



Planning and Community Development

Ryan Countryman

Council Initiated:

☒ Yes

☐ No

ECAFs: 2023-1435

2023-1436

2023-1437

2023-1438

Motions: 23-539

23-540

23-541

23-542

Type:

☐ Contract

☐ Board Appt.

☒ Code Amendment

☐ Budget Action

☐ Other

Requested

Handling:

☒ Normal

☐ Expedite

☐ Urgent

Fund Source:

☐ General Fund

☐ Other

☒ N/A

Executive Rec:

☐ Approve

☐ Do Not Approve

☒ N/A

Approved as to

Form:

☐ Yes

☐ No

☒ N/A

Subject: Four motions to refer code amendments related to housing to the Planning Commission for review and recommendation.

Scope: Each motion would refer a different ordinance for review a recommendation from the Planning Commission.

- Motion 23-539 (Ordinance 1) would transmit changes related to **attached single-family** housing that would add a new Section 30.23.270 and amend SCC 30.91D.515
- Motion 23-540 (Ordinance 2) would transmit changes to reduce **minimum lot size requirements** in Low Density Multiple Residential (LDMR) and Multiple Residential (MR) zoning, amending SCC 30.24.032
- Motion 23-541 (Ordinance 3) would transmit changes to allow more flexibility regarding **location of parking**, amending SCC 30.26.020
- Motion 23-542 (Ordinance 4) would transmit changes related to **Lot Size Averaging**, amending SCC 30.23.210 and 30.41B.200 and adding a new section SCC 30.23.215

Duration: Recommendation(s) requested by May 7, 2024.

Fiscal Impact: ☐ Current Year ☐ Multi-Year ☒ N/A

These motions would have no direct fiscal impacts. If adopted, the ordinances attached to the motions could cause minor changes permitting revenues in Fund 193.

Authority Granted: None

Background: All four ordinances reflect ideas raised during the “Opening Doors to Home Ownership” housing panel discussions sponsored by County Councilmember Nate Nehring from January 17, 2023, to April 18, 2023. Each motions would each refer a different proposed ordinance to Planning and Development Services (PDS) and the Planning Commission for review and recommendation back to the County Council. [SCC 30.73.040](#) provides that the Planning Commission shall hold a public hearing on a proposal referred to it by the County Council within 90 days or in a time specified by the County Council. To provide flexibility in scheduling a briefings and hearings, the motions request recommendation back to the County Council by May 7, 2024.

The proposed ordinances would increase home ownership options. Current regulations limit some layouts of development to condominium ownership. Each ordinance would address a different requirement that prevents ownership by subdivision. For example, Ordinance 1 would allow subdivision of most duplexes to sell each half on its own lot where sale of these same duplex units can currently only be as condominiums. There is no policy basis for limiting ownership options for the affected housing configurations. Instead, the reasons that certain types of housing are ineligible for subdivision is that past code updates that did make allowance for these designs. Increasing options to subdivide property may also help increase housing production and affordability by better aligning codes with financing models. See analysis is Appendix A for details.

Request: Move the four motions to GLS on December 13, 2023, for consideration.

Appendix A: Analysis

Overview:

Purpose. Each proposed ordinance would increase options to develop ownership housing in a more affordable manner. If adopted, applicants could use proposed ordinances – alone or in combination – to develop and subdivide housing in configurations that Snohomish County Code currently limits to sale as condominiums.

Ordinance 1 would allow subdivision of duplexes as attached single family dwellings by adding a new section 30.23.270 to Snohomish County Code (SCC). It also amends SCC 30.91D.515 to clarify that subdivision of attached single family dwellings may include existing duplexes.

Ordinance 2 would reduce minimum lots sizes in Low Density Multiple Residential (LDMR) and Multiple Residential (MR) zoning by amending SCC 30.24.032. These changes would allow the same number of lots as Single Family Detached Unit (SFDU) condominiums currently allow for units in these zones. The reason that subdivisions cannot achieve the same number of lots as SFDU units is that both zones currently require a standard minimum lot size of 7,200 square feet but LDMR allows one unit for every 4,000 square feet and MR one for every 2,000 square feet.

Ordinance 3 would allow cottage-style parking arrangements by amending SCC 30.26.020 to increase flexibility regarding location of parking. This section currently requires parking that serves a subdivision to be on the same lot as the housing. Since SFDUs are a single development site, the parking can be in shared facilities further from the homes. Some city codes also allow for cottage-style parking to serve subdivided lots.

Ordinance 4 (Motion 23-542) would make several changes related to lot size averaging provisions in SCC 30.23.210. The most significant change is a proposed reduction to the minimum lot width, going from a 40-foot minimum width to a 34-foot minimum width. This would allow configurations with narrower lots that match the equivalent to lot width sometimes found in SFDU developments and actual lot widths in Planned Residential Developments. Other changes to LSA provisions are discussed in the section for Ordinance 4.

Secondary and cumulative effects. Besides allowing more options for ownership structure, each of the four proposed ordinances would allow slightly higher residential densities in urban areas. The ordinances would also increase tree canopy coverage of new development because existing tree canopy requirements are higher for lots created by subdivision than they are for units approved under processes other than subdivision (see tree canopy requirements in [SCC 30.25.016](#), which would remain unchanged). The analysis sections for individual ordinances below describe additional secondary effects unique to that ordinance.

Ordinance 1: Attached Single Family.

