

Section: GENERAL DISTRIBUTION, LOCATION & COORDINATION OF LAND USES

Policy 1.0: Add language recognizing that Mount Vernon is physically divided by major **state highways, railroads, and the Skagit River**, which impact connectivity and cohesive planning.

Suggested Addition: "Land use planning must account for physical barriers such as SR-536 SR-538, BNSF rail lines, and the Skagit River, which divide the city and hinder contiguous development."

Section: PROCESS IMPROVEMENTS

Policy 3.0 to 3.3: Strong policies. Recommend adding language requiring a designated liaison or ombudsperson within the Development Services Department to assist with complex infill or residential housing permits, especially in constrained parcels.

Suggested Addition to 3.2: "Consider appointing a permitting liaison to help applicants navigate zoning challenges in physically constrained or flood-prone sites."

Section: EQUITABLE HOUSING, HEALTH & COMMUNITY STABILITY

Policy 5.0: Suggest highlighting that areas most burdened by environmental and planning constraints (e.g., flood risk, access limitations) often overlap with **vulnerable populations**, requiring targeted mitigation and planning support.

Section: RESIDENTIAL DEVELOPMENT & HOUSING

Policy 7.1: Recommend cross-referencing these areas with infrastructure and hazard maps to ensure higher-density housing is feasible and safe.

Policy 7.11: Encourage regulatory flexibility (cluster housing, cottage development) for odd-shaped or constrained parcels created by physical barriers.

Suggested New Policy:

Policy 7.X: Prioritize the siting of middle- and low-income housing in areas with adequate emergency evacuation access and services. Ensure new developments in hazard zones incorporate evacuation plans, resilient infrastructure, and equitable mitigation measures.

Rationale: Middle- and low-income households are statistically more likely to live in areas with elevated environmental risks—such as floodplains, wildfire zones, or neighborhoods bounded by highways and rail lines—due to the relative affordability of these locations. Without intentional emergency evacuation planning, these vulnerable populations face **heightened danger** during disasters and limited capacity to recover.

Mount Vernon's unique geography—divided by **the Skagit River, state highways, and a major rail corridor**—compounds these risks. Neighborhoods on the **West and South sides**, which include many lower-income residents, also sit in **Special Flood Hazard Areas (SFHAs)**. When evacuation routes are not clearly identified or maintained, these areas become **functionally isolated** during emergencies.

Additionally, Washington State's 2025 Commerce GMA Checklist requires jurisdictions to integrate **climate resilience, environmental justice, and hazard mitigation** into housing and land use policies. The absence of clear evacuation strategies in housing planning could therefore:

- **Violate environmental equity principles;**
- **Delay housing projects** due to unresolved safety concerns;
- **Undermine compliance** with state mandates (Checklist items B, O, and P).

By ensuring that new and existing middle-/low-income housing areas are connected to **well-marked, accessible evacuation routes**, the City can:

- Promote **safety and resilience;**
- **Expand feasible development areas;**
- Reduce future **public health and liability risks.**

Section: CRITICAL AREAS

Policy 10.1: Supportive. Expand to directly address the **flood-prone nature of the West and South sides** of the city.

Suggested Addition: "Development constraints related to flood risk in these areas should be explicitly reflected in zoning and capital improvement planning."

Policy 11.0: Recommend adding a visual overlay or map in the appendix showing designated flood zones and transportation barriers as a planning context tool.

Section: CLIMATE / NATURAL HAZARDS – Wildland Urban Interface (WUI)

Policy 14.X: Adopt Wildland-Urban Interface (WUI) development standards to reduce wildfire risk and protect lives, property, and infrastructure.

Sub-Policies:

- **14.X.1: Map areas of elevated wildfire risk and integrate WUI boundaries into zoning, development review, and comprehensive planning maps.**
- **14.X.2: Require WUI-appropriate site and building design in high-risk areas, including flame-resistant materials, defensible space, and vegetation management zones.**
- **14.X.3: Ensure new development in WUI areas provides at least two emergency egress routes and sufficient road width and grade for firefighting access.**
- **14.X.4: Coordinate with Skagit County Fire Districts and emergency services to review and enforce WUI standards.**
- **14.X.5: Promote public outreach and fuel reduction programs for existing homes in WUI areas.**

Rationale: Mount Vernon's proximity to forested rural land, especially near annexation boundaries, poses increased wildfire risk as growth expands outward. The WUI Code addresses the intersection of suburban expansion and wildfire hazard, reducing vulnerability for residents and first responders. It is essential that land use policies integrate wildfire-resilient standards to align with state law (RCW 36.70A.070) and ensure that hazard-prone development can be made safe, particularly for low-income communities.

Policy 18.X: Coordinate land use, infrastructure, and emergency planning with Skagit County Dike Districts to ensure levee systems continue to support safe development, comply with federal requirements, and align with long-term land use goals.

Rationale:

- **Dike Districts play a critical role in regulating development potential, insurance standards (e.g., NFIP), and disaster preparedness.**
- **With increasing climate pressures, integration of land use with dike maintenance and future levee upgrades is essential to protect both existing and planned housing—particularly in the flood-prone West and South zones.**

Concluding Statement:

The draft Land Use Goals and Policies document represents a comprehensive and progressive framework that incorporates modern housing strategies, environmental protection, and public engagement. It performs well in integrating middle- and low-income housing priorities, especially through:

- **Policy 7.1 and 7.2, which promote multiple units per lot and accessory dwelling units (ADUs);**
- **Policy 7.4 and 7.5, which support housing near employment and clear infill standards;**
- **Policy 7.10 and 7.11, which enable development flexibility, small-lot subdivisions, and affordable housing incentives;**
- **Recognition of the need for rental housing diversity, though it would benefit from more direct references to protecting long-term rental communities.**

However, key implementation risks include the lack of evacuation route planning, limited strategies for mobile home or manufactured housing, and no direct acknowledgment of renters' stability protections in gentrifying or infill-impacted areas. Bridging these gaps will ensure Mount Vernon's housing future is safe, resilient, and equitable for all income levels.