

CHAPTER 2

LAND USE ELEMENT

LAND USE VISION

Mount Vernon is committed to being proactive, rather than reactive, in managing growth within the City. The City will adopt and emphasize strategies that promote the City's rich history, natural and man-made beauty, along with its environmental and cultural resources. Emphasis will be placed on creating and promoting land uses that will help to balance land uses where people live, work, and recreate.

INTRODUCTION

The Land Use Element of the Comprehensive Plan is the central document that directs land use patterns and guides land use decisions.

This element provides the basis for the Housing, Transportation, Utility and Capital Facility Plans because it directs future land use patterns by directing population and employment growth.

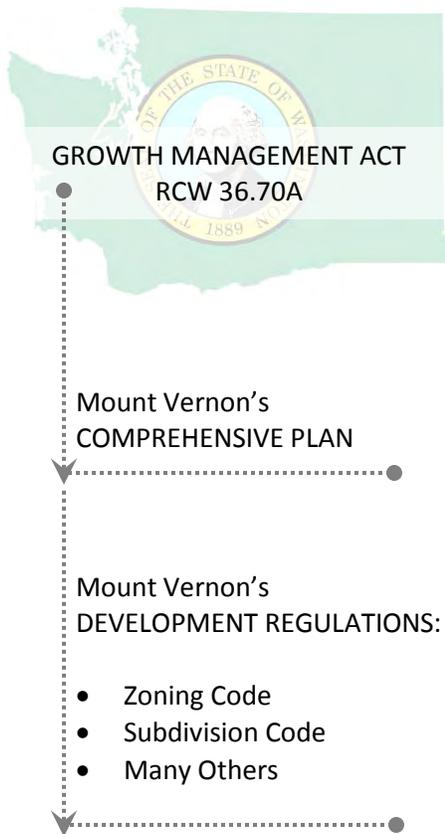
This element discusses the statutory requirements found in the Growth Management Act (GMA) that must be complied with, existing land uses in the

City, how projected growth could be accommodated, land use demographics, and critical areas that are found in the City. The Goals, Objectives and Policies that create the framework within which development regulations for different land uses are created are also contained in this element.

The City has nine (9) existing sub-area plans that are appended to this element along with a list of future sub-area plans that are recommended for future planning efforts.

1.0

LAND USE PLANNING: WHY & HOW



Mount Vernon's first Comprehensive Plan was prepared in 1960. The City updated this first Plan many times up to 1990 when the Growth Management Act (GMA) was enacted by the Washington Legislature. The GMA fundamentally changed the way many jurisdictions planned. The GMA was proposed, and eventually enacted, in response to (among other things) rapid population growth and concerns with lack of environmental protection, deteriorating quality of life and a desire to limit suburban sprawl.

The creation of a Land Use Element is one of the key components of the GMA. The City is required, per the GMA, to show how the next 20-years' worth of growth can be accommodated in the City through sufficient buildable land that has land use designations to allow such growth.

Land use decisions have historically, and will continue to, influence the City's appearance, shape and function. The Goals, Objectives and Policies contained in this Element create the framework within which development regulations (mainly the City's zoning code) can be adopted to ensure the City's high quality of life and desired character is maintained and enhanced over time.

The City uses two different mapping tools as an extension of the Land Use Element. The first map is the City's Comprehensive Plan map. This map identifies in a general way where broad categories of different land uses can be located in the City such as, medium density single family residential uses, high density multi-family uses, or commercial uses.

The second mapping tool is the City's zoning map that identifies site-specific zoning designations for property throughout the City. The zoning map takes the broader Comprehensive Plan map and narrows it to a specific zoning type. Section 6 of this document provides greater detail on all of the City's Comprehensive Plan and Zoning designations and which are consistent with each other.

The zoning map is implemented with the City's zoning code that is adopted as Mount Vernon Municipal Code Title 17. Regulating land uses by zones ensures that an adequate supply of land is available to accommodate future growth while maintaining the planned character within, and between, different zoning designations.

2.0

SETTING & PHYSICAL FORM

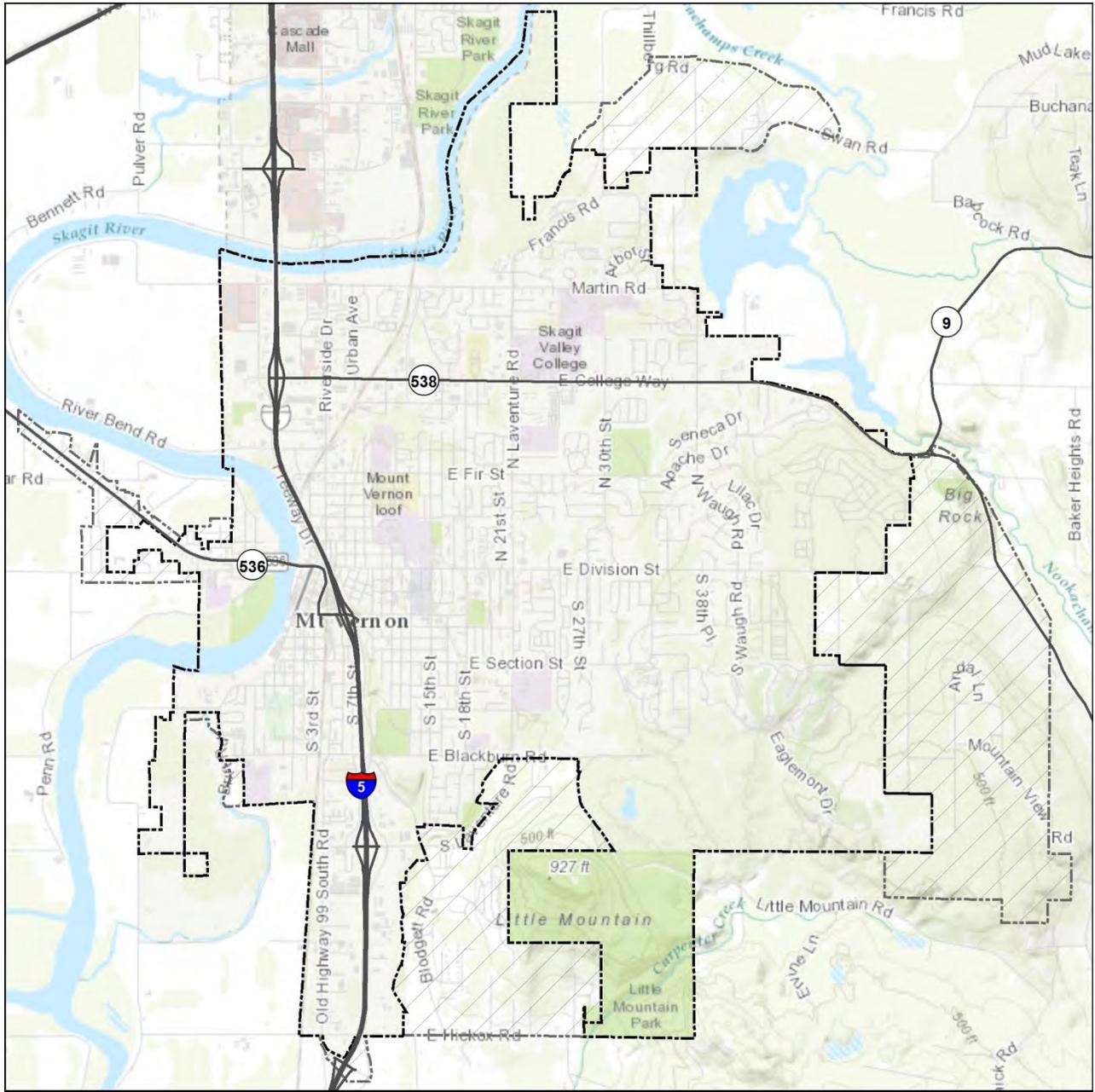
With the Seattle metropolitan area a short distance to the south, Vancouver B.C. to the north, the San Juan Islands to the west, and the foothills of the Cascades to the east, the City is regionally situated to take advantage of both urban and rural amenities. The City is just six (6) miles east of Puget Sound and has Interstate-5 running north/south through the City and State Routes 20, 536 and 538 running east/west through the City, please see Map 1.0.

Mount Vernon's climate is similar to that of the Puget Sound Region, consists of temperate winters with frequent light rain and cool, sunny summers. The warmest month of the year, on average is August with an average temperature of 74.10 degrees Fahrenheit; with January being the coldest month of the year with an average temperature of 34.1 degrees Fahrenheit. The annual average precipitation for the City is approximately 32.7-inches with rainfall fairly evenly distributed throughout the year¹.

Located on the left and right bank of the Skagit River Valley, elevations within Mount Vernon range from approximately 10 feet in the southwestern part of the city along the river to 180 plus feet in the eastern part of the city.



Mount Vernon is located in the heart of a rich agricultural area with a mild climate and good soils well suited to vegetable, seed, berry and bulb production. Mount Vernon is made up of two main groups of soil, near the river are alluvial soils consisting of fine sandy loam and loam, and away from the river are glaciated, upland soils consisting of gravelly loam. Due to agriculture and the alluvial area the valley the limits of the city have been cleared of native vegetation. The areas that are undeveloped are predominately grass, blackberry vines and deciduous trees such as alder, vine maple, with second growth evergreens in the lowlands and the higher elevations.



Land Use Element - Figure LU-1.0 Setting

- City Boundary
- ▨ Urban Growth Area
- State Highway
- ⊕ Skagit County Boundary



Basemap and data courtesy of ESRI, Skagit County, WSDOT, City of Mount Vernon

Map by MV GIS 7/5/2016

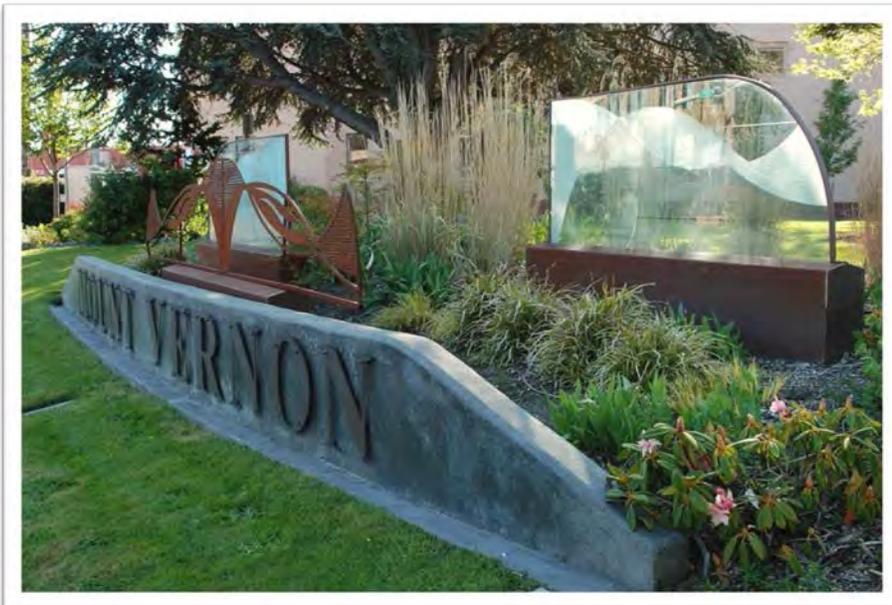
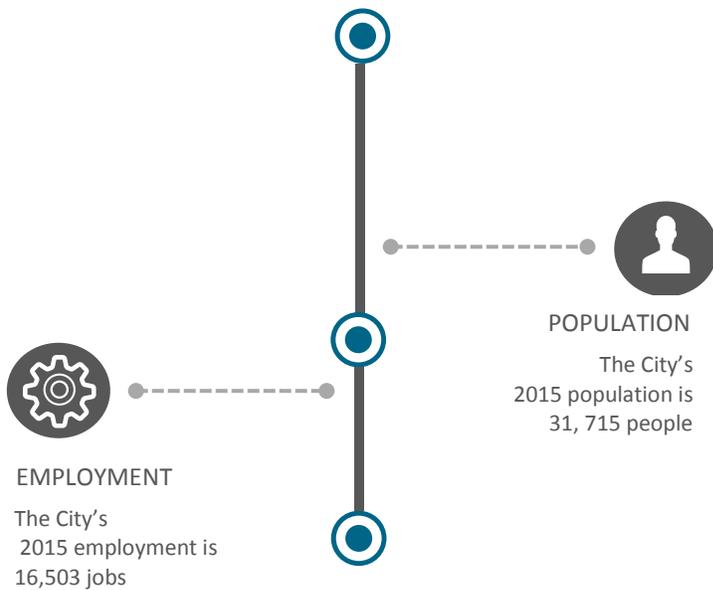
3.0

EXISTING POPULATION & EMPLOYMENT DEMOGRAPHICS

The numbers of people both living and working within the City's corporate boundaries are arguably the most fundamental demographics that must be known and tracked by a jurisdiction, like Mount Vernon, that is required to provide services and plan for future population, housing and employment growth.

The City's existing population and jobs are discussed in the following sections beginning with population growth.

Following this discussion Sections 4.0 and 5.0 examine the future growth the City is anticipated to accommodate over the next 20-years and how this growth could be accommodated in the City and its associated Urban Growth Areas (UGAs).



3.1 HISTORIC/EXISTING POPULATION

Mount Vernon’s population growth has fluctuated widely through time. To be able to compare the City’s population and its growth over time, and to other jurisdictions, this growth needs to be converted growth rates over specified time frames.

The most reliable data sources for population in Washington State includes the decennial (10-year) census from the U.S. Census Bureau and the Office of Financial Management’s population estimates that are

released for year’s in-between the decennial census. However, as Tables 3.0 and 3.1 along with Graph 3.2 below show, there is consistently a rectifying that occurs when the decennial census is released that causes an abnormal jump, either up or down, in population numbers at those points in time because they are being compared to OFM’s population projection the year prior.

In reality, it is very unlikely that consistently, every 10 years, the population fluctuates that greatly.

