



**City Council Study Session
Tuesday, February 17, 2026**

Council Chambers
280 Madison Ave N
Bainbridge Island, WA

and

Remote Meeting on Zoom
<https://bainbridgewa.zoom.us/j/92947338351>
or Telephone: US: +1 253 215 8782
Webinar ID: 929 4733 8351

Agenda

- 1. Call to Order / Roll Call - 6:00 pm**
- 2. Approval of Agenda / Conflict of Interest Disclosure - 6:05 pm**
- 3. Regular Business**
 - A. (6:10 pm) Receive Presentation on Washington Department of Commerce Housing Accountability Act
 - B. (6:55 pm) Discuss Provision of the Department of Commerce Technical Assistance Directly to the City Council
 - C. (7:10 pm) Receive Presentation on City Land Capacity Analysis Methodologies for the updates to the Comprehensive Plan and Winslow Subarea Plan
- 4. Committee Reports - 7:55 pm**
- 5. Adjournment - 8:05 pm**

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prior to the meeting.



City Council Study Session Agenda Bill **Tuesday, February 17, 2026**

Agenda Item: (6:10 pm) Receive Presentation on Washington Department of Commerce Housing Accountability Act

Department: City Council Study Session

Agenda Section: Regular Business

Estimated Time: 45 Minutes

Recommendation:

Receive presentation

Narrative:

In a letter dated January 13, 2026, the City of Bainbridge Island was informed by the Washington Department of Commerce (Commerce) that it was selected for review under the Housing Accountability Act (ESSSB 5148). The Commerce Housing Section Manager and the Housing Accountability Program Manager will provide an overview of the Housing Accountability Act and what can be expected as a selected jurisdiction. There will be an opportunity for council members to ask questions of Commerce staff during this study session agenda item.

About the Housing Accountability Act

In 2025, the Washington Legislature adopted Engrossed Second Substitute Senate Bill 5148 (Chapter 269, Laws of 2025) — known as the Housing Accountability Act — to support robust and accountable housing planning statewide. The law establishes both voluntary and selected review processes for local housing elements and

housing-related development regulations, with the goal of improving alignment with the GMA and ensuring jurisdictions plan for and accommodate countywide housing allocations. Under the GMA, cities and counties must include a housing element that plans for housing affordable to all economic segments of the population, encourages a variety of housing types and densities, and supports preservation of existing housing stock. In 2021, [House Bill 1220](#) strengthened the state's housing planning requirements by directing jurisdictions to "plan for and accommodate" housing affordable to all income levels. The state also directed Commerce to project future housing needs by income level and provided new requirements for local housing elements.

Additional information can be found on the following Washington state websites:
[Housing Accountability Act \(RCW 36.70A.835\)](#)
[Dept. of Commerce Expanded Housing Element Checklist](#)
[Dept. of Commerce HAA Development Regulations Checklist](#)

Fiscal Impact:

Community Engagement and Outreach:

Attachments:

1. Bainbridge Island Housing Accountability Act Selected Review Letter Jan 2026
2. 260217 Dept of Commerce HAA Selected Review Overview and Next Steps
Bainbridge Island



STATE OF WASHINGTON
DEPARTMENT OF COMMERCE

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January 13, 2026

Ashley Mathews, Mayor
C/O Patricia Charnas, Planning Director
City of Bainbridge Island

Sent via electronic mail: amathews@bainbridgewa.gov and pcharnas@bainbridgewa.gov

Re: Housing Accountability Act Selected Review

Dear Mayor and Council Members,

In 2025, Engrossed Second Substitute Senate Bill 5148 ([Chapter 269, Laws of 2025](#)), also known as the Housing Accountability Act (HAA), was adopted to support robust and accountable housing planning by providing voluntary and selected review processes for the housing elements of local government comprehensive plans and housing development regulations. These processes are intended to assist local jurisdictions to align local plans and regulations with the housing planning requirements of the Growth Management Act (GMA) and plan for and accommodate local allocations of countywide housing needs. More details about the HAA can be found in [RCW 36.70A.835](#) and on Commerce's [Updating GMA Housing Elements web page](#).

The HAA Selected Review process provides that Commerce may select up to 10 cities and/or counties each calendar year for selected review. Commerce must select jurisdictions using criteria outlined in [RCW 36.70A.835\(9\)\(a\)\(i\)\(A-C\)](#). In this first year of the program, Commerce is selecting from those jurisdictions that have not planned for and accommodated their portion of countywide housing needs and whose 2024 periodic updates were due on or before December 31, 2024.

Commerce has identified eight jurisdictions for selected review in 2026. These jurisdictions:

- Did not submit a draft comprehensive plan for review and did not adopt a comprehensive plan by the statutory deadline, **or**
- Submitted a draft plan to Commerce which was inconsistent with state housing element requirements and did not adopt a comprehensive plan, **or**
- Adopted a comprehensive plan, but the housing element is inconsistent with state requirements after review and comment by Commerce planners.

Based on these criteria, Commerce has selected the City of Bainbridge Island for the HAA Selected Review program. Based on our review, it appears the City of Bainbridge Island has not submitted a housing element in an adopted comprehensive by the required periodic update deadline in [RCW 36.70A.130\(5\)](#).

As a jurisdiction selected for review, Commerce will be reaching out to staff in January 2026 to initiate conversations with the goal of the adoption of a comprehensive plan housing element and associated development regulations that are consistent with the requirements in RCW 36.70A.835(7). For more information, review the [HAA Selected Review Criteria and Procedures](#) document. During this process, Commerce will provide technical assistance as you amend your plan and regulations.

We look forward to working with the City of Bainbridge Island. We appreciate your coordination with our agency to implement the goals and requirements of the GMA. Laura Hodgson is the key contact for this work. She can be reached at laura.hodgson@commerce.wa.gov or 360-764-3143.

Sincerely,

A handwritten signature in black ink, appearing to read 'David Andersen', with a stylized, flowing script.

David Andersen, AICP, Managing Director, Growth Management Services

cc:

Valerie Smith, AICP, Deputy Managing Director, Growth Management Services
Ben Serr, AICP, Eastern Regional Manager, Growth Management Services
Carol Holman, MUP, Western Regional Manager, Growth Management Services
Anne Fritzel, AICP, Housing Section Manager, Growth Management Services
Laura Hodgson, Housing Planning and Data Manager, Growth Management Services
Ted Vanegas, Regional Planner, Growth Management Services
Jennifer Sutton, Senior Planner, City of Bainbridge Island

Housing Accountability Act: Selected Review

Overview and next steps for 2026
jurisdictions

Laura Hodgson

HOUSING PLANNING AND DATA MANAGER

2/05/2026



Washington State
Department of
Commerce

Housing Accountability Act (HAA)

- [SB 5148](#) (laws of 2025) provides for Commerce review and approval of housing elements and housing-related development regulations
- Two approval processes:
 - Voluntary Review
 - **Selected Review**



[RCW 36.70A.835](#)

HAA Selected Review Program

- In the Selected Review Program, Commerce must select jurisdictions for review based on criteria in RCW 36.70A.835(9):
 - **(A) The jurisdiction has not planned for and accommodated its portion of the countywide housing need**
 - Meaning: Housing element not adopted or inconsistent housing element adopted
 - (B) The jurisdiction's housing production is less than 50 percent of their share of countywide housing production adjusted by housing need
 - (C) The jurisdiction's housing production consists of greater than 80% single-family homes aimed at households earning >120% AMI
- Criteria for 2026 is just "(A)" above
- Each year, Commerce may select up to 10 jurisdictions for review

HAA Selected Review Program

- For 2026, Commerce selected 8 jurisdictions for Selected Review:
 - Bainbridge Island
 - Beaux Arts Village
 - Brier
 - Carnation
 - Darrington
 - DuPont
 - Gold Bar
 - Woodway

For HAA Approval, Local Government Planning Documents must be Consistent with:

- The housing planning goal in RCW 36.70A.020(4);
- The housing element requirements in RCW 36.70A.070(2);
 - Identify existing and projected housing needs
 - Identify sufficient land capacity for housing needs
 - Identify barriers to affordable housing and actions to address (adequate provisions)
 - Identify policies and regulations that result in racially disparate impacts and policies to begin to undo these impacts
 - Identify areas at risk of displacement and anti-displacement policies
- Any relevant rules adopted by Commerce;
- Any relevant state environmental policy act (SEPA) requirements;
- The county or city's comprehensive plan;

[See Commerce's
Expanded Housing
Checklist](#)

For HAA Approval, Local Government Planning Documents must be Consistent with:

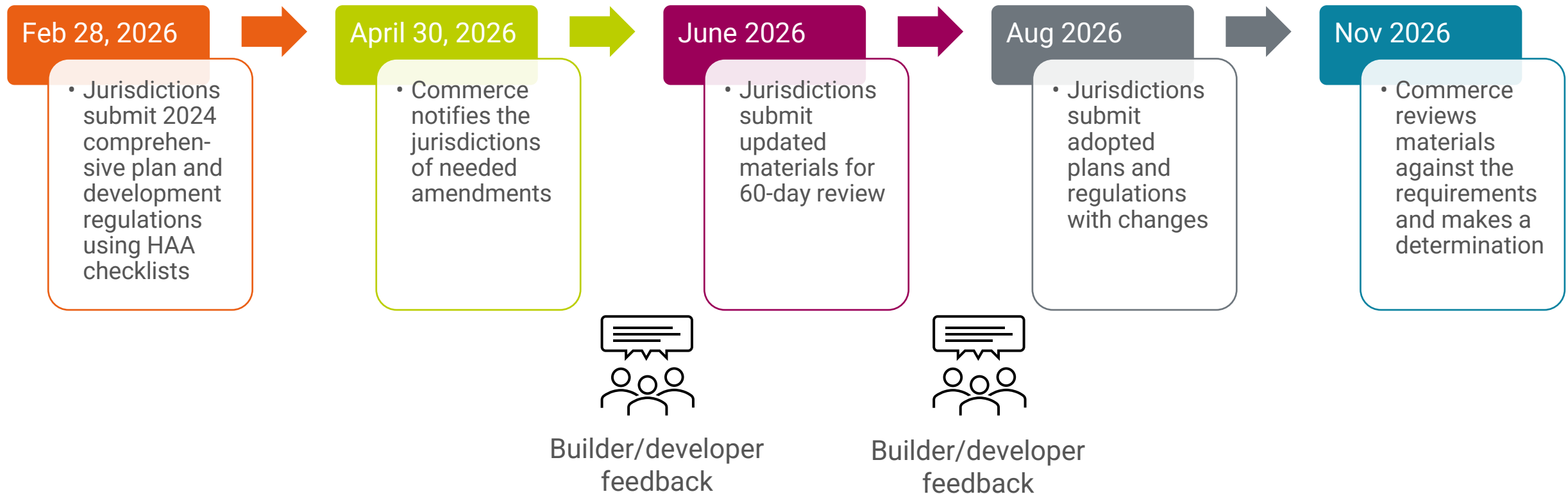
- Housing **land capacity** requirements in RCW 36.70A.115;
- Emergency shelter, transitional housing, emergency housing, and permanent supportive housing (**STEP**) requirements in RCW 35.21.683 and 35A.21.430;
- **Co-living requirements** in RCW 36.70A.535;
- **Density bonuses** required in RCW 36.70A.545;
- **Parking requirements** in RCW 36.70A.620 (repealed) and 36.70A.622;

Not applicable to Bainbridge Island:

- *Middle housing requirements, as applicable, in RCW 36.70A.635–638; and*
- *Accessory dwelling unit requirements in RCW 36.70A.680-682 and 696-69*

See Commerce's [HAA Development Regulations Checklist](#)

Approximate Timelines



If HAA results in Non-Compliance Decision

- **Jurisdictions:**

- May not deny affordable or moderate-income housing development
- May not approve affordable or moderate-income projects with conditions that have a substantial adverse impact on the project
- May not be eligible for certain state grants and loans, including those in [WAC 365-196-585\(6\)](#)
 - Public Works Trust Fund (Public Works Board)
 - Centennial Clean Water Fund (Department of Ecology)
 - Drinking Water State Revolving Fund (Department of Health)
 - Recreation and Conservation Office
 - Transportation Improvement Board
 - Predisaster Mitigation Grants (Emergency Management Division, Washington Military Department)
 - Water Pollution Control Facilities Grants

By-right Affordable Housing Provision

By-right Affordable Housing Provision applies unless at least one of the following conditions is met:

- A jurisdiction has received a compliance decision from Commerce
- Denial/approval of the development is required in order to comply with state or federal law
- The development is outside of an urban growth area, in a critical area or critical area buffer where development is not permitted, or in a shoreline master program area where residential uses are not allowed
- The development is located where residential or mixed-use development is not permitted

RCW 36.70A.835(11)

By-right Affordable Housing Provision

- The development **MUST** be an affordable or moderate-income development
 - At least 20% of units are affordable as defined in RCW 36.70A.130 (60% AMI rental or 80% AMI ownership, and no more than 30% of income),
 - At least 50% of the units are workforce housing (below 80% AMI rental or below 100% AMI ownership, and no more than 30% of income), OR
 - All of the units are moderate-income housing (below 120% AMI)
- The development must ensure affordability for a minimum of 25 years
- The county or city must periodically audit affordability

Resources

- See “Housing Accountability Act” on [Updating GMA Housing Elements webpage](#)
 - www.commerce.wa.gov/growth-management/housing-planning/housing-guidance/
- [RCW 36.70A.835](#)

Questions?

Updating GMA Housing Elements

[Growth Management](#) > [Housing Planning](#) > [Updating GMA Housing Elements](#)



Housing Accountability Act

In 2025, the Washington State Legislature adopted Senate Bill 5148 ([Chapter 269, Laws of 2025](#)). Known as the Housing Accountability Act (HAA), this bill is intended to support robust and accountable housing planning by providing both voluntary and selected approval processes for local government housing elements and housing development regulations.

- [Housing Accountability Act \(SB 5148\) fact sheet \(PDF\)](#)
- [Housing Accountability Act frequently asked questions \(PDF\)](#)
- [Housing Accountability Act checklists](#)
 - [Expanded Housing Element Checklist \(PDF\)](#)
 - [HAA Development Regulations Checklist \(PDF\)](#)

[Voluntary review](#)



[Selected review](#)



Thank you!

Laura Hodgson

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City Council Study Session Agenda Bill
Tuesday, February 17, 2026

Agenda Item: (6:55 pm) Discuss Provision of the Department of Commerce Technical Assistance Directly to the City Council

Department: City Council Study Session

Agenda Section: Regular Business

Estimated Time: 15 Minutes

Recommendation:

Discussion only.

Narrative:

Following the presentation from the Washington Department of Commerce on the Housing Accountability Act (HAA), Council will discuss the provision of Department of Commerce technical assistance directly to Council.

Fiscal Impact:

Community Engagement and Outreach:

Attachments:

None



City Council Study Session Agenda Bill **Tuesday, February 17, 2026**

Agenda Item: (7:10 pm) Receive Presentation on City Land Capacity Analysis Methodologies for the Updates to the Comprehensive Plan and Winslow Subarea Plan

Department:

Agenda Section: Regular Business

Estimated Time: 45 Minutes

Recommendation:

Information only

Narrative:

Kitsap is a "Buildable Lands" county where land capacity analyses (LCAs) are required by state law to be completed as a step in a periodic review of Comprehensive Plans. The 2021 Kitsap County Buildable Lands Report describes a "look back" on what lands were developed, which informs a LCA to "look forward" to analyze how to achieve new population, housing and employment targets.

LCAs are in-depth calculations of a parcel's ability to support development. Cities normally adjust countywide LCA methods to address the differences between urbanized and rural lands so that a more accurate measurement of capacity for new housing development on vacant, partially used or under-developed lands is produced. Land capacity takes into account such factors as zoning and development standards, infrastructure, environmental constraints, roads and

easements to estimate current land capacities. All Kitsap cities made such adjustments to the Kitsap County LCA methodology as documented in [Appendix C: County/City Documentation of Assumptions of the 2021 Kitsap County Buildable Lands Report](#).

In its updated 2026 guidance on preparing Housing Elements for Comprehensive Plan updates, the Washington Department of Commerce provided more specificity on land capacity methodologies that now must evaluate capacity to accommodate allocated housing needs at all income levels.

This evening's discussion will begin with an overview of LCA methodologies and present comparisons between the LCA utilized for island areas outside of Winslow, which exhibits more low and undeveloped lands versus the LCA for the more urban Winslow Subarea.

Additional information about the updates to the City's Comprehensive Plan and Winslow Subarea Plan can be found on the project websites:

<https://cityofbainbridgeisland.civilspace.io/en/projects/2024-comprehensive-plan-periodic-update>

<https://cityofbainbridgeisland.civilspace.io/en/projects/winslow-subarea-plan-update>

Fiscal Impact:

Community Engagement and Outreach:

Attachments:

1. LCA Chapter_2026_Housing_Element
2. Land Capacity Analysis 2024-05-10

Chapter 3. Land capacity analysis

The Growth Management Act (GMA) requires comprehensive plans to include a housing element that identifies “sufficient capacity of land” to accommodate all projected housing needs during the twenty-year planning horizon (RCW 36.70A.070(2)(c)).

In other words, jurisdictions should evaluate whether they have sufficient land capacity available to allow for the types and amount of new housing needed to meet identified housing needs. The 2021 housing element updates amended this section of the Act to require the housing element to include explicit consideration of capacity for the following household needs and building types:

- Moderate, low, very low, and extremely low-income households;
- Permanent supportive housing;
- Emergency housing and emergency shelters; and
- Duplexes, triplexes and townhomes (within an urban growth area boundary).

In this guidance, all references to “housing needs” refer to the jurisdiction’s allocated share of countywide housing needs. Counties and cities are expected to work together to allocate countywide projected housing needs to individual jurisdictions, as detailed in Commerce’s guidance titled [“Establishing Housing Targets for your Community”](#) (2023). These housing need allocations are derived from population projections. Therefore, so long as jurisdictions show sufficient land capacity for their housing and employment growth, jurisdictions are not also required to show sufficient land capacity for population.

After counties and cities work together to allocate countywide housing needs, each individual jurisdiction is then required to document sufficient capacity to accommodate all housing needs allotted to them. This section details how a jurisdiction can document the availability of capacity in accordance with RCW 36.70A.070(2)(c).

What is a land capacity analysis?

Counties and cities must conduct a Land Capacity Analysis (LCA) to measure and document capacity for new housing development on vacant, partially used or under-developed lands. This analysis considers the potential for land within a community’s boundaries to accommodate new housing growth, given what is allowed under current zoning and development regulations and what can reasonably be anticipated based on past development and factors that may cause trends to change in the future.²¹

Unlike a Buildable Lands Analysis, which looks backward at performance under the previous period’s comprehensive plan, an LCA looks forward to the land uses and development types planned for the next planning period, as described in [WAC 365-196-325](#).²² While the focus of an LCA is on the potential for new development under current regulations and zoning, past trends and other factors should be considered to ensure that projected capacity is realistic. RCW 36.70A.070(2)(d) includes separate requirements for analyzing barriers and limitations that prevent new development from achieving planned densities and housing types. These requirements are covered in [Chapter 4. Adequate provisions](#), and are separate from the LCA.

²¹ See [WAC 365-196-310\(4\)\(b\)\(ii\)\(E\)](#). At the time of publication, this section had not yet been updated to reflect new GMA requirements for measuring land capacity for different income levels and housing types.

²² Note, at the time of publication, [WAC 365-196-325](#) had not yet been updated to reflect new GMA requirements for measuring land capacity for different income levels and housing types.

During development of this guidance, Commerce already had detailed guidance for performing an LCA in its [Urban Growth Area \(UGA\) Guidebook](#) (2012), starting on page 84.²³ This new LCA guidance builds on the framework of the UGA Guidebook to provide additional recommendations for how to demonstrate capacity for housing production by income level and for specific housing types, consistent with new GMA requirements.²⁴

Under the GMA, jurisdictions must adopt and implement any necessary changes to achieve enough land capacity to accommodate all housing needs by their comprehensive plan periodic update deadline.²⁵ Cities and counties must “ensure that, taken collectively, adoption of and amendments to their comprehensive plans and development regulations provide sufficient capacity of land suitable for development within their jurisdictions to accommodate their allocated housing and employment growth...” ([RCW 36.70A.115](#)).

For example, if a jurisdiction’s comprehensive plan identifies a residential land capacity deficit for middle housing types to serve the projected number of moderate-income households, then the implementing development regulations must at least include changes to the zoning code, zoning map and other associated development regulations, as needed, to allow sufficient middle housing to overcome that deficit. That additional capacity should be allowed “by right” to ensure that there are minimal hurdles to building the needed capacity.

This chapter has two sections. The first provides a methodology for evaluating capacity to accommodate allocated housing needs, including housing needs at all income levels; permanent supportive housing; and, within urban growth areas, duplexes, triplexes and townhomes.²⁶ The second section addresses capacity for emergency housing and emergency shelter, which provide temporary accommodations for those who are homeless or at imminent risk of becoming homeless. Emergency housing is treated differently in Commerce’s guidance, as discussed in more detail in that section below.

²³ The UGA Guidebook is located at: <https://deptofcommerce.app.box.com/s/pnkar5j81ghxrgfdgr3ofa7pmw5v37da>

²⁴ As of January 2026, Commerce is finalizing an update to the 2012 UGA Guidebook. The Draft UGA Guidebook (2025) is located here: <https://deptofcommerce.app.box.com/s/0psahjxca4rk0wwnv1vjxadb38brexmr>, with guidance on LCAs starting on page 36. The final version will be published in early 2026.

²⁵ [RCW 36.70A.130\(1\)\(a\)](#): Except as otherwise provided, a county or city shall take legislative action to review and, if needed, revise its comprehensive land use plan and development regulations to ensure the plan and regulations comply with the requirements of this chapter according to the deadlines in subsections (4) and (5) of this section.

²⁶ See [RCW 36.70A.070\(2\)\(c\)](#).

Defining household income segments

The land capacity requirements of the housing element in RCW 36.70A.070(2)(c) reference moderate, low, very low and extremely low-income households. [RCW 36.70A.030](#) provides definitions for households by income level relative to “median household income adjusted for household size, for the county where the household is located, as reported by the United States department of housing and urban development.” The Department of Housing and Urban Development (HUD) publishes this income standard, referred to as Median Family Income or Area Median Income (AMI), for each county on an annual basis.

Exhibit 6 presents the definitions for each income level as stated in RCW 36.70A.030. These are the same income thresholds used for Commerce’s projected housing needs, with the exception that Commerce breaks out Moderate Income into two groups: >80-100% of AMI and >100-120% of AMI.

Exhibit 6. Income level definitions in RCW 36.70A.030

Household income segment	Income relative to area median income (AMI)
Extremely low-income	0-30% of AMI
Very low-income	>30-50% of AMI
Low-income	>50-80% of AMI
Moderate income	>80-120% of AMI

In addition to these income segments, RCW 36.70A.070(2)(c) notes that land capacity analyses now need to take into consideration permanent supportive housing (PSH), emergency housing and emergency shelters. As noted in [Establishing Housing Targets for your Community](#) (Book 1),

- PSH needs are a subset of the total 0-30% AMI housing needs. While some households in PSH may have incomes higher than 30% AMI, the majority of these households are likely to be in the 0-30% AMI bracket as this is where disability incomes would fall, and RCW 36.70A.030 requires PSH participants to have “complex and disabling” conditions and service needs. Therefore, the 0-30% AMI housing needs are split into two categories: PSH and Non-PSH.
- Both emergency housing and emergency shelter include temporary accommodations. In implementation, there may be overlap between what could be considered emergency housing versus emergency shelter. For this reason, emergency housing and emergency shelter are considered a single category and referred to throughout this guidance as “emergency housing.”

Evaluating capacity for housing needs for all income levels

Commerce recommends that counties and cities complete each of the steps shown in Exhibit 7 to analyze and assess their capacity by income level. Each step is described in more detail in the sections that follow.

Buildable lands counties subject to RCW 36.70A.215 or those that have already completed a land capacity analysis may have already completed the analysis needed for Step 1. In that case, they can use the output from that analysis to complete the remaining steps.

Exhibit 7. Steps for demonstrating sufficient capacity to meet all housing needs by income level



The goal of this process is to show quantitatively whether the jurisdiction has enough capacity to meet its allocated housing needs at each income level.²⁷ If, at the conclusion of Step 5, the analysis shows a deficit of capacity for one or more income levels, then the jurisdiction must identify actions that can increase capacity. This may include rezoning areas to allow for new housing types or higher densities or taking other effective steps. Then the jurisdiction must return to Steps 1-5 to recalculate capacity and compare to needs.

²⁷ Permanent supportive housing (PSH) units are grouped with 0-30% AMI housing units in this methodology.

Analyzing land capacity in rural areas

Housing development in rural areas often consists of a single-family home on a minimum of five acres. Given today's construction prices, new housing development in rural areas will typically serve households with income levels of >120% AMI. Therefore, a land capacity analysis of rural areas is only required when counties need to show sufficient land capacity for their housing needs below 120% AMI. If this land capacity analysis is needed, Commerce recommends considering the following guidance.

- Building or placing new housing for households below 80% AMI in rural areas is only suitable in Local Areas of More Intense Rural Development (LAMIRDs), master planned resorts, fully contained communities, and tribal areas, unless documentation is provided to show that this is feasible for new construction in other areas.
 - When considering housing capacity in LAMIRDs, jurisdictions should confirm that existing public facilities and services are available to support the proposed housing and the housing is consistent with rural character (RCW 36.70A.070(5)(d)(i)(C)).
 - Residential capacity in master planned resorts must support the on-site recreational nature of the resort (RCW 36.130.360(3)).
 - New fully contained communities must be consistent with RCW 36.70A.350.
 - Tribal areas are not required to plan for or accommodate countywide housing needs but may choose to do so in agreement with the county.
- For housing needs between 80-120% AMI, jurisdictions should provide supporting information that the housing capacity outside of UGAs can be affordable to households at these income levels. Possibilities include:
 - A very small percentage of capacity can be assumed to be met by new rural accessory dwelling units (ADUs) assuming the rent would likely support households in the 80-120% AMI range.
 - Local governments may use manufactured homes as a portion of their 80-120% housing needs in rural areas if there is evidence of siting manufactured homes at these prices. It is appropriate to assume a rate of manufactured home placement in rural areas that is consistent with trends.
- Farmworker housing permitted by the Department of Health (DOH) is not considered housing for purposes of an LCA because it is not considered permanent, all-year housing.

However, changes to the GMA in 2021 allow for redevelopment and infill within local areas of more intense rural development (LAMIRDs) that have public facilities and services. Therefore, some counties may consider applying this LCA methodology to evaluate potential capacity for housing production in select LAMIRDs that can support new development.

Step 1. Summarize land capacity for housing production by zone

Residential land capacity is a combination of the amount of land available for development, the housing types and densities allowed under applicable development regulations, and any encumbrances on the land that limit the ability to develop, such as environmental constraints, infrastructure requirements or local market forces. In this step, jurisdictions should summarize land capacity by zone as follows:

1.1 Identify residential land supply and assign development status

Identify parcels in zones where residential uses are permitted, including parcels in mixed-use zones. Classify each parcel in the residential land supply as either vacant, partially-used, under-developed, pipeline or

developed. Classification is based on a combination of current development characteristics for each parcel and the applicable zoning regulations. Classification typically involves the following steps:

- Calculate the current density of permitted development on the parcel (dwelling units per acre or floor-area-ratio). If the property is currently undeveloped, it should be classified as vacant.
- Compare the current density of non-vacant land to the density allowed under applicable zoning. If the current achieved density is substantially below allowed density, the property may be classified as partially-used or under-developed. Jurisdictions are responsible for setting reasonable thresholds for this determination, but the following guidelines are commonly used:
 - Vacant – Parcels of land that contain no structures or have buildings with low value. The [Commerce UGA Guidebook \(2012\)](#) includes lands with improvement values of less than \$500 in the vacant classification. Jurisdictions may set different improvement value thresholds based on local knowledge and market characteristics, but these should be consistent with any applicable county-level land capacity analysis or buildable lands report.
 - Partially-used – Parcels occupied by a use, but which include enough land to be further subdivided for additional development without rezoning. For example, a 1-acre lot zoned for four units per acre that contains one single-family home could be subdivided to allow development of up to three additional units.
 - Under-developed – Parcels that are likely to redevelop to a more intensive land use than that which currently occupies the property, either due to market forces or because applicable zoning allows a more intensive use than the current development. Examples of under-developed properties include:
 - A single-family home on property in a multifamily zone.
 - A multifamily residential property developed at a density below that allowed by the applicable zone. Jurisdictions may set this threshold according to local conditions. For example, King County's 2021 Urban Growth Capacity Report recommends a ratio of allowed density to achieved density of at least 1.5:1 as a reasonable minimum threshold, but less urban jurisdictions with less active development markets may consider higher thresholds.
 - A property with relatively low improvement value compared to the value of the land (a ratio less than 1:1 is a commonly used threshold, as described in the 2012 Commerce UGA Guidebook).
 - Pipeline – Parcels that are currently engaged in the permitting process (for example, permit applications under review or engaged in pre-application consultation) and are anticipated to be developed in the near future. These properties should be excluded from the land capacity analysis. Because they represent future development, jurisdictions may count units anticipated to develop on pipeline properties toward their projected housing needs (see Step 5).

If the base year of the LCA is later than 2020, residential development since 2020 may also be considered in the same manner as pipeline. See Step 5 for detailed guidance.

Technical resources

[Draft UGA Guidebook \(Department of Commerce, 2025; final expected early 2026\)](#) - Detailed guidance for land capacity analysis methodology can be found starting on **page 36**.

[Buildable Lands Guidelines \(Department of Commerce, 2018\)](#) - Guidance on methodology starts on **page 30**.

[Housing Memo: Issues Affecting Housing Availability and Affordability \(Department of Commerce, 2019\)](#) - Considerations for housing trends in your community.

- Developed – Parcels that have been developed for a primary use and do not meet the criteria for the categories above. These parcels are assumed to have no capacity for additional development under current zoning regulations.

1.2 Exclude lands unlikely to develop

Some properties (or portions of properties) will have characteristics that make them unlikely to develop in the near future or ever, and such lands should be excluded from the available land supply. Conditions that prevent development often include the following:

- Critical areas – Environmental constraints regulated under the jurisdiction’s critical areas regulations, such as wetlands, fish and wildlife habitat conservation areas, geological hazardous areas, frequently flooded areas, etc. that preclude significant development.
- Public use – Lands owned by a government or public agency that are used and managed for public purposes, such as parks, schools or utility facilities. Most land owned by governments or public agencies is unlikely to be developed for housing in the near future and should therefore be excluded from the available land supply. Other local factors such as historic districts, conservation easements or ownership by a non-profit organization should also be considered when identifying public-use properties.

However, any properties owned by governments and public agencies that are intended for housing production, such as land owned by a housing authority, should be included in the LCA. Similarly, public properties that have been declared surplus and are otherwise suitable for residential development may be included in the available land supply.

- Capital infrastructure – Easements, rights-of-way and other major facilities associated with public utilities or transportation infrastructure. Jurisdictions are not required to conduct detailed plat research to identify all easements across private property, but major utility corridors and known easements with the potential to affect development of the property should be identified and considered.

1.3 Identify gaps in utility infrastructure and services

Gaps in infrastructure for utilities and public services can inhibit development, keeping achieved densities below the level planned by the jurisdiction and allowed by development regulations. The GMA requires comprehensive plans to plan for the capital facilities needed to serve anticipated levels of growth during the planning period (RCW 36.70A.070(3)). Further, jurisdictions planning under the Review and Evaluation Program (RCW 36.70A.215), also referred to as "buildable lands" jurisdictions, are required to consider infrastructure gaps when evaluating whether sufficient land is available to meet growth targets, including the presence of transportation, water, sewer and stormwater infrastructure (RCW 36.70A.215(3)(b)(i)).

This guidance recommends that all cities and counties identify what portions of their planning area, if any, are affected by infrastructure gaps that have the potential to prevent planned densities from being achieved during the planning period and engage in coordination with any utility service providers operating within the jurisdiction. This includes review of comprehensive plan capital facilities or transportation elements, as well as applicable utility system plans, to determine if any service or infrastructure improvements to address these gaps are planned. If infrastructure gaps are identified, and no corrective capital improvements are planned, jurisdictions should take one of the following actions:

- For areas that are already developed at urban densities, determine the maximum residential density that is feasible without infrastructure improvements and apply this density assumption when calculating capacity for these areas when new infrastructure is unlikely within the planning period;²⁸ or
- For underserved and undeveloped areas where reaching planned densities requires infrastructure, calculate land capacity using planned densities for the applicable zone and commit to providing infrastructure adequate to support this level of growth within the planning period. This commitment should include updates to applicable capital facilities and system plans that identify necessary capital improvement projects and funding sources, to be delivered concurrently with adoption of the comprehensive plan update. If a jurisdiction is unable to provide this commitment, the area should generally not be included with the UGA.²⁹

If a city or county elects to apply reduced residential density assumptions to areas affected by infrastructure gaps, they are still required to demonstrate adequate overall capacity to meet projected housing needs, and zoning changes may be necessary elsewhere in the jurisdiction to supply the needed capacity.