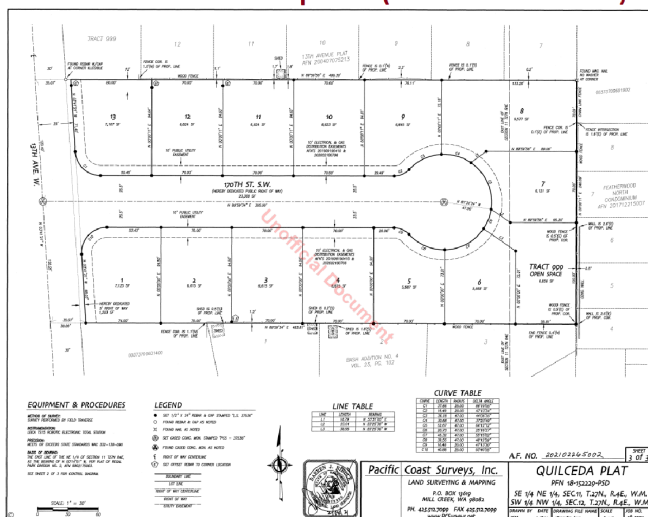
County code allows duplexes on most lots in urban areas, but current code provisions prevent subdivision of many of the allowed duplex configurations. Instead, sale of duplex halves requires converting the units to condominiums first. SCC 30.91D.515 defines a duplex where each half has its own lot as being two “attached single family dwellings”.

This proposal would allow subdivision of attached single family dwellings at the same density as currently allowed for subdivisions where each lot has a duplex. The main changes are in the proposed new section SCC 30.23.270. This section considers each building with two attached single-family dwellings as one building site and then allowing building sites with two units to have two lots. Other provisions in SCC 30.23.270 would mirror advantages often provided by other code sections such as the 55% lot coverage allowed for single family detached and duplex homes in subdivisions using lot size averaging. Developments using SCC 30.23.270 could mix detached and attached homes.

Use of Ordinance 1 instead of current codes could result in some minor design differences for some configurations of attached single family units. The following two examples illustrate these.

Example 1A. Duplexes built on the maximum number of lots. Quilceda Plat (Permit File Number [PFN] 2018-152235 SPA) subdivided its site into the maximum number of lots (13) allowed for the property size and zoning using lot size averaging provisions. The developer put a duplex on each lot, for a total of 26 units. Since the subdivision reached the maximum number of lots, sale of individual units required the additional step of recording the entire development as Quilceda Estates Condominium to sell the units.

Quilceda Plat 13 lots (maximum lots allowed) Each lot has a duplex (26 total units)



Effect of Ordinance 1: The two condominium units in the 2nd Drive Condominium could have become two lots under the proposed code using the proposed a new section SCC 30.23.270.

Design Differences: Building permits for individual duplexes do not need to provide frontage improvements (road widening and sidewalks) or to show tree canopy for approval. Subdivisions must meet current frontage standards and provide tree canopy. Permitting for the 2nd Drive Condo was on an existing lot that pre-dated current frontage standards and tree canopy requirements. Recording it as a condominium did not require frontage improvements or tree planting. Under the proposed code allowing subdivision, existing provisions requiring frontage improvements and tree canopy would apply. These design differences would apply to both when configuring an existing duplex as two attached dwelling units and for new permits for a two unit building and concurrent subdivision.

Frontage requirements originate in state subdivision requirements in Chapter 58.17 RCW that require “safe walking conditions for students”. Subdivision of duplexes on older lots without frontage improvements may thus be contingent on adding frontage improvements that would not be a requirement if the sale of units was as a condos.

Existing tree canopy codes do not require duplexes on pre-existing lots to provide tree canopy. However, 2-lot short subdivisions must provide 20% tree canopy per [SCC Table 30.25.016\(3\)](#). The 20% tree canopy may involve preservation of existing trees or planting of new trees projected to meet the coverage requirement in 20 years. Buildings permitted as duplexes on lots that pre-date tree canopy requirements could record as condos without planting new trees, but subdivision of existing duplexes that lack current trees may require planting of trees as a condition of approval.

Ordinance 1 would amend the definition of attached single family dwelling in SCC 30.91D.515 by changing the word “developed” to “configured” to clarify that existing duplexes can be subdivided into an attached single-family configuration.

