



Washington State
Department of
Commerce

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A Guide to the Periodic Update Process for Partially Planning Jurisdictions

LOCAL GOVERNMENT DIVISION
GROWTH MANAGEMENT SERVICES

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Glossary

BAS – Best available science

CAO - Critical Areas Ordinance

CARL – Critical Areas and Resource Lands

CFP – Capital Facilities Plan

City – defined as a city or town, including a code city ([RCW 36.70A.030\(7\)](#))

Commerce – Washington State Department of Commerce (previously named the Department of Community, Trade and Economic Development (CTED) prior to July 2009)

Comprehensive plan - land use document that provides the framework and policy direction to manage where and how growth needs are met. Plan elements address land use, housing, capital facilities, utilities, rural/natural resources, transportation, tribal participation, climate change and other topics.

Development regulations - controls placed on development or land use activities by a county or city, such as codes for zoning, critical areas, planned unit developments and subdivisions.

Fully planning – Refers to those counties and cities that are required or have opted in to plan under [RCW 36.70A.040](#) and must meet all Growth Management Act (GMA) requirements, including adoption of a comprehensive plan and a complete set of development regulations implementing the plan.

GMA – Growth Management Act, [RCW Chapter 36.70A](#)

GMS – Growth Management Services, a unit in the Department of Commerce Local Government Division that helps counties and cities implement the GMA.

MPO – Metropolitan Planning Areas

MRSC – Municipal Research and Services Center

Partially planning –The counties, and the cities within their boundaries that do not meet GMA population and growth rate thresholds and have not chosen to fully plan under the GMA ([RCW 36.70A](#)).

Periodic update – A regularly scheduled review and update of county and city comprehensive plans and development regulations. For most communities, the update takes place every ten years under a schedule established in the GMA by the Legislature.

Public Participation Program – a locally established program to ensure public participation is encouraged early and often, and identifies how all persons who have requested notice of a comprehensive plan update are given notice of the amendments and an opportunity to comment.

RCW – Revised Code of Washington (laws adopted by the state Legislature)

RTPO – Regional Transportation Planning Organizations

Salmonids – includes the Salmonidae family: salmon, trout, chars, freshwater whitefishes, graylings, taimens and lenoks, which are collectively known as the salmonids

SEPA – State Environmental Policy Act

SMA – Shoreline Management Act

SMP – Shoreline Master Program/Plan

STEP – Emergency Shelters, Transitional Housing, Emergency Housing, Permanent Supportive Housing

WAC – Washington Administrative Code (rules adopted by state agencies)

I. Introduction

The Washington State Growth Management Act (GMA), established in 1990, is a series of state laws that requires every county and city in the state to plan for and guide future growth, protect the environment and provide for economic development. The State Legislature “finds that uncoordinated and unplanned growth, together with a lack of common goals expressing the public's interest in the conservation and the wise use of our lands, pose a threat to the environment, sustainable economic development, and the health, safety, and high quality of life enjoyed by residents of this state. It is in the public interest that citizens, communities, local governments, and the private sector cooperate and coordinate with one another in comprehensive land use planning...”¹

Under the GMA, all fully and partially planning counties and cities must review and, if necessary, revise their comprehensive plans and development regulations every ten years through the periodic update process.

Under the GMA, **fully planning** jurisdictions are the state’s faster growing counties and cities, and a number of other counties that have “opted-in” by choice. Currently, there are 28 fully planning counties. These cities and counties must complete all GMA requirements, including adoption of a comprehensive plan with a number of required elements and a complete set of development regulations implementing the plan.

Partially planning jurisdictions are the counties, and the cities within their boundaries that do not meet GMA population and growth rate thresholds to be considered fully planning, or have not chosen to fully plan under the GMA. Currently, there are eleven partially planning counties, listed to the right. **“Non-GMA” jurisdictions is a misnomer.**

While larger and faster growing counties and their cities are required to plan extensively, partially planning counties and their cities are only required to plan for a limited set of regulations explained in [Section III](#).

The Planning Enabling Act ([RCW 36.70](#)) provides a specific statutory framework that integrates planning with zoning, platting and other specific land use regulations. Historically, many partially planning counties developed comprehensive plans under the Planning Enabling Act and many cities followed. Today, the governance of the GMA does not require this of partially planning jurisdictions. **However, those that have**



Who is this guidebook for?

11 counties, and the cities within their boundaries are defined as “partially planning” under the GMA.

- Adams
- Asotin
- Cowlitz
- Ferry
- Grays Harbor
- Klickitat
- Lincoln
- Okanogan
- Skamania
- Wahkiakum
- Whitman

[\(RCW 36.70A.040\)](#)

¹ Growth Management Act Legislative findings [RCW 36.70A.010](#)

adopted and maintain a comprehensive plan must ensure it remains consistent with any forthcoming updates of development regulations such as the Critical Areas Ordinance (CAO) or Shoreline Master Program (SMP).

Many partially planning jurisdictions have limited staff and funds and may have many questions about what the periodic update is and how to get started. This guide is intended as a user-friendly supplement to the GMA statutes and Washington Administrative Codes (WACs) that describe procedures that must be followed and substantive issues that must be addressed.

This guide may not be able to answer all of your questions about the periodic update, but rest assured that Commerce’s Growth Management Services team is available to help! Visit Commerce’s [Growth Management webpage](#) and [Periodic Update webpage](#) for additional resources and contact the [regional assistance planner](#) assigned to your region. Additionally, the new [periodic update checklist for partially planning jurisdictions](#) is available on the periodic update webpage and walks you through each requirement due with the periodic update. Periodic update due dates are shown on the [map in Figure 3](#).

How do I get started?

The periodic update of comprehensive plans and development regulations can be overwhelming. Commerce Growth Management Services (GMS) understands that many partially planning jurisdictions have limited staff and resources. We are eager to help!

We recommend reviewing this guidebook for an overview and reach out to the Commerce regional assistance planner assigned to your jurisdiction early in the planning process and any time during year-round planning efforts.

Your [Commerce regional assistance planner](#) can help:

- Identify and explain in detail what your jurisdiction is required to review and update for the periodic update
- Assist with applying for grants offered by Commerce
- Help develop timelines and benchmarks
- Find contacts within other state agencies that are involved in the process
- Guide you through registering and submitting documents in the PlanView system

II. Periodic update overview

Under the GMA, every county and city in the state is required to conduct a periodic update of their comprehensive plans (if one has been adopted) and development regulations.

Previous revisions to the GMA required that counties and cities complete a periodic update every eight years. Through [House Bill 1241](#) in the 2021-2022 legislative session, counties and cities must take action to review and, if needed, revise their comprehensive plans and development regulations **every ten years after the current 2024-2027 periodic update cycle** to ensure the plan and regulations comply with the requirements of the GMA ([RCW 36.70A.130](#)). [Section III](#) and [Section V](#) of this guide describe in greater detail the requirements and processes for completing the periodic update.