²⁸ If a jurisdiction opts for this scenario, they are still required to provide urban areas with adequate public facilities. See [WAC 365-196-320\(1\)\(d\) and \(f\)](#).

--Section (d): "At a minimum, adequate public facilities in urban areas should include sanitary sewer systems, and public water service from a Group A public water system under chapter [70A.120](#) or [70A.125](#) RCW because these services are usually necessary to support urban densities. The services provided must be adequate to allow development at urban densities and serve development at densities consistent with the land use element and meet all regulatory obligations under state and federal law."

--Section (f): "The obligation to provide urban areas with adequate public facilities is not limited to new urban areas. Counties and cities must include in their capital facilities element a plan to provide adequate public facilities to all urban areas, including those existing areas that are developed, but do not currently have a full range of urban governmental services or services necessary to support urban densities."

²⁹ Critical areas would not need to be removed from the UGA due to lack of infrastructure.

1.4 Calculate gross residential capacity by zone

For each zone, calculate the amount of available residential development capacity according to the following steps:

A. Developable acreage – Calculate total acreage of developable land available by development status (vacant, partially-used and under-developed). As described previously, developable acreage should exclude areas encumbered by critical areas and easements that prohibit significant development based on the guidelines below.

- If the jurisdiction's development code permits housing development based on net density (total parcel area minus constrained areas), all encumbered areas should be excluded from developable acreage. (For example, a 10-acre parcel with 2 acres occupied by wetlands and associated buffers would have 8 acres of developable area.)
- If the jurisdiction's development code permits housing development based on gross density (total parcel area), only completely encumbered properties should be excluded. Partially-constrained properties should be included at their full acreage.
- If parcel-level data on environmental constraints is not available, jurisdictions may determine the total acreage of critical areas for each zone and deduct this from the total developable land supply for the zone.

B. Apply deductions for infrastructure needs and land unavailable for development – New development generally requires new infrastructure improvements (roads, utilities, etc.). These improvements occupy land, reducing the acreage available for housing development. The amount of the deduction for infrastructure can vary by location and development status. For example, redevelopable land and infill vacant lots in urban areas may already be partially or fully served by existing infrastructure and may require a smaller deduction than greenfield areas.

Deductions for infrastructure may be further reduced (or unnecessary) if a jurisdiction regulates housing development based on gross density, rather than net density.³⁰ Similarly, in areas where infrastructure gaps have been identified (Step

Incorporating HB 1110 (2023) into the LCA

The LCA guidance was developed prior to passage of the middle housing bill, [HB 1110 \(2023\)](#). This bill requires certain jurisdictions to allow multiple units per lot, changing the typical density calculations from units per acre or floor area ratio to units per lot. Until further guidance is developed, jurisdictions may want to consider using the following approach - drawn from the Puget Sound Regional Council's (PSRC) impact analysis of HB 1110 - to help determine the capacity impacts of this bill.

When considering additional density because of middle housing regulation changes, consider:

1. Which lots would be potentially redevelopable (i.e., those without Homeowners Association (HOA) restrictions, those that are vacant or have only one dwelling unit, those with a developable area over 2,000 square feet, etc.).
2. Of the lots in Step 1, determine which subset of lots may economically make sense to redevelop. A starting point for this analysis could be where the land value is greater than the improvement value and the built square footage is less than 1,400 square feet.
3. Estimate the total development potential of lots selected through Step 2, i.e., the maximum number of dwelling units allowed to be developed on these lots net of existing units. Then determine what percentage of the total development potential (or net maximum dwelling units) could reasonably be expected to redevelop over the 20-year planning period. A conservative estimate could be 25%, but tailor this factor to what is most appropriate for your jurisdiction and local market conditions.

Also see the [Middle Housing User Guide](#), section 4.4 on pages 94-96, for additional information on land capacity analysis for middle housing.

³⁰ Jurisdictions may regulate the allowed density of development in a variety of ways. Gross density is measured as the number of housing units divided by total land area, without any deductions. Net density is calculated after first deducting non-buildable areas from the total amount of land, including environmentally critical areas and associated buffers, land needed for roads, stormwater detention

1.3), a smaller deduction for infrastructure needs would be appropriate if corrective capital improvements are not planned.

If a deduction is applied for infrastructure, a jurisdiction may determine this percentage based on recent development activity, being careful that infrastructure percentage deduction factors are based on land not constrained by critical areas.

Likewise, after application of deductions for necessary infrastructure, some portion of the remaining developable land supply may remain unavailable for development during the planning period due to site conditions, economic factors or unwillingness to develop or sell on the part of the property owner. Jurisdictions should refer to the discussion of market factors presented in the 2012 Commerce UGA Guidebook for guidance on establishing appropriate deduction values. Based on examples presented in the UGA Guidebook, the following market factor deductions are reasonable assumptions:

- Vacant properties: 15%
- Partially-used and under-developed properties: 25%

Alternatively, if a community has conducted specific market factor analysis, such as analysis performed under the requirements of the buildable lands program, the results of that evaluation may be used here, provided the jurisdiction documents the analysis and associated assumptions. Additional consideration for market challenges and their relationship to local regulatory or process barriers is in Chapter 4. Adequate provisions.

C. Calculate total residential capacity for developable land by zone – Calculate total capacity for residential development by multiplying the developable acreage of land by an assumed density level expressed in units per acre.³¹ Jurisdictions should establish assumed densities for each residential zone. The [2012 Commerce UGA Guidebook](#) and WAC Sections [365-196-210\(6\)](#), [365-196-310\(4\)\(b\)\(ii\)\(E\)](#) and [365-196-325\(2\)](#) establish guidance on the factors that should be considered when establishing growth assumptions for a land capacity analysis:

- **Since the LCA is a forward-looking analysis, jurisdictions should focus on the level of development expected to occur during the planning period.** Assumed densities for use in the LCA should consider the maximum densities allowed under zoning, and historic trends and achieved residential densities, as well as factors, which may cause trends to change in the future. In some cases, achieved densities will be similar to maximum allowed densities. However, many factors beyond the control of cities and counties can influence the level of future development. Therefore, compare allowed densities to achieved densities to identify zones that have historically underperformed relative to planned levels of development.
- At a minimum, assumed densities should reflect the current achieved residential densities for each zone but should not exceed the maximum density allowed by right under the development code.

and utilities. The GMA does not mandate a particular way to measure density, so jurisdictions should use a method for the LCA that is consistent with their adopted development regulations and any existing Buildable Lands analysis (as applicable).

³¹ At the time of publication, WAC 365-196-210(6) states that: "Assumed densities' means the density at which future development is expected to occur as specified in the land capacity analysis or future land use element. Assumed densities are also referred to in RCW 36.70A.110 as densities sufficient to permit the urban growth that is projected to occur."

- Jurisdictions may consider the availability of density bonuses and incentive programs related to the provision of affordable housing units. Such bonuses and incentives may be used to justify assumed densities up to (but no higher than) the maximum allowed base density of the zone if documentation is provided on past trends of affordable housing production under these incentives.
- Jurisdictions planning under the Review and Evaluation Program (RCW 36.70A.215) should incorporate information from applicable buildable lands reports when establishing assumed densities for the LCA. See sidebar.
- If information on achieved density or historic development trends is not available (e.g., when a zone is newly adopted or recently amended), jurisdictions should review recent examples of permitted projects in similar zones or in peer jurisdictions as models of future development densities.

In mixed-use zones and areas regulated under form-based codes, assumed residential densities must consider the potential development of non-residential uses. To avoid counting more residential capacity than will develop over the planning period, jurisdictions must account for non-residential uses when calculating capacity in these zones. Mixed-use and form-based development regulations can vary by geography and urban context, so jurisdictions should choose an approach that is most consistent with their development code.

If a mixed-use zone establishes separate standards for maximum residential density and maximum non-residential Floor Area Ratio (FAR), the jurisdiction could determine an assumed residential-commercial split for the zone based on permitting trends or other local information. This ratio could then be used to adjust either the assumed density of the zone or the amount of developable land available:

- **Adjusted density assumption:** For example, if future development in the zone is expected to be 60% residential and 40% commercial, the jurisdiction could select a residential density assumption equal to 60% of what would be achieved if the zone were 100% residential and apply that adjusted density to the full developable acreage. If the zone allows up to 40 units per acre, applying this split on a 10-acre developable site would yield the following:

40 units/acre permitted x 60% residential = 24 units/acre
10 developable acres x 24 units/acre = 240 units

- **Adjusted developable acreage:** Similarly, the jurisdiction in the example above could instead choose to apply the residential-commercial split to the amount of developable land available and calculate capacity using the full planned density for the zone:

10 developable acres x 60% residential = 6 residential acres
6 residential acres x 40 units/acre = 240 units

If you are in a “buildable lands” county, subject to RCW 36.70A.215, then your jurisdiction has extra responsibilities. These counties (which include Clark, King, Kitsap, Pierce, Snohomish, Thurston and Whatcom) and the cities and towns within their boundaries, must gather data on the density and type of development that is occurring to understand whether development is occurring as planned.

Unlike the LCA, which looks forward at how your current capacity and new population targets will work as you update your plan, buildable lands looks back at how your current comprehensive plan is functioning and whether the jurisdiction met their assumed density goals.

If actual development patterns are different from those planned for in the comprehensive plan, the jurisdiction must adopt “reasonable measures” that will address those inconsistencies during the next update period.

Any observations on development patterns and achieved densities are useful for making assumptions about undeveloped land and can be used for completing an LCA.

Mixed-use zones focused on combined residential and commercial uses within the same building or development site may instead establish a maximum FAR standard for the entire property, regardless of use. Similar to the examples above, the jurisdiction should estimate the relative share of future residential development in the zone (e.g., 60%) and adjust the FAR assumption used in the capacity analysis to reflect only the residential share. Apply the total developable acreage for the zone to this adjusted FAR assumption to derive the anticipated square footage of residential development and then convert to housing units based on an assumed average unit size.

$$\begin{aligned}
 &3.0 \text{ Maximum FAR} \times 60\% \text{ Residential} = 1.8 \text{ Residential FAR} \\
 &10 \text{ developable acres (435,600 sq ft)} \times 1.8 \text{ Residential FAR} = 784,080 \text{ residential sq ft} \\
 &784,080 \text{ residential sq ft} / 800 \text{ sq ft per unit} = 980 \text{ units}
 \end{aligned}$$

Jurisdictions using form-based codes must likewise establish assumptions about the mix of residential and commercial uses and the expected density of residential development in these zones. Similar to mixed-use zoning described above, these assumptions should be based on residential density or non-residential FAR requirements in the code itself (if they exist) that are expected to occur (e.g., assumed density) and/or on historic development trends in these zones or similar zones with similar market factors.

Exhibit 8 shows an example of the process for calculating gross residential capacity by zone described in steps 1.4.A – 1.4.C above.

Exhibit 8. Example calculation of gross residential capacity by zone

Zone	Gross developable land (acres)		Infrastructure/ land availability deduction factor	Net developable land (acres)		Assumed density (units/acre)	Gross residential capacity (units)
Single Family Residential (R-4)	Vacant	760	15%	646	2,924	2.5 units/acre	7,310
	Partially-used	1,288	25%	966			
	Under-developed	1,749	25%	1,312			
Medium Density Residential (R-8)	Vacant	311	15%	264	1,201	6 units/acre	7,206
	Partially-used	715	25%	536			
	Under-developed	535	25%	401			
Multifamily Residential (R-12)	Vacant	144	15%	122	611	10 units/ acre	6,110
	Partially-used	325	25%	244			
	Under-developed	327	25%	245			
Multifamily Residential (R-30)	Vacant	78	15%	66	267	25 units/ acre	6,675
	Partially-used	96	25%	72			
	Under-developed	172	25%	129			

Data availability

This guidance recognizes that the collection of data necessary to prepare the LCA may pose a challenge for some jurisdictions. In such cases, jurisdictions should use the best and most accurate information available and may use substitute sources, if all data sources and assumptions are thoroughly documented.

For example, if complete parcel-level information is not available on existing housing unit counts, jurisdictions may estimate achieved densities by evaluating a sample of representative parcels or by reviewing recently issued development permits in each zone. Similarly, jurisdictions may review a sample of representative mixed-use projects when setting assumptions about expected residential densities.

1.5 Calculate net residential capacity by zone

For each zone, subtract existing housing units from total residential capacity to determine net residential capacity.

1.6 Calculate additional capacity for ADUs on developed lots (Optional)

Changes to the housing element in 2021 call for jurisdictions to consider the role of accessory dwelling units (ADUs) in meeting housing needs. Changes in 2023 require jurisdictions to allow up to two ADUs per lot in urban growth areas, with the option for separate sale. Although capacity for ADUs has not typically been measured in a land capacity analysis, they are very likely to become important in meeting housing needs.

ADUs can be added to a developed parcel with an existing single-family home, and they may provide a lower cost housing option in areas where housing is typically more expensive, providing a way to help pay for a mortgage.

The optional methodology below provides general guidance for developing a reasonable estimate of capacity for new ADU production over the planning horizon. Jurisdictions should customize the assumptions described in the methodology below based on the best information available that reflects their local regulatory and market conditions.

- **Estimate total developed single-family lots where ADUs could be added.** Jurisdictions should document the zones where ADUs are allowed and estimate how many developed lots in these zones could add ADUs (either attached, detached, or conversion), based on local conditions. The feasibility of establishing an ADU on a given property depends on many site-specific factors, as well as the type of ADU to be added. Jurisdictions should generally consider the following factors, as applicable:

- What are the prevailing lot sizes and built square footage compared to maximum allowed lot coverage? (i.e., is there space to construct an attached or detached ADU?)
- Are there restrictions on the development of ADUs by local Homeowners Associations (HOAs)? And are they enforced?
- Are there septic drain fields or other utility infrastructure that would limit the construction of accessory structures?
- Any other site-level requirements established by the jurisdiction that would affect the ability to construct an ADU (property access, setbacks, etc.)?

Jurisdictions should thoroughly document all assumptions and screening criteria used, including data sources.

- **Determine a reasonable participation factor to account for owner preferences and site constraints.** Many property owners who can legally establish new ADUs on developed lots may choose not to do so, given the

significant associated cost and effort. Recommended participation factors could be as low as 1% in relatively weak real estate markets or as high as 10% in strong markets where lot sizes and infrastructure are conducive to ADUs.³²

The historic rate of ADU production or any recent gradual increase in ADU production in a jurisdiction may inform the starting point for a participation factor. Also consider the scope of changes to a city's ADU regulations that will be required based on 2023 legislative changes in HB 1337 and the impact those changes will have within the jurisdictions housing market.³³

It may also be helpful to develop different participation factors for each zone based on the different characteristics of housing in each zone. For example, zones with a lot of new development may have homes that have maximized the available lot coverage and have limited ability to add ADUs, therefore a low participation factor may be more appropriate compared to a zone that is primarily a first ring suburb with lots that have more space to build an ADU.

Apply the participation factor to the number of lots where ADUs could be constructed to estimate the number of lots likely to add ADUs during the planning period. For example, if the jurisdiction estimates 4,000 lots could accommodate ADUs and sets a 10% participation factor based on local market factors and flexibility in ADU development regulations, potential ADU lots would be calculated as follows:

$$4,000 \text{ lots} \times 10\% \text{ participation factor} = 400 \text{ potential ADU lots}$$

- **Account for the average number of ADUs permitted per lot.** Within urban growth areas, jurisdictions must allow up to two ADUs per lot over the next planning period based on recent changes to ADU regulations passed in 2023.³⁴ If this is the case in your jurisdiction, look at permitting applications or trends, demographic and housing data, and/or conduct resident surveys to determine what is the best assumption for the average number of ADUs that can be expected to be developed on lots that may have ADU production. Multiply this by the number of available lots to calculate ADU capacity:

$$400 \text{ potential lots} \times 1.25 \text{ ADUs per lot} = 500 \text{ total ADUs over 20 years}$$

1.7 Summarize total residential capacity

Jurisdictions should compile a summary of development capacity information for each zone and for ADUs in all zones (if applicable). Exhibit 9 shows an example development capacity summary table.

³² According to a study conducted by the Turner Center for Housing Innovation and the Urban Land Institute, in Portland, Seattle, and Vancouver, BC, ADUs accounted for only 3.0%, 0.8%, and 0.6%, respectively, of issued housing permits in 2009. In 2015, following key reforms in all three cities, this share had risen to 10.9%, 2.1%, and 6.3%, respectively. See Jumpstarting the Market for Accessory Dwelling Units report located here: https://turnercenter.berkeley.edu/wp-content/uploads/pdfs/Jumpstarting_the_Market_-_ULI.pdf.

³³ Seattle's ADU production rate increased significantly after ADU reforms in 2019. Total ADU permits, which had been largely steady for the past four years, increased by approximately 350% from 280 in 2019 to 988 in 2022. See Seattle's 2022 ADU Annual Report for more details: <https://www.seattle.gov/Documents/Departments/OPCD/OngoingInitiatives/EncouragingBackyardCottages/OPCD-ADUAnnualReport2022.pdf>. Cities such as Olympia, Burien, Tacoma and Kirkland have also seen increases in the permitting and production of ADUs after regulations were changed to make it easier to construct ADUs, but not to the extent that Seattle has.

³⁴ HB 1337 (2023), requires jurisdictions to allow two ADUs per lot within urban growth areas, by six months after the next periodic update due date. See [1337.SL.pdf \(wa.gov\)](https://leg.wa.gov/biennium/2023-24/Pdf/Bills/Session%20Laws/House/1337.SL.pdf?q=20230602124224) at <https://lawfilesexternal.wa.gov/biennium/2023-24/Pdf/Bills/Session%20Laws/House/1337.SL.pdf?q=20230602124224>.

Exhibit 9. Example summary table of development capacity by zone

Development capacity by zone

Zone	Net developable land (acres)	Assumed density (units/acre)	Gross residential capacity (units)	Existing housing on developable land (units)	Net residential capacity (units)
Single Family Residential (R-4)	2,924	2.5 units/acre	7,310	310	7,000
Medium Density Residential (R-8)	1,201	6 units/acre	7,206	206	7,000
Multifamily Residential (R-12)	611	10 units/acre	6,110	110	6,000
Multifamily Residential (R-30)	267	25 units/acre	6,675	75	6,600

ADU Capacity (all zones)

Lots available for ADUs	Participation factor	Potential ADU lots	Average ADUs per lot	Total ADU capacity
4,000	10%	400	1.25	500

Accounting for vacation homes and short-term rentals (Optional)

In some communities, a significant share of housing units are used as vacation homes or short-term rentals (STRs). These homes are effectively unavailable to house full-time residents. This constrains the local housing supply. Commerce's projected housing needs data accounts for the estimated number of existing vacation homes and short-term rentals in the baseline housing stock based on available Census data, and removes them from the current supply of units available to meet projected needs. However, Commerce's calculations of net new housing need only account for housing needed for the current and projected future full-time population. They do not account for any expected future demand for additional vacation homes or short-term rentals.

Jurisdictions that expect continued demand for new homes that will not be used for full-time residents have a few options for accounting for this demand in their housing elements.

- Treat this issue as a barrier to housing availability for full-time residents and refer to Chapter 4. Adequate provisions in this guidance to identify appropriate actions to overcome this barrier and implement these actions with the comprehensive plan.
- Analyze historic trends and/or conduct a market study to estimate the demand for these kinds of units over the planning period. Then subtract this number of units from capacity in the specific zones where the demand is expected. For example, if the demand appears to be exclusively in single-family areas with large lots, then subtract the estimated demand for housing from the capacity in only those relevant zones.

It may be appropriate to use some combination of both options, particularly if it is expected that actions are expected to take several years to implement and/or will not solve the problem entirely.

Note that if a jurisdiction accounts for demand for future vacation homes and STRs in their land capacity analysis, they cannot expand urban growth areas without documenting that the expansion is needed to accommodate capacity for allocated population and employment growth only (exclusive of vacation home/STR demand). See [RCW 36.70A.115\(1\)](#) and [WAC 365-196-310\(2\)\(e\)](#).

Step 2. Classify zones by allowed housing types and density level

Housing costs and affordability can vary significantly by housing type, and housing types and densities are determined in part by zoning and other local development regulations. For example, subsidized affordable housing projects are most feasible to produce in low-rise or mid-rise multifamily zones that allow for multi-unit housing production, such as apartment buildings.³⁵

The next step is to identify which housing types are allowed in each zone to facilitate relating each zone category to potential affordability levels.

The simplest approach is to classify zones into three or four categories, as shown in Exhibit 10. The first three categories may be most appropriate for smaller cities or suburban areas. Larger metropolitan cities may need one or more of the remaining categories, or to make other adjustments to categories to reflect local market conditions.

Exhibit 10. Example categories for classifying zones by housing types allowed

Zone category	Typical housing types allowed*
Low Density	Detached single-family homes
Moderate Density	Townhomes, duplex, triplex, quadplex
Low-Rise Multifamily	Walk-up apartments or condominiums (up to 3 floors)
Mid-Rise Multifamily	Apartments or condominiums in buildings with ~4-8 floors (~40-85 feet in height)
High-Rise/Tower**	Apartments or condominiums in buildings with ~9 or more floors (>85 feet in height) and requiring steel frame construction

* Manufactured homes are not listed as a housing type because by law they should be allowed in all zones.

** High-Rise/Tower zones are likely to be relevant only in major metropolitan cities.

After you identify appropriate zone categories for your jurisdiction, the next step is to associate each residential land use zone in the jurisdiction with a specific zone category. Exhibit 11 provides an example of how four different land use zones within a city could be classified using the first three zone categories from Exhibit 10.

When summarizing which housing types are allowed in each land use zone (column 2 in Exhibit 11), Commerce recommends focusing on housing types that are permitted by right, and not those that are only allowed by conditional use.³⁶ Note that there may be some level of judgement necessary to assign zone categories to appropriate land use zones. For example, the Medium Density (R-8) zone in this example allows for both single family and duplex construction. However, the zone does not allow for most of the housing types in the Moderate Density zone category. When assigning zone categories, also consider the predominant housing type developed in the zone. If historical trends show that homebuilders are almost exclusively building detached single-family units in this zone, then it would be most appropriate to classify it as Low Density for evaluating capacity to meet housing needs.

³⁵ High-rise zones that allow for building heights that require steel frame construction are not typically supportive of affordable housing production due to the higher cost per square foot.

³⁶ Only allowing a certain housing type by conditional use is a barrier that reduces the likelihood that housing type is included in new residential development.

Exhibit 11. Example of classifying land use zones using example zone categories

Land use zone	Housing types allowed	Max density level allowed	Assigned zone category
Single-Family Residential (R-4)	Detached single-family homes	4 units/acre	Low Density
Medium Density Residential (R-8)	Detached single-family homes, duplexes	8 units/acre	Low Density
Multifamily Residential (R-12)	Detached single-family homes, townhomes, duplexes, triplexes, quadplexes, 6-plexes	12 units/acre	Moderate Density
Multifamily Residential (R-30)	Apartments, townhomes	30 units/acre	Low-Rise Multifamily

In the Exhibit 11 example, the R-12 zone allows for several additional moderate density housing types than the R-8 zone and a maximum density level that is more typically associated with moderate density housing. This zone has characteristics that fall more clearly in the Moderate Density zone category; therefore, it should be classified that way.

Of course, it is possible historical trends could show that much of the development has been detached single-family production. If that were the case, it would still be appropriate to classify this zone as Moderate Density for summarizing capacity for future housing production because the zone allows for several moderate density housing types. However, it would be important for the jurisdiction to conduct an analysis of barriers to achieving the production of moderate density housing types and work to remove those barriers. Guidance on how to analyze these barriers and identify actions to address them is available in Chapter 4. Adequate provisions.

Step 3. Relate zone categories to potential income levels served

In order to ensure land capacity for all income segments, we need to make assumptions about the types of housing each household is likely to occupy. The goal of this step is to answer, based on local market conditions, the following questions:

- Which income levels are likely to be served by new market-rate housing production in each zone category?³⁷ For example, a zone category that allows single family housing will likely serve new market rate housing serving income levels of >120% AMI and possibly 80-120% AMI, while new multifamily housing may serve households earning 80-120% AMI and possible 50-80% AMI.
- In which zone categories is it feasible for affordable housing developers to produce new income-qualified affordable housing projects, assuming typical sources of funding and financing are available?^{38, 39}

³⁷ The cost of market-rate housing is dependent upon the balance of supply and demand. Housing shortages lead to increases in market-rate housing costs. If a jurisdiction provides additional capacity and reduces barriers to more market-rate housing development, this would be expected to reduce housing costs compared to taking no action. However, these market dynamics are complex and outside of the scope of a land capacity analysis.

³⁸ As discussed in [Updating Housing Targets for your Community](#) (Housing Element Book 1), some jurisdictions, working alone or in collaboration with neighboring jurisdictions, may consider the provision of vouchers to low-income households to help meet their housing needs. This kind of solution is not an alternative to showing capacity for new housing to meet projected housing needs at each income level. Vouchers are simply one way to subsidize housing, not a way to show capacity for housing at lower incomes.

³⁹ Income qualified affordable housing projects typically serve households making 0-30% and 30-50% AMI, and may also serve households making 50-80% AMI.

- In which zone categories is it feasible to produce new permanent supportive housing (PSH), assuming typical sources of funding and financing are available?⁴⁰

Answering these questions requires an analysis of local housing market conditions and housing affordability levels, as well as outreach to local affordable housing developers. Exhibit 12 provides an example of how the findings of this analysis can be summarized, based on typical housing market conditions in many parts of Washington state as of 2022. The final column summarizes a direct relationship between zone category and income level served.

These assumptions may be used as a starting point to estimate the affordability levels of new development if a more detailed market analysis is not possible in your jurisdiction. Commerce recommends jurisdictions customize the table based on the best available information for your jurisdiction as discussed in sections 3.1 and 3.2 below.⁴¹

Exhibit 13 shows a separate set of example assumptions for communities with relatively higher housing costs compared to the rest of the state (e.g., Seattle, East King County).⁴²

Inclusionary zoning and capacity

If a jurisdiction has an inclusionary zoning (IZ) program, can they include some of the capacity in that zone as <80% AMI?

–If a jurisdiction has a mandatory IZ program, it may assume that IZ requirement proportion as capacity in the <80% AMI bracket, so long as the IZ program requires housing at that affordability level. In other words, if a jurisdiction requires 10% of development in the H-1 zone be reserved for households making <80% AMI, 10% of the capacity in the H-1 zone can be categorized as <80% AMI housing. In this case, that proportion of capacity could be shown in a separate IZ Zone Category or added to an existing Zone Category that has an assumed affordability level of low income (<80% AMI).

–If a jurisdiction has a voluntary IZ program, it can include that portion of capacity that is likely to use the IZ program as low-income capacity (<80% AMI). In this case, jurisdictions should examine what their current voluntary IZ program (or a neighboring jurisdiction) has produced in terms of <80% AMI housing and use those same participation rates going forward.

In other words, if records show that only 5% of development in a zone has used the voluntary IZ program, only about 5% of the future capacity can assume to use IZ. If you layer on the requirement that 10% of that development is affordable to <80% AMI, then 0.5% of the development capacity in that zone can be assumed to qualify for the 0-80% AMI housing (10% of 5%).

A jurisdiction may also use a slightly increased amount of participation in a voluntary IZ program if it can document that market and regulations have changed enough to support that increase.

These same principles can be used for affordable housing density bonuses.

⁴⁰ Based on section 3 of HB 1220 (2021), [RCW 35A.21.430](#) states, “A code city shall not prohibit transitional housing or permanent supportive housing in any zones in which residential dwelling units or hotels are allowed.” Therefore, the LCA can treat PSH housing need as equivalent to other 0-30% AMI housing need in cities that allow PSH in zones that allow residential development. In other words, a zone that is suitable for providing capacity for 0-30% AMI housing should also be considered suitable for PSH. If a jurisdiction has occupancy, spacing or intensity of use restrictions on PSH, jurisdictions must analyze land capacity for PSH separately. Emergency housing is treated differently in this guidance, as described under Evaluating Capacity for Emergency Housing below.

⁴¹ Note that the final column in Exhibit 12 and Exhibit 13, “Assumed affordability level for capacity analysis,” is typically based on the “Lowest potential income level served with subsidies.” However, jurisdictions have discretion to select assumptions that best align with local conditions. For example, communities that expect much of the capacity in a zone would be absorbed by future market rate housing development that is more expensive than the affordability level possible with subsidies may wish to account for this fact during Step 5. One way to do this would be reviewing market-rate development trends in that zone and calculating how much of the capacity would be expected to be absorbed by new market-rate housing if those trends continue throughout the planning period. This expected housing could be added to the capacity for a higher income band and subtracted from the capacity available for lower income levels, such that the total capacity for new housing in the jurisdiction remains unchanged.

⁴² In expensive jurisdictions with high land costs, it may be necessary to define a density level threshold for determining which zones can support feasible affordable housing projects. For example, local affordable housing developers may indicate that they need zoning that allows at least 30 units per acre to make their typical projects pencil out. In this case, it may be appropriate to include density level criteria when grouping zones by category in Step 2.

Exhibit 12. Example of relating zone categories to housing types and income levels served in moderate-cost communities

Zone category	Typical housing types allowed	Lowest potential income level served		Assumed affordability level for capacity analysis
		Market rate	With subsidies and/or incentives	
Low Density	Detached single family homes	Higher income (>120% AMI)	Not typically feasible at scale*	Higher income (>120% AMI)
Moderate Density	Townhomes, duplex, triplex, quadplex	Moderate income (>80-120% AMI)	Not typically feasible at scale*	Moderate income (>80-120% AMI)
Low-Rise Multifamily	Walk-up apartments, condominiums (2-3-floors)	Low income (>50-80% AMI)	Extremely low and very low income (0-50% AMI)	Low income (0-80% AMI) and PSH
Mid-Rise Multifamily	Apartments, condominiums	Low income (>50-80% AMI)	Extremely low and very low income (0-50% AMI)	Low income (0-80% AMI) and PSH
ADUs (all zones)	Accessory Dwelling Units on developed residential lots	Low income (>50-80% AMI)	N/A	Low income (>50-80% AMI) – Group with Low-Rise and/or Mid-Rise Multifamily

* See discussion in 3.2 below.

Exhibit 13. Example of relating zone categories to housing types and income levels served in higher-cost communities

Zone category	Typical housing types allowed	Lowest potential income level served		Assumed affordability level for capacity analysis
		Market rate	With subsidies and/or incentives	
Low Density	Detached single family homes	Higher income (>120% AMI)	Not feasible at scale*	Higher income (>120% AMI)
Moderate Density	Townhomes, duplex, triplex, quadplex	Higher income (>120% AMI)	Not typically feasible at scale*	Higher income (>120% AMI)
Low-Rise Multifamily	Walk-up apartments, condominiums (2-3-floors)	Moderate income (>80-120% AMI)	Extremely low, very low, and low-income (0-80% AMI)	Low income (0-80% AMI) and PSH
Mid-Rise Multifamily	Apartments, condominiums	Moderate income (>80-120% AMI)	Extremely low, very low, and low-income (0-80% AMI)	Low income (0-80% AMI) and PSH
High-Rise/Tower	Apartments, condominiums	Higher income (>120% AMI)	Moderate income (>80-120% AMI)	Moderate income (>80-120% AMI)
ADUs (all zones)	ADUs on developed residential lots	Moderate income (>80-120% AMI)	N/A	Moderate income (>80-120% AMI)

* See discussion in 3.2 below.

Note that to count a zone's capacity towards the 0-30% PSH housing need in later steps requires the jurisdiction to allow PSH to be allowed in that zone.

3.1 Calculate the affordability of housing by type/zone category (Optional)

To develop customized assumptions about the income levels served by different types of new housing, jurisdictions can start by reviewing available data about the median rents and list prices for housing in their communities. Exhibit 14 includes recommended data sources that are available in many communities across Washington. However, jurisdictions can also reference the rents or sales prices of newly developed homes to get a more accurate assessment of what the market is producing in their area.

Exhibit 14. Recommended data sources for local market-rate housing costs

Housing type / Zone category	Data sources (select one per category)	Notes
Detached Single Family	Washington Center for Real Estate Research, Market Data Toolkit – Housing Prices by Area	Identify the median sales price for single-family homes in your city/place.
	Redfin, Monthly Housing Market Data	
Townhome / Middle Housing	Washington Center for Real Estate Research, Market Data Toolkit – Housing Prices by Area	Identify the median sales price for townhomes in your city/place.
	Redfin, Monthly Housing Market Data	
Apartments and Accessory Dwelling Units (ADUs) ⁴³	Washington Center for Real Estate Research, Market Data Toolkit – Rental Housing Markets Zillow Observed Rent Index (ZORI)	Identify the median or average rent for your city/place.

