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PLANNING & COMMUNITY DEVELOPMENT**

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**TO: Island County Planning & Community Development**  
**FROM: Morgan Shook and Erik Rundell, ECONorthwest**  
**DATE: May 23, 2018**  
**SUBJECT: GMA Reasonable Measures Addendum**

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## BACKGROUND

The Growth Management Act (GMA) is intended to encourage development in urban areas and reduce the inappropriate conversion of undeveloped land into low-density sprawl. To achieve these goals, cities must strive for efficient land use patterns by implementing strategies to realize increased development densities within their designated urban growth areas (UGAs).

To implement this goal, GMA counties and cities are required to collect data on buildable lands and analyze how planning goals are being achieved. As part of this process, jurisdictions are required to monitor the amount and density of development that has occurred since adoption or revision of their comprehensive plan. Jurisdictions must then compare anticipated growth against actual development over time to see if (1) local governments have enough suitable land inside the UGA to accommodate the growth anticipated during the 20-year planning period, and (2) if urban densities are being achieved in UGAs.

Under RCW 36.70A.215 counties and cities are required to identify reasonable measures, other than adjusting urban growth areas that will be taken to accommodate any potential deficiency in buildable land capacity before considering expansion of a UGA. Reasonable measures are actions intended to reduce deficiencies in the development assumptions and targets contained in the countywide planning policies and the county and city comprehensive plans. These measures work to increase densities and realize efficient land use patterns within UGAs.

This memorandum is intended to serve as a resource for pursuing the reasonable measures that will help local jurisdictions achieve the planning targets and development assumptions adopted in their respective comprehensive plans. Ultimately, each jurisdiction will have to decide what measures work best for their community. This document just provides guidance to help communities begin these conversations.

## POTENTIAL REASONABLE MEASURES

There are a variety of measures individual jurisdictions can implement to realize more housing within their existing city limits and UGA. The section below provides a sample range of measures a jurisdiction can choose to pursue. This list is not an exhaustive list of measures available, but those identified as relevant for Island County. Each measure provides a specific description and highlights the potential benefits and challenges associated with that measure.

### Increase allowable residential densities

**Description.** Changes to existing residential development regulations to allow higher densities can allow more units to be accommodated within existing residential zones. For example, a zone that has a minimum lot size of 7,500 square feet could be reduced to 6,000 square feet.

**Benefits.** More units can be built on existing lots without rezoning areas of the city. Slight density changes can be made without disrupting the character of a neighborhood, but allow for significantly more housing.

**Challenges.** Even modest changes may be politically unpopular. Off-street parking requirements may make the development of these sites a challenge based on lot sizes. Increased density maximums may not always result in the increased density of development when zones allow a variety of densities. Additional incentives/regulations might be necessary to realize these higher densities.

### Rezone areas to allow more residential development

**Description.** Changing current low-density residential zones to one that allows a higher density of housing or changing commercial zones to allow a mixture of residential and commercial uses would allow for more units to be built within the zone. For example, portions of a low-density residential area could be rezoned to a medium density residential area.

**Benefits.** More units can be built on existing lots. A wider variety of units can be built that meet the housing needs of residents.

**Challenges.** Zoning changes may be politically unpopular. Zone changes may also require administrative processes, such as an environmental impact statement under the State Environmental Policy Act (SEPA) and potential changes to a jurisdiction's comprehensive plan.

### Allow accessory dwelling units and backyard cottage housing and remove barriers to utilization of this option where possible.

**Description.** Small accessory units on parcels that already have a house may be able provide an additional dwelling unit without significant disruption to the neighborhood character. Units can be attached or detached from the main house. Examples of regulatory barriers may include restrictions that limit the number of accessory units

allowed in a given year, off-street parking requirements, and owner occupancy requirements.

**Benefits.** This can increase the number of residential units, particularly rental units, in single-family or low-density residential zoned areas, likely with minimal changes to the neighborhood character.

**Challenges.** ADUs often require that existing property owners build the structure. As a result, the development process can be a barrier for those that are inexperienced in the process. Construction costs, including development fees, and financing can also be a challenge for property owners with limited funds. Some neighborhoods may have concerns over an influx of additional rental units.

### Provide development incentives

**Description.** Financial incentives can increase revenues or reduce costs for new developments, making projects financially feasible that may otherwise not be feasible under current market conditions. Some examples of potential incentives could include an 8-year multifamily tax exemption program (MFTE) for incorporated areas with a population above 15,000<sup>1</sup> or unincorporated UGAs with sewer service<sup>2</sup>, or density bonuses for certain development types, such as clustered housing or planned residential developments.