III. What are partially planning jurisdictions responsible for in the periodic update?

Under the GMA, partially planning jurisdictions must review and revise, if necessary, the following as part of the periodic update:

- Critical areas
- Natural resource lands (designation of agricultural, forest and mineral resource lands, if applicable)

The following are the documents, or “deliverables” required to be submitted to Commerce in your periodic update:

- Comprehensive Plan (if one has been adopted by your jurisdiction)
- Critical Areas Ordinance (CAO)
- Natural resource lands designation – this can be submitted as part of a comprehensive plan “land use” chapter, if one has been adopted, or as a stand-alone document and ordinance.

Use the [Periodic Update Checklist for Partially Planning Jurisdictions](#) located on the [periodic update webpage](#) to assist in completion of all required items.

Critical Areas

The GMA requires all counties and cities to adopt development regulations that protect critical areas.² These regulations help to preserve the natural environment, maintain fish and wildlife habitat, and protect drinking water. Protecting critical areas also helps reduce exposure to risks, such as landslides or flooding, and maintains the natural elements of our landscape. It can be costly, or even impossible, to replace critical area functions and values once they are lost. Counties and cities typically adopt these regulations as a **Critical Areas Ordinance (CAO)**. Some cities may be able to adopt their county’s CAO “by reference.” Commerce’s *Critical Areas Handbook* on the [Critical Areas webpage](#) is an invaluable reference and tool for updating and adopting your CAO.

[RCW 36.70A.030\(6\)](#) defines five types of critical areas:

- Wetlands
- Areas with a critical recharging effect on aquifers used for potable water
- Frequently flooded areas
- Geologically hazardous areas
- Fish and wildlife habitat conservation areas

In addition, salmonids play an extremely important role in the ecosystem and are vital cultural and economic resources, therefore jurisdictions must also “give special consideration to conservation and protection measures necessary to preserve or enhance anadromous fisheries.”

² [RCW 36.70A.060](#)

All critical areas must be designated and their functions and values protected using the best available scientific information – known as best available science (BAS).³ Meeting the BAS requirement has been challenging for many jurisdictions. Commerce and other state agencies, including the departments of Ecology and Fish and Wildlife, have published guidance for local communities on how to identify what constitutes BAS for critical areas protection and how local governments can include science in their policies and development regulations. Counties and cities should consult these state agency recommendations for possible changes since their last periodic update. In addition, they should include any other scientific information that may apply directly to their jurisdiction. Visit [Commerce’s Critical Areas webpage](#) and the Municipal Research and Services Center (MRSC) [Critical Areas webpage](#) for guidebooks and other resources to help with the CAO.

Natural Resource Lands

Designated under [RCW 36.70A.170](#), natural resource lands are agricultural (not already characterized by urban growth), forest and mineral lands that have long-term significance for the commercial production of food, agricultural products, timber, or for the extraction of minerals. All local governments in Washington State must determine where natural resource industries, including forestry, agricultural, mining and fisheries industries can productively operate.

If a partially planning jurisdiction chooses to adopt regulations that support a comprehensive plan, those regulations may not prohibit uses legally existing on any parcel prior to their adoption. Such regulations shall assure that the use of lands adjacent to agricultural, forest or mineral resource lands shall not interfere with the continued use, in the accustomed manner and in accordance with best management practices, of these designated lands for the production of food, agricultural products, timber, or for the extraction of minerals.

Minimum guidelines to classify resource lands are codified in [WAC 365-190](#). Please also review [RCW 36.70A.060](#) “Natural resource lands and critical areas – Development regulations” and visit [Commerce’s Natural Resource Lands webpage](#) for additional guidance to get started.

Although not periodic update “deliverables,” local governments must implement the following throughout the review process, where applicable:

State Environmental Policy Act (SEPA)

The State Environmental Policy Act (SEPA) was enacted in 1971 to provide state and local agencies with the authority to consider and mitigate the environmental impacts of their decisions. Although SEPA was adopted prior to other planning laws, it is still an important aspect of land use planning because it applies to all agency decisions unless they are categorically exempt. SEPA is intended to provide information to agencies, applicants and the public to encourage the development of environmentally sound proposals. The environmental review process involves the identification and evaluation of probable environmental impacts, the exploration of reasonable alternatives that would mitigate adverse impacts and the development of mitigation measures to reduce those impacts.

Every step of the planning process, including adoption of countywide planning policies (if applicable), comprehensive plans and development regulations, and project review requires environmental analysis.

³ [RCW 36.70A.172](#)

Whether a county or city is fully or partially planning under GMA, it should be examining the environmental impacts of its planning decisions. Environmental information is essential to making good planning decisions.

Recent amendments to the GMA and SEPA now require that the environmental review and permit review processes be better integrated at the project level. It is important to note that the Legislature has expressly stated that the primary role of SEPA review is to focus on the gaps and overlaps that may exist in applicable laws and requirements related to a proposed action. SEPA is not intended to act as a substitute for other land use planning and environmental requirements. Visit [Ecology's SEPA webpage](#) for complete SEPA guidance.

Use of Best Available Science (BAS)

State law requires that in designating and protecting critical areas in the state, counties and cities must include best available science (BAS) in developing policies and development regulations to protect the functions and values of critical areas. The inclusion of BAS in the development of critical areas policies and regulations is especially important to salmon recovery efforts and to other decision-making affecting threatened or endangered species. Washington Administrative Code ([WAC](#)) [365-195-900 through 925](#) are intended to assist counties and cities in identifying and including BAS in newly adopted policies and regulations, in this periodic review and evaluation, and in demonstrating they have met their statutory obligations under [RCW 36.70A.172\(1\)](#).

Consultation with state and federal natural resource agencies and tribes can provide a quick and cost-effective way to develop scientific information and recommendations. State natural resource agencies provide numerous guidance documents and model ordinances that incorporate the agencies' assessments of BAS. Commerce can provide technical assistance in obtaining such information from state natural resource agencies, developing model GMA-compliant critical areas policies and development regulations, and related subjects. Commerce will make available to interested parties a current list of BAS determined to be consistent with the following criteria in [WAC 365-195-905](#):

- Characteristics of a valid scientific process
- Peer review
- Methods used to obtain the information
- Logical conclusions and reasonable inferences
- Quantitative analysis
- Information placed in proper context
- References cited to relevant, credible literature and other pertinent existing information
- Common sources of scientific information
- Common sources of nonscientific information

A county or city may compile scientific information through its own efforts with or without the assistance of qualified experts, through state agency review and the GMA's required public participation process. The county or city should assess whether the scientific information it compiles constitutes BAS applicable to the critical areas to be protected, using the criteria set out in [WAC 365-195-900 through -925](#) and any technical guidance provided by Commerce. If not, the county or city should identify and assemble additional scientific information to ensure it has included BAS. It is recommended that local governments check Commerce's [Update EZ View site](#) for potential updates to WAC 365-195 (BAS) during planning efforts for the 2024-2027 update cycle.

