



ISLAND COUNTY PLANNING COMMISSION AGENDA
December 18, 2024, at 6:00 p.m.
BOCC HEARING ROOM, ROOM 102B, 1 NE 6TH ST COUPEVILLE, WA
ONLINE VIA ZOOM

**Meeting to be held in the Board of Island County Commissioners Hearing Room,
Room 102B, 1NE 6th St., Coupeville, WA and online. Interested parties can attend or join
remotely at the link or via phone number listed below:**

Join Zoom Meeting

<https://zoom.us/j/93636892599?pwd=Y3NicFcrc203OVZBTjBUenJyc21MQT09>

Meeting ID: 936 3689 2599

Passcode: 122086

+1 253 215 8782 US (Tacoma, WA)

Meeting ID: 936 3689 2599

Passcode: 122086

1. CALL TO ORDER
2. ROLL CALL
3. APPROVAL OF MINUTES –
4. PUBLIC COMMENT – *Submittal of written comments are encouraged prior to the day of the meeting. Public Comment may be submitted via email to PlanningCommission@IslandCountyWA.gov. Please state your name and address when giving public testimony. Public comments are limited to 3 minutes per person.*
5. DIRECTOR'S REPORT
6. WORKSHOP – Presentation by Community Based Organization (CBO) Island Roots Housing on their work plan in support of the 2025 Comprehensive Plan
7. WORKSHOP – Review of Mixed-Use Rural Areas of More Intensive Development (RAID) Analysis completed by Kimley Horn
8. ADJOURN

Please visit our website for related documents: <https://www.islandcountywa.gov/235/Planning-Commission>
The public may submit comments in writing to Planning & Community Development at 1 NE 7th St., Coupeville, WA 98239 or PlanningCommission@IslandCountyWA.gov.

MEMORANDUM

To: Emily Neff and Emily Carr
Island County

From: Joel Farias and Nick Chen
Kimley-Horn and Associates, Inc.

Date: November 15, 2024

Subject: DRAFT RAID Density Analysis Memo

The purpose of this memorandum is to describe the findings of the Island County Residential Areas of more Intensive rural Development (RAID) density analysis. RAIDs are also referred to as Limited Areas of More Intensive Rural Development (LAMIRD) under the Growth Management Act (GMA). The goal of the analysis is to identify potential existing barriers to higher density developments within Island County's mixed-use RAIDs and suggest regulation changes to reduce or remove the identified barriers.

INTRODUCTION

Island County, in compliance with the 2021 Washington House Bill 1220 amendments to the GMA, has allocated projected growth by population and income band. This new legislation requires jurisdictions to address the housing needs of extremely low-, very low-, low-, and moderate-income populations as part of their Comprehensive Plan updates. To satisfy this requirement, an analysis of the County's existing zoning and development regulations is required to show that the housing types and quantities that meet the need of each income bracket is available. The goal of this analysis is to propose code options to increase the housing types and densities allowed in Mixed-Use RAIDs to allow more affordable homes to be built and bridge the gap between current capacity and future need for homes affordable to households making under 80% area median income (AMI).

Table 1 shows that the Rural Center had the most developable acres while the Rural Service RAID had the least amount of capacity. One takeaway from these results is that code options aimed at increasing capacity should be focused on the Rural Center, Rural Village, and Camano Gateway Village RAIDs because of the higher amount of available land. Due to the small size and nature of the Rural Service RAID, recommendations to zoning were not made as part of this analysis. The deductions from gross acreage to net acreage are described in

Appendix A.

Table 1. Developable Area by Mixed-Use RAID Zone

Mixed-Use RAID Zone	Gross Development Potential (acres)	Net Development Potential (acres)
Rural Center (RC)	118.3	61.7
Rural Village (RV)	19.7	11.3
Camano Gateway Village (CGV)	23.1	15.0
Rural Service (RS)	0.8	0.4
Totals	161.8	88.5

ANALYSIS

Island County Code defines mixed-use as “a development with multiple functions within the same building (either stacked units and/or shared walls) or in multiple buildings on a single lot (integrated by building design, adjacency, site plan/layout, and circulation patterns). It may or may not include a residential component. Typically, a mixed-use structure may have non-residential uses at street level with residential uses on the second floor.” For this analysis, mixed-use developments with residential components are the subject. These developments typically include smaller, more affordable attached dwelling units.

Identifying barriers to housing

The first part of the analysis was to identify barriers to building denser housing types in Mixed-Use RAID zones. A zoning regulation analysis was performed using WA State Department of Commerce Barrier review checklists. The checklists are specifically designed to identify any barriers in the jurisdiction’s code for certain housing types. The goal of this analysis is to identify code options in mixed-use RAID zones that would allow for higher density mixed-use developments to be built.

Mixed-use development typically consists of a ground floor commercial use with additional stories of residential uses. These types of developments are often called vertical mixed-use which are covered by “low-rise housing types” in the Barriers to housing checklists. The checklists for low and mid-rise housing types were filled out and attached as **Appendix B**.

Findings from the Barrier review checklists are shown in **Table 2**. For a complete list of findings from the checklists, see **Appendix B**.

