

2017 Draft CWPP Revisions: Matrix of Proposed Changes 3.0

#	Section	Summary	Revision	Explanation
1	1.3 (5) Definitions: Future Planning Area	Replace reference to ... <i>protecting land which has been identified as having long term rural significance... with terminology more consistent with state law</i>	Proposed: An area immediately outside of, and adjacent to, a Non-Municipal Urban Growth Area. Future Planning Areas are designated by the County to reserve areas which may be necessary for future Urban Growth and to protect land which has been identified as having resource land of long term commercial significance, long term rural significance such as critical areas and <u>land extensively constrained with critical areas</u> , key entrance roads, and areas of historical significance. Broadly, such areas are intended to provide an opportunity for long term planning beyond the normal twenty year planning horizon.	These criteria are now reflected in the JPA designation criteria where they can be considered in boundary decisions early in the planning process. Language change to be more consistent with state law terminology and provide clarity related to the protection of resource lands of long-term commercial significance, provided for in state law and reiterated in 3.3 per WAC 365-196-815(1)(a) .
2	1.3 (6) Definitions: Joint Planning Area	Replace reference to ... <i>protecting land which has been identified as having long term rural significance... with terminology more consistent with state law</i>	Proposed: Joint Planning Area (JPA): Areas immediately outside of, and adjacent to, Municipal Urban Growth Areas. JPAs are jointly designated by the County and Municipalities to reserve areas which may be necessary for future Urban Growth and to protect land which has been identified as having resource land of long term commercial significance, long term rural significance such as critical areas, land <u>extensively constrained with critical areas</u> , key entrance roads, and areas of historical significance.	These criteria are now reflected in the JPA designation criteria where they can be considered in boundary decisions early in the planning process. Language change to be more consistent with state law terminology and provide clarity related to the protection of resource lands of long-term commercial significance, provided for in state law and reiterated in 3.3 per WAC 365-196-815(1)(a)
3	1.3 (10) Definitions: Resource Lands of Long Term Commercial Significance	New definition for Resource Lands of Long Term Rural Significance	Proposed: Resource Lands of Long Term Commercial Significance: <u>Lands zoned Commercial Agriculture CA in accordance with the Island County Zoning Code and RCW 36.70A.170 and RCW 36.70A.050.</u>	Staff is proposing eliminating zoning language as part of the JPA/FPA revisions. Staff is introducing language that aligns with the requirements of In RCW 36.70A.170, RCW 36.70A.050 and WAC 365-196-815(1)(a). The CWPP should inform the Comprehensive Plan which in turn informs development/zoning regulations.
4	2.2 Countywide Planning Goals: Joint City and County Planning	Delete reference to areas of long term rural significance	Proposed: Joint City and County Planning: Decisions regarding Joint Planning Areas, <u>Municipal</u> Urban Growth Areas, areas for future UGA expansions, <u>and JPA Overlay designations and areas of Long Term Rural Significance</u> will be made by the County and Municipalities in a cooperative fashion.	This section establishes a context for cooperative planning. The 2016 language related to the protection of resource lands of long-term commercial significance are provided for in state law and reiterated in 3.3 per WAC 365-196-815(1)(a) .
5	3.2 (1 a-c)	Add JPA Boundary Criteria. Added new	Proposed:	The CWPPs and Interlocal Agreements call for cooperative planning in the JPAs, areas which may be necessary for urban

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	JPA Policies	criteria for establishing Joint Planning Areas	New criteria added to assist in identifying lands for inclusion or exclusion in the JPA/FPA and guidance for drawing boundary lines.	growth and long term planning beyond the normal 20 year planning horizon. This new section provides criteria that would help guide which lands should be included in the JPA/FPA. This will assist in redrawing of the Coupeville JPA in the future if needed, and/or guide other future JPA boundary adjustments. This criterion is consistent with WAC 365-196-310 which identifies areas to be included in UGA expansions.