TABLE 3.0: MOUNT VERNON’S POPULATION GROWTH OVER TIME

1970’s		1980’s		1990’s		2000’s		2010’s	
1970	8,804	1980	13,009	1990	17,647	2000	26,232	2010	31,743
1971	8,804	1981	13,300	1991	18,720	2001	26,460	2011	31,940
1972	8,900	1982	13,625	1992	19,550	2002	26,670	2012	32,250
1973	9,000	1983	13,600	1993	20,450	2003	27,060	2013	32,710
1974	9,270	1984	13,730	1994	20,950	2004	27,720	2014	33,170
1975	10,021	1985	14,210	1995	21,580	2005	28,210	2015	33,530
1976	10,300	1986	14,260	1996	21,820	2006	28,710		
1977	11,021	1987	14,400	1997	22,280	2007	29,390		
1978	11,600	1988	14,590	1998	22,540	2008	30,150		
1979	12,600	1989	14,790	1999	22,700	2009	30,800		

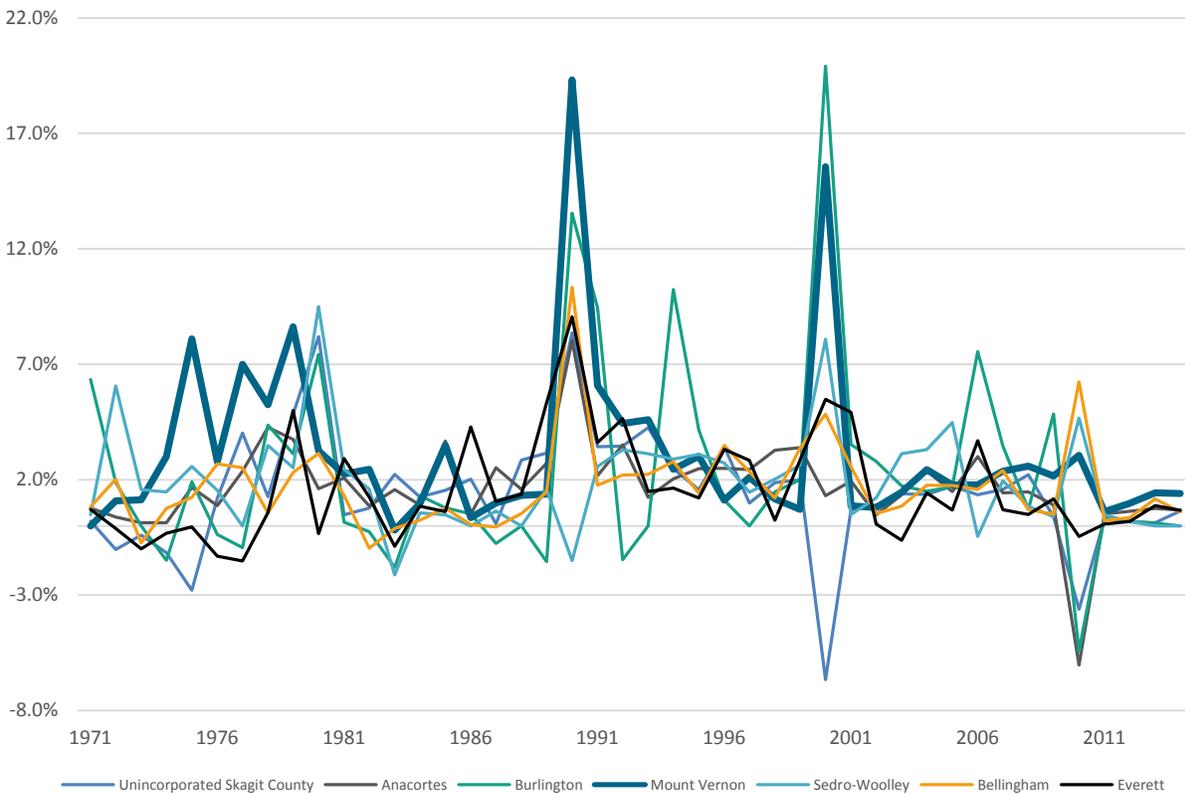
TABLE 3.1: AVERAGE GROWTH RATES BY DECADE

TIMEFRAMES	1970 - 1980	1980 - 1990	1990 - 2000	2000 - 2010	2010 - 2015
AVERAGE GROWTH	3.9%	3.1%	4%	1.9%	1.1%

Graph 3.2, below shows Mount Vernon’s growth rates year-to-year from 1970 to 2014 along with the same growth rates of unincorporated Skagit County, Burlington, Sedro-Woolley, Anacortes, Bellingham, and

Everett. This graph shows the jumps, both up and down, in the growth rates in 1980, 1990, 2000, and 2010 when the U.S. Census data is combined with OFM’s data.

GRAPH 3.2: POPULATION GROWTH RATES OVER TIME COMPARED TO NEARBY JURISDICTIONS



Mount Vernon’s population growth has outpaced unincorporated Skagit County for decades. Between the decades of 1970 to 1980 and 1980 to 1990 Mount Vernon’s growth also outpaced the nearby Cities of Burlington, Sedro-Woolley, Anacortes, Bellingham and Everett.

Similar to Statewide trends, migration to Skagit County – versus natural increase (births minus deaths) has accounted for more half of the new population growth for a majority of the years between 2000 to 2014 as shown in Table 3.5 on the following page. Unfortunately, Mount Vernon specific data is not available due to the way in which birth and death rates are tabulated; however, it is likely that Mount Vernon’s growth follows similar trends as Skagit County does.

TABLE 3.3: MOUNT VERNON AVERAGE DECADE POPULATION GROWTH

Year	# of People	Average Decade % Growth	
1960			
1970	8804	1970 to 1980	3.9%
1980	13009	1980 to 1990	3.1%
1990	17647	1990 to 2000	4%
2000	26232	2000 to 2010	1.9%
2010	31743		
2014	33132		

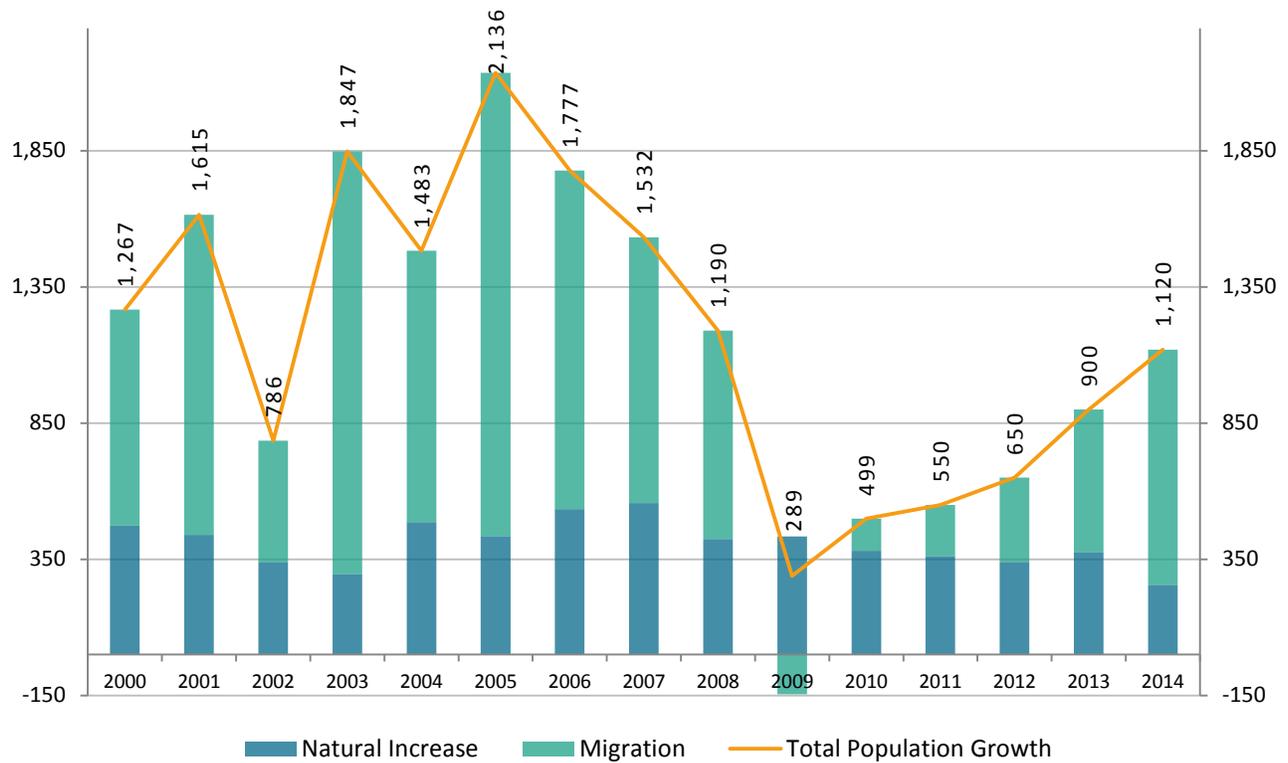
TABLE 3.4: MOUNT VERNON’S GROWTH RATES COMPARED TO NEARBY JURISDICTIONS

	1970 to 1980	1980 to 1990	1990 to 2000	2000 to 2010	2010 to 2014
Mount Vernon	3.9%	3.1%	4%	1.9%	1.1%
Skagit County	1.4%	2.3%	1.7%	.8%	.3%
Burlington	2.2%	1.2%	4.7%	2.2%	.2%
Sedro-Woolley	2.9%	.4%	3.2%	2.0%	.2%
Anacortes	1.6%	2.4%	2.4%	.8%	.6%
Bellingham	1.5%	1.4%	2.6%	1.9%	.6%
Everett	.2%	2.6%	2.7%	1.2%	.5%

TABLE 3.5: SKAGIT COUNTY POPULATION GROWTH COMPOSITION

YEAR	BIRTHS	DEATHS	NATURAL INCREASE	MIGRATION	TOTAL POPULATION INCREASE
2000	1,413	939	474	793	1,267
2001	1,405	965	440	1,175	1,615
2002	1,336	996	340	446	786
2003	1,364	1,068	296	1,551	1,847
2004	1,444	958	486	997	1,483
2005	1,468	1,033	435	1,701	2,136
2006	1,517	983	534	1,243	1,777
2007	1,568	1,011	557	975	1,532
2008	1,601	1,176	425	765	1,190
2009	1,498	1,064	434	-145	289
2010	1,476	1,095	381	118	499
2011	1,463	1,102	361	189	550
2012	1,445	1,104	341	309	650
2013	1,453	1,076	377	523	900
2014	1,405	1,149	256	864	1,120

GRAPH 3.5: SKAGIT COUNTY POPULATION GROWTH: NATURAL & MITRATION



3.2 HISTORIC/EXISTING EMPLOYMENT

The most reliable sources for jobs data that is comparable across different timeframes is from the Washington State Employment Security Department (ESD). Table 3.6 and Graph 3.7 below contain

information on the seasonally adjusted average yearly unemployment rates for the Mount Vernon Metropolitan Statistical Area for the years 2000 to 2015.

TABLE 3.6 SEASONALLY ADJUSTED UNEMPLOYMENT RATES FOR MOUNT VERNON MSA

YEAR	UNEMPLOYMENT RATE
2000	6.5
2001	7.5
2002	8.4
2003	8.2
2004	7.1
2005	6.2
2006	5.6
2007	5.3
2008	6.1
2009	10.2
2010	10.9
2011	10.4
2012	9.6
2013	8.6
2014	7.4
2015	6.7

GRAPH 3.7 SEASONALLY ADJUSTED UNEMPLOYMENT RATES FOR MOUNT VERNON MSA

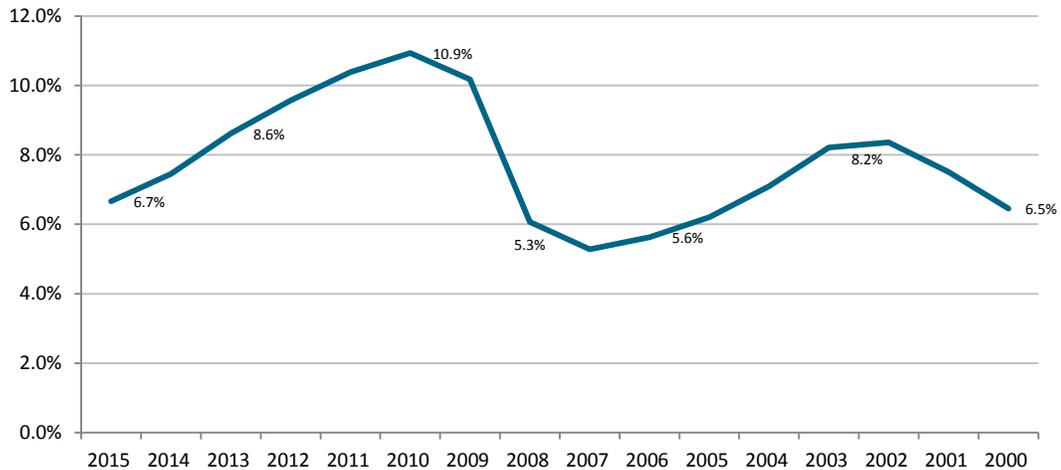


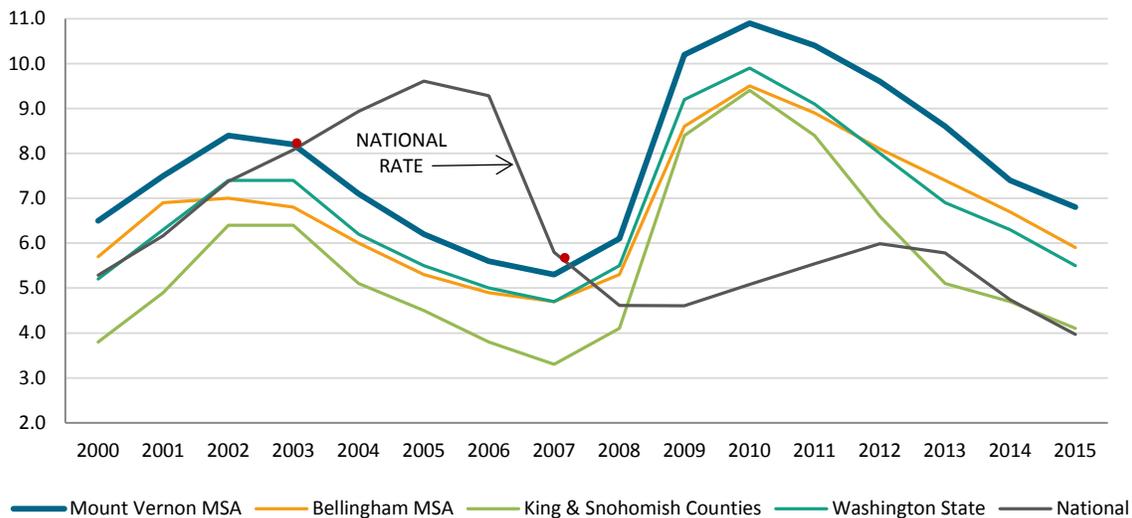
Table 3.8 and Graph 3.9 contain the seasonally adjusted unemployment rates for the Mount Vernon MSA and several nearby jurisdictions along with the overall national rates. The Mount Vernon MSA has historically had higher unemployment rates than the nearby jurisdictions identified below.

However, between 2003 to 2007 the Mount Vernon MSA (along with the other jurisdictions) had much lower unemployment rates than the national rates, which is best illustrated in Graph 3.9. It is important to point out that, overall, Mount Vernon’s unemployment rates are consistent with the trends of nearby jurisdictions.

