



Planning Commission Recommendation

To: Burlington City Council

From: Burlington Planning Commission

Project: 2026 Capital Improvement Plan (CIP) Update

Date: October 29, 2025

Summary:

The Planning Commission has reviewed a revised Capital Improvement Plan (CIP) prepared by the Community Development Department. The Planning Commission finds that the updated CIP is consistent with the City's Comprehensive Plan and applicable Growth Management Act (GMA) requirements. The Planning Commission recommends the City Council adopt the updated CIP.

Findings:

1. The City of Burlington is required to adopt, and periodically update, a comprehensive plan (RCW 36.70A.040).
2. Washington State law requires that the City's comprehensive plan include a capital facilities element identifying the facilities, property, and equipment necessary to meet the needs of the population and employment growth forecasted by the comprehensive plan (RCW 36.70A.070(3) and WAC 365-196-415)).
3. The capital facilities element of the comprehensive plan must include a detailed financing plan identifying specific costs and sources of revenue for a six-year period. This financing plan is known as a Capital Improvement Plan (CIP).
4. In order to ensure the CIP covers a six-year period, and to ensure consistency with current financial conditions, the CIP must be updated annually.

5. The Washington State Growth Management Act (GMA) requires that comprehensive plans be internally consistent documents and that all local government actions be consistent with the adopted comprehensive plan (RCW 36.70A.120).
6. The Planning Commission has reviewed the updated CIP prepared by the Community Development Department and finds that it is generally consistent with the City's adopted Comprehensive Plan and all applicable GMA requirements.
7. The Planning Commission has reviewed the proposed capital investment plan recommended by the Parks and Recreation Advisory Board signed May 15, 2025.
8. The Planning Commission finds that the following capital projects recommended by the Parks and Recreation Advisory Board are conceptual or long-range planning exercises that should be incorporated into the ongoing Parks Recreation and Open Space (PROS) plan update. The Planning Commission finds that evaluating these projects as part of the PROS plan update will eliminate duplicative work, allow potential park investments to be evaluated together in a coherent fashion, and will allow scarce capital resources to be applied to ongoing construction and design projects.
 - a. (new project) – Westside Feasibility Study
 - b. (new project) – Burlington Hill Feasibility Study
 - c. 7-2025-2 – Pump Track Feasibility Study
 - d. 7-2025-1 – Pickleball Feasibility Study
9. With respect to the "land acquisition" project identified in the Parks and Recreation Advisory Board's recommendation, the Planning Commission makes the following findings:
 - a. The Planning Commission notes that the CIP is fundamentally a capital planning document. The purpose of the CIP is to identify specific capital improvement projects and the funding sources that will be used to pay for them. The CIP is not a vehicle for reserving money for future unspecified projects. As such, land acquisition should only be included in the CIP if the acquisition is associated with, and necessary to carry out, a specific park project. At present, the Planning Commission finds that no basis exists for determining how much land might be needed, what specific geographic areas might be targeted, or what specific park uses the land might support.
 - b. The "land acquisition" project identified in the Parks and Recreation Advisory Board recommendation includes an estimated cost of \$1 million and specifies that "grant funding" will be used to pay this cost. No specific grant funding source is identified. The Planning Commission finds that such a funding source is overly speculative and non-specific. The Planning Commission is unaware of any

grant funding sources that could be used to speculatively acquire land in advance of a specific use. In addition, a \$1 million grant would represent an extraordinary award that would be inconsistent with the City's past grant awards. Accordingly, the Planning Commission finds that the proposed funding source for this project is not realistic and therefore inconsistent with the requirements of RCW 36.70A.070(3)(d).