6	3.2(2a-d) JPA Policies	Revise Overlay Designations (renamed and clarified)	Proposed: Revise overlay designations: Priority Growth Area (PGA) and Auxiliary Growth Area (AGA). Updates language to be more consistent with state terminology and eliminates zoning as the primary consideration in determining JPA designation.	This update revises language to provide clarity and to be more consistent with state terminology relating to resource lands and properties classified as farm and agricultural or forest lands in accordance with RCW 84.34.020(2) and RCW 84.33.035 . This section also provides new language that will be utilized for determining a sequence for inclusion in the UGA in accordance with WAC 365-196-310 and WAC 365-196-815(1)(a) .
7	3.2(2e)	Revise to reflect buffer protection of resource lands of long term commercial significance.	Proposed: When possible, a buffer of land should be provided between the UGB or lands designated as Priority Growth Areas , and lands which have been designated as resource lands of long term commercial significance . assigned a comprehensive plan designation of Commercial Agriculture (CA), Rural Agriculture (RA), or Rural Forest (RF). When such a buffer is established it shall be assigned a designation of LRSAGA . A buffer should not be established if it would result in highly irregular or impractically configured LRSAGA overlay boundaries.	Updated to reflect new designations. In addition, during the 2016 update the land use designations and zoning districts were 'decoupled' so areas in the CWPPs referencing comprehensive plan designations are being edited to reference zoning. Changes made throughout.
8	3.2(2f) JPA Policies	New criteria for moving from AGA to PGA (changing designations)	Proposed: Criteria added for moving from AGA to PGA. Clarifies existing language: <i>Joint Planning Area designations shall not be assigned in such a way that future UGA expansions are completely precluded, forestalled, or rendered impractical; areas must be provided to allow for future UGA expansions.</i> <i>3.2(1e) (adopted)</i>	Provides for multiple factors to be considered when deciding which lands should be included first in the UGA. Provides protection for resource lands and sensitive areas but also provides criteria for moving such lands into priority growth areas when certain criteria are met.
9	3.2 (2g)	New criteria addressing CARAs and flood hazard areas.	Proposed : Lands designated AGA that perform a critical recharging effect on aquifers used for potable water, contain significant flood hazard areas, or provide down slope storm water conveyance for a watershed (or drainage basin) should remain AGA when possible. ⋮	Provides a recommendation that lands that are critical aquifer recharge areas or flood hazard areas should remain AGA when possible. Also allows for consideration of drainage function of land to be considered in the sequencing of lands into the UGA.

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10	3.2 (3)	Revise language to reflect new designations	Proposed: The County shall adopt the LRS-PGA and PGA-AGA designations as Comprehensive Plan overlay designations which will apply in addition to any underlying comprehensive plan or zoning designations.	Updated to reflect new designations.
11	3.2 (4)	New reference to new criteria.	Proposed: The County may adopt a Future Planning Area around the Freeland Non-Municipal Urban Growth Area and assign overlay designations similar to those discussed above <u>in accordance with the criteria provided in Section 3.2.</u>	Intent is to apply new criteria for boundary revisions and designation criteria to apply to the FPA as well.
12	3.2 (6) JPA Polices	Revise language to allow review of JPA boundaries outside of the periodic review cycle.	Proposed: Proposals to modify a UGA or Joint Planning Area may be made by a Municipality or the County. Modifications to JPA plans shall be subject to the procedures and criteria identified above and should generally only be reviewed made during the periodic update cycle mandated by the GMA <u>or sooner if needed to ensure consistency with adopted criteria.</u>	Provides some flexibility for evaluation. In the most recent periodic review – the revisions and updates were voluminous and afforded little opportunity for review of the JPA.
