



ISLAND COUNTY PLANNING & COMMUNITY DEVELOPMENT

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Island County 2045 – Comprehensive Plan Periodic Update SEPA¹ Expanded Environmental Checklist

Purpose of checklist

Governmental agencies use this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization, or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

Instructions for applicants

This environmental checklist asks you to describe some basic information about your proposal. Please answer each question accurately and carefully, to the best of your knowledge. You may need to consult with an agency specialist or private consultant for some questions. **You may use “not applicable” or “does not apply” only when you can explain why it does not apply and not when the answer is unknown.** You may also attach or incorporate by reference additional studies reports. Complete and accurate answers to these questions often avoid delays with the SEPA process as well as later in the decision-making process.

The checklist questions apply to **all parts of your proposal**, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

Instructions for lead agencies

Please adjust the format of this template as needed. Additional information may be necessary to evaluate the existing environment, all interrelated aspects of the proposal and an analysis of adverse impacts. The checklist is considered the first but not necessarily the only source of information needed to make an adequate threshold determination. Once a threshold determination is made, the lead agency is responsible for the completeness and accuracy of the checklist and other supporting documents.

¹ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/Checklist-guidance>

Use of checklist for nonproject proposals

For nonproject proposals (such as ordinances, regulations, plans and programs), complete the applicable parts of sections A and B, plus the Supplemental Sheet for Nonproject Actions (Part D). Please completely answer all questions that apply and note that the words "project," "applicant," and "property or site" should be read as "proposal," "proponent," and "affected geographic area," respectively. The lead agency may exclude (for non-projects) questions in "Part B: Environmental Elements" that do not contribute meaningfully to the analysis of the proposal.

A. Background

[Find help answering background questions²](#)

1. Name of proposed project, if applicable:

Island County 2045 Comprehensive Plan Periodic Update

2. Name of applicant:

Island County, Department of Planning & Community Development

3. Address and phone number of applicant and contact person:

Island County Department Planning & Community Development
1 NE 7th St
Coupeville, WA 98239

Contact: Mike Podowski, Long Range Planner
(360) 678-2343
m.podowski@islandcountywa.gov

4. Date checklist prepared:

December 2, 2025

5. Agency requesting checklist:

Island County Planning and Community Development

6. Proposed timing of schedule (including phasing, if applicable):

The Department of Planning and Community Development is expected to make a recommendation on the updates to the draft comprehensive Plan, Clinton Subarea Plan, and development regulation changes to the Board of County Commissioners in fall/winter, 2025. The Board's action on the Comprehensive Plan is anticipated to occur by Spring, 2026.

7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.

The Comprehensive Plan and development regulations are reviewed and amended on an ongoing basis to reflect changing conditions and requests from members of the public and the Board of Commissioners. The Plan is implemented through Island County Code (ICC), and amendments to

² <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-A-Background>

the Code are anticipated based on Plan guidance. Future actions, not addressed in this checklist, will be subject to independent SEPA review and threshold determinations.

8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.

Island County prepared this expanded SEPA environmental checklist that incorporates by reference a number of informative documents including an environmental impact statement (EIS) for previous versions of the Island County Comprehensive Plan that considered impacts associated with comprehensive planning and implementation for a range of population projections that the County still has not reached. These were presented in the Draft and Supplemental EISs and other documents listed below. The highest growth estimate in the EIS assessed impacts associated with an overall County population of 118,800. However, growth has not occurred to the degree expected, and the County has since adopted a 2045 population projection of 99,202, which is considerably less. For a comparison of population estimates used in assessing environmental impacts, please see the response to question 8i under Land Use and Shorelines in *Section B8. Environmental Elements* of this checklist.

The Island County Department of Planning and Community Development has reviewed the EIS and has found that it adequately informs decision makers on the impacts associated with planning for growth within the County through 2045. Impacts in certain areas are likely over-stated, as the County is now planning for a lower population projection. The EIS contains useful information and should be used to inform the County's action by formally incorporating it along with the documents listed below.

Several documents have been useful in informing the Planning Department's SEPA review. These include:

1. Countywide Planning Policies, DNS (February 6, 2025)
2. Land Capacity Analysis, Island County Planning and Community Development – a report on the capacity in Island County for state population allocations, including the methodology and assumptions used in the analysis and results (December 2025)
3. Final EIS (FEIS) for the Island County Comprehensive Plan (September 18, 1998)
4. Supplemental Draft EIS (SEIS) for Island County Comprehensive Plan (July 14, 1998)
5. Draft EIS (DEIS) for the Draft Island County Comprehensive Plan - Policy and Land Use Element (November 12, 1996)
6. Preliminary Draft EIS (DEIS) for the Island County Comprehensive Plan (April 26, 1994)

9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.

No pending applications or proposals are directly affected by the Comprehensive Plan Update.

10. List any government approvals or permits that will be needed for your proposal, if known.

Approval by the Island County Board of County Commissioners is required for adoption of the proposal by ordinance(s). Washington State Department of Commerce 60-day review is also required. Individual development projects that would be subject to the proposed ordinance(s)

would also be subject to all applicable federal, state and local permitting and licensing requirements.

11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)

The proposal in this checklist is described collectively as the Comprehensive Plan Update and includes the following:

Island County is conducting a periodic update of its comprehensive plan as required by the state Growth Management Act (Revised Code of Washington (RCW), Chapter 36.70A). Updates are proposed to the currently adopted 2016 Comprehensive Plan goals and policies. Updates to Comprehensive Plan Elements with revised goals and policies include:

1. Introduction Chapter – New Vision and Values
2. Land Use
3. Housing
4. Natural Resources
5. Capital Facilities and Utilities
6. Parks, Recreation, and Open Space
7. Climate (new)
8. Economic Development
9. Transportation

Elements that are not being updated during this comprehensive plan update include the Historic and Shoreline Elements, and the Freeland Subarea Plan.

A Clinton Subarea Plan is being added to the Land Use Element of the Comprehensive Plan.

Various updates to development regulations are also proposed in response to state legislation. For example, during the 2023 session, the State legislature passed House Bill (HB) 1337, which requires Island County and other cities and counties planning under the Growth Management Act (GMA) to meet certain requirements when regulating accessory dwelling units (ADUs).

In addition, during the 2021 session, the State legislature passed HB 1220, which mandates that jurisdictions plan for and accommodate housing at all income levels. Under HB 1220, Island County is required to evaluate whether they have sufficient land capacity to allow for the housing types and amounts identified at all income levels. If there is insufficient capacity, the jurisdiction must identify and implement zoning changes and land use allowances that provide enough capacity upon adoption of the comprehensive plan.

The code change proposal is outlined below and summarized in more detail in the Land Use and Housing Elements of this checklist.

Outline of Proposed Changes to Development Regulations to Support Housing

Regulation Topic	High-level Summary of Proposed Code Changes
Accessory Dwelling Unit (ADU) Proposal	<ul style="list-style-type: none"> In Urban Growth Areas (UGAs) and Rural Residential (RR) zones allow 2 ADUs per lot; a second ADU is allowed in Rural (R) and other zones if affordable; allow sale as condominiums in all zones. Allow 25 permits/year for affordable rental ADUs (in addition to existing limit of 35/year, and exclude RR zones from the annual limit).
Code Changes in Mixed-use LAMIRDs*	Allow density up to 12 dwelling units per acre; 8 units per building, 0.5 acre lots, and a 40 foot height limit.
Updates to Rural Cluster Housing Provisions**	Add a new Rural Cluster code for affordable housing in rural areas that allows up to 12 dwelling units per acre with affordable housing, and update allowance for market-rate cluster development.
Co-living Housing	Add new code to explicitly allow co-living housing on residential lots.
Recreational Vehicles (RVs) on single-family lots	Allow for 1 year with water/septic hookups and life/safety inspections.
Unit Lot Subdivision (ULS)	Allows ownership of a variety of housing types including the land under the housing.
Other zoning changes	Prohibit mini-storage, outdoor storage, and warehouses in Freeland UGA (Light Industrial Zone), and mixed-use LAMIRDs (Rural Center, Rural Village, and Camano Gateway Village zones).