TABLE 3.8 SEASONALLY ADJUSTED UNEMPLOYMENT RATES FOR IDENTIFIED AREAS

YEAR	MOUNT VERNON MSA	BELLINGHAM MSA	KING AND SNOHOMISH COUNTIES	WASHINGTON STATE	NATIONAL
2000	6.5	5.7	3.8	5.2	5.3
2001	7.5	6.9	4.9	6.3	6.2
2002	8.4	7.0	6.4	7.4	7.4
2003	8.2	6.8	6.4	7.4	8.1
2004	7.1	6.0	5.1	6.2	8.9
2005	6.2	5.3	4.5	5.5	9.6
2006	5.6	4.9	3.8	5.0	9.3
2007	5.3	4.7	3.3	4.7	5.8
2008	6.1	5.3	4.1	5.5	4.6
2009	10.2	8.6	8.4	9.2	4.6
2010	10.9	9.5	9.4	9.9	5.1
2011	10.4	8.9	8.4	9.1	5.5
2012	9.6	8.1	6.6	8.0	6.0
2013	8.6	7.4	5.1	6.9	5.8
2014	7.4	6.7	4.7	6.3	4.7
2015	6.8	5.9	4.1	5.5	4.0

GRAPH 3.9 SEASONALLY ADJUSTED UNEMPLOYMENT RATES FOR IDENTIFIED AREAS



4.0

PROJECTED POPULATION & EMPLOYMENT GROWTH

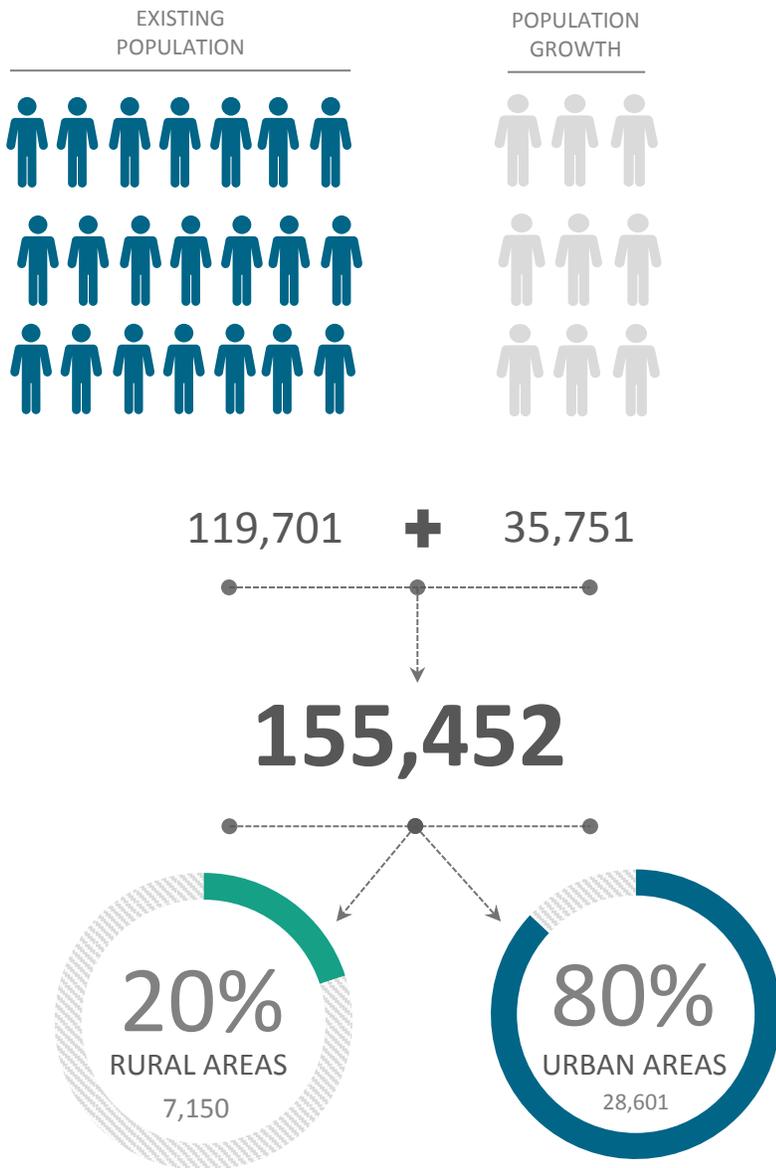
The Growth Management Act (GMA) requires that counties and cities consult to allocate both population and employment growth expected over the 20-year timeframe in which jurisdictions are expected to plan. With the population and employment allocations is work that each jurisdiction must do to make sure they can accommodate the growth they agree to accommodate.

The initial analysis of overall population and employment to be distributed to Skagit County was done by the GMA Technical Advisory Committee (TAC) which is a committee that reports to the Mayors of Each City (or appointed Council members) and the County Commissioners as set forth in the adopted and recorded Framework Agreement (A.F. #: 200211270010) that Mount Vernon, Skagit County, and other County jurisdictions are party to.

Once these overall County-wide numbers and the 80/20 urban-to-rural distributions were preliminarily agreed upon allocations to each 'urban' jurisdiction/area was analyzed, debated, and eventually agreed upon as well. The urban allocations proved to be more difficult to allocate due to a timing issue. This timing issue was created because on one hand each jurisdiction needed a target to plan for; while at the same time, they were updating or creating the information they needed to show that they could accommodate whatever their population or employment target was.

To overcome this challenge the GMA TAC agreed it would be best to consider initial allocations that would be finalized after their respective Buildable Lands Analysis work was completed.

4.1 PROJECTED POPULATION GROWTH



After an analysis of the population growth trends and development capacity measures the countywide target population was placed at 155,452 people; a countywide increase in population of 35,751 people. The urban/rural split for this population remained at 80/20, which means that an additional 28,601 people were allocated to the urban areas and 7,150 were allocated to the rural areas.

The Skagit County overall population projections were arrived at using the Office of Financial Management’s medium population projections. OFM describes the ‘medium population projections’ as the most likely to occur. This initial multi-jurisdictional work and process is memorialized in the BERK Consulting report titled, “Skagit County Growth Projections” dated July 2014, which is contained in Appendix C.

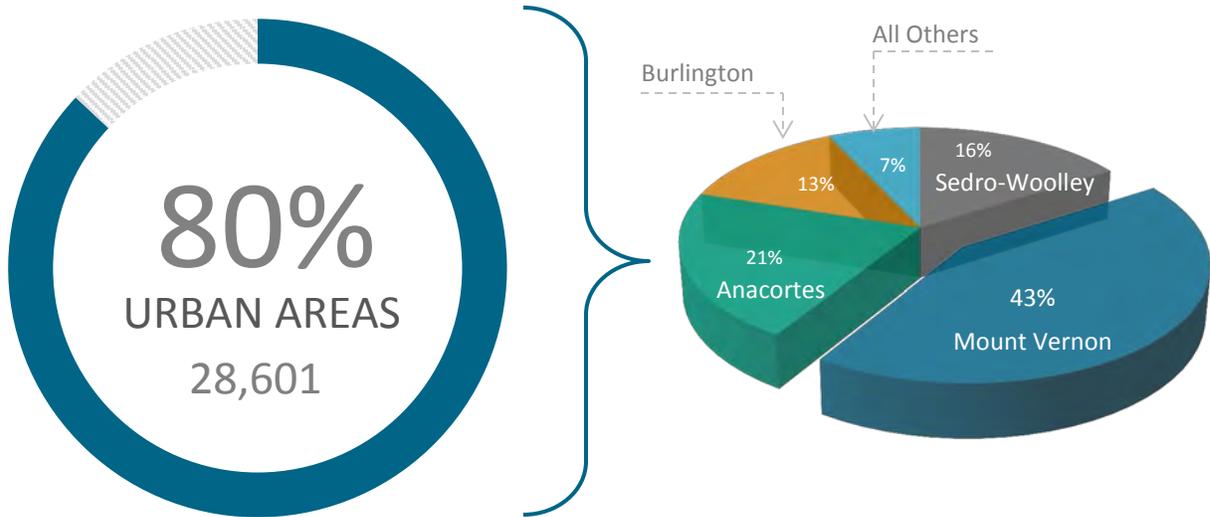


TABLE 4.0 POPULATION GROWTH THROUGH 2036

Jurisdiction (City & UGAs)	2012 Population	2012 to 2015 Population Growth	2015 to 2036 Population Forecast	2036 Population Growth Allocation	2036 Population Growth Allocation Percentage
Anacortes	16,090	308	5,895	22,293	16.5%
Burlington	10,393	71	3,808	14,272	10.7%
Mount Vernon	33,935	1,034	12,434	47,403	34.8%
Sedro-Woolley	12,431	83	4,555	17,069	12.7%
Concrete	873	0	320	1,193	.9%
Hamilton	310	3	114	427	.3%
LaConner	898	-1	329	1,226	.9%
Lyman	441	2	162	605	.5%
Bayview Ridge	1,812	-1	72	1,883	.2%
Swinomish	2,489	15	912	3,416	2.6%
Rural (outside UGAs)	38,277	238	7,150	45,665	20%
TOTAL	117,949	1,752	35,751	155,452	100%

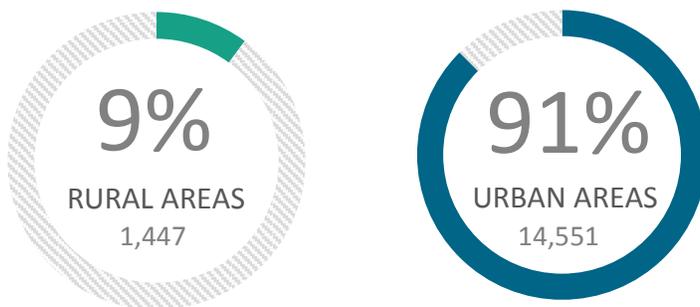
80%
URBAN
ALLOCATION

4.2 PROJECTED EMPLOYMENT GROWTH



51,764 + 15,998

67,762



The Countywide employment projections for the 20-year planning horizon were developed by BERK Consulting based on population/employment ratio assumptions and some Employment Security Department (ESD) growth rates applied to the 2012 job base independent of population growth.

The industry split was determined by considering factors such as: current industry distributions, recent trends, industry shifts, ESD mid-term projections, and other related factors.

Once these baseline projections were completed different methods for allocating the projected jobs were created and analyzed. Through this process the GMA Technical Advisory Committee (TAC) recommended that a projection similar to, but slightly more than, the ESD growth rates be adopted reflecting the desire to further a policy choice that would increase family wage jobs and industrial growth over the 20-year planning horizon.

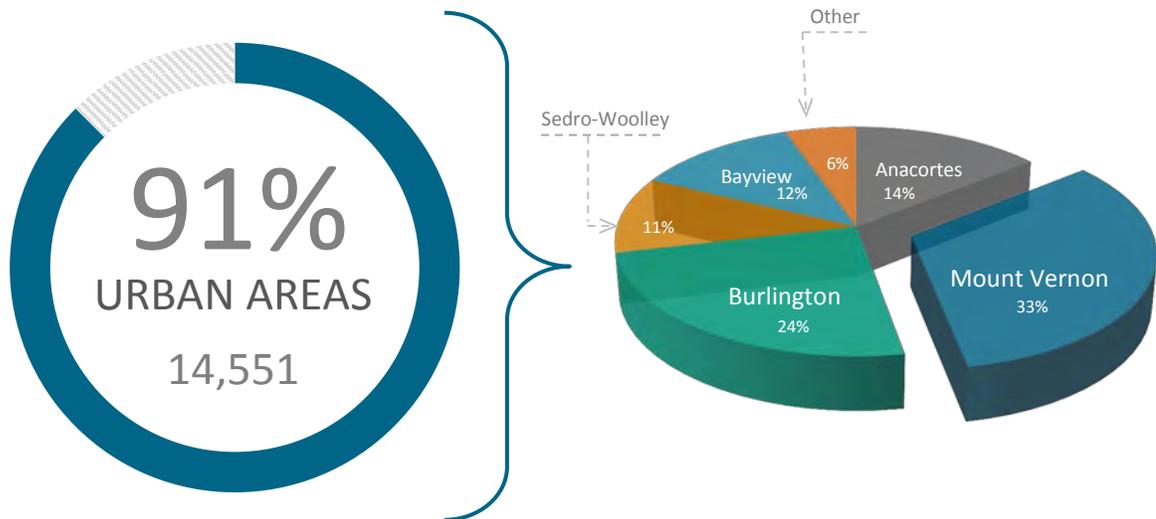
The total employment projection that was initially adopted by the GMA Steering Committee would add approximately 16,000 jobs to Skagit County, as a whole, over 2015 to 2036.

Allocating these jobs to the different jurisdictions was done after review of several different scenarios. The final GMA TAC recommendation was to adopt allocations that reflect trends with the Rural areas receiving 9%, the I-5 corridor receiving 73%, the City of Anacortes receiving 13% and the remaining 5% being allocated to the remaining jurisdictions.

Table 2.8, below, organizes all of these employment projections and allocations. In addition, the BERK Consulting report titled, "Skagit County Growth Projections" dated July 2014, can be found in the accompanying Appendix C.

TABLE 4.1 POPULATION GROWTH THROUGH 2036

Jurisdiction (City & UGAs)	2015 Existing Jobs	2036 Job Allocation	2036 Total Jobs	2036 Job Growth Allocation Percentage
Anacortes	8,404	2,076	10,480	13%
Burlington	9,896	3,516	13,412	22%
Mount Vernon	16,503	4,785	21,288	29.9%
Sedro-Woolley	4,752	1,572	6,324	9.8%
Concrete	358	109	467	.7%
Hamilton	222	66	288	.4%
LaConner	1,091	329	1,420	2.1%
Lyman	29	9	38	.1%
Bayview Ridge	1,656	1,799	3,455	11.2%
Swinomish	957	290	1,247	1.8%
Rural (outside UGAs)	7,896	1,447	9,343	9%
TOTAL	51,764	15,998	67,762	100%



5.0

ACCOMODATING FUTURE GROWTH

To ensure that the City has lands available to support the both the population and employment allocated to the City over the next 20-years the City updated its Buildable Lands & Land Capacity Analysis in 2015/2016. This Analysis identifies the amount of land in each of the

City’s existing zoning designations and estimates the amount of buildable land not encumbered by structures, infrastructure or critical areas. Table 5.0, below, summarizes this data. The entire Buildable Land Analysis is a separate document found in Appendix B.

TABLE 5.0: BUILDABLE LANDS SUMMARY

RESIDENTIAL			COMMERCIAL & INDUSTRIAL		
Type	City Limits New Dwelling Units ²	UGAs New Dwelling Units	Type	< 1 acre	> 1 acres
Single-Family ¹ Residential	1,025	4,284	Commercial ⁵	31	53
Multi-Family Residential ³	276	NA	Industrial ⁶	40.2	72.8
Existing ‘Pipeline’ Developments ⁴	2,338	NA			
Transfer of Development Rights	135	NA			
Totals:	3,774	4,284		71.2	125.8

¹ Includes all existing or future R-1 zones. Existing R-A zoned properties have been assigned to a zoning category consistent with their existing Comprehensive Plan designations. See Appendix B for additional details.

² See Appendix B for the methodology utilized in determining the number of additional lots that could be created.

³ Includes all R-2, R-3, and R-4 zones

⁴ See Appendix B for a list of the existing pipeline developments and their associated lot counts.

⁵ Includes C-1, C-2, C-3, C-4, LC and P-O zones.

⁶ Includes C-L, M-1 and M-2.

The Buildable Lands Analysis takes into account the existing development within the City, and has made conservative assumptions with regard to the location and extent of future street systems, stormwater facilities, critical areas (wetlands, streams, steep slopes, floodways), and future lands that will be developed with public uses such as municipal facilities, schools, parks, open spaces, and churches.

The City will be able to accommodate the number of homes necessary to meet the population that was allocated to the City for the current planning horizon of 2016 to 2036 without any trouble. In fact, over 80% of

the homes necessary to house this population could be located within the *existing* City limits.

Evident from this updated analysis is the lack of commercial and industrial lands available for development within the City. In total the City only has 71.2 acres of commercial/industrial land less than one (1) acre in size; and only 125.8 acres that is greater than one (1) acre in size. The City has been very concerned for some time about not having enough commercial/industrial lands to provide jobs and local tax revenue. See Appendix B for an in-depth discussion on this issue.

6.0

LAND USE PATTERNS

The City's land use patterns have, over time, been heavily influenced by the location of the Skagit River, the Burlington Northern Railroad, Interstate-5, State Routes 536 and 538, and the topographic changes that occur as one heads east and southeast through the City.

The City's first business district was formed on the east side of the river where the City's historic downtown district still exists today (generally between Division and Kincaid Streets).

Additional business/commercial/industrial areas have development around major transportation corridors such as Interstate-5, Riverside Drive, College Way (SR 536) and more recently in the South Mount Vernon area where both Old Highway 99 and Interstate-5 run north/south.

Historically natural disasters such as floods and fires spurred residential growth at higher elevations on the east side of the City moving away from the Skagit River and Interstate-5. In large part these land use patterns still exist today.