- c. The Planning Commission understands the Parks and Recreation Advisory Board's goal may have been to expand park access in geographically underserved areas. This is a laudable goal that the Planning Commission supports; however, as currently structured, the proposed land acquisition project is premature. Instead, the Planning Commission finds that potential land acquisition needs, and the identification of underserved areas which might support the need for additional park land, should be addressed through the ongoing PROS plan update.
10. With respect to the proposed "gravel walking path" at Skagit River Park, the Planning Commission notes that the GMA requires that Comprehensive Plans be "internally consistent" (RCW 36.70A.070). The proposed gravel walking path is not identified in the current PROS plan or the Comprehensive Plan, but many other, as yet unfunded, pathways are. Accordingly, the Planning Commission finds that the proposed gravel walking path does not comply with the consistency requirements of the GMA.
11. The Community Development Department reviewed capital planning information submitted by Dike District 12, Skagit Valley Community College, Skagit PUD, and Skagit Area Transit (SKAT). The Community Development Department determined that the capital planning information submitted by these agencies was sufficient to demonstrate consistency with the Burlington Comprehensive Plan.
12. The Community Development Department reviewed the capital planning information provided by Skagit County. Skagit County has developed, and is preparing to adopt, a six-year CIP that is consistent with the Burlington Comprehensive Plan.
13. With respect to the capital planning information submitted by the Burlington Edison School District (BESD), the Planning Commission makes the following findings:
 - a. Burlington Comprehensive Plan Policy (BCPP) 6.4.1.1 states that all agencies operating in the City of Burlington shall maintain detailed capital plans and that capital plans must (a) cover a period of at least six years, (b) be updated annually, (c) be based on the population and employment projections adopted by the City, and (d) be consistent with the Burlington Comprehensive Plan.

- b. BCPP 6.5.1.1 states that elements of a capital plan related to population or employment growth, such as student enrollment, shall be based on, and clearly cite, the City's adopted population and employment projections.
- c. The Burlington Edison School District (BESD) last adopted a capital plan in 2021 covering a period through the year 2026. The Planning Commission finds that BESD's capital plan has not been updated annually and, as of the year 2025, does not cover a six-year period as required by BCPP 6.4.1.1.
- d. The Planning Commission finds that BESD does not have a conforming capital plan and is not conducting planning activities consistent with the Burlington Comprehensive Plan.

14. With respect to the Housing Authority of Skagit County (HASC), the Planning Commission makes the following findings:

- a. The Planning Commission finds that HASC is the primary government agency charged with providing affordable and subsidized housing in the City of Burlington.
- b. The Planning Commission has reviewed communications between the City's Community Development Department and HASC. This communication shows that Community Development staff provided HASC with official housing needs projections adopted by the Skagit Council of Governments (SCOG). The SCOG projections provided to HASC were developed using an approved forecasting model developed by the Washington State Department of Commerce (HAPT tool). The SCOG projections provided to HASC show that through the year 2045, a minimum of 2,843 housing units will be needed in the City of Burlington. Relevant to HASC's role, 893 of the projected housing units will need to be affordable to households earning a median income of 30 percent or less of the Area Median Income (AMI). A further 572 will need to be affordable for households with an income between 31 and 50 percent of the AMI.
- c. Providing the 1,465 housing units needed for households with incomes of 50 percent or less than the AMI will likely require some form of public support or subsidy. Support may also be required for households with higher incomes. The Planning Commission finds that as the primary public agency charged with developing affordable housing and providing housing assistance in the City of Burlington, HASC has an obligation to plan for future growth and develop capital plans accordingly. The communications between HASC and the City's Community Development Department indicate that HASC has not considered projected growth or future housing needs in their capital plans.

- d. Burlington Comprehensive Plan Policy (BCPP) 6.4.1.1 states that all agencies operating in the City of Burlington shall maintain detailed capital plans and that capital plans must (a) cover a period of at least six years, (b) be updated annually, (c) be based on the population and employment projections adopted by the City, and (d) be consistent with the Burlington Comprehensive Plan.
- e. BCPP 6.5.1.1 states that elements of a capital plan related to population or employment growth, such as housing needs, shall be based on, and clearly cite, the City's adopted population and employment projections.
- f. BCPP 6.5.1.3 states that the impacts of projected population and employment growth shall be quantified and any capital improvements necessary to support population and employment growth shall be clearly identified.
- g. The need for affordable housing, and publicly supported housing, in the City of Burlington and Skagit County has been well documented. Skagit County, and the cities in Skagit County, currently have a gap between the number of publicly supported housing units needed and the number of units available. Without an increase in the number of publicly supported housing units, this gap can only be expected to increase with population and employment growth. The housing projects adopted by SCOG illustrate the magnitude of this gap in future years.
- h. On April 28, 2025, the Burlington Community Development Department contacted HASC and requested a capital plan, or any information regarding HASC's future capital needs or projections. HASC responded by providing a six-year capital plan. The capital plan provided by HASC covers a six-year period but does not address the housing needs projections adopted by SCOG.
- i. The Planning Commission finds that although the updated capital plan provided by HASC represents a significant improvement from prior capital plans, it still does not include information on population growth, housing demand, or the need for publicly supported housing, and is therefore inconsistent with BCPPs 6.5.1.1 and 6.5.1.3. However, the Planning Commission also finds that the capital plan supported by HASC represents a step forward in the City's efforts to coordinate capital development programs with HASC, and that this table is sufficient for the limited purposes of issuing permits and development approvals under BCPP 6.4.1.2.b.
- j. Because the capital planning information submitted by HASC does not include information on population growth, housing demand, or the need for publicly supported housing, it is not consistent with BCPPs 6.5.1.1 or 6.5.1.3.

