

Snohomish County 2024 Comprehensive Plan Update
2024 Reasonable Measures Report
Executive Recommendation



March 2024

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2024 REASONABLE MEASURES REPORT

INTRODUCTION

As part of the Growth Management Act (GMA), Revised Code of Washington (RCW) 36.70A.215 requires certain jurisdictions planning under GMA to review and evaluate whether actual development within the urban growth areas (UGAs) is at urban densities and consistent with GMA goals, adopted growth targets, development assumptions, and objectives in the countywide planning policies (CPPs), and local comprehensive plans. The program is commonly referred to as “buildable lands” and documented in a report due three years prior to each periodic comprehensive plan update required under RCW 36.70A.130. If an inconsistency is found, it requires implementing reasonable measures, other than adjusting UGA boundaries, that are likely to increase consistency. The purpose of this requirement is to increase residential or employment capacity within the existing UGAs prior to expanding the UGA. This requirement advances GMA objectives for compact development and reduced urban sprawl.

The *2021 Buildable Lands Report for Snohomish County* (BLR) was prepared to meet the GMA review and evaluation requirements. It found that overall, at the countywide UGA level urban densities are being achieved consistent with GMA plans and there was sufficient capacity to accommodate 2035 growth targets. It did identify development capacity shortfalls in a small number of incorporated cities and towns.

Subsequent to that analysis, Snohomish County adopted new 2044 initial growth targets based on the regional growth strategy in the Puget Sound Regional Council VISION 2050 multicounty planning policies, and consistent with the most recent population projections from Washington Office of Financial Management published in 2022. As a result, many jurisdictions in the county must plan for much greater growth than the 2035 capacity from the 2021 Buildable Lands Report as part of the 2024 periodic update.

The County reviewed alternative ways to accommodate the unincorporated share of projected growth. Review and analysis of “reasonable measures” allow the County to maximize the utilization of land within UGAs before considering UGA expansions. The periodic update process will be completed by reconciliation of residential and employment growth targets after adoption of the County and city and town comprehensive plans in 2024. Those updates, which include adoption of reasonable measures by jurisdictions, if necessary, will be reconciled to provide final growth allocations that will be adopted into the CPPs.

This “Reasonable Measures Report” reconfirms Snohomish County fulfillment of the GMA requirements under RCW 36.70A.215 and is being prepared pursuant to the Snohomish County CPPs as part of the 2024 update.

Snohomish County has implemented the reasonable measures requirements in RCW 36.70A.215 through the CPPs. Regardless of whether an inconsistency is found in the BLR, CPP GF-7.b requires consideration of reasonable measures prior to adopting UGA expansions that increase development capacity:

A list of reasonable measures that may be used to increase residential, commercial and industrial capacity in UGAs, without adjusting UGA boundaries, is contained in Appendix D. The County Council shall use the list of reasonable measures and guidelines for review contained in Appendix D to evaluate all UGA boundary expansions proposed pursuant to DP-2.

This requirement is met by referring to a list of measures and guidelines in Appendix D of the CPPs. As described in Appendix D:

Beginning with the updates to be completed in 2004 and 2005, each jurisdiction (the relevant city and the county) will demonstrate its consideration of reasonable measures in its comprehensive plan or, at its discretion, in a separate report. Each plan's environmental review or adoption documents will report on the sufficiency of the reasonable measures specified in its plan or report...

Jurisdictions should review and update their reasonable measures programs and finding of sufficiency at least every eight years in conjunction with the buildable lands review or their comprehensive plan update...¹

Appendix D also identifies additional sources for guidance on meeting the requirements in CPP GF-7 and Appendix D in two reports prepared by ECONorthwest titled "Phase II Report: Recommended Method for Evaluating Local Reasonable Measures Programs," approved by the Snohomish County Tomorrow (SCT) Steering Committee in June 2003 and the "Reasonable Measures Program Technical Supplement," approved by the SCT Steering Committee in June 2020.

This report has been prepared to satisfy the requirements in CPP GF-7.b to demonstrate a consideration of reasonable measures as part of the Executive Recommended 2024 Update of the Snohomish County GMA Comprehensive Plan (GMA CP). This report demonstrates the sufficiency of that program in considering reasonable measures prior to consideration of UGA expansions to accommodate growth projected over the twenty-year period through 2044 as required under RCW 36.70A.130.