Tribal Participation in Planning

Federally recognized Tribes retain their rights since time immemorial and are as such inherently sovereign. Federally recognized Tribes have a unique trust relationship with the United States federal government as a result of treaties, legislation, and Executive Orders. Their status as sovereign nations entitles them to a direct government-to-government relationship with the Federal Government, independent of the states or local jurisdictions where these Tribes may reside.

Tribal communities have been the stewards of the lands of Washington State since time immemorial. Washington State has an established government-to-government relationship with Indian tribes and in 1989, the 29 federally recognized tribes and the State of Washington signed the [Centennial Accord](#). This made Washington State and the tribes historically the first in the nation to establish a relationship to strengthen tribal government-to-government relations on issues of shared interests and to promote collaborative best management practices. The Department of Commerce respects their continued stewardship and actively works to honor their tribal sovereignty by engaging in meaningful government-to-government work as illustrated by the Centennial Accord.

Under the GMA, tribes are partners in the planning process through tribal engagement, a parallel track to public participation, project noticing requirements and critical area development.⁴ [HB 1717](#) was passed in the 2021-2022 legislative session, bringing new requirements for better collaboration with tribes in the planning process. Please see [Figure 1](#) below for a map of the “Federally Recognized Tribes of Washington State.” Also review the RCWs in the footnote below⁵, [HB 1717](#) and visit the Washington State [Governor’s Office of Indian Affairs webpage](#) and Commerce’s [Tribal Planning Coordination under the Growth Management Act webpage](#) for further resources. These policies can be included as a chapter in the comprehensive plan if one has been adopted.

Figure 1. Federally Recognized Tribes of Washington State



⁴ [RCW 43.376](#) and [RCW 36.70A.035, 050, 210, 710, 715](#) and [720](#)

⁵ [RCW 43.376](#), [RCW 36.70A.035](#), [RCW 36.70A.040](#), [RCW 36.70A.210](#), [RCW 36.70A.710](#), [RCW 36.70A.715](#) and [RCW 36.70A.720](#)

IV. Additional Requirements for Partially Planning Jurisdictions

The GMA calls out additional requirements for partially planning cities and counties with varying due dates. These requirements described below are not due with the periodic update, but Commerce encourages local governments to review and consider adding them into the periodic update budget, schedule and work plan.

- STEP – Emergency Shelters, Transitional Housing, Emergency Housing, Permanent Supportive Housing
- Siting of organic materials management facilities
- Shoreline Management Act (SMA) (where applicable)
 - **Note:** a Shoreline Master Program/Plan (where applicable) is not required to be submitted with the periodic update, although compliance with the SMA at time of periodic update submittal is required. See the [Shoreline Management Act section](#) below for more information.

These requirements are included in the [Periodic Update Checklist for Partially Planning Jurisdictions](#) located on the [periodic update webpage](#).

STEP: Emergency Shelters, Transitional Housing, Emergency Housing, Permanent Supportive Housing

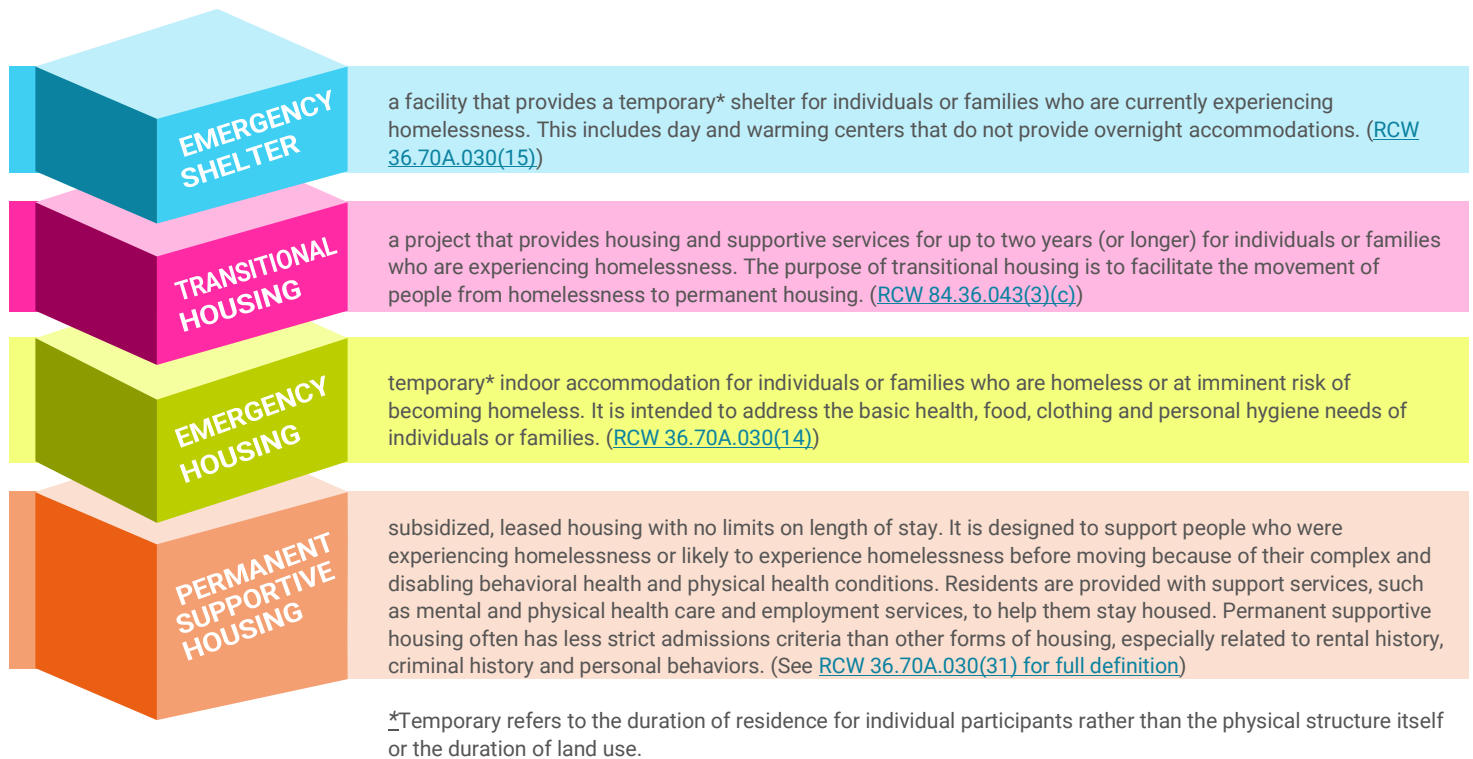
From 2007 to 2013, as rent prices surged and vacancy rates decreased, Washington experienced a dramatic increase in people experiencing homelessness. In 2021, Washington made changes to its state planning framework to address the need for more housing, including STEP. Communities are required to plan for these housing types so that our most vulnerable households can have a better chance to access the housing they need.