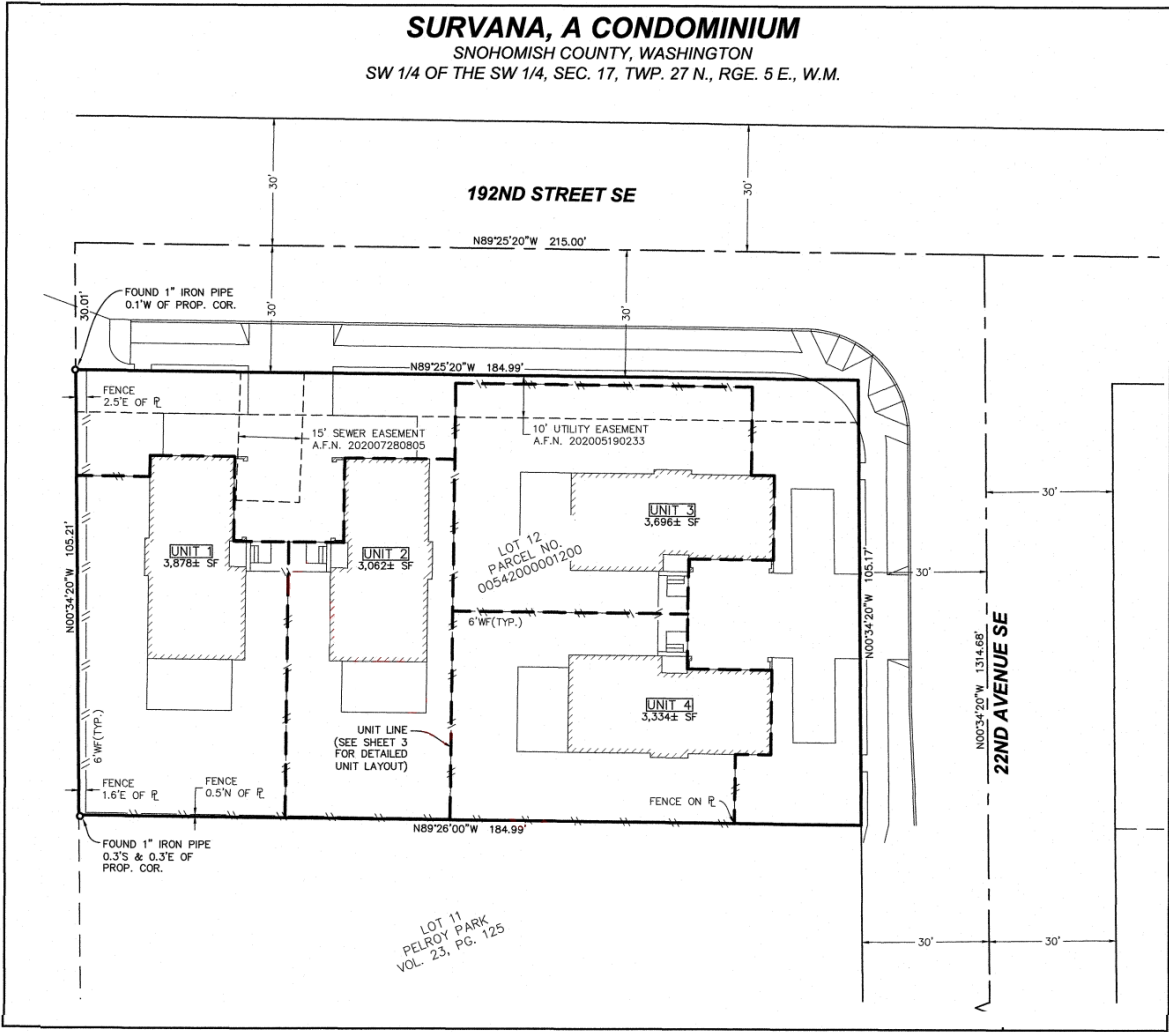
Ordinance 2: Reducing Minimum Lot Size Requirements in LDMR and MR zoning.

[SCC 30.21.025\(1\)\(b\)](#) classifies both LDMR and MR zoning as “multiple family residential” zones. This classification does not mean that housing must be in attached multiple family configurations. Instead, it is common for development in these zones to result in single family detached housing. However, development of such housing is generally as “Single Family Detached Units” (SFDUs) under [Chapter 30.41F SCC](#) which specifically prohibits subdivision at [SCC 30.41F.010\(1\)](#). Even before adoption of Chapter 30.41F in 2007, detached unit developments in LDMR and MR could have a unit count that exceeds what was possible through a subdivision process. This was because both zones had minimum lot size requirements of 7,200 square feet for new lots. LDMR allows a base density of one unit per 4,000 square feet and MR allows a base of one unit per 2,000 square feet.

Ordinance 2 would amend SCC 30.23.032 to reduce the minimum lot size requirements in LDMR and MR zoning to 4,000 square feet and 2,000 square feet, respectively. This would enable subdivision of single family detached dwellings at current SFDU densities through lot size averaging provisions in [SCC 30.23.210](#) or with the attached single-family provisions that Ordinance 1 is proposing to be at SCC 30.23.270.

Use of Ordinance 2 instead of current codes could result in some minor design differences for some configurations of detached and attached single family units. The following two examples illustrate these.

Configuration 2A: Single Family Detached Units, maximizing density. Survana Condominiums (PFN 2017-107039 SPA) consists of four single family detached units on a 19,166 square foot site. Development followed the Single Family Detached Unit (SFDU) process in [Chapter 30.41F SCC](#). Survana Condominiums achieves the maximum base density allowed in the applicable zoning of LDMR. While configured much like a subdivision, the SFDU process and other requirements currently make this configuration ineligible for subdivision and fee-simple ownership.



Effect of Ordinance 2: The minimum lot size reduction in LDMR would enable a site like Survana Condominium to subdivide into four lots to match the unit count. This would not be an exact match since the lot lines would likely be in different locations than the unit lines in the condo such that the common element for driveway and landscaping in the condo would become parts of the lots instead.

Subdivisions using the proposed lot sizes in LDMR and MR zoning could use Lot Size Averaging (LSA) provisions in [SCC 30.23.210](#) because SCC 30.23.210(5) uses the minimum lot area requirement (in SCC 30.23.032) to determine the maximum number of lots. The current 7,200 square foot minimum lot area in SCC 30.23.032 means that far more units are approvable through the SFDU condominium process on a typical site. The proposed changes to the minimum lot area in SCC 30.23.032 would change this math by enabling the same number of lots under SCC 30.23.210(5) as can result from using the SFDU provisions in Chapter 30.41F.²

Design Differences. Tree canopy and parking are two areas identified as having minor design differences between SFDU and subdivision requirements.