¹ Note that the timing of the periodic update in RCW 36.70A.130 has been revised from eight years, and that 2024 is the deadline for the current update.

Section 1 of this report gives a brief summary of findings of the 2021 BLR and how the initial 2044 growth targets compare to the 2035 land capacity measured in the BLR.

Section 2 identifies amendments to the GMACP future land use (FLU) map and policies, rezones, code amendments, and other actions that qualify as reasonable measures that have been adopted since the 2021 BLR analysis or are recommended as part of the Executive Recommendation for the 2024 Update of the GMACP.

Section 3 analyzes the impact for residential and employment capacity resulting from reasonable measures as compared to UGA expansions proposed as part of the Executive Recommendation for the 2024 Update of the GMACP.

Appendix A provides a list of all the reasonable measures identified in Appendix D of the CPPs and identifies which have been adopted for the unincorporated County, which are recommended as part of the 2024 Update, and which have not been adopted by the County.

Note that it is anticipated that cities and towns in the county will also consider reasonable measures as part of their 2024 periodic updates and will self-certify pursuant to the CPPs. As of this writing, those jurisdictions have not yet adopted updated plans and so have not yet documented their reasonable measures. In January 2024, County staff reached out to the cities and towns and requested information about the status of their plan updates, whether they are planning for the adopted initial 2044 growth targets, and information about significant reasonable measures they are considering. Those jurisdictions are in various states of progress, and of those that responded, nearly all of them expect to adopt plans consistent with the initial targets. One, the City of Marysville, a city identified for higher growth under the PSRC VISION 2050 regional growth strategy because of planned high-capacity transit service, is considering growth targets higher than the initial targets. None of the cities or towns that responded identified that they are considering lower growth targets. This indicates that cities and towns either had sufficient capacity documented in the 2021 BLR or are considering reasonable measures to accommodate their growth targets. County staff will reach out again later in the process to request updated information related to growth targets and reasonable measures as the County progresses with its update and as preparation for the reconciliation process after the adoption of plans in 2024.

1. FINDINGS OF THE 2021 BUILDABLE LANDS REPORT AND ADOPTION OF INITIAL 2044 GROWTH TARGETS

2021 Buildable Lands Report

Snohomish County completed the 2021 BLR in 2021, adopted September 8, 2021. The detailed analysis of growth and development trends for each of the cities and towns and unincorporated area of the county was completed jointly through SCT. The development history studied for the

report built on the previous reports adding the period from 2011 to 2018. The report included the following key findings:

- Overall, at the countywide UGA level:
 - urban densities are being achieved consistent with GMA comprehensive plans, and
 - there is adequate land capacity to accommodate the adopted 2035 total UGA population, housing, and employment growth targets. This is also the case for cities overall and the unincorporated UGA overall.
- At the individual city level, there is adequate capacity to accommodate the adopted 2035 population growth targets, with the following exceptions:
 - there is a significant 2035 population capacity shortfall within the City of Everett, and
 - minor capacity shortfalls appear to exist for Gold Bar and Index.
- At the individual city level, there is adequate capacity to accommodate the adopted 2035 employment growth targets, with the following exceptions:
 - relatively minor 2035 employment capacity shortfalls appear to exist for the cities of Granite Falls and Lake Stevens.
- Progress has been made towards the achievement of the 2035 population growth targets by individual jurisdictions.

Adoption of Initial 2044 Growth Targets

On February 23, 2022, Snohomish County adopted the initial 2044 population and employment growth targets in Appendix B of the CPPs. These targets were developed by working jointly with the cities and towns in the county through SCT and based on the VISION 2050 regional growth strategy in the MPPs. That growth strategy categorizes jurisdictions and parts of the unincorporated county based on their role in accommodating growth in the future. Forecasted growth is allocated primarily within the UGA, with particular emphasis on areas near high-capacity transit and in regional growth centers. As a result, the regional geographies with these features, the Metropolitan City, Core Cities, and High Capacity Transit (HCT) Communities regional geographies, are planned for higher levels of growth compared with historical trends. Other regional geographies in the UGA (remaining Cities & Towns and Urban Unincorporated Areas) are planned for more modest levels of growth. For the unincorporated County, most of the unincorporated area of the Southwest UGA that is in a Municipal Urban Growth Area (MUGA) affiliated with a city for future annexation is part of the HCT Communities regional geography emphasized for growth, while areas of the Southwest UGA not associated with a city for annexation, and all other unincorporated UGAs, are categorized as Urban Unincorporated Areas that are de-emphasized for future growth.