STEP requirements for partially planning jurisdictions:

- Cities cannot prohibit **transitional shelter or permanent supportive housing** in zones where hotels or residences are allowed. [RCW 35A.21.430](#)
- Cities cannot prohibit **indoor emergency shelter or housing** in any zone that allows hotels unless the city allows shelters within a mile of transit in most zones. [RCW 35.21.683](#)
- **A city or county** cannot adopt moratoriums for STEP housing permits. [RCW 36.70A.390](#)

If a comprehensive plan has been adopted, this can be submitted as part of a “housing” chapter, or as a stand-alone document and ordinance. If a jurisdiction implements restrictions on the STEP types (for example: occupancy, spacing or intensity of use), an analysis demonstrating that the jurisdiction has sufficient land capacity, given these restrictions, will be required.

Figure 2. Definitions of STEP types



Siting of Organic Materials Management Facilities

For partially planning cities, development regulations to implement comprehensive plans under [RCW 35.63.100](#) that are newly developed, updated, or amended after January 1, 2025, must allow for the siting of organic materials management facilities in the areas identified by the county in which the city is located under [RCW 70A.205.040\(3\)\(a\)\(i\)](#) to the extent necessary to provide for the establishment of the organic materials management volumetric capacity identified under [RCW 70A.205.040\(3\)\(a\)\(ii\)](#).

If a comprehensive plan has been adopted, this can be submitted as part of a “Land Use” chapter, or as a stand-alone document and ordinance. See also: [RCW 35.63.290](#) and [RCW 35A.63.310](#).

Shoreline Management Act (SMA) (where applicable)

The Shoreline Management Act of 1971 (SMA) ([RCW 90.58](#)) is intended to protect the ecological functions of shorelines of the state, plan for water-dependent uses and for public access. **The SMA applies to all 39 Washington counties and 250 cities with stream, river, lake or marine shorelines.** These shorelines include:

- All marine waters
- Streams and rivers with greater than 20 cubic feet per second mean annual flow
- Lakes 20 acres or larger
- Upland areas called shorelands that extend 200 feet landward from the edge of these waters
- Biological wetlands and river deltas connected to these water bodies
- Some or all of the 100-year floodplain, including all wetlands

The SMA states that the interests of all the people "shall be paramount in the management of shorelines of statewide significance."

These special shorelines include:

- Pacific Coast, Hood Canal and certain Puget Sound shorelines
- All of Puget Sound and Strait of Juan de Fuca
- Lakes or reservoirs covering at least 1,000 surface acres
- Larger rivers: those flowing 1,000 cubic feet per second or more in western Washington and 200 cubic feet per second and greater in eastern Washington
- Wetlands associated with all the above



The SMA requires local governments with these shorelines to adopt a Shoreline Master Program (SMP), which identifies regulated shorelines and shorelands within their jurisdiction, permitted uses and policies guiding those uses. The GMA includes a planning goal for shoreline management, established in [RCW 36.70A.020](#) "Planning Goals." The GMA considers the goals and policies of the SMA to be an element of county and city comprehensive plans. The shoreline element is typically addressed in a separate document known as the Shoreline Master Program/Plan (SMP), but counties and cities have the option to include these requirements as a shoreline element within the comprehensive plan, if one has been adopted by partially planning jurisdictions.

The review and update of an SMP is conducted on a ten-year cycle similar to the periodic update cycle of comprehensive plans and development regulations. The SMP is due five years after the periodic update. **Although the SMP is not due with your periodic update, the comprehensive plan, development regulations and SMP must all be internally consistent at time of periodic update submittal to Commerce.**

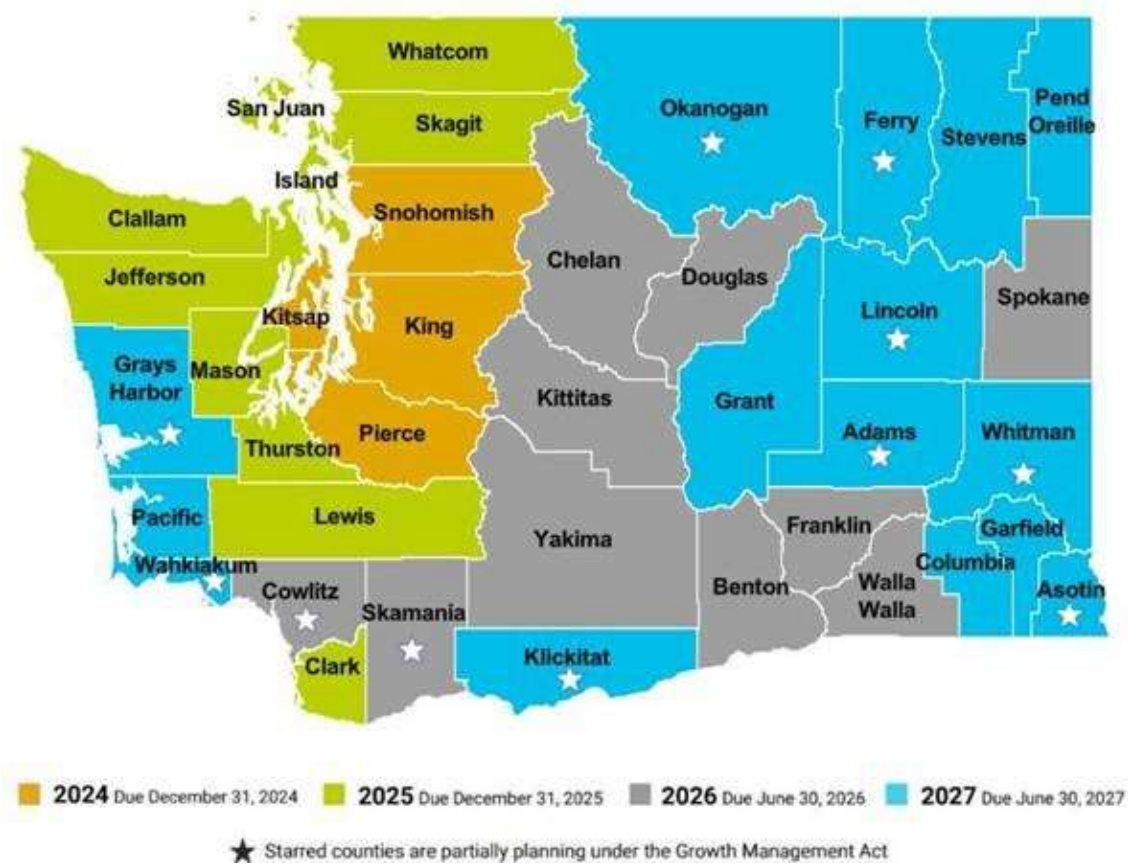
The Department of Ecology (Ecology) must approve all SMPs and ensure they are consistent with state policies and guidelines. For more information, see [Ecology's Shoreline Management Act](#) and [Shoreline Management](#) webpages.

V. Periodic update frequently asked questions

When is the update due?