Tree canopy requirements in Table 30.25.016(3) SCC based on the type of development and number of lots/units. Since Survana Condominiums is a 4-unit SFDU, the Table 30.25.016(3) required a 15% tree canopy. If Survana was a 4-lot short subdivision as would be possible combining the proposed amendments to lot sizes in SCC 30.23.032 with existing the lot size averaging provisions in SCC 30.23.210, then the tree canopy requirement would have been 25%.

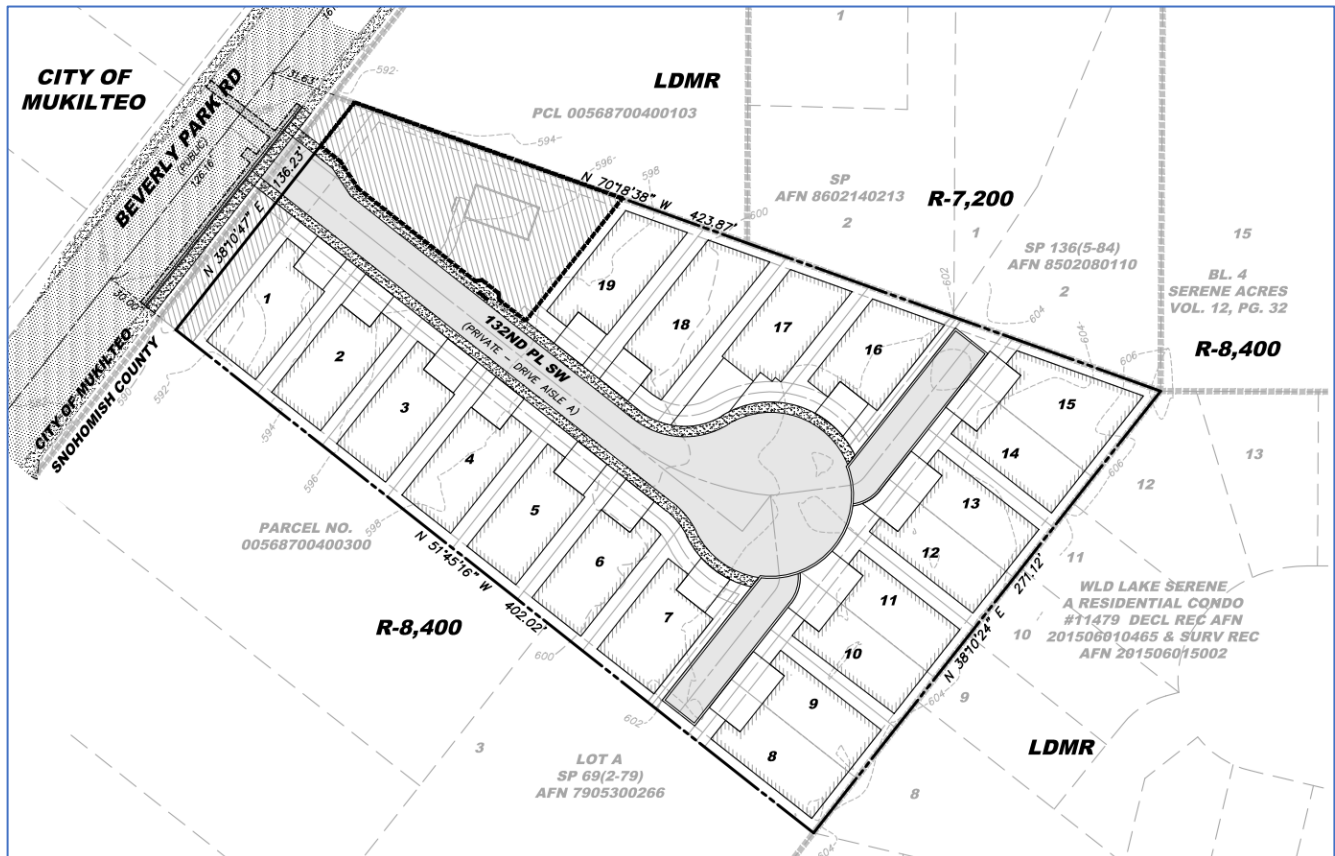
Parking differs between SFDU development and subdivisions in two ways. First, is the number of spaces required by [SCC 30.26.030](#). This section requires:

- Two spaces per single family dwelling in a subdivision (plus driveway dimensions that can accommodate at least one more vehicle)
- Two spaces per dwelling unit in an SFDU, plus guest parking at one space per four units (in part to address that driveways can be too short to park on)

Single-family buildings in subdivisions thus have lower mandated parking than identical buildings in an SFDU. SFDUs can have guest parking that serves a neighborhood rather than individual houses via room on the driveway.

² By combining proposed revisions to SCC 30.23.032 and the proposed new section SCC 30.23.270, an applicant could, in theory, achieve twice as many attached single-family units as detached units under present-day regulations. Such lots could be as small as 1,500 square feet. Although this hypothetical combination may result in some projects with higher overall densities than what code currently allows, the seeming potential to double densities is not likely to be fully achievable. This is because in most cases these higher potential densities would require physically attaching homes in townhouse or multi-family configurations. It would be more realistic to anticipate a modest overall density increase but not one that would have significant impacts under [Chapter 43.21C RCW](#).