13	3.2.(7-8) JPA Polices	Revise language to reflect new designations and delete reference to development regulations.	Proposed: For lands assigned a designation of Potential Growth Area (PGA) <u>Priority Growth Area (PGA)</u> , the County shall adopt Planning Policies and Development Regulations which limit or restrict development which could interfere with the efficient utilization of such lands for future Urban Development. The County shall also adopt Planning Policies and Development Regulations which provide Municipalities notification of significant development proposals (such as land divisions, site plan approvals, or major transportation projects) within the JPA, and shall provide the affected Municipality with the ability to comment on such proposals.	Staff is proposing eliminating language that directs changes to development regulations as part of the JPA/FPA revisions. The CWPP should inform the interlocal agreements and the comprehensive plan which in-turn are implemented in the development regulations. We are trying to set up a process that is logical and allows for appropriate planning work to occur within the appropriate context.
14	3.3 Urban Growth Areas	Revise to add clarification to reference	References RCW where specific GMA planning goals are provided.	Clarification requested by legal staff.
15	3.3.6 UGAs	Revise language related to UGA expansion or modification	Proposed: If it is determined that an expansion or modification of a UGA is necessary, <u>the UGA boundaries must be evaluated on a county-wide basis, be based on a County population projection that does not exceed the Office of Financial Management (OFM) published ranges, and include an evaluation of the allocation of growth to each Planning Area and UGA.</u>	This was a request from Department of Commerce in evaluating our CWPP during the 2016 update. If a UGA is expanded outside the periodic update cycle the thresholds triggering such a review would suggest significant population growth. (See 3.3.3.) It would seem unlikely that growth at that scale would occur singularly in one UGA without corresponding growth occurring in the county and other jurisdictions. This seems to address WAC 365-196-310

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16	3.3.7 (b-d) UGAs	Revision to reflect new designations and decoupling and to eliminate zoning reference; also rewritten for clarity per Town of Coupeville comments.	<p>Proposed: Lland shall be considered for inclusion within the UGA in the following order:</p> <p>a. Land with a JPA overlay designation of PGA.</p> <p>b. Land within a JPA which has not been assigned a JPA <u>overlay</u> designation <u>except as provided for in 3.3.8</u>; provided such land is not extensively constrained by critical areas or located in a significant flood or tsunami hazard area.</p> <p>c. Land with a JPA overlay designation of <u>LRS-AGA</u> and an <u>underlying County comprehensive plan designation of Rural (R) zoning</u>, which is not extensively constrained by critical areas <u>and</u>; which does not contain significant flood or tsunami hazard areas; <u>or which is not designated as resource land of long term commercial significance</u></p> <p>d. Land with a JPA overlay designation of LRS and a an underlying County comprehensive plan designation of Rural Agriculture (RA) or Rural Forest (RF) which is not extensively constrained by critical areas, and which does not contain significant flood or tsunami hazard areas.</p>	Updated to reflect new designations and adopted changes in the Comprehensive Plan. Removed reference to specific zoning districts. Language change to be more consistent with state law terminology. New language provides a clear sequence for the inclusion of land into the UGA. More closely aligned with WAC 365-196-310 and WAC 365-196-815(1)(a) . Additional revisions and clarity added per recommendations from Town of Coupeville.
17	3.3.8 UGAs	Add “ commercial” when referencing resource lands of long term significance and add reference to flood and tsunami hazard zones	<p>Proposed: Land which is extensively constrained by critical areas, <u>which contain flood or tsunami hazard zones</u>, or which is designated as resource land of long term <u>commercial</u> significance and is identified by a County comprehensive plan designation of “Commercial Agriculture” (CA) zoning, shall <u>should</u> be considered the absolute lowest priority for inclusion within a UGA and shall <u>should</u> only be included within a UGA upon a demonstration of the following:</p>	This language provides further clarification to sequencing of land into the UGA and provides parallel construction with similar language throughout the CWPPs.