The Legislature has established a deadline schedule for periodic updates in [RCW 36.70A.130](#). Except for certain small and slow-growing jurisdictions that may be eligible for an extension, each county and its cities must complete the periodic update by the dates shown in Figure 2 and every ten years after that. See [Section V: The Review and Update Process](#) of this guidebook for steps to complete the update. Once partially planning jurisdictions have completed their periodic update in their designated years of either 2026 or 2027 (Figure 3), their next periodic updates will be due in 2036 and 2037, respectively.

Figure 3. Periodic Update Schedule for Fully & Partially Planning Counties



Are there deadline extensions?

Yes. All cities and counties are eligible for one-year extension (twelve months) to make *substantial progress* toward completing development regulations that protect critical areas (i.e. critical areas ordinance (CAO)).⁶ During this period, the jurisdiction will remain eligible for state grants and loans without being ineligible due to non-compliance with the update deadline. Please see CAO requirements in the [Periodic Update Checklist for Partially Planning Jurisdictions](#) and visit Commerce’s [Critical Areas webpage](#) for further information.

“Substantial progress” is defined in statute as being no more than one year after the statutory deadline. Technically, the deadline did not change, but jurisdictions will not be listed as out of compliance for the purposes of grants and loans if the CAO update is not complete within the first twelve months after the statutory update deadline.

Smaller and slower growing cities and counties (defined in the text box on the next page) have an additional two years from the dates shown in [Figure 3](#). However, the two different deadline extensions are separate and both are calculated from the jurisdiction’s statutory deadline. If the jurisdiction is eligible and takes the two-year extension, that extension applies to the entire comprehensive plan and development regulations update. **The one-year extension for development regulations protecting critical areas cannot be added to the two-**

⁶ [RCW 36.70A.130 \(7\)\(a\) and \(b\)](#)

year extension date. To determine extension eligibility and for assistance with approaching deadlines or overdue periodic update submittals, local jurisdictions should contact their Commerce [regional assistance planner](#).

Commerce is tracking the periodic update and compliance for all jurisdictions. Please keep your Commerce regional assistance planner informed of your progress. No formal application is required and no discretionary action by Commerce is needed.

Can a jurisdiction complete the update early?

Yes. Any county or city may complete the periodic update process before its deadline.⁷ The deadline for its next periodic update would still remain ten years from the original deadline established in the GMA; with a planning horizon extended twenty years from the periodic update deadline. For example, if a jurisdiction has an update deadline of June 30th 2026, but it completes its update in 2025, then it would not be subject to another required periodic update until 2036. In this example, the planning horizon of the updated comprehensive plan would extend a total of 21 years to 2046: 20 years from the periodic update deadline.

Note: To help alleviate any confusion, Commerce recommends that the final legislative action taken upon completion of the periodic update process clearly note the *early adoption* and the due date of the next scheduled periodic update according to statute.

What's new for the 2024-2027 periodic update cycle?

Amendments to the Growth Management Act

The primary purpose of the periodic update is to ensure local plans and regulations are consistent with recent changes to state law and updates to countywide planning policies (if applicable). Although the basic structure of the GMA has remained intact over the years, the state legislature has amended it frequently. Please visit [Commerce's Growth Management Act Laws and Rules webpage](#) and [EZ View site](#) to stay informed on the WAC updates. The Laws and Rules webpage also includes a very helpful document that summarizes all new GMA legislation: [Growth Management Act Amendments 1995-2024](#). Most legislative

What is a small or slow-growing jurisdiction?

A **county** with a population of no more than 50,000 and a growth rate of no more than seventeen percent in the ten years preceding the deadline established in [RCW 36.70A.130\(5\)](#).

A **city** with a population of 5,000 or less and has had its population increase by the greater of either no more than one hundred persons or no more than seventeen percent in the ten years preceding the deadline established in [RCW 36.70A.130\(5\)](#).

Growth rates are measured using the ten-year period preceding the regular due date. See [RCW 36.70A.130 \(6\)\(e\) and \(f\)](#)

Population is taken from the Washington State Office of Financial Management (OFM) [annual population estimates](#), which is released in June of each year, reflecting counts on April 1st. A county or city will not know for certain what their population is until nine months before the statutory deadline. If a jurisdiction is close, or expects any large annexations close to the due date, the population information should be monitored closely. **Commerce can help you make this determination.**

⁷ [RCW 36.70A.130\(6\)\(a\)](#)

changes in the aforementioned document only apply to jurisdictions that fully plan under RCW 36.70A.040, but may be of interest to partially planning jurisdictions for future implementation. Additionally, stay tuned to the [Periodic Update webpage](#) for workshops, recordings, checklists and other resources. This webpage includes the [Periodic Update Checklist for Partially Planning Jurisdictions](#). The checklist will be updated as new legislation affecting partially planning jurisdictions is passed in future legislative sessions.

Annually, jurisdictions are required to consider requests to amend the comprehensive plan, referred to as “docketing” of amendments. If jurisdictions receive annual amendment requests during the periodic update process, those requests should be considered as part of the periodic update and not processed separately. When doing so, it is crucial to emphasize that the amendments include periodic update review as established in the public participation program (described in Section V), including notices for public hearings and legislative action(s). It’s important to note, Hearings Board cases have faulted jurisdictions for not informing the public about what actions are related specifically to the periodic update.

VI. The review and update process

Some partially planning jurisdictions have chosen to include a comprehensive plan or additional development regulations in their planning efforts, although not required under the GMA. Historically, many partially planning jurisdictions implemented a comprehensive plan when it was required under the Planning Enabling Act.

Currently, under the GMA, partially planning jurisdictions are not required to create a comprehensive plan. If a comprehensive plan has been adopted by a partially planning jurisdiction, it must be reviewed and updated to maintain consistency with all of the items described above in [Section III](#) and [Section IV](#).

To assist you with the periodic update, this section includes steps to help guide you start-to-finish. Application of the following steps should be scaled to the capacity, time and resources of your jurisdiction. Please note that the following list of steps is not intended to be exhaustive and some of the steps may not be relevant to your jurisdiction. The steps are shown in numbered-order, but many can be worked on concurrently throughout the process. Working alongside local staff, agencies and your community is essential for a thorough and transparent periodic update process. Please contact your [Commerce regional assistance planner](#) for additional guidance to get started.

1. Create a work program

Before undertaking the update, it is helpful for county and city staff to establish a work program that outlines the entire periodic update process. See the [Periodic Update webpage](#) for an example work program. Commerce encourages local governments to complete a checklist when designing a work program for the update. As a required component of the periodic update, counties and cities must establish a program that identifies procedures and schedules for the public to participate in the periodic update.⁸ The program should clearly identify the scope of the review and identify when legislative action on the review and update component are proposed to occur. Counties and cities must ensure that notice of the update process is broadly and effectively disseminated.⁹

⁸ [RCW 36.70A.035](#) and [130\(2\)\(a\)](#)

⁹ [RCW 36.70A.035](#)

The program must also provide for *early and continuous public participation*.¹⁰ The best way for a county or city to complete this requirement is to publish a complete public participation program (see step 4) or schedule at the beginning of the update process. However, it is not required that a county or city establish the entire schedule at the beginning of the process, as long as a program is established and effective notice is provided for all steps.