Next, convert these median housing costs to affordability levels based on the county area median income. For rental housing, the Washington State Housing Finance Commission (WSHFC) and the U.S. Department of Housing and Urban Development (HUD) publish regional rent thresholds that determine the maximum rent that is affordable to a household of a given size with income at a given percentage of AMI.⁴⁴

For ownership housing, there are many calculators online for determining the income needed to afford a new home.⁴⁵ For example, Fannie Mae has a [Mortgage Calculator](#) where you enter the home purchase price, down payment, loan term and interest rate.⁴⁶ It then calculates the total monthly payment. The formula to convert a monthly payment to household income needed is:

$$\text{Annual Household Income Needed} = (\text{Monthly payment} / 0.3) * 12$$

Then you can calculate the income level as a percentage of AMI as follows:

$$\text{Income level as percent of AMI} = \text{Annual household income needed} / \text{Area Median Income (AMI)}$$

⁴³ Assume that ADU rents are on par with apartment rents unless a better local source of information is available.

⁴⁴ To view income and rent limits for your county, go to <https://www.wshfc.org/managers/map.aspx> and click “Full List of 2023 Limits by County.” In these tables, “Median Income” represents AMI for the county. Income level relative to AMI is shown in the “Set-aside Percentage” column. To determine income limits by household size for 120% of AMI, simply multiply the income limit for 80% AMI by 1.5.

⁴⁵ Examples include [Fannie Mae Mortgage Calculator](https://fm.fanniemae.com/homeownership/resources/financial-calculators/mortgage-calculator) (<https://fm.fanniemae.com/homeownership/resources/financial-calculators/mortgage-calculator>), [Zillow Mortgage Calculator](https://www.zillow.com/mortgage-calculator) (<https://www.zillow.com/mortgage-calculator>) or Redfin’s [How much house can I afford?](https://www.redfin.com/how-much-house-can-i-afford) (<https://www.redfin.com/how-much-house-can-i-afford>).

⁴⁶ These calculators typically provide current interest rates, down payment and local tax assumptions that can be adjusted if you have better local data available.

You can use these formulas to calculate income levels needed to afford a single-family home or townhome using data from one of the sources listed in Exhibit 14. This approach assumes a 4-person household. However, the average household size in most jurisdictions is closer to three people. Therefore, it may be appropriate to first adjust AMI to reflect a 3-person household. To do this, multiply AMI by 0.9.⁴⁷

If your jurisdiction is too small to be included among those covered by the data sources in Exhibit 14, there are a few options to consider:

- Use the default assumptions in Exhibit 12 or Exhibit 13.
- Assume housing costs are equivalent to those of the surrounding county and use one of the data sources above to pull data about median housing costs countywide.

You may choose to use a [pro-forma tool developed by Cascadia Partners](#) in coordination with Commerce to determine how affordable middle or infill housing might be with custom regulatory inputs.⁴⁸ In other words, a jurisdiction can enter information about the density, height, setback, parking and other restrictions of a zone, in combination with land values, and determine what income level housing in that zone could serve. More details on this tool are available on Commerce's middle housing webpage under "[Middle Housing Resources](#)".⁴⁹

3.2 Identify zone categories that can support feasible subsidized affordable and supportive housing (Optional)

There are two primary sources of information to help jurisdictions identify zoning characteristics that make subsidized affordable housing projects most feasible, including permanent supportive housing (PSH).⁵⁰ First, review completed affordable housing projects built in your jurisdiction or other jurisdictions with similar market characteristics and identify the types of housing and achieved densities (units/acre) that have proven feasible in the past.⁵¹ Second, conduct outreach to local or regional affordable housing developers and ask what zoning

Middle housing legislation and additional capacity for affordable units

With the next periodic update, jurisdictions required to implement middle housing with HB 1110 (2023) must allow increased development potential if some of the units are affordable. Although generally middle housing will not support households earning under 80% of AMI, in these specific circumstances that assumption would not remain true.

So how much capacity under 80% AMI can a jurisdiction count with HB 1110 middle housing legislative updates?

If there is a precedent in a jurisdiction for affordable housing density bonuses to yield affordable housing, or a comparable jurisdiction with a similar housing market yields such housing, a jurisdiction may use this information to assume a very small percentage of new units might develop in the <80% AMI income bracket.

For general recommendations on projecting capacity under HB 1110 (2023), see the sidebar with [Step 1.4 Calculate gross residential capacity by zone](#) (above).

⁴⁷ This is consistent with HUD's methodology for adjusting HUD Median Family Income for household size.

⁴⁸ Pro-forma tool for the state: <https://deptofcommerce.box.com/s/cspjhl2vbr47yovggxtszdd5s7w03q9o>.

⁴⁹ <https://www.commerce.wa.gov/serving-communities/growth-management/growth-management-topics/planning-for-middle-housing/>.

⁵⁰ The 2021 housing element updates identify permanent supportive housing (PSH) and emergency housing as housing types localities must plan for and accommodate. Permanent supportive housing is subsidized, leased housing for people who are experiencing homelessness or are at risk of homelessness and living with a disabling condition. PSH a long-term housing solution and included in the housing need projections as a subset of 0-30% AMI housing units. Emergency housing is temporary accommodations for households who are experiencing homelessness or are at imminent risk of becoming homeless. These facilities are described in a later section of this guidance, and the ability of localities to accommodate projected needs for emergency housing is evaluated independently from permanent housing supply.

⁵¹ Note that development feasibility for affordable housing projects depends upon more than just density level. Other development regulations such as parking requirements can also have a major impact. The impacts of these regulations are considered in the following chapter on identifying barriers to housing production.

characteristics they look for when identifying locations for feasible affordable housing projects, given the kinds of funding and financing resources that are typically available.

Keep in mind, in some communities, nonprofit affordable housing developers such as Habitat for Humanity build affordable housing projects at moderate or low-density levels. However, these projects are typically very small in scale, particularly compared to the overall volume of housing need. Higher density zoning that allows for multi-unit housing types like apartments is typically necessary to support projects that make the most efficient use of subsidies by reducing the cost of new housing per unit.

The findings of this analysis may prompt reconsideration of the categories or thresholds in Step 2. For example, if local affordable housing providers indicate that they really need at least 30 units per acre in allowed density to make their projects feasible, it may make sense to include density level thresholds for grouping land use zones by zone category. It may also make sense to add an additional zone category in Step 2.

Step 4. Summarize capacity by zone category

The next step is to summarize land capacity for housing unit production by zone category. Exhibit 15 provides a simple example that builds on the land use zones and zone categories shown in Exhibit 11.

Exhibit 15. Example of summarizing capacity by zone category

Zone	Unit capacity	Assigned zone category	Capacity in zone category
Single Family Residential (R-4)	7,000	Low Density	14,000
Medium Density Residential (R-8)	7,000		
Multifamily Residential (R-12)	6,000	Moderate Density	6,000
Multifamily Residential (R-30)	6,600	Low-Rise Multifamily	6,600
ADUs	500	ADUs	500

Step 5. Compare projected housing needs to capacity

In this step, compare the jurisdiction’s projected housing needs by income level to capacity to determine if there is sufficient capacity to accommodate needs at all income levels. Exhibit 16 extends the same example from above to show this comparison.

The “Projected housing need” column shows the jurisdiction’s allocation of need by income group, as well as for PSH. These needs are aggregated into the zone categories that match those in the leftmost column of Exhibit 12. Next, it shows total housing needs for all income levels in each zone category in the “Aggregated housing needs” column and the capacity for those zone categories from Exhibit 15. The rightmost column simply compares capacity to housing need to calculate the surplus or deficit of capacity by zone category.

Exhibit 16. Example comparison of projected housing needs to capacity

Income level (% AMI)	Projected housing need	Zone categories serving these needs	Aggregated housing needs	Total capacity (From Exhibit 15)	Capacity surplus or deficit
0-30% PSH	2,000	Low-Rise Multifamily + ADUs	13,000	7,100	-5,900
0-30% Other	4,000				
>30-50%	3,000				
>50-80%	4,000				
>80-100%	2,000	Moderate Density	5,000	6,000	1,000
>100-120%	3,000				
>120%	6,000	Low Density	6,000	14,000	8,000
Total	24,000		24,000	27,100	3,100

When total projected housing needs (24,000) are compared to total capacity for housing growth (27,100), this analysis shows a surplus of capacity overall. However, when capacity for each zone category is compared to housing need at the associated income levels, this analysis shows a significant deficit of capacity for housing with potential to serve households at 80% AMI or below, and a significant surplus of units in the Low-Density category. This indicates there is not enough appropriately zoned capacity to meet all the housing needs in this jurisdiction. The jurisdiction will need to do additional work to show how it can provide capacity to meet all housing needs and document the necessary actions in its housing element. Step 6 below provides a detailed discussion of the process for applying corrective actions to address a lack of capacity.

If a jurisdiction has sufficient land capacity after Step 5, proceed to Step 7 and identify the number of units that need subsidies or incentives to be built. This information is needed to complete a jurisdiction's adequate provisions work under RCW 36.70A.070(2)(d).

Contributing funds to regional affordable housing

Creation of affordable housing involves many funding sources and organizations. Therefore, some jurisdictions in Washington have decided to pool resources and local funding streams to fund affordable housing in a region, even though the affordable housing may not be developed in every jurisdiction that contributes resources. In this and similar cases, jurisdictions may decide collectively how the contribution to affordable housing can be documented consistently by all jurisdictions who have pooled resources.

This contribution does not change each jurisdiction's responsibility to plan for and accommodate the housing needs allotted to the jurisdiction with respect to land capacity. In other words, each jurisdiction must still have sufficient land capacity for their share of countywide housing needs, irrespective of contributions. It may, however, provide a way to shift needs to the recipient jurisdiction at the countywide level in the allocation process.

Each jurisdiction may acknowledge their contribution in their housing element to show part of their efforts to "make adequate provisions for existing and projected housing needs." Nevertheless, this documentation of contribution does not eliminate the need for a jurisdiction to show sufficient capacity for their share of countywide housing needs and complete the identification of barriers and actions to address affordable housing needs, including gaps in funding.

Addressing residential growth in the development pipeline and development since 2020

As described in Step 1.1, properties in the permit pipeline should be assumed to develop consistent with their permit applications and should be excluded from the land capacity analysis. While these properties do not provide capacity for future residential development yet, the anticipated development may be counted toward meeting a jurisdiction's projected housing needs.

Similarly, residential development that has occurred since April 1, 2020 (the base year for the projected housing needs) may be classified as pipeline development and counted toward meeting projected housing needs. For example, if a city or county prepares their LCA using 2023 parcel data, properties that were developed in 2021-2023 would be classified as pipeline, and these housing units would be deducted from the jurisdiction's projected housing needs.

When comparing projected housing needs to capacity in Step 5, jurisdictions should account for pipeline development as follows:

- **Assign pipeline units to potential income levels served:** Using the guidelines in Step 3, assign the housing units for each pipeline project to the income level they are likely to serve, as shown in Exhibit 12, Exhibit 13, or the cities custom developed crosswalk table. This assignment should be based on the type of housing units (rather than zoning) and whether the units are market-rate or subject to subsidies/incentives.
- **Calculate remaining projected housing need by income category:** Calculate the total number of pipeline housing units in each of the income categories shown in Exhibit 16 and deduct these units from the corresponding projected housing need by income category. This represents the housing need remaining to be met during the planning period.
- **Compare residential capacity to remaining housing need:** Compare the available residential capacity in each income category to the remaining housing need, as described in Step 5.

Step 6. Revise zoning if needed to address unmet housing needs

If the comparison in Step 5 above shows a lack of capacity in one or more income categories, jurisdictions must identify and implement actions to address the projected deficit. This could be accomplished by rezoning selected developable lands to higher densities (e.g., from Single Family Residential (R-4) to Multifamily Residential (R-12)) or by amending existing zones to allow greater density (e.g., change the maximum density for the entire Moderate Density Residential zone from 8 units per acre to 12 units per acre).

Under GMA, it is required that any zoning changes necessary to show sufficient capacity be implemented prior to or concurrent with the adoption of the comprehensive plan or periodic update.⁵² The action could be in connection with major planning efforts already scheduled or in progress (subarea plans, planned actions, comprehensive plan periodic updates, etc.). Jurisdictions should also be aware that amendments to zoning or associated development regulations may also require additional time for environmental review under the State Environmental Policy Act (SEPA), including analysis of infrastructure conditions.

Jurisdictions should document the extent of any such zoning actions, the anticipated net increase in capacity as a result, and the assumptions used to calculate the additional capacity, including analysis of infrastructure conditions.

⁵² [RCW 36.70A.115](#) states that "Cities and counties must "ensure that, taken collectively, adoption of and amendments to their comprehensive plans **and development regulations** provide sufficient capacity of land suitable for development within their jurisdictions to accommodate their allocated housing and employment growth..."

Exhibit 17 illustrates example rezoning adjustments to residential capacity to address an identified deficit. In this example, a jurisdiction chose to increase zoning capacity across zones, focused on increasing capacity around transit and amenity areas. By increasing zoning capacity in these areas, the jurisdiction is adding capacity in areas with increased transit options, supporting services and infrastructure. Overall, this approach results in a net increase in capacity in the Multifamily Residential (R-30) zone that offsets the identified deficit in the under 80% AMI housing need category.

Specifically, these changes include:

- Shifting 200 acres from the Single Family Residential (R-4) zone to the Medium Density Residential (R-8) zone,
- Shifting 200 acres from the Medium Density Residential (R-8) zone to the Multifamily Residential (R-12) zone, and
- Shifting 240 acres from the Multifamily Residential (R-12) zone to the Multifamily Residential (R-30) zone.

The change reduced capacity in the moderate-income category (>80-120% AMI) and the above 120% AMI category, but not enough to eliminate the existing surplus at these income levels.

Exhibit 17. Example of adjusted residential development capacity by zone

Zone	Zoning changes (developable acres)*	Net zoning changes (acres)	Assumed density (units/acre)	Residential capacity adjustment (units)	Zone category
Single Family Residential (R-4)	-200 ac (to R-8)	-200	2.5 units/acre	-500	Low Density
Medium Density Residential (R-8)	+200 ac (from R-4) -200 ac (to R-12)	0	6 units/acre	0	Low Density
Multifamily Residential (R-12)	+200 ac (from R-8) -240 ac (to R-30)	-40	10 units/acre	-400	Moderate Density
Multifamily Residential (R-30)	+240 ac (from R-12)	+240	25 units/acre	+6,000	Low-Rise Multifamily

* Note: This column refers to the number of acres that would need to be rezoned after accounting for any relevant deductions for critical areas, infrastructure, or market factor. Therefore, the full gross acres rezones would likely need to be higher. This table is simplified and shows the net acres (after deduction).

What if capacity exceeds housing needs?

It is likely with zoning changes to allow increased capacity for lower-income housing needs, jurisdictions may have more capacity than their housing needs allocation. Although comprehensive plans are to plan for a twenty-year period, land use decisions extend beyond twenty years. It is important that we make the best use of land that is designated for urban uses, recognizing that urban growth areas can only be increased if they lack capacity for twenty years of growth. Therefore, as long as jurisdictions have sufficient capacity to meet their housing needs at all income levels, there is no requirement that jurisdictions need to downzone other areas if capacity exceeds housing needs.

Jurisdictions should consider the above information collectively with any countywide and/or multicounty planning policies that direct growth patterns. For jurisdictions in the Central Puget Sound area, please see [PSRC Plan Review and Comprehensive Plan's Frequently Asked Questions](#), specifically the questions on Growth Targets, Capacity and Housing.

Income level (% AMI)	Projected housing needs	Zone categories serving these needs	Aggregated housing needs	Capacity prior to zoning adjustment (From Exhibit 15)	Rezoning capacity adjustments	Adjusted capacity surplus or deficit
0-30% PSH	2,000	Low-Rise Multifamily + ADUs	13,000	7,100	+6,000	100
0-30% Other	4,000					
>30-50%	3,000					
>50-80%	4,000					
>80-100%	2,000	Moderate Density	5,000	6,000	-400	600
>100-120%	3,000					
>120%	6,000	Low Density	6,000	14,000	-500	7,500
Total	24,000		24,000	27,100	+5,100	8,200

When developing a re-zoning proposal, jurisdictions must consider the potential for displacement as well as appropriate mitigation strategies. See Commerce’s [Guidance for Addressing Racially Disparate Impacts](#) for guidance on policies to reduce or mitigate displacement risk.

Step 7. Identify future housing capacity that requires subsidies

Since land capacity alone is insufficient to serve extremely low, very low and some low-income households, jurisdictions should also identify the amount of housing capacity that would likely require subsidies or incentives to serve the households at planned income levels.^{53, 54} To determine the number of units that would likely require subsidies or incentives, use the information from previous LCA steps.

In Step 3, each jurisdiction identified in which zoning categories it is feasible for affordable housing developers to produce new income-qualified affordable housing projects, assuming typical sources of funding and financing are available. For example, if a jurisdiction’s housing market aligned with moderate-cost communities (Exhibit 12), housing in the low-rise and mid-rise multifamily zoning categories could serve households in the 0-30% and 30-50% AMI income levels with subsidies as shown in Figure 18. These subsidies or incentives would allow for the combination of zoning and incentives to result in new development serving households at these incomes.

Note that it is unlikely that subsidies in many communities would serve single-family homes, moderate density housing such as duplexes and townhomes, or ADUs at a scale that would have a significant impact on a jurisdiction’s housing needs.⁵⁵ If subsidies generally serve these households in your jurisdiction at any scale, Commerce recommends including a discussion of these subsidy patterns in the land capacity analysis if your jurisdiction assumes affordability patterns different than those in Exhibits 12 and 13.

⁵³ Futurewise, Kian Bradley, and Trevor Reed v. City of Mercer Island (2025), p. 23.

⁵⁴ In some very high-cost communities, some moderate-income housing (80-120% AMI) may require subsidies or incentives to be produced at prices affordable to those households.

⁵⁵ See discussion in LCA Step 3.2.

Exhibit 18. Future housing needs that are feasible with subsidies or incentives

Exhibit 12. Example of relating zone categories to housing types and income levels served in moderate-cost communities

Zone category	Typical housing types allowed	Lowest potential income level served		Assumed affordability level for capacity analysis
		Market rate	With subsidies and/or incentives	
Low Density	Detached single family homes	Higher income (>120% AMI)	Not typically feasible at scale*	Higher income (>120% AMI)
Moderate Density	Townhomes, duplex, triplex, quadplex	Moderate income (>80-120% AMI)	Not typically feasible at scale*	Moderate income (>80-120% AMI)
Low-Rise Multifamily	Walk-up apartments, condominiums (2-3-floors)	Low income (>50-80% AMI)	Extremely low and Very low income (0-50% AMI)	Low income (0-80% AMI) and PSH
Mid-Rise Multifamily	Apartments, condominiums	Low income (>50-80% AMI)	Extremely low and Very low income (0-50% AMI)	Low income (0-80% AMI) and PSH
ADUs (all zones)	Accessory Dwelling Units on developed residential lots	Low income (>50-80% AMI)	N/A	Low income (>50-80% AMI) – Group with Low-Rise and/or Mid-Rise Multifamily

Using this information, identify the number of future housing units that require subsidies or incentives from Step 5 or 6. Using the example from above, Exhibit 19 shows that in addition to the zoning to allow the capacity, at least 9,000 units of the example jurisdiction's total future housing needs would require subsidies or incentives to be built.

Exhibit 19. Future housing needs that are feasible with subsidies or incentives

Income level (% AMI)	Projected housing needs	Zone categories serving these needs	Aggregated housing needs	Rezoning capacity adjustments	Adjusted capacity surplus or deficit	Units requiring subsidies or incentives
0-30% PSH	2,000	Low-Rise Multifamily + ADUs	13,000	+6,000	100	2,000
0-30% Other	4,000					4,000
>30-50%	3,000					3,000
>50-80%	4,000					0
>80-100%	2,000	Moderate Density	5,000	-400	600	0
>100-120%	3,000					0
>120%	6,000	Low Density	6,000	-500	7,500	0
Total	24,000		24,000	+5,100	8,200	9,000

If a jurisdiction's analysis indicates units will require some sort of subsidy or incentive to be built and operate at rents that are affordable to households, jurisdictions should evaluate the subsidies, incentives, and funding gaps that could serve these households in the Adequate Provisions section of their housing element (see Chapter 4).

What if there is not enough capacity?

If your land capacity analysis shows there is insufficient capacity to meet new housing demand or does not allow for the types of housing in greatest need, you should first consider increasing allowed residential densities and housing types within existing zones to increase capacity. When new capacity is added, it is beneficial for jurisdictions to evaluate if the new capacity is in areas with the greatest opportunity. To do this, map land capacity along with "opportunity" factors such as public transportation, job centers, schools and amenity clusters. Note the areas in the community where zoned capacity is low, while opportunities are present. These may be focus areas for zoning and land use changes.

These zoning changes should consider the housing types and densities that will meet the unmet capacity needs identified in Step 5. To be consistent with GMA goals, these increases in density and housing types should first be focused around areas with jobs, transit and infrastructure to allow more people close access to these community services.

Other options to explore additional capacity for housing needs include the following sequence:

- 1) Examine other zones that are under-developed, such as areas with excess commercially-zoned land that have the potential for mixed-use or residential development. Increasing densities in existing zones or encouraging redevelopment of excess commercial land can leverage your existing infrastructure investments.
- 2) Consider increasing capacity in areas that are zoned low density and that have infrastructure.
- 3) Consider planning new infrastructure for areas with under-developed or undeveloped parcels. In the case of planning new infrastructure to serve capacity, address needed public investments in infrastructure in the capital facilities element.
- 4) Review urban growth areas to determine if adjusting UGA boundaries may allow the inclusion of areas more suitable for urban development through an UGA boundary revision under [RCW 36.70A.110\(8\)](#) (i.e., UGA swap).
- 5) Review if excess capacity exists in UGAs within the county and adjust allocations of housing need within existing UGAs.^{56, 57}
- 6) Only once all other steps have been considered, jurisdictions may consider expanding the UGA boundary in areas suitable for development if there is insufficient capacity to accommodate growth. Expanding UGA boundaries should include coordination with neighboring jurisdictions and the county and consideration of the cost of providing infrastructure in new areas. For more information, refer to Commerce's [Draft Urban Growth Area Guidebook](#) (2025).

Additionally, if an examination of affordability shows there are not enough ownership units at the low end of the spectrum, then increasing density through land use and zoning changes to allow smaller and more

⁵⁶ RCW 36.70A.130(3)(c)(vi): The urban growth area is not larger than needed to accommodate the growth planned for the succeeding 20-year planning period and a reasonable land market supply factor.

⁵⁷ WAC 365-196-310(5)(d)(iv): If future growth forecasts exceed the current combined capacities of unincorporated county and city lands, counties and cities should first consider the potential of increasing capacity of existing urban areas through allowances for higher densities, or for additional provisions to encourage redevelopment. If counties and cities find that increasing the capacity of existing urban areas is not feasible or appropriate based on the evidence they examine, counties and cities may consider expansion of the urban growth area to meet the future growth forecast.

attached units may be an important strategy. When adding attached units as an allowed use, it may be useful to reconsider the use of unit-per-acre based densities (e.g., seven units per acre). Instead consider minimum lot size (e.g., 6,000 square feet) or "unit density" (e.g., minimum number of dwelling units on a lot, not on a per acre basis⁵⁸) so that a given parcel is able to add units through attached housing types and not be limited by density restrictions. Consider infrastructure with these changes.

Land available to meet other housing needs

In addition to reviewing land capacity for all income levels, jurisdictions should also review if they have land zoned to allow for the development of other housing types within the jurisdiction. The housing element requires fully planning local governments to identify "sufficient land for housing, including, but not limited to, ... manufactured housing, multifamily housing, group homes, foster care facilities, emergency housing, emergency shelters, [and] permanent supportive housing" ([RCW 36.70A.070\(2\)](#)).

In response to HB 1220 (2021), cities will need to allow emergency housing and shelters as discussed in the following section and allow permanent supportive housing (PSH) and transitional housing in all zones that allow residential development and hotels.⁵⁹

Additionally, this is the opportunity for communities to examine the gap between the community's housing needs and housing inventory in a jurisdiction's housing needs analysis to see if there are sufficient facilities for community needs such as group homes, memory care or assisted living facilities, or unique other housing needs such as behavioral health care facilities. The land capacity analysis provides the opportunity to determine whether there is enough land zoned to allow construction of these other types of needed housing.

During this analysis, jurisdictions should also consider if available land for these housing types is located in areas with sufficient infrastructure and amenities, such as transit and other services.

Evaluating capacity for emergency housing needs

This section provides guidance on demonstrating capacity for emergency housing needs. This guidance treats these needs somewhat differently in part because they are treated differently in Commerce's housing needs projection methodology (see that titled section in Commerce's [Establishing Housing Targets for your Community](#), 2023). Specifically, the methodology for projecting emergency housing assumes that all jurisdictions make only limited progress in addressing housing needs for all income levels.

Due to that assumption, each county's projection of future emergency housing needs is higher than it would be if that county were successful at building enough housing affordable at each income level. This is because the lack of availability of affordable housing is a primary driver of homelessness and housing instability. Therefore, if each jurisdiction planned for enough capacity to meet their entire allocation of housing needs at each income level (including permanent supportive housing) and planned for enough additional capacity to accommodate its full allocation of emergency housing needs, then it would be providing more than sufficient capacity to accommodate all projected housing needs.

To address this issue, this guidance for demonstrating land capacity for emergency housing needs is designed to avoid double-counting housing needs that would be accommodated if the jurisdiction were successful at providing for housing needs at all income levels.

⁵⁸ As introduced with HB 1110 (2023) or with HB 1337 (2023).

⁵⁹ See [RCW 35.21.683](#) and [RCW 35A.21.430](#) for these requirements.

Statutory requirements for emergency housing

While HB 1220 (2021) included requirements for all fully planning jurisdictions (counties and cities) to plan for current and projected emergency housing needs, it also added new requirements only for cities that limit development regulations related to the siting of emergency housing and emergency shelter. These requirements are codified as [RCW 35A.21.430](#) and [RCW 35.21.683](#). Specifically, a city may not prohibit indoor emergency housing (which includes traditional shelter arrangements) in any zones in which hotels are allowed, except in such cities that have adopted an ordinance authorizing emergency housing in a majority of zones within a one-mile proximity to transit.^{60, 61}

While it is mandatory that cities make changes to zoning regulations to comply with this requirement, they may adopt reasonable occupancy, spacing and intensity of use requirements by ordinance on indoor emergency housing and indoor emergency shelters to protect public health and safety. However, these regulations must not be so restrictive that they prevent the development of a sufficient number of emergency housing beds to meet the community's identified needs.

Additionally, the housing element updates in 2021 updated the land capacity requirements in [RCW 36.70A.070\(2\)\(c\)](#) to require that each jurisdiction identify sufficient capacity of land for a variety of housing types, including emergency housing and emergency shelters. Therefore, if a city receives an allocation of emergency housing need but does not allow indoor emergency housing or indoor emergency shelters in their jurisdiction, they will need to revise their development regulations to allow for such uses.

If a city chooses not to allow hotels and has no transit, per the two requirements of sections RCW 35A.21.430 and RCW 35.21.683, the city must still show sufficient capacity for the allocated emergency housing need to be consistent with the updated housing element requirements on land capacity (RCW 36.70A.070(2)(c)).⁶²

Commerce recommends the same standards noted above be used by counties that must plan for emergency housing needs.

Engagement with service providers

Prior to this capacity analysis, jurisdictions are encouraged to understand the specific emergency housing demands, constraints and opportunities within their communities by engaging with their local providers of shelter services and street outreach. These groups can inform the local details of emergency housing and shelter development feasibility and the assumptions in this capacity analysis. Feedback from these stakeholders and current providers can help the jurisdiction understand whether emergency shelters or emergency housing may be more likely to be developed and at what densities. A jurisdiction may also choose to set their local emergency housing need higher than the need allotted to them based on this local feedback.

⁶⁰ In this section, "emergency housing" is inclusive of both indoor emergency shelters and indoor emergency housing as referenced in HB 1220 (2021).

⁶¹ [HB 1220 \(2021\)](#) – see Sections 3 and 4, now codified as [RCW 35A.21.430](#) and [RCW 35.21.683](#).

⁶² Some jurisdictions may choose to coordinate with neighboring jurisdictions to collectively address emergency housing needs. While such actions are encouraged, these actions do not release individual jurisdictions from the requirement to show capacity to address their own allocation.

Guidance for occupancy, spacing and intensity regulations

Jurisdictions may adopt reasonable occupancy, spacing and intensity of use requirements by ordinance on indoor emergency housing and indoor emergency shelters to protect public health and safety. When considering these regulations, the jurisdictions should carefully consider [RCW 35A.63.240](#) (code cities) and [RCW 36.70.990](#) (counties). These statutes state no city or county “may enact or maintain an ordinance, development regulation, zoning regulation or official control, policy, or administrative practice which treats a residential structure occupied by persons with handicaps differently than a similar residential structure occupied by a family or other unrelated individuals.” As used in these sections, “handicaps” are as defined in the federal fair housing amendments act of 1988.⁶³

Consider the following additional guidance when placing occupancy, spacing and/or intensity of use requirements on emergency housing or emergency shelters.

Occupancy

Commerce recommends occupancy for emergency shelters and emergency housing be established as required by the jurisdiction’s adopted building, fire and safety codes. Jurisdictions should carefully consider [RCW 35.21.682](#), [RCW 35A.21.314](#) and [RCW 36.01.227](#). These statutes state cities and counties may not regulate or limit the number of unrelated people that may occupy a dwelling unit except as provided for in state law, for short-term rentals or by occupant load per square foot.

Spacing

Spacing with respect to emergency housing refers to the distance between facilities. Emergency housing and shelters meet a broad spectrum of service needs and may have an unpredictable demand for services. Therefore, requiring spacing between uses of a similar type or between emergency housing and shelters and support services may increase the likelihood of loitering, littering and camping around service delivery sites. This is particularly true in communities where there is a significantly higher demand for services than can be met. Allowing for campus type settings, where a variety of services can be provided at the same site, will likely remove some of the external impacts felt by neighbors.

If any spacing requirement is adopted, Commerce recommends connecting any spacing requirements directly to public health and safety, but they should not exceed the spacing required by RCW [9.94A.030\(6\)](#), which create community protection zones of 880 feet from incompatible uses that have a clear connection to public safety.

Intensity

Intensity with respect to emergency housing may refer to the density of people, transportation and/or services needed by the participants who live in a single location or facility. Commerce does not recommend any blanket intensity regulations for these use types. Some neighborhoods may feel they are being asked to accommodate more than their fair share of these housing types because of a unique combination of historical development trends, market conditions, property values, zoning and land use regulations. Standards adopted to encourage a scattered approach to the siting of these services to ensure they are not located in only one area of the jurisdiction may become necessary. Other appropriate intensity regulations may include encouraging

⁶³ The [1988 amendments](#) add protections for families with children and persons with physical or mental disabilities. It defines handicap as: (1) a substantially limiting physical or mental impairment; (2) a record of having such an impairment; or (3) being regarded as having such an impairment. The law stipulates that the following shall not be considered a handicap: (1) current illegal use of or addiction to a controlled substance; and (2) transvestism. <https://www.congress.gov/bill/100th-congress/house-bill/1158>

emergency shelter and housing close to transit, employment, social and health services, and other resources that help in stabilization.

Intensity regulations may become useful as a jurisdiction nears or exceeds achievement of the allocated emergency housing and shelter needs, supporting a focus of future development on permanent supportive housing units rather than emergency shelters and housing.⁶⁴

Determining whether an LCA for emergency housing is necessary

Fully planning jurisdictions must do a quantitative LCA for emergency housing needs to show sufficient capacity for their allotted share of countywide emergency housing needs ([RCW 36.70A.070\(2\)\(c\)](#)). An LCA for emergency housing should be completed at the same time as the LCA for all housing needs described in Steps 1-6 above.

Recommended LCA approach for emergency housing

The following process is the recommended approach to document sufficient land capacity for a jurisdiction's local share of countywide emergency housing needs.⁶⁵ This analysis should be included with the LCA performed for permanent housing needs in a jurisdiction's housing element supporting documentation. Alternative capacity analysis methods are possible with sufficient documentation.