Example 2B: Mixing Single Family Attached and Detached Units. Harbour Cove SFDU (2021-108751 SPA) consists of 19 total units (11 detached and 8 attached). The gross site area is 81,878 square feet (1.88 acres). Under current codes, LDMR zoning would have allowed a maximum of 20 units but only 11 lots. This project recorded as condominiums after receiving approval as an SFDU.



Effect of Combining Ordinances 1 & 2: The change in minimum lots size proposed Ordinance 2 (going to 4,000 square feet in LDMR zoning) would enable a subdivision with the same number of lots as the base density would have allowed (i.e., up to 20 lots). Since the detached condo unit have sizes ranging from 3,120 to 3,812 square feet, this part of the development would have needed to also rely on the existing use Lot Size Averaging (LSA) provisions in [SCC 30.23.210](#). This allows lots to be as small as 3,000 square feet. However, since the size of individual duplex condo units ranges from 2,366 square feet to 3,080 square feet, some of these units would still need to record as condos if this had been an LSA subdivision solely using Ordinance 2. If both Ordinance 1 and Ordinance 2 were to pass, then code would consider these duplex units as single-family attached units under the new section SCC 30.23.270 in Ordinance 1. This would allow all of condo unit areas would comply with the proposed minimum lot size of 1,500 square feet for lots under that section.

Design Differences: Tree canopy, and road network elements would have having minor design differences between SFDU and subdivision requirements. Although parking requirements are different between SFDUs and subdivisions, the actual design would have complied with both.

The canopy requirement as an SFDU was 20% but if Harbour Cove had been a subdivision, it would have been 30% under Table 30.25.016(3).

Changing from an SFDU to a subdivision would have resulted in at least two minor changes to road network elements. First, as an SFDU, the light gray areas in the preceding figure were all considered to be part of a “drive aisle”. The pavement on the main part of the drive aisle is 20 feet wide (which is the minimum allowed for drive aisles that are also fire lanes). [SCC 30.24.040 and .050](#) allow drive aisles in SFDU development, but not in subdivisions. Therefore, if Harbor Cove had been a subdivision, the main drive aisle would have been a public or private road which both require 24 feet of pavement width (EDDS SD 3-065).

The second road network change involves access to units 8-10 and 12-15 which take access from secondary parts of the drive aisle. These secondary drive aisles are also 20 feet wide and would need widening to 24 feet as private roads. They could also be shared driveways with width reduced to 10 feet if the attached units remained as duplexes. However, developing units 8-15 as attached single family per Ordinance 1 and with shared driveways may create a conflict with the “two lot” part of how code defines a shared driveway. Under [SCC 30.91D.465](#), a shared driveway means:

a road network element that provides a single vehicle and pedestrian access in a private tract or easement for **two lots** that have no more than two dwelling units or two Group U [non-residential outbuildings] occupancies per lot. (**emphasis** added)

Per EDDS 3-05.D.3:

A shared driveway that provides access to no more than two dwelling units or two Group U occupancies may have a minimum 10-foot wide driving surface and easement width. More intensive use will require that the shared driveway meet fire lane [i.e. minimum 20-foot width] standards.”

Ordinance 3: Location of Parking Spaces.

Ordinance 3 would allow subdivisions to have offsite parking in a manner matching some SFDU and local city development. Current phrasing in SCC 30.26.020(1) creates a subtle difference in the location of parking in subdivisions vs SFDU development. This subsection requires that “Parking for single family and multifamily dwellings shall be within 300 feet of and on the same lot or building site with the building it serves.” For subdivisions, all parking must be on the lot it serves. Most subdivisions meet this requirement by including a two-car garage as part of each single-family structure or a two-car garage for each duplex unit. Street parking cannot satisfy the requirement to provide two off-street parking spaces. SFDUs do not create new lots; instead, the development is one building site. This means that the parking only needs to be within 300 feet of the building site. Like a subdivision, most SFDUs provide the required two parking spaces per unit in a garage attached to the unit.

Ordinance 3 would amend SCC 30.26.020(1) as shown to allow subdivisions to have parking in on tract within 300 feet of the building it serves, thus making the parking arrangements allowed in SFDUs and by some nearby cities possible.

(1) Parking for single and multifamily dwellings shall be within 300 feet of ~~((and on the same lot or building site with))~~ the building it serves. If the parking is not on the same lot or building site as the building, it shall be on a lot or tract that provides a parking easement and is configured in a way that provides safe walking conditions to the building served by the parking.

There are precedents for subdivisions with some, or all, of their parking on common tracts, most often as part of provisions for cottage subdivisions. Snohomish County already allows this in [SCC 30.41G.037](#) which provides parking standards for cottage housing in unincorporated areas. For reasons unknown, no development has taken place under [Chapter 30.41 SCC](#).