2. Initiate county-city collaboration

At least two years prior to the update and continuously throughout the process, county-city collaboration is crucial. Local governments must coordinate on regional issues such as protection of critical areas and shorelines.

Completion of the periodic update may result in changes to spatial data and zoning maps. It is important to coordinate with staff, consultants and affected agencies early in the process to ensure all maps are updated and available for use once the periodic update is adopted and codified.

3. Begin review of existing regulations

The GMA does not exempt any portion of a comprehensive plan or any development regulations from being subject to review and evaluation. However, local governments may use common-sense factors in determining the level of review, taking into account when the plan and regulations were adopted and whether and how the GMA has been amended in the intervening time.

The [periodic update checklist for partially planning jurisdictions](#) and this guidebook should be the foundation of your review. The checklist provides a concise summary of the GMA requirements.

Filling out the checklist will help compare your local plan and regulations against the latest requirements, determine what needs to be reviewed in greater detail, and identify what may need to be added, deleted, and amended in plans and codes to maintain compliance with the GMA.

Early in the process, counties and cities may elect to adopt an ordinance or resolution after reviewing and analyzing what will be updated and determining the scope of changes needed. This is a formal way to let the public know early “what is on the table” as part of the update. It also may help in limiting appeals later on. See examples of legislative actions establishing the scope of an update on the [Periodic Update webpage](#).

4. Develop a public participation plan

“Effective community engagement practices create a vehicle for participatory local democracy by giving members of the public the opportunity to become directly involved in guiding policy decisions that will shape the future of their community. Meaningful engagement that is based upon a two-way communication process between the public and their elected community leaders can play an important role in efforts to restore and

¹⁰ [RCW 36.70A.140](#)

build trust in government. Community engagement and outreach programs will also be key components of any efforts by local governments to address social equity and inclusion.”¹¹

Local jurisdictions may want to formally adopt the public participation program by resolution or ordinance to formalize the update process and help to meet the GMA requirements for early and continuous public involvement. A public participation plan can be adjusted over time if needed. The GMA provides that “errors in exact compliance with the established program and procedures shall not render the comprehensive land use plan or development regulations invalid if the spirit of the program and procedures is observed.”



Participation levels typically range from **inform, consult, involve, and collaborate, up to empower**. The engagement frameworks are usually presented in a matrix, which can be helpful in deciding on the types of meeting formats and engagement techniques that may be best suited for specific engagement needs and objectives. There are no one-size-fits-all approaches to community engagement efforts. Local governments have a range of options and methods from which they can choose depending upon their particular needs and circumstances.

New and rapidly evolving **communications technologies** are creating more ways for local governments to connect and engage with the public through remote meetings, email and text alerts, social media, mobile apps and more. More people are online today and local governments that take advantage of digital technologies will be more effective at engaging with them.”¹²

Workshops, open houses and public hearings on draft iterations are crucial to a successful and **transparent** periodic update process. Local staff should provide opportunities for the public to participate in ideas for the future of their community and weigh-in on choices that may or may not be compatible with priorities or visions for the future. Public meetings can be a challenge to initiate and regulate. Most jurisdictions employ **Robert’s Rules of Order** to effectively conduct public meetings. Other recommended resources for engaging the public and conducting proper public meetings include: Commerce’s Short Course¹³ document on **“Effective Meetings for Appointed and Elected Officials** and **MRSC’s citizen’s guide to public meetings document**.

Partnerships with state agencies should also be initiated early in the process. In addition to Commerce, many state agencies are stakeholders in updates made to local comprehensive plans and development regulations. For example, agencies such as the departments of Ecology and Fish & Wildlife may have interests in draft changes to critical area codes and the departments of Transportation and Health may want to participate in analysis of utilities and essential public facilities elements. Commerce recommends including state agencies

¹¹ [RCW 36.70A.140](#)

¹² MRSC “Community Engagement Resources” <https://mrsc.org/Home/Explore-Topics/Governance/Citizen-Participation-and-Engagement/Community-Engagement-Resources.aspx>

¹³ More information about Commerce’s Short Courses on Local Planning can be found [here](#).

early and often in development of a community engagement plan to ensure adequate time for research and analysis prior to the review during the 60-day comment period.

For additional guidance, see Commerce’s [Quick Guide to Washington State Agencies guidebook](#), Commerce’s [Periodic Update webpage](#) for examples of public participation programs, MRSC’s [Community Engagement Resources](#) document and [WAC 365-196-600](#).

5. Conduct SEPA environmental review & checklist

The State Environmental Policy Act (SEPA), [RCW 43.21C](#), requires all governmental agencies to consider the environmental impacts of a proposal before making decisions. Ecology is responsible for overseeing rules that implement SEPA. The environmental review process involves the identification and evaluation of probable environmental impacts and the development of mitigation measures that will reduce adverse environmental impacts. Please review Ecology’s [SEPA Guidance](#) and [State Environmental Policy Act Handbook](#) and contact your [regional Ecology office](#) to get started.

6. Draft staff reports and maps

Staff reports and supporting documents such as maps, exhibits and individual studies are required elements in the periodic update. They must be legally defensible, factual and easy to understand. Staff reports join all of the information of the process, findings of fact, stakeholder resources, conclusions, etc. into a transparent and complete document for the public record. It may be helpful to draft a staff report outline early on to help guide staff through documentation of the process. Tips for writing an effective staff report can be found on [MRSC’s website](#).

7. Issue public notices

Public notices are required and are essential to the periodic update process allowing for an **inclusive and transparent** path to successfully-adopted plans. Public notices for proposed updates to comprehensive plans and development regulations must be issued in designated legal publications ([RCW 65.16](#)) and may be issued on other platforms such as social media outlets authorized by the local jurisdiction. Publishing environmental review under SEPA is required and can be issued as a separate noticing period or in conjunction with the public notice of the project. Check your local adopted policies prior to issuing public/SEPA notices.

8. Make SEPA determination

After conducting environmental review and meeting the requirements for public notice, a local jurisdiction must make a SEPA determination in accordance with policies established by Ecology. Following local approval of draft changes required by the periodic update, some local governments choose the SEPA/GMA integrated comment period which aligns with Commerce’s 60-day notice requirements. Review your local policies regarding SEPA review and noticing.

Please review Ecology’s [SEPA Guidance](#) and [State Environmental Policy Act Handbook](#) or contact your [regional Ecology office](#)

9. Submit notice to Commerce for 60-day review

Each county and city planning under the GMA is required to notify Commerce Growth Management Services (GMS) when adopting or permanently amending its comprehensive plan and/or development regulations. State agency notice must be submitted to Commerce **at least sixty (60) days prior** to the scheduled final adoption by the local government. The purpose of this notice requirement is to allow Commerce, tribes and other state agencies the opportunity to participate during the public review process and may provide comments on the proposed changes. For more information on this notice requirement, please see [RCW 36.70A.106](#) and [WAC 365-196-630](#).

