial, commercial, mixed use, and multi-family zone. In this analysis, development potential is used as a subtotal to express the gross capacity of vacant or re-developable parcels before the total development potential is calculated.
4. **Development Potential, Single-Family Residential:** The potential number of lots or dwelling units which can be created by dividing or developing vacant or partially vacant parcels in zones which permit single-family residential development. In this analysis, development potential is used as a subtotal to express the gross capacity of vacant or partially vacant parcels before the total development potential is calculated.
5. **Low Probability for Development:** Parcels which are not likely to be available for development because they are owned by a charitable organization, institution, or governmental entity. Low probability development parcels shall be identified based on Assessor's parcel data. Parcels which are tax exempt based on Assessor's parcel data shall be considered low probability development parcels. Parcels with an easement that restricts future development shall also be considered low probability development parcels.
6. **Partially Vacant Parcel:** A partially vacant parcel is a parcel which contains an existing dwelling unit but which is large enough to be divided.
7. **Public Purpose Land:** Includes land required for such things as streets, drainage facilities, and parks/open space.
8. **Re-Developable Parcel:** A parcel zoned for non-residential uses or multi-family residential uses that has the potential to be redeveloped and used more intensively.
9. **Total Development Potential, Non-Residential & Multi-Family Residential:** The total gross quantity of land available for multi-family or non-residential development before land is subtracted to account for public purposes and critical areas.

10. **Total Development Potential, Single-Family Residential:** The total gross number of lots or dwelling units which could be created by dividing and/or developing all vacant and partially vacant parcels available for single-family development before land is subtracted to account for public purposes and critical areas.
11. **Total Net Capacity:** The total net capacity of each single-family, multi-family, industrial, commercial, and mixed use zone after land is subtracted for public purposes and critical areas. Total net capacity is expressed in acres for multi-family and non-residential zones, and dwelling units or lots for single-family zones.
12. **Vacant Parcel:** A parcel which is either vacant or has an improved value of less than \$4,000 based on Assessor's parcel data. Parcels which contain a mobile or manufacture home shall not be considered vacant even if they have an improved value of less than \$4,000.
13. When the term **value** is used in this document it shall mean the assessed value identified in the Island County Assessor's database.
14. When the term **BOCC** is used in this document it shall mean the Board of Island County Commissioners.

2. ASSUMPTIONS:

1. **Affordable Housing:** Within all areas, identify buildable lands to accommodate all income levels as defined by the State. The State defines the income brackets as percentages of the area median income, separated as follows: 0-30% non-permanent supportive housing, 0-30% permanent supportive housing, 30-50%, 50-80%, 80-100%, 100-120%, greater than 120%, and emergency housing.
2. **Employment Density:** For commercial and industrial lands the following assumptions should be used:
 - a. Commercial, UGA: 17 employees per acre
 - b. Industrial: 8 employees per acre
3. **Public Land:** In RAIDs and UGAs, 15% of available land will be needed for public purposes.
4. **Re-Development Factor:** It is assumed that 50% of multi-family, commercial, and industrial parcels with an improvement to land value of less than 1:2 will be available for redevelopment during the planning period (20 years from the date of the most recent periodic update).
5. **Household Size (or Persons per Household):** An average household size will be used for each area analyzed based on census data.
6. **Partially Vacant Parcels:** Due to the smaller minimum lot sizes typically allowed within urban growth boundaries, it is not always practical to assume a parcel that is twice the minimum lot size will be able to subdivide due to the orientation of an

existing structure on the property. To account for this, a defined percentage of parcels between 2 and 4 times the minimum lot size in the zone should be deducted based on a sliding scale. Parcels located in rural areas shall be considered partially vacant if they are at least twice the minimum lot size required by the zone in which they are located.

Criteria	Adjustment Factor
2-2.5 times the minimum lot size	90%
2.6-3 times the minimum lot size	75%
3.1-4 times the minimum lot size	25%
> 4 times the minimum lot size	0%

7. **Rural Capacity Deficiencies:** If there is a capacity deficiency identified in the rural area of any one of the planning areas, the allocated population or jobs which are represented by that deficiency will be allocated to the UGA(s) within that planning area. If more than one UGA exists within that planning area, the population or jobs will be allocated in accordance with the same percentage of allocation used in the regional allocation process.
8. **Seasonal/Recreational adjustment factor:** Some dwelling units will not be available for residential occupancy, as they are used for short term rentals (e.g. VRBOs), second homes, etc. A seasonal/recreational factor will be based on the most current census data, but may be refined using local data.
9. **Vacancy Rate adjustment factor:** A reasonable factor for vacant units will be based on the most current census data, but may be refined using local data.
10. **Vacant Parcels adjustment factor:** To account for vacant parcels that will not fully develop to the maximum density allowed over the next planning period, the capacity calculation for vacant parcels will be reduced by a 10% adjustment factor.

3. RURAL ANALYSIS STEPS:

1. Identify all parcels within a RAID or UGA and exclude these parcels from further analysis.
2. Determine the critical area constraint factor for rural areas by combining all critical area GIS layers, calculating the number of acres constrained by critical areas within rural areas. The result is a critical area constraint factor for the rural area.
3. Separate parcels by zoning category and identify lands zoned park/open space, special review district, airport, or any other designation which does not allow for residential development. These parcels should be excluded from further analysis.

4. For each zoning designation, identify all low probability for development based on tax classification. Parcels which are publicly owned or tax exempt (parks, schools, churches, etc.) should be considered low probability development and excluded from further analysis.
5. For each zoning designation, calculate the development potential of all vacant parcels. The development potential of vacant parcels is determined by dividing the parcel area required by the minimum lot size allowed in the zone, and rounding down, and applying the vacant parcels adjustment factor. For example, a 17 acre parcel in the rural zone could be divided into three five acre parcels ($17/5 = 3.4$) and accommodate three dwelling units.
6. For each zoning designation calculate the development potential of all partially vacant parcels by dividing the parcel area by the minimum lot size, rounding down and subtracting one to account for the existing dwelling unit. For example, a 17 acre parcel in the rural zone with an existing home on it could be divided into three five acre parcels and two *additional* homes could be constructed on the resulting parcels. [$(17/5 = 3.4) - 1 = 2.4$]. Additionally, identify all the parcels that fall within are 2 to 3.5 times the minimum lot size or greater; discount a portion of these based on the sliding scale below provided in Section 2.5.
7. For each zoning designation determine the total development potential by adding the results from steps four and five together. This step allows the total build-out capacity for each, non-RAID, rural zoning designation to be determined (in dwelling units).
8. As a final step, add the resulting total development potential figures for each zoning designation together to determine the total development potential for areas outside of RAIDs and UGAs. Apply the critical area constraint factor and the seasonal/recreational adjustment factor to determine an appropriate amount of land to deduct from the development potential. This step will allow the total net capacity of the rural area (excluding RAIDs) to be determined (in number of dwelling units).
9. In order to determine the number of people that can be accommodated, the dwelling unit totals from steps six or seven can be multiplied by the average household size, with the vacancy rate adjustment factor applied. The average household size should be determined using the most recent census data available.

4. RAID ANALYSIS STEPS:

4.1 General Steps

1. Identify all parcels which are either located within a UGA or outside of a RAID. Exclude these parcels from further analysis.
2. For each zoning designation, identify all low probability for development based on tax classification. Parcels which are publicly owned or tax exempt (parks,

schools, churches etc.) should be considered low probability for development and excluded from further analysis.

3. Separate residential RAIDs from non-residential RAIDs by zoning designation. Residential RAID parcels should be analyzed separately from non-residential RAID parcels as described below.
4. Determine the critical area constraint factor for each RAID by combining all critical area GIS layers, calculating the number of acres constrained by critical areas within each RAID. The result is a critical area constraint factor for each RAID.

4.2 Determining the Capacity of Single Family Residential RAID Zones

1. For each residential RAID zoning designation calculate the development potential of all vacant parcels. The development potential of vacant parcels is determined by dividing the parcel area by the minimum lot size allowed in the zone, and rounding down, and applying the vacant parcels adjustment factor.
2. For each residential RAID zoning designation calculate the development potential of all partially vacant parcels. For purposes of this analysis, a partially vacant parcel is a parcel that is at least two times as large as the minimum lot size allowed by the zone. Calculate the development potential of all partially vacant parcels by dividing the parcel area by the minimum lot size allowed in the zone and rounding down and subtracting one in order to account for the existing dwelling unit. Additionally, identify all the parcels that fall within are 2 to 3.5 times the minimum lot size or greater; discount a portion of these based on the sliding scale below provided in Section 2.5.
3. For each residential RAID zoning designation determine the total development potential by adding the results of steps one and two together. Next determine the amount of land needed for public purposes and deduct an appropriate amount of land. Finally, apply the critical area constraint factor and the seasonal/recreational adjustment factor to determine an appropriate amount of land to deduct from the development potential. This step allows the total net capacity for each residential RAID zoning designation to be determined (in dwelling units).
4. Add the resulting total net capacity figures for each residential RAID zoning designation together to determine the total development potential for all residential RAID zones. This step will allow the total combined net capacity of residential RAID zones to be determined (in number of dwelling units).
5. In order to determine the number of people which can be accommodated, the dwelling unit totals from steps three or four can be multiplied by the average household size, with the vacancy rate adjustment factor applied. The average household size should be determined using the most recent census data available.

4.3 Determining the Capacity of Multi-Family & Mixed-Use Residential RAID Zones

See Section 5.3, UGA Multi-Family and Mixed-Use Residential instructions.

4.4 Determining Capacity of Non-Residential RAID Zones

1. For each non-residential RAID zoning designation identify all vacant parcels. Once all of the vacant parcels have been identified, calculate the total combined acreage of these parcels. The resulting number is the non-residential development potential of all vacant parcels (in acres) for each non-residential RAID zoning designation.
2. For each non-residential RAID zoning designation identify all re-developable parcels. A parcel should be considered re-developable if the parcel data indicates that the improvement value to land value ratio is less than 1:2. Once all of the re-developable parcels have been identified, calculate the total combined acreage of these parcels. The resulting number is the non-residential development potential of all re-developable parcels (in acres) for each non-residential RAID zoning designation. As a final step, deduct 50% in order to account for the re-development factor.
3. For each non-residential RAID zoning designation determine the total development potential by adding the results of steps one and two together. Next determine the amount of land needed for public purposes and deduct an appropriate amount of land. Finally apply the critical area constraint factor and deduct an appropriate amount of land. This step allows the total net capacity for each non-residential RAID zoning designation to be determined (in acres).
4. Add the resulting total net capacity figures for each non-residential RAID zoning designation together to determine the total development potential for all non-residential RAID zones. This step will allow the total combined build-out capacity of non-residential RAID zones to be determined (in acres).
5. In order to determine the number of jobs which can be accommodated in non-residential RAID zones, the acreage totals from step four can be multiplied by the average industrial and commercial employment densities.

5. UGA ANALYSIS STEPS:

5.1 General Steps

1. Sort parcels by zoning or comprehensive plan designation using Assessor's parcel data and/or any other applicable information.
2. For each UGA, identify all the low probability for development parcels in each zoning designation. Low probability for development parcels should include land which is tax exempt (parks, schools, churches, and public facilities). Parcels, located in developed tracts, used for stormwater drainage and landscaping should be identified and removed from the analysis. These parcels typically are a requirement of the site plan and are not available for redevelopment. Remove all

condominiums and gas stations from the results. Condominiums may show up in the results due to the relatively low improvement to land value of any one unit, however, the aggregate improvement to land value generally makes condominiums unlikely to redevelopment. Gas stations often have a low improvement to property value because they generally have very limited facilities and expensive real estate; however, they are highly unlikely to redevelop. These parcels should be excluded from further analysis.

3. For each UGA, compile all available critical area mapping information and merge these layers into a single layer to determine the total quantity of constrained acreage in each zoning designation. Calculate the percentage of land area within each UGA that is constrained by critical areas by comparing number of acres constrained by critical areas to the total number of acres in each UGA. This calculation will result in a critical area constraint factor for each UGA.
4. Based on available zoning or comprehensive plan information, sort all parcels into the following groups: (a) parcels zoned for single family home development (freestanding homes, townhomes, or other forms of individual lot development); (b) parcels zoned for multi-family or mixed-use residential development (apartments, condominiums, mobile home parks, and other forms of multi-unit per parcel development); (c) commercial and mixed-use commercial zones; and (d) industrial zones. For each of the following groups, describe how housing at each income level will be accommodated (i.e., moderate-, low-, very low-, and extremely low-income households). Each of these groups should then be analyzed separately as described below.

5.2 UGA Capacity - Single Family Zones

1. For each single-family zoning designation calculate the development potential of all vacant parcels. The development potential of vacant parcels is determined by dividing the parcel area by the minimum lot size allowed in the zone, rounding down, and applying the vacant parcels adjustment factor. When planning policies or development regulations specify both a minimum and maximum density, both should be calculated to produce a range. Developments since the adoption of the most recent development regulations should be used to select the most likely density for expected development to achieve within this potential range.
2. For each single-family zoning designation calculate the development potential of all partially vacant parcels. For purposes of this analysis, a partially vacant parcel is a parcel that is at least two times as large as the minimum lot size allowed by the zone. Calculate the development potential of all partially vacant parcels by dividing the parcel area by the minimum lot size allowed in the zone and rounding down and subtracting one in order to account for the existing dwelling unit. When planning policies or development regulations specify both a minimum and maximum density, both should be calculated to produce a range. Additionally, identify all the parcels that fall are 2 times the minimum lot size or greater; discount a portion of these based on the sliding scale provided in Section 2.5.

3. For each single-family zoning designation determine the total development potential by adding the results of steps one and two together. Next, determine the amount of land needed for public purposes and deduct this percentage from the total development potential. Finally, apply the critical area constraint factor for the UGA and the seasonal/recreational adjustment factor to determine an appropriate amount of land to deduct from the development potential. This step allows the total net capacity for each single-family zoning designation in the UGA to be determined (in dwelling units).
4. Add the resulting total net capacity figures for each residential single-family zoning designation in the UGA together to determine the total development potential for all single-family zones in the UGA. The result of this step will be the total combined capacity of all single-family zones in the UGA (in number dwelling units).
5. In order to determine the number of people that can be accommodated in the UGA's, single-family zones the dwelling unit totals from steps three or four can be multiplied by the average household size, with the vacancy rate adjustment factor applied. The average household size should be determined using the most recent census data available.

5.3 UGA Capacity – Multi-Family and Mixed-Use Residential Zones*

*Also used for RAID Capacity – Multi-Family and Mixed-Use Zones

1. Identify all vacant parcels zoned for multi-family and mixed-use residential development. Determine the development potential of these parcels by multiplying the acreage of the parcels by the density permitted in the zone and applying the vacant parcels adjustment factor. For zones with both a minimum and a maximum density, calculate the development potential at both the minimum allowed density and the maximum permitted density. Developments since the adoption of the most recent development regulations should be used to select the most likely density for expected development to achieve within this potential range.
2. For all areas designated for multi-family and mixed-use residential identify the parcels which can be redeveloped. In order to be re-developable, a parcel should have an improvement to land value ratio of less than 1:2. Determine the development potential of these parcels by multiplying the acreage of the parcels by the density permitted in the zone. As a final step, deduct 50% in order to account for the redevelopment factor. For zones with both a minimum and a maximum density calculate the development potential at both the minimum allowed density and the maximum permitted density.
3. For each multi-family and mixed-use residential zoning designation determine the total development potential by adding the results of steps one and two together. Next determine the amount of land needed for public purposes and deduct an appropriate amount of land. Finally, apply the critical area constraint factor for the UGA and the seasonal/recreational adjustment factor to determine an

appropriate amount of land to deduct from the development potential. This step allows the total net capacity for each multi-family and mixed-use residential zoning designation in the UGA to be determined (in dwelling units).

4. Add the resulting total net capacity figures for each multi-family and mixed-use residential zoning designation in the UGA together to determine the total development potential for all multi-family and mixed-use residential zones in the UGA. The result of this step will be the total combined capacity of all multi-family and mixed-use residential zones in the UGA (in dwelling units).
5. In order to determine the number of people that can be accommodated in the UGA's multi-family and mixed-use residential zones, the dwelling unit totals from steps three or four can be multiplied by the average household size, with the vacancy rate adjustment factor applied. The average household size should be determined using the most recent census data available.

5.4 UGA Capacity – Commercial & Mixed-Use Commercial Zones

1. For each commercial or mixed-use commercial UGA zoning designation identify all vacant parcels. Once all of the vacant parcels have been identified, calculate the total combined acreage of these parcels. The resulting number is the commercial and mixed-use commercial development potential of all vacant parcels (in acres) for each non-residential commercial and mixed use zoning designation.
2. For each commercial or mixed-use commercial UGA designation identify all re-developable parcels. A parcel should be considered re-developable if the parcel data indicates that the improvement value to land value ratio is less than 1:2. Once all of the re-developable parcels have been identified, calculate the total combined acreage of these parcels. As a final step, deduct 50% in order to account for the redevelopment factor. The result is the development potential of all re-developable parcels (in acres) for each commercial or mixed-use commercial UGA zoning designation.
3. For each commercial or mixed-use commercial UGA zoning designation determine the total development potential by adding the results of steps one and two together. Next determine the amount of land needed for public purposes and deduct an appropriate amount of land. Finally apply the critical area constraint factor and deduct an appropriate amount of land. This step allows the total net capacity for each commercial or mixed-use commercial UGA zoning designation to be determined (in acres).
4. Add the resulting total net capacity figures for each commercial or mixed-use commercial UGA zoning designation together to determine the total development potential for all commercial or mixed use UGA zones. This step will allow the total combined build-out capacity of commercial or mixed-use commercial UGA zones to be determined (in acres).

5. In order to determine the number of jobs which can be accommodated in commercial or mixed-use commercial UGA, the acreage totals from steps three or four can be multiplied by the average commercial employment density.

5.5 UGA Capacity – Industrial Zones

1. For each industrial UGA zoning designation identify all vacant parcels. Once all of the vacant parcels have been identified, calculate the total combined acreage of these parcels. The resulting number is the development potential of all vacant parcels (in acres) for each industrial UGA zoning designation.
2. For each industrial UGA designation identify all re-developable parcels. A parcel should be considered re-developable if the parcel data indicates that the improvement value to land value ratio is less than 1:2. Once all of the re-developable parcels have been identified, calculate the total combined acreage of these parcels. As a final step, deduct 50% in order to account for the redevelopment factor. The result is the development potential of all re-developable parcels (in acres) for each industrial UGA zoning designation.
3. For each industrial UGA zoning designation determine the total development potential by adding the results of steps one and two together. Next determine the amount of land needed for public purposes and deduct an appropriate amount of land. Finally apply the critical area constraint factor and deduct an appropriate amount of land. This step allows the total net capacity for each industrial UGA zoning designation to be determined (in acres).
4. Add the resulting total net capacity figures for each industrial UGA zoning designation together to determine the total development potential for all industrial UGA zones. This step will allow the total combined build-out capacity of industrial UGA zones to be determined (in acres).
5. In order to determine the number of jobs which can be accommodated in commercial or mixed use UGA, the acreage totals from steps three or four can be multiplied by the average industrial employment density.