When completing an emergency housing LCA, land included in the general residential land capacity analysis may also be counted as land for the emergency housing LCA.⁶⁶

Recommended emergency housing capacity analysis steps

- 1) Selection 1 – Identify all parcels in zones that allow indoor emergency housing and indoor emergency shelters.
- 2) Selection 2 - From the parcels identified in Selection 1, narrow the search to vacant parcels, hotels and motels, significantly under-developed or under-utilized parcels, developed parcels with no active business licenses, and those sites that have been declared a nuisance.⁶⁷
 - Remove any properties from the selection that are sufficiently encumbered by environmentally critical areas to preclude additional development.
 - In some urban areas, under-used hotels and motels can be repurposed for emergency housing. If such sites exist in the community, the jurisdiction may, after consultation with the property owner, include these sites in the selection due to their potential for future conversion to emergency shelters or emergency housing.
 - A small portion of under-developed or under-utilized commercial spaces can be counted as capacity for redevelopment to emergency shelter or emergency housing. If a jurisdiction chooses to do this, the commercial area should be excluded from the employment capacity analysis performed for the

⁶⁴ Alternatively, Commerce recommends converting surplus emergency housing into permanent low-income housing when possible.

⁶⁵ The methodology for conducting an LCA for emergency housing is different from permanent housing for a number of reasons. First, in many communities, emergency housing needs are not addressed through new development. Instead, they are addressed through the acquisition and conversion of existing facilities, such as older motels or hotels or rehabilitation of underused or vacant buildings. In other cases, these emergency housing needs are met through the development of temporary shelter units in tiny home villages, which are built as a conditional use that does not conform to regular residential density standards.

⁶⁶ This is allowed to avoid double-counting housing needs that would be accommodated if the jurisdiction were successful at providing for all permanent housing needs.

⁶⁷ Jurisdictions use public nuisance declarations on sites to encourage redevelopment or rehabilitation of sites that endanger public health and safety. See [RCW 9.66.010: Public nuisance](#).

comprehensive plan update. If pursued, describe how the portion of commercial space conversion was determined considering such factors as the scale of emergency housing projects in your area and the likelihood a portion of the jurisdiction's emergency housing needs would develop in this way over the planning period.

3) Selection 3 – Amend Selection 2 based on the following:

- Add any parcels that have pending development permits for emergency shelter or emergency housing. Consider these parcels in the development pipeline and, once completed, count them towards a jurisdiction's local emergency housing need.
- Remove any parcels that have pending development permits for land uses other than emergency housing or shelters.

4) Selection 4 - Apply any adopted spacing or intensity requirements to the parcels from Selection 3 to identify the maximum number of potential sites where emergency housing would be allowed. This step should account for spacing around any existing emergency housing or shelters, as well as any hotel or motel sites identified for conversion to emergency housing. Depending on the required spacing and the number of sites identified in Selections 1-3, multiple configurations may be possible.

5) Complete one of the two following processes to determine how many emergency shelter beds or emergency housing units could be accommodated. Your approach should consider community and/or service provider demonstrated preference for emergency shelter or emergency housing facilities. Jurisdiction calculations may reflect this preference and the associated occupancy, intensity and/or capacity considerations.

- Option A (occupancy/intensity method): Using the sites identified in Selection 4, perform a simple site-level analysis of how many emergency shelter beds or emergency housing units could be accommodated based on any adopted occupancy and intensity requirements.
 - Identify developable area of the sites. Similar to the LCA for permanent housing, exclude non-buildable areas of the site (critical areas and their buffers, required landscaping and parking areas, setbacks, etc.) from developable area.
 - Identify a building envelope based on local regulations that maximizes available building capacity on the site.
 - Assume a portion of the envelope would be used for communal support spaces and remove that from the building envelope.
 - Assume construction will not exceed local trends in building height or make reasonable assumptions based upon the height limit in the zoning code.
 - Use the jurisdictions maximum occupancy rate as allowed by adopted codes to determine the maximum number of emergency beds or units possible in each building envelope.⁶⁸
- Option B (assumed density method): Use assumptions about what type of emergency housing and/or emergency shelters are likely to be developed in the jurisdiction and perform a capacity analysis of the sites identified in Selection 4 based on probable development typologies that may be used.
 - First, jurisdictions should develop density assumptions (units or beds per acre) that do not exceed adopted occupancy or intensity standards based on:

⁶⁸ Consult your local building official to confirm adopted occupancy by square foot standards.

- Allowed densities for hotels and motels in their local jurisdiction,
 - Densities achieved by existing emergency housing or shelters in the local region, and/or
 - A density or mix of emergency housing densities based on likely emergency housing or emergency shelter typologies in the jurisdiction, drawn from examples shown in Exhibit 20 or interviews with local developers of emergency housing.
- Based on a combination of emergency housing typologies and densities (see Exhibit 20 for some examples), or a single density assumption of the most likely emergency housing or emergency shelter typology for the community (e.g., converted hotel or motel, congregate shelter, etc.), determine the number of emergency beds or units possible on each site from Selection 4.
- 6) Add up the capacity from all available sites identified in Step 5. See Exhibit 21 for an example summary.
- 7) At the end of this calculation, document the capacity for emergency shelter and emergency housing in the jurisdiction compared to the allocated emergency housing need. If the capacity for emergency shelter and emergency housing does not meet or exceed that portion of the jurisdiction's allocated emergency housing need, regulations will need to be amended to allow sufficient capacity and steps 1-7 will need to be repeated with the new regulations to show capacity.

Note that sites assumed to be developed for emergency shelter and housing uses in the emergency housing land capacity analysis should be removed from sites available for commercial uses and employment growth in other capacity or planning work for the comprehensive plan. This change may also affect revenue projections, specifically from travel or other hospitality taxes if hotels are converted to shelters or other types of housing.

Exhibit 20. Example densities of emergency shelters and emergency housing

Project name	Location & context	Zoning	Housing type	Units/beds	Site size (acres)	Density	Facility characteristics
Emergency congregate⁶⁹ shelter							
Tri-City Union Gospel Mission	Pasco, urban	Light Industrial District	Emergency congregate shelter	162 beds	6.3 acres	25 beds/acre	New 1 story building, lots of parking, open space
Serenity House of Clallam County	Port Angeles, suburban	Residential Moderate Density (RMD)	Emergency congregate shelter	70 beds	1.89 acres	37 beds/acre	Clustered 2 story buildings, parking, open space
Benedict House	Bremerton, suburban	Residential-10	Emergency congregate shelter	24 beds, + 3 respite beds	0.21 acres	128 beds/acre	2-story single family home conversion
House of Charity	Spokane, urban	Downtown General	Emergency congregate shelter	108 beds	0.71 acres	152 beds/acre	2 stories, very small outdoor space, parking space for staff

⁶⁹ Congregate housing means more than one household per room.

Project name	Location & context	Zoning	Housing type	Units/beds	Site size (acres)	Density	Facility characteristics
Hope House	Spokane, urban	Downtown South	Emergency shelter on 1st floor, 3 floors PSH above	100 beds	0.45 acres	200 beds/acre	4 story multi-family style development, no parking or outdoor spaces
Emergency housing							
North King County Enhanced Shelter	Shoreline, suburban	Mixed Business	Nursing home conversion	60 beds,	2.66 acres (used area: 2.39 acres)	23 beds/acre (used area: 25 beds/acre)	1-story former nursing home, open space and parking
The Gateway in Honor of Tenaya Wright	Seattle, urban	Commercial 1-55	Hotel conversion	115 units; 135 beds	2.25 acres	51 units/acre or 60 beds/acre	3-story former hotel with parking
Quince Street Village	Olympia, urban	Downtown Business	Microhomes (8ft x 8ft)	100 units	1.41 acres	71 units/acre	Common showers, restrooms, laundry, providers offices
Permanent supportive housing at densities for consideration							
Orting Veterans Village	Orting, small town	Public Facilities	Tiny home village	35 units, each with bathroom (single room occupancy or SRO)	3.2 acres (portion with project)	11 units/acre plus community facilities	29 homes are 176 SF, 6 are 256 SF; community building, open space, parking
Quixote Village	Olympia, urban	Light Industrial	Tiny home village	30 units, each with ½ bath	2.17 acres	14 units/acre plus community facilities	All homes are 144 SF; 2,500 SF community building; open space, garden and parking

Example emergency housing capacity analysis

Exhibit 21 and Exhibit 22 illustrate an example of how a community may work to complete the LCA for emergency housing. In this example, the community has an allocated emergency housing need of 300 units.

After completing steps 1-4, the jurisdiction finds that an existing hotel might convert to emergency housing in the future and three sites totaling approximately 3 acres are zoned to allow emergency housing and shelters and meet the city's 1,000-foot spacing requirements. Using the assumed density approach (Option B), with a mix of densities for emergency housing likely to be built in the jurisdiction based on example densities in this report and neighboring jurisdictions, Exhibit 21 illustrates how this community finds it has a capacity deficit.

Exhibit 21. Example summary of emergency housing capacity

Site grouping	Acres	Density	Capacity (beds or units)	Total capacity	Total need	Capacity surplus or deficit
Existing hotel conversion			60	240	300	-60
Tiny shelter villages	3	60 units/acre	180			

Based on this deficit, the city reviews its spacing requirements, which had limited the number of available sites to three based on a 1,000-foot spacing requirement. The city evaluates a spacing requirement of 500 feet instead and recalculates the LCA for emergency housing as shown in Exhibit 22.

Exhibit 22. Example summary of revised emergency housing capacity

Site grouping	Acres	Density	Capacity (beds or units)	Total capacity	Total need	Adjusted capacity surplus or deficit
Existing hotel conversion			60	312	300	12
Tiny shelter villages	4.2	60 units/acre	252			

The changes to spacing allow the jurisdiction to have sufficient emergency housing capacity to meet the allocated need. The jurisdiction reduces the spacing requirements for emergency housing and emergency shelters in the community from 1,000 feet to 500 feet with the development regulation updates that accompany the comprehensive plan periodic update.



2024 Comprehensive Plan Periodic Update Land Capacity Analysis for Draft EIS

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Alternatives Analyzed

The following Draft Environmental Impact Statement (DEIS) alternatives were analyzed for the areas outside of the Winslow Town Center.

1. No Action
2. Dense Centers – “Go Up”
3. Distributed Density – “Go Out”

The alternatives are mapped in Appendices D and E. Key assumptions for the alternatives are documented in Appendix B and C.

Source Data

The following data was used for this land capacity analysis.

- Kitsap County tax parcel data from November 2023.
- City of Bainbridge Island critical area data from November 2023.
- Winslow Subarea Plan Update alternatives from April 19, 2024.
- Comprehensive Plan alternatives (outside Winslow) from May 2, 2024.

Methodology

The methodology for land capacity analysis (LCA) used by the City of Bainbridge Island (and all jurisdictions in Kitsap County) is documented in the 2021 Kitsap County Buildable Lands Report (BLR, Appendix F). Specifically:

- Appendix A of the BLR describes the base LCA methodology used by all jurisdictions.
- Appendix C of the BLR describes modifications to the LCA methodology used by the City of Bainbridge Island for the capacity calculations in the BLR.

The LCA methodology used to analyze these alternatives is substantially similar. Any modifications are described in this document.

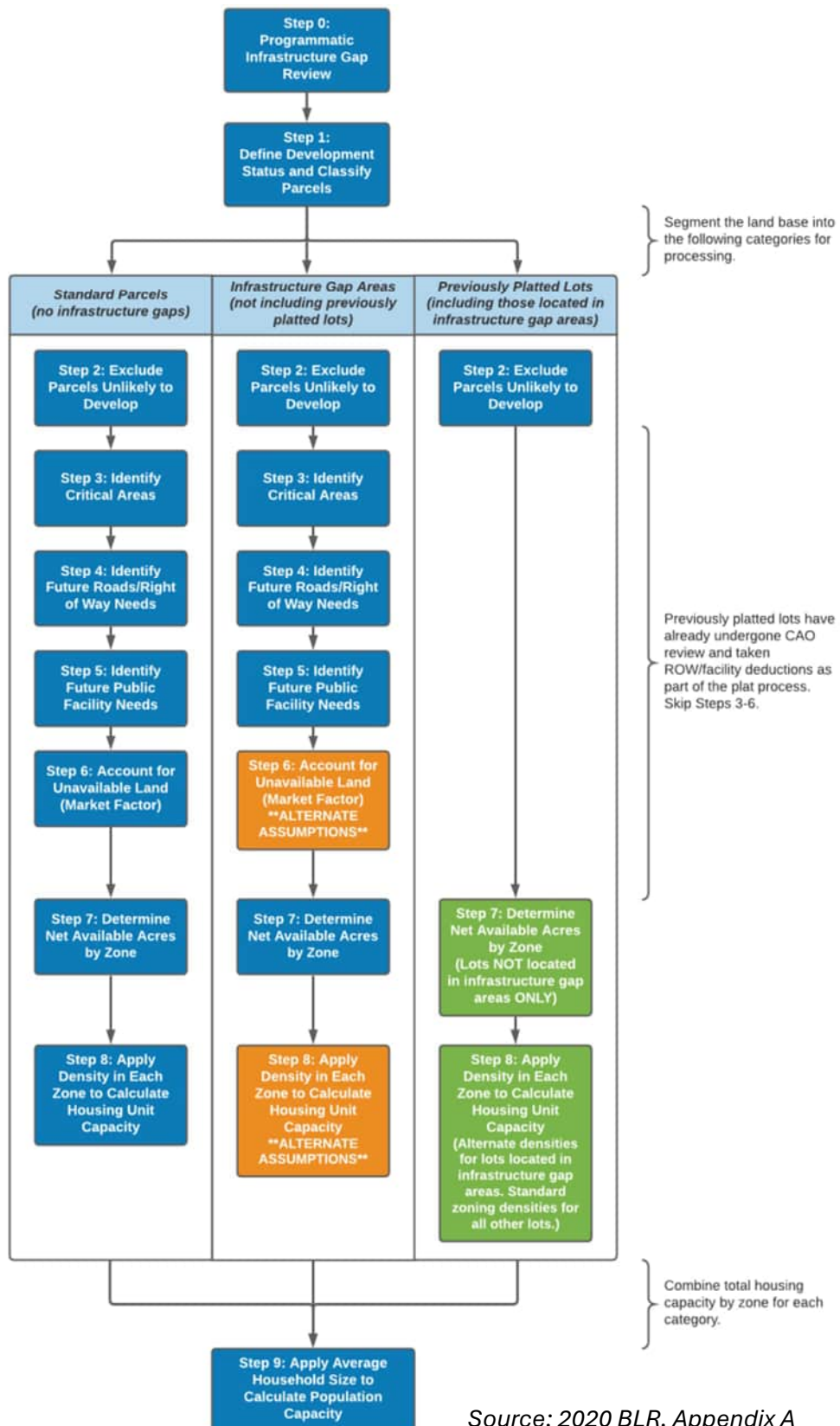
The following process diagrams summarize the 10-step LCA process.

Figure 1 – Kitsap County Residential LCA Process



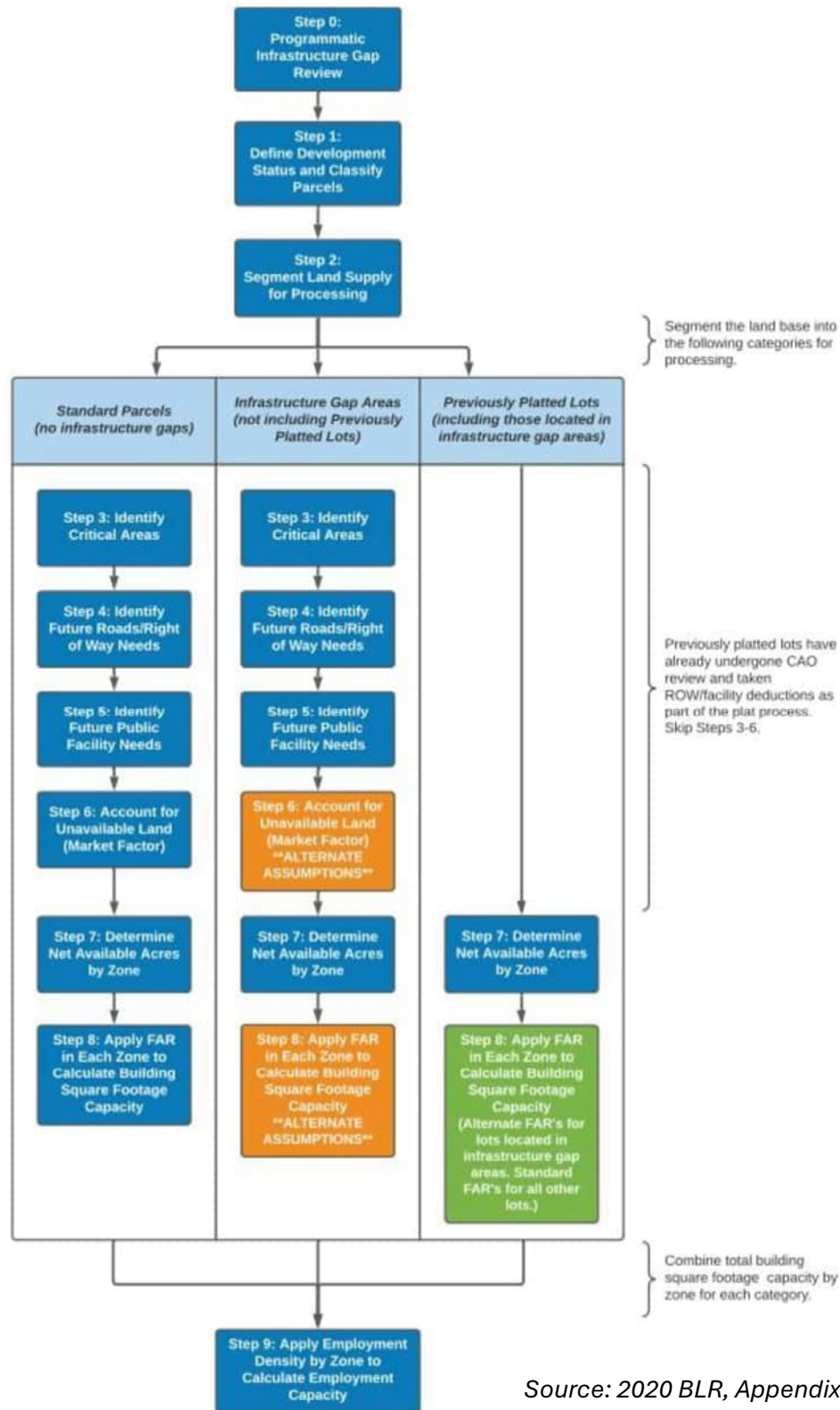
Source: 2020 BLR, Appendix A

Figure 2 – Kitsap County Residential Land Supply Data Processing Diagram



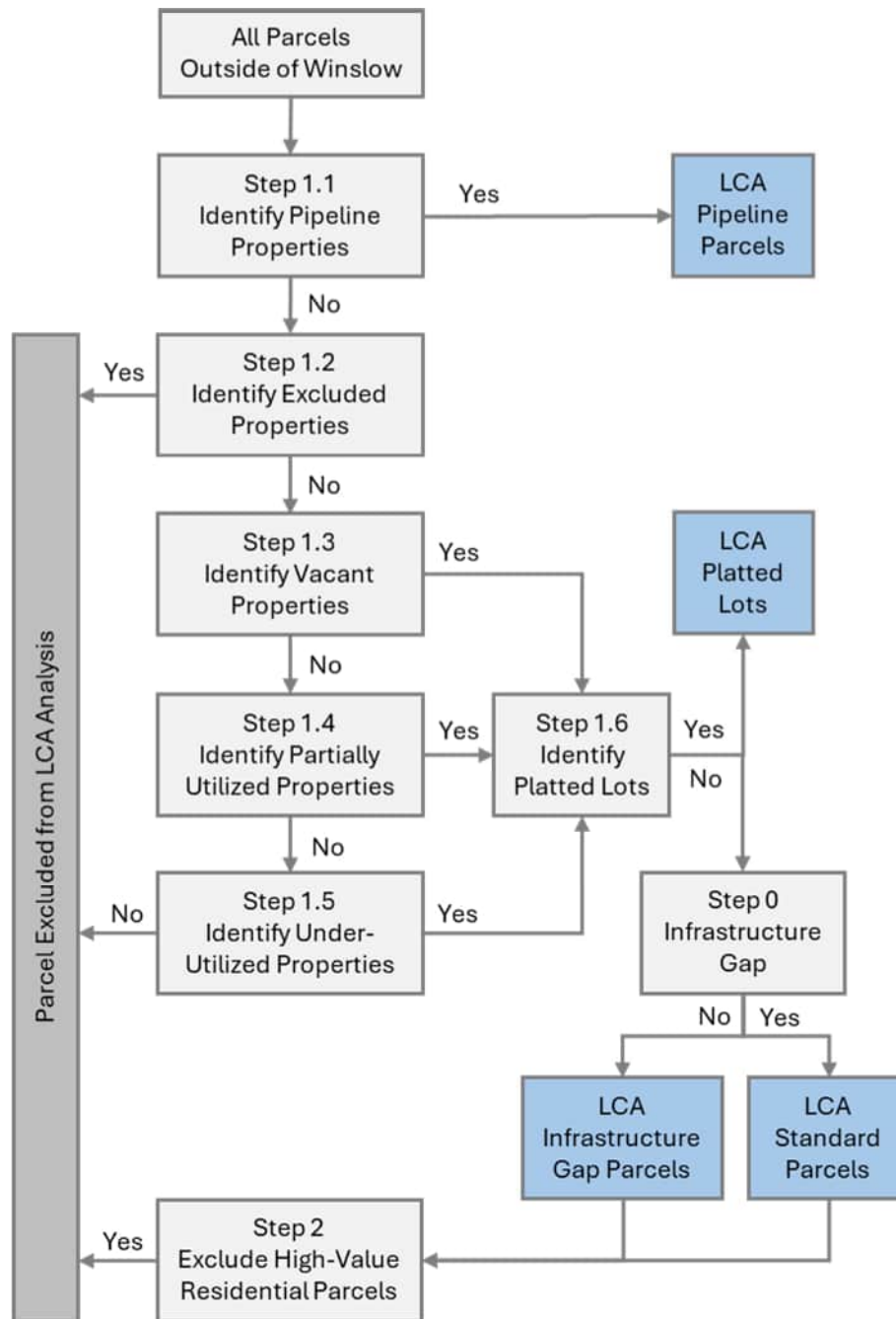
Source: 2020 BLR, Appendix A

Figure 3 – Kitsap County Commercial/Industrial Land Supply Data Processing Diagram



Source: 2020 BLR, Appendix A

Figure 4 – Summary Logic of Parcel Categorization in Steps 1 & 2



Pre-Processing of Parcel Data

1. Clip the parcel layer using the shoreline (approximate ordinary high water line) layer to ensure parcels include only upland land area.
2. Create/update the "Parcel_Acreage" and "Parcel_SQFT" fields in the parcel layer based on the geometry of the clipped parcels.
3. Review and correct the "Prop_Class" field as needed (see Tables 1 and 2). This is primarily focused on identifying parcels that should be in an excluded land use category for LCA Step 1. "Prop_Class" 999 is assigned to parcels that should be excluded from the LCA analysis but have an otherwise correct "Prop_Class" code that would not be otherwise excluded.
 - a. For example, land trust conservation easement properties are assigned "Prop_Class" 999.
4. Assign/update the Zoning field based on an overlay analysis of the parcels with the zoning layer applicable to the alternative.
 - a. Ignore minor misalignments of zoning boundaries and parcel boundaries as these are artifacts of mapping precision errors.
 - b. Identify "split-zoned" parcels (i.e. parcels with more than one zoning designation).
5. Prepare split-zoned parcels:
 - a. Divide the split-zoned parcels into sub-parcels based on zoning boundaries.
 - b. Create/update the "Parcel_Acreage" and "Parcel_SQFT" fields for each sub-parcel.
 - c. Remove any sub-parcel record that is less than 100sf as these are artifacts of mapping precision errors.
 - d. Assign the appropriate zone to the zoning field for each sub-parcel.
 - e. Edit the number of existing dwelling units located in each sub-parcel to ensure (1) any existing structures will be tallied in the correct zone and (2) there is no double counting.

Table 1 – "Prop_Class" Codes for LCA Analysis

Prop_Class Code & Description	Prop_Class Status for LCA Step 1	Reason Excluded	"Under-Utilized" Class when in a Mixed-Use Zone for LCA Step 1.5
111- Single family residence	Analyze		Yes
118- MH - Leased land	Analyze		Yes
119- MH - Real Property	Analyze		Yes
121- Duplex	Analyze		No
122- Triplex	Analyze		No
123- Four units	Analyze		No
131- 5-9 units	Analyze		No
134- 20-29 units	Analyze		No
141- Condo, residential	Analyze		No
160- Hotels and motels	Analyze		No
180- Other residential	Analyze		No
183- Sheds and garages	Analyze		Yes
198- Cabins	Analyze		Yes

459- Totally esmt encumbered	Excluded	Per BLR Appendix A	No
470- Communications	Excluded	Per BLR Appendix A	No
480- Utilities	Excluded	Per BLR Appendix A	No
483- Water systems	Excluded	Per BLR Appendix A	No
485- Sanitary land fills	Excluded	Per BLR Appendix A	No
Stormwater retention	Excluded	Per BLR Appendix A	No
489- State-assessed utilities	Excluded	Per BLR Appendix A	No
541- Conv store w/gas pumps	Analyze		No
580- Restaurants	Analyze		No
590- Other retail trade	Analyze		No
591- Neighborhood center	Analyze		No
624- Cemeteries	Excluded	Per BLR Appendix A	No
637- General warehouse	Analyze		No
638- Mini-warehouse	Analyze		No
640- Repair services	Analyze		No
656- Convalescent centers	Excluded	Per BLR Appendix A	No
670- Governmental services	Excluded	Per BLR Appendix A	No
680- Educational services	Excluded	Per BLR Appendix A	No
690- Misc. services	Analyze		No
691- Churches	Excluded	Per BLR Appendix A	No
710- Cultural activities	Excluded	Per BLR Appendix A	No
720- Public assembly	Excluded	COBI modified	No
740- Recreational	Excluded	COBI modified	No
744- Marina	Excluded	Per BLR Appendix A	No
760- Parks	Excluded	Per BLR Appendix A	No
810- Agricultural (not O.S.)	Analyze	Per BLR Appendix A	Yes
822- Veterinarian services	Analyze		No
830- CU Agriculture	Excluded	Per BLR Appendix A	No
880- Forest land	Analyze		Yes
910- Undeveloped land	Vacant	Per BLR Appendix A	No
911- Common area	Excluded	Per BLR Appendix A	No
939- Tidelands	Excluded	Per BLR Appendix A	No
940- CU Open Space	Excluded	Per BLR Appendix A	No
950- CU Timber	Excluded	Per BLR Appendix A	No
990 - Other Undeveloped Land	Vacant	Per BLR Appendix A	No
999 - Excluded for LCA by COBI	Excluded	COBI modified	No

Table 2 – Parcels Excluded from LCA Analysis based on Landowner

Landowner	Prop_Class Correction	Note/Exception
ARBOR FUND	710- Cultural activities	Bloedel Reserve
BAINBRIDGE ISLAND CITY OF	Varies	Current parcels are various excluded Prop_Class, EXCEPT Parcel 272502-3-028-2006 should remain Prop_Class 111
BAINBRIDGE ISLAND LAND TRUST	999 - Excluded for LCA by COBI	
BAINBRIDGE ISLAND METRO PARK & REC DIST	760- Parks	
BAINBRIDGE ISLAND METRO PARK & RECREATION DISTRICT	760- Parks	
BAINBRIDGE ISLAND METRO PARKS & REC DIST	760- Parks	
BAINBRIDGE ISLAND METROPOLITAN PARK & RECREATION DISTRICT	760- Parks	
BAINBRIDGE ISLAND METROPOLITAN PARKS & REC DIST	760- Parks	
BAINBRIDGE ISLAND METROPOLITAN PARKS AND	760- Parks	
BAINBRIDGE ISLAND METROPOLITAN PK & REC DIST	760- Parks	
BI METROPOLITAN PARK & REC DIST	760- Parks	
CITY OF BAINBRIDGE ISLAND	Varies	Current parcels are various excluded Prop_Class
DEPARTMENT OF TRANSPORTATION	999 - Excluded for LCA by COBI	
FIRE DIST 02 (BAINBRIDGE IS)	Varies	Current parcels are various excluded Prop_Class
ISLANDWOOD FNA PUGET SOUND ENVIROMENTAL	680- Educational services	
KITSAP COUNTY CONSOLIDATED HOUSING AUTHORITY	Varies	Current parcels are vacant and will be analyzed for housing, but need to review in future to ensure no other Prop_Class
KITSAP COUNTY PUBLIC WORKS	Varies	Current parcel is park, but need to review in future to ensure no other Prop_Class
KITSAP COUNTY SEWER DISTRICT 7	Varies	Current parcels are various excluded Prop_Class
KITSAP COUNTY TAX TITLE	999 - Excluded for LCA by COBI	
KITSAP COUNTY TIDELANDS	939- Tidelands	
PORT MADISON WATER CO	Varies	Current parcels are various excluded Prop_Class
PUBLIC UTILITY DIST NO 1 OF KITSAP COUNTY	483- Water systems	

SCHOOL DIST 303 BAINBRIDGE ISL	Varies	Current parcels are various excluded Prop_Class
SEWER DIST NO 7 SO BAINBR	Varies	Current parcels are various excluded Prop_Class
STATE AGENCY LANDS	Varies	Current parcels are various excluded Prop_Class
STATE OF WA DNR	Varies	Current parcels are excluded, but need to review in future to ensure no other Prop_Class
STATE OF WASHINGTON DOT	Varies	Current parcels are excluded, but need to review in future to ensure no other Prop_Class
BAINBRIDGE ISLAND SCHOOL 303	Varies	Current parcels are various excluded Prop_Class
HYLA MIDDLE SCHOOL	680- Educational services	
BAINBRIDGE DAY CARE/PRESCHOOL	680- Educational services	
MONTESSORI COUNTRY SCHOOL	680- Educational services	
ISLAND SCHOOL INC	680- Educational services	
WOODWARD MIDDLE SCHOOL	680- Educational services	
BLAKELY CAPTAIN J ELEMENTARY	680- Educational services	
WILKES CAPTAIN C ELEMENTARY	680- Educational services	
BAINBRIDGE ISLAND HS ADMIN & ORDWAY ELEM	680- Educational services	

RESIDENTIAL LAND CAPACITY ANALYSIS

Step 0 – Programmatic Infrastructure Gap Review

There are no infrastructure gaps for Alternative 1 as documented in the 2021 Buildable Lands Report. However, there will be residential sewer infrastructure gaps and alternative residential densities applicable in Rolling Bay and Island Center for Alternatives 2 & 3 (see Table 3).

Table 3 – Infrastructure Gap Areas and Alternative Densities

Infrastructure Gap	Infrastructure Gap Areas		Alt-2 Alternative Density		Alt-3 Alternative Density		
	Center	Zone	Residential FAR	Overall % Res	Residential Density	Residential FAR	Overall % Res
Residential Sewer	Rolling Bay	R-5	n/a	n/a	1 DU / 8,500 sqft lot (+ 1 ADU max)	n/a	100%
		NC	0.45	77.5%	n/a	0.43	80%
	Island Center	NC	0.45	77.5%	n/a	0.43	80%

Notes:

- See Residential Step 8.1 for footnotes explaining overall % residential in the NC zone.
- Sewer is not planned to be extended to the Rolling Bay, Island Center, or Day Road centers during the planning period.
- The sewer infrastructure gap applies to residential only because commercial septic (in mixed-use and B/I development) is assumed to fit on the remaining lot coverage per guidance from Kitsap Public Health District (KPHD).
- Industrial process waste cannot be discharged to septic systems per guidance from KPHD.

Step 1 - Define Development Status and Classify Parcels

Step 1.1: Identify Pipeline Properties (Optional)

Pipeline properties were identified as follows:

- Parcels with dwelling units built in years 2020 through 2023 using the “Year_Built” field. These were labelled as “built” pipeline properties because the baseline year for this LCA analysis is 2020.
- Approved plats where the subdivided lots have not yet been reflected in the parcel layer.

A comprehensive search of the City’s permit database identified no other residential pipeline properties.

Step 1.2: Identify Excluded Properties

Parcels were excluded using:

- The “Prop_Class” codes categorized as “excluded” for Step 1.2 in Table 1.
- Shoreline parcels less than 1 acre (per the assumptions outlined in BLR Appendix A)
- Parcels with land trust conservation easements
- Parcels in the R-6 zone (i.e. Point Monroe) which is assumed to be built-out due to undeveloped lots being used for septic systems or just being too small to practically develop a dwelling unit.

Step 1.3: Identify Vacant Properties

Used the assumptions outlined in BLR Appendix A.

Step 1.4: Identify Partially Utilized Properties

Used the assumptions outlined in BLR Appendix A.

Step 1.5: Identify Under-Utilized Properties

Used the assumptions outlined in BLR Appendix A.

Step 1.6: Identify Platted Lots

There are many lots on Bainbridge Island that were historically platted prior to modern subdivision requirements and critical area regulations. These historically platted lots are subject to subdivision requirements and critical area regulations when developed. Therefore, previously platted lots were categorized as “historic” or “modern” for this analysis.