Table 2. Barriers to Low and Mid-rise Housing Types

Barrier	Explanation
Unclear development regulations	
High minimum lot sizes	Each of these standards are regulated by the Island County Department of Health (Health) on a site-by-site basis with the phrasing “maximum permitted by Health requirements.”
Low maximum densities or low maximum FAR	These are barriers due to the site-by-site specificity of the requirements.

Barrier	Explanation
Low maximum building heights	<p>The max build height is 2-3 stories in the mixed-use RAID zones, which limits mixed-use developments to only one or two residential stories when requiring ground floor commercial.</p>
Other (for example: ground floor retail requirements, open space requirements, complex design standards, tree retention regulations, historic preservation requirements)	<p>Existing regulations limit:</p> <ul style="list-style-type: none"> - Rural Center (RC) Zone mixed-use developments to a maximum of 6 dwelling units. Also limited to 50,000 sf of gross floor area. - Camano Gateway Village (CGV) Zone mixed-use developments to a maximum of 10,000 sf. <p>A maximum of 6 dwelling units per development is strict and may prohibit a majority of mixed-use developments. 6 dwelling units at ~1,100 sf average per unit would require at least two 4,000 sf stories dedicated to residential in a mixed-use development.</p> <p>Mixed-use RAID zones have high max impervious surface and lot coverage standards. Paired with the above requirements, this may indicate a vision of having small-lot mixed-use buildings which would be against Health standards for minimum lot size on private septic/well.</p>
Conditional use permit process	<p>Island County Use tables indicate two different conditional use decisions: Administrative Decision and Quasi-Judicial Decision.</p> <p>An Administrative Decision is required for a mixed-use development under the following conditions:</p> <ul style="list-style-type: none"> - In the RC Zone if over 12,000 sf of gross floor area. - In the CGV Zone if over 4,000 sf of gross floor area. - In the RV zone if proposing between 9 to 20 dwelling units. More than 20 units requires a Quasi-Judicial Decision. <p>Administrative Decisions are made by the Planning or Public Works director, require a notice of application, and are subject to an open record appeal to the hearing examiner.</p> <p>Under these regulations a two-story mixed-use development in the CGV Zone with two-dwelling units (average 1,100 sf per unit) with ground floor commercial would require a Conditional use permit.</p>

Barrier	Explanation
Limited land availability and environmental constraints	There are 161 combined acres of vacant and re-developable land in the RC, RV, and CGV zones. After deducting area encumbered by critical areas, there are about 146 acres remaining. At an average allowed density of 2 du/ac (under existing Health regulations), there is a resulting capacity of 192 dwelling units (includes deductions for infrastructure, likeliness of redevelopment, and units that will only be occupied seasonally).
Environmental constraints	Environmental constraints are limited to the need for private septic and private well which require large setbacks from each other.

The major findings from the checklists were that low maximum densities, high minimum lot sizes, and restrictive permitting requirements may present significant barriers to building low and mid-rise housing types. These barriers can be largely attributed to the rural nature of RAIDs and the necessity for any developments in RAIDs to be serviced by individual wells and septic systems.

Analysis of other jurisdictions

A review of other County's rural mixed-use zoning regulations was completed to supplement the findings from the Barriers to Housing Checklists. Specific zoning regulations can be focused by comparing the zoning regulations of the mixed-use RAIDs in Island County to other rural County mixed-use zoning regulations.

This analysis compared Island County's current regulations in mixed-use RAIDs with the total average of the regulations from other counties in the state that have RAIDs (or LAMIRDs). The findings from this analysis are included in **Table 3**.

Table 3. County RAID/LAMIRD Comparison

County	Zone allowing mixed-use or multifamily (MF)	Max density in Mixed-Use/MF	Allowed units per building	Minimum lot size	Max building height	Conditions
<u>Island</u>	RC, RV, CGV	~2-3 du/ac	6	Health	30-40 ft	Max 2.5 stories in CGV zones.
<u>Kittitas</u>	R	8 du/ac	2	10,000 sf	35 ft	Duplexes allowed on 10,000 sf lots MF allowed as Conditional Use (development standards are unclear for MF)
<u>Lewis</u>	STMU	12 du/ac MU <u>24 du/ac MF</u>	NA	Health	<u>35-50 ft</u>	Requires centralized water and wastewater system

Kitsap	KVC	5 du/ac	NA	NA	35 ft	Only for mixed-use developments
Whatcom	STC	6 du/ac	2	None , must meet setback requirements.	45 ft	Mixed-use allowed , provided, that no more than 50 percent of the structure shall be used for residential dwellings.

Kimley»Horn

RECOMMENDATIONS

A menu of code options was prepared using the findings from both the Barriers to Housing analysis and the Analysis of other Jurisdictions. **Table 4** shows possible code revisions that can be implemented to increase the housing types in mixed-use RAID zones. Development strategies and code options that incentivize the build out of more affordable housing types were **bolded**. The table also shows how the result of implementing the code option would change the allowed development.