**Benefits.** More units may be built sooner than current market conditions allow, particularly the development of more multifamily housing.

**Challenges.** Market conditions are always changing, and incentives offered may not be sufficient as conditions change. Incentives for development may also be politically unpopular.

### Allow more townhomes, and duplexes in low-density residential zones

**Description.** Cities can change regulations to allow different types of housing and scales, particularly in zones reserved for single-family detached housing. This emphasis is on “missing middle” housing options (i.e. duplexes through fourplexes, accessory dwelling units, townhouses, and cottage housing) that are more compatible with lower density residential areas and allow more units to be built.

**Benefits.** A wider variety of units can be built that meet the housing needs of residents while still maintaining a similar, albeit not identical, neighborhood character. In addition, these housing forms are more compatible with lower density residential areas.

**Challenges.** Even modest changes may be politically unpopular. Off-street parking requirements may make the development of these sites a challenge based on lot sizes.

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<sup>1</sup> RCW 84.14.010

<sup>2</sup> RCW 84.14.040

## Allow manufactured home parks in residential areas

**Description.** Manufactured home parks provide additional housing options within residential areas and a more efficient use of land than siting individual manufactured homes on separate parcels. Jurisdictions can ensure that manufactured home parks are a permitted use in residential zones, and they would still be subject to the same development standards as other housing types within the zone. Other regulatory barriers may include limitations on the minimum lot area.

**Benefits.** Manufactured home parks can allow for a more efficient layout of homes and maximize the development density within an existing residential zone.

**Challenges.** The placement of new manufactured home parks within existing residential areas may be politically unpopular.

## Establish residential density minimums

**Description.** Minimum densities place a regulatory floor on the density of units within a zone. This is often implemented through establishing maximum lot sizes or a minimum number of units per acre.

**Benefits.** Prevents low-density development in areas that allow more units and promotes development that is consistent with assumptions in a jurisdiction's comprehensive plan. Low density development can also significantly hinder high density build-out in the future because redevelopment is always more expensive.

**Challenges.** If the minimum densities are set too high and there is no demand, or not as much demand, for units above the minimum density requirements, a jurisdiction may realize less new housing development in those zones. Regulations would limit some property owners from developing their property as they desire.

## Reduced street-width standards

**Description.** Current standards or subdivision ordinances may require street widths that are wider than necessary to accommodate traffic and/or parking needs. Narrowing the minimum street-width standards would allow more land area to be used for housing as part of the subdivision process.

**Benefits.** Increasing the amount of land available for development could lead to more housing on the additional land. Reducing the size of a street could also reduce the cost for a developer and make development more financially feasible. There is the added benefit of creating more walkable neighborhoods when street-widths are lower, which can encourage additional growth in that neighborhood.

**Challenges.** Other city departments may resist the changes. Street standards are often based on national traffic engineering standards, which are applied by public works engineers. Fire departments may also desire wider streets for their larger vehicles.

## Joint Planning and Pre-Annexation Agreements

**Description.** Coordinated planning between the County and affected city for infrastructure and service provisions and development standards in unincorporated

UGAs can facilitate the efficient development of these areas at urban densities and form. Ultimately, cities should ensure an adequate and orderly process exists that will allow areas to annex into the city.

**Benefits.** Successful coordination of development and annexation of unincorporated areas within UGAs can lead to those areas developing sooner and at overall higher densities, increasing the total number of housing units built. Pre-annexation plans can also reduce costs for infrastructure and service provision.

**Challenges.** Pre-annexation plans between the County and the affected city can take time and extensive negotiation.

### State Environmental Policy Act categorical exemptions

**Description.** Under the State Environmental Policy Act (SEPA), cities and counties can establish a minimum threshold for environmental review up to the maximum allowed under state statute<sup>3</sup> for new construction. Projects below this threshold are exempt from the EIS determination requirements. In addition, cities and counties can adopt a planned action ordinance, which require conducting an environmental impact statement (EIS) for a defined subarea in advance of future development. Subsequent individual developments within this area at or below the type and scale of development analyzed in the EIS are exempt from environmental review.

**Benefits.** Reducing the amount of environmental review required can reduce review time and cost for developments below those thresholds, which may result in more development than would have occurred otherwise.

**Challenges.** Community members interested in environmental protection may be hesitant to lessen environmental review requirements.