As required by GMA, the initial growth targets fall within the low-high range growth projections from the most recent twenty-year population projection made for the county by the Washington State Office of Financial Management (OFM) that was published in December 2022.

The initial growth targets are expected to be used by the County and jurisdictions within the county for the 2024 periodic update, with the CPPs requiring at least one alternative studied that would accommodate the initial growth targets. Jurisdictions have the option to study other alternatives as well, and there is the opportunity to reconcile differences with the initial targets following the adoption of the 2024 updated plans through the reconciliation process at SCT.

Based on the initial growth targets, Snohomish County and the cities and towns within the county are expected to plan for a large amount of additional growth by 2044, with growth within the UGAs exceeding the 2021 BLR estimated 2035 additional development capacity within the overall combined UGAs by 81,945 population and 39,751 employment.

With a large amount of growth allocated to the Metropolitan City, Core Cities, and HCT Communities regional geographies, nearly all of the cities and MUGAs in those regional geographies have initial 2044 population and employment growth targets that are significantly higher than the 2035 capacity from the BLR.

In the other regional geographies, for population, this was not the case, with just the cities of Brier and Monroe having 2035 population capacity deficits greater than 100 relative to their initial 2044 population growth targets. For employment, the cities of Granite Falls, Lake Stevens, Monroe, Snohomish, and Stanwood, and the unincorporated Lake Stickney and Silver Firs unaffiliated areas of the Southwest UGA each had 2035 employment capacity deficits greater than 100 relative to their initial 2044 employment growth targets.

It should be noted that the initial housing unit growth targets in Appendix B of the CPPs were adopted later. Those were based on a projection model developed by the Washington State Department of Commerce (“Commerce”) to meet new provisions of state law adopted in 2021. That model is called the Housing for All Planning Tool (HAPT) to identify housing need projections associated with a county’s population target. Those new requirements require counties, cities, and towns to plan for housing projections or different household income categories. The HAPT model was not available until March 1, 2023, so the initial housing targets were adopted by Snohomish County on July 19, 2023, later than the population and employment growth targets. Commerce’s model shows a significant increase in the amount of housing needed by 2044 to accommodate growth and make up for under-building in the last fifteen years, particularly in housing types such as low- and mid-rise apartments that would serve low-, very low-, and extremely low-income households. As a result, many jurisdictions are reviewing how to create additional capacity to accommodate the housing targets. An analysis of capacity to meet the housing targets by income categories for unincorporated Snohomish County is included in a separate technical report, the Residential Land Capacity Analysis.

For their 2024 periodic updates, many jurisdictions have initial 2044 growth targets that exceed the 2035 capacity measured in the 2021 Buildable Lands Report (BLR) for their jurisdictions or subareas within their jurisdictions. As a result, it will be necessary for those jurisdictions to consider approaches to increase development capacity in order to accommodate the targets. Generally, approaches to increase capacity may fall into three categories: (1) re-evaluating development assumptions used in the BLR to account for the additional nine years of development, (2) adopting “reasonable measures” such as rezones or changes to development regulations to increase capacity within the jurisdiction and inside the existing UGA boundary, or (3) the County Council can consider expanding the UGA boundary to add additional land to the urban area, if necessary. For the 2024 Update, all three approaches are being considered.

The next sections of this report focus on the sufficiency of the County’s reasonable measures to address residential and employment capacity within the unincorporated UGAs.

2. RECENTLY ADOPTED AND RECOMMENDED REASONABLE MEASURES

The reasonable measures listed below represent significant new measures either adopted by the County for the unincorporated area after completion of the 2021 BLR and not factored into the capacity estimates in that analysis (nor analyzed as part of the No Action alternative studied in the environmental impact statement for the 2024 Update) or are recommended as part of the 2024 Update or concurrent compliance review of the GMACP. These measures are designed to improve the quality of infill development, to provide for a wider range of housing sizes and types, and to increase residential and employment capacity inside the unincorporated UGA.