Table 4. Possible Code Options

Code Subject	Change	Possible conditions/incentives	Result	Considerations
Density	Up to 12 DU per acre for mixed-use developments.	Require at least ground floor commercial or 20-30% commercial dedicated floor area. Require at least 1 acre lot for septic or require connecting to community septic with capacity. Incentive: 10% permanently affordable (under 50% AMI) to get an additional 4 du/ac (up to 16 du ac)	Under current existing code, a density of 12 du/ac is allowed in the Rural Center zone, only within the Clinton RAID. Expanding this max density to all of the mixed-use RAIDs under certain conditions would create more capacity for housing affordable to households making under 80% AMI.	Health would need to set standards for septic needs specific to each development, which may increase cost of development. RAID vision (design standards). Density only possible in conjunction with an increase in height limits and max building gross floor area.
Lot Size	0.5-acre minimum lot size or less with Health approval	Require Health approval.	Clarity on lot size standards and requirements. 0.5 acre lots are already allowed in the CGV zone.	This is only feasible assuming that all of the mixed-use RAID zones were designated on areas with existing centralized/community water supply and would not drill additional private wells (which would require 1 acre lots).

Code Subject	Change	Possible conditions/incentives	Result	Considerations
Building Height	Increase building height to 40 feet in all mixed-use zones.	Require step-back for third floor or other design standards.	<p>Less environmental impact with taller buildings on similar size lot and increased flexibility. (Example: Situation 1 is a 12,000 single-story gross floor area building on a 0.5 acre lot would cover 55% of the lot with the building envelope and 85% of the lot in impervious surface. Situation 1 yields 6-8 attached dwelling units with no commercial space. Situation 2 is a three-story 35-40ft tall structure on a 4,000 sf building envelope on a 0.5 acre lot. Situation 2 would cover 18-20% lot with the building and about 34-40% of the lot with impervious surface. Situation 2 yields approximately 3,400 sf of ground floor commercial and 5,600-6,000 sf of residential floor area, which is enough for 5-6 dwelling units (10-12 du/ac) which could be affordable to households making under 80% AMI.)</p>	Utility constraints, community vision for the RAID, and increase in need for public services (fire safety, transportation).
Allowed use provisions	Conditional use (Type 2) should be required for buildings over 6,000 sf building envelope	Specify design standards in place of requiring conditional use permits for mixed-use development. This can lead to further increasing the conditional use threshold.	This would allow for three story buildings like the one in Situation 2 of the above cell to be built without having to go through conditional use permitting.	<p>It may be expensive and time consuming to build out specific design standards for each mixed-use RAID zone. Could consider a more standardized approach.</p>
Units per building	Allow up to 8 units per building in all mixed-use developments in mixed-use RAID zones	Consider a percentage of overall floor area which must be commercial. May specify first floor requirement.	Could yield a mixed-use developments with a combination of affordable dwelling units and commercial space (ground floor 5,100 sf total commercial space and two stories 8,400 sf total residential space all on a 6,000 sf building envelope. About 8 units yield, requiring 16-20 parking stalls for the entire development).	Dependent on Health requirements.

Potential Results

The recommendations and analysis in this memo would ultimately lead to an increase in the housing capacity of the mixed-use RAID zones. The increase in total housing capacity can be estimated using the LCA methodology in the CPPs. Under current CPPs there are four deductions and market factors that are applied which effectively halve the gross acreage of eligible lots (vacant and re-developable). If these factors changed, there would be a large difference in final housing capacity.

The results in Table 5 show the increase in housing capacity for each mixed-use RAID zone if the zoning standards were revised per the recommendations in this memo. These results assume that code revisions would mirror the recommendations in this memo, or that any code revisions not recommended in this memo would achieve similar results. These results also assume that if a 12 du/ac density was allowed in all of the mixed-use RAID zones, there would still be developments proposed under that density (hence, 8 du/ac in the RV and CGV zones).

Table 5. Potential Increase to Housing Capacity

Zone	Gross Acreage	Net Acreage	Proposed Density	New Housing Capacity	Current Housing Capacity	Housing Capacity increase
RC	118.3	61.7	12	740	124	617
RV	19.7	11.3	8	90	23	67
CGV	23.1	15.0	8	119	45	74
Totals	161.0	88.0		949	192	758

Overall, when allowing up to 12 du/ac in mixed-use RAID zones, there is sufficient developable area for an increase to 949 dwelling units. To accomplish these results, close coordination with Health will be required in conjunction with recent state law changes via [SB 5275](#) for LAMIRDs which provided increased flexibility where there are public services and facilities to serve additional density. “Within a LAMIRD, any development or redevelopment of building size, scale, use, or intensity may be permitted subject to confirmation from all existing providers of public facilities and public services of sufficient capacity of existing public facilities and public services to serve any new or additional demand from the new development or redevelopment. Development and redevelopment may include changes in use from vacant land or a previously existing use so long as the new use is consistent with the local character.”



Appendix A



Appendix B

Avg Household size: 2.31

Vacancy Rate: 14.30%

ACS 2016-2020 5-Year Estimate S1101

2020 Decennial Census

Seasonal/Recreational Factor: 10.73%

Employment Capacity Rate: 17 Jobs per acre

Rural Center Zone: This zone permits a range of commercial, light manufacturing and multi-family uses that serve a broad geographic area. Mixed-use structures are encouraged.