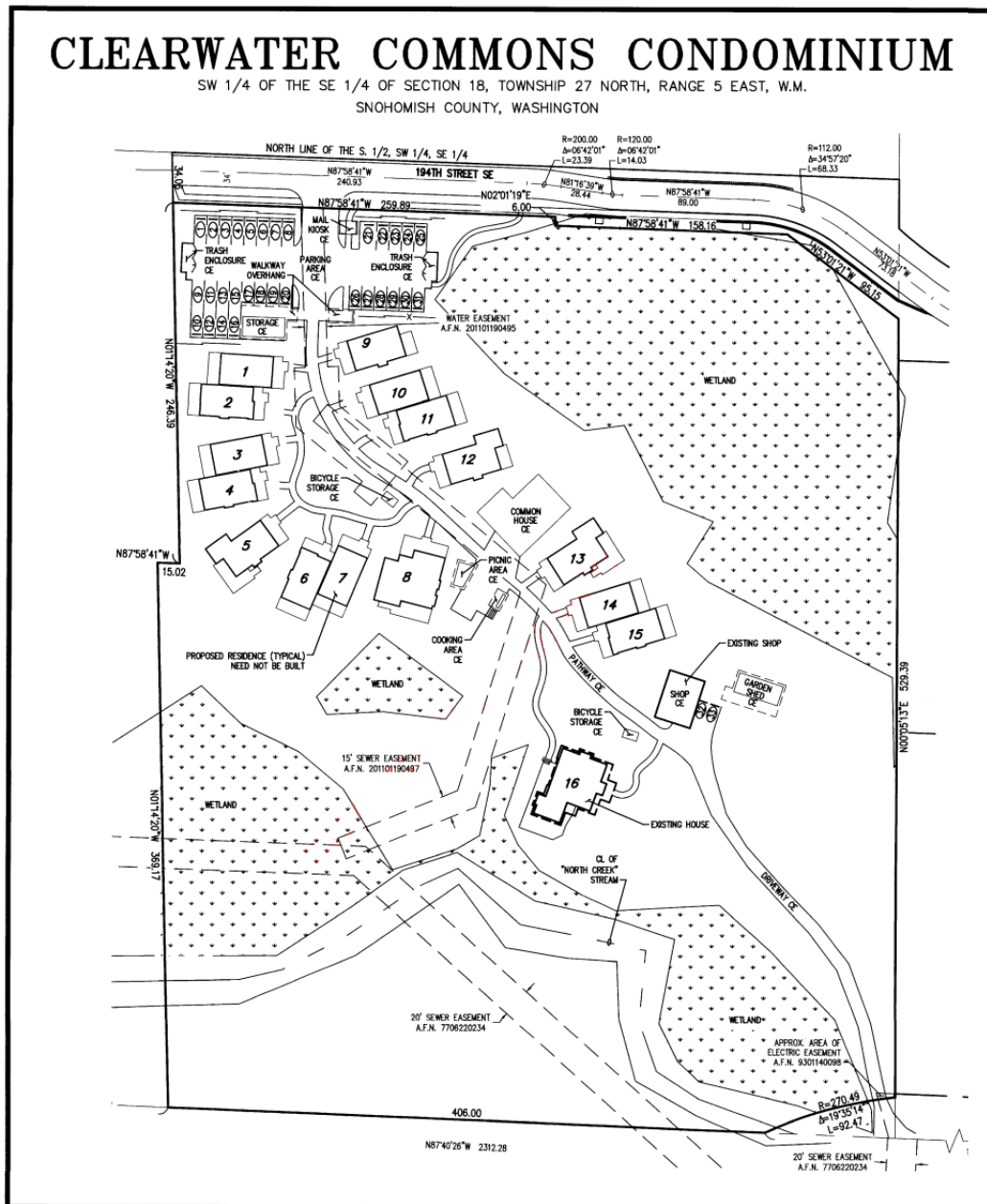
Example 3A. Subdivision with consolidated parking on a tract. Woodson Crest Cottages is an 8-lot subdivision approved by the City of Mukilteo and recorded under Auditor File Number 200610195042. The figure below highlights subdivision Tract B. Tract B contain all parking. Some parking is in open parking stalls, and the rest is in two parking garages on the tract.



Effect of Ordinance 3: The proposed amendments to SCC 30.26.020(1) in Ordinance 3 would allow parking in the manner provided at Woodson Crest.

Design Differences: By consolidating parking in one location, Woodson Crest has less paving and impervious surface than a typical 8-lot subdivision. No other design differences have been identified.

Example 3B. Consolidated parking with a mixed of detached and attached homes. Clearwater Commons (PFN 2006-131051 LU) consists of sixteen condominium homes. It has ten attached units and six detached. There are 31 parking stalls consolidated in a parking area on the north, and two more parking stalls next to a shop building on the southern developed area. The site is heavily constrained by wetlands and buffers. The zoning is MR.



Effect of Combining Ordinances 1-3. Snohomish County permitted Clearwater Commons under procedures that pre-date the current SFDU process. Parking consolidation meet code because it is one development site. Ordinance 3 would allow parking consolidation if this could be a subdivision. However, this project would need both Ordinance 1 to allow subdivision of the attached units and Ordinance 2 to enable this layout in MR zoning by reducing the minimum lot size requirement for MR.

Design Differences. Current codes create at least two potential design differences.

First, an SFDU like Clearwater Commons would not need to provide as much tree canopy as it would as a subdivision (20% tree canopy as an SFDU, 30% as a subdivision per Table 30.25.016(3)). In practice, Clearwater Commons far exceeds these requirements because the vegetation in protected wetlands and buffers would count as canopy.