There may be additional code changes or policy changes recently adopted or under consideration that also help encourage development within the unincorporated UGA but are incremental improvements to provisions already adopted or not included in the list of reasonable measures in Appendix D of the CPPs, and not expected to have a large impact on their own. Many of the reasonable measures in Appendix D of the CPPs have been adopted by the County in the past, so are not listed below because their impacts are already factored into the BLR capacity estimates and do not represent new capacity. Appendix A to this report includes a full list of reasonable measures and whether they have been adopted by the County.

Reasonable Measures adopted after the 2021 Buildable Lands Report

A. Permit Accessory Dwelling Units (ADUs) in single family zones

State law requires certain jurisdictions to allow ADU construction. Snohomish County has long allowed ADUs in single family zones in the unincorporated area. ADUs primarily serve as permanent housing, either as rental units or for multi-generational living. ADUs are considered to have the potential to serve as low-income housing. On June 19, 2021, the County adopted

Amended Ordinance No. 22-018 to further encourage ADU construction. The following are some of the significant changes to regulations:

- ADUs are permitted outright, rather than as a conditional use, in all zones that allow single family dwellings.
- Urban lots are allowed up to two ADUs, if one is attached and the other detached.
- ADUs are allowed on substandard lots in urban zones if there is a legally established single family dwelling.
- Parking requirements were eliminated for ADUs in urban zones.
- There is no longer an owner-occupancy requirement.

There have been subsequent amendments to ADU provisions that mainly affect the rural area.

Following the adoption of the revisions described above, ADU construction increased in the urban area in 2022 and 2023 as shown below:

Table 2.A-1. Accessory Dwelling Units permitted in the unincorporated UGA, 2017-2023

	2017	2018	2019	2020	2021	2022	2023
Urban ADUs Permitted	3	12	2	10	8	19	19

Source: Snohomish County Issued Permits Data, 2017-2023

The passage of House Bill 1337 in 2023 will require the County to consider additional changes to the ADU regulations to meet new requirements in state law to allow two ADUs per lot without requiring that one must be attached and the other one detached. In addition, as a result of the review of barriers to low-income housing development required under House Bill 1220 adopted in 2021, amendments could be considered to remove design requirements and to reduce permit times for ADUs.

Based on recent data and the expectation of further enhancements to the County’s ADU regulations, ADUs are expected to contribute a small but increasing amount of residential development each year to meet the 2044 residential growth targets within the UGA.

B. Missing Middle Housing Ordinance

Snohomish County adopted Amended Ordinance No. 22-016 on May 4, 2022. This ordinance addresses multiple reasonable measures from the list in Appendix D including:

- Provide Density Bonuses to Developers
- Allow Duplexes, Townhomes, and Condominiums
- Increase Allowable Residential Densities
- Encourage Infill and Redevelopment

This ordinance encourages medium density and townhouse development in single family and medium density areas including the following significant changes to regulations:

- Increasing density bonuses for Planned Residential Developments (PRDs) and Townhomes in the R-7200, LDMR, and MR zones;
- Exempting retained existing residential units from density calculations;
- Increasing the permitted building height in R-7,200 zoning from 30 feet to 35 feet to allow more flexibility in the type of housing built; and
- Making townhomes (and mixed-townhomes) a permitted use in R-7,200 zoning rather than an administrative conditional use.

As a result of these code changes, it is expected that townhouse development will become more common within Urban Low Density Residential (ULDR) areas where R-7,200 is a common zone. In addition, the increase in the density bonus from 20% to 50% for planned residential development, townhouse, and mixed-townhouse style development increases the maximum allowable density by approximately 25%, it is anticipated that increased average buildable densities of a similar magnitude will result in the ULDR and Urban Medium Density Residential (UMDR) designations, and particularly within the Southwest UGA where past townhouse development has occurred.

Recommended Reasonable Measures

C. Urban Core Subarea Plan

As part of the 2024 Update of the GMACP, Snohomish County is recommending the adoption of a new Urban Core Subarea Plan as a new element. This plan addresses multiple reasonable measures from the list in Appendix D including:

- Provide Density Bonuses to Developers
- Transfer/Purchase of Development Rights
- Allow Duplexes, Townhomes, and Condominiums
- Increase Allowable Residential Densities
- Encourage Infill and Redevelopment
- Enact an inclusionary zoning ordinance for new housing developments
- Encourage the Development of Urban Centers and Urban Villages
- Allow Mixed Uses
- Encourage Transit-Oriented Design
- Encourage Transportation-Efficient Land Use
- Encourage developers to reduce off-street surface parking
- Promote Vertical Growth
- Design standards
- Urban Amenities for Increased Densities