Countywide Planning Policies

Appendix B: Housing Allocation Methodology

Background

In 2021, House Bill 1220 amended the GMA and changed how housing is allocated during the comprehensive plan update process. The guidance shifted from encouraging affordable housing, to mandating that jurisdictions plan for and accommodate housing affordable to all income levels.

These changes prompted Island County's CPG to revisit how housing is allocated in the CPPs and develop a new process for allocating housing to jurisdictions that meets the requirements in RCW 36.70A.

Assumptions

The past housing methodology for Island County allocated growth to four sub areas and then further divided the growth in each of the subareas, largely according to past population growth trends.

In developing a new methodology, the following assumptions were utilized:

- Following the spirit of the GMA, growth should be prioritized in urban areas where jobs, infrastructure, and services exist to support diverse housing types.
- Each jurisdiction should accommodate an equitable allocation of new housing for each income level (i.e., moderate income, low income, very low income, extremely low income, permanent supportive housing, and emergency housing).
- Housing should no longer be divided by sub area first (i.e., north, central, and south Whidbey, and Camano) and instead shall be allocated directly by jurisdiction including Unincorporated Island County, Oak Harbor, Coupeville, and Langley.
- Unincorporated Island County's share of the population and housing allocations will subsequently be divided between the Freeland NMUGA, [UGAs outside of municipal boundaries](#), RAIDs, and other rural areas.
- No jurisdiction shall be unreasonably burdened by their housing allocation; therefore, no jurisdiction shall be assigned a housing allocation that increases their existing housing stock by more than 60 percent.
- Sewer extensions will be needed within all UGAs to support growth within a municipality. Similarly, septic or sewer improvements will be needed in many of the county's RAIDs and NMUGAs to support growth.

- Relevant data associated with NASWI should be considered in combination with data from the City of Oak Harbor, rather than unincorporated Island County, to accurately reflect patterns of residence, employment, and use of amenities.

Approach

The following steps were taken to arrive at percentage allocations for the jurisdictions:

- The OFM Medium population estimate was used as the basis for Island County's population growth and housing allocations.
- Census data on the quantity and location of jobs, specifically the Longitudinal Employer Household Dynamics (LEHD) dataset, was utilized to inform the baseline percentages for the countywide allocations.
 - LEHD 2019 data was used instead of the 2020 data due to impacts from the COVID-19 pandemic. More current data within this data set was not available as of November 2023.
- The following additional weights were created and applied to the baseline jobs percentages:
 - The LEHD 2019 Origin-Destination Employment Statistics (LODES) data was used in combination with data from the 2019 NASWI Military Personnel Housing Survey to determine the number of jobs in a jurisdiction. A flow ratio was then assigned to reflect the number of employed persons residing in the same jurisdiction.
 - Transportation accessibility was assessed using Washington State Department of Transportation (WSDOT) transit data paired with Island County parcel data. Transit routes were buffered 0.5 mile to generate a percentage of parcels that are reasonably serviced by transit. A buffer from routes instead of stops was used due to the offering of flag stops by Island Transit.
 - North America Industry Classification System (NAICS) employment data, specifically the LEHD 2019 Work Area Profile, "educational services" (NAICS 61), and "health care and social assistance" (NAICS 62) categories were selected and combined to represent social service locations in jurisdictions.
- The CPG agreed on the following weights to apply to the allocation methodology: 75% to Jobs, 10% to Transportation, 10% to Social Services, and 5% to Flow Ratio.
- A cap was applied to jurisdictions to avoid unreasonably burdening any jurisdiction with planning for extreme increases in housing and population during a single planning period (as referenced in the assumptions).
 - Coupeville's Cap: Using a recently completed Land Capacity Analysis (2022), the total housing allocation for Coupeville was reduced to reflect its location within Ebey's Landing National Historical Reserve as well as RCW 36.70.A.110(2), which states that "*In the case of urban growth areas*

contained totally within a national historical reserve, the city [town] may restrict densities, intensities, and forms of urban growth as determined to be necessary and appropriate to protect the physical, cultural, or historic integrity of the reserve.” The reserve presents unique constraints to new residential development for Coupeville, as it limits potential growth internally due the presence of historic resources, and externally, due to a mixture of critical areas and conservation easements. As a result, Coupeville is not well-positioned to accommodate significant growth beyond its recently completed Land Capacity Analysis and relies on a cap to maintain its unique built environment and surrounding natural resources.

- Langley’s Cap: The total growth allocated to Langley after the weighting was applied would have exceeded 60 percent of the 2020 existing housing; therefore, Langley’s allocation was capped to limit growth to 60 percent over the 20-year planning period.
- Final percentages for each jurisdiction were inputted into the Washington State Department of Commerce’s Housing for All Planning Tool (HAPT), utilizing Method A, to generate housing and affordability allocations for each jurisdiction. The CPG reviewed both methods (Method A and B) provided by Commerce and determined Method A was a better fit for our growth patterns and unique circumstances.
- [The City of Oak Harbor was originally allocated 5,533 dwelling units for both their city limits and UGA. After conducting a capacity analysis, the City proposed accommodating 3,735 units in the city limits and the remaining 1,797 units in a UGA expansion.](#)
- [In July 2025, the County considered Oak Harbor’s recommendation for a UGA expansion and determined that the proposed expanded UGA could not reasonably be served by the City within the 20-year planning period without an annexation and adequate Capital Facilities Plan. The County and the City are developing an Interlocal Agreement to address long-term plans for the UGA.](#)
- [In October 2025, the County and City agreed to pursue an Interlocal Agreement to annex 77.86 acres in the UGA as part of their comprehensive plan updates. The lands identified for annexation represent a probable capacity of 257 units based on city zoning. Those units were added to the City’s capacity \(3,735\) for a revised total of 3,992 dwelling units to represent the city limits.](#)
- [The County determined the remaining housing allocations proposed for the Oak Harbor UGA could not be reasonably accommodated due to a lack of infrastructure. Therefore, the County followed WAC 365-196-415\(2\)\(d\)\(iii\)\(G\) to reduce the housing allocations by 1,541 dwelling units.](#)
- [These changes reduced the total population projection for the county from 102,639 to 99,202, a reduction of 3,437 people, which falls within the medium and low population projection ranges issued by OFM.](#)

Included below are figures that represent the data and tools used to produce the allocations.

Figure 1 – Final Weights and Distributions (Original Allocations)

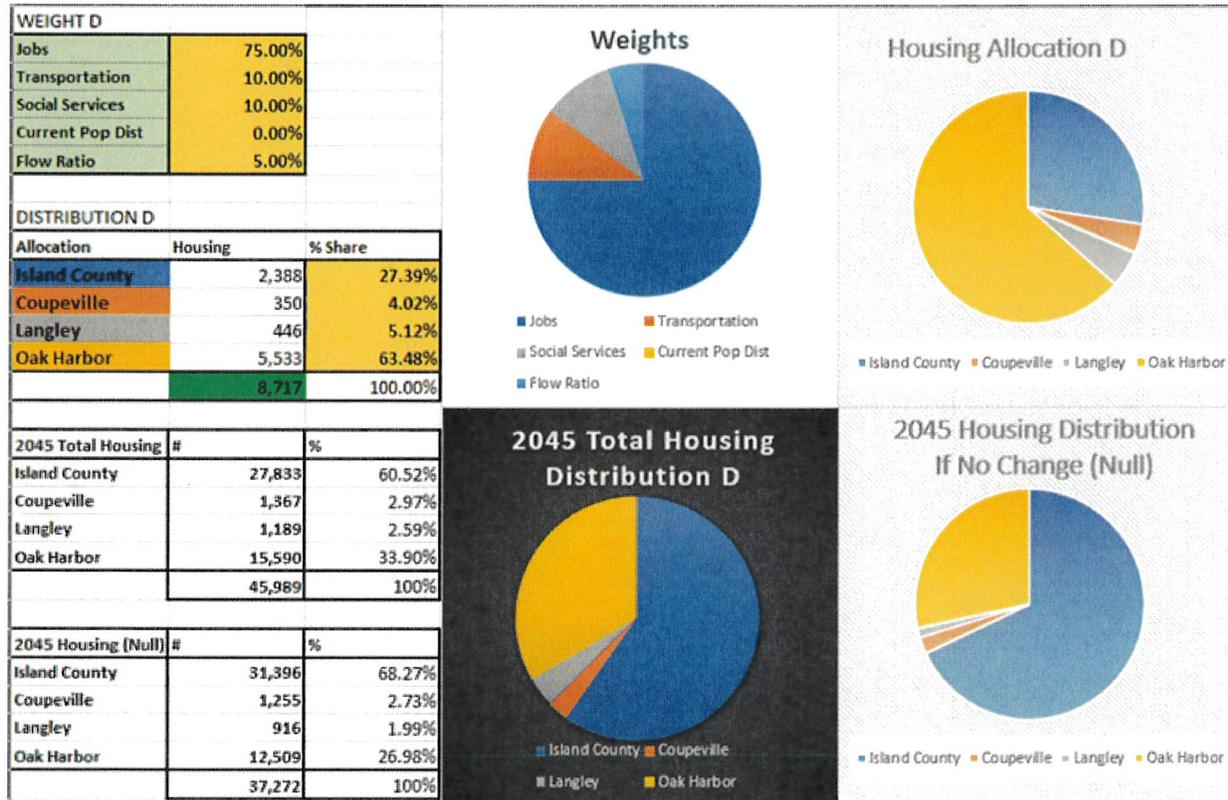


Figure 2 – Data Sets Used [\(Original Allocations\)](#)

Baseline job allocations	Share	Count		Transportation	Parcels Serviced	Total parcels	Share
Unincorporated Island County	24.28%	6,715		Unincorporated Island County	25,867	43,323	59.71%
- <i>Freeland</i>	4.77%	1,237		Coupeville	1,054	1,271	82.93%
- <i>Clinton</i>	0.88%	229		Oak Harbor	8,332	8,381	99.42%
Coupeville town	7.93%	2,057		Langley	876	913	95.95%
Langley city	2.27%	588					
Oak Harbor city	21.18%	5,497					
Oak Harbor + NAS Whidbey (estimated)	65.52%	16,597		Social Services	Jobs Count	Share	
- <i>NAS Whidbey</i>	42.76%	11,100		Unincorporated Island County	925	22.87%	
- <i>NAS Whidbey military personnel</i>	Added to Oak Harbor	9,000		Coupeville	1050	25.96%	
- <i>NAS Whidbey civilian contractors</i>	Added to Oak Harbor	2,100		Langley	81	2.00%	
Total	100%	25,957		Oak Harbor	1988	49.16%	

Flow Ratios	Outflow%	Inflow%	Retained%	Employed	Residing	Emp/res
Oak Harbor	36.62%	37.82%	63.38%	16,597	16,927	98.05%
Langley	92.65%	94.90%	7.35%	588	408	144.12%
Coupeville	91.23%	95.10%	8.77%	2,057	1,140	180.44%
Uninc. Island County	84.07%	44.84%	15.93%	6,305	21,837	28.50%
- <i>Freeland</i>	87.10%	90.70%	12.90%	1,237	894	138.37%
- <i>Clinton</i>	96.40%	93.90%	3.60%	229	385	59.48%
- <i>Camano Island</i>	92.50%	51.20%	7.50%	1,163	7,577	15.35%
Inter-Island County Total	52.28%	26.78%	47.42%	25,547	40,312	63.37%

Figure 3 – Work Area Profile (Original Allocations)

Work Area Profile Report - 2019	Island County		Oak Harbor		Langley		Coupeville		Unincorporated Island County
	Count	Share	Count	Share	Cou	Share	Cou	Share	
Total All Jobs									
Total All Jobs	14,857	100.0%	5,497	100.0%	588	100.0%	2,057	100.0%	6,715
Jobs by NAICS Industry Sector									
Agriculture, Forestry, Fishing and Hunting	171	1.2%	0	0.0%	0	0.0%	7	0.3%	164
Mining, Quarrying, and Oil and Gas Extraction	13	0.1%	0	0.0%	0	0.0%	0	0.0%	13
Utilities	57	0.4%	5	0.1%	0	0.0%	15	0.7%	37
Construction	1,197	8.1%	226	4.1%	3	0.5%	28	1.4%	940
Manufacturing	797	5.4%	149	2.7%	1	0.2%	8	0.4%	639
Wholesale Trade	192	1.3%	32	0.6%	5	0.9%	13	0.6%	142
Retail Trade	1,978	13.3%	884	16.1%	68	11.6%	70	3.4%	956
Transportation and Warehousing	448	3.0%	129	2.3%	0	0.0%	0	0.0%	319
Information	162	1.1%	17	0.3%	7	1.2%	3	0.1%	135
Finance and Insurance	320	2.2%	161	2.9%	16	2.7%	32	1.6%	111
Real Estate and Rental and Leasing	333	2.2%	177	3.2%	6	1.0%	23	1.1%	127
Professional, Scientific, and Technical Services	696	4.7%	180	3.3%	32	5.4%	38	1.8%	446
Management of Companies and Enterprises	75	0.5%	62	1.1%	0	0.0%	0	0.0%	13
Administration & Support, Waste Management and Remediat	498	3.4%	121	2.2%	6	1.0%	12	0.6%	359
Educational Services	1,772	11.9%	1,167	21.2%	22	3.7%	152	7.4%	431
Health Care and Social Assistance	2,272	15.3%	821	14.9%	59	10.0%	898	43.7%	494
Arts, Entertainment, and Recreation	432	2.9%	127	2.3%	28	4.8%	9	0.4%	268
Accommodation and Food Services	1,947	13.1%	893	16.2%	269	49.1%	172	8.4%	593
Other Services (excluding Public Administration)	650	4.4%	194	3.5%	24	4.1%	33	1.6%	399
Public Administration	847	5.7%	152	2.8%	22	3.7%	544	26.4%	129
Health Care and Social Assistance	Count	Percent Share							
Unincorporated Island County	494	21.74%							
Coupeville	898	39.52%							
Langley	59	2.60%							
Oak Harbor	821	36.14%							
		100.00%							
Educational Services	Count	Percent Share							
Unincorporated Island County	431	24.32%							
Coupeville	152	8.58%							
Langley	22	1.24%							
Oak Harbor	1,167	65.86%							
		100.00%							
Combined Healthcare + Educational Services	Count	Percent Share							
Unincorporated Island County	925	22.87%							
Coupeville	1,050	25.96%							
Langley	81	2.00%							
Oak Harbor	1,988	49.16%							
		100.00%							

Figure 4 – Flow Ratio Table (Original Allocations)

ESTIMATES WITH EXTRAPOLATED NASWI DATA

Inter-county flows	Outflow (%)	Outflow (#)	Retained (%)	Retained (#)	Inflow (%)	Inflow (#)
Oak Harbor	23.67%	4,988	61.15%	11,939	34.06%	2,330
Coupeville	1.77%	374	3.92%	766	5.17%	354
Langley	1.10%	232	0.90%	176	1.17%	80
Uninc. Island County	73.46%	15,480	34.02%	6,643	59.60%	4,077
- <i>Freeland</i>	2.22%	468	2.18%	426	4.85%	332
- <i>Clinton</i>	1.12%	236	0.76%	149	0.99%	68
- <i>Camano Island</i>	32.70%	6,892	3.51%	685	1.43%	98
Island County Total	100%	21,074	100%	19,524	100%	6,841

Intra-county flows	Outflow (%)	Outflow (#)	Retained (%)	Retained (#)	Inflow (%)	Inflow (#)
Oak Harbor	13.98%	1,211	77.10%	11,098	56.45%	3,947
Coupeville	7.69%	666	0.70%	100	22.93%	1,603
Langley	1.64%	142	0.21%	30	6.84%	478
Uninc. Island County	77.52%	6,715	22.00%	3,167	13.79%	964*
- <i>Freeland</i>	--	311	--	115	--	790
- <i>Clinton</i>	--	135	--	14	--	147
- <i>Camano Island</i>	--	118	--	567	--	498
Island County Total	100%	8,662	100%	14,395	100%	6,992

Flow Ratios	Outflow%	Inflow%	Retained%	Employed	Residing	Emp/res
Oak Harbor	36.62%	37.82%	63.38%	16,597	16,927	98.05%
Langley	92.65%	94.9%	7.35%	588	408	144.12%
Coupeville	91.23%	95.1%	8.77%	2,057	1,140	180.44%
Uninc. Island County	84.07%	44.84%	15.93%	6,305	21,837	28.50%
- <i>Freeland</i>	87.1%	90.7%	12.9%	1,237	894	138.37%
- <i>Clinton</i>	96.4%	93.9%	3.6%	229	385	59.48%
- <i>Camano Island</i>	92.5%	51.2%	7.5%	1,163	7,577	15.35%
Inter-Island County Total	52.28%	26.78%	47.42%	25,547	40,312	63.37%

Extrapolated figures:

Residing on base: 1,458

Residing in Oak Harbor: 7,497

Residing in Coupeville: 472

Residing in Langley: 10

Residing outside of Island County: 2,071

Figure 5 – Transportation Map (Original Allocations)

Island County Transit Service 1/2 mile from Route



Figure 6 – HAPT Allocations (Original Allocations)

Island County		Projection Year: 2045 Population Target = 102,639		Permanent Housing Needs by Income Level (% of Area Median Income)							Emergency Housing Needs (Temporary)
				Total	0-30%		>30-50%	>50-80%	>80-100%	>100-120%	
		Countywide Estimated Housing Supply (2020)	37,272	1,210	18	2,915	7,479	5,878	4,734	15,038	116
		Countywide Additional Units Needed (2020-2045)	8,717	986	838	1,775	1,512	717	683	2,206	265
		Sum of Allocation to Jurisdictions (from User Inputs)	8,717	986	838	1,775	1,512	717	683	2,206	266
User Input - % Share of County Population Growth. Values must sum to 100%				100.00% Met Target	<-- Sum of user inputs for jurisdiction shares of county future net housing need. If below 100%, increase shares. If above 100%, decrease shares.						
		* The location of 10 existing permanent supportive housing units within Island County is unknown. Therefore, they are not included in the jurisdiction table below.		Permanent Housing Needs by Income Level (% of Area Median Income)							Emergency Housing Needs (Temporary)
		Total	0-30%		>30-50%	>50-80%	>80-100%	>100-120%	>120%		
			Non-PSH	PSH *							
27.39 %	Unincorporated Island County	Estimated Housing Supply (2020)	25,445	598	8	1,580	3,311	3,676	3,788	12,484	28
		Allocation Method A (2020-2045)	2,388	270	230	486	414	196	187	604	73
4.02 %	Coupeville town	Estimated Housing Supply (2020)	1,017	73	0	191	162	77	118	396	0
		Allocation Method A (2020-2045)	350	40	34	71	61	29	27	89	11
5.12 %	Langley city	Estimated Housing Supply (2020)	743	74	0	34	90	125	107	313	21
		Allocation Method A (2020-2045)	446	50	43	91	77	37	35	113	14
63.47 %	Oak Harbor city	Estimated Housing Supply (2020)	10,057	465	0	1,110	3,916	2,000	721	1,845	67
		Allocation Method A (2020-2045)	5,533	626	532	1,127	960	455	434	1,400	168