18	3.3.8 (d) UGAs	Add requirement for Transfer of Development Right Program under certain circumstances	<p>Proposed: Resource lands of long term commercial significance can be included unless d. <u>A transfer of development rights (TDR) program has been enacted per WAC 365-196-815(1)(a)</u>.</p>	Add reference to state requirement that a transfer of development rights (TDR) program be established if lands of statewide long term rural significance be included in the UGS per WAC 365-196-815(1)(a) .
19	3.4.11(d) Urban Development	Revise and Delete language to eliminate prohibition on urban development in the	<p>Proposed: The County shall <u>continue to work with local jurisdictions to adopt Planning Policies and Development Regulations that will facilitate anticipated urban development, annexation, and the provision of urban services in those areas</u></p>	Revise to address Department of Commerce concern about prohibiting urban development, as this area is identified to be developed in an urban pattern. Discussions need to continue to identify most appropriate zoning for this area.

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		Urban Holding (UGA) areas	designated UH. adopt Planning Policies and Development Regulations which prohibit Urban Development in areas subject to an Urban Holding designation, including land divisions at urban densities and site plan approvals for Urban Development, provided that minor redevelopment, remodeling, and improvements may be permitted in areas designated UH which are characterized by existing Urban Development.	
20	3.5.2 Rural Development	Eliminates prescriptive language which eliminates opportunities for appropriate small scale uses in the rural areas.	Proposed: Allowed land uses in the Rural Areas should primarily be agricultural or low density residential in nature. In order to support the economic and social vitality of existing cities and towns, non-residential, non-agricultural uses in Rural Areas should generally be limited to small scale home businesses and non-residential uses which are compatible with the rural character and which are directly related to, and supportive of, agricultural uses. Small scale recreation and tourist uses may also be appropriate in Rural Areas and higher density housing and certain commercial uses may be permitted in the County's RAIDs. The County shall adopt Planning Policies.	This language is more closely aligned with the intent of the WAC 365-196-425 which defines rural character patterns as those that foster traditional lifestyles, rural based economies, and opportunities to work and live in rural areas.
21	4.3.2(a) Population Projections & Land Capacity Analysis	Add language on what factors will need to be re-evaluated if a mid-cycle review is requested per 3.3.3	Proposed : <ul style="list-style-type: none"> a. <u>When a mid-cycle evaluation is requested, in addition to other relevant data, the following will be re-evaluated to ensure that County population projections and/or allocations are still valid and correct.</u> <ul style="list-style-type: none"> i. <u>Migration factors (including commuter patterns, retirees, and county job growth);</u> ii. <u>Building permits for new construction compared to projected population growth;</u> iii. <u>Growth locations and densities (permit data); and</u> iv. <u>Project impacts, if expansion evaluation is pursuant to 3.3.3 (c) or (d).</u> 	The language identifies minimum criteria for what data is to be updated for mid-cycle review so differences can be evaluated and considered.
22	4.3.7 Population Projections & Land	Add reference to reasonable market factor (per BLA)	Proposed: For each UGA, a land capacity analysis shall be performed to determine if the UGA has sufficient capacity, <u>with reasonable market factors in accordance with procedures provided</u>	This language is a clarification, adding a reference to using a market factor per the BLA methodology.

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	Capacity Analysis		in Appendix A to accommodate the projected growth in population and jobs.	
23	Buildable Lands Analysis (BLA) Methodology Refinements			
24	1. DEFINITIONS Critical Areas	Add definition	Proposed: 1. Critical Areas: Mapped or verified streams, wetlands, lakes, ponds, steep slopes, and geologically hazardous areas, and their maximum associated buffers.	Intended for clarification.
25	1. DEFINITIONS Critical Areas Factor	Add language that indicates that critical areas factor (CF) is specific to each area	Proposed: 2. Critical Area Constraint Factor (CF): A number representing the percentage of RAID or UGA land (specific to each area analyzed) which is presumed to be constrained by critical areas, and therefore less likely to be available for development.	To apply critical areas reduction factors to all areas.