- Conduct community visioning exercises to determine how and where the community will grow
- Capital Facilities Investments
- Environmental Review and Mitigation Built into the Subarea Planning Process [Non-project EIS]

The subarea is generally located between the cities of Everett, Mill Creek, Lynnwood, and Mukilteo. This area will be served in the future by light rail transit as part of Sound Transit’s Everett Link extension. The vision of the Urban Core Subarea Plan is to create a plan for a complete community with a variety of housing, services, and amenities in proximity that can be accessed by multi-modal transportation modes including transit, walking, and cycling.

This element provides detailed planning guidance and policies specific to the Urban Core Subarea. The intent is to develop urban centers around light rail stations. These centers will serve as the service, amenity, and recreational focal points for the local community. The Urban Core Subarea Plan will guide future decisions on land use and transportation planning. This includes the introduction of new FLU designations for Light Rail Community (LRC) and Mixed-Use Corridor (MUC). The Urban Core Subarea also supports investments in housing, capital facilities and utilities, and economic development programs.

The Urban Core Subarea Plan is comprised of multiple sub-elements that provide policy guidance covering the following:

- Interjurisdictional Collaboration
 - Collaborate with other affected jurisdictions on future planning in the Urban Core Subarea.
 - Collaborate with Sound Transit on siting of light rail stations including reviewing NEPA and traffic studies.
 - Coordinate land use policies along the SR 99 corridor with adjacent municipalities.
- Environment and Climate Change
 - Promote the conservation of streams, wetlands, and environmentally critical areas.
 - Enhance the urban tree canopy by new plantings and preserving existing tree stands.
 - Encourage the expansion of electric transportation infrastructure.
- Land Use and Urban Design
 - Creation and implement LRC and MUC land use designations for the Subarea.
 - Support higher densities and mixed-use development in lands designated as LRC.

- Includes policies regarding building designs, amenity features, and parking reductions.
- The ULDR designation shall not be applied within the subarea. Single family housing will still be permitted under UMDR.
- Housing
 - Establish a targeted inclusionary housing program within areas designated as LRC and MUC.
 - Increase housing variety at a range of affordability levels including missing middle housing such as duplexes, triplexes, fourplexes, and townhomes.
 - Establish indicators for monitoring the affordability and availability of housing for all income levels.
- Transportation and Mobility
 - Includes general mobility policies that support multi-modal transportation and infrastructure improvements.
 - Develop and implement street typologies and design guidelines in the Subarea.
 - Includes transit policies that support collaboration with Sound Transit and Community Transit to expand transit.
 - The plan includes a list of transportation projects needed in the subarea to implement the subarea policies including projects that support pedestrian and bicycle connectivity and access, support transit speed and reliability, and address roadway congestion.
- Parks, Recreation, and Open Space
 - Identify and mitigate barriers to public access to parks and open spaces.
 - Enhance connectivity to the Interurban Trail and North Creek Trail.
 - Acquire lands for new urban parks and open spaces near transit and high-density residential developments.
- Capital Facilities and Utilities
 - Work with service providers to extend services in a manner consistent with growth patterns supported in the Comprehensive Plan.
 - Coordinate with service and utility providers to identify opportunities for co-location of public facilities and infrastructure.
 - The County should coordinate with wastewater service providers to identify unsewered urban enclaves.
- Economic Development
 - Includes policies on business retention, expansion, and workforce training policies for educational and skills training.
 - Includes policies on land development and acquisition policies regarding parcel assemblage for the County.

Included with the major policy initiatives outlined above, the Urban Core Subarea Plan proposes amendments to the FLU designations and rezones in many parts of the subarea to encourage more development at higher densities that is supportive of and served by current and planned high-capacity transit in the area. Two significant redesignations include new mixed-use designations to support light rail station areas and bus rapid transit corridors:

- Light Rail Community (LRC): proposed for 983 acres within the subarea near the light rail station areas at Mariner and at Ash Way as well as the provisional station area at Airport Rd/SR 99. This designation will replace the Transit/Pedestrian Village (TPV) designation as well as the Urban Center designation within the Urban Core Subarea, with some refinements to the areas where the designation will be applied. The LRC designation identifies a higher density area that contains a mix of residential and non-residential uses, served by local multi-modal and active transportation systems, and whose location and development are coordinated with the regional light rail transportation system. The implementing zone is Urban Center, consistent with the existing designations of TPV and Urban Center that apply in most locations proposed for redesignation to LRC. It is anticipated that future implementation efforts will tailor regulations for light-rail station area development.
- Mixed Use Corridor (MUC): proposed for 730 acres within the subarea to the SR 99 corridor and parts of the 164th and 128th corridors outside the LRC designations, and that are served by transit such as Bus Rapid Transit (BRT). This designation identifies a higher density corridor within the Urban Core Subarea that contains a mix of residential and non-residential uses, and whose location and development are coordinated with the regional high-capacity transportation system. The implementing zone is proposed to be MUC, which would be a new zone that is being developed on a concurrent timeline with the 2024 Update.

Adoption of the Urban Core Subarea Plan, along with the construction and operation of major capital facility investments in the form of light rail within the subarea, and implementation through rezones and new regulations, is expected to result in significant infill and redevelopment within the subarea in the period through 2044, allowing the subarea to accommodate over half of the unincorporated residential growth and a large share of employment growth in the planning period.

D. 2024 Update HCT Communities Infill Review

FLU Map amendments and implementing rezones within the existing UGA proposed as part of the 2024 Update address multiple reasonable measures from the list in Appendix D, including the following:

- Allow Duplexes, Townhomes, and Condominiums
- Increase Allowable Residential Densities

- Allow Small Residential Lots
- Encourage Infill and Redevelopment
- Allow Garden and Larger Scale Apartments and other moderate and higher density housing
- Encourage Transportation-Efficient Land Use

The Executive Recommendation includes up-designations that would create more capacity for development in certain areas. The changes are intended to provide additional residential capacity and decrease the need to expand the UGA. The primary focus of the review was to identify areas within the MUGAs in the Southwest UGA that are part of the HCT Communities regional geography that are currently designated ULDR, which primarily allows traditional single family development, but may be appropriate for redesignation to UMDR, in order to allow for a wider variety of housing types including small-lot single family homes, attached single family homes such as townhomes, and small apartment projects in single-family neighborhoods within the existing UGA. This infill review also resulted in recommended redesignations within the Urban Core Subarea and a recommended policy that ULDR designations not be applied within the subarea. In considering which areas would be appropriate for that re-designation the following criteria were considered:

- Development capacity within a community would increase.
- Located near existing medium or high density residential designations, mixed residential/commercial uses, or services such as retail and office.
- Served by existing or planned transit including local bus service, or along transit emphasis corridors, while locations in immediate proximity to high-capacity transit are more appropriate for higher density or mixed uses.
- Avoid “spot-designating” to ensure cohesive form and scale within a community consistent with planning for practical active transportation and local transit service.
- Avoid areas at the exterior of UGA (including near the Puget Sound) that are unsewerable or with topography unsuitable for UMDR development, or areas beneath airport runway approaches.

In a small number of cases, properties within the HCT Communities regional geography are proposed for redesignation from UMDR to UHDR or other higher intensity designations based on similar criteria.

These redesignations affect a large area of the Southwest UGA, as shown in the table below.

Table 2.D-1: Acreage of Proposed Redesignations as part of the Infill Review

Current Future Land Use Designation	Proposed Future Land Use Designation	Acres
Urban Medium Density Residential	Urban High Density Residential	30.2
Urban Low Density Residential	Urban Medium Density Residential	2,345.8

Redesignations within the UGA that were proposed because of the infill review are expected to create substantial additional capacity for small-lot single family, duplex, townhouse, and medium density multifamily development within the existing Southwest UGA by encouraging infill and redevelopment within areas that can be served by transit.

E. Other Recommended Reasonable Measures

Following are other individual policy and code amendments that are either recommended as part of the 2024 Update or being considered on a similar timeline to respond to changes in state law.