Figure 7 – HAPT Income Distributions (Original Allocations)

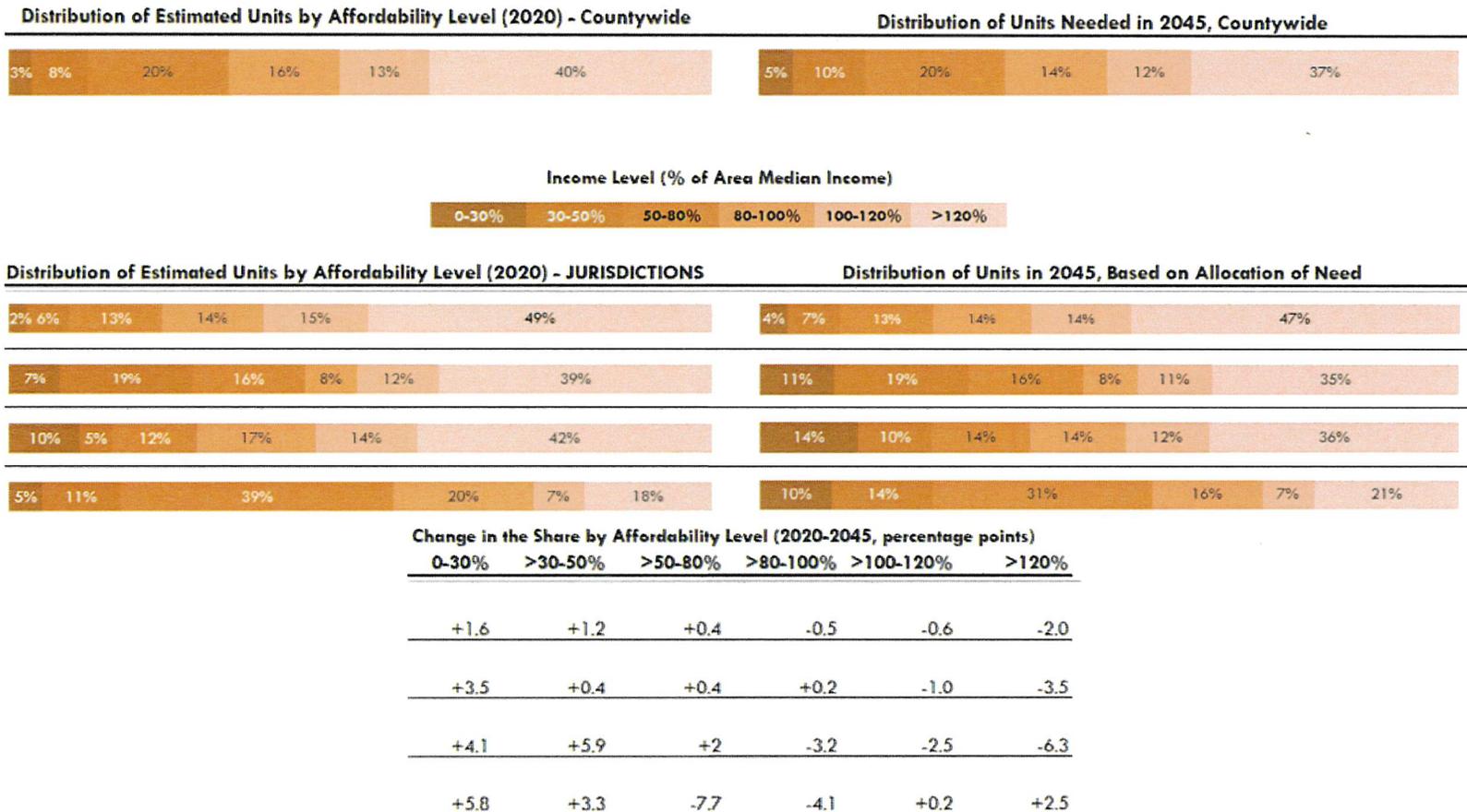


Figure 8 – HAPT Allocations (Following reassessment November 2025)

Island County		Projection Year: 2045 Population Target = 99,202		Permanent Housing Needs by Income Level (% of Area Median Income)							Emergency Housing Needs (Temporary)	
				Total	0-30%		>30-50%	>50-80%	>80-100%	>100-120%		>120%
					Non-PSH	PSH						
		Countywide Estimated Housing Supply (2020)	37,272	1,210	18	2,915	7,479	5,878	4,734	15,038	116	
		Countywide Additional Units Needed (2020-2045)	7,176	846	762	1,560	1,266	560	527	1,655	238	
		Sum of Allocation to Jurisdictions (from User Inputs)	7,176	846	762	1,560	1,266	560	527	1,655	238	
User Input - % Share of County Population Growth. Values must sum to 100%				100.00% Met Target	<-- Sum of user inputs for jurisdiction shares of county future net housing need. If below 100%, increase shares. If above 100%, decrease shares.							
				Permanent Housing Needs by Income Level (% of Area Median Income)							Emergency Housing Needs (Temporary)	
				Total	0-30%		>30-50%	>50-80%	>80-100%	>100-120%	>120%	
					Non-PSH	PSH #						
		* The location of 10 existing permanent supportive housing units within Island County is unknown. Therefore, they are not included in the jurisdiction table below.										
33.27 %	Unincorporated Island County	Estimated Housing Supply (2020)	25,445	598	8	1,580	3,311	3,676	3,788	12,484	28	
		Allocation Method A (2020-2045)	2,388	270	230	486	414	196	187	604	73	
4.88 %	Coupeville town	Estimated Housing Supply (2020)	1,017	73	0	191	162	77	118	396	0	
		Allocation Method A (2020-2045)	350	40	34	71	61	29	27	89	11	
6.22 %	Langley city	Estimated Housing Supply (2020)	743	74	0	34	90	125	107	313	21	
		Allocation Method A (2020-2045)	446	50	43	91	77	37	35	113	14	
55.63 %	Oak Harbor city	Estimated Housing Supply (2020)	10,057	465	0	1,110	3,916	2,000	721	1,845	67	
		Allocation Method A (2020-2045)	3,992	486	455	912	714	298	278	849	140	

**Note: Oak Harbor's allocations include 257 units that represent the capacity of a proposed annexation area that is planned to be completed through an Interlocal Agreement as a part of the City's and County's Comprehensive Plan updates. If the annexation does not proceed, the 257 units will be accommodated elsewhere in the city and county.*

EXHIBIT B

BEFORE THE PLANNING COMMISSION
OF ISLAND COUNTY, WASHINGTON

FINDINGS OF FACT IN THE MATTER OF
ADOPTING REVISED COUNTYWIDE
PLANNING POLICIES AFTER
REASSESSMENT FOR THE 2025
COMPREHENSIVE PLAN UPDATE

Summary

The Washington State Growth Management Act (GMA) requires that cities and counties adopt comprehensive plans. The GMA further requires that counties adopt Countywide Planning Policies (CPPs) (RCW 36.70A.210 & WAC 365-196-305) to guide and coordinate issues of regional significance. The CPPs are intended to guide intergovernmental planning efforts, fully implement the planning goals identified in the GMA, and ensure that the actions of government agencies are coordinated and consistent with one another.

Island County initially adopted CPPs in 1992. These CPPs were subsequently revised in 1998, 1999, 2015, and 2017. Island County, and the municipalities within Island County, are currently reviewing and updating their comprehensive plans, updated CPPs have been developed to address changes to state law, areas of concern from past updates, and to facilitate countywide comprehensive planning efforts.

The development of revised CPPs was a collaborative process. A Countywide Planning Group (CPG) comprised of representatives from the planning departments of Oak Harbor, Coupeville, Langley, and Island County, along with a representative from Naval Air Station Whidbey Island (NASWI), was formed to facilitate this effort. Following RCW 36.70A.110, local tribes were invited to participate in these planning efforts. Approximately 15 CPG meetings were held between May 2023 and December 2023 to discuss revisions to the CPPs, a uniform buildable lands analysis methodology, and the creation of a new housing methodology, following the Washington State Legislature's passing of House Bill 1220 in 2021. Among CPG members, a general consensus on the changes to the CPPs was reached in November 2023. The CPG members then agreed to forward the proposed revisions to their respective planning commissions and elected bodies for further review.

The Island County Planning Commission (hereafter, the Planning Commission) recommended approval of the CPPs to the Board of Island County Commissioners on February 2, 2024, following a public hearing. The Board adopted the CPPs on March 26, 2024 (Ordinance C-08-24) following a public hearing. After the Board's adoption, the CPPs were ratified by all three jurisdictions.

After the CPPs were adopted, jurisdictions worked independently on their land capacity analyses. Jurisdictions are required to coordinate with the County on any Urban Growth Area (UGA) changes. Oak Harbor and Island County began discussions on the UGA for Oak

Harbor in September of 2024. Oak Harbor formally proposed a UGA expansion in a letter to the County dated April 22, 2025.

The County holds the authority for granting UGA expansions under WAC 365-196-310(3)(d) and requested additional information from the City to justify the expansion, including a Capital Facilities Plan and Annexation Plan. The City declined to provide these planning documents. Planning for urban densities in a UGA requires urban infrastructure including sewer, water, sidewalks etc. per RCW 36.70A.070(3), WAC 365-196-310(3)(e and g). Most often these services are provided during annexation. Without a plan to provide essential urban infrastructure and services, and without a plan for annexation of the UGA, the City's expansion proposal was not viable. The County declined to move forward with the UGA expansion proposal in its comprehensive plan. Consequently, the County and City agreed to develop an Interlocal Agreement to address long term plans for the UGA and followed the reassessment process outlined under WAC 365-196-415(2)(d)(iii)(G) to reduce the population projection to account for the population that could not be accommodated in the existing unincorporated UGA. This change requires a revision to the population projection and the CPPs.

The Planning Commission has reviewed the revised CPPs produced by the CPG and makes the following findings and recommendations.

Findings

1. Island County conducts planning activities in accordance with Chapter 36.70 RCW, the Planning Enabling Act.
2. The planning activities of Island County, and the planning activities of municipalities within Island County, are further regulated by the provisions of RCW 36.70A, the Growth Management Act (GMA).
3. The GMA requires counties and cities to periodically update their comprehensive plans and development regulations (RCW 36.70A.130(5)). Island County last completed a periodic update in 2016; and Island County must complete an update by December 31, 2025.
4. The GMA requires that counties subject to GMA adopt CPPs, and further requires that these policies be developed with the cooperation of the municipalities within the county (RCW 36.70A.210(2)).
5. CPPs are written policy statements used to establish a countywide framework from which county and municipal comprehensive plans are developed and adopted to ensure consistency between plans, as required by RCW 36.70A.100 and RCW 36.70A.210(1).
6. In order to address the requirements of the GMA, Island County and the jurisdictions within Island County adopted CPPs in 1992, which were subsequently revised in 1998, 1999, 2015, and 2017.

7. In the seven years since the CPPs were last amended, the GMA has evolved through legislative amendments, judicial interpretations, and Growth Management Hearing Board decisions.
8. The GMA does not specifically address amendments to the CPPs; however, Island County's CPPs include population projections and allocations to jurisdictions from the previous planning period. Island County's CPPs should be updated with each periodic update to properly plan for current population and housing allocations, to address countywide planning concerns, and to comply with current legal requirements.
9. The CPPs state that the document may be amended through approval by the Island County Board of County Commissioners, and ratified once the CPPs are adopted by a majority of the cities and towns within Island County.
10. To develop the revised CPPs, the CPG comprised of representatives from the planning departments of Oak Harbor, Coupeville, Langleys, and Island County, along with a representative from NASWI, was formed. In accordance with RCW 36.70A.110, local tribes were invited to participate in these planning efforts; and the Swinomish Tribe participated in two meetings.
11. The CPG held approximately 15 meetings between May 2023 and January 2024 to discuss revisions to the CPPs, a uniform buildable lands analysis methodology, and the creation of a new housing methodology following the 2021 State Legislature's passing of House Bill 1220.
12. A draft CPP document was prepared and distributed to CPG members; changes were discussed at CPG meetings and CPG members were given ample opportunity to edit and comment on the document.
13. Among CPG members, a general consensus on the proposed changes to the CPPs was reached in November 2023.
14. On November 15, 2023, the Planning Commission held a public hearing on the proposed 2045 population projection of 102,639; this population projection reflects an increase of 15,782 people or 8,717 dwelling units. The majority of the Planning Commission believed that the recommended population represented the most probable forecast based on past trends, as well as current economic and demographic conditions.
15. On December 6, 2023, and December 20, 2023, the Planning Commission reviewed the draft CPPs in a work session.
16. On February 7, 2024, the Planning Commission held a public hearing to consider comments on the revised CPPs for the 2025 Comprehensive Plan Periodic Update.

17. It was the consensus of the majority of the Planning Commission on November 15, 2023, that the population projection represented the most favorable forecast. Following the public hearing on February 7, 2024, it was the consensus of the majority of the Planning Commission that the housing allocations, as presented in the CPPs, represents the most favorable outcome in meeting the State mandated housing requirements in the 2025 Comprehensive Plan Update.
18. The total population projection was adopted by the County on December 12, 2023 (Resolution C-85-23) to reflect a total projected population of 102,639 people by the year 2045.
19. The City of Oak Harbor was originally allocated 5,533 dwelling units for both their city limits and UGA. After conducting a capacity analysis, the City proposed accommodating 3,735 units in the city limits and the remaining 1,797 units in a UGA expansion.
20. In July 2025, the County considered Oak Harbor's recommendation for a UGA expansion and determined that the proposed expanded UGA could not reasonably be served by the City within the 20-year planning period without an annexation and adequate Capital Facilities Plan. The County and the City are developing an Interlocal Agreement to address long-term plans for the UGA.
21. In October 2025, the County and City agreed to pursue an Interlocal Agreement to annex 77.86 acres in the UGA as part of their comprehensive plan updates. The lands identified for annexation represent a probable capacity of 257 units based on city zoning. Those units were added to the City's capacity (3,735) for a revised total of 3,992 dwelling units to represent the city limits.
22. The County determined the remaining housing allocations proposed for the Oak Harbor UGA could not be reasonably accommodated due to a lack of infrastructure. Therefore, the County followed WAC 365-196-415(2)(d)(iii)(G) to reduce the housing allocations by 1,541 dwelling units.
23. These changes reduced the total population projection for the county from 102,639 to 99,202, a reduction of 3,437 people, which falls within the medium and low population projection ranges issued by the Washington Office of Financial Management.

Conclusion

The Island County Planning Commission has reviewed the proposed revised Countywide Planning Policies and hereby recommends that the Board of Island County Commissioners adopt, by ordinance, the revised and updated Countywide Planning Policies. The Planning Commission further recommends that the revised Countywide Planning Policies and Population Projections are hereby amended and replace and supersede all previous Countywide Planning Policies.

Respectfully submitted through the Island County Planning and Community Development Department to the Board of Island County Commissioners, pursuant to RCW 36.70.430, this 3rd day of December 2025 by,

 12/3/2025

Steve Schwalbe
Chair, Island County Planning Commission

ATTACHMENT 4

MEMORANDUM

To: David Kuhl – Director of Development Services and Cac Kamak – Principal Planner
City of Oak Harbor

From: Joel Farias and Clay White
Kimley-Horn and Associates, Inc.

Date: March 14th, 2025

Subject: Land Use Changes Memorandum

INTRODUCTION

The City of Oak Harbor recently completed a Land Capacity Analysis (LCA), consistent with the Island County Countywide Planning Policies and Growth Management Act (GMA) requirements. The existing conditions LCA found that there is a population and housing capacity shortfall. Employment capacity allocations set by Island County indicate that there is sufficient commercial and industrial capacity to meet projection.

The purpose of this memorandum is to outline possible code options and strategies that the City of Oak Harbor is considering to reduce the population and housing shortfall. Options are designed to increase capacity but also align with growth that may be market available during the planning period.

The main goal of these code options is to meet the revised Oak Harbor housing unit allocation in the memo sent from Island County titled “11.4.2024 IC Letter to Oak Harbor on LCA” sent in November 2024. In the memo, Island County proposes to reallocate the City’s housing target as follows:

Table 1. Revised Housing Allocation for City of Oak Harbor

AMI	Projected Housing Need
0-30%	781
>30-50%	761
>50-80%	648
>80-100%	307
>100-120%	293
>120%	945
Total	3,735

The City will use the strategies in this memo to increase the City’s land capacity for more affordable home types as outlined in the revised allocation table from Island County.

CODE OPTIONS

Several existing zoning regulations in the City of Oak Harbor code were analyzed as part of this preliminary study. The regulations which were identified to create the most capacity was building height, max lot coverage, and max density. These regulations were chosen in specific based on a code analysis of nearby cities experiencing similar levels of rapid growth (Mount Vernon, Marysville, and Arlington). Recently completed residential developments and developments currently under review were also examined as part

of this analysis to determine if developers were building at maximum densities, lot coverage, and building height.

Early code change options would need to happen together between building height, lot coverage, and density. Initial results show a substantial increase in capacity. **As a reminder, code changes were prioritized by their potential to increase the capacity of housing units affordable to households making under 80% of the AMI.** These housing units are typically mid-rise apartment developments (includes mid-rise mixed-use developments) and subsidized housing.

The preferred code changes focus on increasing development standards like building height, lot coverage, required parking, and open space. Specific areas of the City were also analyzed which represent potential areas where rezones to a mixed-use residential, transit-oriented zone type could be considered. The potential code options in **Table 2** were prepared in coordination with City of Oak Harbor staff.

Table 2: Multifamily Zoning Code Change Consideration Summary

Multifamily Zones (R-2, R-3, R-4) existing regulations	Current Code Requirement	Possible Code Change
35 ft Building Height limit	The existing 35-foot building height restriction spans every residential zone. This restriction typically limits developments to a maximum of 3 livable stories. This prohibits mid-rise multifamily which mainly serves below 80% AMI households.	Consider the following building height ranges: R-2: 40-45 ft R-3: 45-55 ft R-4: 55-65 ft <i>Note: 60 ft building height allows for 5-over-1 (5 floors wood over first floor concrete) construction.</i>
45% Max Lot Coverage	On a 1-acre property, only 19,602 sf will be available for buildings.	Scale max lot coverage from 60% in R-2 up to 80% in R-4. <i>Note: Assumption is that lot coverage and impervious surface limit will be combined, and a percentage range from 60% to 80% may be implemented depending on discussion with stormwater staff</i>
Max Densities R-2: 12 D/U per Ac R-3: 18 D/U per Ac R-4: 22 D/U per Ac RO: 22 D/U per Ac	The max densities per acre in these zones doesn't scale with any other regulation (all the residential zones have the same max building height, max lot coverage, and max impervious surface). By increasing those regulations, the max densities should also be increased.	Max Density considerations: R-2: 18-22 D/U per Ac R-3: 34-40 D/U per Ac R-4: 46-52 D/U per Ac (minimum density should be about 50-75% of the max density)
Inclusionary zoning	Incentivizing affordable housing through bonuses to density will increase the capacity for housing affordable to households making 0-30% AMI.	Consider bonus density and building height in all zones with the inclusion of permanently affordable homes.
1.5 off-street parking spaces per dwelling unit	On a 1 acre property with 22 D/U (R-4 zone), a total of 33 parking spots would be required which is about 6,600 sf of the lot (assuming 200 sf per parking stall 10'x20'), about 15% of the lot.	Scale required parking spaces from 1 for each studio/1 bd to 2 for 3+ bd units.