Barrier review checklists

Exhibit B1: Moderate Density housing barrier review checklist

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
DEVELOPMENT REGULATIONS			
Unclear development regulations	Yes, there are unclear standards for the correct densities in RAIDs. There are different densities mentioned in separate sections of the code, mentioning a "base" density, minimum lot size, and max density/rooms.	RC (RAID) zone has a max residential density of "maximum permitted by County Health Department requirements" and Clinton RAID says 12 du/ac max for RC zoned area in the Clinton RAID.	Work with County Health department to create standard densities based on County Health Dept criteria and County's land use vision.
Prohibiting some moderate density housing types, such as: Duplexes Triples Four/five/six-plexes Townhomes Cottage housing Live-work units Manufactured home parks	No. All these housing types are either permitted or not identified.		Use table could be updated to include the conditions to build some of the unidentified housing types. Some jurisdictions lump together triple to six-plex with multifamily or townhomes.
High minimum lot sizes	Yes.	Minimum lot size is controlled by health department. 1 acre lot size per housing unit on non-public water and 0.5 acre per unit on public water.	Work with Health Department to find solutions for smaller lots and housing types that use less water (less irrigation, smaller families).
Low maximum densities or low maximum FAR	Yes.	RC (RAID) zone has a max residential density of "maximum permitted by County Health	Work with County Health department to create standard densities based on County Health Dept

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
		Department requirements" and Clinton RAID says 12 du/ac max for RC zoned area in the Clinton RAID.	criteria and County's land use vision. Ideal density for mixed-use development is 12-24 du/acre (depending on max height)
Low maximum building heights	No. For moderate housing types, 3 stories maximum with a max height of 40 feet is feasible and won't limit development.	Duplexes to six-plexes rarely develop over 3 stories.	
Large setback requirements	No.	No front setback from roads required. 10 ft rear and side setbacks are not a huge problem.	
High off-street parking requirements	No.	1.5 parking spaces per dwelling unit is typical.	Consider a lower required parking space rate for studio units.
High impervious coverage limits	No.	80% max lot coverage/impervious surface is not likely to inhibit any type of moderate density development. The 20% open space requirement would typically be met from the setbacks.	
Lack of alignment between building codes and development codes	No.	Building design code 17.03.180 does not inhibit moderate density development.	
Other (for example: complex design standards, tree retention regulations, historic preservation requirements)	Overall, the code requirements for each zone are in a lot of different places and direct links and references are not always provided.	Landscaping, parking, and lot coverage/impervious surface/open space requirements aren't mentioned in the specific zone's section.	

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
PROCESS OBSTACLES			
Conditional use permit process	Not studied as part of this analysis.		
Design review	Not studied as part of this analysis.		
Lack of clear and accessible information about process and fees ¹³⁶	Not studied as part of this analysis.		
Permit fees, impact fees and utility connection fees	Not studied as part of this analysis.		
Processing times and staffing challenges	Not studied as part of this analysis.		
SEPA process	Not studied as part of this analysis.		
LIMITED LAND AVAILABILITY AND ENVIRONMENTAL CONSTRAINTS	No.	There is approximately 118 acres of vacant and re-developable land. Which is the most out of the mixed-use RAID zones.	Consider increasing the boundaries of RAIDs to include more properties or make re-zoning into a mixed-use RAID zone easier if your property is adjacent to the boundary.
Lack of large parcels for infill development	No.	Sufficient number of parcels classified as vacant/re-developable.	Consider increasing the boundaries of RAIDs to include more properties or make re-zoning into a mixed-use RAID zone easier if your property is adjacent to the boundary.
Environmental constraints	Yes.	Lack of public sanitary sewer systems.	

¹³⁶ For example: guidance resources are unclear or difficult to find, no digital permit tracking system, staff do not provide fee estimates or permitting time estimates are unavailable or inaccurate.

Exhibit B2: Low-Rise or Mid-Rise housing barrier review checklist

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
DEVELOPMENT REGULATIONS			
Unclear development regulations	Yes, there are unclear standards for the correct densities in RAIDs. There are different densities mentioned in separate sections of the code, mentioning a "base" density, minimum lot size, and max density/rooms.	RC (RAID) zone has a max residential density of "maximum permitted by County Health Department requirements" and Clinton RAID says 12 du/ac max for RC zoned area in the Clinton RAID.	Work with County Health department to create standard densities based on County Health Dept criteria and County's land use vision.
High minimum lot sizes	Yes.	Minimum lot size is controlled by health department. 1 acre lot size per housing unit on non-public water and 0.5 acre per unit on public water.	Work with Health Department to find solutions for smaller lots and housing types that use less water (less irrigation, smaller families, newer and more efficient fixtures).
Low maximum densities or low maximum FAR	Yes.	RC (RAID) zone has a max residential density of "maximum permitted by County Health Department requirements" and Clinton RAID says 12 du/ac max for RC zoned area in the Clinton RAID.	Work with County Health department to create standard densities based on County Health Dept criteria and County's land use vision.
Low maximum building heights	Yes. The max build height is 3 stories, which limits mixed-use development to only two stories of residential. Low-rise buildings are typically 3-6 stories	Required ground floor commercial limits residential portions of mixed-use developments to only two stories.	An increase to 4 stories maximum for mixed-use developments may only result in an increase from 40ft max build height to 45 ft. This will make it easier to build to max density and make smaller/tougher lots more marketable.
Large setback requirements	No.	No front setback from roads required. 10 ft rear and side setbacks are not a huge problem.	Consider specifying any required setbacks from incompatible uses.