- **Mandate Minimum Residential Densities:** The Executive Recommendation for the 2024 Update of the GMACP Land Use Element includes a proposed amendment to policy LU 2.A.1 to increase the minimum net density for residential subdivisions within the unincorporated UGA from 4 dwellings per acre to 6 dwellings per acre. Net density is calculated after subtracting roads, drainage detention/retention areas, biofiltration swales, areas required for public use, and critical areas and their required buffers from the gross area. Because the areas excluded tend to make up a fair portion of a site, in many cases, urban subdivisions are already achieving a net density of 6 dwellings, and this policy change is expected to help prevent under-utilization of land inside the UGA.
- **Encourage the Development of Urban Centers and Urban Villages; Allow Mixed Uses:** In addition to the 2024 Update infill review described in section 2.D of this report, Docket XXI proposal SW10 – CS Real Estate Development that is included in the Executive Recommendation would redesignate and rezone 14 acres within 0.25 miles of a BRT transit station from Urban Industrial use to Urban Center, adding additional capacity within the existing Southwest UGA.
- **Implement a process to expedite plan and permit approval for smart growth projects; Administrative and Procedural Reforms; Streamline Development Regulations and/or Standards:** In response to the passage of Senate Bill 5290 in 2023, Snohomish County Planning and Development Services is undertaking a review of permit review processes and opportunities to streamline that process to reduce permit times substantially.
- **Promote Vertical Growth:** In addition to the 2024 Update infill review described in section 2.D of this report, Docket XXI proposal SW12 – Mietzner that is included in the Executive Recommendation would expand the area east of State Route 99 where increased maximum buildings heights of 75 feet are allowed for multifamily development in areas for within 2000 feet of State Route 99 (instead of 800 feet) and zoned MR, NB, PCB, CB, or GC.

3. ADDITIONAL DEVELOPMENT CAPACITY RESULTING FROM NEW REASONABLE MEASURES

Generally, approaches to increase capacity may fall into three categories: (1) re-evaluating development assumptions used in the BLR to account for the additional nine years of development, (2) adopting “reasonable measures” such as rezones or changes to development regulations to increase capacity within the jurisdiction and inside the existing UGA boundary, or (3) the County Council can consider expanding the UGA boundary to add additional land to the urban area, if necessary. For the 2024 Update, all three approaches have been utilized. This section will show the amount of estimated additional capacity resulting from each of the three approaches for the unincorporated UGA in order to demonstrate the sufficiency of the reasonable measures.

Capacity from Reasonable Measures compared to UGA Expansion

The No Action alternative prepared for the 2024 Update environmental impact statement provides a basis for estimating capacity resulting purely from re-evaluating development assumptions used in the BLR to account for the additional nine years of development. The No Action alternative estimated 2044 capacity based on updated assumptions regarding redevelopment and expected densities but did not include any of the reasonable measures identified in section 2 of this report. It showed greater capacity than the 2035 capacity in the 2021 BLR, but not enough to accommodate the adopted initial 2044 population growth targets for the countywide unincorporated UGA, with a combined shortfall of 12,247 population. It did show sufficient capacity to accommodate the adopted initial 2044 employment target across the countywide unincorporated UGA.

In contrast to the No Action alternative, the Executive Recommendation for the 2024 Update does include sufficient capacity to accommodate the combined adopted initial 2044 population growth target for the countywide unincorporated UGA as well as the employment growth target, as documented in the UGA Land Capacity Analysis for the Executive Recommendation.

To measure the capacity created through reasonable measures in the Executive Recommended 2024 Update, this analysis subtracts the capacity measured for the County Council-initiated Motion No. 22-134 expansion of the Southwest UGA, as modified by the Snohomish County Planning Commission, to find the capacity within the existing UGA in the Executive Recommendation, then subtracts the capacity measured in the No Action alternative to estimate the additional capacity created through reasonable measures, as shown in table 3-1.

Table 3-1: Additional 2044 Capacity from Reasonable Measures compared to UGA Expansion

	No Action Total Capacity	Exec. Rec. Total Capacity (excluding UGA expansion)	Additional Capacity from Reasonable Measures	Additional Capacity from UGA Expansion	Total Additional Capacity beyond No Action	Reasonable Measures Share
Uninc. UGA Pop	304,927	334,144	29,217	2,312	31,529	92.7%
Uninc. UGA Emp	61,915	63,934	2,019	208	2,227	90.7%

Sources: 2024 Update DEIS No Action capacity estimates, Executive Recommendation UGA Land Capacity Analysis

Conclusion

This analysis demonstrates the sufficiency of Snohomish County’s reasonable measures program. For the countywide unincorporated UGA, the 2024 Update Executive Recommended plan would increase population capacity by a combined 31,529 above the No Action alternative, a 10.3% increase, with 92.7% of the increase coming from reasonable measures within the existing UGA.² It would also increase additional employment capacity by a combined 2,227 jobs, with 90.7% of the increase from reasonable measures.