Second, relates to number of parking spaces. The guest parking requirements for SFDUs became effective after the application to develop Clearwater Commons. If applied for today as an SFDU, Clearwater Commons would need a total of 36 parking spaces (32 for the units + 4 guest spaces). The applicable requirement for this development was to provide 32 parking spaces overall (Clearwater Commons has 33 spaces). As a subdivision, it would need to provide 32 spaces for the units and an additional space in each driveway; however, that driveway space would not be a requirement if the parking were on a tract as in this example.

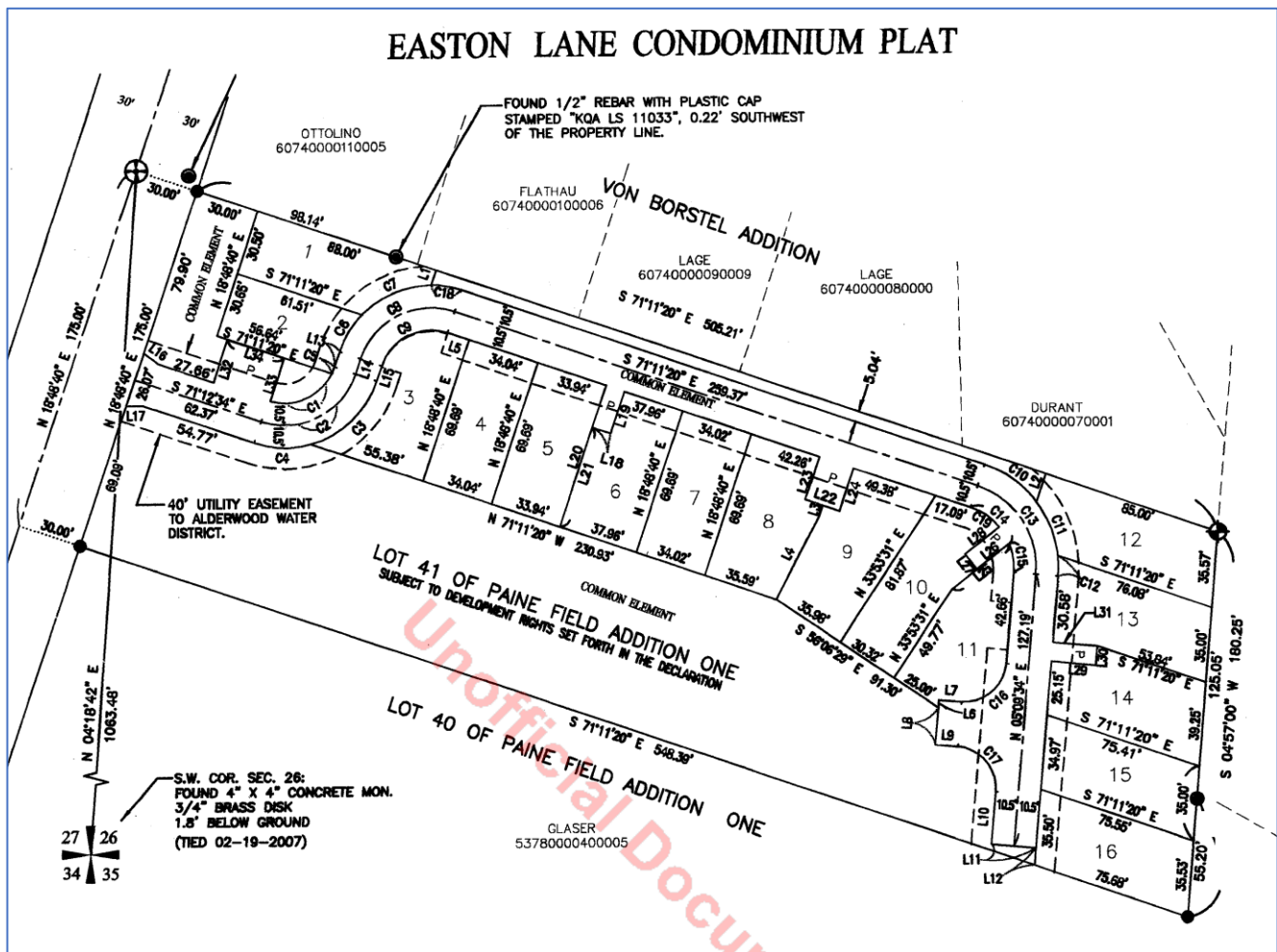
Ordinance 4. Lot Size Averaging

Ordinance 4 would make four changes related to lot size averaging (LSA). It would:

1. Reduce the minimum lot width in urban zones using LSA to 34' from the current 40' (to allow for equivalent site designs as in two other common development types).
2. Allow the area for open stormwater ponds to count in the lot yield calculation (greatly simplifying the gross lot yield calculation and slightly increasing potential densities in urban areas).
3. Moving the provisions for LSA in rural zones to its own code section (to further simplify the code language without having any substantive impact).
4. Eliminating provisions for LSA in R-12,500, R-20,000 and WFB zones (LSA in R-12,500 conflicts with health code for septic; LSA in R-20,000 creates lots that do not conform to the comprehensive plan; increased use of LSA in WFB may be contrary to the adopted purpose of the zone).

Of these changes, the proposed reduction of minimum lot width would have the greatest impact and is the main purpose of this proposed ordinance.