For existing zones allowing mixed-use developments the following code options should be considered:

- Inclusionary zoning regulations
- Increase in maximum building height limit
- Incentivize residential density in mixed-use zones

- Create a methodology for locating suitable areas for transit-oriented developments
- Parking requirements

Existing development options that will be analyzed for further capacity:

- Incentives for Accessory Dwelling Units in single family zones
- Property owner-initiated rezoning from R-1 to R-2 or R-3 as allowed by OHMC 19.12. The R-1, R-2, and R-3 zones make up the “Low Density Residential” Comprehensive Land Use. Proposed revisions to the R-2 and R-3 zone will impact the likelihood that a property owner may rezone their R-1 or R-2 zoned property to a higher intensity zone. This would increase existing residential capacity in those zones.

MEMORANDUM

To: David Kuhl – Director of Development Services and Cac Kamak – Principal Planner
City of Oak Harbor

From: Joel Farias and Clay White
Kimley-Horn and Associates, Inc.

Date: August 12th, 2024

Subject: Land Use Options Memorandum

INTRODUCTION

The City of Oak Harbor recently completed a Land Capacity Analysis (LCA), consistent with the Island County Countywide Planning Policies and Growth Management Act (GMA) requirements. The existing conditions LCA found that there is a population and housing capacity shortfall of 3,059 dwelling units and 7,920 people. Early employment capacity allocations set by Island County indicate that there is sufficient commercial and industrial capacity to meet projections. A summary of the LCA findings is provided in **Table 1** below.

Table 1: Land Capacity Analysis Findings

Subject	Findings
Housing Capacity	2,474 dwelling units
Housing Surplus (Deficit)	(3,059) dwelling units
Employment Capacity	1,770 jobs
Employment Surplus (Deficit)	551 jobs
Population Capacity	5,747 people
Population Surplus (Deficit)	(7,920) people
0-80% AMI Housing Surplus (Deficit)	(2,654) dwelling units
>80-120% AMI Housing Surplus (Deficit)	(406) dwelling units

The purpose of this memorandum is to outline possible code options the City of Oak Harbor can take to reduce the population and housing shortfall. Options are designed to increase capacity but also align with growth that may be market available during the planning period. The main goal of these code options is to start conversations with City staff, City council, and Island County to plan for the large shortfall in housing units affordable to households making between 0 and 80% of the Area Median Income. The code options described in this memo are not the only options, but just the beginning of a long conversation to bridge the projected housing gap in the City. New zones, zoning overlays, sub-area planning, UGA expansions, annexations, or a possibly a mixture of all of these will most likely be required to meet the housing needs of future populations, especially for those making under 80% AMI.

BACKGROUND AND OPTIONS

Several existing zoning regulations in the City of Oak Harbor code were analyzed as part of this preliminary study. The regulations which were identified to create the most capacity was building height, max lot coverage, and max density. These regulations were chosen in specific based on a code analysis of nearby cities experiencing similar levels of rapid growth (Mount Vernon, Marysville, and Arlington). Recently completed residential developments and developments currently under review were also examined as part of this analysis to determine if developers were building at maximum densities, lot coverage, and building height. Early code change options would need to happen together between building height, lot coverage, and density. Initial results show a substantial increase in capacity.

Three Options were explored and are explained below.

- Option 1 is “No Change”. The results for this Option are from the existing conditions LCA and a summary of the results are shown in **Table 1**.
- Option 2 is “Form-Based Code Approach”. This Option focuses on increasing development standards like building height, lot coverage, required parking, and open space. This is intended to eventually turn into a form-based code, but currently will still have a max density.
- Option 3 is “Special Planning Districts”. This Option adds an analysis of opportunity sites called potential “Special Planning Districts”. These are potential areas where rezones to a mixed-use, residential focused zone could be considered. Six different areas were identified, and the capacity results are shown in Table 5.

The code options in **Table 2** were prepared in coordination with City of Oak Harbor staff. For the purposes of this analysis the following assumptions and changes were considered:

- R-2 Zone will be the R-MD Zone (Residential Medium Density)
- The R-3 and R-4 Zone will combine to create the R-HD Zone (Residential High Density)
- The R-O, CBD-1, CBD-2, and C-1 zones will be referred to as the MU (Mixed-Use) Zone for conciseness (will still be referred to separately in tables).

Option 2: Approaching Form-Based Code

Table 2: Option 2 Summary

Multifamily Zones (R-2, R-3, R-4, RO) existing regulations	Current Code Requirement	Possible Code Change
35 ft Building Height limit	The existing 35-foot building height restriction spans every residential zone. This restriction typically limits developments to a maximum of 3 livable stories.	R-MD: 40 ft R-HD and MU: 60 ft <i>Note: 60 ft building height allows for 5-over-1 (5 floors wood over first floor concrete) construction.</i>

45% Max Lot Coverage	On a 1-acre property, only 19,602 sf will be available for buildings.	Scale max lot coverage from 60% in R-MD up to 80% in R-HD/MU. <i>Note: Assumption is that lot coverage and impervious surface limit will be combined, and a percentage range from 60% to 80% may be implemented depending on discussion with stormwater staff</i>
20% of lot Minimum open space	On a 1-acre property this would be about 8,712 sf of the lot. This regulation limits impervious surface coverage to a maximum of 80% of the lot area.	None
Max Densities R-2: 12 D/U per Ac R-3: 18 D/U per Ac R-4: 22 D/U per Ac RO: 22 D/U per Ac	The max densities per acre in these zones doesn't scale with any other regulation (all the residential zones have the same max building height, max lot coverage, and max impervious surface). By increasing those regulations, the max densities should also be increased.	Max Densities R-MD: 18 D/U per Ac R-HD: 36 D/U per Ac MU: 36 D/U per Ac CBD: 28 D/U per Ac
1.5 off-street parking spaces per dwelling unit	On a 1 acre property with 22 D/U (R-4 zone), a total of 33 parking spots would be required which is about 6,600 sf of the lot (assuming 200 sf per parking stall 10'x20'), about 15% of the lot.	Scale required parking spaces from 1 for each studio/1 bd to 2 for 3+ bd units.
1 off-street guest parking space per 8 D/U		0 required guest spaces

Option 3: Special Planning Districts

Special Planning Districts (SPDs) are areas where rezones to a mixed-use, residential focused zone could be considered. For the purposes of this specific analysis, an altered CBD zone is assumed to be used (28 du/ac max density with some commercial). These locations were analyzed based on the results from Oak Harbor's Land Capacity Analysis (LCA), 2024. LCA results show that the R-1 zone has the most capacity for housing and that the City exceeds its employment allocation, suggesting that there is more than sufficient commercial capacity within the commercial-only zones (C-3, C-4, C-5).

Based on these results, vacant and re-developable parcels in the R-1, C-3, and C-4 zones were identified. Since the goal of this analysis is to decrease the gap of the capacity for housing types affordable to 0-80% AMI, the next step is to identify areas near built out essential commercial and transportation services (grocery stores, dining, sidewalks, crosswalks, transit lines, department stores, pharmacies). Mixed-use, high-density apartments and condos near public transportation and walkable

to essential services are the most optimal developments serving households making between 0-80% of the AMI. These areas should also be largely outside of critical areas.

Six different areas were identified with these qualities and are shown in Appendix B. The lots in these areas are comprised mostly of R-1, C-3 zoned lots that are either vacant or identified as re-developable. A full list of the affected parcel numbers is also attached in Appendix B.

FINDINGS

Table 3 shows that Option 2 would yield **650** additional units of capacity. The increase is two-fold since an increase in density, lot coverage, and building height would directly impact vacant parcels to develop at much higher densities, but these code changes would also increase the land value of any lot in these zones. The increase in land value affects the improvement-to-land-value ratio of the parcels and some crossed the 0.5 threshold to be able to be classified as “Re-developable”, therefore classifying them as a parcel that may redevelop in the next 20 years. Note that these land value increases are assumptions that were made without an official market analysis. The assumed land value increases are shown in **Table 4**.

Most of the new capacity comes from directly increasing the max density of the zones, but this density is only possible by also increasing building height and max lot coverage.

Table 3: Option 2 Capacity Increase

Zones	Existing Net capacity	New Net capacity	Increase
R-1	1,326	1,326	0
R-2	150	222	72
R-3	309	499	190
R-4	498	722	224
RO	39	84	45
CBD	58	91	33
CBD-1	34	57	23
CBD-2	35	60	25
C-1	25	41	16
Totals	2,474	3,102	628

Table 4: Assumed Land Value Increase

Zone	Assumed land value increase	New Max Density (DU)	New Max Lot Coverage	New Max Building Height (Ft)
R-2	10%	18	60%	40
R-3	30%	36	80%	60
R-4	20%	36	80%	60
RO	30%	36	80%	60

Table 5 shows the capacity increase when implementing the identified Special Planning Districts. A total increase of **1,003** housing units was analyzed. Since the SPDs are being developed with mixed use buildings, they also create employment capacity.

Table 5: Option 3 Capacity Increase

Zones	Existing Net capacity	New Net capacity	Increase
R-1	1,326	1,324	(2)
R-2	150	216	66
R-3	309	499	190
R-4	498	722	224
RO	39	85	46
CBD	58	473	415
CBD-1	34	57	23
CBD-2	35	60	25
C-1	25	41	16
Totals	2,474	3,477	1,003

HOUSING NEEDS GAPS

Both Option 2 and 3 were created with the goal to shrink the housing needs gap for housing types affordable to households making 0-80% of the AMI. **Table 6** shows the base housing capacity of the City's zones under existing conditions (Option 1) compared to the increase in capacity using Option 2. The largest increase can be seen in the capacity for housing types that are generally affordable to households making 0-30% and >50-80% of the AMI.

Table 6: Option 2 Assumed Housing Capacity by AMI

Income Level (AMI ¹)	Projected Housing Need	Projected Capacity	Surplus (Deficit)	Option 2 Projected Capacity	Modified Surplus (Deficit)	Net Change (+)
0-30%	1,158	67	(1,091)	344	(814)	277
>30-50%	1,127	187	(940)	343	(784)	156
>50-80%	960	336	(624)	484	(476)	148
>80-100%	455	399	(56)	372	(83)	-27
>100-120%	434	325	(109)	368	(66)	43
>120%	1,400	1,159	(241)	1191	(209)	32
Total	5,533	2,474	(3,060)	3,102	(2,432)	628

In total the Option 2 projected capacity is 3,102 dwelling units. An increase of 628 dwelling units from capacity under Option 1.

With an increase of 628 housing unit capacity, there is still a large deficit of housing types affordable to households making between 0-80% AMI. A total deficit of 2,074 dwelling units can be seen for housing affordable to those income groups under Option 2. In Option 3, spot zoning options were explored to shorten this gap.

Option 3 of the LCA is focused on increasing capacity of housing types affordable to households making 0-80% AMI by creating special planning districts. **Table 7** shows the capacity increase under Option 3 broken down by AMI levels. The largest increases can be seen in the 0-80% AMI groups. With the spot rezones of six different special planning districts to a CBD-like zone, 1,003 units of housing capacity is created over Option 1 for a total of 3,477 housing units of capacity within the City limits but is still 2,057 units under the allocated housing capacity. Most noticeably a deficit in housing affordable to the 0-80% AMI households (deficit of 1,809).

Table 7: Option 3 Assumed Housing Capacity by AMI

Income Level (AMI ¹)	Projected Housing Need	Projected Capacity	Surplus (Deficit)	Option 3 Projected Capacity	Modified Surplus (Deficit)	Net Change (+)
0-30%	1,158	67	(1,091)	420	(738)	353
>30-50%	1,127	187	(940)	438	(689)	251
>50-80%	960	336	(624)	579	(381)	243
>80-100%	455	399	(56)	447	(8)	48
>100-120%	434	325	(109)	405	(29)	80
>120%	1,400	1,159	(241)	1,188	(212)	29
Total	5,533	2,474	(3,060)	3,477	(2,057)	1,003

The housing allocation set by Island County of 5,533 housing units is allocated to both within the city limits and outside in the City's Urban Growth Area. The City is only responsible for analyzing the zoned area within its city limits and therefore the remaining 2,057 units will fall under the County's responsibility.

APPENDIX A

CONSTRAINTS AND ASSUMPTIONS

Assumptions

Assumed Housing Allocation Ratios (Option 2)

Residential Zones	0-30%	>30-50%	>50-80%	>80-100%	>100-120%	>120%
R-1	0	0	0.05	0.05	0.1	0.8
R-2	0.1	0.15	0.15	0.15	0.25	0.2
R-3	0.15	0.1	0.25	0.25	0.15	0.1
R-4	0.25	0.25	0.25	0.1	0.1	0.05
R-O	0.2	0.2	0.2	0.3	0.1	0
CBD	0.2	0.25	0.25	0.2	0.1	0
CBD-2	0.2	0.25	0.25	0.2	0.1	0
C-1	0.2	0.25	0.25	0.2	0.1	0
CBD-1	0.2	0.25	0.25	0.2	0.1	0

Assumed Housing Allocation Ratios (Option 3)

Residential Zones	0-30%	>30-50%	>50-80%	>80-100%	>100-120%	>120%
R-1	0	0	0.05	0.05	0.1	0.8
R-2	0.1	0.15	0.15	0.15	0.25	0.2
R-3	0.15	0.1	0.25	0.25	0.15	0.1
R-4	0.25	0.25	0.25	0.1	0.1	0.05
R-O	0.2	0.2	0.2	0.3	0.1	0
CBD	0.2	0.25	0.25	0.2	0.1	0
CBD-2	0.2	0.25	0.25	0.2	0.1	0
C-1	0.2	0.25	0.25	0.2	0.1	0
CBD-1	0.2	0.25	0.25	0.2	0.1	0

Constraints

Constraint or adjustment factor	Definition from <u>Island County CPPs</u>	Constraint
Critical areas constraint	A number representing the percentage of land (specific to each area analyzed) which is presumed to be constrained by critical areas, and therefore less likely to be available for development.	21%
Public purposes deduction	In RAIDs and UGAs, 15% of available land will be needed for public purposes.	15%
Seasonal/	Some dwelling units will not be available for residential occupancy, as they are used for	0.9%

Constraint or adjustment factor	Definition from <u>Island County CPPs</u>	Constraint
recreational adjustment factor	short term rentals (e.g., VRBOs), second homes, etc. A seasonal/recreational factor will be based on the most current census data but may be refined using local data.	
Market adjustment factor	none	Included within other adjustments
Vacancy rate adjustment	A reasonable factor for vacant units will be based on the most current census data but may be refined using local data.	5.89%

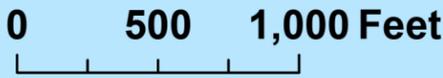
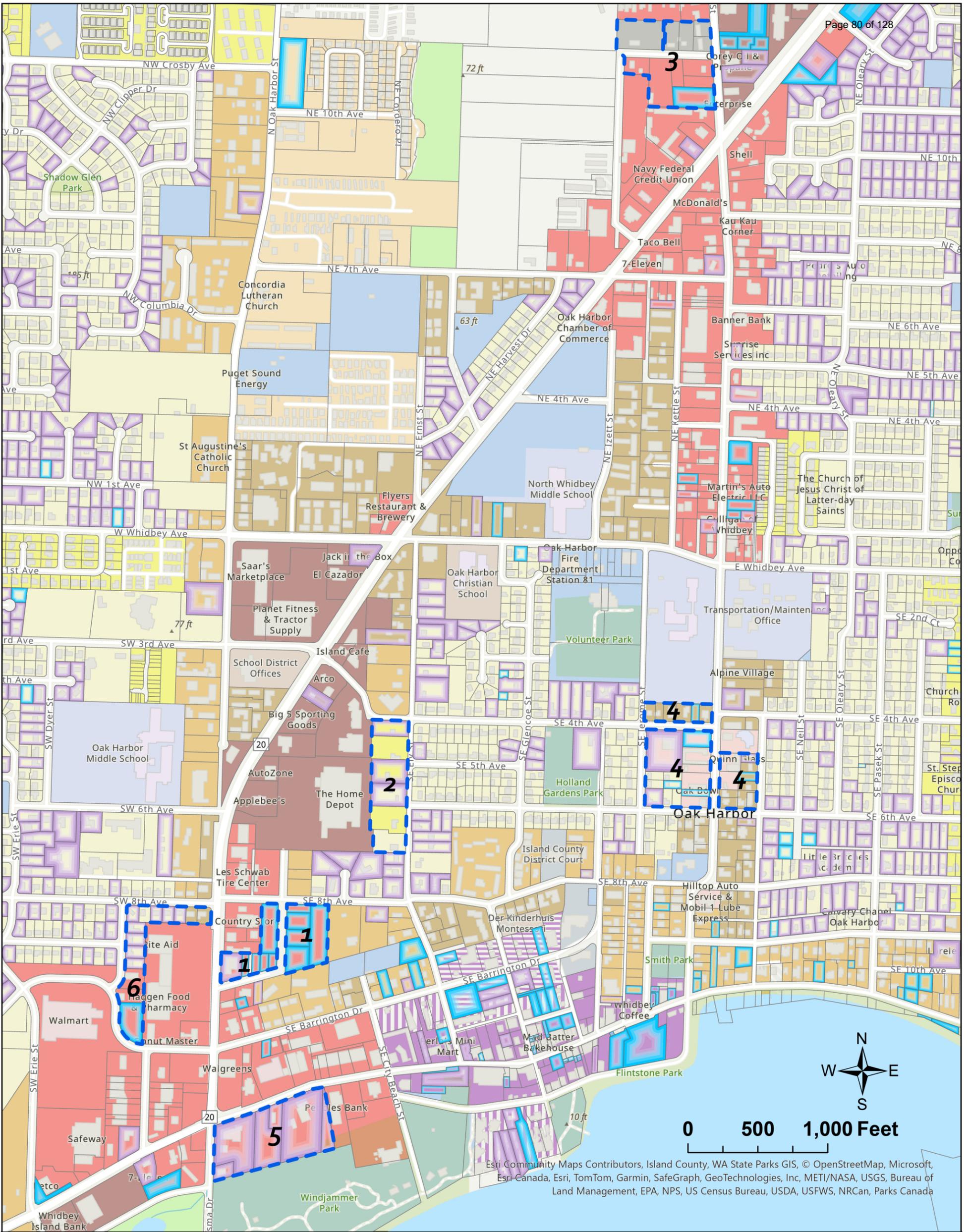
The CPPs also required adjustments specific to each zone.