*Limited Areas of More Intensive Rural Development (LAMIRDs) were previously called Rural Areas of Intensive Development (RAIDs) in the Island County Code (ICC).

**Cluster Housing was previously called Planned Residential Development in the ICC.

Included in the proposal is a development moratorium that established, by Ordinance C-29-25 PLG-003-25, a twelve month period, from April 15, 2025 to April 14, 2026, that prohibits the acceptance, processing, review, or issuance of any land use or building application or permit for the construction, use change, or land division in all the Mixed-use RAID zoned areas (including the Rural Center, Rural Village, and Camano Gateway Village Zones) except for:

- Certain additions, repairs, remodels or alterations;
- Replacement in-kind, repair, or maintenance related to a mobile or manufactured home;
- Reconstruction on a single-family residence when destroyed by natural or accidental cause; or
- Applications or permits deemed complete or approved by the effective date of the moratorium.

The moratorium ordinance was adopted on an emergency basis to prevent development incompatible with the Comprehensive Plan update and implementing code changes that are included in this non-project action.

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.

This non-project proposal is to update the Island County Comprehensive Plan. The updated plan will apply to the entire County (Whidbey and Camano Islands). The Clinton subarea plan, code changes, and moratorium apply to specific zones as described in this checklist.

B. Environmental Elements

1. Earth

Find help answering earth questions³

a. General description of the site:

Island County is composed of Whidbey and Camano Islands, located in Puget Sound in northwestern Washington State. The County encompasses a diverse landscape that includes rural, agricultural, forested, and shoreline areas, as well as incorporated and unincorporated communities. The land is characterized by rolling terrain, bluffs, wetlands, streams, and extensive marine shoreline. The update to the Comprehensive Plan applies countywide and is non-project in nature.

Circle or highlight one: **Flat, rolling, hilly, steep slopes, mountainous, other: bluffs**

b. What is the steepest slope on the site (approximate percent slope)?

Island County contains a variety of topographical features. While much of the land consists of gently rolling terrain, certain areas, particularly coastal bluffs, contain slopes exceeding 40 percent. These steep slopes are most commonly found along shoreline bluffs on Whidbey Island and portions of Camano Island. Since this proposal is a non-project action covering the entire county, it includes areas with slopes ranging from 0 to over 40 percent. This is a non-project proposal that does not recommend or approve action on any specific site. Future development projects will be conditioned subject to consistency with unstable and steep slope regulations.

c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them, and note any

³ <https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-b-environmental-elements/environmental-elements-earth>

agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils.

Island County's soils are diverse, formed primarily from glacial activity. Common soil types include sandy loams, gravelly loams, clay loams, and areas of peat and muck in low-lying wetlands and depressions. The soil composition varies by location, with well-drained sandy and gravelly soils common in upland areas, and poorly drained organic soils more frequent in wetlands and depressions. The County also contains areas of designated agricultural land of long-term commercial significance, identified based on soil quality, historical use, and zoning criteria. These areas often include prime farmland soils such as those classified by the Natural Resources Conservation Service (NRCS) as Coupeville loam, Bow loam, and other high-value agricultural soils. As this is a non-project proposal that involves policy and planning updates at the countywide level, no soils, agricultural or otherwise, will be physically disturbed or removed by the comprehensive plan update.

d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.

Yes, Island County contains areas with a known history of unstable soils, particularly along coastal bluffs and steep slopes, which are prone to erosion and landslides. These areas typically consist of glacial till, silts, and clays that can become unstable when saturated. Notable zones of geologic hazard include parts of west-facing bluffs on Whidbey Island and shoreline slopes on Camano Island. The County designates these as geologically hazardous areas under its Critical Areas Ordinance, and they are subject to development restrictions and geotechnical review. Because this is a non-project action, no construction or disturbance is proposed. However, the Comprehensive Plan includes policies that guide future land use and hazard mitigation in areas with unstable soils.

e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill.

The Comprehensive Plan Update is a non-project action and does not directly authorize any fill, excavation, or grading. Individual development projects subject to the proposed ordinance could include fill, excavation, or grading. All such development projects would continue to be subject to existing development regulations related to stormwater management, impervious surfaces, critical areas, clearing and grading, and/or landscaping. Unless exempt under state and county requirements, filling, excavation and grading is also subject to SEPA review.

f. Could erosion occur because of clearing, construction, or use? If so, generally describe.

The Comprehensive Plan Update is a non-project action and does not directly authorize any fill, excavation, or grading. Individual development projects subject to the proposed ordinance could include fill, excavation, or grading. All such development projects would continue to be subject to existing development regulations related to stormwater management, impervious surfaces, critical areas, clearing and grading, and/or landscaping. Unless exempt under state and county requirements, filling, excavation and grading is also subject to SEPA review.

The 2025 Update is not expected to result in erosion from clearing, construction, or land use beyond what would have been expected without the proposed non-project action.

g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?

This is a non-project proposal. The Comprehensive Plan update does not include or authorize any specific development or construction activity. As such, it will not directly result in the creation of impervious surfaces. Future development projects consistent with the updated plan may involve increases in impervious surface area, but those changes will be reviewed through individual permit and SEPA processes at the project level.

h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any.

As a non-project action, the Comprehensive Plan update does not involve ground disturbance or direct impacts to the earth. However, the plan includes policies that support erosion control and protection of geologically hazardous areas. These include goals to preserve natural vegetation, minimize impervious surface expansion, and implement best management practices for stormwater and land development. Future development will be subject to existing County regulations, including the Critical Areas Ordinance, the Stormwater Management Manual, and the International Building Code, which require erosion and sediment control measures such as silt fencing, stabilized construction entrances, and revegetation. Project-specific erosion control plans will be reviewed during permitting.

2. Air

[Find help answering air questions⁴](#)

a. What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known.

This is a non-project proposal. The Comprehensive Plan update itself will not result in any construction, operation, or maintenance activities, and therefore will not directly generate air emissions. However, future development guided by the updated plan may result in typical emissions associated with land development, such as dust and vehicle exhaust during construction, and emissions from residential, commercial, and transportation uses during operation. These emissions will vary by project type and scale and will be reviewed individually through future project-specific SEPA evaluations and permitting processes. The Comprehensive Plan also includes goals and policies that encourage compact development, multimodal transportation, low-carbon energy use, and protection of forested and vegetated lands—all of which support long-term reduction in greenhouse gas and air pollutant emissions.

⁴ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-Air>

b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.