Historic Platted Lots

Previously platted lots were categorized as “historic” and processed with “LCA Standard Parcels” if more than 25% of all parcels in the plat were developed prior to 1995 using the “Year_Built” field, which is prior to when most modern critical area regulations would have been in effect.

Modern Platted Lots

All other previously platted lots were categorized as “modern” and processed as “LCA Platted Lots” consistent with the assumptions in BLR Appendix A.

Step 1.7: Segment Land Base for Processing

Used the assumptions outlined in BLR Appendix A, except that:

- LCA Platted Lots include only “modern” platted lots from Step 1.6.

Step 2: Exclude Parcels Unlikely to Develop

Used the assumptions outlined in BLR Appendix A.

Step 3: Identify Critical Areas

Used the assumptions outlined in BLR Appendix C.

Deduction	25%	75%	90%
Streams & Buffers		X	
Wetlands & Buffers			X
Slopes 40% or more			X
Slopes 15-39%	X		
USGS Mapped Landslides	X		
Liquefaction Areas	X		
Fault Hazard Area (50' on either side of fault)	X		

Step 4: Identify Future Roads/Right of Way Needs

Used the assumptions outlined in BLR Appendix C.

Step 5: Identify Future Public Facility Needs

Used the assumptions outlined in BLR Appendix C.

Step 6: Account for Unavailable Lands (Market Factor)

Used the assumptions outlined in BLR Appendix C.

Step 7: Determine Available Net Acres

Used the assumptions outlined in BLR Appendix A.

Step 8: Apply Density in Each Zone to Calculate Housing Unit Capacity

Step 8.1. Calculate Gross Housing Unit Capacity

For “LCA Standard Parcels”, the residential density assumptions are provided in Table 4.

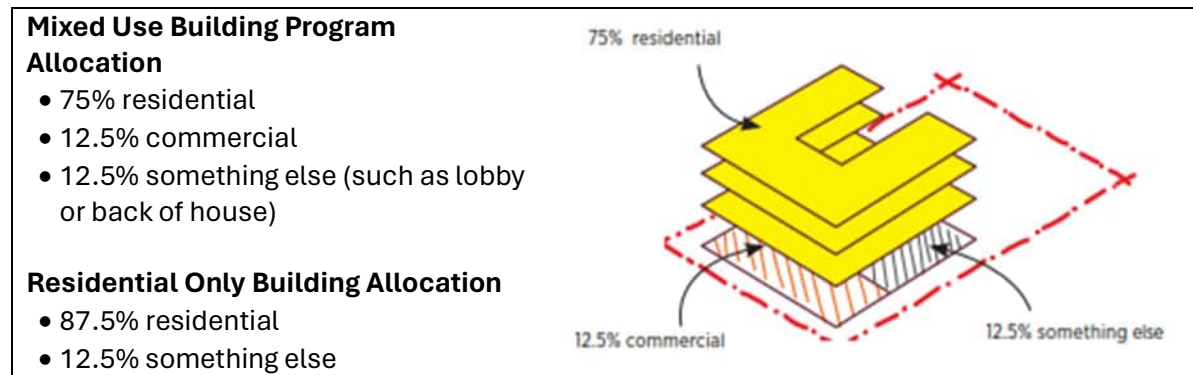
- For the NC zone (Alternative 1):
 - Used the assumptions outlined in BLR Appendix C.

- For the NC zone (Alternatives 2 & 3):
 - The percentage of total building floor area assumed to be residential (i.e. dwelling unit) floor area is calculated using the building program allocation in Figure 5.
 - The assumed average dwelling unit size is 850 sqft.
 - Formula: Housing unit capacity = ([Lot Area] * [FAR] * [Overall % Residential]) / 850 sqft

For “LCA Infrastructure Gap Parcels”, the alternative density assumptions are provided in Table 3.

For “LCA Platted Lots”, the residential density assumptions are outlined in BLR Appendix A.

Figure 5 - Building Program Allocation for the NC Zone



Source: Winslow 2044 Alternatives Capacity Frameworks

Table 4 – Residential Density Assumptions by Zone

Zone	Alternative 1			Alternative 2			Alternative 3		
	Min Lot Size per Unit (SQFT)	FAR	Overall % Res	Min Lot Size per Unit (SQFT)	FAR	Overall % Res	Min Lot Size per Unit (SQFT)	FAR	Overall % Res
R-0.4	100,000	n/a	100%	100,000	n/a	100%	100,000	n/a	100%
R-1	40,000	n/a	100%	40,000	n/a	100%	40,000	n/a	100%
R-2	20,000	n/a	100%	20,000	n/a	100%	20,000	n/a	100%
R-2.9	15,000	n/a	100%	15,000	n/a	100%	15,000	n/a	100%
R-3.5	12,500	n/a	100%	12,500	n/a	100%	12,500	n/a	100%
R-4.3	10,000	n/a	100%	10,000	n/a	100%	10,000	n/a	100%
R-5	8,500	n/a	100%	8,500	n/a	100%	8,500	n/a	100%
R-6	7,260	n/a	100%	7,260	n/a	100%	7,260	n/a	100%
NC/R-12	3,630	n/a	100%	n/a	n/a	n/a	n/a	n/a	n/a
NC	20,000	n/a	100%	n/a	1.50	77.5% ¹	n/a	1.20	80% ²

¹ Assumes:

- 20% of development is residential (NOT mixed-use), of which 87.5% is dwelling unit floor area (12.5% other).
- 80% of development is mixed-use, of which 75% is dwelling unit floor area.
- Formula: (20% * 87.5%) + (80% * 75%) = 77.5% of total floor area

² Assumes:

- 40% of development is residential (NOT mixed-use), of which 87.5% is dwelling unit floor area (12.5% other).
- 60% of development is mixed-use, of which 75% is dwelling unit floor area.
- Formula: (40% * 87.5%) + (60% * 75%) = 80% of total floor area

Step 8.2. Calculate Net Housing Unit Capacity

Used the assumptions outlined in BLR Appendix A.

Step 8.3. Address Pipeline Development

Used the assumptions outlined in BLR Appendix A.

Step 8.4. Address Capacity for Accessory Dwelling Units (ADU's) for Additional Urban Housing Capacity (Optional)

ADUs are not allowed or not applicable in the following zones for all Alternatives:

- R-6 (not allowed)
- NC (not applicable)
- NC/R-12 (not applicable)

For the R-5 Zone, the following assumptions were used:

- Alternative 1 used the assumptions outlined in BLR Appendix C.
- For Alternatives 2 & 3, 1 ADU (or compact apartment in MF buildings) per primary dwelling was assumed on all lots, including in infrastructure gap areas. This is because 1 ADU (or compact apartment in MF buildings) would be required while a second ADU (or compact apartment in MF buildings) would be allowed in the R-5 zone where there is no infrastructure gap (i.e. in Lynwood Center).

The assumptions outlined in BLR Appendix C were used for the following zones for all Alternatives:

- R-0.4 (3 ADUs/yr)
- R-2 (2.625 ADUs/yr)
- R-3.5 (0.75 ADU/yr)
- R-1 (1.75 ADUs/yr)
- R-2.9 (0.125 ADUs/yr)
- R-4.3 (1.125 ADU/yr)

Step 9: Apply Average Household Size to Calculate Population Capacity

Used the assumptions outlined in BLR Appendix A.

COMMERCIAL/INDUSTRIAL LAND CAPACITY ANALYSIS

Step 0 – Programmatic Infrastructure Gap Review

See discussion under Residential Step 0.

Step 1 - Define Development Status and Classify Parcels

Step 1.1: Identify Pipeline Properties (Optional)

Used the assumptions outlined in BLR Appendix A. A comprehensive search of the City's permit database identified no commercial/industrial pipeline projects outside of Winslow.

Step 1.2: Identify Excluded Properties

See discussion under Residential Step 1.2.

Step 1.3: Identify Vacant Properties

Used the assumptions outlined in BLR Appendix A.

Step 1.4: Identify Under-Utilized Properties

Used the assumptions outlined in BLR Appendix A.

Step 1.5: Identify Platted Lots

Step 3: Identify Critical Areas

Used the assumptions outlined in BLR Appendix C.

Deduction	25%	75%	90%
Streams & Buffers		X	
Wetlands & Buffers			X
Slopes 40% or more			X
Slopes 15-39%	X		
USGS Mapped Landslides	X		
Liquefaction Areas	X		
Fault Hazard Area (50' on either side of fault)	X		

Step 4: Identify Future Roads/Right of Way Needs

Used the assumptions outlined in BLR Appendix C.

Step 5: Identify Future Public Facility Needs

Used the assumptions outlined in BLR Appendix C.

Step 6: Account for Unavailable Lands (Market Factor)

Used the assumptions outlined in BLR Appendix C.

Step 7: Determine Available Net Acres

Used the assumptions outlined in BLR Appendix A.

Step 8: Apply Density in Each Zone to Calculate Building Square Footage Capacity

Step 8.1. Calculate Gross Commercial/Industrial Square Footage Capacity

Used the assumptions provided in Table 4.

Table 4 – Commercial/Industrial Building Area Assumptions by Zone

Zone	Primary Employment Type	Employment Density Assumed for Capacity Calculations	Alternative 1		Alternative 2		Alternative 3	
			FAR	Overall % Non-Res	FAR	Overall % Non-Res	FAR	Overall % Non-Res
NC/R-12	Commercial	1 employee / 400 sqft	1.05	50%	n/a	n/a	n/a	n/a
NC	Commercial	1 employee / 400 sqft	1.05	50%	1.50	10% ³	1.20	7.5% ⁴
B/I	Industrial	1 employee / 800 sqft	0.70	100%	1.50	100%	0.70	100%
WDI	Industrial	1 employee / 800 sqft	1.00	100%	1.00	100%	1.00	100%

³ Assumes:

- 80% of development is mixed-use, of which 12.5% is commercial floor area.
- Formula: $(80\% * 12.5\%) = 10\%$ of all floor area

⁴ Assumes:

- 60% of development is mixed-use, of which 12.5% is commercial floor area.
- Formula: $(60\% * 12.5\%) = 7.5\%$ of all floor area

Step 8.2. Calculate Net Commercial/Industrial Square Footage Capacity

Used the assumptions outlined in BLR Appendix A.

Step 8.3. Address Pipeline Development

Used the assumptions outlined in BLR Appendix A. A comprehensive search of the City's permit database identified no commercial/industrial pipeline projects outside of Winslow.

Step 9. Apply Employment Density by Zone to Determine Employment Capacity

Step 9.1 Classify each Zone as Either Commercial or Industrial

Used the assumptions outlined in BLR Appendix C. See Table 4.

Step 9.2 Select Employment Density Assumptions for Commercial and Industrial Zones

Used the assumptions outlined in BLR Appendix C. See Table 4.

Step 9.3 Divide Net Square Foot Capacity by Employment Density to Calculate Employment Capacity

Used the assumptions outlined in BLR Appendix A.

Home-Based Business Employment

The number of home-based businesses has increased significantly since the beginning of the COVID-19 pandemic and now represents a notable sector of employment in the community. For the first time, the City will reflect this non-traditional employment in the City's comprehensive planning process. The WA Department of Commerce encouraged the City to pursue this effort but had no specific methodology or guidance and no other jurisdiction was identified that could serve as a model for this effort. Therefore, the City's approach borrows heavily from methodologies used for demographic analysis and population allocation already used in comprehensive planning. For this inaugural effort, a conservative approach was taken for projecting growth. Appendix C summarizes assumptions, projection, and allocation of home-based business jobs for the 20-year planning period (2020-2044).

Appendix A

Island-wide Alternatives Land Area (acres)

Zoning Designation	Alt-1	Alt-2	Alt-3
Park	n/a	1,450.4	1,461.0
WDI	60.9	8.9	8.9
B/I	132.1	134.3	129.3
Core	87.4	115.0	99.2
Ferry	26.3	49.8	29.1
MAD	52.6	n/a	n/a
ERICK	30.9	n/a	n/a
GATE	41.1	n/a	n/a
Transition	n/a	138.4	126.0
HSR-1	46.0	n/a	n/a
HSR-2	12.9	n/a	n/a
HSR	n/a	147.6	92.7
NC	33.9	42.2	50.5
NC/R-12	4.9	n/a	n/a
R-14	22.2	n/a	37.8
R-8	114.5	162.5	365.9
R-6	10.2	10.2	10.2
R-5	15.5	16.2	93.2
R-4.3	191.8	131.1	299.8
R-3.5	196.4	166.4	129.5
R-2.9	488.7	407.2	359.0
R-2	3,173.2	3,099.3	2,912.6
R-1	3,177.4	3,153.3	3,120.6
R-0.4	9,473.9	8,164.5	8,072.7
CUR	1.5	n/a	n/a
Total Land Area	17,394	17,397	17,398

Land Use Designation	Alt-1	Alt-2	Alt-3
Industrial Centers	133.1	127.7	99.3
- Day Road	94.2	88.8	99.3
- Sportsman's Triangle	38.9	38.9	n/a
Neighborhood Centers	53.0	58.5	143.6
- Rolling Bay	10.5	10.5	52.3
- Island Center	9.1	13.3	17.4
- Lynwood Center	33.4	34.7	73.9
Winslow Town Center	1,355.7	1,355.7	1,208.8
Candidate Countywide Growth Center	n/a	452.1	356.5
Conservation Area	15,853	15,855	15,946

Total Land Area	17,394	17,397	17,398
- Centers	1,542	1,542	1,452
	8.9%	8.9%	8.3%
- Conservation Area	91.1%	91.1%	91.7%

Minor differences in total land area are due to rounding and limited mapping inconsistencies.

Comprehensive Plan Alternatives (Centers outside Winslow) Land Area (acres)

Day Road	Alt-1	Alt-2	Alt-3
B/I	94.2	88.8	99.3
Overall Center Size	94.2	88.8	99.3

Sportsman's Triangle	Alt-1	Alt-2	Alt-3
B/I	38.9	38.9	n/a
Overall Center Size	38.9	38.9	n/a

Rolling Bay	Alt-1	Alt-2	Alt-3
NC	10.5	10.5	14.6
R-5	n/a	n/a	37.7
Overall Center Size	10.5	10.5	52.3

Island Center	Alt-1	Alt-2	Alt-3
NC	9.1	13.3	17.4
R-5	n/a	n/a	n/a
Overall Center Size	9.1	13.3	17.4

Lynwood Center	Alt-1	Alt-2	Alt-3
NC/R-12	4.9	n/a	n/a
NC	13.0	18.4	18.5
R-5	15.5	16.3	55.4
Overall Center Size	33.4	34.7	73.9

Isolated NC Rezone	Alt-1	Alt-2	Alt-3
NC	1.5	n/a	n/a
B/I	n/a	1.2	1.2
R-2	n/a	0.3	0.3



Land Capacity Analysis by Land Use & Zoning Designation

Updated 5/8/2024

Updated 5/9/2024

Alternative 1 - Housing and Population Capacity

Updated 5/9/2024

	Designation	Existing DUs in Built-out & Excluded Parcels (pre-2020)	Vacant, Partially Utilized, & Under-Utilized Parcels Analyzed for Land Capacity (as of 2020)							Approx. DUs at Full Build-out	Approx. Population at Full Build-out
			Net Developable SqFt	Gross DU Capacity	Existing DUs (pre-2020)	Pipeline Parcel DUs	ADUs	Net DU Capacity	Population Capacity		
Land Use	Neighborhood Center	112	580,841	52	10	43	43	128	232	250	555
	Industrial Center	1								1	2
	Conservation Area	6,629	83,141,896	1,898	730	418	188	1,774	4,074	9,133	22,376
	Total	6,742	83,722,737	1,950	740	461	231	1,902	4,306	9,384	22,933
Zoning	NC/R-12	60	92,230	25	-	-	-	25	56	85	190
	NC	38	454,757	23	10	-	-	13	28	61	135
	R-6	56								56	137
	R-5	14	33,854	4	-	43	43	90	147	104	231
	R-4.3	84	71,015	7	7	-	23	23	23	114	278
	R-3.5	17	30,281	2	1	-	15	16	18	34	84
	R-2.9	37	79,611	5	5	-	3	3	3	45	110
	R-2	2,710	19,206,234	960	407	166	53	772	1,815	3,889	9,528
	R-1	1,906	19,056,116	476	161	101	35	451	1,055	2,518	6,170
	R-0.4	1,818	44,698,638	447	149	151	60	509	1,160	2,476	6,066
	WDI	1								1	2
	B/I	1								1	2
	Park										
	Total	6,742	83,722,737	1,950	740	461	231	1,902	4,306	9,384	22,933

Alternative 1 - Employment Capacity (Outside of Winslow)

Updated 5/9/2024

		Traditional Employment									Home-Based Business		
Designation	Existing Floor Area in Built-out & Excluded Parcels	Vacant, Partially Utilized, & Under-Utilized Parcels Analyzed for Land Capacity (as of 2020)							Approx. Floor Area at Full Build-out	Approx. Jobs at Full Build-out	Existing Jobs (2020)	Projected Job Growth (2020-2044)	Total Jobs (2044)
		Net Developable Land Area (SqFt)	Gross Floor Area Capacity	Existing Floor Area	Pipeline Parcel Floor Area	Net Floor Area Capacity	Job Capacity						
Land Use	Neighborhood Center	165,402	546,987	574,336	61,022	-	513,314	1,283	739,738	1,849	27	58	85
	Industrial Center	70,734	1,880,978	1,316,685	322,083	-	994,602	1,243	1,387,419	1,734	23	25	48
	Conservation Area	327,632	15,522	15,522	-	-	15,522	19	343,154	832	740	1,364	2,104
	Total	563,768	2,443,487	1,906,543	383,105	-	1,523,438	2,546	2,470,311	4,416	790	1,447	2,237
Zoning	NC/R-12	90,708	92,230	96,841	-	-	96,841	242	187,549	469			
	NC	74,694	454,757	477,495	61,022	-	416,473	1,041	552,189	1,380			
	WDI	4,886	15,522	15,522	-	-	15,522	19	20,408	26			
	B/I	70,734	1,880,978	1,316,685	322,083	-	994,602	1,243	1,387,419	1,734			
	Other	322,746							322,746	807			
	Total	563,768	2,443,487	1,906,543	383,105	-	1,523,438	2,546	2,470,311	4,416			

Alternative 2 - Housing and Population Capacity (Outside of Winslow)

5/3/2024

	Designation	Existing DUs in Built-out & Excluded Parcels (pre-2020)	Vacant, Partially Utilized, & Under-Utilized Parcels Analyzed for Land Capacity (as of 2020)							Approx. DUs at Full Build-out	Approx. Population at Full Build-out
			Net Developable SqFt	Gross DU Capacity	Existing DUs (pre-2020)	Pipeline Parcel DUs	ADUs	Net DU Capacity	Population Capacity		
Land Use	Neighborhood Center	112	603,120	370	19	63	63	477	981	608	1,349
	Industrial Center	5								5	12
	Conservation Area	7,020	75,869,435	1,703	614	557	188	1,835	4,223	9,469	23,198
	Total	7,137	76,472,555	2,073	633	620	251	2,311	5,204	10,081	24,559
Zoning	NC/R-12										
	NC	95	584,980	368	19	-	-	349	774	463	1,027
	R-6	73								73	179
	R-5	17	18,140	2	-	63	63	128	208	145	322
	R-4.3	90	9,950	1	1	-	23	23	23	114	278
	R-3.5	18	841	-	-	-	15	15	15	33	81
	R-2.9	41	17,249	1	2	-	3	3	3	46	111
	R-2	2,962	16,716,845	836	300	216	53	804	1,894	4,066	9,962
	R-1	1,956	18,289,271	457	156	139	35	475	1,113	2,587	6,338
	R-0.4	1,870	40,835,279	408	155	202	60	515	1,175	2,540	6,223
	WDI	2								2	5
	B/I	5								5	12
	Park	8								8	20
	Total	7,137	76,472,555	2,073	633	620	251	2,311	5,204	10,081	24,559

Alternative 2 - Employment Capacity (Outside of Winslow)

5/3/2024

		Traditional Employment									Home-Based Business		
Designation		Existing Floor Area in Built-out & Excluded Parcels	Vacant, Partially Utilized, & Under-Utilized Parcels Analyzed for Land Capacity (as of 2020)						Approx. Floor Area at Full Build-out	Approx. Jobs at Full Build-out	Existing Jobs (2020)	Projected Job Growth (2020-2044)	Total Jobs (2044)
			Net Developable Land Area (SqFt)	Gross Floor Area Capacity	Existing Floor Area	Pipeline Parcel Floor Area	Net Floor Area Capacity	Job Capacity					
Land Use	Neighborhood Center	99,825	147,742	22,161	26,513	-	-	-	126,338	316	27	77	104
	Industrial Center	307,970	901,025	1,351,537	104,680	-	1,246,857	1,559	1,659,507	2,074	23	25	48
	Conservation Area	4,406	-	-	-	-	-	-	4,406	6	740	1,210	1,950
	Total	412,201	1,048,767	1,373,699	131,193	-	1,246,857	1,559	1,790,251	2,396	790	1,312	2,102
Zoning	NC/R-12												
	NC	99,825	147,742	22,161	26,513	-	-	-	126,338	316			
	WDI	4,406	-	-	-	-	-	-	4,406	6			
	B/I	307,970	901,025	1,351,537	104,680	-	1,246,857	1,559	1,659,507	2,074			
	Other	381,628							381,628	954			
	Total	793,829	1,048,767	1,373,699	131,193	-	1,246,857	1,559	2,171,879	3,350			

Alternative 3 - Housing and Population Capacity (Outside of Winslow)

	Designation	Existing DUs in Built-out & Excluded Parcels (pre-2020)	Vacant, Partially Utilized, & Under-Utilized Parcels Analyzed for Land Capacity (as of 2020)							Approx. DUs at Full Build-out	Approx. Population at Full Build-out
			Net Developable SqFt	Gross DU Capacity	Existing DUs (pre-2020)	Pipeline DUs	ADUs	Net DU Capacity	Population Capacity		
Land Use	Neighborhood Center	142	1,960,447	568	54	65	65	644	1,351	840	1,865
	Industrial Center	5								5	12
	Conservation Area	7,198	75,933,718	1,724	604	567	173	1,859	4,305	9,661	23,670
	Total	7,345	77,894,165	2,292	658	632	238	2,504	5,656	10,507	25,548
Zoning	NC/R-12										
	NC	95	800,759	432	23	-	-	409	908	527	1,170
	R-6	72								72	176
	R-5	47	1,159,688	136	31	65	65	235	443	313	696
	R-4.3	90	9,950	1	1	-	23	23	23	114	278
	R-3.5	4	-	-	-	-	-	-	-	4	10
	R-2.9	397	177,611	12	5	19	3	28	65	430	1,054
	R-2	2,910	17,101,943	855	302	216	53	822	1,937	4,034	9,882
	R-1	1,926	17,984,845	450	147	132	35	470	1,100	2,543	6,229
	R-0.4	1,861	40,659,368	407	149	200	60	518	1,181	2,528	6,192
	WDI	2								2	5
	B/I	5								5	12
	Park	8								8	20
	Total	7,417	77,894,165	2,292	658	632	238	2,504	5,656	10,579	25,724

Alternative 3 - Employment Capacity (Outside of Winslow)

5/3/2024

		Traditional Employment									Home-Based Business		
Designation	Existing Floor Area in Built-out & Excluded Parcels	Vacant, Partially Utilized, & Under-Utilized Parcels Analyzed for Land Capacity (as of 2020)							Approx. Floor Area at Full Build-out	Approx. Jobs at Full Build-out	Existing Jobs (2020)	Projected Job Growth (2020-2044)	Total Jobs (2044)
		Net Developable Land Area (SqFt)	Gross Floor Area Capacity	Existing Floor Area	Pipeline Parcel Floor Area	Net Floor Area Capacity	Job Capacity						
Land Use	Neighborhood Center	99,825	147,643	13,288	26,513	-	-	-	126,338	316	27	121	148
	Industrial Center	234,834	606,912	424,839	3,316	-	421,523	527	659,673	825	23	25	48
	Conservation Area	292,861	-	-	-	-	-	-	292,861	727	740	1,208	1,948
	Total	627,520	754,555	438,127	29,829	-	421,523	527	1,078,872	1,867	790	1,354	2,144
Zoning	NC/R-12												
	NC	99,825	147,643	13,288	26,513	-	-	-	126,338	316			
	WDI	4,406	-	-	-	-	-	-	4,406	6			
	B/I	234,834	606,912	424,839	3,316	-	421,523	527	659,673	825			
	Other	288,455							288,455	721			
	Total	627,520	754,555	438,127	29,829	-	421,523	527	1,078,872	1,867			

Appendix B

2024 Comprehensive Plan Periodic Update

Key Assumptions for Centers Outside Winslow

Key Changes to Zoning Standards*	“Go Up” Alternative 2 (Dense Centers)			“Go Out” Alternative 3 (Distributed Density)		
	R-5	NC	B/I	R-5	NC	B/I
Change to required (from max.) floor area ratio (FAR) and dwelling units per square feet (DU/sf) of lot area	1 DU/8,500sf (no change)	1.5 FAR 20% residential 80% mixed-use (from 1 DU/20,000sf + commercial)	Limited by other standards (no change)	1 DU/8,500sf (no change)	1.2 FAR 40% residential 60% mixed-use (from 1 DU/20,000sf + commercial)	Limited by other standards (no change)
Maximum Lot Coverage	35% (from 25%)	50% (from 25%)	50% (from 35%)	35% (from 25%)	50% (from 25%)	35% (no change)
Maximum base building height	45’ (from 25’)	45’ (from 35’)	45’ (from 35’)	35’ (from 25’)	45’ (from 35’)	35’ (no change)
Encourage mix of smaller dwelling unit sizes (average DU size shown)	1,200sf	850sf	(no change)	1,200sf	850sf	(no change)
Encourage internal conversion of existing buildings to multi-family with 50% bonus density (consistent with HB-1042 mandate)	✓	✓	N/A	✓	✓	N/A
ADUs up to 1,000sf consistent with HB-1337 (from 900sf)	2 (from 1)	N/A with FAR	N/A	2 (from 1)	N/A with FAR	N/A

* These changes do not apply within Shoreline Jurisdiction.

Other Key Assumptions

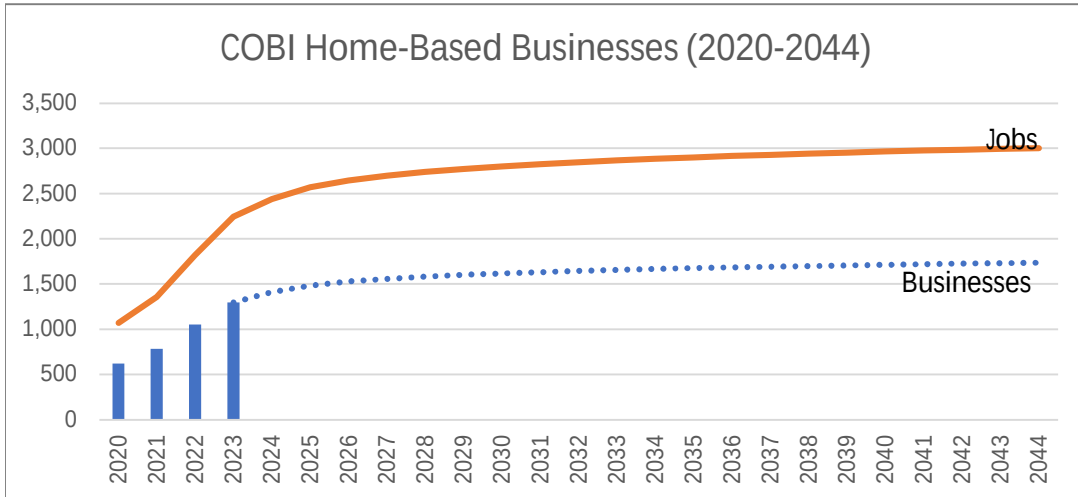
- Sewer service will not be extended to the Rolling Bay, Island Center, and Day Road centers during this planning period.
- Walkable neighborhood areas are generally substantially unencumbered land within approximately ¼ mile (5-minute walk).

Appendix C



2024 Comprehensive Plan Periodic Update & Winslow Subarea Plan Update

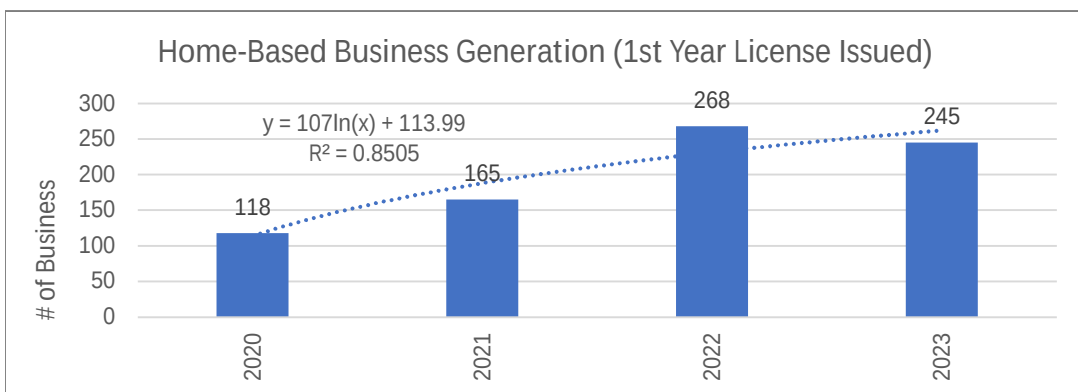
Home-Based Business (HBB) Growth Projection



Due to limited historic data and uncertainties related to home-based business trends during and after the COVID-19 pandemic, a logarithmic trend (declining growth over time) is assumed for conservative forecasting.