Constraint/adjustment factor	Applicable Zone	Adjustment % from Island County CPPs
Vacant parcels adjustment factor	Residential Zones	10%
Partially Vacant Parcels adjustment factor	Single Family Zones	Between 0-90% based on lot size.
Re-Development Factor	Multifamily, Mixed-Use Residential, Mixed-Use Commercial, and Commercial Zones	50%



APPENDIX B

LCA MAPS



Esri Community Maps Contributors, Island County, WA State Parks GIS, © OpenStreetMap, Microsoft, Esri Canada, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, USFWS, NRCAN, Parks Canada

LCA Option #3

Redevelopable	NAS	C-5	Maritime	R-3
Vacant	C-1	CBD	OS	R-4
Parcels	C-3	CBD-1	PF	R-O
	C-4	CBD-2	R-1	Special Planning District
		I	R-2	

APPENDIX C HOUSING PROJECTIONS AND PRELIMINARY EMPLOYMENT PROJECTIONS

	A	B	C	D	E	F	G	H	I	J	K	L	M	N
1		2022 Jobs Total	% Share	Est. 2045 Total	Difference	Urban Rural Split								
2		17,640		20,348	2,708	Urban (City Limits & NMUGA)	Rural (UGA or County)							
3	Oak Harbor													
4	Military*	10,800		10,800	0	0	0		*NASWI current jobs of 10,800 includes 8,700 active duty and 2,100 civilians					
5	Non-Military	6,233	45.00%	7,452	1,219	1219	256							
6	Coupeville	2,484	15.00%	2,891	406	406	0							
7	Langley	587	5.00%	722	135	135	0		Population to Employment Ratio					
8	Island County	8,335	35.00%	9,283	948	95	597		PER Calculations		2.16408443	2.236530521		
9										2021	2045			
10										State population	7,766,925	9,533,435		
11										State employment	3,589,012	4,262,600		
12										Change	0.07244609			
13										2022	2045			
14										PER CALC	4.97165533	5.044101417		
15										IC population	87,700	102,639		
16										IC employment	17,640	20,348		
17										Change in 20 years	2,708			
18														
19										Notes:				
20										Baseline jobs data pulled from ESD 2022.				
21										Area specific baseline jobs data for 2022 was derived from Census 2021 data.				
22										Percentage shares were derived by starting with where existing jobs are located				
23										Freeland is 10% of County's overall share.				
24										OH Rural allocation is 30% of County's rural share.				

Housing For All Planning Tool (HAPT)

Housing Units by Income Level

Island County	Projection Year: 2045		Permanent Housing Needs by Income Level (% of Area Median Income)							Emergency Housing Needs (Temporary)	
	Population Target = 102,639		Total	0-30%		>30-50%	>50-80%	>80-100%	>100-120%		>120%
				Non-PSH	PSH						
	Countywide Estimated Housing Supply (2020)		37,272	1,210	18	2,915	7,479	5,878	4,734	15,038	116
	Countywide Additional Units Needed (2020-2045)		8,717	986	838	1,775	1,512	717	683	2,206	265
	Sum of Allocation to Jurisdictions (from User Inputs)		8,717	986	838	1,775	1,512	717	683	2,206	266
User Input - % Share of County Population Growth. Values must sum to 100%			100.00%	<-- Sum of user inputs for jurisdiction shares of county future net housing need. If below 100%, increase shares. If above 100%, decrease shares.							
			* The location of 10 existing permanent supportive housing units within Island County is unknown. Therefore, they are not included in the jurisdiction table below.								
			Total	0-30%		>30-50%	>50-80%	>80-100%	>100-120%	>120%	Emergency Housing Needs (Temporary)
27.39 %	Unincorporated Island County	Estimated Housing Supply (2020)	25,445	598	8	1,580	3,311	3,676	3,788	12,484	28
		Allocation Method A (2020-2045)	2,388	270	230	486	414	196	187	604	73
4.02 %	Coupeville town	Estimated Housing Supply (2020)	1,017	73	0	191	162	77	118	396	0
		Allocation Method A (2020-2045)	350	40	34	71	61	29	27	89	11
5.12 %	Langley city	Estimated Housing Supply (2020)	743	74	0	34	90	125	107	313	21
		Allocation Method A (2020-2045)	446	50	43	91	77	37	35	113	14
63.47 %	Oak Harbor city	Estimated Housing Supply (2020)	10,057	465	0	1,110	3,916	2,000	721	1,845	67
		Allocation Method A (2020-2045)	5,533	626	532	1,127	960	455	434	1,400	168

MEMORANDUM

To: Cac Kamak – Principal Planner
City of Oak Harbor

From: Joel Farias and Clay White, Kimley-Horn and Associates, Inc
Matt Covert and Alex Capron, Facet

Date: September 17th, 2024

Subject: Land Capacity Analysis Memorandum

INTRODUCTION AND INITIAL FINDINGS

The City of Oak Harbor (City) contracted Kimley-Horn and Associates, Inc. (Kimley-Horn) to prepare a Land Capacity Analysis (LCA) consistent with the Growth Management Act (GMA) requirements in [RCW 36.70A.115](#) and [WAC 365-196-325](#). The LCA was prepared based on the adopted methodology within the Island County Countywide Planning Policies. The LCA reviews existing capacity for population, housing, and employment and options the City can consider to accommodate additional growth, consistent with its population and housing targets and employment projections.

Table 1 summarizes the initial findings of the LCA under existing conditions. **Overall, the City LCA shows insufficient total capacity for both housing and population allocations.** Early 20-year employment allocations from Island County show that **the projected employment capacity in the City is sufficient.** In addition, the LCA highlights a housing shortfall when comparing housing capacity and housing needs by income band. The largest deficits were found in the City's capacity to provide housing for the 0-30% Area Median Income (AMI), >30-50% AMI, and >50-80% AMI brackets under existing zoning. **Table 1** summarizes the findings.

Table 1: Initial Findings Summary

Subject	Findings
Housing Capacity	2,474 dwelling units
Housing Surplus (Deficit)	(3,059) dwelling units
Employment Capacity	1,770 jobs
Employment Surplus (Deficit)	551 jobs
Population Capacity	5,747 people
Population Surplus (Deficit)	(7,920) people
0-80% AMI Housing Surplus (Deficit)	(2,654) dwelling units
>80-120% AMI Housing Surplus (Deficit)	(406) dwelling units

TERMINOLOGY AND ACRONYMS

The following definitions are from the Department of Commerce housing resources and State code.

Affordable Housing	The United States Department of Housing and Urban Development (HUD) considers housing to be affordable if the household is spending no more than 30 percent of its income on housing costs.
American Community Survey (ACS)	This is an ongoing nationwide survey conducted by the U.S. Census Bureau. It designed to provide communities with current data about how they are changing. The ACS collects information such as age, race, income, commute time to work, home value, veteran status, and other important data from U.S. households. ACS data is commonly used for the Community Profile section of a housing needs assessment.
Area Median Income (AMI)	This is a term that commonly refers to the area-wide median family income (MFI) calculation provided by the Department of Housing and Urban Development (HUD) for a county or metropolitan region.
Accessory Dwelling Unit (ADU)	A dwelling unit located on the same lot as a single-family housing unit, duplex, triplex, townhome, or other housing unit.
Cost Burden	When a household pays more than 30 percent of their gross income on housing, including utilities, they are “cost-burdened.” When a household pays more than 50 percent of their gross income on housing, including utilities, they are “severely cost-burdened.” Or “extremely cost-burdened”.
Dwelling unit (DU, D/U, du, d/u)	A single unit providing complete independent living facilities for one or more persons, including permanent provisions for living, sleeping, eating, cooking and sanitation.
Household	A household is a group of people living within the same housing unit. ² The people can be related, such as family. A person living alone in a housing unit, or a group of unrelated people sharing a housing unit, is also counted as a household.
U.S. Department of Housing and Urban Development (HUD)	HUD administers federal housing and urban development laws. It collects, analyzes, and distributes housing data beyond what is collected through the U.S. Census Bureau. Data produced by HUD is heavily used in the analysis in this report.
Household Income	The census defines household income as the sum of the income of all people 15 years and older living together in a household.

Income-Restricted Housing	This term refers to housing units that are only available to households with incomes at or below a set income limit and are offered for rent or sale at a below-market rates. Some income-restricted rental housing is owned by a city or housing authority, while others may be privately owned.
Low-Income	Families that are designated as low-income may qualify for income-subsidized housing units. HUD categorizes families as low-income, very low-income, or extremely low-income relative to area median family incomes (MFI), with consideration for family size.
North American Industry Classification System (NAICS)	The North American Industry Classification System (NAICS) is the standard used by Federal statistical agencies in classifying business establishments for the purpose of collecting, analyzing, and publishing statistical data related to the U.S. business economy (Census.gov).
Median Family Income (MFI)	The median income of all family households in the metropolitan region or county. Analyses of housing affordability typically group all households by income level relative to area median family income. Median income of non-family households is typically lower than for family households. In this report, both MFI and AMI refer to the U.S. Department of Housing and Urban Development Area Median Family Income (HAMFI).
Permanent supportive housing (PSH)	Subsidized, leased housing with no limit on length of stay that prioritizes people who need comprehensive support services to retain tenancy and utilizes admissions practices designed to use lower barriers to entry than would be typical for other subsidized or unsubsidized rental housing, especially related to rental history, criminal history, and personal behaviors. Permanent supportive housing is paired with on-site or off-site voluntary services designed to support a person living with a complex and disabling behavioral health or physical health condition who was experiencing homelessness or was at imminent risk of homelessness prior to moving into housing to retain their housing and be a successful tenant in a housing arrangement, improve the resident's health status, and connect the resident of the housing with community-based health care, treatment, or employment services.

METHODOLOGY AND TARGETS

As part of the City of Oak Harbor's 2025 Comprehensive Plan Periodic update, an analysis of housing, population, and employment land capacities is required. This analysis is conducted utilizing Island County's LCA methodology as outlined in the [Countywide Planning Policies](#) (CPPs). The objective is to determine whether Oak Harbor possesses sufficient land densities and buildable lands to accommodate anticipated future growth.

Island County, in compliance with the 2021 Washington House Bill 1220 amendments to the GMA, has allocated projected growth to the City of Oak Harbor by population and income band. The allocation to the City are presented in **Table 2** and the resulting population targets are presented in **Table 3**. This new legislation requires jurisdictions to address the housing needs of extremely low-, very low-, low-, and moderate-income populations as part of their Comprehensive Plan updates. To satisfy this requirement, an analysis of the City's existing and proposed zoning and development regulations is required to show that the housing types and quantities that meet the need of each income bracket is available.

Table 2: City of Oak Harbor Permanent Housing Needs by Income Level (% of Area Median Income)

2020-2045	Total	0-30% Non-PSH	0-30% PSH *	>30-50%	>50-80%	>80-100%	>100-120%	>120%
Estimated Housing Supply (2020)	10,057	465	0	1,110	3,916	2,000	721	1,845
Oak Harbor Housing Targets (2020-2045) Allocation Method A	5,533	626	532	1,127	960	455	434	1,400

Source: Island County Housing for All Planning Tool (HAPT), 2023

Table 3: Population Targets

City	2020 Total Population	2045 Population Allocation	20-Year Population Increase	20-Year Growth Rate
Oak Harbor	24,840	38,507	13,666	55%

Source: Island County Housing for All Planning Tool (HAPT), 2023. Based on 2.47 persons per household, per ACS 5-Yr 2018-2022, Table S1101

CURRENT CONDITIONS

A detailed analysis was conducted on the City's existing conditions. The analysis included a review of the City's recently approved building permits, existing housing units, assessor parcel data, and City code. The most recent US Census Bureau data (2020) shows that there are 10,057 housing units in the city. The table below shows the housing units which have been built since 2020, are under construction, or will be built in the next couple years. These units are considered pipeline units.

Table 4: Pipeline Units (based off approved engineering permits, plat, and building permits)

Zone*	Number of Units
R-1	99
R-2	28
R-3	119
R-4	199
R-O	6
Total	451

*More information about the City's zoning districts can be found in the municipal code chapter [19.20](#).

DEVELOPMENT CONSTRAINTS AND ADJUSTMENTS

The Island County LCA Methodology found in the CPPs outlines which development constraints to apply for the LCA, a full list can be found in **Table 5** and **Table 6**. The CPPs also specify that "low probability for development" parcels be removed from the analysis and how those parcels are identified. They are defined as parcels which are:

- Tax exempt (parks, schools, churches, and public facilities)
- Gas stations and condos
- Tracts and easements for access, landscaping, stormwater, or other utility
- Other parcels identified by staff as being low probability for development (infrastructure constraints)

A total of 1,594 parcels, which met the above conditions, were removed from further analysis. The parcels consisted mostly of tax-exempt parcels. The other parcels which were removed were condos, tracts, easements, SNR/DSBL, U500, and "Reference Only" parcels. An additional 75 parcels were removed due to being pipeline parcels, church property that wasn't classified as tax exempt, parcels soon to be rezoned to public use, utility parcels, and mislabeled senior facilities.

The most significant constraint in Oak Harbor is the required Critical Area Constraint Factor, which represents the percentage of zoned land in the City which is constrained by critical areas and their buffers. Other constraints and adjustments are vacancy, seasonal/recreational use, public use, vacant parcel factor, re-development factor, and partially vacant factor.

Detailed constraint and adjustment information can be found in [Appendix A](#).

Table 5 shows the required constraints and adjustments under Island County CPPs. **Table 6** shows the required zone-specific adjustments.

Table 5: Required Constraints and Adjustments

Constraint/ adjustment factor	Constraint
Critical areas constraint	20.7%
Public purposes deduction	15%
Seasonal/ recreational adjustment factor	0.9%
Market adjustment factor	Included within other adjustments
Vacancy rate adjustment	5.89% (calculated from adding up vacant, for sale, and for rent units in Census Table H5)

Table 6: Zone Specific Adjustments

Adjustment factor	Applicable Zone	Adjustment % from Island County CPPs
Vacant parcels adjustment factor	All zones (This factor means that the County assumes 10% of all vacant parcels will not develop in the next 20 years)	10%
Partially Vacant Parcels adjustment factor	Single Family Zones	Between 0-90% based on lot size.
Re-Development Factor	Multifamily, Mixed-Use Residential, Mixed-Use Commercial, and Commercial Zones	50%

DEVELOPMENT POTENTIAL

The Island County CPPs outline the methodology for how to calculate housing and employment development potential for each zone. For the residential zones each parcel is either occupied, vacant, or partially vacant. For mixed use, commercial, and industrial zones, each parcel is either built-out, vacant, or re-developable. Partially vacant is assigned to lots which already have a housing unit, but the lot size exceeds double the minimum lot size, therefore having potential to subdivide into two lots. As described in the constraints section, there is a sliding scale adjustment that takes into account the probability a lot would subdivide based on how many times larger the lot is than the minimum lot size. For example, a lot that is more than four times larger the minimum lot size would have a 0% adjustment, which implies that there is a 100% chance (before critical area and public use adjustments) the lot would subdivide in the 20-year planning period.

To determine the total net potential units from all zones, all the constraints and adjustments were applied, and it was found that there is capacity for a total of 2,023 dwelling units and 143 acres of employment capacity using the County CPP Methodology, which is based off minimum lot size for

density. **Table 7** shows the results of the housing capacity analysis per zone and **Table 8** shows the results of the employment capacity analysis per zone.

Table 7: Number of potential units, in dwelling units (using max density)

Zone	Vacant*	Re-developable*	Vacant + Re-developable	Critical Areas Deduction (21%)	Public Land Deduction (15%) and Total
R-1	399	1,422	1,821	1,444	1,227
R-2	150	31	181	144	122
R-3	35	247	282	224	190
R-4	155	290	445	353	299
R-O	28	22	50	40	33
C-1	18	20	37	30	25
CBD	73	14	87	69	58
CBD-1	28	23	51	40	34
CBD-2	45	8	53	42	35
Total	931	2,077	3,007	2,385	2,023

*The Vacant parcels adjustment of 10%, Re-developable factor of 50%, and the scaling partially vacant factor (between 0-90%) have already been applied to the results in these columns.

Table 8: Area with employment capacity potential, in acres

Zone	Vacant Acres	Re-developable Acres	Total Development Potential (Acres)	Critical Areas Deduction	Public Land Deduction
C-1	0.80	0.90	1.70	1.35	1.14
C-3	23.36	8.71	32.07	25.44	21.62
C-4	40.47	5.33	45.79	36.31	30.87
C-5	10.01	3.37	13.38	10.61	9.02
CBD	4.55	0.82	5.37	4.26	3.62
CBD-1	1.54	1.14	2.69	2.13	1.81
CBD-2	2.45	0.38	2.83	2.25	1.91
I	85.89	21.76	107.66	85.37	72.57
Maritime	0.87	0.00	0.87	0.69	0.58
All Zones	169.94	42.42	212.36	168.40	143.1

FINAL CAPACITY RESULTS

The total development potential per zone in **Table 7** is then used to find the total housing capacity in the City by adding in the pipeline units from **Table 4**. The results are shown in **Table 9**. By adding on the pipeline units, the total housing unit capacity under existing conditions is 2,474. Island County allocated 5,533 housing units to the City and these results show a deficit of 3,059 units.

Table 9: Housing Capacity

Zone	Residential Unit Potential	Pipeline Units	Total Units
R-1	1,227	99	1,326
R-2	122	28	150
R-3	190	119	309
R-4	299	199	498
R-O	33	6	39
C-1	25	0	25
CBD	58	0	58
CBD-1	34	0	34
CBD-2	35	0	35
Total	2,023	451	2,474

Using the total housing capacity of 2,474, census data was utilized to estimate the number of people that can be accommodated based on existing zoning in the city. Per census data the local average household size is 2.47. Occupancy rate was also considered and calculated using US census data, which shows that 5.89% of the housing units in Oak Harbor are unoccupied. **Table 10** shows the estimated population growth capacity of each zone under existing conditions compared to the projected population growth.

Table 10: Population Capacity

Zone	Total Units	Occupancy Rate	Total Occupied Units	Population Capacity
R-1	1,354	5.89%	1,248	3,082
R-2	150	5.89%	141	348
R-3	317	5.89%	291	718
R-4	498	5.89%	469	1,157
R-O	48	5.89%	37	90
C-1	25	5.89%	24	58
CBD	58	5.89%	55	134
CBD-1	34	5.89%	32	79
CBD-2	35	5.89%	33	81
			Total	5,747
			Target	13,667
			Projected Surplus (Deficit)	(7,920)

The results show in **Table 10** shows that there is insufficient capacity in the city to accommodate for the total projected growth under existing conditions.

Island County CPPs indicate that employment capacity be designated based off net developable acres in the commercial and mixed-use commercial zones at a rate of 17 employees per acre and industrial zones at a rate of 8 employees per acre. The net development potential was shown in **Table 8** and were used to calculate total employment capacity for the City.

Table 11: Employment Capacity

Zone	Net Developable Acres	Employment Density	Employment Capacity
C-1	1.14	17 per acre	19
C-3	21.62	17 per acre	367
C-4	30.87	17 per acre	524
C-5	9.02	17 per acre	153
CBD	3.62	17 per acre	61
CBD-1	1.81	17 per acre	30
CBD-2	1.91	17 per acre	32
Commercial Subtotal	69.99	17 per acre	1,186
I	72.57	8 per acre	580
Maritime	0.58	8 per acre	4
Industrial Subtotal	73.15	8 per acre	584
All Zones	143.14	Total	1,770 Employees

Table 11 shows that there is capacity for 1,770 jobs under existing conditions. Industrial zones make up 584 of this job capacity and commercial zones make up 1,186. Final job capacity allocations are still being computed by Island County, but initial projections result in a surplus of **551** jobs.