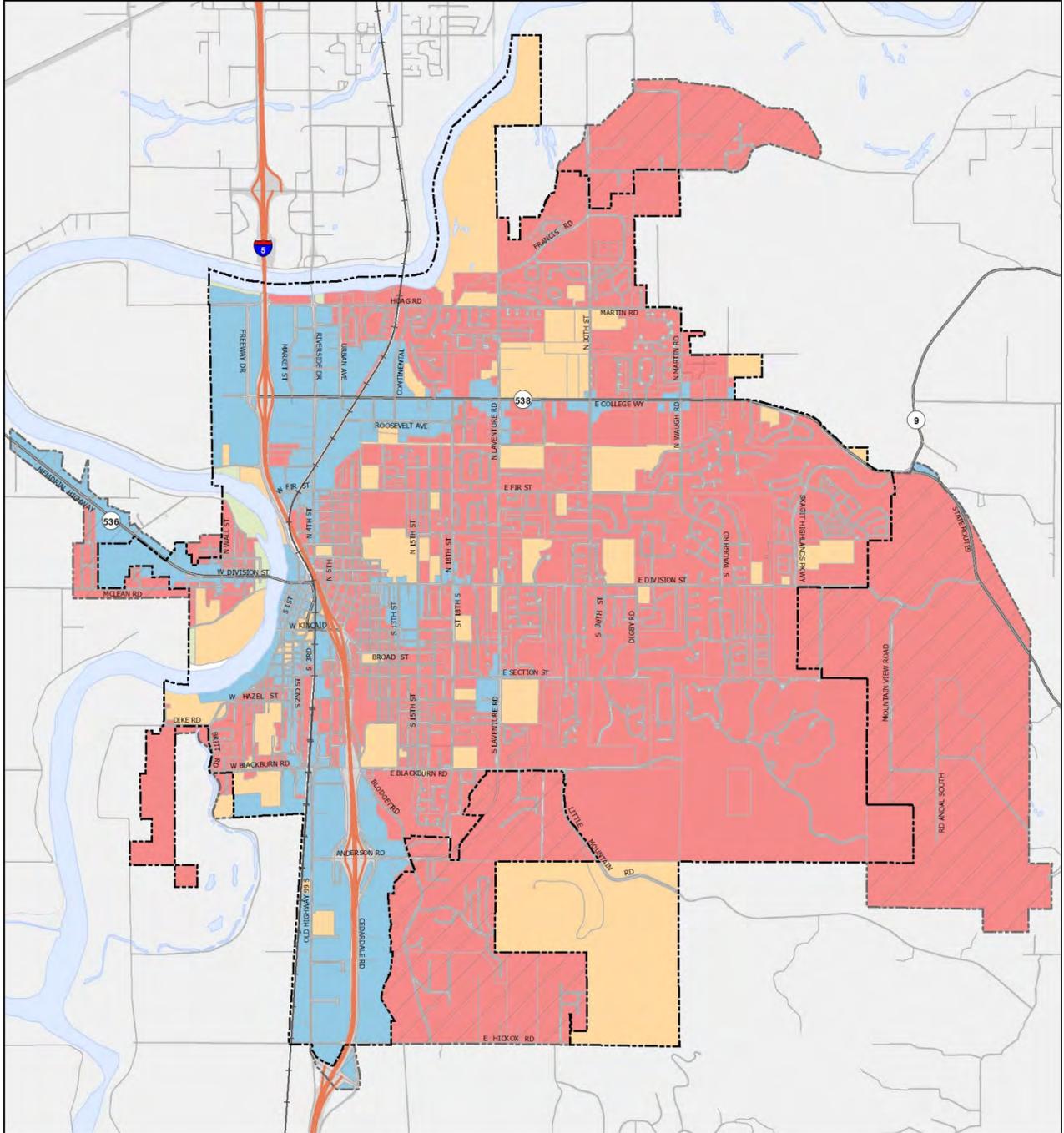
6.1 OVERALL LAND USE TYPES

As of January 1, 2016, there are 6,798 acres that have land use designations within the current City limits and 2,387 acres within the City's UGAs; for a total UGA plus City area of 9,185 acres. This acreage is categorized into the zoning designations outlined in Table 6.0 below. In addition to the 9,185 acres of property zoned within the City and its associated UGAs, there is 1,431 acres of property such as rights-of-way and the river that is not zoned.

To illustrate the City's overall land use designations following is Map 2.0 that shows overall land use types; e.g., commercial, residential, public, and open spaces. In addition to this map Table 6.0 and Graph 6.1 outline and illustrate the City's broader land use designations. Evident from this map and graph is that the City is composed predominately of areas designated for residential purposes.

The City's zoning code has evolved over the years, but remains largely rooted in a Euclidean zoning scheme. Euclidean zoning is characterized by the separation of land uses into specified districts with associated development regulations. As the City's zoning code was changed and updated through the decades the uses allowed within the different zoning designations have been modified such that the current uses allowed within different zones are much different than what the original zoning allowed.

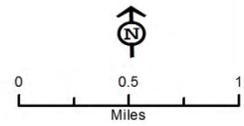
This has created a situation where analyzing zoning designations in the City can be very misleading due to the mix of uses that many of the City's zoning districts allow. For example, looking only at the zoning summaries found in Table 6.0 one could assume that the City had very few multi-family structures since just three percent (3%) of the City is zoned for multi-family residential uses. However, contrary to the zoning summary, 28% of the City has multi-family development already constructed.



Land Use Element - Figure 2.0 Land Uses



- Floodplain
- Residential
- Commercial
- Public
- Public Right of Way
- City Boundary
- Urban Growth Area
- Railroad
- Water Body



Map by MV GIS 7/5/2016

6.2 ZONING DESIGNATIONS

Table 6.0 and Graph 6.1 identify and depict the different zoning designations found in the City and the acreage that exists within each of these designations as of March 1, 2016.

Table 6.2 contains a list of the City’s existing Comprehensive Plan designations and lists the zoning designation(s) that they are consistent with along with the minimum and maximum net densities allowed within each of the listed zoning designations

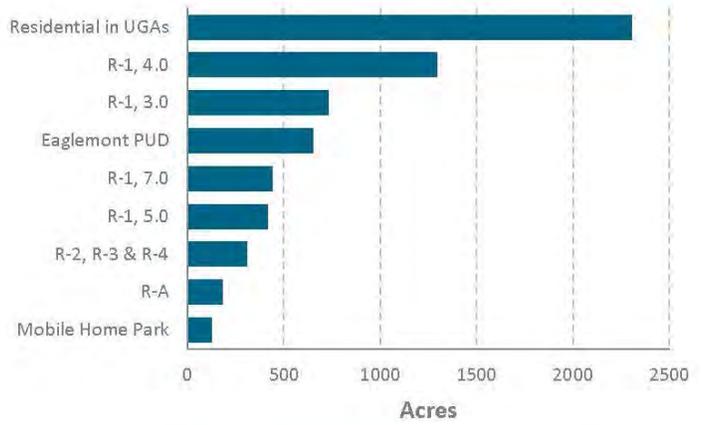
TABLE 6.0: ZONING ACREAGES

RESIDENTIAL		COMMERCIAL/INDUSTRIAL		OTHER	
Zoning Designation	Acres	Zoning Designation	Acres	Zoning Designation	Acres
Single-Family Residential (R-1, 7.0)	442	C-1	46	H-D	29
Single-Family Residential (R-1, 5.0)	418	C-2	510	Dike	4
Single-Family Residential (R-1, 4.0)	1,298	C-3	15	F-1	35
Single-Family Residential (R-1, 3.0)	731	C-4	15	R-O	2
High Density in UGA	70	C-L	416	RR	43
Medium Density in UGA	2,234	L-C	.5	Public	1376
Multi-Family Residential (R-4)	36	M-1	40	Public in UGA	8
Multi-Family Residential (R-3)	247	M-2	72	Skagit River	201
Duplex and Townhomes (R-2)	28	P-O	33	Public Rights-of-Way (City + UGAs)	1,230
Mobile Home Park (MHP)	126	C-L in UGA	66		
Residential Agricultural (R-A)	183	Commercial UGA	9		
Eagleont PUD	653				
TOTAL	6,466	TOTAL	1,222.5	TOTAL	2,928

GRAPH 6.1: ZONING/LAND USE PERCENTAGES

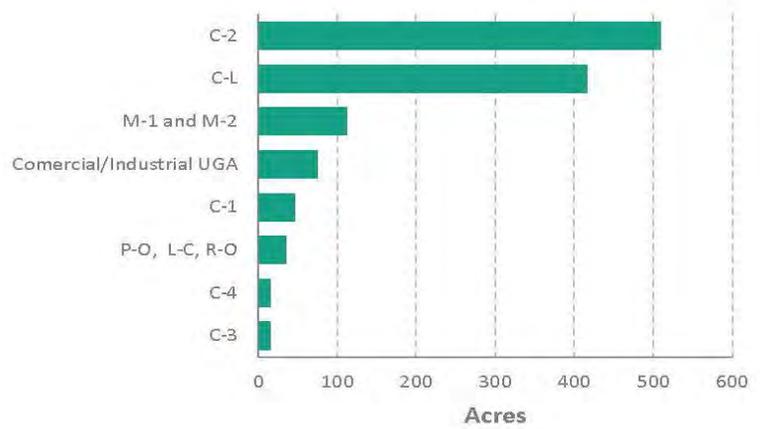
RESIDENTIAL USES

61%



COMMERCIAL & INDUSTRIAL USES

28%



OTHER USES

12%

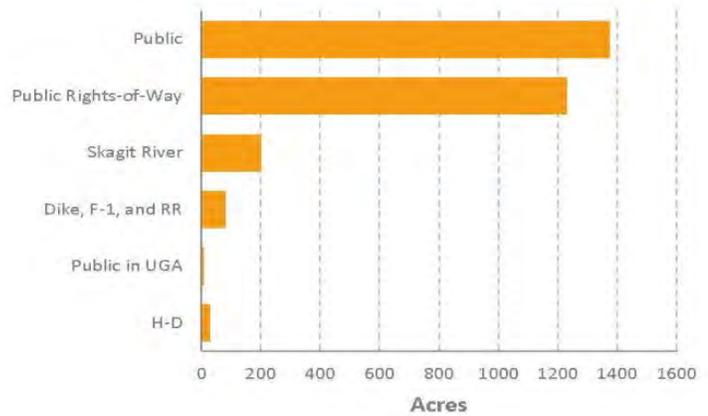


TABLE 6.2: EXISTING RESIDENTIAL ZONING DENSITIES WITH DEVELOPMENT OPTIONS⁵

ZONING DESIGNATION	COMPREHENSIVE PLAN DESIGNATION	UNDERLYING ZONING MINIMUM NET DENSITY (DU/ACRE)	UNDERLYING ZONING MAXIMUM NET DENSITY (DU/ACRE)	POTENTIAL INCREASES THROUGH TDR, PUD OR OTHER TECHNIQUE LIKE OVERLAY ZONE (YES/NO)
R-1, 7.0 ¹ Single-Family Residential	High Density Single-Family (SF-HI)	4.0	7.26	YES
R-1, 5.0 ¹ Single-Family Residential	High Density Single-Family (SF-HI)	4.0	5.73	YES
R-1, 4.0 ¹ Single-Family Residential	Medium Density Single-Family (SF-MED)	4.0	4.54	YES
R-1, 3.0 ¹ Single-Family Residential	Medium Density Single-Family (SF-MED)	3.23	3.23	OVERLAY ZONE ONLY (NO PUD OR TDR)
R-2 Two-Family Residential District	Low Density Multi-Family (MF-LO)	8.0	10	YES
R-3 Multi-Family Residential District	Medium-High Density Multi-Family (MF-MH)	10.0	12 or 15 ²	YES
R-4 Multi-Family Residential District	Medium-High Density Multi-Family (MF-MH)	10.0	15 or 20 ³	YES
R-A Residential Agricultural District ⁴	Agricultural with Density Transfer (AG)	1.24	1.24	NA

¹ A minimum net density of 4 dwelling units per acre (du/acre) is required in this zone unless documented critical areas including areas of special flood risk designation, resource lands, restriction on access or other physical site constraints limit the ability to achieve this density. Due to the unique characteristics of the existing neighborhoods identified on Map LU-5 these areas shall not have densities exceeding 3.23 du/acre; and thus are not required to meet the minimum net density of 4 du/acre.

² 15 du/acre may be achieved if at least 50% of the required parking spaces are located in an enclosed area beneath the habitable floors of the building or complex.

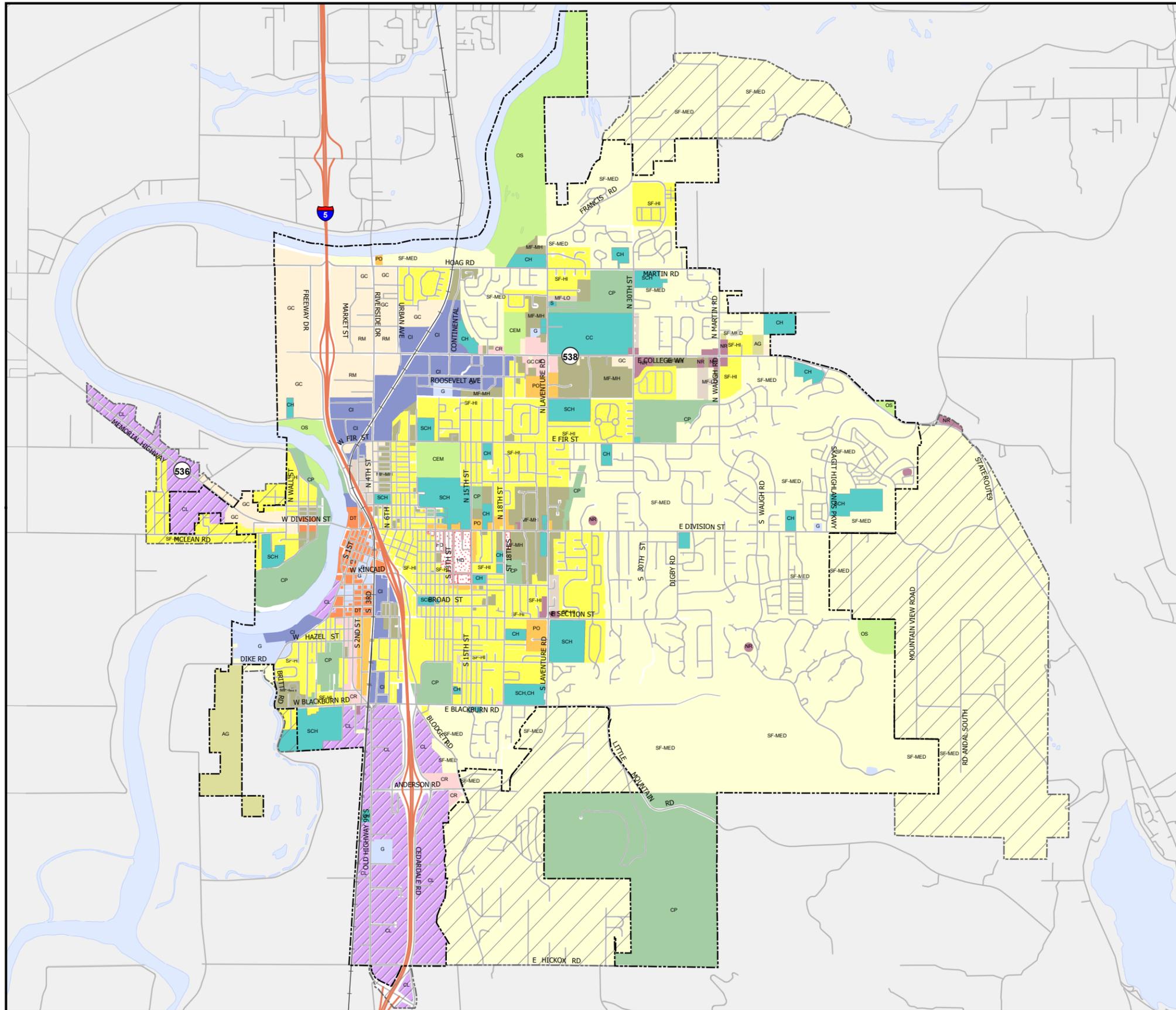
³ 20 du/acre may be achieved if at least 50% of the required parking spaces are located in an enclosed area beneath the habitable floors of the building or complex.