Home-Based Businesses (2020-2044)

Year	Businesses	Jobs	Jobs/Business
2020 (Estimate)	619	1,070	1.7 (assumed)
2023 (Actual)	1,297	2,243	1.7
2044 (Forecast)	1,737	3,003	1.7 (assumed)
2020-2044 Growth	1,118	1,933	1.7 (assumed)



2024 Comprehensive Plan Periodic Update & Winslow Subarea Plan Update

Home-Based Business (HBB) Employment Characterization

5/3/2024

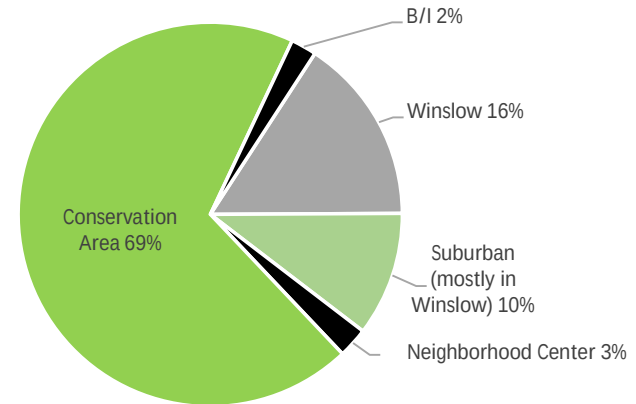
HBB Employment by Location (2023)

Zone	Subarea	Businesses	% Bus	Jobs	% Jobs	Jobs/HBB
CORE	Winslow	138	11%	353	16%	2.6
MAD						
ERICK						
FTD						
GATE						
HS-1						
R-14						
R-8						
R-4.3	Suburban (mostly in Winslow)	145	11%	235	10%	1.6
R-3.5						
R-2.9						
NC	Neighborhood Center	13	1%	57	3%	4.4
NC-R-12						
R-5						
R-6	Conservation Area	992	77%	1,550	69%	1.6
R-2						
R-1						
R-0.4						
B/I	B/I	9	1%	48	2%	5.3
Total		1,288	100%	2,243	100%	1.7

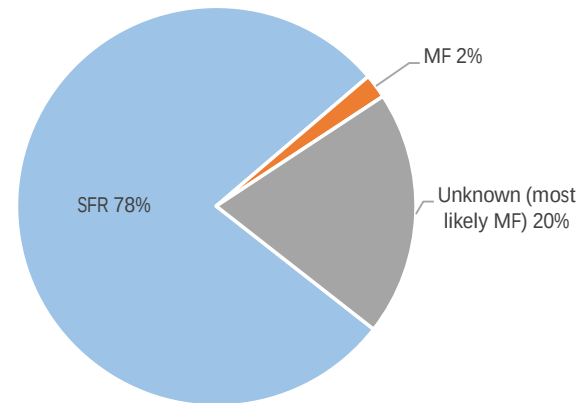
HBB Employment by Housing Type (2023)

Housing Type	Businesses	% Bus	Jobs	% Jobs	Jobs/HBB
Single-family (SFR)	1,119	86%	1,754	78%	1.6
Multi-family (MF)	16	1%	44	2%	2.8
Unknown (most likely MF)	162	12%	445	20%	2.7
Total	1,297	100%	2,243	100%	1.7

HBB Jobs by Location (2023)



HBB Jobs by Housing Type (2023)



2024 Comprehensive Plan Periodic Update & Winslow Subarea Plan Update

Home-Based Business (HBB) Employment Growth Allocation

Alt-1	Planned Housing Capacity 2020-2044		2020 HBB Distribution (Est)		2023 HBB Distribution (Actual)				2024-2044 HBB Growth (Projection)		2024-2044 HBB Growth (Allocation)				2020-2024 HBB Job Growth		
	Units	% Total	Business	Jobs	Business	% Bus	Jobs	% Jobs	Business	Jobs	Business	% Bus	Jobs	% Jobs	Business	Jobs	% Jobs
Winslow Town Center	592	19.8%	135	281	283	21.8%	588	26.2%	440	760	92	20.9%	178	23.4%	240	485	25.1%
Neighborhood Centers	127	4.3%	6	27	13	1.0%	57	2.5%			12	2.7%	29	3.8%	19	58	3.0%
Industrial Centers	0	0.0%	4	23	9	0.7%	48	2.1%							5	25	1.3%
Conservation Area	2,266	75.9%	473	740	992	76.5%	1,550	69.1%			336	76.3%	554	72.9%	854	1,364	70.6%
Total	2,985	100%	619	1,070	1,297	100%	2,243	100%			440	100%	760	100%	1,118	1,933	100%

Alt-2	Planned Housing Capacity 2020-2044		2020 HBB Distribution (Est)		2023 HBB Distribution (Actual)				2024-2044 HBB Growth Projection		2024-2044 HBB Growth (Allocation)				2020-2024 HBB Job Growth		
	Units	% Total	Business	Jobs	Business	% Bus	Jobs	% Jobs	Business	Jobs	Business	% Bus	Jobs	% Jobs	Business	Jobs	% Jobs
Winslow Town Center	2,868	55.4%	135	281	283	21.8%	588	26.2%	440	760	170	38.7%	313	41.1%	318	620	32.1%
Neighborhood Centers	477	9.2%	6	27	13	1.0%	57	2.5%			23	5.2%	47	6.2%	30	77	4.0%
Industrial Centers	0	0.0%	4	23	9	0.7%	48	2.1%							5	25	1.3%
Conservation Area	1,835	35.4%	473	740	992	76.5%	1,550	69.1%			247	56.1%	400	52.6%	765	1,210	62.6%
Total	5,180	100%	619	1,070	1,297	100%	2,243	100%			440	100%	760	100%	1,118	1,933	100%

Alt-3	Planned Housing Capacity 2020-2044		2020 HBB Distribution (Est)		2023 HBB Distribution (Actual)				2024-2044 HBB Growth Projection		2024-2044 HBB Growth (Allocation)				2020-2024 HBB Job Growth		
	Units	% Total	Business	Jobs	Business	% Bus	Jobs	% Jobs	Business	Jobs	Business	% Bus	Jobs	% Jobs	Business	Jobs	% Jobs
Winslow Town Center	2,388	44.5%	135	281	283	21.8%	588	26.2%	440	760	146	33.3%	272	35.7%	294	579	30.0%
Neighborhood Centers	1,114	20.8%	6	27	13	1.0%	57	2.5%			48	11.0%	91	12.0%	55	121	6.3%
Industrial Centers	0	0.0%	4	23	9	0.7%	48	2.1%							5	25	1.3%
Conservation Area	1,859	34.7%	473	740	992	76.5%	1,550	69.1%			245	55.7%	397	52.2%	763	1,208	62.5%
Total	5,361	100%	619	1,070	1,297	100%	2,243	100%			440	100%	760	100%	1,118	1,933	100%

Assumptions:

1. The location of housing growth will influence where HBB growth will occur.
2. No additional HBB growth is anticipated in the Industrial Centers.

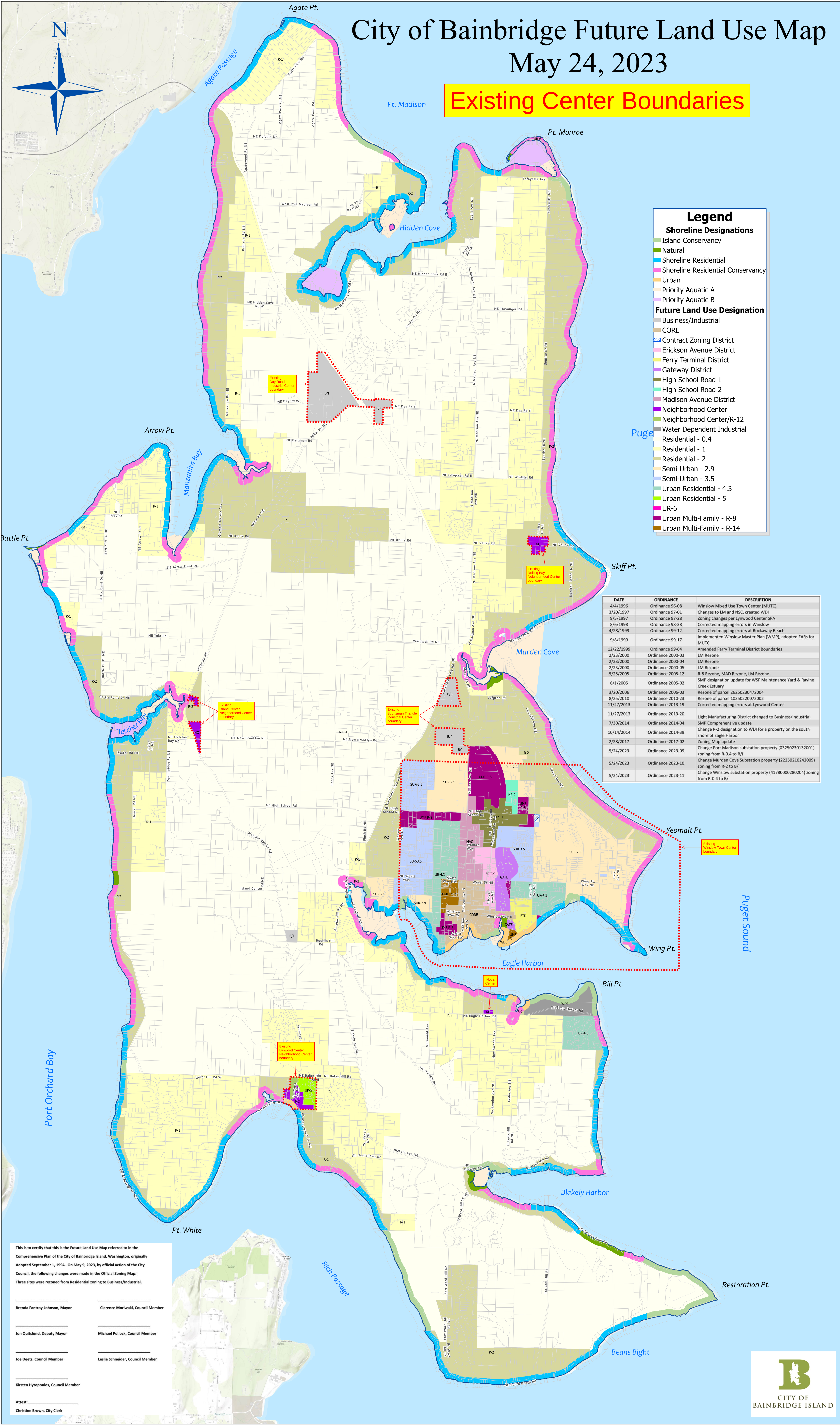
5/3/2024

Appendix D

City of Bainbridge Future Land Use Map

May 24, 2023

Existing Center Boundaries



Legend

Shoreline Designations

Island Conservancy

Natural

Shoreline Residential

Shoreline Residential Conservancy

Urban

Priority Aquatic A

Priority Aquatic B

Future Land Use Designation

Business/Industrial

CORE

Contract Zoning District

Erickson Avenue District

Ferry Terminal District

Gateway District

High School Road 1

High School Road 2

Madison Avenue District

Neighborhood Center

Neighborhood Center/R-12

Water Dependent Industrial

Residential - 0.4

Residential - 1

Residential - 2

Semi-Urban - 2.9

Semi-Urban - 3.5

Urban Residential - 4.3

Urban Residential - 5

UR-6

Urban Multi-Family - R-8

Urban Multi-Family - R-14

DATE	ORDINANCE	DESCRIPTION
4/4/1996	Ordinance 96-08	Winslow Mixed Use Town Center (MUTC)
3/20/1997	Ordinance 97-01	Changes to LM and NSC, created WDI
9/5/1997	Ordinance 97-28	Zoning changes per Lynwood Center SPA
8/6/1998	Ordinance 98-38	Corrected mapping errors in Winslow
4/28/1999	Ordinance 99-12	Corrected mapping errors at Rockaway Beach
9/8/1999	Ordinance 99-17	Implemented Winslow Master Plan (WMP), adopted FARs for MUTC
12/23/1999	Ordinance 99-64	Amended Ferry Terminal District Boundaries
2/23/2000	Ordinance 2000-03	LM Rezone
2/23/2000	Ordinance 2000-04	LM Rezone
2/23/2000	Ordinance 2000-05	LM Rezone
5/25/2005	Ordinance 2005-12	R-8 Rezone, MAD Rezone, LM Rezone
6/1/2005	Ordinance 2005-02	SMP designation update for WSF Maintenance Yard & Ravine Creek Estuary
3/20/2006	Ordinance 2006-03	Rezone of parcel 26250230472004
8/25/2010	Ordinance 2010-23	Rezone of parcel 10250230072002
11/27/2013	Ordinance 2013-19	Corrected mapping errors at Lynwood Center
11/27/2013	Ordinance 2013-20	Light Manufacturing District changed to Business/Industrial
7/30/2014	Ordinance 2014-04	SMP Comprehensive update
10/14/2014	Ordinance 2014-39	Change R-2 designation to WDI for a property on the south shore of Eagle Harbor
2/28/2017	Ordinance 2017-02	Zoning Map update
5/24/2023	Ordinance 2023-09	Change Port Madison substation property (03250230132001) zoning from R-0.4 to B/I
5/24/2023	Ordinance 2023-10	Change Murden Cove Substation property (22250210242009) zoning from R-2 to B/I
5/24/2023	Ordinance 2023-11	Change Winslow substation property (41780000280204) zoning from R-0.4 to B/I

This is to certify that this is the Future Land Use Map referred to in the Comprehensive Plan of the City of Bainbridge Island, Washington, originally Adopted September 1, 1994. On May 9, 2023, by official action of the City Council, the following changes were made in the Official Zoning Map:

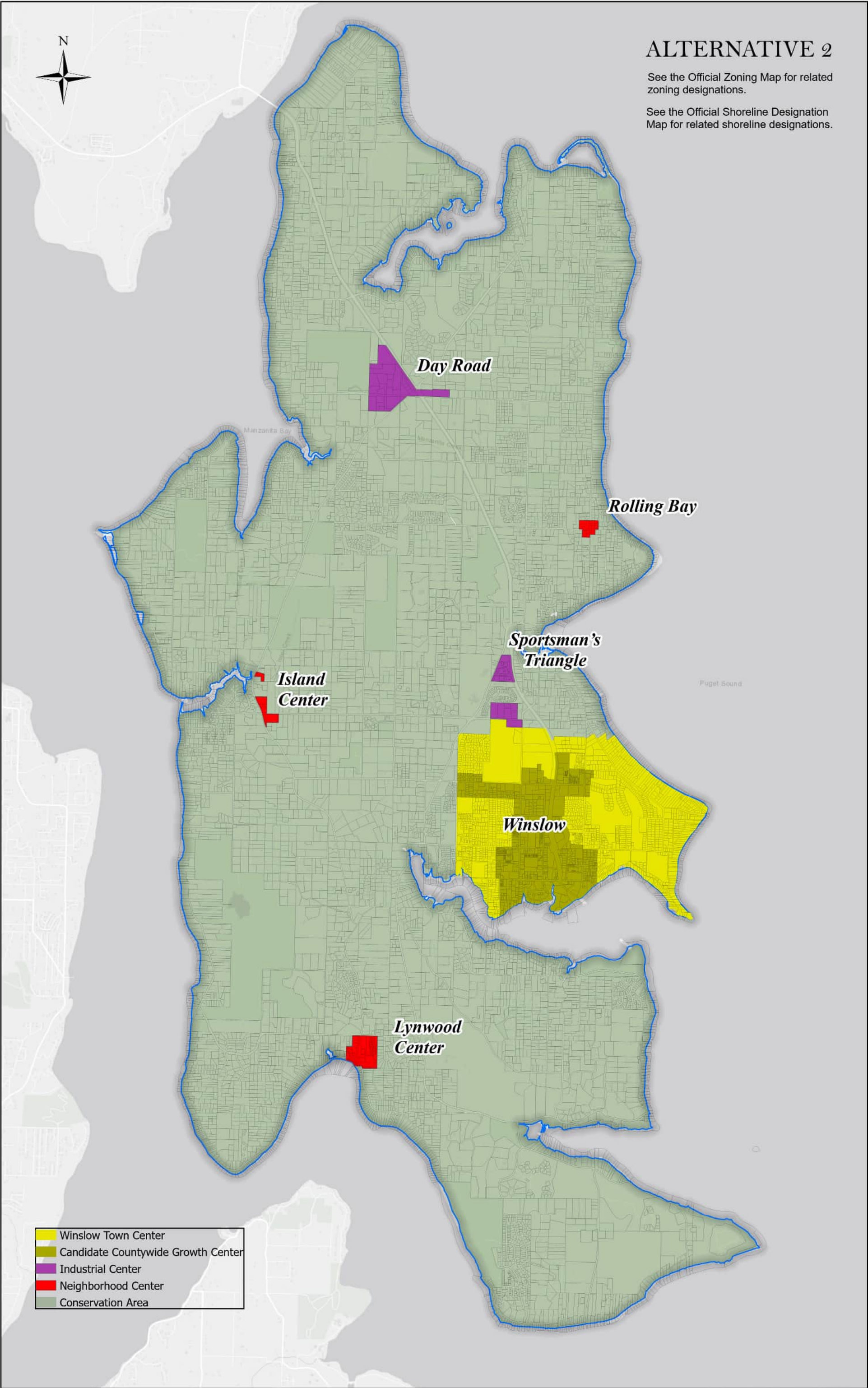
Three sites were rezoned from Residential zoning to Business/Industrial.

Brenda Fantry-Johnson, Mayor	Clarence Moriwaiki, Council Member
Jon Quitslund, Deputy Mayor	Michael Pollock, Council Member
Joe Deets, Council Member	Leslie Schneider, Council Member
Kirsten Hytopoulos, Council Member	

Attest:

Christine Brown, City Clerk



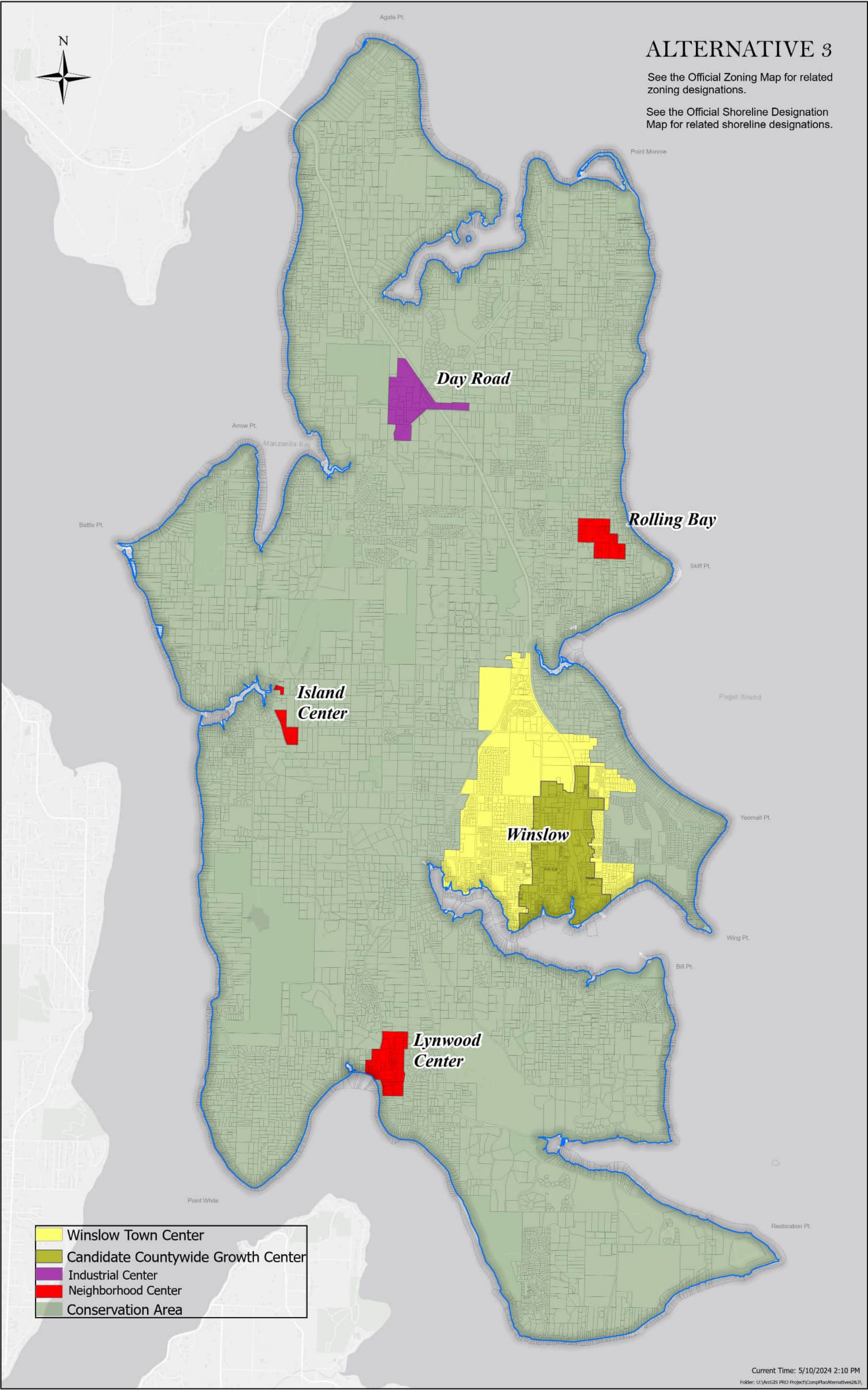


ALTERNATIVE 2

See the Official Zoning Map for related zoning designations.

See the Official Shoreline Designation Map for related shoreline designations.

- Winslow Town Center
- Candidate Countywide Growth Center
- Industrial Center
- Neighborhood Center
- Conservation Area



Appendix E

City of Bainbridge Island Official Zoning Map

May 24, 2023



Legend

Shoreline Designations

- Island Conservancy
- Natural
- Shoreline Residential
- Shoreline Residential Conservancy
- Urban
- Priority Aquatic A
- Priority Aquatic B

Zoning Designations

- Business/Industrial
- CORE
- Ericksen Avenue District
- Ferry Terminal District
- Gateway District
- High School Road 1
- High School Road 2
- Limited to Current Use
- Madison Avenue District
- Neighborhood Center
- Neighborhood Center/R-12
- Water Dependent Industrial

R-0.4 1 Unit per 2.5 Acres Zone (100,000 Sq.Ft.)

R-1 1 Unit per Acre Zone (40,000 Sq.Ft.)

R-2 2 Units per Acre Zone (20,000 Sq.Ft.)

R-2.9 2.9 Units per Acre Zone (15,000 Sq.Ft.)

R-3.5 3.5 Units per Acre Zone (12,500 Sq.Ft.)

R-4.3 4.3 Units per Acre Zone (10,000 Sq.Ft.)

R-5 5 Units per Acre Zone (8,500 Sq.Ft.)

R-6 6 Units per Acre Zone (7,260 Sq.Ft.)

R-8 8 Units per Acre Zone (5,400 Sq.Ft.)

R-14 14 Units per Acre Zone (3,100 Sq.Ft.)

Mixed Use Town Center						
	Central Core	Madison Avenue	Ericksen Avenue	Gateway District	Ferry Terminal District	High School Rd District 1 & 2
Floor Area Ratio (FAR)	0.6	0.4	0.3	0.15	0.1	0.3
Commercial	0.4	0.4	0.3	0.5	0.4	0.3
Residential	1	0.5	0.5	0.5	0.5	0.3
Mixed Use	1	0.5	0.5	0.5	0.5	0.3
Maximum FAR with Bonus	1	0.6	0.6	0.3	0.2	0.6
Commercial	1	0.6	0.6	1	1.1	0.6
Residential	1.5	1	1	1	1.3 (1.5)	1
Mixed Use	1.5	1	1	1	1.3 (1.5)	1

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Jon Quitslund, Deputy Mayor

Joe Deets, Council Member

Kirsten Hytopoulos, Council Member

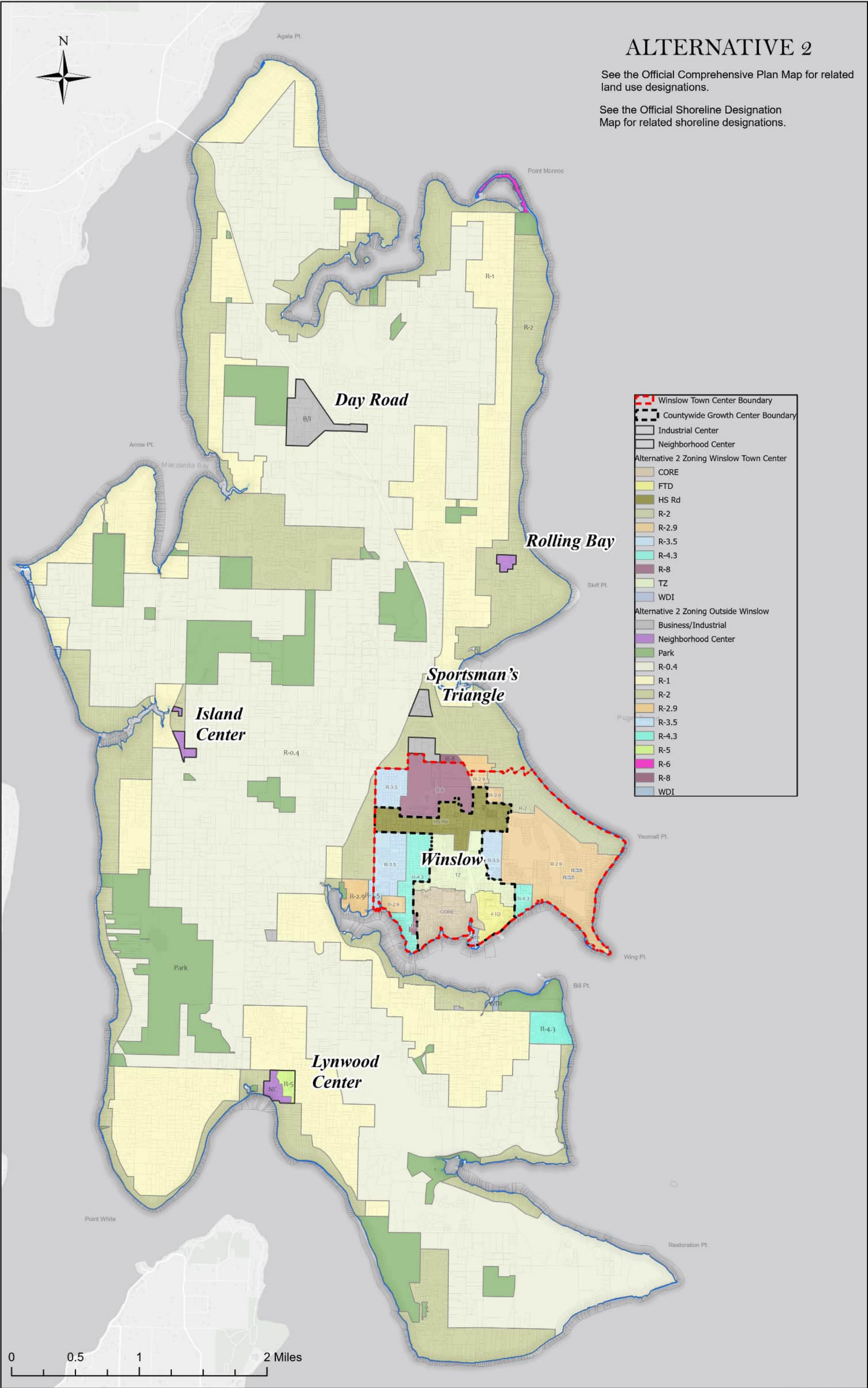
Clarence Moriwaki, Council Member

Michael Pollock, Council Member

Leslie Schneider, Council Member

Attest:
Christine Brown, City Clerk



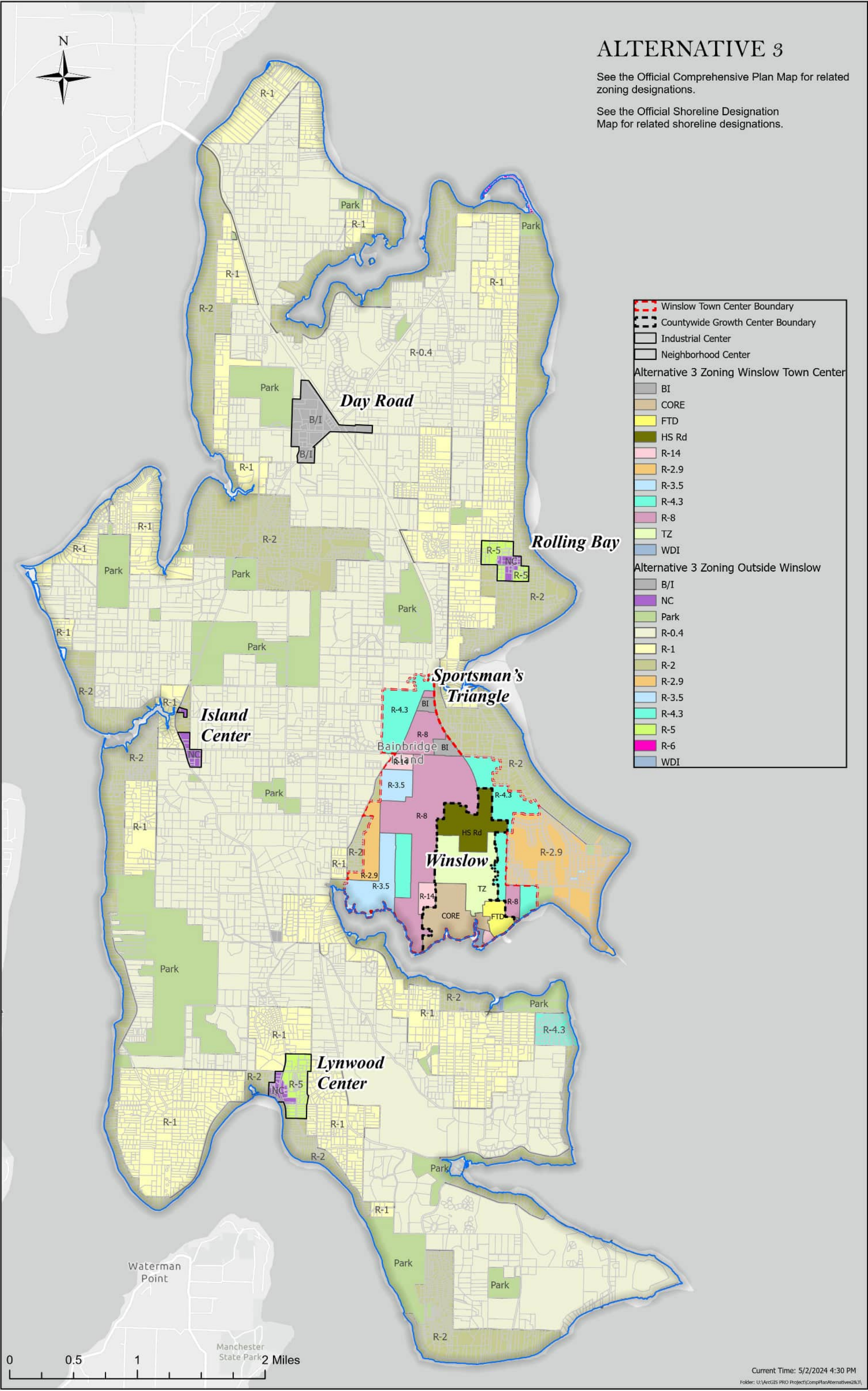


ALTERNATIVE 2

See the Official Comprehensive Plan Map for related land use designations.

See the Official Shoreline Designation Map for related shoreline designations.