26	1. DEFINITIONS Undevelopable Parcel	Change the term "Undevelopable" to "Low Probability for Development" Add conservation easements to lands considered LPD	Proposed: Undevelopable Parcel (UP) Low Probability for Development (LPD) : Parcels which are not likely to be available for development because they are owned by a charitable organization, institution, or governmental entity. Undevelopable LPD parcels shall be identified based on Assessor's parcel data. Parcels which are tax exempt based on Assessor's parcel data shall be considered undevelopable LPD parcels. Parcels with an easement that restricts future development shall also be considered LPD parcels.	To be more consistent with how the term is defined/applied (add clarity). To recognize that lands with conservation easements restricting future growth should not be included in the capacity calculations.
27	2.(4) ASSUMPTIONS Household Size	Use UGA and planning area specific average household size instead of a county-wide average	Proposed: 4. Household Size (or Persons per Household) : For the 2016 periodic update a An average household size for Island County of 2.36 was employed. This figure was will be used for each area analyzed based on data from the 2010 census data. data. For each subsequent periodic update, the most current census data should be employed.	Removes unnecessary language, including that specifically related to 2016 update (already outdated). Allows for more localized data to be used when calculating persons per household as it varies widely across the county.
28	2.(5) ASSUMPTIONS	Move discount factor	Proposed:	Partially vacant calculation applies to rural areas as well, so

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	Partially Vacant Parcels	table up from UGA section and Revise factor for properties >3.5 times the min lot size	Revise adjustment factor for properties >3.5 times the min lot size from 0 to 15%.	moved from UGA to Assumptions; renamed from a discount factor to adjustment factor for consistency. Vacant properties have a 10% adjustment factor (not all properties will fully develop within the 20 year planning period); partially vacant properties should have a slightly higher adjustment factor than vacant parcels (less likely).
29	2. (6) ASSUMPTIONS Rural Capacity Deficiencies	Add language shifting rural capacity deficiencies into adjacent UGAs.	Proposed: <u>6. Rural Capacity Deficiencies: If there is a capacity deficiency identified in the rural area of any one of the Planning Areas, the allocated population or jobs which are represented by that deficiency will be allocated to the UGA(s) within that Planning Area. If more than one UGA exists within that Planning Area, the population or jobs will be allocated in accordance with the same percentage of allocation used in the Regional Allocation process.</u>	In response to Commerce. To support a rural to urban shift.
30	2 (7) ASSUMPTIONS Seasonal/ Recreational adjustment factor	Add language related to seasonal/recreational units	Proposed: <u>7. Seasonal/Recreational (SR) adjustment factor: Some dwelling units will not be available for residential occupancy, as they are used for short term rentals (e.g. VRBOs), second homes, etc. An SR factor will be based on the most current census data, but may be refined using local data.</u>	It is also important to look not only at the total number of units, but to look at the Available Housing Inventory, to determine housing unit needs. The Census Bureau has a methodology for determining available units that subtracts out seasonal/recreational units, as they are units that are not available to the permanent residential population. This new reference is added in appropriate locations as applicable.
31	2(8) ASSUMPTIONS Vacancy Rate adjustment factor	Add language to incorporate a vacancy rate into the housing capacity calculations	Proposed: <u>8. Vacancy Rate (VR) adjustment factor: A reasonable factor for vacant units will be based on the most current census data, but may be refined using local data.</u>	Incorporated best practice and demography standards by incorporating a vacancy rate. This new reference is added in appropriate locations as applicable.
32	2(9) ASSUMPTIONS Vacant Parcels adjustment factor	Add language to adjust vacant land development potential	Proposed: <u>9. Vacant Parcels (VP) adjustment factor: To account for VPs that will not fully develop to the maximum density allowed over the next planning period, the capacity calculation for VPs will be reduced by a 10% adjustment factor.</u>	Allows vacant properties to have a 10% adjustment factor (not all properties will fully develop within the 20 year planning period). This new reference is added in appropriate locations as applicable.