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
			Consider specifying if the side setback is total or each side.
High off-street parking requirements 17.03.180 Q. Parking, access, and circulation.	No. Mixed-use developments combine residential and commercial parking requirements.	1.5 parking spaces per multi-family dwelling unit is typical.	Consider a lower required parking space rate for studio units. Consider incentivizing bike parking (can also reduce required parking standards near transit).
High impervious coverage limits	No.	80% max lot coverage/impervious surface is generous, and the open space requirement would typically be met from the setbacks.	Consider a higher max lot coverage if there is a nearby (quarter mile) recreation facility or park.
Lack of alignment between building and development codes	No.		
Other (for example: ground floor retail requirements, open space requirements, complex design standards, tree retention regulations, historic preservation requirements)			
PROCESS OBSTACLES			
Conditional use permit process 17.03.035 - Use tables	Yes. Mixed-use developments require a conditional use permit if over 12,000 sf of gross floor area. Table Note. 6 also limits multi-family and mixed-use developments to a maximum of 6 dwelling units	This threshold is strict. A 2-story building with 6,000 sf ground floor area would require a CUP under these regulations. Developers are often put off by the necessity of a CUP. If the objective of CUP in this case is for design review, then we suggest removing CUP as a requirement for smaller buildings and adding more design requirements.	Consider increasing the CUP requirement in the RC Zone. If the goal is to have smaller multi-family and mixed-use buildings (building envelope) then consider an increase to a gross floor area scaling with stories. This would maintain a low impact to the environment in terms of disturbed area. For example, CUP required if

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
			<p>a 2-story building exceeds 12,000 gross floor area scaling up to 18,000 gross floor area for a 3-story building.</p> <p>Currently, 6 dwelling units max per building is not achievable for mixed-use buildings without a CUP (assuming 2 story building, ~1300 sf per unit, ground floor commercial, 2nd floor residential)</p>
Design review	Not studied as part of this analysis.		
Lack of clear and accessible information about process and fees	Not studied as part of this analysis.		

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
Permit fees, impact fees and utility connection fees	Not studied as part of this analysis.		
Process times and staffing challenges	Not studied as part of this analysis.		
SEPA process	Not studied as part of this analysis.		
LIMITED LAND AVAILABILITY AND ENVIRONMENTAL CONSTRAINTS	No.	There is approximately 118 acres of vacant and re-developable land. Which is the most out of the mixed-use RAID zones.	Consider increasing the boundaries of RAIDs to include more properties or make rezoning into a mixed-use RAID zone easier if your property is adjacent to the boundary.
Lack of large parcels for infill development	No.	The number of parcels classified as vacant/re-developable in the RC zone could greatly help meet capacity for lower AMI households.	Consider increasing the boundaries of RAIDs to include more properties or make rezoning into a mixed-use RAID zone easier if your property is adjacent to the boundary.
Environmental constraints	Yes.	Lack of public sanitary sewer systems.	

Camano Gateway Village (CGV) Zone is applied to the Camano Gateway and Terry's Corner existing areas of mixed use, non-residential or commercial development. This zone permits a range of uses that are limited in scale, intensity and size that provide commercial services to local residents and uses that support local commerce.

Barrier review checklists

Exhibit B1: Moderate Density housing barrier review checklist

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
DEVELOPMENT REGULATIONS			
Unclear development regulations			
Prohibiting some moderate density housing types, such as: Duplexes Triplexes Four/five/six-plexes Townhomes Cottage housing Live-work units Manufactured home parks	No. All these housing types are either permitted or not identified.		Use table could be updated to include the conditions to build some of the unidentified housing types. Some jurisdictions lump together triplex to six-plex with multifamily or townhomes.
High minimum lot sizes	No	Per code, minimum lot size does not apply to individual attached dwelling units.	
Low maximum densities or low maximum FAR	Yes.	The max density is 3 dwelling units per acre. At this density only detached single family homes would be feasible.	Increase density to encourage moderate density housing.
Low maximum building heights	No. For moderate housing types, 2 stories maximum with a max height of 35 feet is feasible and won't limit moderate housing type development.	Duplexes to six-plexes often develop at 1 or 2 stories. Single family, cottages and ADUs often 1 or 2 stories.	
Large setback requirements	No.	10 ft front setback from roads required.	

		10 ft rear and side setbacks	
High off-street parking requirements	No.	1.5 parking spaces per dwelling unit is typical.	If increasing density above 12 du/acre, consider a lower required parking space rate for developments near major transit or with accessory dwellings.
High impervious coverage limits	No.	The max building coverage is 50%, which wouldn't limit moderate density housing types.	
Lack of alignment between building codes and development codes	No.	Building design code 17.03.180 does not inhibit moderate density development.	
Other (for example: complex design standards, tree retention regulations, historic preservation requirements)	Overall, the code requirements for each zone are in a lot of different places and direct links and references are not always provided.	Landscaping, parking, and lot coverage/impervious surface/open space requirements aren't mentioned in the specific zone's section.	