⁴ The City has put policies into place to require the re-designation of parcels zoned R-A where the Comprehensive Plan designation is not consistent with the zoning of the parcel.

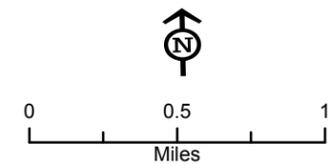
⁵ The City could adopt new zoning designations and associated development regulations following the adoption of this Element of the Comprehensive Plan consistent with Land Use Policy LU-1.1.8.

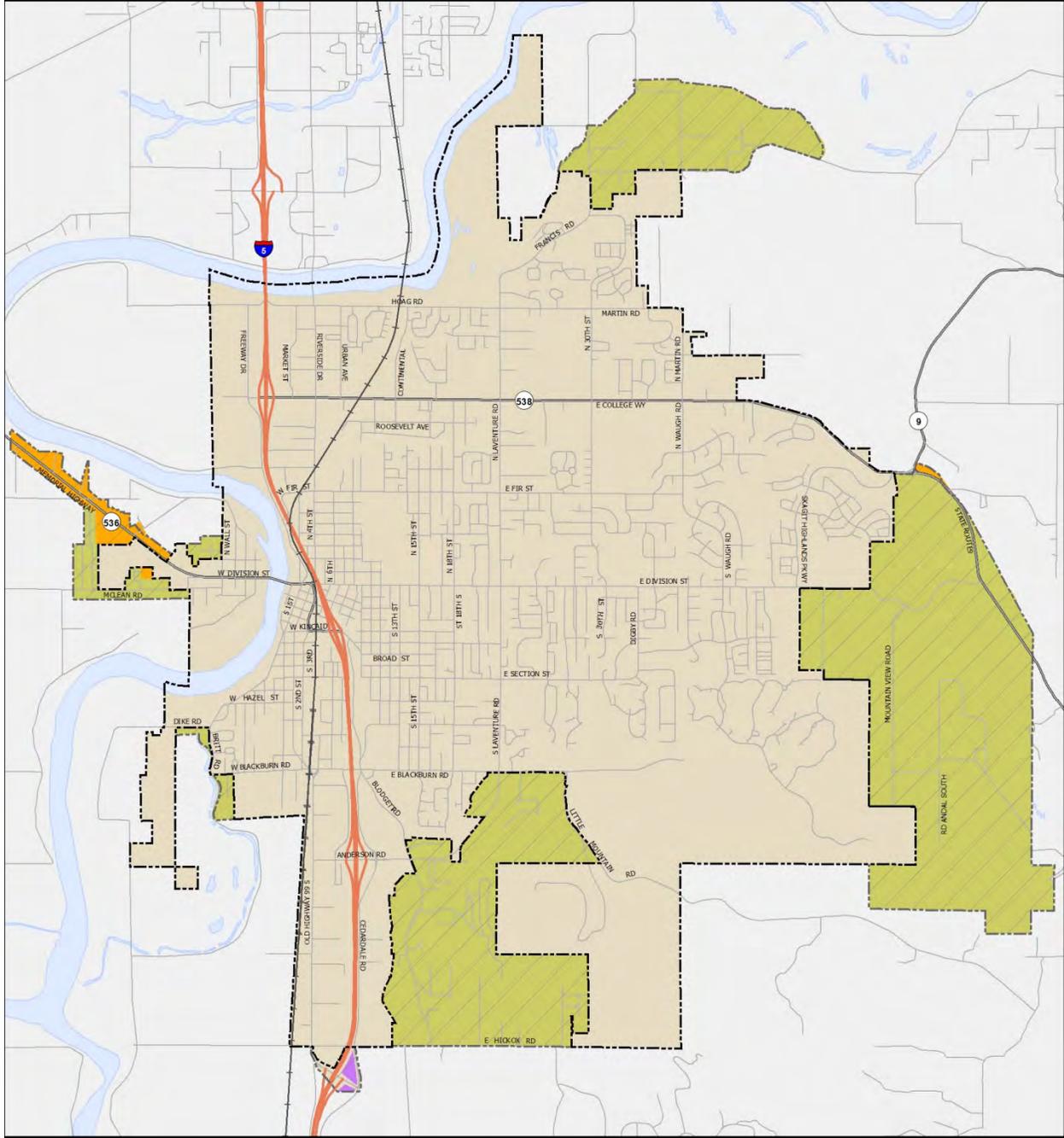
Map LU-3 identifies the existing Comprehensive Plan designations throughout the City as of January 1, 2016. Map LU-4 identifies Skagit County’s zoning designations within the City’s Urban Growth Areas (UGAs). Map LU-5 identifies areas that are zoned R-1, 3.0 that have an overlay restricting their density to a maximum of 3.23 dwelling unit per acre. This overlay means that these areas cannot be zoned to R-1, 4.0 without amending Map LU-5. [Appendix A](#) provides additional details with regard to minimum and maximum densities within the City.

**Land Use Element
Figure LU-3.0 Comprehensive Plan**



- Comprehensive Plan Designation (Associated Zoning Designation)**
- AGRICULTURAL (R-A)
 - MEDIUM DENSITY SF (R-1,3.0 or 4.0)
 - HIGH DENSITY SF (R-1,5.0 or 7.0)
 - LOW DENSITY MF (R-2)
 - MEDIUM HIGH DENSITY MF (R-3 or R-4)
 - RESIDENTIAL OFFICE/PROFESSIONAL OFFICE (RO or PO)
 - NEIGHBORHOOD RETAIL, MIXED USE CENTER (C-4)
 - COMMUNITY RETAIL, MIXED USE CENTER (C-3)
 - RETAIL MALLS AND GENERAL COMMERCIAL (C-2)
 - HEALTHCARE DEVELOPMENT (HEALTHCARE DEVELOPMENT DISTRICT)
 - DOWNTOWN RETAIL/SUPPORT COMMERCIAL (C-1)
 - COMMERCIAL/INDUSTRIAL (M-1 or M-2 or C-2)
 - COMMERCIAL/LIMITED INDUSTRIAL (C-L)
 - GOVERNMENT CENTER (P)
 - CHURCHES, COMMUNITY COLLEGE, SCHOOLS (P)
 - COMMUNITY PARK, NEIGHBORHOOD PARK (P)
 - OPEN SPACE, CEMETERY (P or F-1)
- City Boundary
 - Urban Growth Area
 - Railroad
 - Water Body

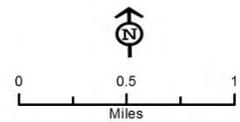




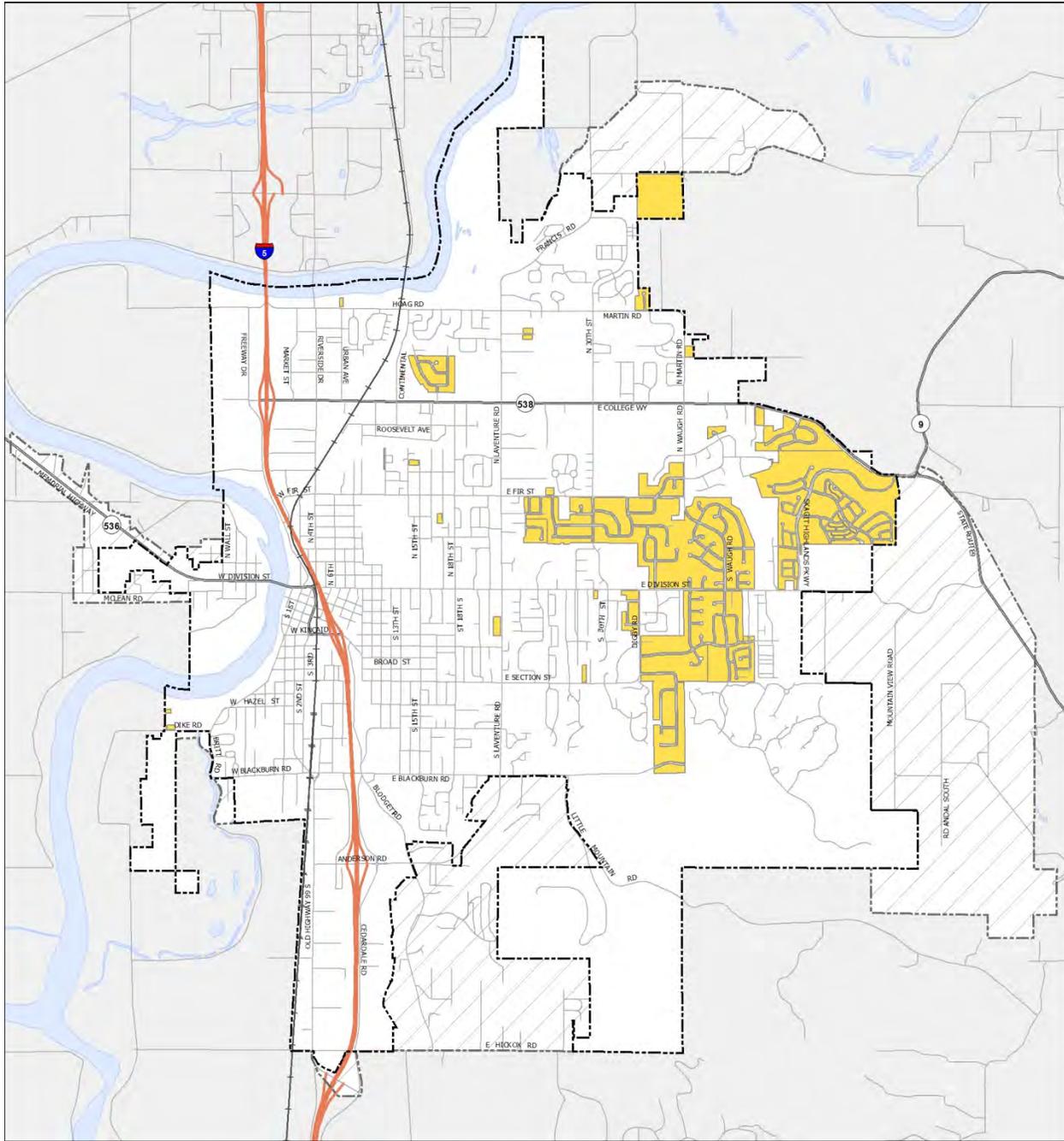
Land Use Element - Figure LU-4.0 Skagit County Zoning of UGAs



- [MV-UD] Mount Vernon UGA Urban Development District
- [URC-I] Urban Reserve Commercial Industrial
- [URR] Urban Reserve Residential
- City Boundary
- Incorporated City of Mount Vernon
- City of Mount Vernon Urban Growth Area
- Railroad
- Water Body



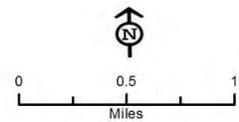
Map by MV GIS 7/5/2016



Land Use Element - Figure LU-5.0 Maximum Density Overlay Zone



- Parcels zoned R-1, 3.0 that shall have a maximum density of 3.23 dwelling units per acre
- City Boundary
- City of Mount Vernon Urban Growth Area
- Railroad
- Water Body



Map by MV GIS 7/5/2016

6.3 URBAN GROWTH AREAS

The City’s Urban Growth Areas (UGAs) are areas that the City expects to grow into overtime through the annexation process. The City has provided all of its UGAs with Comprehensive Plan designations that guide the City when determining what the zoning of property will be when the City chooses to annex it into the City.

Table 6.3 outlines the City’s Comprehensive Plan designations that have already been chosen for its UGAs, the City’s zoning that is associated with the Comprehensive Plan designations, and the Skagit County Zoning/Comprehensive Plan designation of these areas.

TABLE 6.3 UGA ZONING

CITY COMPREHENSIVE PLAN DESIGNATIONS	CITY ZONING	CORRESPONDING COUNTY ZONING
Single-Family High	Single-Family Residential R-1,5.0 or 7.0	Urban Reserve Residential (URR)
Single-Family Medium	Single-Family Residential R-1,3.0 or 4.0	Urban Reserve Residential (URR)
Commercial/Limited Industrial	Commercial/Limited Industrial (C-L)	Urban Reserve Commercial-Industrial (URC-I)
To be Determined	To be Determined	Urban Development District

Property within the City’s UGAs are not subject to the City’s development regulations until such time that they are annexed into the City. Even so, because these areas are anticipated to become part of the City at some point in time the City and County negotiated a set of development regulations specific to UGAs in 2005 that the County administers.

These UGA specific development regulations were adopted by Skagit County with Ordinance 020050007. This ordinance gives Mount Vernon the option of amending its Comprehensive Plan designations within residentially designated UGA areas to allow for a one-acre lot overlay zone if certain conditions can be met. Mount Vernon has opted not to allow such an overlay in its UGAs.

7.0

CRITICAL AREAS

Mount Vernon is home to an incredible array of natural resources. The City is located within the Skagit River watershed just six (6) miles east of Puget Sound. The Skagit River is identified as a “shoreline of statewide significance” and is a major salmon system that flows through the City along with 22 other primary streams and many wetland areas.

In 2007 the City adopted a critical areas ordinance based on, and supported by, best available science as required by the Growth Management Act (GMA).

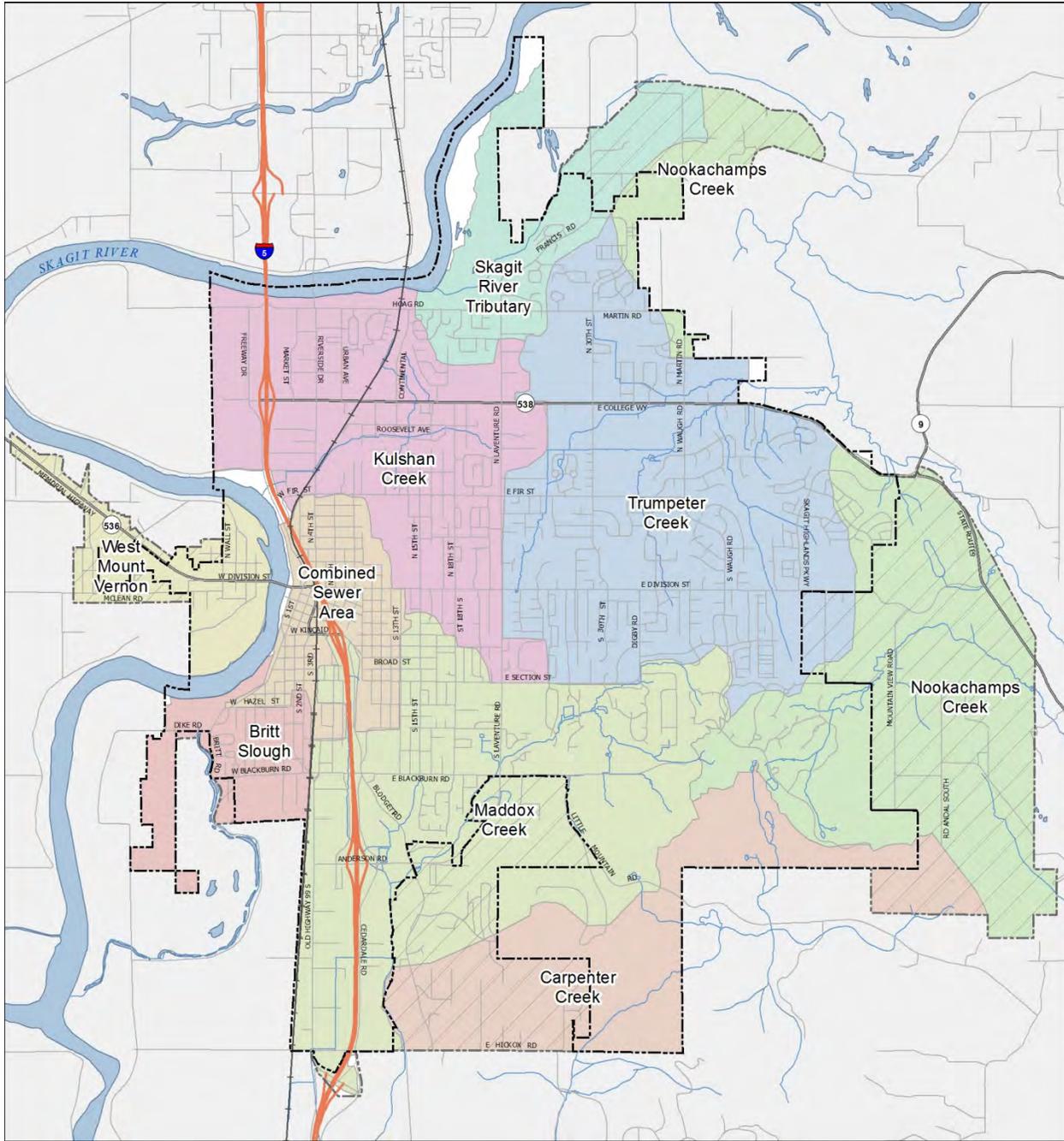


The City’s critical areas ordinance is based on the most current, preeminent science of how to preserve the functions and values of critical areas through examination of existing local conditions and the identification of critical habitat with its specific functions and values.