The 2025 Update is a non-project proposal that would not be affected by off-site sources of emissions or odors.

c. Proposed measures to reduce or control emissions or other impacts to air, if any:

As a non-project action, the Comprehensive Plan update will not directly result in air emissions. However, the plan includes policies that indirectly reduce emissions over time by promoting compact, transit-oriented development; preserving forested and vegetated lands; encouraging active transportation and low-emission vehicles; and supporting renewable energy use and energy-efficient building practices. Future projects developed under the plan will be subject to applicable air quality regulations and may implement measures such as dust suppression during construction, use of cleaner fuels or equipment, and compliance with Washington State Department of Ecology and Puget Sound Clean Air Agency standards.

3. Water

[Find help answering water questions⁵](#)

a. Surface:

[Find help answering surface water questions⁶](#)

1. Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.

Yes. Island County is surrounded by and contains numerous surface water bodies, including saltwater shorelines, freshwater lakes, streams, and extensive wetlands. The county is bordered by the waters of Puget Sound, including Admiralty Inlet, Saratoga Passage, Penn Cove, Possession Sound, and Skagit Bay. Inland surface waters include lakes such as Cranberry Lake, Goss Lake, Lone Lake, and Deer Lake, as well as numerous seasonal and perennial streams (e.g., Maxwelton Creek, Freeland Creek, Kristoferson Creek, and Crescent Creek). The County also has a significant number of mapped wetlands and critical freshwater habitat areas. Most streams ultimately discharge into the surrounding marine waters of Puget Sound. Because this is a non-project proposal, no direct impact to these water bodies is anticipated. However, policies in the Comprehensive Plan support protection of surface waters through land use planning, critical area protections, and stormwater management.

⁵ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-3-Water>

⁶ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-3-Water/Environmental-elements-Surface-water>

2. Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.

No. This is a non-project action that does not involve any physical construction or site disturbance. The Comprehensive Plan update does not propose work over, in, or adjacent to any surface waters. Any future development that occurs as a result of this plan will be subject to applicable shoreline regulations, critical area protections, and project-level environmental review at the time it is proposed.

3. Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.

None. This is a non-project action and does not propose or authorize any physical work, including fill or dredging of surface waters or wetlands. Therefore, no material will be placed in or removed from such areas as part of the Comprehensive Plan update. Any future project involving such activities will require separate review and permitting under local, state, and federal regulations, including compliance with the Shoreline Master Program, Critical Areas Ordinance, and applicable permits from the Washington State Department of Ecology and U.S. Army Corps of Engineers.

4. Will the proposal require surface water withdrawals or diversions? Give a general description, purpose, and approximate quantities if known.

No. The Comprehensive Plan update is a non-project proposal and will not require any surface water withdrawals or diversions. It does not authorize any specific development or infrastructure that would use or alter surface water systems. Any future water withdrawals or diversions associated with development under the plan will be subject to project-specific environmental review and permitting, including coordination with the Washington State Department of Ecology where applicable.

5. Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.

This is a non-project action that applies countywide and does not pertain to a specific development site. Island County does contain areas designated as 100-year floodplains, primarily along coastal shorelines, streams, lakes, and low-lying areas. These areas are mapped by FEMA and regulated under the County's Flood Damage Prevention Ordinance and Critical Areas Ordinance.

The Comprehensive Plan includes policies to guide future development away from hazard-prone areas, including floodplains, and to support flood hazard mitigation and climate resilience. Any future projects in mapped floodplains will be subject to applicable local, state, and federal floodplain regulations and reviewed on a case-by-case basis.

6. Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.

No. The Comprehensive Plan update is a non-project action and does not propose or authorize any activities that would result in the discharge of waste materials to surface waters. It is a policy-level document that guides future land use and development decisions.

Any future development proposals that may involve wastewater or stormwater discharge

will be reviewed and permitted separately and must comply with local, state, and federal water quality regulations, including National Pollutant Discharge Elimination System (NPDES) requirements and Island County's stormwater standards.

b. Ground:

[Find help answering ground water questions⁷](#)

- 1. Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give a general description, purpose, and approximate quantities if known.**

This is a non-project proposal that does not recommend or approve action on any specific site. Future development projects will be reviewed subject to consistency with applicable regulations for any groundwater withdrawal.

- 2. Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (domestic sewage; industrial, containing the following chemicals...; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.**

This is a non-project proposal that does not recommend or approve action on any specific site. Future development projects will be reviewed subject to consistency with applicable regulations for any waste discharge and waste system design.

c. Water Runoff (including stormwater):

- 1. Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.**

This non-project proposal will not create any runoff.

- 2. Could waste materials enter ground or surface waters? If so, generally describe.**

This non-project proposal will not cause any waste materials to enter ground or surface waters.

- 3. Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.**

This non-project proposal will not alter or affect drainage patterns.

d. Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any:

The proposal does not propose any measures to reduce or control surface, ground, and/or runoff water, and/or drainage pattern impacts because no impacts are proposed or expected. However, the Comprehensive Plan includes policies that guide future land use and stormwater

⁷ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-3-Water/Environmental-elements-Groundwater>

management. For example, the Capital Facilities Element and the 6-year Capital Improvement Program in the Comprehensive Plan Update include over \$40 million in projects to improve stormwater management and water quality. In addition, the proposed code updates to the mixed-use LAMIRD zones includes provisions for mitigation of stormwater impacts from new development.

4. Plants

[Find help answering plants questions](#)

a. Check the types of vegetation found on the site:

- deciduous tree: alder, maple, aspen, other**
- evergreen tree: fir, cedar, pine, other**
- shrubs**
- grass**
- pasture**
- crop or grain**
- orchards, vineyards, or other permanent crops.**
- wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other**
- water plants: water lily, eelgrass, milfoil, other**
- other types of vegetation**

b. What kind and amount of vegetation will be removed or altered?

No vegetation will be removed and/or altered by this non-project proposal.

c. List threatened and endangered species known to be on or near the site.

Island County includes plant species listed as threatened or endangered by the federal government and/or Washington State. They include Golden Paintbrush, White Meconella, White-top Aster, Bulb-bearing Water-Hemlock, Black Lily, Tall agoseris, and Alaska alkaligrass.

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any.

No measures to preserve and/or enhance vegetation are proposed, as no impacts are expected.

e. List all noxious weeds and invasive species known to be on or near the site.

Island County includes the following noxious weeds and invasive species: Butterfly Bush, English Ivy, Hairy Willowherb, Knotweed, Poison Hemlock, Purple Loosestrife, Spurge Laurel, Sulfur Cinquefoil, Tansy Ragwort, Yellow Archangel, Spartina, Milk Thistle, Musk Thistle, Bull Thistle, Canada Thistle, Scotch Thistle, Spanish Broom, Bighead Knapweed, Giant Hogweed, Garlic Mustard, Clary Sage, Common Cordgrass, Denseflowered Cordgrass, Purple Starthistle, Meadow Clary, Bohemian Knotweed, Giant Knotweed, Himalayan Knotweed, Japanese Knotweed, Brazilian Elodea, Common Fennel, Common Reed (non-native genotypes),

Dalmatian Toadflax, Eurasian Watermilfoil, Gorse, Hairy Willowherb, Orange Hawkweed, Yellow Hawkweed, Herb-Robert, Bighead Knapweed, Brown Knapweed, Diffuse Knapweed, Meadow Knapweed, Spotted Knapweed, Wild Chervil, Parrot Feather, Scotch Broom, Velvetleaf, Wild Chervil, Buffalobur, Common Catsear, Old-Man's-Beard, Common Groundsel, Common St. Johnswort, Common Tansy, Common Teasel, Curlyleaf Pondweed, English Ivy, Evergreen Blackberry, Himalayan Blackberry, Field Bindweed, Italian Arum, Japanese Eelgrass, Absinth Wormwood, Babysbreath, Smoothseed Alfalfa Dodder, Wild Carrot, Yellowflag Iris, Yellow Toadflax, Jubanta Grass, Garden Loosestrife, Purple Loosestrife, Perennial Pepperweed, Shiny Geranium, Sulfur Cinquefoil, English Hawthorn, Field Bindweed, Jubuta Grass, Lesser Celandine, Nonnative Cattail, Oxeye Daisy, Pampas Grass, Perennial Sowthistle, Reed Canarygrass, Scentless Mayweed, and Wild Carrot.