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
PROCESS OBSTACLES			
Conditional use permit process	Not studied as part of this analysis.		
Design review	Not studied as part of this analysis.		
Lack of clear and accessible information about process and fees ¹³⁶	Not studied as part of this analysis.		
Permit fees, impact fees and utility connection fees	Not studied as part of this analysis.		
Processing times and staffing challenges	Not studied as part of this analysis.		
SEPA process	Not studied as part of this analysis.		
LIMITED LAND AVAILABILITY AND ENVIRONMENTAL CONSTRAINTS			
Lack of large parcels for infill development	Yes	Low number of parcels classified as vacant/re-developable.	Consider increasing the boundaries of RAIDs to include more properties or make re-zoning into a mixed-use RAID zone easier if your property is adjacent to the boundary.
Environmental constraints	Yes.	Septic	Discuss potential opportunities to provide creative sewer solutions to expand availability with DOH.

¹³⁶ For example: guidance resources are unclear or difficult to find, no digital permit tracking system, staff do not provide fee estimates or permitting time estimates are unavailable or inaccurate.

Exhibit B2: Low-Rise or Mid-Rise housing barrier review checklist

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
DEVELOPMENT REGULATIONS			
Unclear development regulations Table 17.03.035.C. RAID Uses	<p>Yes.</p> <p>Use table note ****: <i>"In the Camano Gateway Village structures greater than 10,000 square feet are prohibited"</i></p> <p>Use table note 5 regarding mixed-use developments: <i>"Any permitted use that exceeds 8 dwelling units (requires a CUP)"</i></p>	<p>Current Use Table notes for the CGV zone imply that mixed-use developments over 8 du are possible in the CGV zone with a CUP.</p> <p>However, 8 dwelling unit mixed-use developments are unlikely to be built since structures greater than 10,000 square feet are prohibited. Assuming 2 stories, 1100 sf avg unit size, ground-floor commercial, and 25% factor for non-liveable area: 8 dwelling units would require a build pad of at least 11,000 sf, which exceeds the max structure size in the CGV zone.</p>	<p>Consider increasing the structure size limit in the CGV zone or specifying if the structure size limit is only specific to ground floor.</p> <p>Consider aligning CUP requirements with any proposed density changes.</p>
High minimum lot sizes	No	Per code, minimum lot size does not apply to individual attached dwelling units.	
Low maximum densities or low maximum FAR	Yes.	The max density is 3 dwelling units per acre. At this density only detached single family homes would be feasible.	Increase density to encourage low-rise density housing. Ideal density for mixed-use development is 12-24 du/acre (depending on max height).
Low maximum building heights	Yes. The max build height is 2 stories, which limits mixed-use development to only one story of residential. Low-rise buildings are typically 3-6 stories	Required ground floor commercial limits residential portions of mixed-use developments to only one story.	An increase to 3 stories maximum for mixed-use developments would not result in an increase in build height. This will make it easier to build higher density mixed-use and make smaller/encumbered lots more marketable.

			An option can be allowing an increase in stories for mixed-use developments.
Large setback requirements	No.	No front setback from roads required. 10 ft rear and side setbacks are not a huge problem.	Consider specifying any required setbacks from incompatible uses. Consider specifying if the side setback is total or each side.
High off-street parking requirements 17.03.180 Q. Parking, access, and circulation.	No. Mixed-use developments combine residential and commercial parking requirements.	1.5 parking spaces per multi-family dwelling unit is typical.	Consider a lower required parking space rate for studio units. Consider incentivizing bike parking (can also reduce required parking standards near transit).
High impervious coverage limits	Maybe. Depends on desired density	50% max building coverage is limiting for mixed-use developments which typically build on a larger build pad, and some may even provide underground/ground floor parking within the structure. 70% max impervious surface won't inhibit mixed-use development, but if a higher density is proposed, the parking requirements may give reason to increase the impervious surface maximum.	Consider a higher max lot coverage if there is a nearby (quarter mile) recreation facility or park. Consider increasing max lot coverage and max impervious for mixed-use developments proposing underground or structured parking.
Lack of alignment between building and development codes Other (for example: ground floor retail requirements, open space requirements, complex design standards, tree retention regulations, historic preservation requirements)	No.		
PROCESS OBSTACLES			
Conditional use permit process 17.03.035 - Use tables	Yes. Mixed-use developments require a conditional use permit if over 4,000 sf of gross floor area.	This threshold is low. A 2 story building with 2,000 sf ground floor area would meet this and require a CUP. 8 dwelling units is the other threshold for	Consider increasing the CUP requirement for mixed-use developments. If the goal is to have smaller multi-family and mixed-use buildings (build pad)

	<p>Table Note. 5 Any permitted use requiring a Type 2 CUP. 8 dwelling units as part of a mixed-use development would require at least 24,000 sf of gross floor area (assuming ground floor commercial and 1,100 sf per unit).</p> <p>This gross floor area would require a CUP under table note 3, as well as wouldn't even be permitted in the CGV zone use table note ****: "In the Camano Gateway Village structures greater than 10,000 square feet are prohibited"</p> <p>Currently there is no way to build 8 dwelling units as part of a mixed-use development in the CGV zone.</p>	<p>then consider an increase to gross floor area scaling with stories. For example, CUP required if a 2 story building exceeds 12,000 gross floor area scaling up to 18,000 gross floor area for a 3 story building.</p>
Design review	Not studied as part of this analysis.	
Lack of clear and accessible information about process and fees	Not studied as part of this analysis.	