² As a point of comparison, the *Snohomish County Reasonable Measures Background Report* for the 2005 periodic update, revised February 1, 2006, included the following finding: “Reasonable measures account for over 45% of the additional population capacity created as a result of the adopted 10-Year Update. Additional capacity created throughout the existing countywide unincorporated UGA as a result of new reasonable measures is approximately 14,400 persons, compared with new capacity through UGA expansion of about 17,100 persons. The total additional capacity for 2025 added to the countywide unincorporated UGA through FLUM redesignations inside the existing UGA plus UGA expansions adopted with the Ten-Year Update is roughly 31,500 persons.”

APPENDIX A: TABLE LISTING STATUS OF REASONABLE MEASURES FOR UNINCORPORATED SNOHOMISH COUNTY

The following table lists all of the reasonable measures in Appendix D of the CPPs and identifies those already adopted by Snohomish County for the unincorporated area as documented in the *Snohomish County Reasonable Measures Background Report* from the 2005 periodic update, revised February 1, 2006, and in the survey responses for unincorporated Snohomish County from the *Snohomish County Tomorrow 2023 Housing Characteristics and Needs in Snohomish County*, and those that are recently adopted or recommended as identified in this report.

Reasonable Measures	Adopted Prior to 2021 Buildable Lands Report	Recently Adopted or Recommended
Permit Accessory Dwelling Units (ADUs) in single family zones.	✓	✓
Provide Multifamily Housing Tax exemptions to Developers		
Provide Density Bonuses to Developers	✓	✓
Transfer/Purchase of Development Rights	✓	✓
Allow Clustered Residential Development	✓	
Allow Co-housing	✓	
Allow Duplexes, Townhomes, and Condominiums	✓	✓
Increase Allowable Residential Densities	✓	✓
Mandate Maximum Lot Sizes		
Mandate Minimum Residential Densities	✓	✓
Reduce Street Width Standards	✓	
Allow Small Residential Lots	✓	✓
Encourage Infill and Redevelopment	✓	✓
Enact an inclusionary zoning ordinance for new housing developments		✓
Plan and zone for affordable and manufactured housing development	✓	
Allow Garden and Larger Scale Apartments and other moderate and higher density housing	✓	✓
Develop an Economic Development Strategy	✓	
Create Industrial Zones	✓	
Zone areas by building type, not by use		

Reasonable Measures	Adopted Prior to 2021 Buildable Lands Report	Recently Adopted or Recommended
Develop or strengthen local brownfields programs		
Encourage the Development of Urban Centers and Urban Villages	✓	✓
Allow Mixed Uses	✓	✓
Encourage Transit-Oriented Design	✓	✓
Downtown Revitalization		
Require Adequate Public Facilities		
Specific Development Plans	✓	
Encourage Transportation-Efficient Land Use	✓	✓
Urban Growth Management Agreements	✓	
Create Annexation Plans	✓	
Encourage developers to reduce off-street surface parking	✓	✓
Implement a program to identify and redevelop vacant and abandoned buildings		
Concentrate critical services near homes, jobs, and transit	✓	
Locate civic buildings in existing communities rather than in Greenfield areas	✓	
Implement a process to expedite plan and permit approval for smart growth projects		✓
Administrative and Procedural Reforms	✓	✓
Streamline Development Regulations and/or Standards	✓	✓
Phasing/tiering Urban Growth	✓	
Promote Vertical Growth	✓	✓
SEPA Categorical Exemptions for mixed use and infill development & increased thresholds for SEPA Categorical Exemptions		
Design standards	✓	✓
Urban Amenities for Increased Densities	✓	✓
Conduct community visioning exercises to determine how and where the community will grow		✓
Provide for Regional Stormwater Facilities		

Reasonable Measures	Adopted Prior to 2021 Buildable Lands Report	Recently Adopted or Recommended
Mandate Low Densities in Rural and Resource Lands	✓	
Urban Holding Zones		
Capital Facilities Investments	✓	✓
Environmental Review and Mitigation Built into the Subarea Planning Process		✓
Partner with nongovernmental organizations to preserve natural resource lands	✓	
Public Land Disposition	✓	