5. Animals

[Find help answering animal questions⁸](#)

- a. List any birds and other animals that have been observed on or near the site or are known to be on or near the site.**

Examples include:

- Birds: hawk, heron, eagle, songbirds, other: waterfowl, pelican.
- Mammals: deer, bear, elk, beaver, other: orca, gray whale, coyote, racoon.
- Fish: bass, salmon, trout, herring, shellfish, other: smelt.

- b. List any threatened and endangered species known to be on or near the site.**

Island County includes animal species listed as threatened or endangered by the federal government and/or Washington State. They include Coastal-Puget Sound Bull Trout, Hood Canal Summer Chum Salmon, Puget Sound Chinook Salmon, Puget Sound Steelhead, Steller Sea Lion, Gray Whale, Humpback Whale, Puget Sound/Georgia Basin Bocaccio, Puget Sound/Georgia Basin Yelloweye Rockfish, Puget Sound/Georgia Basin Canary Rockfish, Southern Resident Killer Whale, American white pelican, Bald eagle, Brown pelican, Common Loon, Great Blue Heron, Marbled Murrelet, Northern Spotted Owl, Osprey, Peregrine falcon, Pileated Woodpecker, Short-tailed Albatross, Trumpeter Swan, Western Pond Turtle, and Taylor's Checkerspot.

- c. Is the site part of a migration route? If so, explain.**

Island County is located along the Pacific Flyway, gray whales migrate between Whidbey and Camano Islands, and the County has smelt spawning areas and a few salmon bearing streams.

- d. Proposed measures to preserve or enhance wildlife, if any.**

⁸ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-5-Animals>

No measures to preserve or enhance wildlife are proposed, as no impacts are expected. The Comprehensive Plan updates contain measures for wildlife preservation and enhancement.

e. List any invasive animal species known to be on or near the site.

No known invasive animal species are known to be on or near the site.

6. Energy and natural resources

[Find help answering energy and natural resource questions⁹](#)

a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

This non-project proposal will not require any energy for heating, manufacturing, etc.

b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.

This non-project proposal would not affect solar energy in Island County.

c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any.

No energy conservation measures are included because no impacts are expected. The Comprehensive Plan Update includes goals and policies that encourage compact development and multimodal transportation, which support long-term reduction in energy impacts from growth.

7. Environmental health

[Find help with answering environmental health questions¹⁰](#)

a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur because of this proposal? If so, describe.

No environmental health hazards are expected from this proposal.

1. Describe any known or possible contamination at the site from present or past uses.

There are known Per- and Polyfluoroalkyl Substances (PFAS) and nitrate groundwater contamination in parts of Island County.

2. Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.

⁹ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-6-Energy-natural-resou>

¹⁰ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-7-Environmental-health>

This is a non-project proposal and does not involve development and design decisions nor affects from transmission pipelines as contemplated in this question.

- 3. Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.**

This is a non-project proposal, involving no development or construction.

- 4. Describe special emergency services that might be required.**

No special emergency services are anticipated to be required.

- 5. Proposed measures to reduce or control environmental health hazards, if any.**

None are proposed because no impacts are expected.

b. Noise

- 1. What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?**

Traffic, equipment, aircraft, and other noises exist in Island County, no impacts from these noises are expected on the non-project proposal.

- 2. What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site)?**

This non-project proposal will not create additional noise.

- 3. Proposed measures to reduce or control noise impacts, if any:**

No measures are proposed, as no impacts are expected.

8. Land and shoreline use

[Find help answering land and shoreline use questions¹¹](#)

- a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.**

Land use varies throughout Island County, including urban and rural densities, and resource lands.

See responses to questions 8.e and f. for lists of Island County zones and land use designations.

The denser areas are found in Limited Areas of More Intensive Rural Development (LAMIRD, also referred to as a RAID). LAMIRDs are designated rural areas that are outside of cities and Urban Growth Areas that allow for greater density. They are designated to limit rural sprawl by allowing for development, density of multiple use types, and the establishment of an outer boundary for this development.

¹¹ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-8-Land-shoreline-use>

Island County has approximately 21 mixed-use LAMIRDs that are identified in the ICC zoning code under Rural Village, Rural Center, Rural Service, and Camano Gateway Village Zone designations. A recent analysis of the mixed-use LAMIRDs, conducted by a planning consultant, Kimley-Horn and Associates, includes recommendations for better using these already denser areas to support additional housing and is included in this proposal.

The Mixed-use LAMIRDs are distributed across both islands along highways and other roadways including SR 532, E Camano Dr, and SRs 525 and 20. Cumulatively these areas are around 409 acres in size and make-up less than one percent of the land area in unincorporated Island County.

Residential LAMIRDs follow a similarly dispersed distribution pattern as Mixed-use LAMIRDs, include several that are located along the shorelines of both islands, and are served by county roads. There are approximately 50 Residential LAMIRDs and they make-up around 9,611 acres in area and are eight percent of the land area in unincorporated Island County.

Urban Growth Areas (UGAs) are generally located on the edges of the Cities of Oak Harbor, Coupeville, and Langley. Freeland is a non-municipal UGA (NMUGA). These areas make up 1,578 acres in area and are 13 percent of the county's area.

The Rural Zone is 65,088 acres in area and represents 56 percent of county land area. Rural Forest, Rural Agriculture, and Commercial Agriculture together are 23,940 acres and 20 percent of the county land area. The proposal is consistent with existing and planned land uses throughout the county.

b. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses because of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?

Agricultural lands are within the geographic area of this proposal; however, they are not converted to other uses by the Comprehensive Plan Update.

- 1. Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how?**

Working farm and forest lands are within the geographic area of this proposal; however, they will not affect the proposal.

c. Describe any structures on the site.

Many structures exist in Island County, such as single-family and multi-family residences, commercial structures, warehouses, barns, hospitals, and schools.

d. Will any structures be demolished? If so, what?

No.

e. What is the current zoning classification of the site?

This is not a site-specific proposal – a broad spectrum of zoning designations exist throughout the County, allowing a range of land uses. County zoning includes the following:

Rural Zoning Districts

- Rural (R)
- Rural Agriculture (RA)
- Rural Forest (RF)
- Commercial Agriculture (CA)
- Parks (PK)
- Accident Potential I, II (APZ I, APZ II), and Clear Zone

LAMIRD Districts

- Rural Residential (RR)
- Rural Center (RC)
- Rural Village (RV)
- Camano Gateway Village (CGV)
- Rural Service (RS)
- Light Manufacturing (LM)
- Airport (AP)
- Accident Potential I, II (APZ I, APZ II), and Clear Zone

Various Other Districts

- Special Review Districts (Pacific Rim Institute, Casey Conference Center, and Greenbank Farm Port Tract)
- Overlay Zones
- Shoreline Designations
- Ebey's Landing National Historic Reserve
- Freeland Zones
- Urban Growth Areas
- Oak Harbor Residential (OH-R), Oak Harbor Industrial (OH-I), Oak Harbor Highway Service Commercial (OH-HSC), Oak Harbor Planned Business Park (OH-PBP), and Oak Harbor Planned Industrial Park (OH-PIP)

The area within the boundaries of the Clinton Subarea Plan, which includes RR and RC Zones.

f. What is the current comprehensive plan designation of the site?