### Allow for Planned Residential Development in Single-Family zones

**Description.** Planned Residential Developments (PRDs) are those that follow a design plan from inception to use. This can allow for the more creative site plans, and some jurisdictions allow increased densities through a PRD as a tradeoff for increased design requirements, the preservation of open space through clustering, and the provision of public amenities.

**Benefits.** Planned Residential Development can help maximize the development density within a low-density residential zone while complementing the neighborhood character through design requirements and while making use of onsite amenities including open space. This can be particularly useful for properties constrained by critical areas, which can make use of clustering units within the unconstrained portion of the property.

**Challenges.** Changes to allowed density within single-family zones can cause concerns related to neighborhood character.

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<sup>3</sup> WAC 197-11-800

## Short Plat process

**Description.** Increase the number of lots that can be platted under the shot plat process. Current state law allows up to nine lots to be subdivided through a shot plat process, but many jurisdictions choose to have a lower standard for triggering a long plat review (ex. four lots as the maximum reviewed as a short plat). Because the short plat process is generally less complicated and costly than a long plat, this can encourage the creation of more lots.

**Benefits.** Short plats tend to be significantly less expensive and quicker to permit, which could encourage the development of more projects at higher densities.

**Challenges.** No major challenges.

## Parking standards

**Description.** Jurisdictions typically require dedicated off-street parking spots for new development based on the size and use of the building. These requirements increase the amount of land needed to accommodate parking and can be a barrier to new development. For example, off-street parking requirements for single-family homes, townhomes, or apartments may require larger lot sizes to accommodate the building, parking, and open space and prevent development from meeting the densities allowed under the current zoning. Additional parking also increases the costs for development.

**Benefits.** Reducing parking standards gives developers more flexibility when developing a property and prevents parking from being the factor governing development densities on a site (compared to the actual zoning requirements). Reducing parking standards also reduces the cost of development. This can be particularly effective around transit corridors and services.

**Challenges.** Changes to off-street parking standards can be politically unpopular. When not done effectively, reduction in off-street parking standards can lead to neighborhoods overwhelmed by cars and a lack of parking.

## Land assembly and acquisition

**Description.** Finding appropriately zoned sites large enough for development, particularly for multifamily housing, can be difficult. Jurisdictions can proactively purchase property to assemble lots large enough for housing to be developed more efficiently and at densities allowed under current zoning. The assembled properties can then be sold for development and to achieve other public benefits, such as affordable housing. Incentives can also be provided through a competitive process that would encourage proposals for high-density housing.

**Benefits.** Proactively assembling property can facilitate the development of these sites with residential uses more efficiently and at higher densities. Jurisdictions often assemble property for the specific purpose of supporting affordable housing development. Creating pilot public/private projects can also stimulate development in targeted areas.

**Challenges.** Assembling adjacent properties can take time, is expensive, and is usually a long-term strategy. It also requires local jurisdictions to allocate public dollars that could be used for other near-term priorities.

### **Provide for more flexibility from requirements for ground floor commercial**

**Description.** Ground floor commercial requirements make residential buildings more costly to build, and depending on market conditions, may be a barrier to multifamily development in zones with those requirements. In addition, the commercial spaces built may be difficult to fill, which also is an economic disincentive. Relaxing ground floor commercial requirements, either through limiting the amount required or allowing residential uses on the ground floor, could help make multifamily housing development more financially viable. When allowing residential uses on the ground floor, certain building standards could remain in place to allow the units to more readily convert to a commercial use in the future.

**Benefits:** More multifamily units may be built sooner than if the requirements are maintained.

**Challenges.** Ground floor commercial requirements are often intended to further jurisdiction's goals of fostering mixed use, walkable neighborhoods. Removing these requirements may preclude opportunities for future mixed-use development on those sites.

## **CONSIDERATIONS**

Reasonable measures are adopted and implemented through local comprehensive plans and local development regulations. Most jurisdictions will have to adopt more than one measure to achieve its target population and/or achieved density goals. The specific measure or combination of measures pursued will depend on each jurisdiction's local needs.

In selecting measures to pursue, local jurisdictions should first consider what specific issue they are trying to address. For example, is a wider variety of housing needed citywide or does residential density within low-density zones need to be increased? The ultimate objective(s) will inform the appropriate measures to implement. As a part of selecting measures, local jurisdictions should also evaluate and analyze the potential for different measures to increase housing capacity or densities.

Lastly, local jurisdictions will need to continually monitor development outcomes after reasonable measures have been implemented to ensure they are having the intended effect. Adjustments to regulatory measures used may be needed to ensure they are functioning as effectively as possible.