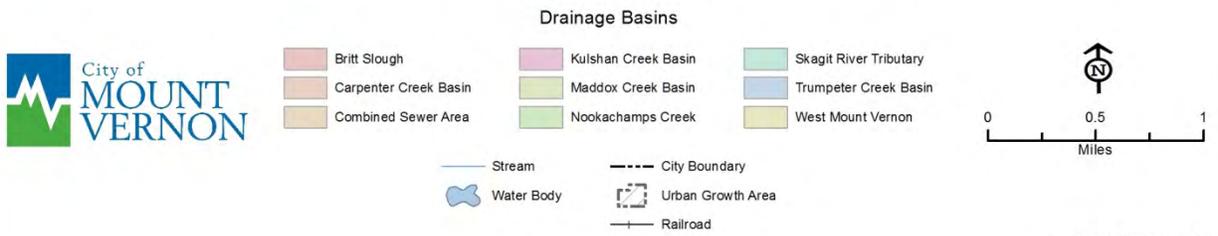
Similar to most other jurisdictions in Washington State that are administering and enforcing GMA compliant critical areas ordinances, those choosing to develop in Mount Vernon bear much greater development costs when critical areas are on or near their property due to loss of developable land to buffers, the cost of reports/analysis by qualified critical area professionals that must be prepared, and other critical area specific best management practices that are required.

Following are sub-sections that describe the different critical areas found in the City, including: streams, wetlands, priority habitat areas, floodplains, shorelines, and steep slopes.

Map 4.0 identifies the overall basins that the City has been delineated into to assist with identification of basin specific functions and values, among other characteristics.



Land Use Element - Figure LU-7.0 Hydrologic Overview



Map by MV GIS 7/5/2016

7.1 STREAMS



The Skagit River is the largest basin in the Puget Sound, and possesses the most abundant and diverse populations of salmon, steelhead trout, and bull trout in the region. It is the sixth largest drainage on the west coast of the continental United States. Major tributaries of the Skagit River include the Sauk, Baker and Cascade rivers.

Other fish bearing streams within the City include parts of: Kulshan, Trumpeter, Logan, Thunderbird, Lindgren, Kiowa, Edgemont, Carpenter, Maddox, Monte Vista, Flowers, Martha Washington, and Little Mountain (tributary to Maddox) Creeks.

The City's first stream inventory was completed in 2001 and has been updated a number of times with the last major update in 2008. These inventories and mapping enable the City to determine when additional site specific review is necessary when development is proposed; and they provide information on a number of physical attributes such as fish presence, hydrology, the existence of culverts, et cetera.

“Wild Salmon did not become endangered or threatened overnight. Their plight is the result of many decades of decline caused by more than a century of activities in a growing state. But just as the cumulative actions has damaged the prospects for wild salmon survival, the cumulative benefit of new decisions and actions can work to save wild salmon”

- The State of the Salmon Report., former Washington State Governor Gary Locke

There are 22 distinct streams in the City that extend approximately 25 miles within the City limits with an additional approximate 11 miles that extends through the City's Urban Growth Areas (UGA).

The Skagit River drains an area of 3,140 square miles, and flows for 162 miles from its headwaters in the Cascade Mountains in the United State and Canada, through low-lying valleys, and finally through the broad Skagit delta to Skagit Bay, which is located in Puget Sound.

7.2 WETLANDS



Wetlands help to maintain water quality, store and convey stormwater and floodwater, recharge groundwater, provide important fish and wildlife habitat, and serve as areas for recreation, education, scientific study and aesthetic appreciation.

The City had reconnaissance level wetland mapping done by Shannon & Wilson (S&W) in 2000. The S&W wetland mapping is a compilation of soil information from the U.S. Soil Conservation Service, the National Wetland Inventory maps, the Department of Natural Resources mapping, and a handful of actual delineation reports that had been previously submitted to the City, aerial photography and windshield surveys by S&W biologists.



Additionally, the City collects and saves wetland reconnaissance and delineation reports submitted as part of development projects and uses these as background information when reviewing new projects.

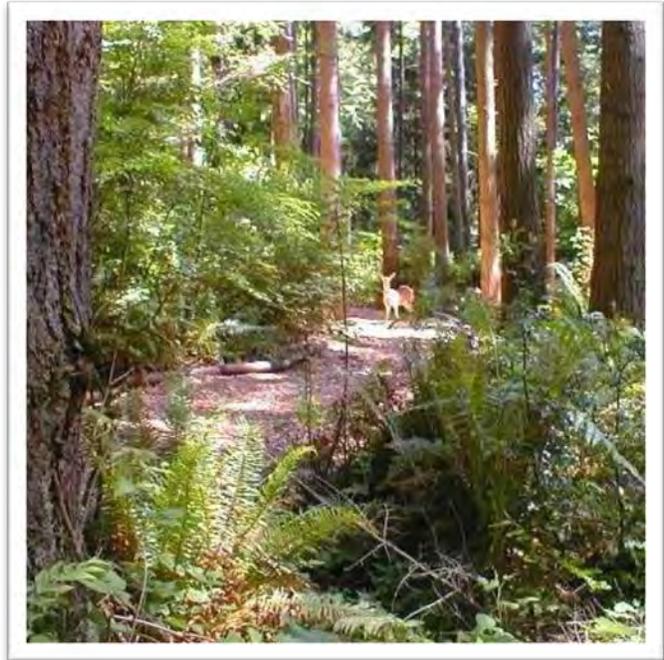
The City has one (1) wetland mitigation bank located in the northern portion of the City. In its entirety this bank is approximately 310 acres in size (a portion of the bank is located outside of the City's corporate boundaries). The Washington State Department of Ecology approved this bank in 2009.



7.3 PRIORITY HABITAT AREAS

In addition to streams, riparian areas, and wetlands, the City of Mount Vernon and its UGA contain habitats supporting other wildlife species.

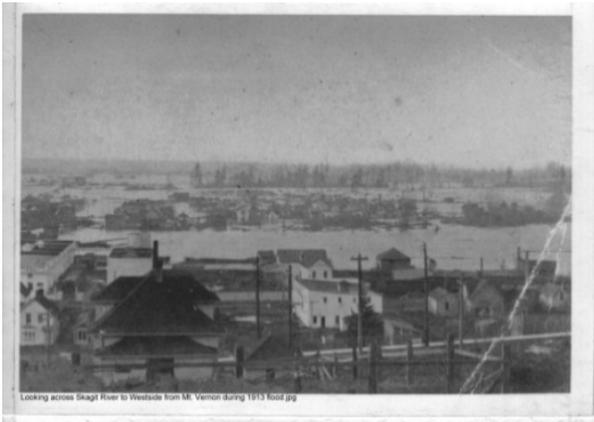
A key source of information about wildlife, including those endangered, threatened, and sensitive, is available from the Washington State Department of Fish and Wildlife (WDFW) Priority Habitat and Species (PHS) Program. Through this program the State provides information on fish and wildlife habitat location, and priorities for species and habitat management and conservation, including measures to protect resources as land use decisions are made. WDFW uses the information to screen forest practices permits and SEPA reviews, for landscape planning and ecosystem management, and other purposes. It is a source of information for GMA planning efforts by counties and cities as well.



The City's current development regulations state that priority habitat for the protection of fish and wildlife include: federally or state listed threatened, endangered, or sensitive or priority species or those proposed for listing, or outstanding potential habitat for those species, large blocks of habitat extending outside the City limits and providing a travel corridor for those species, and areas adjacent or contiguous with wetlands and streams which enhance the value of those areas for fish and wildlife.



7.4 FLOOD AREAS



Looking across Skagit River to Westside from Mt. Vernon during 1913 flood.jpg

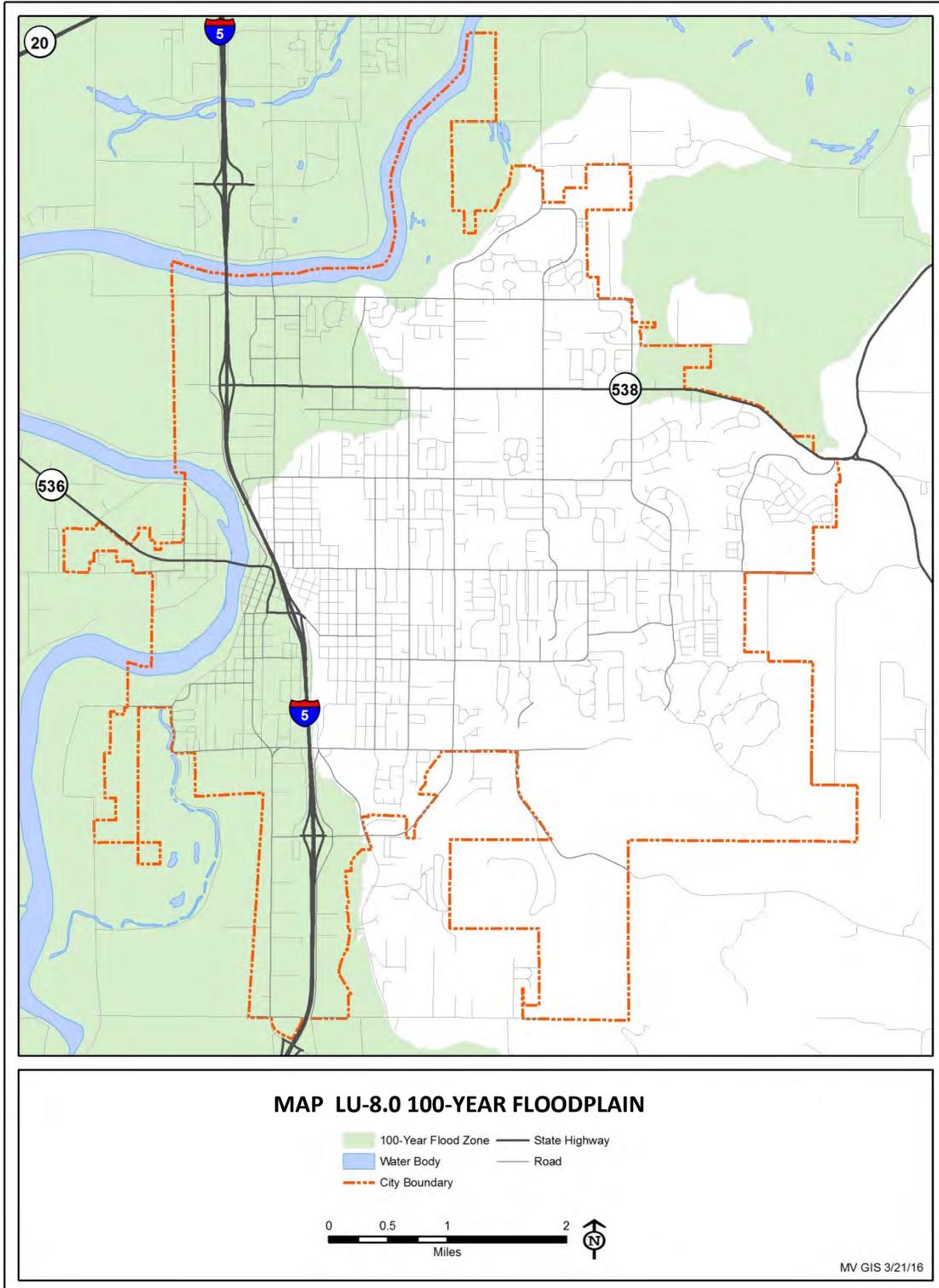
The City utilizes maps created by the Federal Emergency Management Agency (FEMA), which are called Flood Insurance Rate Maps (FIRM) to determine where flood areas are located and what the minimum elevation requirement for structures needs to be. The location of these areas is shown on Map 5.0.

The City recognizes that flooding of the Skagit River continues to cause damage to the land and critical infrastructure of communities along the Skagit River. Human life, transportation infrastructure, natural resources, commercial and industrial areas, and private property are at risk each flood season. The City is working towards finding cost effective, long term and environmentally responsible methods to reduce the risk from flood damage.

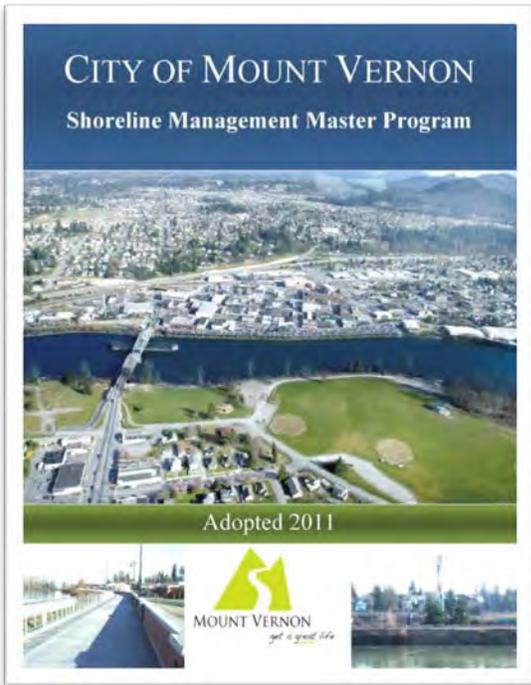
The City is aware of the importance of working together with Skagit County, other cities, and the diking and drainage districts to coordinate and fund the development and implementation of measures to reduce flood hazards.



Top photo courtesy of the Skagit County Historical Museum – showing the City’s 1913 flood event looking across the Skagit River to the west side of Mount Vernon. Middle photo is from a flood event in 2003 taken from the west side of Mount Vernon looking at Edgewater park. The bottom photo is from a 2006 flood event and is taken looking south down the Skagit River near Main Street.



7.5 SHORELINES



Mount Vernon initiated development of a city Shoreline Management Program (SMP) in early 2009 and the final SMP was adopted by City Council in July of 2011. Up to this time the City had used Skagit County's SMP to regulate activities within areas of SMP jurisdiction.

Mount Vernon's new SMP or "Master Program" consists of environmental designations for the shoreline segments and goals, policies, and regulations applicable to uses and modifications within the Shoreline Management Zone. Appendices to the SMP include an inventory of existing shoreline conditions; analysis and characterization of the shorelines of the city; a cumulative impacts report; a shorelines restoration planning report; shoreline wetland regulations; and a compilation of resources available.

7.6 STEEP SLOPES

Digital orthophotographic mapping was created for the City in the summer of 2000 by Entranco and Triathlon Mapping. This mapping was then used to create topographic maps for the City. The City requires detailed topographic mapping when development applications are submitted for areas that have slopes in excess of ten percent (10%) or where there are suspected land slide hazards.