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33	3. RURAL ANALYSIS STEPS	Revised for consistency	<p>Proposed:</p> <ol style="list-style-type: none"> <li data-bbox="695 228 1352 391">3. For each zoning designation, identify all undevelopable parcels (UP) <u>Low Probability for Development (LPD)</u> based on tax classification. Parcels which are publicly owned or tax exempt (parks, schools, churches etc.) should be considered undevelopable-LPD and excluded from further analysis. <li data-bbox="695 415 1352 675">4. For each zoning designation, calculate the development potential of all vacant parcels (VP). The development potential of vacant parcels is determined by dividing the parcel area required by the minimum lot size allowed in the zone and rounding down. For example, a 17 acre parcel in the Rural zone could be divided into three five acre parcels ($17/5 = 3.4$) and accommodate three dwelling units. <u>Apply the Vacant Parcels (VP) adjustment factor.</u> <li data-bbox="695 699 1352 1057">5. For each zoning designation calculate the development potential of all partially vacant parcels (PVP) by dividing the parcel area by the minimum lot size, rounding down and subtracting one to account for the existing dwelling unit. For example a 17 acre parcel in the Rural zone with an existing home on it could be divided into three five acre parcels and two additional homes could be constructed on the resulting parcels. [$(17/5 = 3.4) - 1 = 2.4$]. <u>Additionally, identify all the parcels that fall within are 2 and 3.5 times the minimum lot size or greater; discount a portion of these based on the sliding scale below provided in Section 2.5.</u> <li data-bbox="695 1081 1352 1373">7. As a final step, add the resulting TDP figures for each zoning designation together to determine the total development potential for areas outside of RAIDs and UGAs. <u>Apply the critical area constraint factor, and the Seasonal/Recreational (SR) and Vacancy Rate (VR) adjustment factors to determine an appropriate amount of land to deduct from the development potential.</u> This step will allow the total build-out<u>net</u> capacity (TNC) of the rural area (excluding RAIDs) to be determined (in number of dwelling units). <li data-bbox="695 1398 1352 1425">8. In order to determine the number of people that can be 	<p>Revise to be consistent with the revisions to definitions and assumptions (see above).</p> <p>Add language to step 7 for a step that was inadvertently left out (same language as used elsewhere in the BLA).</p> <p>Revisions duplicated in other sections (RAID & UGA) for consistency, but not repeated in this table to save paper.</p>

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34	4.1 (2) GENERAL STEPS		<p>accommodated, the dwelling unit totals from steps six or seven can be multiplied by the average household size for Island County, with the Vacancy Rate (VR) adjustment factor applied. The average household size should be determined using the most recent census data available.</p> <p>2. For each zoning designation, identify all undevelopable parcels (UP) <u>Low Probability for Development (LPD)</u> based on tax classification. Parcels which are publicly owned or tax exempt (parks, schools, churches etc.) should be considered undevelopable LPD and excluded from further analysis.</p>	Revised to reflect new terminology.
35	4.2 RAID ANALYSIS STEPS <u>Determining the Capacity of Single Family Residential RAID Zones</u>	Revised for consistency	<p>1. For each residential RAID zoning designation calculate the development potential of all vacant parcels (VP). The development potential of vacant parcels is determined by dividing the parcel area by the minimum lot size allowed in the zone and rounding down. <u>Apply the Vacant Parcels (VP) adjustment factor.</u></p> <p>2. For each residential RAID zoning designation calculate the development potential of all partially vacant parcels (PVP). For purposes of this analysis, a partially vacant parcel is a parcel that is at least two times as large as the minimum lot size allowed by the zone. Calculate the development potential of all partially vacant parcels (PVP) by dividing the parcel area by the minimum lot size allowed in the zone and rounding down and subtracting one in order to account for the existing dwelling unit. <u>Additionally, identify all the parcels that fall within are 2 and 3.5 times the minimum lot size or greater; discount a portion of these based on the sliding scale below provided in Section 2.5.</u></p> <p>3. For each residential RAID zoning designation determine the total development potential (TDP) by adding the results of steps one and two together. Next determine the amount of land needed for public purposes and deduct an appropriate amount of land. Finally, apply the critical area constraint factor, <u>and the Seasonal/Recreational (SR) and Vacancy Rate (VR) adjustment factors and to determine deduct</u> an appropriate amount of land <u>to deduct from the development potential.</u> This step allows the total net capacity (TNC) for each residential RAID zoning</p>	Revised to reflect new considerations provided for in assumptions.