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
Permit fees, impact fees and utility connection fees	Not studied as part of this analysis.		
Process times and staffing challenges	Not studied as part of this analysis.		
SEPA process	Not studied as part of this analysis.		
LIMITED LAND AVAILABILITY AND ENVIRONMENTAL CONSTRAINTS	Yes	There is approximately 15 acres of vacant and re-developable land.	Consider increasing the boundaries of RAIDs to include more properties or make rezoning into a mixed-use RAID zone easier if your property is adjacent to the boundary.
Lack of large parcels for infill development	Yes	Low number of parcels classified as vacant/re-developable.	Consider increasing the boundaries of RAIDs to include more properties or make rezoning into a mixed-use RAID zone easier if your property is adjacent to the boundary.
Environmental constraints	Yes.	Septic	Discuss potential opportunities to provide creative sewer solutions to expand availability with DOH.

The Rural Village (RV) Zone is applied to existing areas of mixed-use or intense non-residential or commercial development and encompasses the logical outer boundary of the existing pattern of mixed-use or non-residential development located on a state highway or county arterial. This zone permits a range of commercial services that are limited in scale, intensity and size that typically serve a localized geographic area. Mixed-use structures are encouraged.

Barrier review checklists

Exhibit B1: Moderate Density housing barrier review checklist

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
DEVELOPMENT REGULATIONS			
Unclear development regulations	Yes, there are unclear standards for the correct densities in RAIDs. There are different densities mentioned in separate sections of the code, mentioning a "base" density, minimum lot size, and max density/rooms.	RV (RAID) zone has a max residential density of "maximum permitted by County Health Department requirements"	Work with County Health department to create standard densities based on County Health Dept criteria and County's land use vision.
Prohibiting some moderate density housing types, such as: Duplexes Triplexes Four/five/six-plexes Townhomes Cottage housing Live-work units Manufactured home parks	No. All these housing types are either permitted or not identified.		Use table could be updated to include the conditions to build some of the unidentified housing types. Some jurisdictions lump together triplex to six-plex with multifamily or townhomes.
High minimum lot sizes	Yes.	Minimum lot size is controlled by health department. 1 acre lot size per housing unit on non-public water and 0.5 acre per unit on public water.	Work with Health Department to find solutions for smaller lots and housing types that use less water (less irrigation, smaller families, newer and more efficient fixtures).
Low maximum densities or low maximum FAR	Yes.	RV (RAID) zone has a max residential density of	Work with County Health department to create

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
		"maximum permitted by County Health Department requirements"	standard densities based on County Health Dept criteria and County's land use vision.
Low maximum building heights	No. For moderate housing types, 2 stories maximum with a max height of 30 feet is feasible and won't limit moderate housing development.	Duplexes to sixplexes often develop at 1 or 2 stories. Single family, cottages and ADUs often 1 or 2 stories.	
Large setback requirements	No.	No front setback from roads required. 10 ft rear and side setbacks are not a huge problem.	
High off-street parking requirements	No.	1.5 parking spaces per dwelling unit is typical.	Consider a lower required parking space rate for developments near major transit or with accessory dwellings.
High impervious coverage limits	No.	70% max lot coverage/impervious surface is generous and won't inhibit single family to 6-plex developments. 50% max lot coverage won't be a problem at the allowed densities. A 9,000 sf 6-plex building (assuming 2 stories, 1500 sf unit ground floor area) would need 18,000 sf to max the lot coverage. (this gross density isn't currently allowed in the RV zone, ~12 du/ac)	

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
Lack of alignment between building codes and development codes	No.	Building design code 17.03.180 does not inhibit moderate density development.	
Other (for example: complex design standards, tree retention regulations, historic preservation requirements)	Overall, the code requirements for each zone are in a lot of different places and direct links and references are not always provided.	Landscaping, parking, and lot coverage/impervious surface/open space requirements aren't mentioned in the specific zone's section.	

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
PROCESS OBSTACLES			
Conditional use permit process	Not studied as part of this analysis.		
Design review	Not studied as part of this analysis.		
Lack of clear and accessible information about process and fees ¹³⁶	Not studied as part of this analysis.		
Permit fees, impact fees and utility connection fees	Not studied as part of this analysis.		
Processing times and staffing challenges	Not studied as part of this analysis.		
SEPA process	Not studied as part of this analysis.		
LIMITED LAND AVAILABILITY AND ENVIRONMENTAL CONSTRAINTS			
Lack of large parcels for infill development	Yes	Low number of parcels classified as vacant/re-developable.	Consider increasing the boundaries of RAIDs to include more properties or make re-zoning into a mixed-use RAID zone easier if your property is adjacent to the boundary.
Environmental constraints	Yes.	Septic	

¹³⁶ For example: guidance resources are unclear or difficult to find, no digital permit tracking system, staff do not provide fee estimates or permitting time estimates are unavailable or inaccurate.