Notice of intent to adopt an amendment under the GMA is a statutory procedural requirement. It should be in writing and include, at a minimum:

- A copy of the proposed amendment text; and
- A description of the amendment, the local government contact person, the contact phone number and address, and proposed adoption date; and
- Completed Commerce [Periodic Update Checklist for Partially Planning Jurisdictions](#) (this is the first deliverable under your periodic update grant. Submittal is not required if not applying for Commerce grants); and
- Completed Commerce [Critical Areas Checklist](#) (only required if applying for a grant through Commerce and using some of those funds to update a CAO); and
- Transmission to Commerce, Growth Management Services online via the [PlanView Data System](#) or by email: reviewteam@commerce.wa.gov

Please note:

Documents such as noticing flyers, adoption announcements or SEPA materials, when submitted alone, **do not** represent adequate 60-day notice of intent to adopt because they fail to provide sufficient materials for Commerce, tribes and other state agencies to review and provide comment.

Commerce no longer accepts paper copies of submittals.

10. Take legislative action

Adopt an ordinance or resolution finding that a review has occurred and that identifies revisions made or concludes that revisions were not needed ([RCW 36.70A.130\(1\)\(b\)](#)). Follow your local policies and processes for preparing and taking legislative action. See examples of resolutions of adoption along with examples of adopted comprehensive plans and development regulations on the [periodic update webpage](#).

If there are no challenges to the scope of revisions within 60 days after the legislative action, challenges to the jurisdiction's final ordinance will be limited to the subjects defined in that final ordinance.

11. Submit notice of adoption to Commerce and publish updates

Submit a copy of the signed adopted ordinance or resolution to Commerce, Growth Management Services **not more than ten days after adoption** ([RCW 36.70A.106](#)).

If applying for periodic update grants, jurisdictions must submit their completed checklist(s) as the first deliverable. Completed checklists also help Commerce planners provide more informed technical assistance

across the state. Please contact the [regional assistance planner](#) assigned to your area any time throughout the process. Work with your department and code publishing service to codify and publish the updates.

VII. Periodic Update Grants

The governor and Legislature have made a historic commitment to GMA planning during recent legislative sessions. As a result, Commerce expects to provide grant funding to all counties and cities during their periodic update (2024-2027 cycle).

Grant timelines and requirements

Grants will be awarded to counties and cities based on their scheduled deadlines under [RCW 36.70A.130\(5\)](#), with funding available two years before these statutory deadlines for review and revision of comprehensive plans and development regulations.

Periodic update grant award notifications and instructions will be issued to counties and cities at least two years before the cycle year (see the cycle deadlines in [Figure 3](#)). Commerce will work with you to finalize the grant agreements. Jurisdictions will be eligible to request grant reimbursement for all periodic update grant work, defined in upcoming grant agreements.

Grants are available to counties and cities based on fully planning or partially planning status under the GMA, as well as population.

Periodic update grants are available under the following formula:

Partially Planning	
• Counties with 10,000 population and over	\$150,000
• Counties under 10,000 population	\$100,000
• Cities (No population limits)	\$20,000

See the [Growth Management Grants webpage](#) for more information on GMA grants, including middle housing and climate program grants.

VIII. Additional Considerations

Items described in this section are not required for partially planning jurisdictions, but may help guide future planning goals and community interests.

Comprehensive plan optional elements

A comprehensive plan may include additional elements (such as capital facilities or a parks and recreation plan, described below), subarea plans, or studies dealing with subjects relating to the physical development within a jurisdiction. Optional elements may include, but are not limited to: housing needs, climate change mitigation and resiliency, or community-based behavioral health facilities. These and other optional elements

can be separate elements in a comprehensive plan, integrated into mandatory elements or part of a subarea plan.

Please reference [RCW 36.70A.080](#) and visit Commerce's [Growth Management webpage](#) for additional topics and resources.

Planning for housing

Shelter is the most basic of human needs. When people can secure stable and affordable housing near locations of jobs and opportunity they are able to focus on achieving other life goals, such as education, career advancement, health and wellness, or raising a family. Without stable and affordable housing, residents face significant and sometime insurmountable challenges to achieving these goals.

Many aspects of the housing market are out of the control of local jurisdictions, however, there are actions that a city or county can take to allow, encourage, direct, and support the development of new housing or preservation of existing stock, although not required for partially planning jurisdictions. With an unpredictable housing crisis and racially disparate impacts in housing, we encourage fully *and* partially planning counties and cities to explore [Commerce's Planning for Housing webpage and related links](#) and consider addressing any local housing needs and regulations. Regulations governing STEP housing are the only housing regulations required of partially planning jurisdictions at this time.

Voluntary Stewardship Program (VSP)

The Voluntary Stewardship Program (VSP) was signed into state law in 2011 and provides an additional tool to **counties** to protect critical areas where agricultural activities are conducted. Twenty-seven of the state's 39 counties opted into the VSP. The VSP is administered by the Washington State Conservation Commission (SCC), the coordinating state agency for all 45 conservation districts (CDs) in Washington State. Together, the SCC and CDs provide voluntary, incentive-based programs that empower people to practice conservation and ensure healthy natural resources and agriculture for all.

The SCC administers the program with guidance from a statewide advisory committee and technical panel. SCC allocates funds and supports counties in developing incentive-based strategies and local guidelines for watershed stewardship. The program relies on continued funding from the Washington State Legislature.

The Washington State Conservation Commission:

- Provides financial and operational support and oversight to our state's 45 conservation districts
- Designs policy and program structures that can be customized to address site-specific natural resource conditions and landowner needs
- Facilitates collaborative solutions that meet state natural resource priorities and work on the ground
- Support local governments to make land use changes that preserve farmland
- Promote the use of voluntary, incentive-based practices instead of regulation to protect critical areas while maintaining agricultural viability
- Encourage local government engagement with your local conservation district as the entity with the skills, knowledge and expertise to engage local landowners

The Commission has a number of programs that can assist local jurisdictions in their planning efforts. Two include the [Voluntary Stewardship Program](#) (described above) and the [Office of Farmland Preservation](#).

See the [Washington State Conservation Commission VSP webpage](#) for detailed program information.

Capital facilities planning

Although not required of partially planning jurisdictions, planning for capital facilities is critical in the process of designating or expanding UGAs. Too often, GMA Capital Facilities Plans have been prepared as an afterthought, rather than as an integral part of the planning process. Visit [MRSC's site](#) for capital facilities resources.

Capital facilities plans can help jurisdictions use limited funding wisely and most efficiently to maximize funding opportunities. By planning ahead to identify what each capital facilities' needs are, including operation and maintenance, local planners and elected officials can prioritize projects, coordinate related projects, and apply successfully for loan and grant opportunities.