CAPACITY NEEDED BY INCOME BAND

Commerce guidance instructs cities to compare land capacity with housing needs by income band. Therefore, the analysis outlines, based on existing housing diversity and local conditions, which types of housing each zone permits and what income brackets and AMI they align with. For example, the R-2 zone in Oak Harbor allows detached single-family homes, duplexes, multifamily buildings, townhouses, supportive housing, and ADUs. Since these housing types have potential to serve different AMI brackets, there was a weight added to each of the housing types in the zones based on the probability of each housing type being built over the next 20 years. This breakdown for all the zones is shown in **Table 12** and **Table 13**. This probability is an assumption based on city staff knowledge, historical building trends, existing zoning, and existing market factors. Based on the weight of each housing type, a total capacity for each AMI bracket was able to be calculated by multiplying the weight by the total capacity in each zone.

The results are shown in **Table 14**. This weight is presented in the form of a ratio and the total ratio for each zone will ultimately add up to 1.0. The ratio is used due to zones allowing diverse housing types that serve multiple income brackets. The breakdown of the ratios used for each zone can be found in [Appendix A](#).

Table 12: Housing Types Commonly Affordable for each Income Level (AMI=\$102,000 per HUD)

Income Level	AMI Ranges	Housing Types
0-30%	\$0 - \$30,600	Subsidized or rent/income-restricted housing units, supportive housing
>30-50%	\$30,600 - \$51,000	High density, income restricted apartments or housing unit, supportive housing
>50-80%	\$51,000 - \$81,600	Mobile homes parks, Mid-high density apartments (3-4 floor apartment buildings, courtyard apartments, condos), ADU
>80-100%	\$81,600 - \$102,000	Manufactured home, duplex, triplex, low-mid density apartments (walk up apartments, condos, courtyard apartments, cottages), ADU
>100-120%	\$102,000 - \$122,400	Duplex, townhouse, manufactured home, triplex, quadplex,
>120%	\$122,400+	Detached Single-family, duplex, townhouse

Table 13: Housing types allowed in City Zones (OHMC 19.20.1050 Permitted uses)

City Zones	Housing Types permitted in each Zone
R-1	Single Family detached, duplex, Manufactured homes, ADU, supportive housing
R-2	Single Family detached, duplex, Mobile home/manufactured home parks, low-density multifamily, townhomes, cottage housing, ADU, supportive housing
R-3	Medium to high density multi-family (low-mid rise apartments, condos, townhomes), duplex, Manufactured homes, supportive housing
R-4	High density multi-family (apartments, condos), duplex, Manufactured homes, supportive housing

R-O	High density multi-family (apartments, condos), duplex, Manufactured homes, supportive housing
CBD	High density multi-family (mixed use)
CBD-1	High density multi-family (mixed use)
CBD-2	High density multi-family (mixed use) (45 ft height limit for residential uses)
C-1	High density multi-family (Mixed use apartments, condos)

Housing affordability capacity per zone can be calculated based on the above housing affordability assumptions and the total housing capacity shown in **Table 9**. The capacity was compared to the housing allocations set by Island County (shown in **Table 2**) to calculate the total surplus and deficit for each AMI bracket. The results can be found in **Table 14**.

Table 14: Housing Needs Results using Standard Zoning Regulations

Income Level (AMI ¹)	Income Bracket	Zones	Projected Housing Need	Projected Capacity	Surplus (Deficit)
0-30%	\$0 - \$30,600	R-4, CBD	1,158	67	(1,091)
>30-50%	\$30,600 - \$51,000	R-3, R-4, R-O, CBD, C-1	1,127	187	(940)
>50-80%	\$51,000 - \$81,600	All	960	336	(624)
>80-100%	\$81,600 - \$102,000	All	455	399	(56)
>100-120%	\$102,000 - \$122,400	All	434	325	(109)
>120%	\$122,400+	R-1, R-2, R-3	1,400	1,159	(241)
Total			5,534	2,474	(3,060)

1. AMI = Area median income

Table 14 shows that there is insufficient capacity in the city limits to accommodate for the projected housing need in all the AMI levels. There is the most potential capacity in zones (R-1) where allowed housing types (single family detached, duplex) are affordable for households making more than 120% of the AMI. This is mostly due to how large the R-1 zone is and that most of the development potential capacity is within the R-1 zone.

The largest deficiencies are seen in the 0-30%, >30-50%, and >50-80% income bands. The housing types that would need to be planned for to meet the allocation would need to be subsidized units, income/rent-restricted, supportive housing, high-density apartments, or affordable mobile home parks. Changes to existing regulations that subsidize, incentivize, and decrease barriers for the construction of housing types affordable to 0-80% AMI should be targeted. However, even with extreme changes to zoning regulations, availability of land area within City boundaries will ultimately limit capacity.

FINDINGS

The City's LCA found that there is insufficient capacity for the housing units allocated to the City by Island County. More importantly, there are large deficits when converting the total housing capacity to specific household income brackets. The following table shows the largest deficiencies that were found after comparing the net capacity per income bracket to the [County allocations in the CPPs](#).

Table 15: Housing Needs Results

Income Level (AMI)	Allocation per CPPs	Projected Capacity under Existing Conditions	Surplus (Deficit)
0-30%	1,158	67	(1,091)
>30-50%	1,127	187	(940)
>50-80%	960	336	(624)

The gap was found in the City's capacity to serve extremely low-, very low-, and low-income households (0-30%, >30-50%, and >50-80%). The housing types that typically serve these households are mid to high rise apartments, subsidized housing, supportive housing, and income restricted housing.

Before the potentially developable area for each zone was calculated, 1,594 total parcels were removed from the analysis due to being identified as "low probability for development". These are parcels that may interfere with the results of this analysis due to classifying as either vacant, re-developable, or partially vacant, but have close zero chance of developing. These parcels were access easements, tax exempt lots, public use lots, lots without access to essential infrastructure, and other special uses (condos, gas stations).

Final employment projections for each city are still under development by the county. Initial projections show that the Oak Harbor will need to plan for a total of 1,219 jobs within city limits by 2045. This analysis shows that there is capacity for 1,770 jobs under existing zoning. This means the City has sufficient commercial capacity within the city limits for future employment needs. Early projections were released July 25th, 2024, and can be found in [Appendix C](#).

The next step after this LCA will be to develop zoning regulations and standards that will help bridge the gap between the current estimated housing capacity and the housing capacity allocated to the City by the County. These solutions will be developed in conjunction with City staff, Planning Commission, City Council, Island County, local developers, local business owners, and the residents of Oak Harbor. Any additional capacity that can be added through zoning changes will decrease the housing burden on the County.



APPENDIX A

CONSTRAINTS AND ASSUMPTIONS

Assumptions

Assumed Housing Allocation Ratios

Residential Zones	0-30%	>30-50%	>50-80%*	>80-100%	>100-120%	>120%
R-1			0.05	0.05	0.1	0.8
R-2			0.15	0.15	0.25	0.45
R-3		0.1	0.25	0.3	0.25	0.1
R-4	0.1	0.25	0.25	0.3	0.1	
R-O	0.1	0.1	0.2	0.5	0.1	
C-1	0.05	0.1	0.2	0.4	0.25	
CBD	0.1	0.25	0.25	0.3	0.1	
CBD-1	0.1	0.1	0.3	0.3	0.2	
CBD-2	0.1	0.25	0.25	0.3	0.1	

*NOTE: PRDs give the option to increase base density by 30% with the provision that for every 5 bonus D/U, 1 affordable unit shall be built (under 80% AMI). Only applies to R-1 through R-4 zones

Critical area buffers and methodology

For each UGA, compile all available critical area mapping information and merge these layers into a single layer to determine the total quantity of constrained acreage in each zoning designation. Calculate the percentage of land area within each UGA that is constrained by critical areas by comparing the number of acres constrained by critical areas to the total number of acres in each UGA. This calculation will result in a critical area constraint factor for each UGA.

- Downloaded Island County and NW wetland data and merged and dissolved into one wetland shapefile. (This also covers the streams that cross portions of the City's area.) This creates the file for Oak Harbor's wetlands.
- Downloaded Island County's 5-foot contours. Clipped using a rectangle Converted these to a slope raster and conducted a slope analysis. Converted to a polygon shapefile and deleted slopes under 15 percent. Dissolved all features for slopes \geq 15 percent to get a steep slopes shapefile.
- Downloaded FEMA flood hazard areas GIS shapefile. This is the "frequently flooded areas" shapefile.
- Exported the City's Fish and Wildlife map to a JPEG. Loaded and georeferenced into a project in ArcPro. Created new feature classes for Garry Oak and Bald Eagle habitat.
- Merged the four sets of data above using Model Builder. Dissolved the resulting shapefile to get a critical areas mosaic shapefile.
- Performed a geometric union of this mosaic and the dissolved zoning shapefile (with definition query to exclude parcels without zoning) from #2 above.

- Selected features with a critical areas FID value of 1 and a zoning FID value of 1 to select all features that are within city zoning and are overlaid by the critical areas mosaic. Created a statistics table to calculate area.

After following the steps above, we calculate the following areas:

Area of city zoned land (excluding NAS-Whidbey Island): 2,931.2 acres

Area of city zoned land covered by critical areas: 605.43 acres

Percentage of city zoned land covered by critical areas: $605.43 / 2,931.2 = 20.7\%$

Zone Categorization

Based on available zoning or comprehensive plan information, sort all parcels into the following groups:

Parcels zoned for single family home development (freestanding homes, townhomes, or other forms of individual lot development);

In Oak Harbor, this is the R-1 zone.

Parcels zoned for multi-family or mixed-use residential development (apartments, condominiums, mobile home parks, and other forms of multi-unit per parcel development);

In Oak Harbor, this is the R-2, R-3, R-4, and R-O zones.

Commercial and mixed-use commercial zones; and

In Oak Harbor, this is the C-1, C-3, C-4, C-5, CBD, CBD-1, and CBD-2 zones.

Industrial zones.

In Oak Harbor, this is the I and Maritime zones.

Constraints

Constraint or adjustment factor	Definition from <u>Island County CPPs</u>	Constraint
Critical areas constraint	A number representing the percentage of land (specific to each area analyzed) which is presumed to be constrained by critical areas, and therefore less likely to be available for development.	20.7%
Public purposes deduction	In RAIDs and UGAs, 15% of available land will be needed for public purposes.	15%
Seasonal/	Some dwelling units will not be available for residential occupancy, as they are used for	0.9%

Constraint or adjustment factor	Definition from <u>Island County CPPs</u>	Constraint
recreational adjustment factor	short term rentals (e.g., VRBOs), second homes, etc. A seasonal/recreational factor will be based on the most current census data but may be refined using local data.	
Market adjustment factor	none	Included within other adjustments
Vacancy rate adjustment	A reasonable factor for vacant units will be based on the most current census data but may be refined using local data.	5.89% (calculated from adding up vacant, for sale, and for rent units in Census Table H5)

The CPPs also required adjustments specific to each zone.

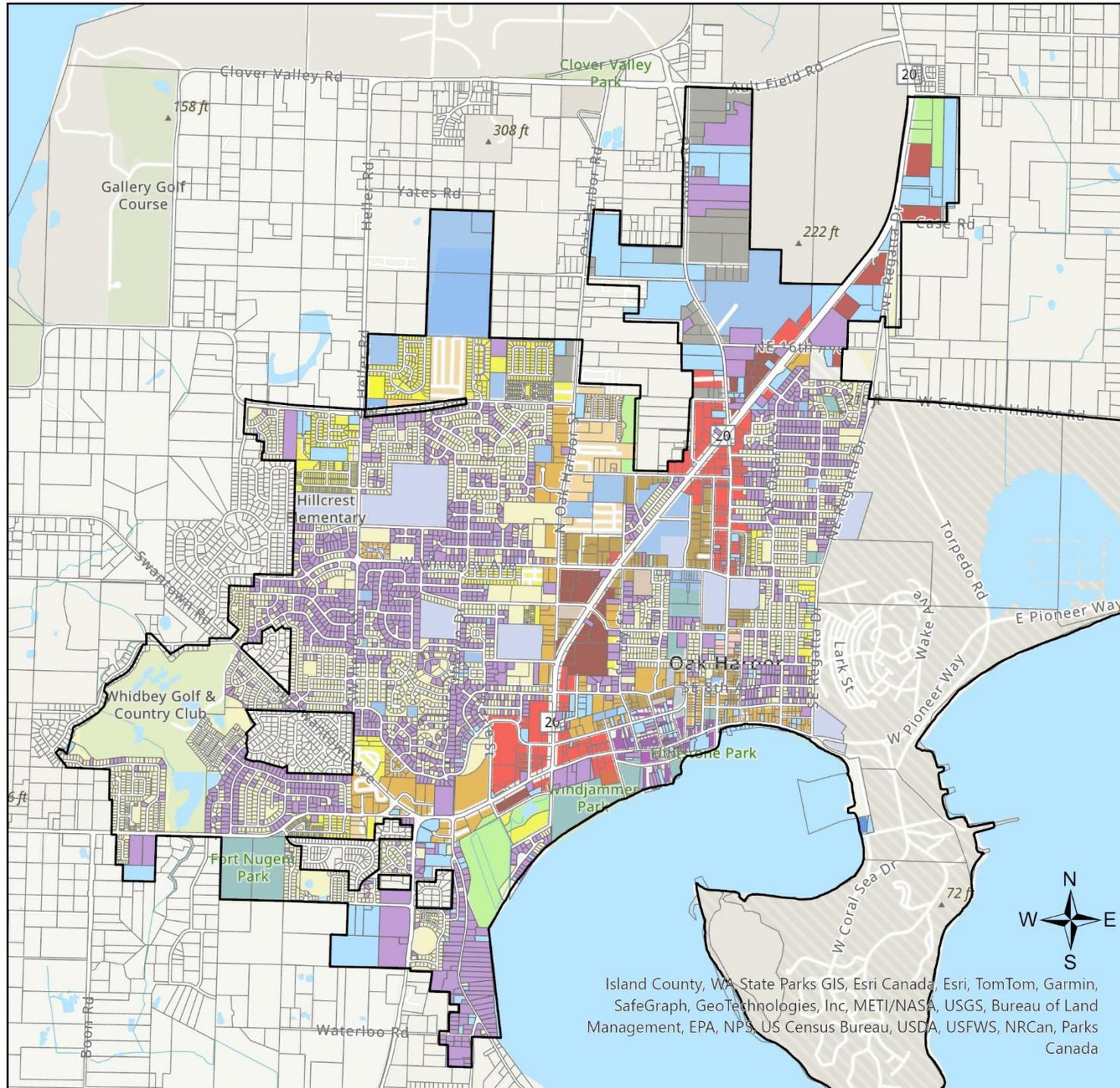
Constraint/adjustment factor	Applicable Zone	Adjustment % from Island County CPPs
Vacant parcels adjustment factor	All zones (This factor means that the County assumes 10% of all vacant parcels will not develop in the next 20 years)	10%
Partially Vacant Parcels adjustment factor	Single Family Zones	Between 0-90% based on lot size.
Re-Development Factor	Multifamily, Mixed-Use Residential, Mixed-Use Commercial, and Commercial Zones	50%



APPENDIX B

LCA MAPS

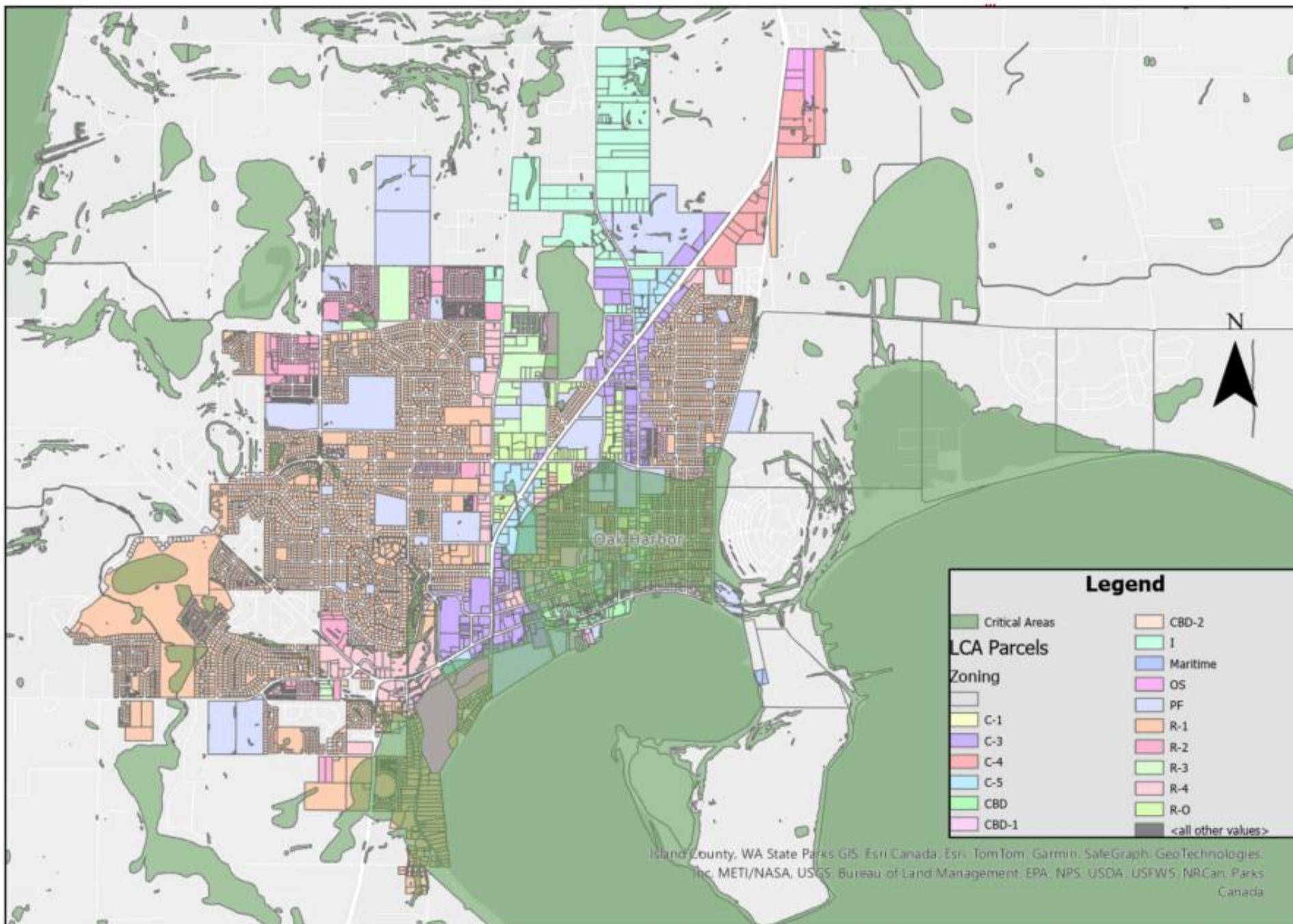
Oak Harbor LCA Map Max Density



Island County, WA State Parks GIS, Esri Canada, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, USFWS, NRCAN, Parks Canada