This is not a site-specific proposal – a diverse set of plan designations exist throughout the County, applying land use policies to a range of land uses.

The County provides for multiple land use designations to include the following:

- Rural Lands
- Residential LAMIRDs
- Mixed-use LAMIRDs

- Aviation
- Light Manufacturing
- Special Review Districts
- Unincorporated Municipal UGA
- Water Areas
- Urban Areas
- Federal

g. If applicable, what is the current shoreline master program designation of the site?

Shorelines around Island County are comprised of Shoreline Residential, Rural Conservancy, Urban Conservancy, Natural, Aquatic, and High Intensity.

h. Has any part of the site been classified as a critical area by the city or county? If so, specify.

This is a non-project proposal to update the Island County Comprehensive Plan, which includes provisions to preserve lands of long-term rural significance and prohibits the expansion of urban development into areas significantly constrained by critical areas.

Generally, the County has provided for Critical area definitions and designation criteria in the Comprehensive Plan. Aquifer Recharge Areas, Fish and Wildlife Habitat Conservation Areas (including Western Toad breeding sites and upland occurrences), Frequently Flooded Areas, Critical Aquifer Recharge Areas, Geologically Hazardous Areas, Shorelines, and Wetlands have all been identified in Island County. The County's critical areas ordinance has been updated periodically, consistent with state requirements.

Additionally, the plan provides guidance for the coordination of regulations to protect the environment, including a new Climate Element.

i. Approximately how many people would reside or work in the completed project?

This is a non-project proposal. Island County's population was 86,857 in 2020 and is projected to be 99,202 by 2045, the end of the 20-year planning period. This is slightly less than the middle of a range, 102,639, of population estimates offered by the state for planning purposes. The jobs allocation for unincorporated Island County is 6,715 jobs out of a total of 25,957 jobs for Island County as a whole.

The following table shows the population growth estimates as assigned to Island County by the state Office of Financial Management (OFM), analyzed in this checklist in combination with consideration of the other environmental documents incorporated by reference in the response to question 8 in *Section A. Background*, on page 3 of this checklist:

Population Estimates and Portions Assigned to Unincorporated Island County – Scenarios Analyzed in Existing SEPA Documents and this SEPA Checklist

	<u>November 1996</u> Comprehensive Plan Draft EIS	<u>March/July 1998</u> Comprehensive Plan Supplemental EIS	<u>August 2025</u> Comprehensive Plan SEPA checklist
Planning Period	1996 to 2016	1996 to 2020	2025 to 2045
County Population Estimate	OFM mid-range estimate: 101,300	OFM high estimate: 118,800	OFM low to mid-range estimate: 99,202
Total increase in population	32,400	43,900	12,345
Population Increase in unincorporated Island County	18,517	30,500	4,107*
Percentage share of total population assigned to unincorporated Island County	57%	69%	33%

* From the Land Capacity Analysis, December 2025 (Island County Planning and Community Development), Table 3.

The County Planning and Community Development Department has reviewed the information in the EIS documents included in the table above along with updated information in this checklist to inform decision makers on the impacts associated with planning for growth within the County through 2045. The County is now planning for a lower population projection than analyzed in the 1998 Supplemental EIS, with the percentage share of population assigned to unincorporated Island County reduced by more than half.

In addition, adoption of the Clinton Subarea Plan, moratorium, and updates to Island County Code (ICC) are proposed to be responsive to state requirements for meeting housing needs, including affordable housing, in Island County through 2045. The zoning changes and resulting development capacity are summarized below.

Zoning Capacity Estimates Related to the Proposed Changes to Regulations

Proposals	Summary of Code Changes	Estimated Increase in Zoning Capacity
		<p>Code changes add capacity to zoning that influences the location and type of housing. This capacity is intended to serve the population growth projection used in the Comprehensive Plan update.</p>
<p>ADU proposals</p> <ul style="list-style-type: none"> Urban Growth Areas, Residential LAMIRDs (Rural Residential Zones); Rural, Rural Forest, and Commercial Agriculture Zones. <p>(35/year limit on Detached ADUs (DADUs) currently does not apply to in UGAs)</p>	<ul style="list-style-type: none"> Allow 2nd ADU in UGAs and Residential LAMIRDs; Remove Residential LAMIRDs from the 35 ADU/year limit; Allow 25 DADUs per year in addition to the limit of 35 when affordable up to 80% AMI for 3 to 5 years in Rural, Rural Forest, and Commercial Agriculture Zones (the unused portion of a 25/year limit may rollover into the following year); Where 2 ADUs allowed, allow 2 DADUs in one structure; Allow ADUs to be conveyed as condominiums in all zones. 	<p>The housing capacity increase is 1,002 ADUs* with an additional increase of 120 affordable ADUs for a total in unincorporated IC of 1,122 ADUs.</p> <p>6 affordable DADUs/yr are assumed in UGAs, Residential LAMIRDs and in addition to the limit of 35 DADUs/year in other rural areas.</p>
<p>Code Changes in Mixed-use LAMIRDs in RC, RV, RS, and CGV Zones.</p>	<ul style="list-style-type: none"> Apply minimum lot size of 0.5 acres; Apply minimum residential density of 4 units per acre; 	<p>Capacity for 758 additional housing units in the RC, RV, and CGV Zones.** The capacity created here is anticipated to be housing other than single-family</p>

	<ul style="list-style-type: none"> • Apply maximum density of 8 units per acre; • Apply maximum density of 12 units per acre, when affordable units are provided; • Allow 1 duplex, triplex or fourplex on lots nonconforming to minimum lot size requirement; • Allow 3 stories with a building height of 40 feet, excluding rooftop mechanical equipment and accessories; • Allow multifamily development up to 4,000 square feet in the RV Zone and up to 12,000 square feet (including group homes) in the CGV Zone; • Allow multifamily development as a Type II conditional use process over 4,000 square feet in RV Zone, and over 12,000 square feet in the CGV Zone. 	<p>homes and ADUs, such as multiplexes and apartments above shops.</p> <p>No capacity change is assumed in the RS Zone.</p>
<p>Updates to Rural Cluster Housing Provisions</p> <p>Rural, Rural Agriculture, Commercial Agriculture or Rural Forest Zones.</p> <p>(Currently called Planned Residential Development)</p>	<ul style="list-style-type: none"> • Allows density increases for Rural Cluster and Rural Affordable Cluster options; • Increased density varies by zone, lot area, and open space provided; • In a Rural Affordable Cluster housing shall be affordable as rental or ownership housing under 100% AMI permanently via deed restriction; • Open space or conservation area equal to 65 to 80% of lot area; • Decision type (Type II or III) based on zone, number of 	<p>Capacity for 260 dwelling units (including 200 affordable), assumes 3 permit applications every 2 years on average – one affordable and two market-rate.</p>