Exhibit B2: Low-Rise or Mid-Rise housing barrier review checklist

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
DEVELOPMENT REGULATIONS			
Unclear development regulations	Yes, there is unclear standards for the correct densities in RAIDs. There are different densities mentioned in separate sections of the code, mentioning a "base" density, minimum lot size, and max density/rooms.	RC (RAID) zone has a max residential density of "maximum permitted by County Health Department requirements".	Work with County Health department to create standard densities based on County Health Dept criteria and County's land use vision.
High minimum lot sizes	Yes.	Minimum lot size is controlled by health department. 1 acre lot size per housing unit on non-public water and 0.5 acre per unit on public water.	Work with Health Department to find solutions for smaller lots and housing types that use less water (less irrigation, smaller families, newer and more efficient fixtures).
Low maximum densities or low maximum FAR	Yes.	RV (RAID) zone has a max residential density of "maximum permitted by County Health Department requirements".	Work with County Health department to create standard densities based on County Health Dept criteria and County's land use vision.
Low maximum building heights	Yes. The max build height is 2 stories, which limits mixed-use development to only one story of residential. Low-rise buildings are typically 3-6 stories	Required ground floor commercial limits residential portions of mixed-use developments to only one story. This restriction will often deter mixed-use development.	An increase to 3 or 4 stories maximum for mixed-use developments may only result in an increase from 30 ft max build height to 35ft or 45 ft. This will make it easier to build to max density and make smaller/encumbered lots more marketable to developers.
			An option can be allowing an increased building height for mixed-use developments to

			allow for an additional floor of residential.
Large setback requirements	No.	No front setback from roads required. 10 ft rear and side setbacks are typical and won't hinder development.	Consider specifying if there are any required setbacks from incompatible uses (adjacent to residential zone/use). Consider specifying if the side setback is total or each side.
High off-street parking requirements 17.03.180 Q. Parking, access, and circulation.	No. Mixed-use developments combine residential and commercial parking requirements.	1.5 parking spaces per multi-family dwelling unit is typical.	Consider a lower required parking space rate for studio units. Consider incentivizing bike parking (can also reduce required parking standards near transit).
High impervious coverage limits	Maybe. Depends on desired density	50% max building coverage is limiting for mixed-use developments which typically build on a larger building pad, and some may even provide underground/ground floor parking within the structure. 70% max impervious surface won't inhibit mixed-use development, but if a higher density is proposed, the parking requirements may give reason to increase the impervious surface maximum.	Consider a higher max lot coverage if there is a nearby (quarter mile) recreation facility or park. Consider increasing max lot coverage and max impervious for mixed-use developments.
Lack of alignment between building and development codes	No.		
Other (for example: ground floor retail requirements, open space requirements, complex design standards, tree retention regulations, historic preservation requirements)	None identified.		

PROCESS OBSTACLES			
Conditional use permit process 17.03.035 - Use tables	<p>Yes. Per table note 3. Mixed-use developments require a conditional use permit if over 4,000 sf of gross floor area. "Any permitted use that exceeds 4,000 square feet gross floor area require a Type II Conditional Use"</p> <p>Table Note. 20: One (1) to eight (8) unites processed as a Type 1 Ministerial Use, nine (9) to twenty (20) units processed as a Type II Conditional Use, twenty-one (21) to forty (40) units processed as a Type III Conditional Use.</p>	<p>This threshold is low. A 2-story building with 2,000 sf ground floor area would meet this and require a CUP. Mixed-use developments are basically required to permit through a CUP under these regulations.</p> <p>Although Table note 20 specifies that one to eight unit developments are processed as a Type 1 permit, as specified above, any mixed-use development above 2 units would require a Type 2 CUP.</p>	Consider an increase to gross floor area scaling with stories. For example, CUP required if a mixed-use 2 story building exceeds 12,000 gross floor area scaling up to 18,000 gross floor area for a 3-story building.
Design review	Not studied as part of this analysis.		
Lack of clear and accessible information about process and fees	Not studied as part of this analysis.		

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
Permit fees, impact fees and utility connection fees	Not studied as part of this analysis.		
Process times and staffing challenges	Not studied as part of this analysis.		
SEPA process	Not studied as part of this analysis.		
LIMITED LAND AVAILABILITY AND ENVIRONMENTAL CONSTRAINTS	Yes	There is approximately 11.3 acres of vacant and re-developable land.	Consider increasing the boundaries of RAIDs to include more properties or make rezoning into a mixed-use RAID zone easier if your property is adjacent to the boundary.
Lack of large parcels for infill development	Yes	Low number of parcels classified as vacant/re-developable.	Consider increasing the boundaries of RAIDs to include more properties or make rezoning into a mixed-use RAID zone easier if your property is adjacent to the boundary.
Environmental constraints	Yes.	Septic	