Example 4A. Lot width in comparison to an SFDU. Easton Lane (05-117989 LU) is an SFDU-type development with 16 detached units. Its layout wraps around the north side of a wetland. The site is 2.11 acres and has LDMR zoning. This could theoretically have allowed 23 total units. However, the maximum density was not achievable since much of the site was unbuildable due to wetland and buffer areas. When it recorded as a condominium, each unit became a limited common element (or LCE). These units look on the recorded condominium map like a lots in a subdivision. Such units own a share of the entire site with an exclusive right to use the LCE, but the unit does not individually own the land under the LCE. From a design standpoint, the LCE unit widths range from 30.32 feet (Unit 10) to 37.98 feet (Unit 6). The average lot width is approximately 34 feet. This narrow unit design made it possible to fit more units around the wetland than would have been the case if the smallest LCE unit width had been 40 feet (the current minimum lot width for lot size averaging in urban zones).



Effect of Ordinance 4. The proposed reduction in minimum lot width for LSA in urban zones from 40 feet to 34 feet would allow an LSA subdivision on the Easton Lane site with a comparable number of lots as units.

Design Differences. Road width and tree canopy may require slightly different design for an LSA subdivision vs an SFDU condominium.

As a subdivision, the access would need to meet the road standards that apply to subdivisions (wider) than the narrower drive aisle standards that Easton Lane condominium provides. In an alternative LSA design, wider access might have reduced the overall number of lots/units because less space would be available for the building footprints. An alternative approach on this site would be to develop a subdivision of attached single family residences under Ordinance 1. The advantage of attaching single family units is that more building space can fit on a smaller footprint (because there are fewer empty side yards taking up otherwise buildable space).

For tree canopy, SCC 30.25.016 requires a 30% canopy coverage for a 16-lot subdivision and a 20% canopy for a 16-lot SFDU. The reduced lot width in Ordinance 4 would thus generally encourage development that provides more tree canopy. Applied to the Easton Lane site specifically, this might not be the case because the wetland and buffer area would count as persevered vegetation that more than satisfies the tree canopy requirements.

Lot yield calculations. Early developments using lot size averaging included surface detention/ retention facilities in open vaults that generated complaints about aesthetics and mosquitos. This contributed to changes adopted in Amended Ordinance 03-075 (Ord 03-075) in 2003 that said that surface detention/retention facilities shall not count toward the calculations of lot yield. Since that time, several changes in state and county stormwater regulations have increased the amount of stormwater detention/retention required. The most significant state-level changes were in 2007 when stormwater requirements increased by approximately 250%. Rather than resulting in larger open surface vaults and fewer lots, nearly all stormwater facilities are now close vaults below road or open space areas. This makes the exclusion of surface detention/retention facilities mostly a superfluous complication to the lot yield calculations. To the extent that developers still build surface facilities, excluding the land area of these facilities from the lot yield calculations reduces housing production. This lost potential housing production is generally contrary the purpose of Ordinance 4 which is to promote more affordable ownership options.

LSA in rural areas. Ordinance 4 would separate lot size averaging requirements in SCC 30.23.210 into two code sections for urban zones and for rural zones. This makes the requirements easier to understand and use. When Amended Ordinance 02-064 first enacted SCC 30.23.210 in 2002, it contained 183 words. Now there are 779 words in the current version of SCC 30.23.210 (as modified by Amended Ordinance 22-062 in 2022). This proposal would keep the urban zoning provisions in SCC 30.23.210 and reduce the word count to 264. The proposal would move the lot size averaging provisions for rural zones to a new section SCC 30.23.215 which would have 211 words. This organizational change will help applicants determine which standards apply based on the applicable zoning.

LSA in R-12,500, R-20,000 and WFB. The proposed amendments remove the possible use of lot size averaging in the R-12,500, R-20,000 and WFB zones.

For R-12,500 and R-20,000, this would help implement the comprehensive plan and to reduce situations with non-conforming lots. Most of the locations where R-12,500 and R-20,000 appear on the zoning map are non-conforming to applicable future land use map designations. Since septic system requirements include a

minimum lot size of 12,500 square feet, it is not feasible to use lot size averaging in the R-12,500 zone. Eliminating provisions to use lot size averaging in R-12,500 zoning thus helps to clarify development options by eliminating a hypothetical allowance that does not work. Development has already happened on most of the sites with R-20,000 zoning. Eliminating the option for using lot size averaging on the remaining R-20,000 sites reduces the possibility of creating more parcels that do not conform to the applicable comprehensive plan designations.

SCC 30.21.025(4) describes the purpose of WFB zoning. It is no longer a primary implementing zone but rather it services to protect natural features and critical areas. All sites with WFB zoning have frontage on Lake Stickney, Martha Lake, or Puget Sound. These areas are at least partially subject to Shoreline Management Act protections. Nearly all properties with WFB zoning have existing development with homes on relatively narrow but long lots. The proposed amendments include a reduction to the required lot width. Applying a 34-foot minimum lot width rather than the current 40-foot minimum to sites with WFB zoning could potentially increase the buildable land inventory of WFB-zoned sites by making some of the existing lots subdividable. Individually such sites would still be subject to critical areas protections, including for shorelines. However, there has been no study of the cumulative effects called for in Policy NE 3.A.3. Therefore, the proposed amendments would exclude the continued use of lot size averaging in WFB zoning to avoid potential impacts consistent with Policy NE 3.A.5 and the purpose of the zone in SCC 30.21.024(4).