What does a capital facilities plan include?

- An inventory of existing capital facilities owned by public entities, showing the locations and capacities of the capital facilities;
- A forecast of the future needs for such capital facilities;
- The proposed locations and capacities of expanded or new capital facilities;
- At least a six-year plan that will finance such capital facilities within projected funding capacities and clearly identifies sources of public money for such purposes, often referred to as the Capital Improvement Plan, or the financing implementation plan that is tied to the Budget; if a capital improvement is not listed in the CIP or CFP, it should not be prioritized for funding.
- A requirement to reassess the land use element, and future land use patterns, if probable funding falls short of meeting existing needs and to ensure that the land use element, capital facilities plan element, and financing plan within the capital facilities plan element are coordinated and consistent. If developing plans for parks and recreation facilities, they must be included in the capital facilities plan element.¹⁴

Note: Recent updated requirements to addressing nutrients at Puget Sound wastewater treatment facilities, as identified in Ecology's General Permit, should be considered when updating the Capital Facilities Plan, where applicable.

Planning for parks & recreation

"The GMA charts a new course for Washington communities that has tremendous implications for parks, recreation and open space planning. The GMA promotes wise use of limited land and resources which helps conserve open space. It aims to reverse the trend toward converting undeveloped land into sprawling, low-

¹⁴ Commerce's Capital Facilities Guidance: <https://www.commerce.wa.gov/serving-communities/growth-management/growth-management-topics/capital-facilities-planning/>

density land use that represents a threat to open space in this state. The GMA also encourages the enhancement of recreational opportunities for the enjoyment of Washington citizens. It calls for the development of parks and recreation facilities, which adds to the quality of life in communities throughout the state.”¹⁵

Local communities may identify what public park and recreation facilities and services are most important to them and what quantity is needed. To determine adequacy, communities should consider developing standards to measure whether adequate provisions have been met or are needed. In addition, local jurisdictions should be able to estimate what the future demand will be and to decide what new land area and facilities must be added to meet the needs of a growing and/or changing population.

Although guidelines are available, it is up to local communities to determine what standards are right for their community. To learn more, please visit [MRSC’s Park Planning, Design, and Open Space webpage](#) for various resources and examples of local design standards, guidelines and park plans.

Coordination with military bases

When developing and updating comprehensive plans and development regulations, analysis for compatibility with area military bases and ranges is essential.

The GMA [RCW 36.70A.530](#) cites the military’s significant role in the economy and declares a state priority to prevent incompatible development near military installations. Incompatible development also poses health and safety concerns for neighboring community members and military personnel operating or training.

Ongoing communication and collaborative planning is critical to understanding civilian-military interests in the landscape they share. Since 2015, Commerce has developed supportive resources for coordinated planning to help address the unique needs of areas around military bases and ranges. Please visit Commerce’s [Civilian-Military Land Use Compatibility webpage](#) and [Defense Community Compatibility Account webpage](#) for further information.

Environmental Justice

Environmental Justice is defined in the Growth Management Act ([RCW 36.70A.030\(16\)](#)) as the fair treatment and meaningful involvement of all people regardless of race, color, national origin or income with respect to the development, implementation and enforcement of environmental laws, rules and policies. Environmental justice includes addressing disproportionate environmental and health impacts in all laws, rules and policies with environmental impacts by prioritizing vulnerable populations and overburdened communities, the equitable distribution of resources and benefits and eliminating harm. All Washington residents, regardless of income, race, ethnicity, color or national origin, have a right to live, work and recreate in a clean and healthy environment. Low-income communities, communities of color and indigenous people in Washington and across the country often bear the brunt of pollution and the environmental and health impacts of historic and ongoing inequitable land use practices. When working on the periodic update, jurisdictions should approach the work through an environmental justice lens: working to identify and address disparities in environmental

¹⁵ [“Planning for Parks, Recreation and Open Space in Your Community,”](#) WA State Dept. of Commerce and The Interagency Committee for Outdoor Recreation, February 2005

quality, exposure to pollution, and access to green spaces, and engaging voices from historically underrepresented communities in decision-making processes to ensure their concerns are heard and incorporated into planning initiatives. This is especially critical when designing and implementing public participation plans. Efforts should be made to avoid creating or worsening environmental health disparities. By integrating principles of environmental justice into planning practices, we can advance social equity and environmental sustainability for present and future generations.

IX. Learn More



Mount St. Helens. Johnston Ridge Observatory

The Washington State Department of Commerce and partner-agencies offer a variety of online resources and training opportunities to help with all planning topics and offer insight into the processes of local government.

The Periodic Update Workshop Series (free to attend):

For each upcoming year leading into the 2024-2027 periodic update cycle, Commerce and partner-agencies will be hosting webinar series to help

counties and cities get started on their periodic update. Webinar session topics include: periodic update basics, planning for critical areas and shorelines, and SEPA guidance. Check [Commerce's Periodic Update webpage](#) regularly for information on upcoming webinar sessions.

We also encourage local governments to reach out to other jurisdictions in their region to help foster ongoing collaboration and create opportunities for joint-planning efforts.

The Short Course on Local Planning (free to attend):

We encourage attending a [Commerce Short Course on Local Planning](#) session online or in-person (where available) to get started. Short Course videos from previous sessions are also available through the link above. Some of these trainings are mandatory for elected officials in Washington State.

The Short Course includes:

- An overview of the complex mix of land use planning laws that work together to support land-use decision-making in Washington State
- An introduction to comprehensive planning and plan implementation under the Growth Management Act
- A review of the roles in planning and best practices for public participation
- Mandatory training on the Open Public Meetings Act for local government officials.

Additional Resources

Commerce GMA Laws and Rules - <https://www.commerce.wa.gov/growth-management/gma-topics/gma-laws-and-rules/>

Commerce Growth Management – <https://www.commerce.wa.gov/growth-management/>

Commerce Quick Guide to Washington State Agencies and Their Role in the Periodic Update - <https://deptofcommerce.app.box.com/s/ped4mctp6zy1ch9610asu81j8sapcnl7>

Governor’s Office for Regulatory Innovation & Assistance - [assistance with permitting](#)

Municipal Research and Services Center (MRSC) - <https://mrsc.org/Home.aspx>

WA State Department of Ecology - <https://ecology.wa.gov/>

WA State Department of Fish & Wildlife - <https://wdfw.wa.gov/>

WA State Department of Health Community and Environment - <https://doh.wa.gov/community-and-environment>

WA State GMA RCW - <https://apps.leg.wa.gov/rcw/default.aspx?cite=36.70A>

WA State GMA WAC - <https://app.leg.wa.gov/wac/default.aspx?cite=365-196>

WA State Regional Transportation Planning Organizations (RTPO) & Metropolitan Planning Areas (MPO) - <https://www.wtp2040andbeyond.com/regional-perspectives-2/rtpos-mpos>

[Washington Indian Tribes and the Growth Management Act: Toward Inclusionary Regional Planning](#) (April 2020)