9.0

SUB-AREA PLANS

Because the Comprehensive Plan is designed to provide broad policy direction it is appropriate to take a close look at individual areas around the City to define their specific needs.

To date, the following sub-area plans have been created and are attached to this Element:

- A) Downtown Planning Area;
- B) North 4th Street / Hill / Division Street Planning Area;
- C) Mall / College Way Planning Area;
- D) West Mount Vernon Planning Area;
- E) South Mount Vernon Sub-Area Plan;
- F) Historic / Cultural Architectural Conservation District(s);
- G) Interstate-5 Corridor and City Entry System;
- H) Healthcare Development Sub-Area Plan; and,
- I) South Third Street Sub-Area Plan.

The City will be completing or amending sub-area plans for the following areas after the 2016 Comprehensive Plan update:

- J) College Way Planning Area;
- K) Downtown Entry Corridor Planning Area;
- L) Interstate-5 Corridor;
- M) Healthcare Development Sub-Area Plan;
- N) Area west of Interstate-5 between Kincaid and East Blackburn;
- O) Area between Interstate-5 and Riverside Drive between East College Way and Fir Street;
- P) Area surrounding the Skagit Valley College; and,
- Q) Areas surrounding East College Way between LaVenture and Waugh Roads.

GENERAL LAND USE GOALS, OBJECTIVES AND POLICIES

GOAL LU-1 ENHANCE THE QUALITY OF LIFE FOUND IN THE CITY OF MOUNT VERNON AS A PLACE TO WORK, LIVE AND RECREATE.

OBJECTIVE LU-1.1 Balance residential, commercial, industrial and public land uses within the City.

- Policy LU-1.1.1** Maintain the use of the Design Guidelines to achieve attractive new residential developments within the City. Create new Design Guidelines to promote attractive new office, retail, commercial and industrial developments within the City.
- Policy LU-1.1.2** Maintain zoning and subdivision regulations to ensure that adequate setbacks, landscaping and buffering are required where land use impacts occur between residential uses of different intensities; along with residential and non-residential uses.
- Policy LU-1.1.3** Provide adequate capacity for the City's projected residential growth and provide enough commercial/industrial areas within the City to balance residential growth.
- Policy LU-1.1.4** Allow planned multi-family housing throughout the City in residential and commercial zoning designations through processes such as the Planned Unit Development, other types of overlay zones, or with new subarea plans.
- Policy LU-1.1.5** Integrate non-residential uses such as parks, social and religious uses, where appropriate, into residential neighborhoods to create communities that have a full range of public facilities and services. These non-residential uses shall be sited, designed, and scaled to be compatible with the existing residential character.
- Policy LU-1.1.6** Encourage infill development on vacant properties with existing public services and public utilities.
- Policy LU-1.1.7** Public transportation transit stops constructed as part of a development shall be safe, clean, comfortable, and attractive.
- Policy LU-1.1.8** Consider adopting new zoning designations or amending the development regulations associated with existing zones to encourage the development of affordable housing in residential and commercial areas of the City.

OBJECTIVE LU-1.2 Maintain and enhance the character of existing single-family neighborhoods but not preclude redevelopment and/or new development within established neighborhoods.

Policy LU-1.2.1 Provide development regulations that create a compatible pattern of development within established neighborhoods. The development standards shall address densities, building setbacks, parking and landscaping.

OBJECTIVE LU-1.3 Foster business creation and retention and contributes to the quality of life of the citizens of the City of Mount Vernon.

Policy LU-1.3.1 Provide adequate land for commercial and industrial development that provides jobs and augments the City's tax base.

Policy LU-1.3.2 Ensure zoning regulations accommodate a range of allowable businesses, commercial and industrial uses in appropriate locations throughout the City.

Policy LU-1.3.3 Review on a regular basis existing development regulations to remove unnecessary requirements that unnecessarily hinder the development process.

GOAL LU-2 PROVIDE FOR ORDERLY DEVELOPMENT WITHIN THE CITY OF MOUNT VERNON THAT IS CONSISTENT WITH ADOPTED PLANS AND DEVELOPMENT REGULATIONS.

OBJECTIVE LU-2.1 Implement the Comprehensive Plan Land Use Map.

Policy LU-2.1.1 Designate land for housing, commerce, recreation, public utilities and facilities and other land uses on the official Comprehensive Plan Land Use Map.

Policy LU-2.1.2 Update on a yearly basis the official Comprehensive Plan Land Use Map, as appropriate.

Policy LU-2.1.3 Ensure that the yearly updates to the Comprehensive Plan map and text are accompanied by changes to development regulations and the zoning map, so that these items are consistent.

Policy LU-2.1.4 Each year when the Comprehensive Plan is updated an inventory of new public uses such as Churches, Parks, Cemeteries, and Schools that have been allow as conditional or special uses shall be completed and these areas shall be redesigned with the appropriate Comprehensive Plan designation and rezoned as Public (P).

OBJECTIVE LU-2.2 Establish densities and development standards that provide for efficient infrastructure and service delivery.

- Policy LU-2.2.1 Have development regulations that allow the use of Planned Use Developments (PUDs). PUDs shall provide for open spaces and protection of critical areas, shall offer a diversity of housing types and affordability and shall incorporate the adopted Design Guidelines.
- Policy LU-2.2.2 Coordinate transportation and utility improvement projects with the Land Use Element and the Capital Improvements Plan for the City.

GOAL LU-3 IDENTIFY, PRESERVE AND ENHANCE THE CULTURAL RESOURCES AND HISTORIC SITES WITHIN THE CITY OF MOUNT VERNON.

OBJECTIVE LU-3.1 Support visual, literary and cultural arts and activities with the community.

- Policy LU- 3.1.1 Encourage use of regional and community facilities like the Lincoln Theatre and MacIntre Hall for cultural activities to maximize their use and to expand public access to cultural opportunities.
- Policy LU-3.1.2 Work with other organizations to promote visual, literary and cultural arts and events in the community.
- Policy LU-3.1.3 Maintain an Arts Commission for the promotion of cultural arts in the community.
- Policy LU-3.1.4 Encourage local activities that promote the community's history.

OBJECTIVE LU-3.2 Identify historic buildings and landmarks within the City.

- Policy LU-3.2.1 Coordinate with community organizations, property owners and local citizens to identify and/or restore historic properties.

GOAL LU-4 PROVIDE A PROCESS FOR THE IDENTIFICATION AND SITING OF ESSENTIAL PUBLIC FACILITIES.

OBJECTIVE LU-4.1 Allow for the appropriate siting of essential public capital facilities of a Statewide or Countywide nature.

- Policy LU-4.1.1 The applicant for a proposal to site an essential public facility shall provide a justifiable need for the public facility based upon forecasted need and a logical service area.
- Policy LU-4.1.2 Through the zoning code, the City shall prepare siting criteria for essential public facilities.
- Policy LU-4.1.3 Any site selected as an essential public facility shall have Comprehensive Plan and zoning designations of Public (P) and an overall Master Plan shall be prepared and accepted by both the City Planning Commission and City Council.

Policy LU-4.1.4 In approving essential public facilities, the effect on adjacent uses and/or neighborhoods and methods to mitigate all impacts shall be considered in the approval process.

SINGLE-FAMILY RESIDENTIAL DISTRICT GOALS, OBJECTIVES AND POLICIES

GOAL LU-5 ENHANCE AND IMPROVE THE QUALITY OF SINGLE-FAMILY LIVING ENVIRONMENTS THROUGHOUT THE CITY.

OBJECTIVE LU-5.1 Ensure that new development in the single-family residential designations are designed to provide quality homes and neighborhoods for residents and take care to mitigate impacts of new development on existing neighborhoods.

Policy LU-5.1.1 A minimum net density of 4.0 dwelling units per acre for Single Family Residential neighborhoods shall be implemented unless: sensitive areas are documented on the site, it can be shown that sensitive areas near the site will be adversely affected with the proposed development, where designated resources lands exist, where areas are designated as special flood risk areas, where access is restricted, where other physical site constraints limit the number of lots that could be created, or where the existing neighborhoods identified on Map LU-5 would be negatively impacted. The neighborhoods identified on Map LU-5 shall not have a net density of greater than 3.23 dwelling units per acre.

Policy LU-5.1.2 Net development densities for Planned Unit Development (PUD) subdivision proposals and subdivision proposals where the transfer (purchase) of development rights (TDR) are proposed may be permitted to have an increase in density.

- Policy LU-5.1.3 Support site plans for new residential developments that transition to and blend with existing development patterns using techniques such as lot size, depth and width, access points, building location setbacks, and landscaping. Sensitivity to unique features and differences among established neighborhoods should be reflected in site plan design. Interpret development standards to support coordinated structural design, private yards and substantial common space areas.
- Policy LU-5.1.4 The use of the PUD and TDR ordinances shall be discretionary by the City. PUDs allow for flexibility in standard development regulations in exchange for higher level design and public benefit through the amenities that are included within the PUD development. The PUD and TDR development regulations will only be allowed if neighborhood compatibility parameters can be met with the proposed subdivision.
- Policy LU-5.1.5 New plats proposed at higher densities than adjacent neighborhood developments may be required to reduce their overall allowed density to mitigate conflicts between old and new development patterns.
- Policy LU-5.1.6 Zoning and subdivision regulations should ensure adequate setbacks, landscaping, and buffering when development of different types of housing are proposed abutting one another.
- Policy LU-5.1.7 Encourage re-investment and rehabilitation of existing housing.
- Policy LU-5.1.8 Interpret development standards to support plats designed to incorporate vehicular and pedestrian connections between plats and neighborhoods.
- Policy LU-5.1.9 Support projects that create neighborhoods with diverse housing types that achieve continuity through the organization of roads, sidewalks, blocks, setbacks, community gathering places, and amenity features.
- Policy LU-5.1.10 Support residential development incorporating a hierarchy of streets. Street networks should connect through the development to existing streets, avoid “cul-de-sac” or dead end streets, and be arranged in a grid street pattern (or a flexible grid street system if there are environmental constraints).

Policy LU-5.1.11	A range and variety of lot sizes and building densities should be encouraged throughout the City.
Policy LU-5.1.12	Create and encourage development regulations that encourage in-fill development such as accessory dwelling units (ADUs) or zero lot line developments.
Policy LU-5.1.13	Non-residential structures, such as community recreation buildings, that are part of a development, may have dimensions larger than residential structures, but shall be compatible in design and dimensions with surrounding residential development.
Policy LU-5.1.14	Non-residential structures should be clustered and connected within the overall development through the organization of roads, blocks, yards, focal points, and amenity features to create a neighborhood.
Policy LU-5.1.15	Mixed-use development in the form of limited commercial development, or other non-residential structures (not listed as permitted, accessory or conditional uses within the zoning code for the R-1 district), may be allowed within the single-family zones through a planned process such as a P.U.D or other type of overlay zone.
Policy LU-5.1.16	Evaluate fully developed neighborhoods designated Single-Family Residential High Density (SF-HI) to consider a lower density zoning overlay where existing developed conditions are lower density and the neighborhood is not in transition.

MULTI-FAMILY RESIDENTIAL DISTRICT GOALS, OBJECTIVES AND POLICIES

GOAL LU-6 ENHANCE AND IMPROVE THE QUALITY OF MULTI-FAMILY LIVING ENVIRONMENTS THROUGHOUT THE CITY THAT PROVIDE AREAS THAT OFFER A LARGER RANGE OF HOUSING OPTIONS IN THE FORM OF MULTI-FAMILY UNITS.

OBJECTIVE LU-6.1 Ensure that development in the multi-family residential designations are designed to provide quality homes and neighborhoods for residents and to mitigate impacts to existing neighborhoods as new ones develop.

Policy LU-6.1.1	The net development density in the multi-family residential designations can be increased as outlined in the zoning regulations associated with each designation.
Policy LU-6.1.2	Multi-family residential designations should be in areas of the City where infrastructure is adequate to handle impacts from higher density uses.

- Policy LU-6.1.3 Due to increased impacts to privacy and personal living space inherent in higher density living environments, new development shall be designed to create a high quality living environment with ample public open spaces within a walkable urban context.
- Policy LU-6.1.4 Evaluate project proposals in residential multi-family designations to consider the transition to lower density uses where multi-family sites abut lower density zones. Setbacks may be increased, heights reduced, and additional landscape buffering required through site plan review.
- Policy LU-6.1.5 New multi-family residential projects should demonstrate provisions for an environment that contributes to a high quality of life for future residents, regardless of income level.

RESIDENTIAL AGRICULTURAL DISTRICT GOALS, OBJECTIVES AND POLICIES

GOAL LU-7 ALLOW THE R-A ZONING TO CONTINUE ONLY IF THE PARCEL HAS A COMPREHENSIVE PLAN DESIGNATION OF AGRICULTURAL (AG).

OBJECTIVE LU-7.1 Actively pursue the rezoning of property zoned R-A to make those properties consistent with their respective associated Comprehensive Plan designations.

- Policy LU-7.1.1 R-A zoned property shall be rezoned to be consistent with their Comprehensive Plan designations any time a development application for anything other than one (1) single-family home or accessory use per lot is proposed.
- Policy LU-7.1.2 One single-family home or accessory building may be constructed on a parcel zoned R-A without requiring a rezone to another designation if the zoning and Comprehensive Plan designations are not consistent with each other.

OFFICE/RETAIL/COMMERCIAL/INDUSTRIAL DISTRICT GOALS, OBJECTIVES AND POLICIES

GOAL LU-8 SUPPORT EXISTING BUSINESSES AND PROVIDE A DYNAMIC BUSINESS ENVIRONMENT FOR NEW COMMERCIAL AND INDUSTRIAL ACTIVITIES THAT ENHANCE THE CITY’S EMPLOYMENT AND TAX BASE WHILE PROVIDING WELL PLANNED AND ATTRACTIVE FACILITIES.

OBJECTIVE LU-8.1 Develop and implement an Economic Development Element for the Comprehensive Plan.

- Policy LU-27.1.1 Support methods of increasing accessibility to commercially zoned areas for both automobile and transit to support the land uses proposed for the district.
- Policy LU-8.1.2 Private/public partnerships should be encouraged to provide infrastructure development, transportation facilities, public uses, and amenities.
- Policy LU-8.1.3 Residential uses are allowed in the C-1, C-3 and C-4 zoning designations if the criteria for such uses, as outlined within the zoning code for each district, are met. In all other commercial or industrial zoning designations residential uses are allowed if a mixed-use overlay is adopted for a site or if the use is classified as an accessory use such as a watchman, custodian, manager or property owner as specified within each associated zoning district’s regulations.

OBJECTIVE LU-8.2 Ensure that office, retail, commercial or industrial development is attractive and blends with the surrounding areas.

- Policy LU-8.2.1 Support development plans that incorporate the following features:
 - A) Shared access points and fewer curb cuts;
 - B) Internal circulation among adjacent parcels;
 - C) Shared parking facilities;
 - D) Centralized signage; and
 - E) Unified development concepts.
- Policy LU-8.2.2 Development within defined sub-area plans will be subject to additional design guidelines as delineated in the sub-area plans developed in the future for each center.
- Policy LU-8.2.3 Public amenity or amenities for customers and employees such as plazas and recreation areas should be encouraged as part of new development or redevelopment.
- Policy LU-8.2.4 Parking areas should be landscaped especially along public or private roadways, to reduce visual impacts.