	<p>dwelling units, and cluster option;</p> <ul style="list-style-type: none"> • Must be served by Group A or B water system; • May include stick-built, manufactured, tiny homes meeting International Building Code; • Housing may be attached or detached. 	
Co-living Housing Any residential zone in a NMUGA, Rural Residential, Rural Center, Rural Village, and Camano Gateway Village Zones.	<ul style="list-style-type: none"> • Apply the standards for single-family homes in RR Zones; • Apply the standards for multifamily housing in all other zones; • Parking required at 0.25 spaces per sleeping unit; • Count sleeping units as 0.25 of dwelling unit where density limits apply; • Count sleeping units as 0.5 dwelling unit for sewer connection fees; • Apply standards for potable water and sewage disposal; • Require building permits to establish new and convert existing structures; • Apply applicable building, fire, and health and safety codes. 	<p>20 developments with 4 sleeping rooms each over 20 years for a total of 80 sleeping rooms.</p> <p>Capacity increase results from a new housing type that more efficiently houses people than currently allowed housing types.</p>
Recreational Vehicles (RVs) Temporary use of RVs for housing - applies in Rural and Rural	<ul style="list-style-type: none"> • Allow RVs in a Rural or Rural Residential Zone for up to one year with extensions allowed; • Subject to Type I Temporary Use approval, life-safety inspection, and provision of utilities. 	<p>RVs on single family lots are temporary capacity. 2 RVs per year for 20 years for a total of 40 RVs.</p> <p>RV use on single-family lots are transitional shelters.</p>

Residential Zones.		
Unit Lot Subdivisions (ULS) Allows subdivision of a lot intended for residential development as allowed by state law.	<ul style="list-style-type: none"> Allows ownership of housing units and the land underneath; No portions of a housing unit may overlap another; Development standards are applied to the original (parent) lot rather than individual unit lots; Permit applications are reviewed and approved by procedures based on the number of proposed unit lots. 	No housing capacity change assumed.
Misc. Code Changes	<ul style="list-style-type: none"> Prohibit mini-storage, outdoor storage, and warehouses in RR, RC, RV, RS, and CGV Zones. Prohibit single-family houses in RC, RV, RS, and CGV Zones. Modify standards to remove barriers to installation of solar panels and building insulation. Minor clarifications and code clean-up in various zones. 	No housing capacity change assumed.

* From the Land Capacity Analysis, December 2025 (Island County Planning and Community Development), Table 13.

**From the Kimley-Horn and Associates, RAID Density Analysis Memo to Island County, November 15, 2024.

Unincorporated Island County (IC) – Land Area Break-out by Zoning

Zoning District(s)	Acres*	Percentage of Unincorporated Land Area in IC
Rural	65,088	56%
Rural Forest	13,045	11%
Rural Agriculture	6,504	5%
Commercial Agriculture	4,391	4%
Rural Residential LAMIRDS	9,611	8%

Mixed-use LAMIRDs	409	<1%
Oak Harbor UGA	1,089	9%
Freeland UGA	451	<1%
Camano Rural**	14,680	12%
Airport	287	<1%
TOTAL	115,556	100% +/-

*From the Land Capacity Analysis, December 2025 (Island County Planning and Community Development), Table 10, excluding Langley and Coupeville UGAs, which are small in area and/or number of developable parcels benefiting from the proposed code changes.

**Category includes Rural, Rural Forest and Rural Agriculture Zoning on Camano Island.

Constraints on the land area available to site housing units in the capacity increase estimate will be reduced due to local conditions including:

- Known septic constraints and available water connections will limit capacities in some areas.
- Approximately an average of 22% of unincorporated Island County lands are encumbered by critical areas.

The total estimated capacity increase is as follows:

Code Change Proposal	Housing Capacity Increase Over 20 Years	Affected Zones	Notes on Affordable Housing Capacity
ADUs	1,122 ADUs	<ul style="list-style-type: none"> • Residential LAMIRDS (Rural Residential Zones); • Rural, Rural Forest, and Commercial Agriculture Zones. 	120 ADUs (out of 1,122) affordable up to 80% AMI.
Mixed-use LAMIRDs	758 multi-family dwelling units	RC, RV, and CGV Zones.	758 duplex, triplex and fourplex, and apartments available as market rate affordable, including 0 to 80% with federal and state funding.

Rural Cluster Housing	260 dwelling units	Rural, Rural Agriculture, Commercial Agriculture or Rural Forest Zones.	200 dwelling units (out of 260) affordable at up to 50% and 80% of AMI.
Co-living Housing	20 developments with 80 sleeping rooms	NMUGA, Rural Residential, Rural Center, Rural Village, and Camano Gateway Village Zones.	80 sleeping rooms are available as market-rate affordable up to 80% AMI.
RVs on SF lots	40 RVs	Rural, Rural residential, Rural Commercial, Rural Village, Camano Gateway Village Zones.	40 shelter units available.
TOTAL over the 20-year planning period, and dwelling units per year	2,180 dwelling units (includes sleeping rooms in Co-living housing, and RVs for shelter). 109 dwelling units/yr.	NA	Housing for All Planning Tool (HAPT) income range deficit for 0 to 80% AMI is 1,118 dwelling units. The portion of the increased housing capacity specifically estimated as available to serve the deficit is 1,198 DUs. The overall housing capacity increase, which is approximately 55% of total increase, provides the zoning allowance to more than meet the HAPT need.

The proposed code changes to implement state legislation and the 2025 Comprehensive Plan update apply to various zoning and land use designations. Taken together they create additional capacity for a greater variety of housing development, focusing on UGAs and LAMIRDs, that is relatively evenly dispersed around unincorporated Island County. In addition, only a portion of the overall additional capacity is likely to be used during the 20-year timeframe for the Plan update due to limitations in the real estate market, logistics, and costs related to providing necessary utilities, and environmental protections such as critical areas and shoreline regulations. No probable significant adverse impacts on the environment to land and shoreline use are anticipated from the proposal.

j. Approximately how many people would the completed project displace?

None.

k. Proposed measures to avoid or reduce displacement impacts, if any.

This non-project proposal will not displace any people. The updated Comprehensive Plan will include goals and policies to accommodate housing affordable to all income levels.

l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any.

The updated Comprehensive Plan, including the Clinton Subarea Plan, informs projected land uses and plans.

The code change proposal is consistent with the updated Comprehensive Plan.

The temporary moratorium on development in the Mixed-use RAID zones is intended to prevent incompatible land uses and construction in the applicable area until the proposal is adopted.

m. Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any:

This non-project proposal is not expected to impact agricultural or forest lands of long-term commercial significance.

9. Housing

Find help answering housing questions¹²

a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.

This non-project proposal will inform housing allocations over the 20-year life of the Comprehensive Plan and will not directly create any housing. Future housing needs for Island County are based on a countywide population projection. The population

¹² <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-9-Housing>

projection is provided by the state OFM. In addition, the Department of Commerce provides a mechanism, called the Housing for All Planning Tool (HAPT), to estimate housing needs (targets) by household income using the population projection.

Unincorporated Island County has been determined to have a housing capacity of 7,904 dwelling units. The housing capacity in the county is sufficient to accommodate the overall housing target (projected need) assigned by the state of 2,387 dwelling units.

The following table* outlines the housing target broken down by income levels:

Income levels (As a % of Area Median Income for households in the County)	Projected Need (Dwelling units)	Island County Housing Capacity (Dwelling units)	Capacity Surplus/Deficit (Dwelling units)
0 – 50%	986	70	-916 deficit
50 – 80%	414	212	-202 deficit
80 – 100%	196	565	369 surplus
100 – 120%+	791	7,057	6,267 surplus

*From the Land Capacity Analysis, December 2025 (Island County Planning and Community Development), Table 18.