- City Limits
- LCA
 - Redevelopable
 - Vacant
 - Parcels
- Zoning
 - NAS
 - C-1
 - C-3
 - C-4
 - C-5
 - CBD
 - CBD-1
 - CBD-2
 - I
 - Maritime
 - OS
 - PF
 - R-1
 - R-2
 - R-3
 - R-4
 - R-O
- 0 1,500 3,000 Feet

LCA Parcels with Critical Areas





APPENDIX C
HOUSING AND PRELIMINARY EMPLOYMENT ALLOCATIONS

Housing For All Planning Tool (HAPT)

Housing Units by Income Level

Island County		Projection Year: 2045		Permanent Housing Needs by Income Level (% of Area Median Income)							Emergency Housing Needs (Temporary)	
		Population Target = 102,639		Total	0-30%		>30-50%	>50-80%	>80-100%	>100-120%		>120%
		Countywide Estimated Housing Supply (2020)		37,272	1,210	18	2,915	7,479	5,878	4,734	15,038	116
		Countywide Additional Units Needed (2020-2045)		8,717	986	838	1,775	1,512	717	683	2,206	265
		Sum of Allocation to Jurisdictions (from User Inputs)		8,717	986	838	1,775	1,512	717	683	2,206	266
User Input - % Share of County Population Growth. Values must sum to 100%				100.00%	<-- Sum of user inputs for jurisdiction shares of county future net housing need. If below 100%, increase shares. If above 100%, decrease shares.							
		* The location of 10 existing permanent supportive housing units within Island County is unknown. Therefore, they are not included in the jurisdiction table below.		Permanent Housing Needs by Income Level (% of Area Median Income)							Emergency Housing Needs (Temporary)	
				Total	0-30%		>30-50%	>50-80%	>80-100%	>100-120%	>120%	
27.39 %	Unincorporated Island County	Estimated Housing Supply (2020)		25,445	598	8	1,580	3,311	3,676	3,788	12,484	28
		Allocation Method A (2020-2045)		2,388	270	230	486	414	196	187	604	73
4.02 %	Coupeville town	Estimated Housing Supply (2020)		1,017	73	0	191	162	77	118	396	0
		Allocation Method A (2020-2045)		350	40	34	71	61	29	27	89	11
5.12 %	Langley city	Estimated Housing Supply (2020)		743	74	0	34	90	125	107	313	21
		Allocation Method A (2020-2045)		446	50	43	91	77	37	35	113	14
63.47 %	Oak Harbor city	Estimated Housing Supply (2020)		10,057	465	0	1,110	3,916	2,000	721	1,845	67
		Allocation Method A (2020-2045)		5,533	626	532	1,127	960	455	434	1,400	168



	A	B	C	D	E	F	G	H	I	J	K	L	M	N
1		2022 Jobs Total	% Share	Est. 2045 Total	Difference	Urban Rural Split								
2		17,640		20,348	2,708	Urban (City Limits & NMUGA)	Rural (UGA or County)							
3	Oak Harbor													
4	Military*	10,800		10,800	0	0	0		*NASWI current jobs of 10,800 includes 8,700 active duty and 2,100 civilians					
5	Non-Military	6,233	45.00%	7,452	1,219	1219	256							
6	Coupeville	2,484	15.00%	2,891	406	406	0							
7	Langley	587	5.00%	722	135	135	0		Population to Employment Ratio					
8	Island County	8,335	35.00%	9,283	948	95	597		PER Calculations		2.16408443	2.236530521		
9										2021	2045			
10									State population	7,766,925	9,533,435			
11									State employment	3,589,012	4,262,600			
12									Change	0.07244609				
13										2022	2045			
14									PER CALC	4.97165533	5.044101417			
15									IC population	87,700	102,639			
16									IC employment	17,640	20,348			
17									Change in 20 years	2,708				
18														
19									Notes:					
20									Baseline jobs data pulled from ESD 2022.					
21									Area specific baseline jobs data for 2022 was derived from Census 2021 data.					
22									Percentage shares were derived by starting with where existing jobs are located					
23									Freeland is 10% of County's overall share.					
24									OH Rural allocation is 30% of County's rural share.					

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Goals in BOLD text with grey background

Goal, Policy, Page Number, Theme/Sub Heading	Existing Policy (2016)	Proposed Policy Revision	Reasoning/Notes
LAND USE			
1, 31, Healthy Mix of Uses	Promote a healthy mix of uses	No recommended change.	
1, 1.a, 31, Healthy Mix of Uses	Encourage land use densities/intensities where services exist or are readily available.	No recommended change.	
1, 1.b, 31, Healthy Mix of Uses	Consider land use changes that are compatible with the character of its neighborhood.	Consider land use changes that are compatible with the character of its neighborhood.	The use of "neighborhood character" as a general term is discouraged unless it is clearly defined for each neighborhood through objective characteristics of size and scale. Otherwise, neighborhood character has the potential of disproportionately harming less affluent communities.
1, 1.c, 31, Healthy Mix of Uses	Promote neighborhood-scale satellite commercial centers to locate in areas away from SR 20.	No recommended change.	
1, 1.d, 31, Healthy Mix of Uses	Promote areas for open space and recreational opportunities within residential development.	Promote areas for open space within residential development to provide recreational opportunities within residential development and relief from climate induced impacts.	The policy can be expanded to acknowledge the relief open spaces can provide from the effects of climate change such as stating.
1, 1.e, 31, Healthy Mix of Uses	Encourage location of new schools within or adjacent to residential developments and in close proximity to parks.		Review with City and school district to identify more direct actions to promote this. Leave in place to indicate working with school district
1, 1.f, 31, Healthy Mix of Uses	Progress toward a form-based code to regulate the built environment and to foster predictable physical form rather than the separation of uses.	No recommended change.	
1, 1.g, 31, Healthy Mix of Uses	Promote a mix of uses and densities in new developments through the Planned Residential Development process.	Promote a mix of uses and densities in new developments through the use of various zoning tools including overlay zones, form-based codes etc.	Review with City.
1, 1.h, 31, Healthy Mix of Uses	Encourage private and public preservation of undeveloped open space.	Encourage private and public preservation of undeveloped open space and support climate resilience.	The policy can be expanded to acknowledge the relief open spaces can provide from the effects of climate change.
	New Policy	Foster higher-intensity land uses in mixed-use urban villages with transit corridors.	Building dense, affordable communities around public transportation as an environmental justice priority.

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Goal, Policy, Page Number, Theme/Sub Heading	Existing Policy (2016)	Proposed Policy Revision	Reasoning/Notes
	New Policy	Support the implementation of form-based codes where appropriate to better integrate higher-density development. a mix of uses including	Form-based codes can and should be intentionally used to facilitate greater density in urban areas (including UGAs) and to allow a mix of uses. They could then act as enablers of reductions of VMT and subsequent GHG emissions.
1, 1.i, 31, Healthy Mix of Uses	Designate areas newly incorporated into the UGA as special planning areas to: 1. Explore the best mix of land uses to serve the area and the city’s needs; 2. Work with property owners in the area to determine land use patterns and development scenarios; 3. Involve public participation.	No recommended change.	
2, 32, Health and Safety	Encourage land use patterns that promote health and safety. No recommended change.		
2, 2.a, 32, Land Use Changes	Promote land use changes that provide services closer to where people live.	No recommended change.	
2, 2.b, 32, Transportation	Incorporate alternate modes of transportation with development.	Incorporate alternate modes of transportation Provide opportunities for walking and biking, with development, reducing the amount of trips by car.	Added specificity to this policy to support consistency with the Transportation Element and provide support for complete streets designs established in code. Acknowledge that less vehicular trips contributes to larger environmental, climate, and equity-based goals. Transit was excluded but it is encouraged in the policy below on major corridors.
2, 2.c, 32, Density	Encourage higher land use intensities and densities along major transit corridors.	No recommended change.	
2, 2.d, 32, Roadways	Discourage long stretches of intersection-less roadway within the city.	Discourage long stretches of intersection-less roadway within the city to promote connectivity.	Added specificity to acknowledge the intent of the policy and provide consistency with the Transportation element. Connectivity also alleviates traffic and congestion, a common impact from development.
2, 2.e, 32, Accessibility	Locate neighborhood parks that are easily accessible to residents and community parks within the level of service distance established in the Parks Recreation and Open Space Plan.	No recommended change.	

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Goal, Policy, Page Number, Theme/Sub Heading	Existing Policy (2016)	Proposed Policy Revision	Reasoning/Notes
2, 2.g, 32, Interconnectivity	Promote interconnectedness between streets, parks, schools, trails, open spaces, and natural preserves.	No recommended change.	
2, 2.f, 32, Underserved Areas Open Space	Seek opportunities to establish parks and recreation opportunities in underserved residential areas.	Seek opportunities to establish parks and recreation opportunities in underserved residential areas, like the City's rec n'roll program.	Add specificity about programs.
2, 2.h, 32, Interconnectivity	Promote interconnectedness from residential areas to commercial areas, parks, and open spaces.	No recommended change.	
2, 2.i, 32, Design	Promote crime prevention through environmental and defensible space design.	No recommended change.	Review with City Develop standards for crime prevention through environmental and defensible space
2, 2.j, 32, Noise	Prohibit people-intensive and residential uses from locating in high noise and aircraft crash zones.	No recommended change.	
2, 2.k, 32, Noise	Require noise abatement construction standards based on noise level zones.	No recommended change.	
2, 2.l, 32, Development	Consider flexible standards to encourage redevelopment of underutilized lots.	No recommended change. with the incorporation of overlay zones	Review with City, is this being done currently.
2, 2.m, 32, Development	Limit the development around existing public water supplies to low- intensity uses.	No recommended change. Remanance of an old policy. since these refer to wells and all uses around it are on city services ther should be no groundwater impact.	Review with city
2, 2.n, 32, Development	Require developments to protect the aquifer recharge areas from contamination.	Require development to protect the aquifer recharge areas from contamination. promote groundwater recharge and prohibit development that may cause adverse impacts.	Update policy to include promoting groundwater recharge and prohibit development that may cause adverse impacts.
2, 2.o, 32, Multimodal	Promote a pedestrian scale environment by requiring buildings to locate close to street frontages in commercial, office and residential areas.	No recommended change.	
2, 2.p, 32, Development	Promote pedestrian amenities, where feasible, with development and redevelopment of land.	No recommended change.	
3, 33, Economy	Support a vibrant economy	No recommended change.	
3, 3.a, 33, Development	Facilitate mixed-use developments in all districts that allow commercial uses.	No recommended change.	
3, 3.b, 33, Development	Support efforts to encourage quality development and redevelopment in the Old Town area.	No recommended change.	

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Goal, Policy, Page Number, Theme/Sub Heading	Existing Policy (2016)	Proposed Policy Revision	Reasoning/Notes
3, 3.c, 33, Development	Support NAS Whidbey and its continued operation by discouraging: 1. Encroachment of incompatible uses; 2. Residential uses from locating north of NE 16th Avenue alignment; 3. Structures that are a hazard to flight navigation; 4. People-intensive uses in high noise areas and potential crash zones.	No recommended change.	
3, 3.d, 33, Noise	Require the disclosure of potential noise and accident-potential impacts to prospective buyers, renters, or lessees of property and structures in the city and UGA.	No recommended change.	Review with city, is this being done. YES
3, 3.e, 33, Development	Enhance and protect the waterfront as an asset and implement the Waterfront Redevelopment, Branding and Marketing Program.	Enhance and protect the waterfront while promoting higher-densities and amenities through subarea or redevelopment planning efforts. as an asset and implement the Waterfront Redevelopment, Branding and Marketing Program.	
3, 3.f, 33, Development	Promote upland developments adjacent to the marina.	No recommended change.	
3, 3.g, 33, Development	Consider flexible standards to encourage development and redevelopment along Midway Boulevard.	Consider Use overlay zoning to promote flexible standards along Midway Boulevard to encourage development and redevelopment. along Midway Boulevard.	Added specificity regarding how flexible zoning intends to be implemented.
3, 3.h, 33, Land Use Changes	Support the retention and expansion of industrial uses by utility services extensions and public infrastructure improvements.	No recommended change.	
3, 3.i, 33, Development	Support the development of business parks using, where appropriate, master planning processes to achieve campus type developments.	No recommended change.	
3, 3.j, 33, Development	Facilitate the growth of Skagit Valley College and its facilities.	No recommended change.	
3, 3.k, 33, Development	Accommodate mobile commercial enterprises such as food vendors, coffee trucks, etc. in the Old Town area, near schools and colleges, and along the waterfront and marina.	Accommodate mobile commercial enterprises such as food vendors, coffee trucks, etc. in the Old Town area, near schools and colleges, and along the waterfront and marina.	Remove - support in more areas of the city
3, 3.l, 33, Development	Promote context-sensitive and proportionately scaled signage.	No recommended change.	
3, 3.m, 33, Landscape	Consider landscape flexibility along commercial frontages for signs and storefront visibility.	No recommended change.	

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Goal, Policy, Page Number, Theme/Sub Heading	Existing Policy (2016)	Proposed Policy Revision	Reasoning/Notes
3, 3.n, 33, Development	Collaborate with the county to promote development practices that: 1. Encourage new development to occur within city limits; 2. Promote urban Oak Harbor development standards in the UGA.	No recommended change.	
3, 3.n, 33, Neighborhood	Support home occupations that: 1. Can operate inconspicuously and do not infringe on neighboring residents; 2. Do not infringe on or change the intent of the residential zone; 3. Have limited visitors and do not require additional parking.	No recommended change.	
4, 34, Housing	Promote a diverse and affordable housing stock	No recommended change.	
4, 4.a, 34, Development	Maintain a healthy amount of developable and redevelopable land in all residential land use categories.	No recommended change.	
4, 4.b, 34, Development	Support land use changes that accommodate higher density residential uses where services and utilities are available.	No recommended change.	
4, 4.c, 34, Development	Support the development of new, and the conversion of existing, residential structures for accessory dwelling units.	No recommended change.	
4, 4.d, 34, Development	Consider a mix of land uses when expanding urban growth areas.	No recommended change.	
4, 4.e, 34, Housing	Support flexible standards for developments that provide affordable housing.	No recommended change.	
4, 4.f, 34, Housing	Consider development incentives to include affordable housing within new developments.	No recommended change.	
4, 4.g, 34, Growth	Coordinate housing growth strategies with changes in school enrollment projections and NAS Whidbey expansions.	No recommended change.	
4, 4.h, 34, Housing	Support efforts to increase affordable housing in the City.	Support efforts to increase affordable housing in the City.	
	New Policy	Allow housing types for extremely low, low, and moderate income households.	This is related to the new requirements for emergency and permanent supportive housing for all cities. Previous policy mention low income households which excludes 0-30% AMI.

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Goal, Policy, Page Number, Theme/Sub Heading	Existing Policy (2016)	Proposed Policy Revision	Reasoning/Notes
5, 34, Environment	Respect the character of its natural and built environment	Respect the character of its natural and built environment	The use of "character" as a general term is discouraged unless it is clearly defined for each neighborhood through objective characteristics of size and scale. Otherwise, neighborhood character has the potential of disproportionately harming less affluent communities.
5, 5.a, 34, Environment	Consider flexible standards to protect Garry Oak trees and their habitat.		If the policy updates have been considered, reword policy to reflect status of Garry Oak retention policies.
5, 5.b, 34, Environment	Protect public view corridors : 1. When considering new developments; 2. From natural encroachments on public property.	Protect public view corridors : 1. When considering new developments; 2. From natural encroachments on public property.	The protection of views is difficult to measure and creates inconsistent application of development standards.
5, 5.c, 34, Environment	Consider flexible standards for building locations, heights, and landscaping plans to preserve views.	No recommended change.	
5, 5.d, 34, Development	Require, where appropriate, buffers and screening between new intensive uses and existing uses.	No recommended change.	
5, 5.e, 34, Environment	Promote the use of native vegetation, including Garry Oaks, for landscaping and buffers.	No recommended change.	
5, 5.f, 34, Environment	Promote parkways, street trees and landscaped boulevards with development proposals.		
5, 5.g, 34, Development Environment	Require design and construction standards for development to consider: 1. Protection of fish and wildlife habitat; 2. Geologically sensitive areas for construction; 3. Protecting critical aquifer recharge areas; 4. Protecting and enhancing the shoreline; 5. Frequently flooded areas.	Require design and construction standards for development to consider: 1. Protection of fish and wildlife habitat; 2. Geologically sensitive areas for construction; 3. Protecting critical aquifer recharge areas; 4. Protecting and enhancing the shoreline; 5. Frequently flooded areas.	This policy relates to other policies and city ordinances heavily covered in the Environment Element.
5, 5.h, 34-35, Environment	Require development to adhere to design guidelines and regulations that promotes a pedestrian friendly environment by: 1. Locating buildings closer to street frontages; 2. Encouraging visually interesting facades and people spaces.		Review with City.
5, 5.i, 35, Historical	Respect and acknowledge the role of historically and architecturally significant buildings in the community.	No recommended change.	

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Goal, Policy, Page Number, Theme/Sub Heading	Existing Policy (2016)	Proposed Policy Revision	Reasoning/Notes
5, 5.j, 35, Environment	Discourage premature land clearing ahead of development proposals.	Discourage premature land clearing ahead of development proposals to preserve existing native vegetation.	Revised the policy to explain the community resilience benefit.
5, 5.k, 35, Environment	Promote revegetation when retaining existing trees is not practical.	Promote Require revegetation when retaining existing trees is not practical.	Revised language to emphasize the importance of native vegetation retention for resilience and hazard mitigation.
5, 5.l, 35, Environment	Promote landscaping to achieve visual and noise buffers.	No recommended change.	
5, 5.m, 35, Development	Require buffers where land use intensities vary.	Require buffers where land use intensities vary.	Buffers between uses can be very limiting on economic development and housing opportunities within a city. The City is considering form-based codes which will regulate use through size and scale over location.
5, 5.n, 35, Development Environment	Require landscaping standards to efficiently screen for outdoor uses and storage areas.	No recommended change.	
5, 5.o, 35, Environment	Encourage industrial uses to incorporate landscaping, decorative fencing and native vegetation so that they are attractive and complementary to the community.	No recommended change.	
5, 5.p, 35, Utilities	Explore creative ways to blend in/camouflage utility towers and devices.	No recommended change.	
5, 5.q, 35, Utilities	Place utilities underground whenever feasible.	No recommended change.	
5, 5.r, 35, Open Space	Require common/public open spaces within developments to be accessible and visible.	No recommended change.	

HOUSING

1, 94, Affordability	Ensure that adequate opportunities exist for low and moderate-income families to obtain affordable housing.	Ensure that adequate opportunities exist for extremely low, low and moderate-income families, and to obtain affordable housing.	Adding details to help support changes to state law for allowing housing opportunities for extremely low-income populations.
1, 1.a, 94, Housing	Provide land use policies and development regulations that allow for a variety of housing types and residential life styles, to accommodate households in varying income ranges.	No recommended change.	
1, 1.b, 94, Design	Encourage alternative housing types from the standard single-family residences by using contemporary building and planning concepts, including apartments, condominiums, small lot, zero lot line, attached patio, townhouse, and manufactured housing.	Encourage alternative housing types from the standard single-family residences by using contemporary building and planning concepts, including apartments, accessory dwelling units , condominiums, small lot, zero lot line, attached patio, townhouse, and manufactured housing.	Addressing new state requirements for accessory dwelling units and allowing increased housing options to improve affordability.

