



Executive Summary – Planning Commission

Issue Title: 2024 Comprehensive Plan Remand and Certification
Meeting Date: November 18, 2025
Time Required: 30 Minutes
Department: Department of Community Development (DCD)
Attendees: Keri Sallee, Long Range Planner

Action Requested At This Meeting: Review draft amendments to goals, policies and strategies in the Land Use, Housing and Transportation elements of the Comprehensive Plan, and provide feedback to staff. The draft amendments are in Attachment A.

Background:

On August 8, 2025, the Growth Management Hearings Board (GMHB) issued a Final Decision and Order (Attachment B) finding that the County's 2024 Comprehensive Plan was noncompliant with the Growth Management Act (GMA), RCW 36.70A, in several respects. The GMHB identified the following deficiencies:

- **Housing.** The residential land capacity analysis (LCA) for the Housing element overstated redevelopment capacity, excluded most residential potential in mixed-use zones, and failed to demonstrate sufficient housing unit capacity for all income groups, particularly extremely low to moderate housing (0-80% AMI).
- **Wildfire Risk and Planning.** The Land Use element did not adequately address wildfire risk and emergency evacuation. The Plan did not adopt recognized wildfire planning frameworks, such as the International Wildland Urban Interface code (IWUIC) or Firewise USA standards, or equivalent alternatives. Provisions were not made for multimodal evacuation routes.

On August 28, 2025, the Puget Sound Regional Council (PSRC) issued its Certification Report on the 2024 Comprehensive Plan (Attachment C). The PSRC identified the following deficiencies:

- **Housing.** The PSRC concurred with the GMHB's finding that the Comprehensive Plan showed a housing deficit for all income segments, particularly below 80% AMI.
- **Employment Capacity.** The Land Use element showed a countywide employment capacity deficit, particularly in the Silverdale regional center and other unincorporated UGAs.

- Air Quality. The Transportation element lacked a required policy ensuring compliance with federal and state air quality standards and reduction of greenhouse gas emissions.

The GMHB requires the comp plan deficiencies identified in its Order to be resolved and adopted by ordinance, no later than February 4, 2026. The PSRC's identified deficiencies will be addressed concurrently.

The draft amendments were released to the public and a SEPA Determination of Nonsignificance (DNS) was published on November 10, 2025. Comments received on the draft amendments or the SEPA DNS by December 1, 2025 will be shared with the Planning Commission and Board of County Commissioners.

Summary of Corrective Actions:

- Wildfire Risk and Planning (Land Use and Transportation elements)

Revisions to the Land Use and Transportation elements incorporate new goals, policies and strategies addressing wildfire evacuation, risk reduction, and interagency coordination. Because emergencies can be of varying types (wildfire, earthquake, industrial accident, etc) and in different locations throughout the County, fixed evacuation routes including for wildfires cannot be mapped in the Comprehensive Plan. However, the draft policies integrate wildfire risk mapping, evacuation route planning, and coordination with fire districts and the Department of Emergency Management for appropriate reactive evacuation measures to ensure public safety. The revisions respond to the GMHB's findings of inadequate policy direction for wildfire mitigation in rural and wildland-urban interface (WUI) areas.

- Air Quality (Transportation element)

The Transportation element has been revised to include a new goal and associated policies and strategies that affirm the County's commitment to meeting state and federal air quality standards and reducing greenhouse gas emissions. This new language is consistent with and supportive of air quality language in the Climate Change element.

- Housing Capacity (Table 3 Land Use element, Tables 10 and 11 Housing element, and Appendix A Housing Element Technical Analysis)

The Land Use element has revised policies and new strategies to ensure housing capacity for all economic segments and for overall housing targets. Strategies include addressing housing deficiencies through reasonable measures such as rezoning, zone density adjustments, or development regulation amendments.

In the supporting Land Capacity Analysis housing calculations (Attachment D), the right-of-way reduction factor for infill, underutilized and urban redevelopment properties was

reduced from 20% to 5%, to reflect that most of these properties are already served by established roads and utilities. The updated analysis identifies a 7% increase in total residential capacity, including 294 detached single-family units and 1,070 multi-family units. The resulting updated capacities are shown in Tables 10 and 11.

- Employment Capacity (Table 4 Land Use Element)

The Land Capacity Analysis methodology (for employment capacity (Attachment E) was revised to better reflect current conditions and the Preferred Alternative as adopted in the Comprehensive Plan. The revised methodology improves overall employment capacity and capacity within several UGAs, but does not fully meet targets for the Kingston, Poulsbo, and Port Orchard UGAs. The PSRC has acknowledged this work, and has agreed to accept the County's substantial progress while the County continues to work on resolving the remaining employment deficiencies in its near-term work plan.

Next Steps:

Planning Commission public hearing – December 2, 2025

Attachments:

- A. Draft Amendments to the Comprehensive Plan
- B. GMHB Final Decision and Order
- C. PSRC Certification Report
- D. Land Capacity Analysis Revisions - Housing
- E. Land Capacity Analysis Revisions - Employment