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			<p>designation to be determined (in dwelling units).</p> <p>5. In order to determine the number of people which can be accommodated, the dwelling unit totals from steps three or four can be multiplied by the average household size for Island County, with the Vacancy Rate (VR) adjustment factor applied. The average household size should be determined using the most recent census data available.</p>	
36	4.3 RAID ANALYSIS STEPS 5.3 Multi-Family & Mixed-Use	Add language to point to the MF & Mixed-Use residential process in the UGA section	<p>Proposed:</p> <p>Determining the Capacity of Multi-Family and Mixed-Use Residential RAID Zones 1. See UGA Multi-Family and Mixed-Use Residential instructions.</p>	For clarity without repetition.
37	4.4(5) RAID ANALYSIS STEPS Non-Residential	Add language on how to determine the employment capacity	<p>Proposed:</p> <p>5. In order to determine the number of jobs which can be accommodated in Non-Residential RAID zones, the acreage totals from step four can be multiplied by the average industrial and commercial employment densities.</p>	Add language for a step that was inadvertently left out
38	5. UGA ANALYSIS STEPS (throughout) UGA Capacity – Multi-Family	Adds language to calculate a residential capacity for Mixed-Use areas	<p>Proposed:</p> <p>Add “mixed-use” with multi-family residential methodology (throughout) while keeping the mixed-use commercial calculations the same. Added “Commercial” or “Residential” with applicable mixed-use sections</p>	This was added to account for residential development capacity in mixed-use zones. This was a gap in the analysis which affected some of our UGAs, including Freeland. CWPP 5.3.1 states that “ <i>development since the adoption of the most recent Development Regulations should be used to select the most likely density of expected development to achieve within this potential range.</i> ” If the mixed-use zones in OH do not have residential development, the analysis would not calculate residential capacity in those areas. Also, state law allows for flexibility on this, should the city wish to adjust what pattern it hopes to see in those areas, this could be analyzed; specifically WAC 365-196-310(4)(b)(ii)(E) states that “ <i>If past development patterns have not resulted in urban densities, or have not resulted in a pattern of desired development, counties and cities should use assumptions aligned with desired future development patterns.</i> ”

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39	5.2 UGA ANALYSIS STEPS <u>Determining the Capacity of Single Family Residential RAID Zones</u>	Revised for consistency	Proposed: <ol style="list-style-type: none"> 1. For each single-family zoning designation calculate the development potential of all vacant parcels (VP). The development potential of vacant parcels is determined by dividing the parcel area by the minimum lot size allowed in the zone, and rounding down, <u>and applying the Vacant Parcels (VP) adjustment factor</u>. When Planning Policies or Development Regulations specify both a minimum and maximum density, both should be calculated to produce a range. Developments since the adoption of the most recent Development Regulations should be used to select the most likely density for expected development to achieve within this potential range. 5. In order to determine the number of people that can be accommodated in the UGA's single-family zones the dwelling unit totals from steps three or four can be multiplied by the average household size for Island County and the <u>Seasonal/Recreation and Vacancy Rate (VR) adjustment factors applied</u>. The average household size should be determined using the most recent census data available. 	Revised to reflect new considerations provided for in assumptions.