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Goal, Policy, Page Number, Theme/Sub Heading	Existing Policy (2016)	Proposed Policy Revision	Reasoning/Notes
1, 1.c, 94, Affordability	Promote the inclusion of affordable housing developments through incentives, density bonuses, and flexible development regulations.	No recommended change.	
1, 1.d, 94, Affordability	Promote the inclusion of subsidized units throughout the community to diversify neighborhoods.	No recommended change.	
1, 1.e, 94, Affordability Transportation	Promote the location of affordable housing in proximity to transit routes to ensure the most efficient and cost-effective use of public transportation.	No recommended change.	
1, 1.f, 94, Housing	Support efforts to develop self-help housing programs.	No recommended change.	Does the City have a department that can take on the administration of housing programs like this? If so, that should be identified in the Housing Element.
1, 1.g, 94, Affordability	Allow provisions in development regulations for inclusionary affordable housing and density bonus performance standards.	No recommended change.	
1, 1.h, 94, Development	Allow for the development and preservation of manufactured homes.	No recommended change.	
	New Policy	Allow housing opportunities for extremely low-income including shelters, emergency, transitional, and permanent supportive housing.	Addressing new state requirements for providing housing of all incomes including those earning 0-30% AMI, defined as extremely low-income populations.
2, 95, Housing	Promote housing opportunities for special needs population.		
2, 2.a, 95, Accommodation	Accommodate land uses and housing that provides for the needs of the elderly, disabled, and infirm.	No recommended change.	
2, 2.b, 95, Development	Support the Island County Housing Authority and Opportunity Council to address siting and development of housing for special needs populations.	No recommended change.	
2, 2.c, 95, Affordable Housing Development	Work cooperatively with social service providers, local churches, other organizations and individuals, to address the needs of homeless persons by establishing options for short-term homeless shelters and encampments.	No recommended change.	
2, 2.d, 95, Housing	Allow for the development of assisted housing in appropriate locations.	No recommended change.	
2, 2.e, 95, Housing	Ensure compliance with State and National Standards for group homes and family day care facilities.	No recommended change.	

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Goal, Policy, Page Number, Theme/Sub Heading	Existing Policy (2016)	Proposed Policy Revision	Reasoning/Notes
3, 95, Land	Identify and provide sufficient and appropriate land for housing.	No recommended change.	
3, 3.a, 95, Land Development	Monitor inventory of developable land, to ensure adequate land is available for projected housing needs.	No recommended change.	
3, 3.b, 95, Development	Allow for a range of densities to ensure maximum choice in housing options.	Allow for a range of densities to ensure maximum choice in housing options.	
3, 3.c, 95, Development	Consider incentives and flexibility in development standards to promote mixed uses that include housing in commercial development.	No recommended change.	
	New Goal	Use partnerships and programs to increase the opportunity for affordable housing and housing preservation.	This came from discussions from the first OakPAC Meeting about creative housing solutions.
	New Policy	Work with affordable housing providers to periodically assess existing, financial, permitting, and environmental barriers.	Keeping an ongoing discussion with affordable housing providers will be important as the city plans for growth.
	New Policy	Periodically assess current housing incentives and their success in producing or preserving housing stocks, especially incentives to address affordable housing gaps.	This came from discussions from the first OakPAC Meeting about creative housing solutions and also help address state requirements to plan for and accommodate housing for all income levels.
	New Policy	Explore opportunities for managing rentals or short-term rentals to prevent loss of housing stock to all income levels.	The City should continue to understand the changing market around housing properties that may be kept vacant for short-term rentals or may be mismanaged, preventing housing from providing long-term housing.
	New Goal	Support new housing opportunities, through regulations, programs, and partnerships, that enhance housing equity and promote environmental justice.	This both addresses state requirements for housing and requirements to address climate resiliency. It is required to reverse racially disparate impacts and address environmental justice, especially those that may be impacted by climate change.
	New Policy	When planning for housing types affordable to extremely low or low-income populations analyzing future projected impacts from climate change.	As this periodic update requires increased housing planning initiatives and increased climate initiatives, the City should take measures to ensure that housing types affordable to low-incomes are not sited in areas highly vulnerable to climate change.

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Goal, Policy, Page Number, Theme/Sub Heading	Existing Policy (2016)	Proposed Policy Revision	Reasoning/Notes
	New Policy	Include measures in economic growth strategies and economic development and redevelopment plans that reduce probability of displacement of existing communities, especially those vulnerable to climate-exacerbated hazards.	As the City plans for economic development and mitigating climate change, include analysis on the potential displacement of existing populations.
4, 95, Neighborhood Community	Preserve, maintain and improve the value of existing neighborhoods.	Preserve, maintain and improve the value of existing neighborhoods.	
4, 4.a, 95, Code	Enforce existing housing codes and maintain code enforcement efforts in residential areas.	No recommended change.	
4, 4.b, 95, Infrastructure	Invest in existing infrastructure as a means to encourage private reinvestments.	No recommended change.	
4, 4.c, 95, Development	Encourage redevelopment and infill of underdeveloped residential properties.	No recommended change.	Review this with the City, what ways is redevelopment or infill being encouraged?
URBAN GROWTH AREA			
1, 140, Growth	Support and encourage urban uses and densities to occur within the UGA boundaries.	Support and encourage Plan for urban uses and densities to occur within the UGA boundaries.	This language is more consistent with the Countywide Planning Policies better identifies the City's role in assigning urban densities in the City boundary (wtihin the UGA).
1, 1.a, 140, Growth	Include urban density growth, and municipal public facilities serving that growth, only within the UGA boundary, as mandated by the Washington State Growth Management Act.	No recommended change.	
1, 1.b, 140, Development	Ensure that sufficient land in the UGA is available to provide reasonable development opportunities to accommodate twenty years of population and employment growth.	No recommended change. Coordinate with the County to ensure	
1, 1.c, 140, Development	Progress toward eliminating unincorporated enclaves in order to provide for the most efficient provision of urban services within the UGA.	No recommended change. Coordinate with the County to progress	
2, 142, Growth	Engage the County cooperatively in determining expansions to the UGA boundary in accordance with the County Wide Planning Policies.	No recommended change.	Review with City No changes
2, 2.a, 142, UGA Boundary	The UGA boundary expansion may be activated by a proposal from either the City or County. Both governments must agree on the boundary as required by the Washington State Growth Management Act.	No recommended change. The City and the County through an Interlocal Agreement shall study the UGA jointly and include proposals for expansion	Review with City

Red Text = New Language Proposed, Strikethrough = Language to be removed

Goals in BOLD text with grey background

Goal, Policy, Page Number, Theme/Sub Heading	Existing Policy (2016)	Proposed Policy Revision	Reasoning/Notes
2, 2.b, 142, Development	Base proposed expansion of the UGA on the percentage of developable land existing within the UGA as determined by the City Council as well as changes in the city or amendments to the Comprehensive Plan.	No recommended change. Base proposed expansions based on the Lands Capacity Analysis and the Countywide Planning Policies	Review with City
3, 142, Land Use	The City and County shall adopt inter-jurisdictional cooperation policies regarding land within and surrounding the UGA.	change inter-jurisdictional cooperation policy with Interlocal Agreement	Review with City
3, 3.a, 142, Boundary Planning	Joint planning should identify, in advance, the priority areas of future boundary expansion.	Move to previous goal	Review with City
3, 3.b, 142, Growth	Ensure regional growth capacity issues are a part of the consideration of the boundary expansion by the City and County.	Move to previous goal	Review with City
3, 3.c, 142, Planning	Continue to use and amend as necessary the Interlocal Agreement between Oak Harbor and Island County as the primary means of implementing compatible land use policies, procedures, public facility planning and development standards and regulations within the UGA.	No Change	Review with City
3, 3.d, 142, Planning	Plan development within the UGA for future annexation to the City by ensuring uses are compatible with the adopted Comprehensive Plan.	Through Interlocal Agreements with the County plan for development in the UGA to be limited until annexation	Review with City
3, 3.e, 142, Planning	A portion of Ault Field should be included in the Oak Harbor UGA in the event the base is closed, lands are surpluses, or the base's mission is changed and joint use becomes possible. The City shall coordinate with the County, the Department of Defense and other agencies involved to develop a Master Plan for reuse of the air station should any of these events occur.	The City should be open to have Ault Field included ... No Changes	Review with City
4, 4.a, 143, Development	Land to be annexed should include only areas seen as logical extensions of the City, located adjacent to existing urban development.	No Changes	Review with City
4, 143, Development	Annexations to the City will occur in compliance with the Washington State Growth Management Act and the following policies.		Review with City
4, 4.b, 143, Development	The City should avoid annexations that would result in unincorporated enclaves within the UGA.	No Changes	Review with City

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Goals in BOLD text with grey background

Goal, Policy, Page Number, Theme/Sub Heading	Existing Policy (2016)	Proposed Policy Revision	Reasoning/Notes
4, 4.c, 143, Development	Annexations to the City should be based on evidence that public facilities and service capacities already exist or are planned for and can be efficiently, economically, and practically provided by either public or private sources.	No Changes	Review with City
4, 4.d, 143, Development	Annexations should not diminish the present LOS or create an excessive financial burden to existing and prospective property owners in the City.	No Changes	Review with City
4, 4.e, 144, Development	Ensure property owners within an annexing area are aware of foreseeable obligations or requirements that may be imposed upon them by the City at the time of annexation.	No Changes	Review with City
4, 4.f, 144, Development	Require existing buildings, within annexed areas, to meet the City's fire and safety requirements.	Prior to annexation	Review with City
4, 4.g, 144, Fire Development	Assure that the City's fire rating is not reduced because of annexation.	No Changes	Review with City
4, 4.h, 144, Policing Development	Maintain the existing level of police service when annexing new areas.	No Changes	Review with City
4, 4.i, 144, Development	Annexation proposals should describe the method and level of funding for capital facilities needed to serve the annexed area.	Annexations should be considered where infrastructure is already available or funding for capital facilities is programmed	Review with City
4, 4.j, 144, Development	Proponents of annexation in developed or partially developed areas should pay their fair share of the costs of urban services and public improvements required to meet the City's LOS standards.	No recommended change.	
4, 4.k, 145, Economy	The City may require the preparation of a fiscal impact study which addresses long and short-term economic impacts to the City.	No recommended change.	
4, 4.l, 145, Development	Annex, when possible, areas of sufficient size that square off City boundaries and enhance circulation.	Annex, when possible, areas of sufficient size that square off City boundaries and enhance circulation.	Review with City No Changes
4, 4.m, 145, Development	Proposed annexations shall not result in the long-term reduction of the City's established LOS standards.	No recommended change.	
5, 145, Neighborhoods Development	New neighborhoods annexed into the City should contribute in a positive manner to sustain and enhance the quality of life for all Whidbey Island citizens while promoting a strong sense of place for Oak Harbor.		Review with City

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Goals in BOLD text with grey background

Goal, Policy, Page Number, Theme/Sub Heading	Existing Policy (2016)	Proposed Policy Revision	Reasoning/Notes
5, 5.a, 145, Annexation Transportation	Annexation agreements should include a preliminary plan for a transportation network that emphasizes connections to existing neighborhoods, streets and pedestrian facilities.	No Changes	Review with City
5, 5.b, 145, Annexation Development	Where topography allows, new annexation areas should develop in the traditional lot and block grid pattern that typified early Oak Harbor development and enhances the provision of public facilities and services.	No Changes	Review with City
5, 5.c, 145, Annexation Green Space	The City should consider the desirability of acquiring potential new public facilities, such as trails, parks or open space lands, during the annexation review process with the cooperation of the petitioners.	remove "the desirability of"	Review with City
5, 5.d, 145, Annexation	In annexation requests where the surrounding land uses could be significantly affected by the potential land uses in the annexing area, the City should require a greenbelt designation of an appropriate width to ameliorate the negative impacts.	Remove - The City has no ability or authority to establish greenbelts outside the City.	Review with City
5, 5.e, 145, Annexation	The City should adopt standards that support the Comprehensive Plan annexation policies.		Review with City

From: noreply@civicplus.com
To: [Magi Aguilar](#); [Cac Kamak](#)
Subject: Online Form Submission #81475 for Comprehensive plan comments, suggestions, and ideas
Date: Thursday, November 6, 2025 4:37:56 PM

Caution! This message was sent from outside your organization.

[Report](#)

Comprehensive plan comments, suggestions, and ideas

How do you envision the City of Oak Harbor? What's important for you to see in Oak Harbor in the next 20 years?

The City of Oak Harbor is undertaking a major update to its Comprehensive Plan. The process will update the Plan to meet the applicable State regulations for housing, infrastructure, and other requirements.

Oak Harbor and its UGA have been allocated 60+% of Island County's growth over the next 20 years. If you have thoughts and comments on how you would like these factors to shape Oak Harbor's future please fill out the form below.

Your input and participation is an integral part of the update process. If you would like to follow the update process, please follow discussions at Oak Harbor's Planning Commission and City Council Workshops.

First Name	Michael
Last Name	Szemplinski
Email Address	michael.szemplinski@gmail.com
Do you reside within city limits?	yes
Type your comments, suggestions, and ideas regarding the Comprehensive Plan	<p>Keep applying Strong Town housing ready policies:</p> <p>Policy #1: Allow Single-Family Home Conversion to Duplex or Triplex, by Right</p> <p>Policy #2: Permit Backyard Cottages in All Residential Zones</p> <p>Policy #3: Legalize Starter Homes in All Residential Zones</p> <p>Policy #4: Eliminate Minimum Lot Size Requirements in Existing Neighborhoods</p> <p>Policy #5: Repeal Parking Mandates for Housing</p> <p>Policy #6: Streamline the approval process</p>

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Planning Commission

12/09/2025

■ Comprehensive Plan Policy Review

■ Preliminary Draft Review

- Seeking broad feedback and general directions
- Comments will help shape the “Draft” Comprehensive Plan

■ Review Element schedule

- September - Urban Design, Transportation, Utilities, Environment, Capital Facilities
- October - Parks and Recreation, Economic Development, Government Services, Climate Resiliency
- December - Land Use, Housing, Urban Growth Area

■ Determination of Significance (DS)

- EIS
 - Expanded version of the SEPA
 - Scoping in Jan/Feb 2026
 - Three Alt with a preferred alternative

**2025
UPDATE**

12/09/2025

■ Comprehensive Plan Policy Review

■ Policy Document

- Goal, Policy, Page Numbers, Theme/Sub-Heading
- Existing Policy
- Proposed Policy Revision
- Reasoning Notes

■ Changes address

- Equity
- Climate Resilience
- Environmental Justice
- Compliance with state laws
- Promote sustainable development
- Improve community well-being

**2025
UPDATE**

12/09/2025

■ Land Use Element

- **Neighborhood Character:** Revised language to discourage the use of "neighborhood character" unless clearly defined to avoid potential harm to less affluent communities.
- **Open Space:** Expanded policies to include climate resilience benefits of open spaces.
- **Zoning Tools:** Broadened the scope of zoning tools to include overlay zones and form-based codes for promoting mixed-use developments.
- **Climate Resilience:** Added support for climate resilience in policies related to open space preservation.
- **Alternate Modes:** Added specificity to promote walking and biking to reduce car trips and align with complete streets designs.
- **Road Connectivity:** Expanded policy to emphasize connectivity and alleviate traffic congestion.

**2025
UPDATE**

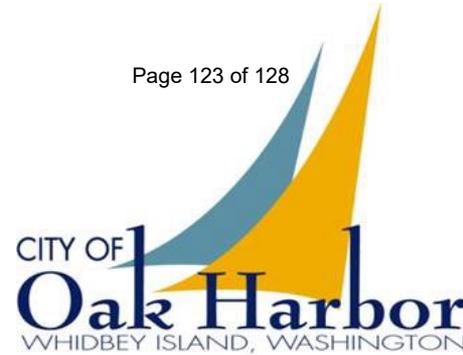
12/09/2025

■ Land Use Element

- **Native Vegetation:** Revised policies to emphasize the importance of retaining native vegetation and promoting revegetation for resilience and hazard mitigation.
- **Premature Land Clearing:** Expanded policy to include preserving native vegetation during development.
- **Waterfront Development:** Revised policy to promote higher densities and amenities through subarea or redevelopment planning efforts.
- **Flexible Zoning:** Added specificity to encourage development and redevelopment along Midway Boulevard using overlay zoning.

**2025
UPDATE**

12/09/2025



■ Housing

- **Extremely Low-Income Housing:** Added policies to allow housing types for extremely low-income households, including shelters, emergency, transitional, and permanent supportive housing.
- **Accessory Dwelling Units:** Included accessory dwelling units in alternative housing types to improve affordability.
- **Affordable Housing:** Introduced new policies to assess barriers to affordable housing, evaluate housing incentives, and manage short-term rentals to prevent loss of housing stock.
- **Climate Resilience:** Added policies to ensure affordable housing is not located in areas vulnerable to climate change impacts.

**2025
UPDATE**

12/09/2025

■ Urban Growth Area (UGA)

- UGA Planning: Updated language to align with Countywide Planning Policies and emphasize the City's role in assigning urban densities within the UGA.
- Annexation: Added language to ensure annexations are logical extensions of the city, avoid unincorporated enclaves, and maintain service levels.
- Greenbelts: Removed the policy requiring greenbelt designations, citing lack of authority to establish them outside city limits.

**2025
UPDATE**

12/09/2025

■ New Goals and Policies

- **Affordable Housing:** Introduced goals and policies to increase affordable housing opportunities, preserve housing stock, and address barriers to housing development.
- **Environmental Justice:** Added goals to promote housing equity and environmental justice, particularly for vulnerable populations affected by climate change.
- **Displacement Prevention:** Proposed measures in economic growth strategies to reduce displacement of existing communities.

**2025
UPDATE**

12/09/2025

QUESTIONS/COMMENTS

From: noreply@civicplus.com
To: [Magi Aguilar](#); [Cac Kamak](#)
Subject: Online Form Submission #79450 for Comprehensive plan comments, suggestions, and ideas
Date: Sunday, October 12, 2025 3:43:38 PM

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[Report](#)

Comprehensive plan comments, suggestions, and ideas

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Your input and participation is an integral part of the update process. If you would like to follow the update process, please follow discussions at Oak Harbor's Planning Commission and City Council Workshops.

First Name Steven

Last Name Lange

Email Address 2013klr650dude@gmail.com

Do you reside within city limits? no

Type your comments, suggestions, and ideas regarding the Comprehensive Plan

On behalf of Ron Woolworth of Vintage Investments, owner of Parcel Numbers 491248 and 708853, we respectfully request that these parcels are taken into consideration for future annexation into the City of Oak Harbor. There are currently letters of record with the Planning Director. The property is already included in the water service area of Oak Harbor and has participated in the pump station costs for Homestead Development at 16 homes. Please include, both Ron Woolworth and myself in any future stake holder meetings and or outreach.

Thank you for your time.
Steven Lange

360.420.9921

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