- Winslow Town Center Boundary
- Countywide Growth Center Boundary
- Industrial Center
- Neighborhood Center
- Alternative 2 Zoning Winslow Town Center
 - CORE
 - FTD
 - HS Rd
 - R-2
 - R-2.9
 - R-3.5
 - R-4.3
 - R-8
 - TZ
 - WDI
- Alternative 2 Zoning Outside Winslow
 - Business/Industrial
 - Neighborhood Center
 - Park
 - R-0.4
 - R-1
 - R-2
 - R-2.9
 - R-3.5
 - R-4.3
 - R-5
 - R-6
 - R-8
 - WDI

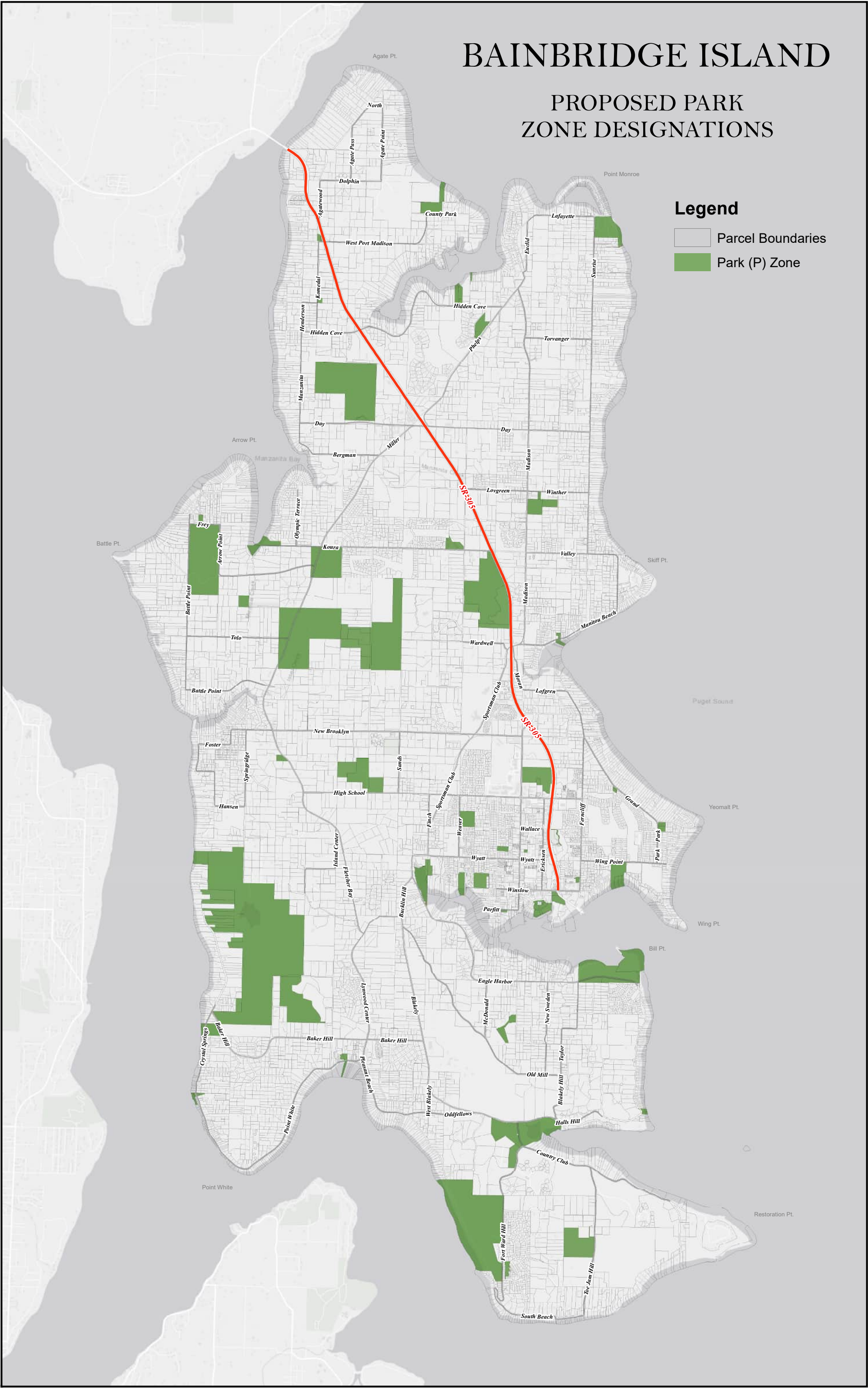


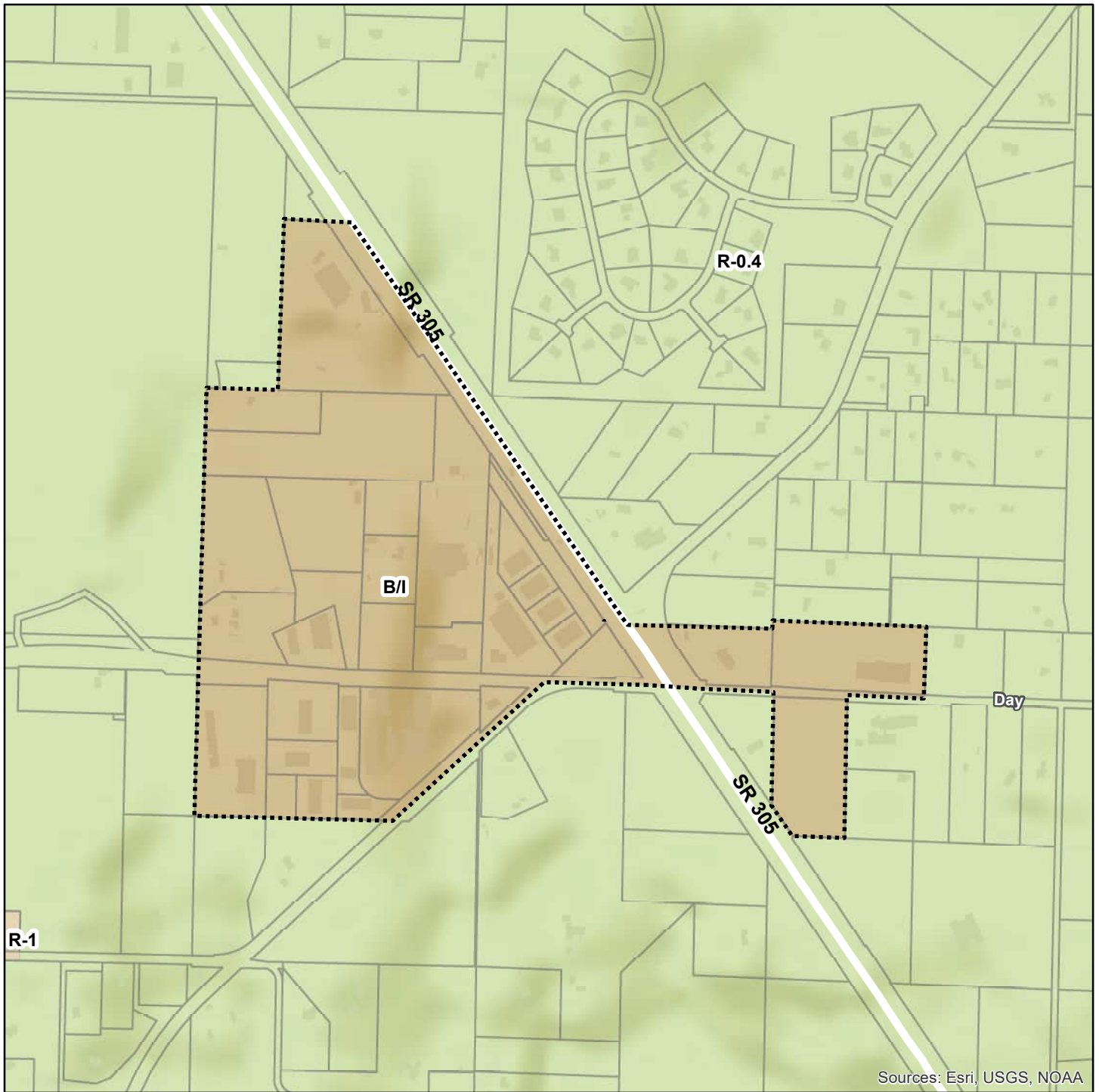
BAINBRIDGE ISLAND

PROPOSED PARK ZONE DESIGNATIONS

Legend

- Parcel Boundaries
- Park (P) Zone





DAY ROAD

(INDUSTRIAL CENTER)

Alternative 1 - Land Use & Transportation

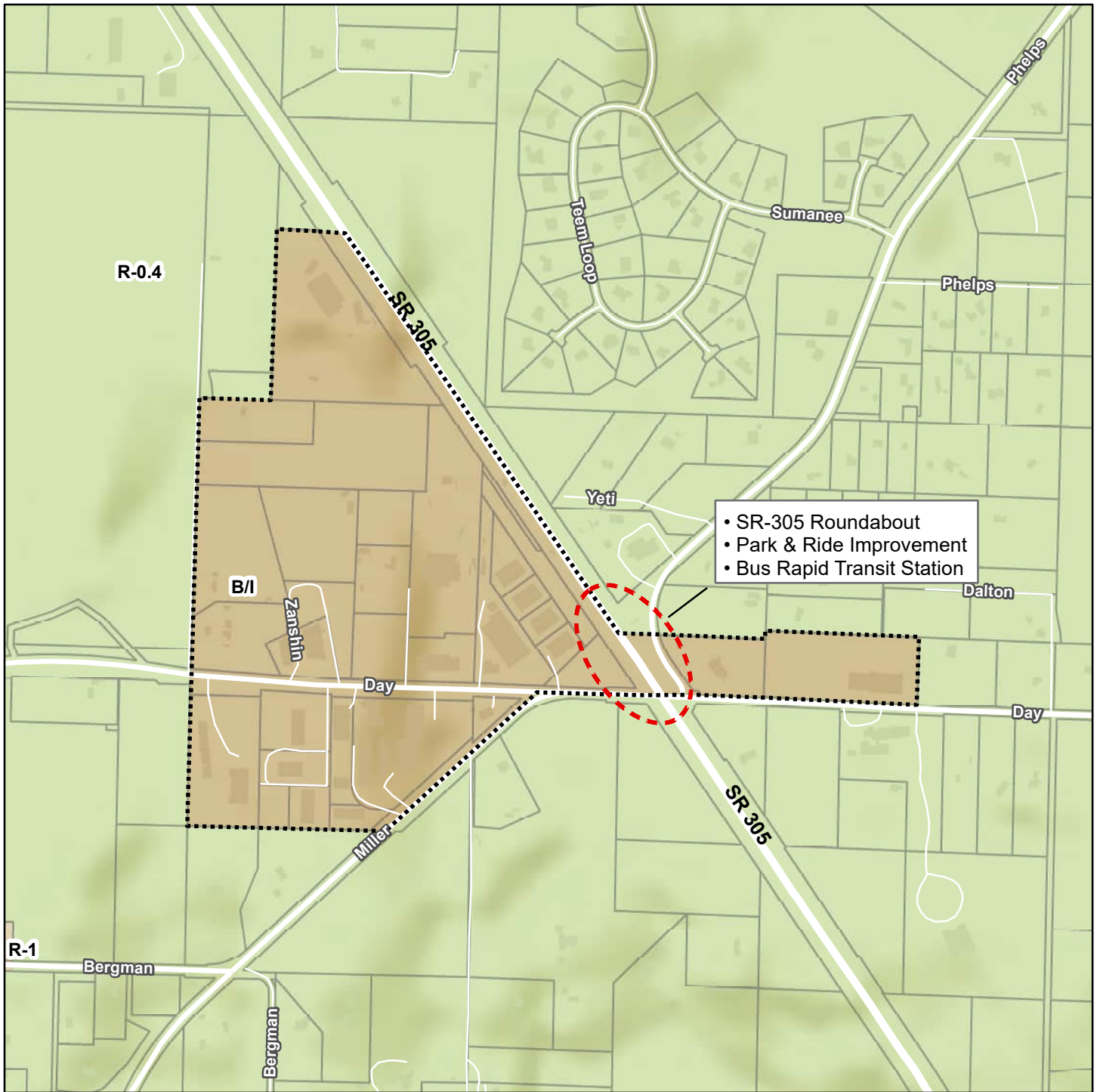
Legend

 Day Road Boundary	 Parcel	 Major Road	 Residential / Private
---	--	--	--

1 inch = 667 feet

0 230 460 920 Feet

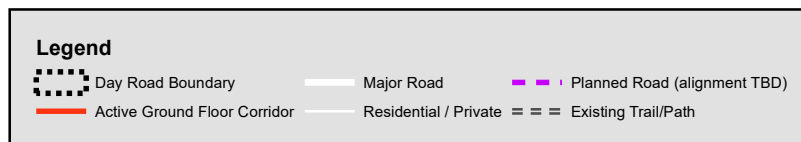




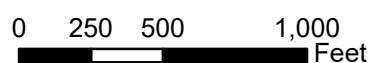
DAY ROAD

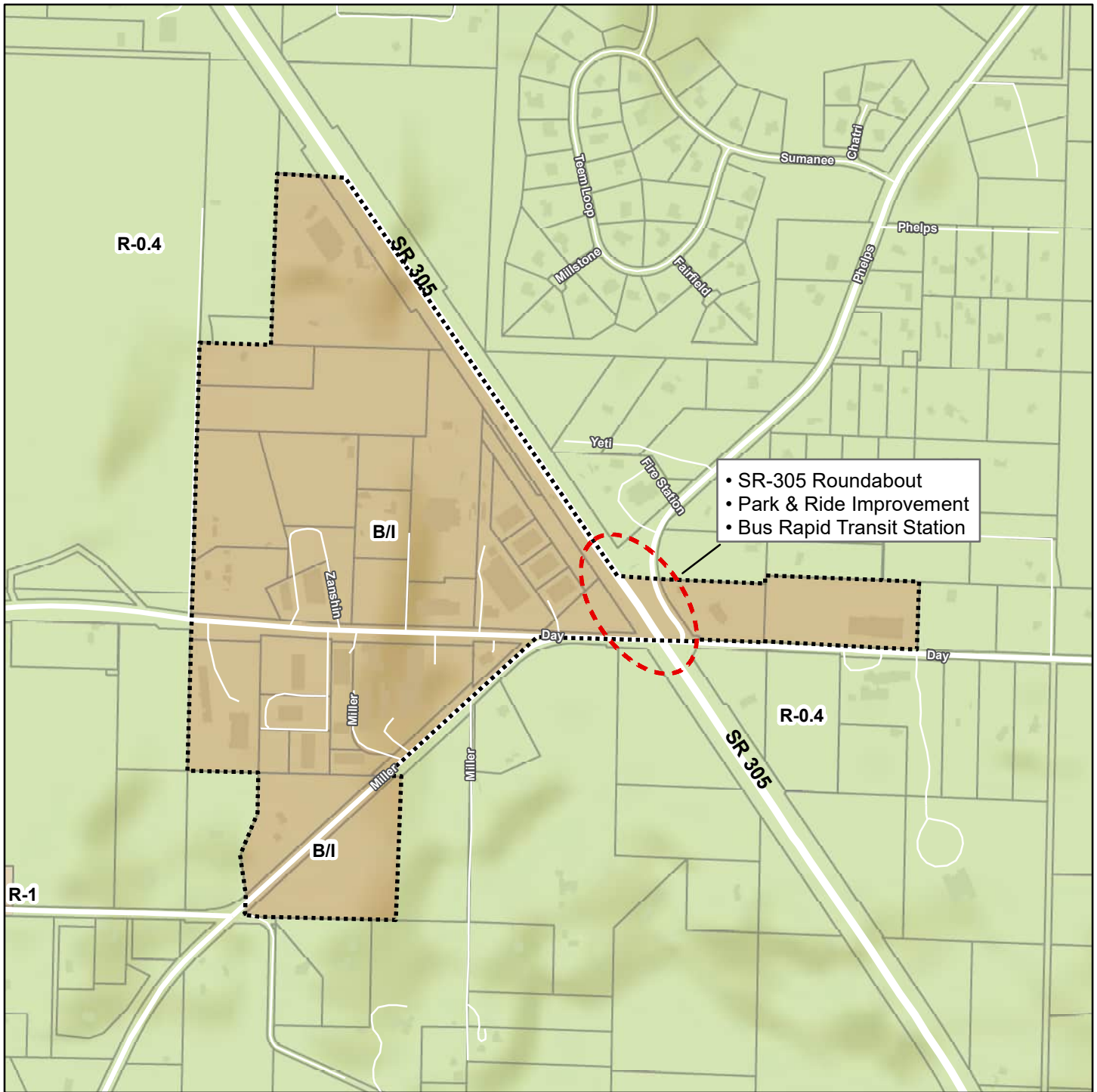
(INDUSTRIAL CENTER)

Alternative 2 - Land Use & Transportation



1 inch = 667 feet

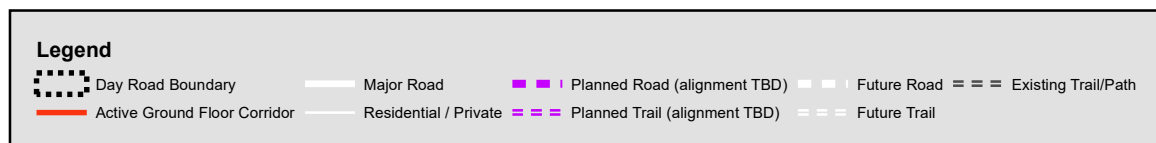




DAY ROAD

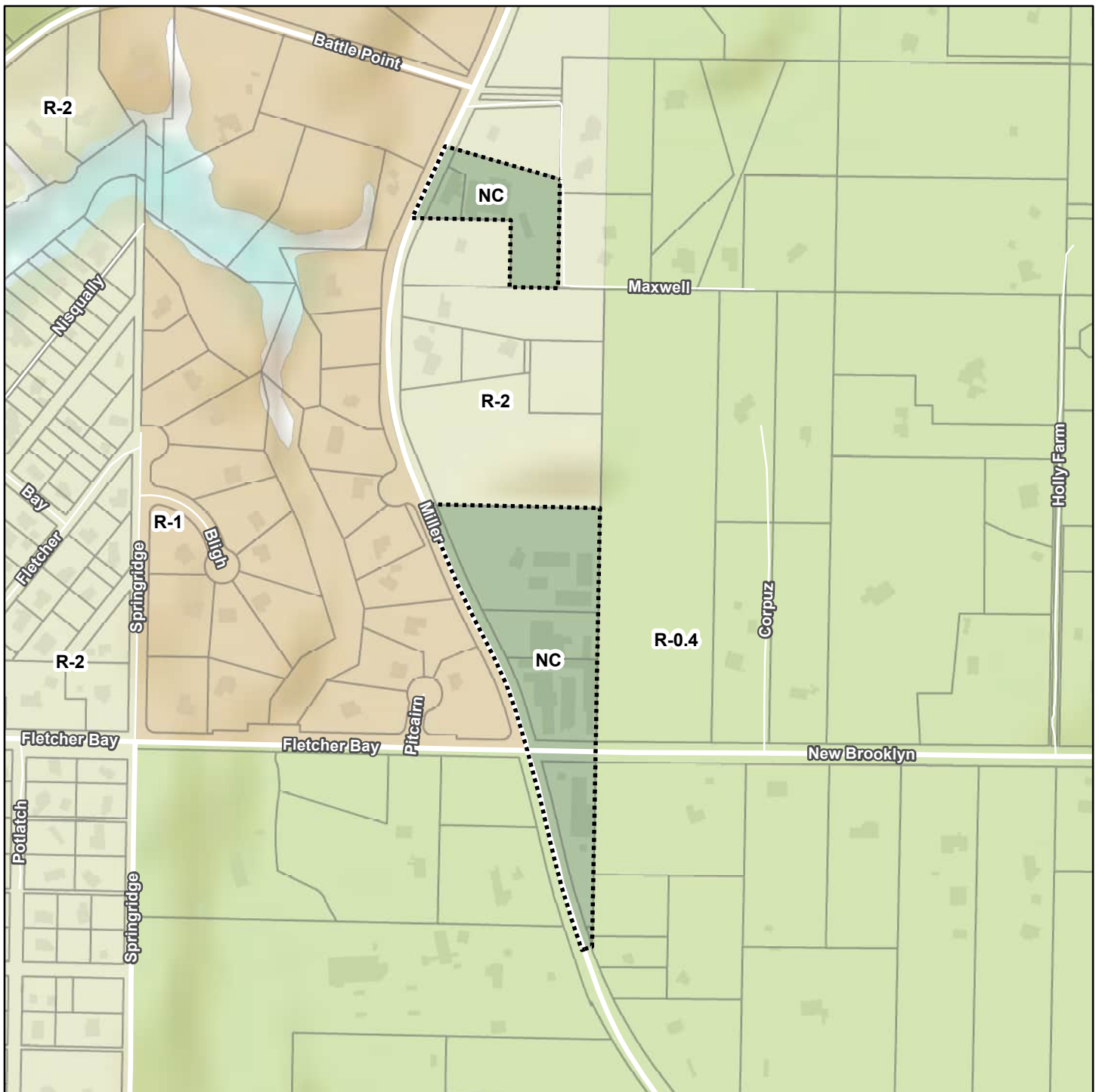
(INDUSTRIAL CENTER)

Alternative 3 - Land Use & Transportation



1 inch = 667 feet





ISLAND CENTER

(NEIGHBORHOOD CENTER)

Alternative 1 - Land Use & Transportation

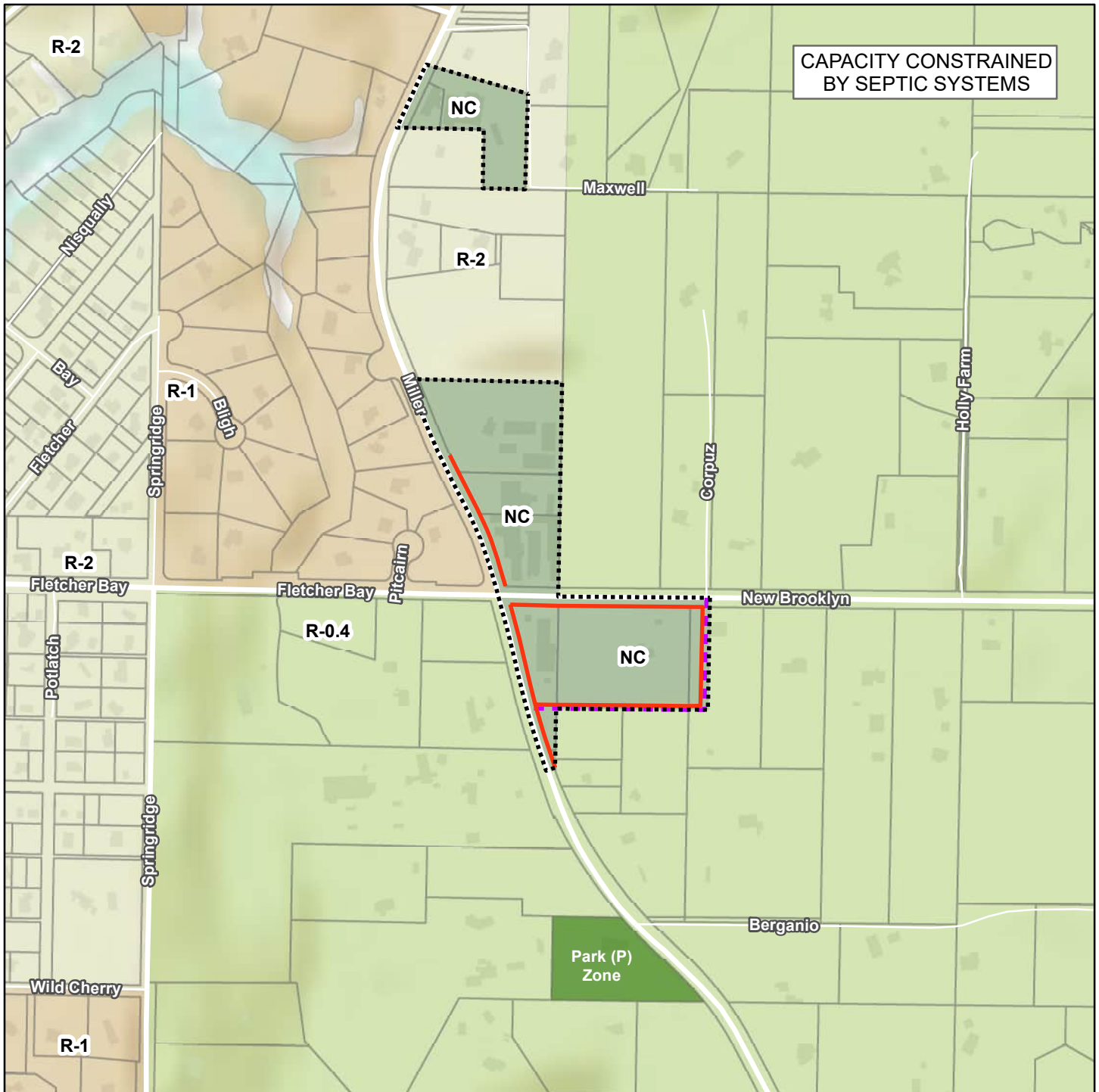
Legend

 Island Center Boundary
 Parcel
 Major Road
 Residential / Private

1 inch = 417 feet

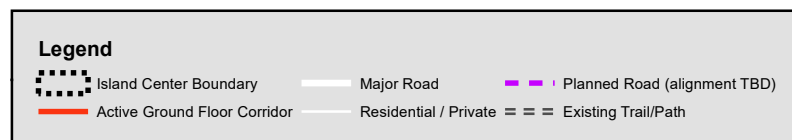
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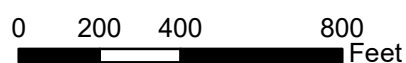


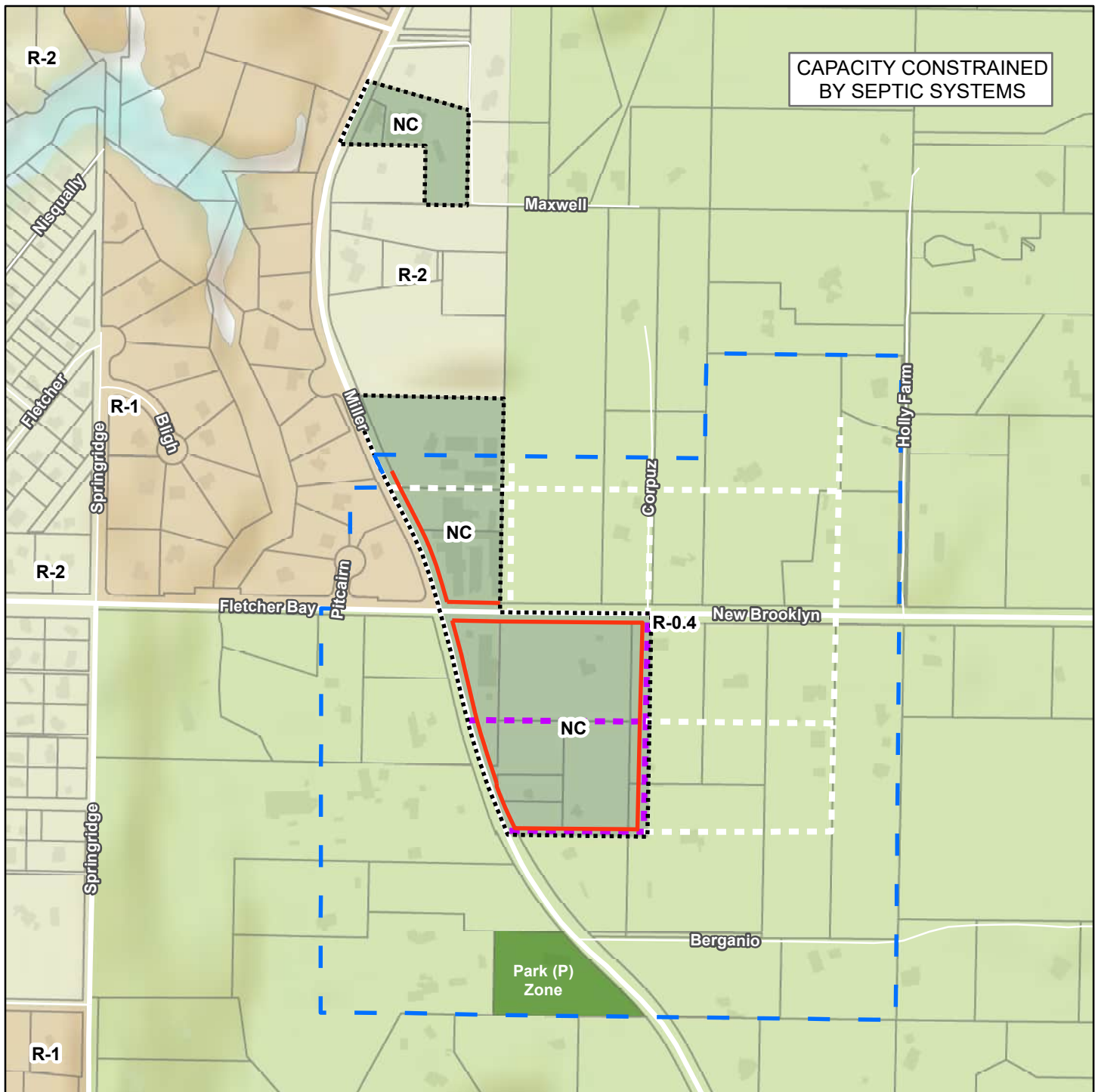
ISLAND CENTER (NEIGHBORHOOD CENTER)

Alternative 2 - Land Use & Transportation



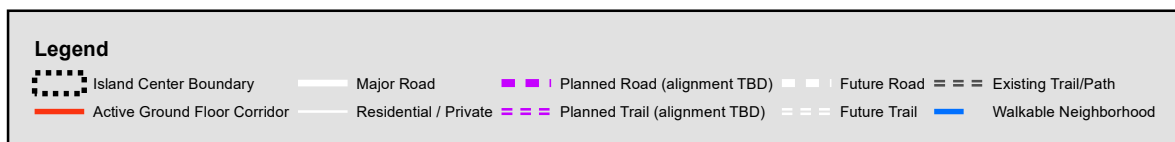
1 inch = 475 feet



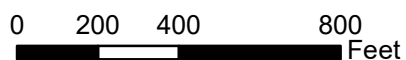


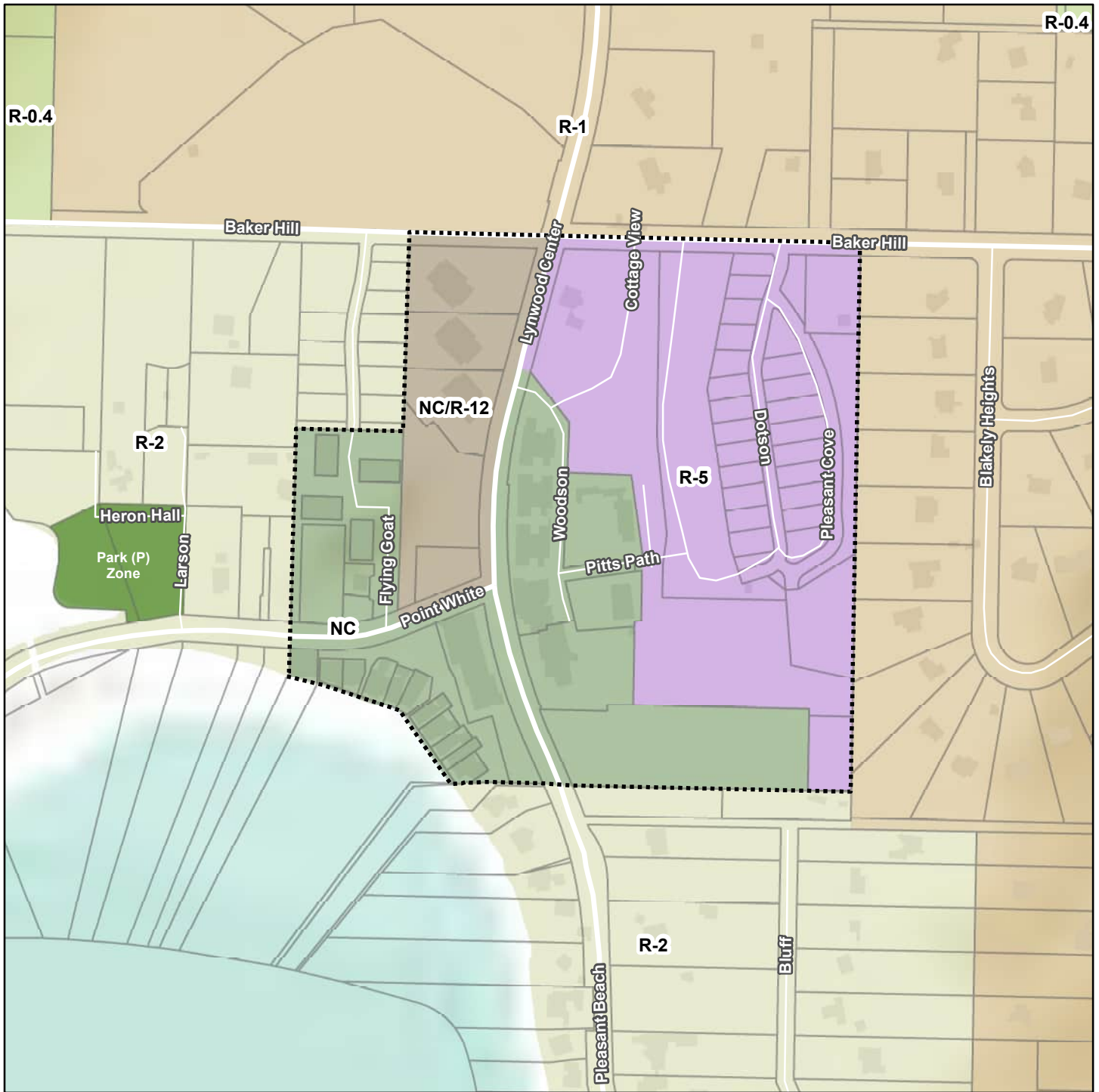
ISLAND CENTER (NEIGHBORHOOD CENTER)

Alternative 3 - Land Use & Transportation



1 inch = 475 feet

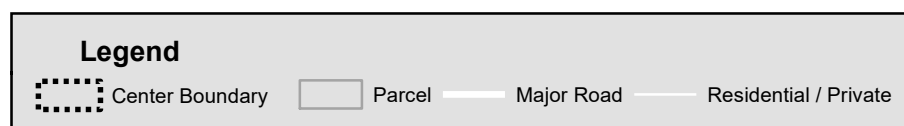




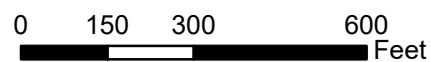
LYNWOOD CENTER

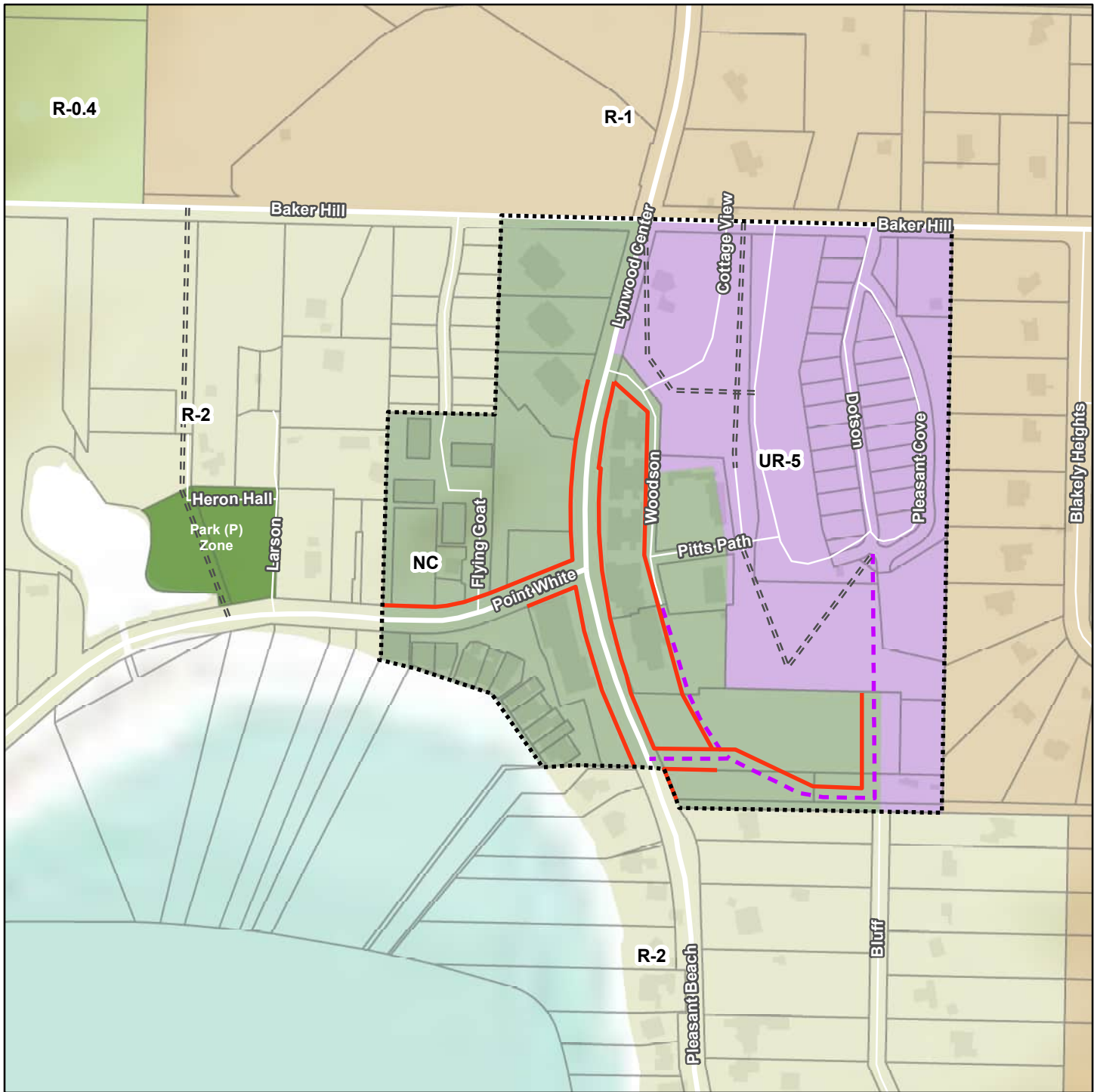
(NEIGHBORHOOD CENTER)