The deficits in the 0 – 80% AMI portion of housing income are intended to be addressed by the code updates that are proposed and analyzed in this checklist. Additional code updates and funding may be needed from the County as ongoing work to implement the Island County 2045 Comprehensive Plan in the future to further address portions of the affordability spectrum included in the table above. No probable significant adverse impacts on the environment to housing are anticipated from the proposal.

b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.

No housing units will be eliminated by this proposal.

c. Proposed measures to reduce or control housing impacts, if any:

No measures are need for this non-project proposal. The state of Washington requires the updates to the Island County Comprehensive Plan to include policies that provide for a wide range of housing types to accommodate the needs of all economic segments of the population over the 20-year planning period. The proposed updates to development regulations are intended to carry out state required housing solutions intended to reduce or eliminate housing impacts. The moratorium is intended to prevent the loss of housing capacity due to incompatible development.

10. Aesthetics

[Find help answering aesthetics questions¹³](#)

- a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?**

No structures are proposed.

- b. What views in the immediate vicinity would be altered or obstructed?**

No views would be obstructed by this non-project proposal.

- c. Proposed measures to reduce or control aesthetic impacts, if any:**

No measures are need for this non-project proposal. The proposed updates to the Comprehensive Plan, including the Clinton Subarea Plan, and changes to codes will limit the unnecessary expansion of UGAs, while still allowing for development to occur in a logical and orderly manner. This will help prevent leap-frog development and the premature conversion of rural lands into sprawl, which will in turn support efforts to preserve Island County's rural character.

11. Light and glare

[Find help answering light and glare questions¹⁴](#)

- a. What type of light or glare will the proposal produce? What time of day would it mainly occur?**

No light and/or glare will be produced by the proposal.

- b. Could light or glare from the finished project be a safety hazard or interfere with views?**

No light and/or glare will be produced, providing no opportunity to create safety hazard and/or interfere with views.

- c. What existing off-site sources of light or glare may affect your proposal?**

This non-project proposal will not be affected by off-site light and/or glare.

- d. Proposed measures to reduce or control light and glare impacts, if any:**

No measures are proposed as no impacts are expected from this non-project proposal.

¹³ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-10-Aesthetics>

¹⁴ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-11-Light-glare>

12. Recreation

[Find help answering recreation questions](#)

- a. What designated and informal recreational opportunities are in the immediate vicinity?**

Island County has approximately seven State parks, and the Island County Parks, Recreation, and Open Space (PROS) plan includes a Parks Plan chapter that lists approximately sixty-seven county parks and open spaces.

- b. Would the proposed project displace any existing recreational uses? If so, describe.**

No, this non-project proposal will not displace any recreational uses.

- c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:**

No measures are proposed as there are no impacts from this non-project proposal. The updates proposed for the Parks, Recreation, and Open Space Element of the Comprehensive Plan and the PROS Plan are intended to guide recreation opportunities. The Clinton subarea plan includes a Parks and Open Space chapter that includes park and recreational goals and policies. Overall, the Comprehensive Plan includes language related to increasing public recreational opportunities while respecting the ecological functions of shoreline and natural areas.

13. Historic and cultural preservation

[Find help answering historic and cultural preservation questions¹⁵](#)

- a. Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers? If so, specifically describe.**

Island County contains Ebey's Landing National Historic Reserve and numerous historic structures and sites.

- b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.**

A large number of archaeological and/or historic sites exist in Island County.

- c. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc.**

¹⁵ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-13-Historic-cultural-p>

This does not apply to this non-project proposal. In addition, no updates are proposed to the existing goals and policies in the Historic Element of the Island County Comprehensive Plan.

d. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.

No measures are proposed as no impacts are expected from this non-project proposal.

14. Transportation

[Find help with answering transportation questions¹⁶](#)

a. Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any.

No access to the street system is proposed as this is a non-project action. Review of the 20-year projections and Level of Service standards indicated that no new roads are required to accommodate the growth. The most current proposal for transportation projects can be found on the most recently adopted Transportation Improvement Program (TIP).

b. Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?

Island County is served by Island Transit and the Washington State Ferries. Transit stops are located through-out the County. Ferry terminals are located in Clinton and Coupeville/Keystone.

c. Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle, or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private).

This non-project proposal will not require new or improved roads or other transportation facilities as contemplated by this question.

d. Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.

This is a non-project proposal, involving no development or construction.

e. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates?

¹⁶ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-14-Transportation>

This is a non-project proposal, involving no development or construction. As this is a non-project action, traffic impacts are not a direct result. However, traffic increases were modeled based on projected population increases and the proposal. The Transportation Element identifies current (2025) and modeled traffic volumes for 2045. Only overall growth of traffic volumes was identified, and this does not have significant impacts to the level of service on the transportation system. No probable significant adverse impacts on the environment to transportation are anticipated from the proposal.

f. Will the proposal interfere with, affect, or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.

This is a non-project proposal, involving no development or construction.

g. Proposed measures to reduce or control transportation impacts, if any:

This is a non-project proposal, involving no development or construction. The updates to the Comprehensive Plan and the Clinton Subarea Plan, particularly in the Transportation Element of the Comprehensive Plan, include policies for the intergovernmental coordination in planning for roadways, public transportation and non-motorized transportation that serve Island County. The Transportation Element provides guidance for maintaining and improving the county's transportation system. It includes level of service standards, and goals and policies intended to limit negative environmental impacts and encourage walking, bicycling and transit use. The code change proposal is consistent with the Transportation Element of the Comprehensive Plan

15. Public services

Find help answering public service questions¹⁷

a. Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe.

An increased need for public services will occur; however, the proposal will not create an increased need for public services in and of itself as a non-project proposal. Growth is being directed toward urban areas where a denser population may require increased services. This will result in less need for services overall, as providing the public services in the dispersed rural areas of Island County would require more services overall. An anticipated public service update is a study that is anticipated to study construction of a sewer system in the Clinton Non-Municipal Urban Grown Area.

b. Proposed measures to reduce or control direct impacts on public services, if any.

¹⁷ <https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-b-environmental-elements/environmental-elements-15-public-services>

No measures are needed for this non-project proposal. Directing growth toward urban areas is intended to more efficiently provide public services that already exist. The Capital Facilities Element established level of service standards, analyzes existing services and identifies any gaps in services. Both capital and non-capital suggestions to address these gaps are proposed.

16. Utilities

[Find help answering utilities questions¹⁸](#)

- a. Circle utilities currently available at the site: electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other: high-speed internet.
- b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.

No new utilities are proposed for this non-project proposal. Individual development projects will be evaluated for utility needs during permitting and/or construction.

C.Signature

[Find help about who should sign¹⁹](#)

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

X

Signature on file

Type name of signee: Michael Podowski

Position and agency/organization: Long Range Planner, Island County Department of Planning and Community Development

Date submitted: December 5, 2025

¹⁸ <https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-b-environmental-elements/environmental-elements-16-utilities>

¹⁹ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-C-Signature>

D. Supplemental sheet for nonproject actions

[Find help for the nonproject actions worksheet²⁰](#)

Do not use this section for project actions.

Because these questions are very general, it may be helpful to read them in conjunction with the list of the elements of the environment.

When answering these questions, be aware of the extent the proposal, or the types of activities likely to result from the proposal, would affect the item at a greater intensity or at a faster rate than if the proposal were not implemented. Respond briefly and in general terms.