- k. The Planning Commission recognizes that HASC's resources are limited, but at a minimum, a plan should be prepared that clearly identifies existing HASC units, projected future needs, and anticipated financial capabilities. Without this information it is impossible to accurately assess what portion of the City's projected housing needs might be met by HASC.
 - l. The Planning Commission finds that the Housing Authority does not have a conforming capital plan and is not conducting planning activities consistent with the Burlington Comprehensive Plan and Washington State law.
15. The proposed CIP was considered by the Planning Commission at a public hearing public hearing on October 29, 2025.

Recommendation:

Based on the findings presented above the Planning Commission respectfully makes the following recommendations to the City Council:

1. The City Council should adopt the 2026 Capital Improvement Plan (CIP) attached to this recommendation as exhibit "A" subject to the additional recommendations below.
2. The Planning Commission recommends that the City Council formally determine that the following agencies lack conforming capital plans:
 - a. Burlington Edison School District (BESD)
 - b. Housing Authority of Skagit County (HASC)
3. With Respect to BESD, the Planning Commission strongly recommends that the City work to engage BESD in a collaborative planning process for the purpose of sharing information and resources.
4. With respect to HASC, the Planning Commission makes the following recommendations:
 - a. The Planning Commission strongly recommends that the City of Burlington, and its regional partners, continue to push HASC to expand the availability of affordable housing options and increase support for low-income households. Most importantly, consistent with Countywide Planning Policies (CPP) and the priorities developed by the North Star group, HASC should fully engage with other local governments on the planning, development, and funding of new housing for low-income households based on the official housing needs projections adopted by SCOG.

- b. The Planning Commission recommends that the capital plan prepared by HASC be accepted for the limited purpose of issuing permits and development approvals under Burlington Comprehensive Plan Policy 6.4.1.2.b.
5. The Planning Commission recommends that the City Council formally determine that the capital planning materials submitted by the following agencies constitute “conforming capital plans” and fully comply with applicable Burlington Comprehensive Plan policies. The Planning Commission recommends that the capital planning information submitted by these agencies be adopted by reference and considered a part of the 2026 Burlington CIP.
 - a. Diking District 12
 - b. Skagit PUD
 - c. Skagit Area Transit
 - d. Skagit County
 - e. Skagit Valley Community College
 - f. Skagit Regional Transportation Improvement Plan (SCOG)
6. The Planning Commission recommends that the ongoing PROS plan consider future park needs, including, but not limited to, addressing gaps in underserved areas, the feasibility and location of a pump track and pickleball facility, and potential land acquisition needs associated with future park improvements.
7. The Planning Commission recommends that the transportation component of the CIP serve as the City’s six-year transportation planning document (TIP) under the provisions of RCW 35.77.010.
8. The Planning Commission recognizes that the CIP will be used to guide the development of the City’s annual budget and that changes may be necessary as the budget development process moves forward. Accordingly, the Planning Commission recommends that a final CIP, incorporating any changes made during the budget development cycle, be adopted concurrently with the annual budget. Such changes may include amendments to project timing, project assortment, funding sources, or estimated costs as minimally necessary to align the CIP with the City’s budget capacity.

Dated this 29th day of October 2025



Marianne Manville-Ailles
Chair, City of Burlington Planning Commission

Attachments:

"A" 2025 Capital Improvement Plan