Alternative 1 - Land Use & Transportation



1 inch = 333 feet

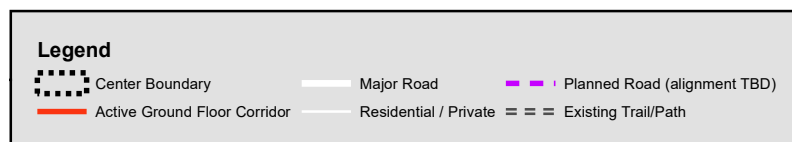




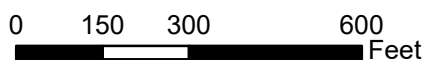
LYNWOOD CENTER

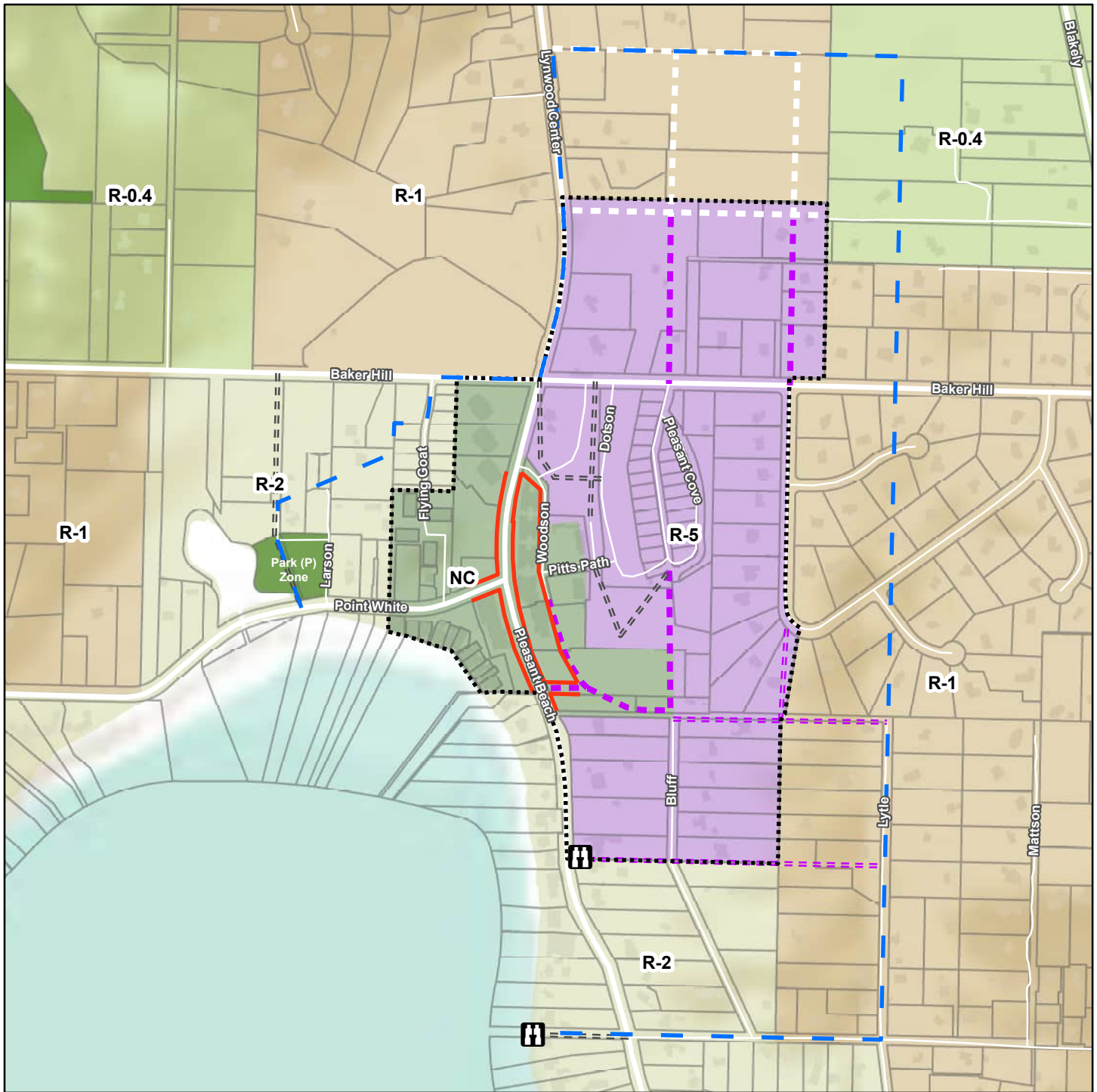
(NEIGHBORHOOD CENTER)

Alternative 2 - Land Use & Transportation



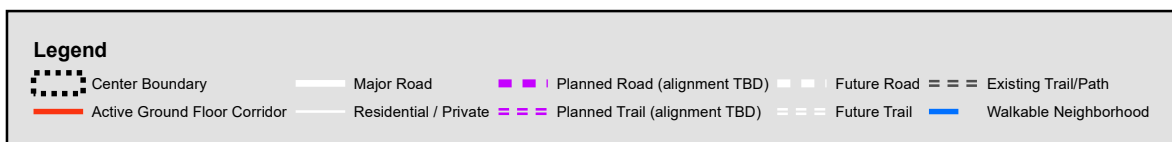
1 inch = 333 feet



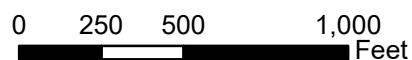


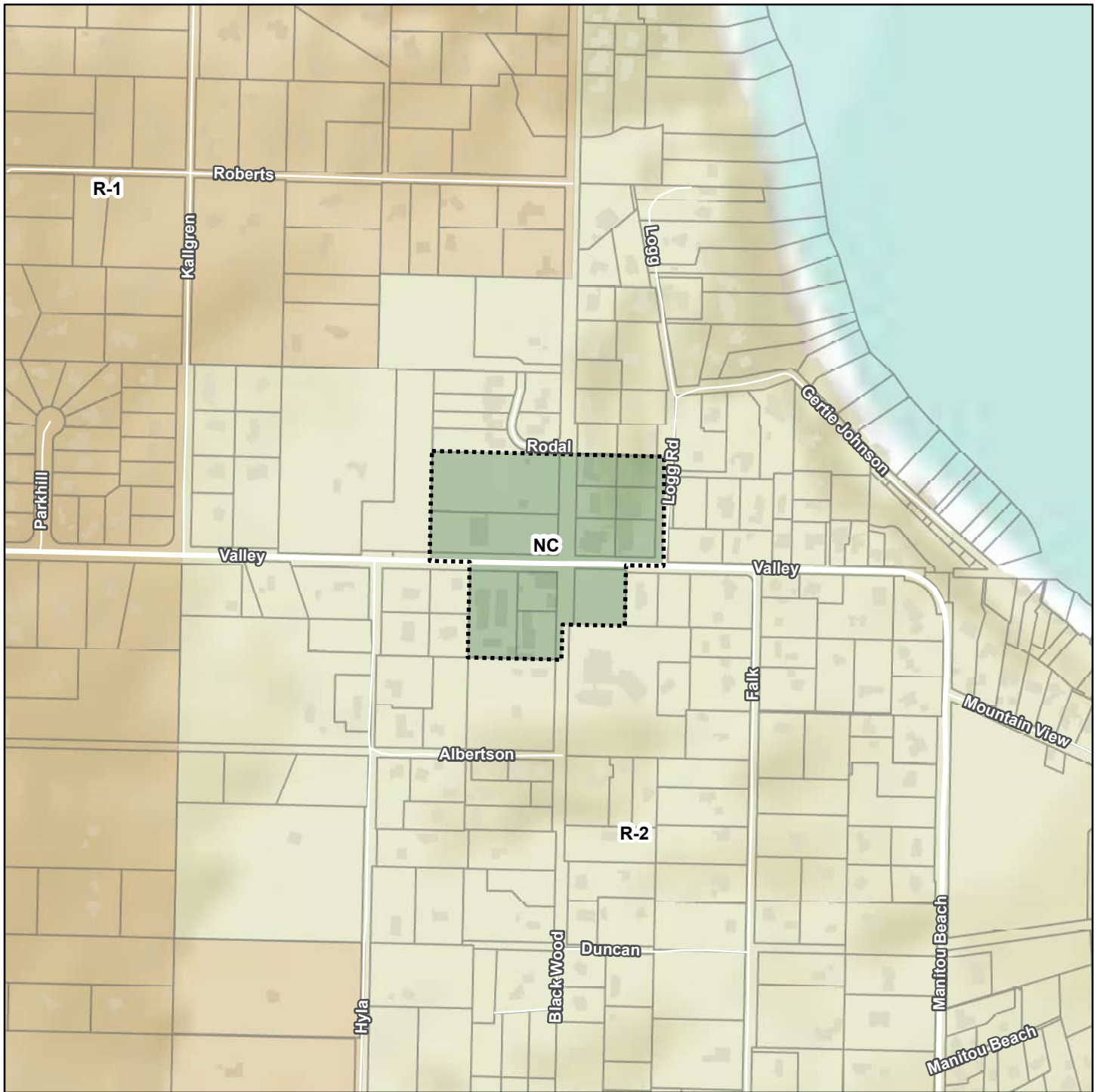
LYNWOOD CENTER (NEIGHBORHOOD CENTER)

Alternative 3 - Land Use & Transportation



1 inch = 583 feet





ROLLING BAY

(NEIGHBORHOOD CENTER)

Alternative 1 - Land Use & Transportation

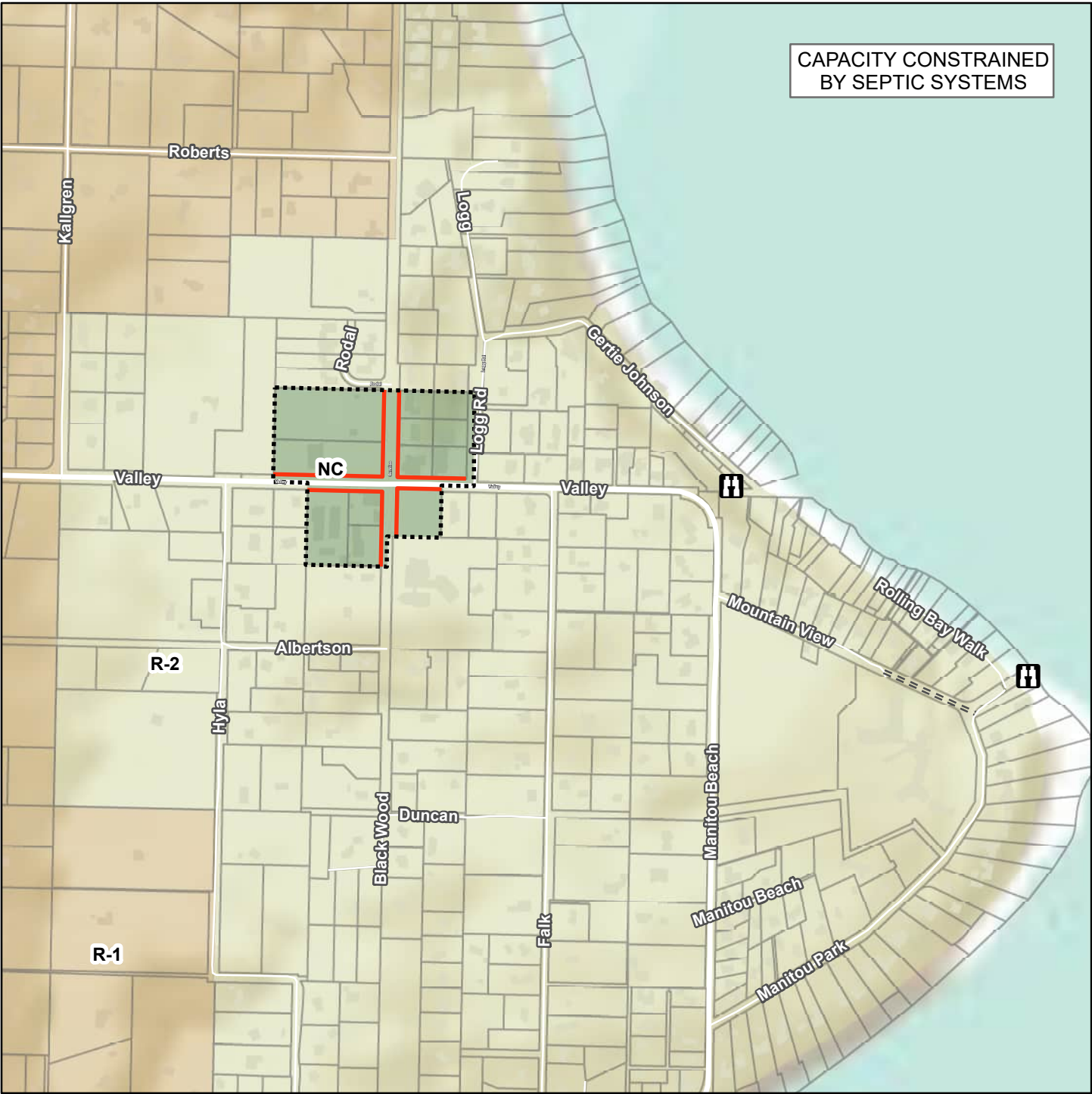
Legend

Center Boundary
 Parcel
 Major Road
 Residential / Private

1 inch = 500 feet

0 200 400 800 Feet



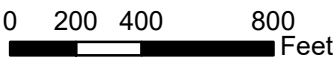


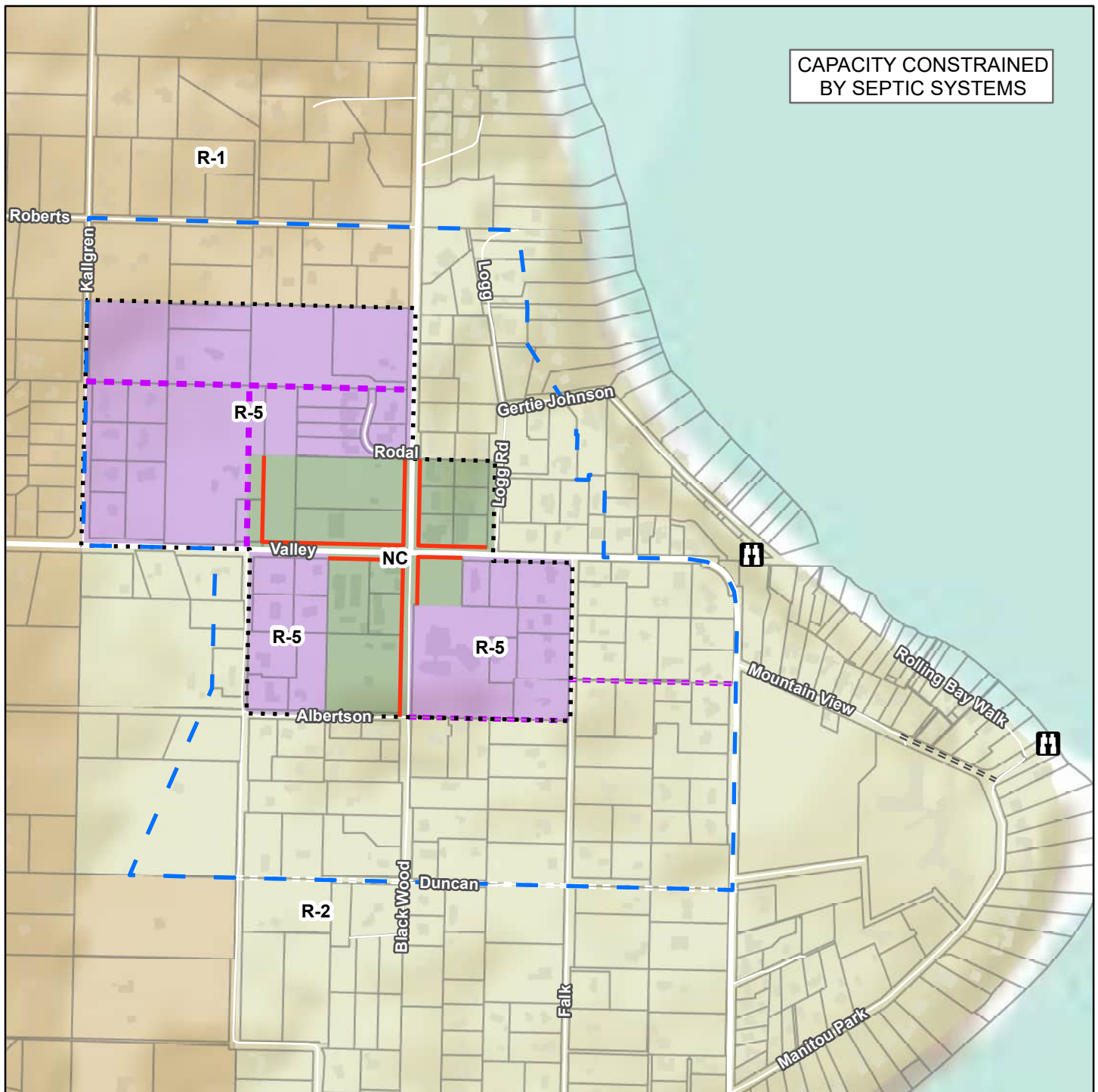
ROLLING BAY
(NEIGHBORHOOD CENTER)
Alternative 2 - Land Use & Transportation

Legend

Center Boundary	Planned Road (alignment TBD)	Major Road
Active Ground Floor Corridor	Existing Trail/Path	Residential / Private

1 inch = 583 feet





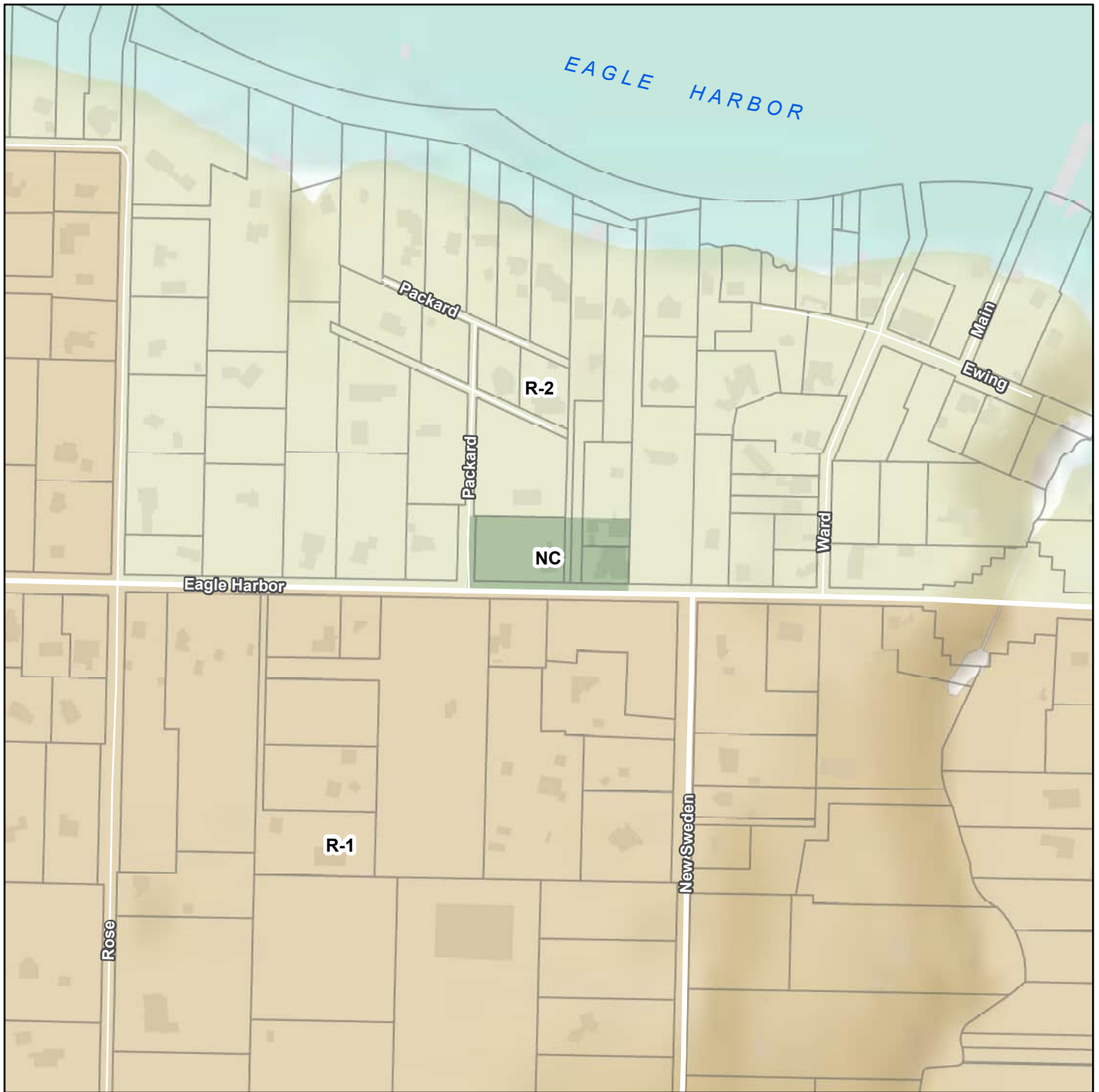
ROLLING BAY (NEIGHBORHOOD CENTER) Alternative 3 - Land Use & Transportation

Legend					
	Center Boundary		Major Road		Planned Road (alignment TBD)
	Active Ground Floor Corridor		Future Road		Existing Trail/Path
	Residential / Private		Planned Trail (alignment TBD)		Future Trail
			Walkable Neighborhood		

1 inch = 583 feet

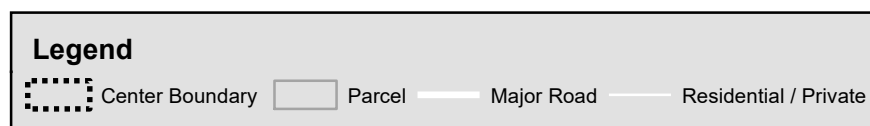
0 200 400 800 Feet



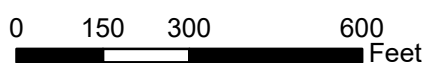


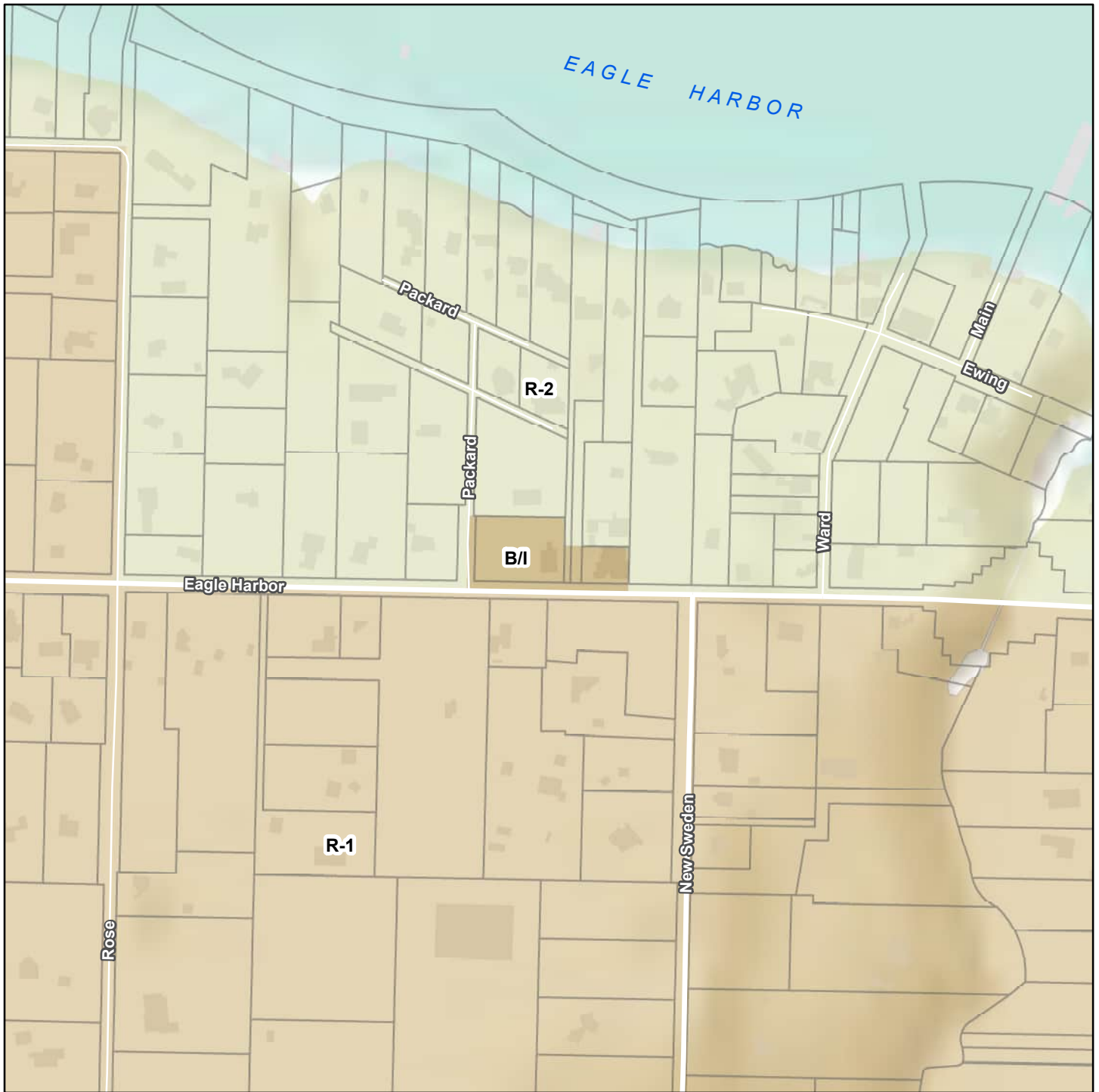
ISOLATED NC REZONE

Alternative 1 - Land Use & Transportation



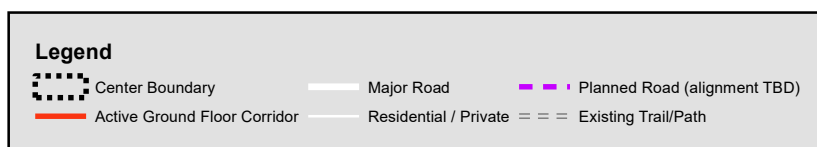
1 inch = 333 feet



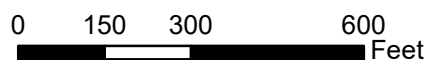


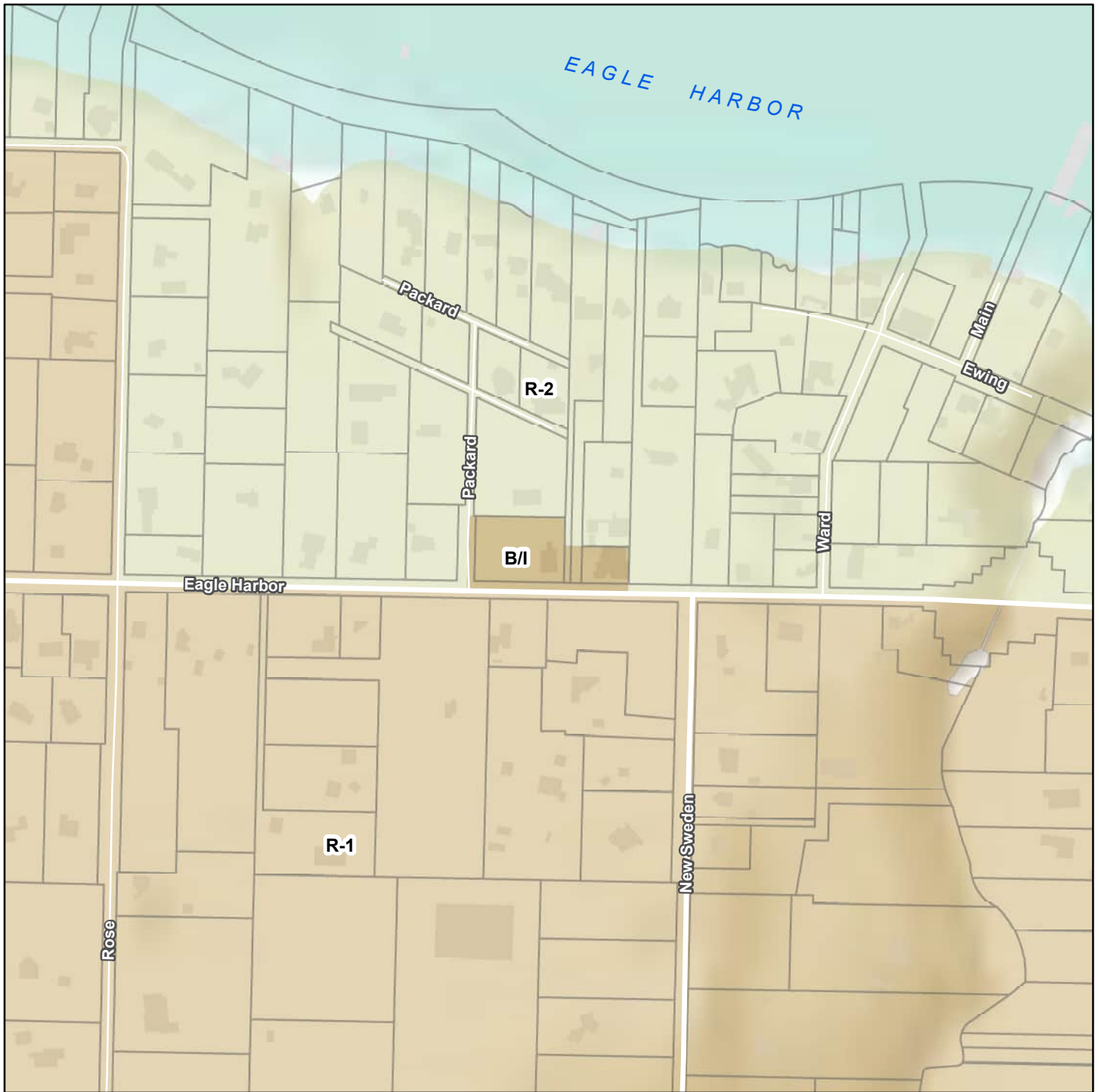
ISOLATED NC REZONE

Alternative 2 - Land Use & Transportation



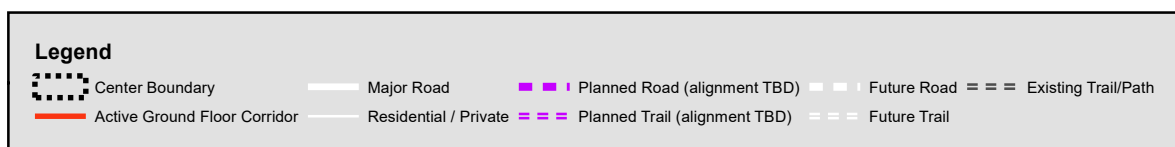
1 inch = 333 feet



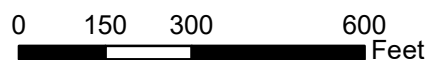


ISOLATED NC REZONE

Alternative 3 - Land Use & Transportation



1 inch = 333 feet



Appendix F

2021 Kitsap County Buildable Lands Report

https://www.kitsapgov.com/dcd/Pages/Buildable_Lands_Update.aspx