1. How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise?

The proposal is not expected to increase discharge to water; emissions to air, production, storage, or release of toxic or hazardous substances, or production of noise. The proposal would establish goals and policies to guide and direct growth. The goals and policies would prioritize growth focused on providing adequate supply of appropriately zoned land to accommodate the state's housing allocations by income levels into land use patterns intended to minimize overall environmental impacts, including promoting locations for new growth away from critical areas and agricultural and forestry lands.

Future development consistent with the proposal and implementing zoning could result in the following impacts:

- Grading and filing, new impervious surface, or vegetation removal could result in altered surface water flows, increased stormwater flow, localized flooding impacts, and generation of non-point source pollution to local surface waters.
- Increased vehicle trips could increase air emissions or result in additional noise.
- Construction activities could temporarily produce toxic or hazardous substances, generate noise from the use of construction equipment, or result in additional exhaust and dust on site, along hauling routes, or on local streets.
- Commercial and industrial uses may handle hazardous materials as allowed by the International Fire Code and state and federal laws.

No probable significant adverse impacts on the environment are anticipated from the proposal.

• Proposed measures to avoid or reduce such increases are:

By directing future growth away from critical areas, the proposal may limit stormwater and development related discharges and additionally provides a policy framework intended to protect water and air quality, address climate change,

²⁰ <https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-d-non-project-actions>

minimize excessive noise, and prevent pollution such as the release of toxic substances.

Future development would be required to meet the Island County Code (ICC) and be conditioned to mitigate impacts as part of the permit review process, including application of stormwater, environmentally critical area, and shoreline regulations.

2. How would the proposal be likely to affect plants, animals, fish, or marine life?

It is unlikely that this proposal will affect plants, animals, fish, or marine life. The proposal may positively affect plants, animals, and marine life by managing and directing growth away from critical areas.

Future development allowed by the Comprehensive Plan update and implementing zoning could affect plants and animals through land clearing for construction and human activity.

No probable significant adverse impacts on the environment, on plants and animals, are anticipated from the proposal.

- Proposed measures to protect or conserve plants, animals, fish, or marine life are:**

The Comprehensive Plan Update includes a Natural Resources Element with goals and policies that protect or conserve plants, animals, fish, and marine life. A new Climate Element includes goals and policies to respond to impacts of climate change, including proactive measures and adaptation strategies to improve the resilience of Island County and plants and animals.

Future development would be required to meet the ICC and conditioned to mitigate impacts as part of the permit review process, including application of stormwater, environmentally critical area, and shoreline regulations.

3. How would the proposal be likely to deplete energy or natural resources?

The proposal is expected to protect natural resources and encourage more efficient development by encouraging logical and orderly growth that can be served by urban or rural services as appropriate. This has the potential to decrease the demands for energy or natural resources. Demands for energy and natural resources will increase along with population growth and associated development irrespective of the proposal. No probable significant adverse impacts on the environment related to energy or natural resource depletion are anticipated from the proposal.

- Proposed measures to protect or conserve energy and natural resources are:**

The updated goals and policies in the Comprehensive Plan, including adoption of the Clinton Subarea Plan, are intended to protect natural resources and encourage more efficient development by encouraging logical and orderly growth that can be served by appropriate services. This has the potential to decrease the demand for energy or natural resources. In addition, the proposed code changes include amendments to standards to remove barriers to the installation of rooftop solar panels and adding thermal insulation to the exterior of structures. The code change proposal is consistent with the goals and policies in the Comprehensive Plan.

4. How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection, such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?

No direct impacts to environmentally sensitive areas or areas designated, or eligible or under study, for government protection are expected as a result of this non-project action. Population and employment growth would likely increase demand for parks and place additional pressure on areas included in this question irrespective of the proposal. The proposal may positively affect environmentally sensitive areas by directing growth away from critical areas and buffers. The updated goals and policies also generally prohibit urbanization of floodplains and prime farmlands.

No probable significant adverse impacts on the environment related to environmentally sensitive areas or areas designated, or eligible or under study, for government protection are anticipated from the proposal.

- Proposed measures to protect such resources or to avoid or reduce impacts are:**

The proposal includes measures designed to focus future urban growth and development in less environmentally sensitive areas and strongly discourages growth and development in critical areas and buffers. The proposed policies would generally prohibit urbanization of prime farmlands and floodplains.

The proposed Comprehensive Plan includes a Parks, Recreation, and Open Space Element that includes goals and policies to provide for recreation and open space to serve the needs of the growing population. The existing Comprehensive Plan includes goals and policies to avoid or minimize potential impacts to historic and cultural resources, which are not included in this update.

5. How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?

Incompatible land uses would not be allowed or encouraged by the proposal. The proposal does not specifically address shoreline areas. Shoreline areas will continue to be managed through the Island County Shoreline Master Program; however, the proposed policies do contain measures designed to prevent future urbanization in areas subject to flood hazards, and in Island County these tend to occur primarily in shoreline areas. Also, by encouraging growth and development to occur away from critical areas, such as streams and wetlands, the proposal may limit water quality impacts in shoreline areas.

No probable significant adverse impacts on the environment on land and shoreline use are anticipated from the proposal.

- Proposed measures to avoid or reduce shoreline and land use impacts are:**

The moratorium on development in the Mixed-use RAID zones is intended to prevent incompatible land uses and construction in the applicable area.

The proposed goals and policies do contain measures designed to prevent future urbanization in areas subject to flood hazards, and in Island County these tend to

occur primarily in shoreline areas. Also, by encouraging growth and development to occur away from critical areas, such as streams and wetlands, the proposal may limit water quality impacts in shoreline areas.

6. How would the proposal be likely to increase demands on transportation or public services and utilities?

The proposal is likely to increase demands on transportation and public services and utilities in certain areas to accommodate future growth. The Comprehensive Plan update includes goals and policies that seek to increase the amount of growth directed into urban growth areas and LAMIRDs. Demand for transportation, public services and utilities is likely to increase as growth and new development occurs. No probable significant adverse impacts on the environment related to transportation or public services and utilities are anticipated from the proposal.

- **Proposed measures to reduce or respond to such demand(s) are:**

Growth is being directed to areas with more services to decrease transportation demands. Public services and utilities will also require less infrastructure to service a denser population.

The Transportation Element includes adopted level of service standards, incorporates local, regional, and state transportation policies, and focuses on interjurisdictional collaboration to support infrastructure needs to address growth as assigned to the county by the state. Key components of the element include multi-modal programs, projects, and services that address needs at a system level to reduce or manage transportation impacts. The six-year Transportation Improvement Program details specific projects identified to mitigate the impacts of growth.

The Capital Facilities and Utilities Element include goals and policies to provide adequate capital facilities and public services necessary to support existing development and new growth. The element also addresses financing, planning, designing and siting capital facilities as well as the provision of services and utilities to address the needs of growth.

The Parks, Recreation, and Open Space Element guide the expansion and maintenance of the county's park system to promote a healthy recreational and open space environment including parks, trails, and open space to address the needs of growth.

7. Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.

This proposal contains provisions to coordinate and implement, rather than conflict with, applicable local, state, or federal laws. The Comprehensive Plan goals and policies direct more growth to urban areas than has historically occurred. In addition, House Bill 1181, passed in the 2023-2024 session, requires that the county adopt a new Climate Element as part of the comprehensive plan update. This element is intended to protect the environment, and to foster resiliency to climate impacts and natural hazards, among other protections.