Policy LU-8.2.5	In areas developed with predominantly office uses, circulation within the site should be primarily pedestrian-oriented.
Policy LU-8.2.6	Development should be designed to mitigate potential adverse impacts on adjacent properties with different zoning designations (i.e., residential or public zoning). Careful consideration of impacts from lighting, landscaping, and setbacks should all be evaluated during site design.
Policy LU-8.2.7	Landscaping along arterials should be uniform from parcel to parcel to further the visual cohesiveness of the area.
Policy LU-8.2.8	On-site landscaping should primarily be located at site entries, in front of buildings, and at other locations with high visibility from public areas.
Policy LU-8.2.9	Vehicular connections between adjacent parking areas are encouraged and incentives should be offered to encourage shared parking.
Policy LU-8.2.10	Site design for office uses, commercial, and mixed-use developments should consider ways of improving transit ridership through siting, locating of pedestrian amenities, walkways, parking, etc.

NEIGHBORHOOD RETAIL, MIXED USE CENTER (C-4 ZONING CODE) DISTRICT GOALS, OBJECTIVES AND POLICIES

GOAL LU-9: TO MINIMIZE POTENTIAL NOISE IMPACTS TO THE SURROUNDING RESIDENTIAL NEIGHBORHOOD ALL NON-RESIDENTIAL USES SHOULD BE CLOSED FOR BUSINESS AT REASONABLE TIMES.

GOAL LU-10: DEVELOPMENT REGULATIONS SHALL BE ADOPTED TO REDUCE THE NEGATIVE VISUAL, NOISE, ODOR, AND EXHAUST IMPACTS FROM GARBAGE AND RECYCLING RECEPTACLES, LOADING DOCKS, AND DRIVE THROUGH LANES.

GOAL LU-11: PROVIDE A NETWORK OF LOGICAL, SAFE, CONVENIENT, ATTRACTIVE, AND COMFORTABLE PEDESTRIAN NETWORKS ON SIDEWALKS AND TRAILS, TO AND FROM ACCESS POINTS, THROUGH PARKING LOTS TO PLANNED BUILDING ENTRANCES OR OTHER SITE AMENITIES SUCH AS PUBLIC OPEN SPACES TO REINFORCE PEDESTRIAN ACTIVITY BETWEEN THE COMMERCIAL DEVELOPMENT AND THE SURROUNDING RESIDENTIAL NEIGHBORHOODS.

OBJECTIVE LU- 11.1: Ensure that a pedestrian network is provided that connects the commercial, residential, and open space uses. This network shall consist of trails, pathways, and widened sidewalks. The commercial uses are intended to primarily serve their surrounding residential areas; and these residents should be able to walk or bike to these areas.

GOAL LU-12: DEVELOPMENT REGULATIONS SHALL BE ADOPTED TO REDUCE THE APPARENT MASS OF LARGER COMMERCIAL BUILDINGS, TO PROVIDE VISUAL INTEREST, AND TO HELP BLEND INTO THE RESIDENTIAL NEIGHBORHOODS IN WHICH THEY ARE LOCATED.

GOAL LU-13: ENSURE THAT COMMERCIAL BUILDINGS ARE IN SCALE WITH THE SURROUNDING RESIDENTIAL NEIGHBORHOODS.

GOAL LU-14: DEVELOPMENT REGULATIONS SHALL BE ADOPTED THAT ENSURE THAT MECHANICAL EQUIPMENT, VAULTS, AND OUTDOOR STORAGE ARE SCREENED TO ENHANCE THE APPEARANCE OF THE COMMERCIAL BUILDINGS WITHIN THE NEIGHBORHOOD COMMERCIAL ZONE.

GOAL LU-15: DEVELOPMENT REGULATIONS SHALL BE ADOPTED THAT BALANCE SAFETY AND SECURITY AND THE RESIDENTIAL NATURE IN WHICH COMMERCIAL USES IN THE C-4 ZONE ARE LOCATED.

CRITICAL AREAS GOALS, OBJECTIVES AND POLICIES

GOAL LU-16 RETAIN AND ENHANCE THE EXISTING NATURAL FEATURES AND SENSITIVE AREAS THAT ARE ESSENTIAL TO A HIGH QUALITY OF LIFE IN THE COMMUNITY OF MOUNT VERNON.

OBJECTIVE LU-16.1 Meet GMA requirements for designation and protection of critical areas in the context of Mount Vernon's community vision for growth management.

Policy LU-16.1.1 The Skagit River will be one of the major natural features affecting development, and it also provides opportunities for increased public access and activity. The dikes, notwithstanding potential legal problems, provide an important community resource for public trails extending beyond Mount Vernon into Skagit County.

Policy LU-16.1.2 Downtown and the West Side of Mount Vernon are the most logical areas to concentrate direct river access, enhancement efforts and river-oriented activities.

- Policy LU-16.1.3 With development regulations, support retention of natural areas and include design criteria to achieve subdivision and site layouts which will be sensitive to the environmental constraints and optimize open space and views. Key areas of consideration and emphasis for development include:
- Steep slopes;
 - Streams with associated wetlands;
 - Habitat areas; and,
 - Natural vegetation.
- Programs should be expanded for non-detrimental access to these areas and opportunities for interpretation and education be provided.

OBJECTIVE LU-16.2 Preserve open space, sensitive resources and maintain varied uses.

- Policy LU-16.2.1 Provide public access and recreation opportunities, where appropriate.

GOAL LU-17 IDENTIFY CRITICAL AREAS AS DEFINED IN RCW 36.70A.030 THAT INCLUDE: FLOODWAYS OF 100 YEAR FLOODPLAINS; LANDSLIDE, EROSION, AND SEISMIC HAZARDS, INCLUDING STEEP SLOPES OVER 40 PERCENT; WETLANDS AND THEIR PROTECTIVE BUFFERS; STREAMS AND THEIR PROTECTIVE BUFFERS; CRITICAL AQUIFER RECHARGE AREAS; AND FISH AND WILDLIFE HABITAT CONSERVATION AREAS.

- Policy LU-17.1.1 Maintain an up-to-date inventory of environmentally sensitive areas including descriptions of criteria for designation and maps. The inventory of environmentally sensitive areas should be reviewed and updated regularly based upon changing conditions or new information. The final identification of environmentally sensitive or critical areas, hazardous sites or portions of sites should be established during the review of project proposals.
- Policy LU-17.1.2 Consider the best available science to determine critical area buffers and maintain achievable ecological functions of those buffers. Use easements or equivalent protective measures to protect critical areas and critical area buffers that are not protected through public ownership.
- Policy LU-17.1.3 Use acquisition, enhancement, regulations, and incentive programs independently or in combination with one another to protect and enhance critical area functions.

- Policy LU-17.1.4 Consider allowing alterations to critical areas, after all ecological functions are evaluated, the least harmful and reasonable alternatives are identified, and affected significant functions are appropriately mitigated, to:
- Maintain and improve a critical area; or,
 - Avoid denial of reasonable use of the property; or
 - Meet other priority growth management goals and programs consistent with GMA and the City Comprehensive Plan.
- Policy LU-17.1.5 Establish mitigation priorities such as impact avoidance, impact minimization, and compensation in critical area regulations. Mitigation sites should be located strategically to alleviate habitat fragmentation.
- Policy LU-17.1.6 Provide incentives to private land owners, and develop City or inter-jurisdictional programs, designed to protect ecological functions for streams, riparian area, and wetlands.
- Policy LU-17.1.7 Review adopted clearing and grading regulations and revise them to address critical area protection. These regulations should set seasonal clearing restrictions that limit clearing and grading activities during the rainy seasons. Critical areas, including sloped and riparian areas, should not be exposed during this time.
- Policy LU-17.1.8 Grading and construction activities should implement erosion control Best Management Practices and other development controls as necessary to reduce sediment and pollution discharge from construction sites to minimal levels.
- Policy LU-17.1.9 Encourage the use of native plants in landscaping requirements, erosion control projects, and the restoration of stream banks, lakes, shorelines and wetlands.
- Policy LU-17.1.10 Expand programs for non-detrimental access to critical areas and provide opportunities for interpretation and education.

GOAL LU-18 MAINTAIN, AND IMPROVE WHERE POSSIBLE, WATER QUALITY.

- Policy LU-18.1.1 Require adequate erosion and sedimentation controls from new construction sites.
- Policy LU-18.1.2 Require adequate water controls for new development.
- Policy LU-18.1.3 Implement public education programs to reduce the source of pollutants entering surface waters.

GOAL LU-19 DEVELOP A CONTINUOUS AND COMPREHENSIVE PROGRAM FOR MANAGING SURFACE WATER.

- Policy LU-19.1.1 Ensure funding source(s) for program implementation.
- Policy LU-19.1.2 Coordinate the City program with the Skagit County Program.
- Policy LU-19.1.3 Develop a network of publicly-owned or preserved natural open space for protecting environmentally sensitive land, creating a sense of openness, provide scenic views and provide space for trail systems.

GOAL LU-20 PROTECT PUBLIC HEALTH, SAFETY, AND PROPERTY FROM THE EFFECTS OF NATURAL HAZARDS. PROVIDE FOR AN INCREASED LEVEL OF SAFETY TO THE CITIZENS OF MOUNT VERNON, AND PROVIDE FOR AN INCREASED LEVEL OF PROTECTION FOR PUBLIC INFRASTRUCTURE.

- Policy LU-20.1.2 Protect Life and Property. Implement mitigation activities that will assist in protecting lives and property by making homes, businesses, infrastructure, and critical facilities more resistant to natural hazards. Support the continuation of the Skagit Community Emergency Response Team (C.E.R.T.) Program to provide citizens from all areas of Skagit County with the information and tools they need to help themselves, their families, and their neighbors in the hours and days immediately following an emergency or disaster event.
- Policy LU-20.1.3 Encourage homeowners and businesses to purchase insurance coverage for damages caused by natural hazards.
- Policy LU-20.1.2 Encourage homeowners and businesses to take preventative actions in areas that are especially vulnerable to natural hazards.
- Policy LU-20.1.3 Develop and implement additional education and outreach programs to increase public awareness of the risks associated with natural hazards. Continue the current flood awareness programs conducted by various jurisdictions as part of the National Flood Insurance Program Community Rating System.

GOAL LU-21 PRESERVE, PROTECT, AND WHERE POSSIBLE, RESTORE NATURAL HABITAT FOR THE CONSERVATION OF SALMONID SPECIES LISTED UNDER THE FEDERAL ESA, THROUGH THE USE OF MANAGEMENT ZONES, DEVELOPMENT REGULATIONS, INCENTIVES FOR VOLUNTARY EFFORT OF PRIVATE LANDOWNERS AND DEVELOPERS, LAND USE CLASSIFICATIONS OR DESIGNATIONS, HABITAT ACQUISITION PROGRAMS OR HABITAT RESTORATION PROJECTS.

OBJECTIVE LU-21.1: Preserve fish and wildlife habitat, where appropriate.

Policy LU-14.1.1 Consider a system for stream typing that is compatible with other jurisdictions' typing system.

GOAL LU-22 PRESERVE AND PROTECT, WHERE POSSIBLE, IDENTIFIED WETLANDS WITHIN THE CITY.

OBJECTIVE LU-22.1 Preserve wetlands and implement a wetlands management strategy.

Policy LU-22.1.1 Determine wetland boundaries using the procedures provided in the following manuals: U.S. Army Corps of Engineers. 2010. Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Western Mountains, Valleys, and Coast Region (Version 2.0), ed. J. S. Wakeley, R. W. Lichvar, and C. V. Noble. ERDC/EL TR-10-3. Vicksburg, MS: U.S. Army Engineer Research and Development Center. And all applicable guidance not superseded by more recent guidance in: Environmental Laboratory. 1987. Corps of Engineers Wetlands Delineation Manual, Technical Report Y-87-1, U.S. Army Engineer Waterways Experiment Station, Vicksburg, Miss. Or the scientifically accepted replacement methodology based on better technical criteria and field indicators as directed by the City following consultation with the WA State Department of Ecology and U.S. Corps of Engineers.

Policy LU-22.1.2 Provide a classification system for wetlands that allows for the designation of both regionally and locally unique wetlands.

Policy LU-22.1.3 Promote mitigation projects that create or restore wetland areas or enhance existing wetland areas. Ensure wetland mitigation projects in the City attain the same ecological functions as natural wetlands of equivalent quality. Preserve land used for wetland mitigation in perpetuity. Monitoring and maintenance should be provided until the success of the site is established.

GOAL LU-23 PRESERVE AND PROTECT, WHERE POSSIBLE, IDENTIFIED PRIORITY HABITAT AREAS WITHIN THE CITY.

OBJECTIVE LU-23.1: Develop a classification system, particularly of habitats of local importance, in addition to Federal or State endangered, threatened or sensitive species.

Policy LU-23.1.1 Establish protection measures for priority habitat areas given the variety and complexity of species within these areas.

GOAL LU-24 PROTECT, ENHANCE, AND RESTORE EXISTING FLOOD STORAGE AND CONVEYANCE FUNCTIONS AND ECOLOGICAL VALUES OF FLOODPLAINS.

OBJECTIVE LU-24.1: Implement strategies to prevent property damage from flooding.

Policy LU-24.1.1 Prevent property damage from flooding by implementing the following development regulations:

- Require adequate peak flow controls for new development.
- Perform the necessary analysis and recommend solutions for existing flooding problems.
- Employ management strategies in flood prone areas to ensure that new development is not exposed to significant flood risk.

Policy LU-24.1.2 Continue to implement FEMA flood hazard regulations.

Policy LU-24.1.3 Identify locations for regional surface water facilities in areas of anticipated extensive development and redevelopment, particularly in Downtown. Promote the establishment of regional surface water management facilities to support infill development and preclude the need for individual on-site ponds and facilities, provide development incentives, encourage efficient use of land, and reduce overall facility maintenance costs.

Policy LU-24.1.4 Require adequate peak flow controls for new development.

Policy LU-24.1.5 Perform the necessary analysis and recommend solutions for existing flooding problems.

Policy LU-24.1.6 Employ management strategies in flood prone areas to ensure that new development is not exposed to significant flood risk.

GOAL LU-25 FIND LONG TERM, ENVIRONMENTALLY RESPONSIBLE, AND COST EFFECTIVE METHODS TO REDUCE THE RISK FROM FLOOD DAMAGE.

Policy LU-25.1.1 Work to become engaged and well informed to diligently address and implement measures to systematically reduce the risks from flooding.

Policy LU-25.1.2 Work to systematically eliminate as many threats from flooding as possible which will achieve long term economic posterity for the region as well as the City.

GOAL LU-26 PRESERVE AND PROTECT, WHERE POSSIBLE, IDENTIFIED STEEP AND EROSION SLOPES WITHIN THE CITY.

- Policy LU-26.1.1 Minimize soil disturbance and maximize retention and replacement of native vegetative cover in erosion hazard areas through development regulations.
- Policy LU-26.1.2 Require increased surface water requirements in areas draining over steep and erosive slopes.
- Policy LU-26.1.3 Discourage development on landslide hazard areas, including steep slopes over 40 percent. Restrict development unless the risks and adverse impacts associated with such development can be reduced to a non-significant level.
- Policy LU-26.1.4 In areas with severe seismic hazards, apply Uniform Building Code, and any other necessary special building design and construction measures to minimize the risk of structural damage, fire and injury to occupants and to prevent post-seismic collapse.

ANNEXATION GOALS, OBJECTIVES AND POLICIES

GOAL LU-27 ANNEX PROPERTIES INTO THE CITY WHEN THE CITY COUNCIL FINDS THE ANNEXATION IS JUSTIFIED.

- OBJECTIVE LU-27.1** Encourage development and re-development within the existing City limits before additional lands are annexed into the City.
 - Policy LU-27.1.1.1 The first priority of the City shall be to annex and provide urban services (i.e., sewer, fire, transportation, drainage, parks, open space, schools and landscaping, etc) on a priority basis to those areas immediately adjacent to the City where available services can most easily and economically be extended.
 - Policy LU-27.1.1.2 Work with Skagit County to establish procedures for the development of land within the Urban Growth Areas.
 - Policy LU-27.1.1.3 The City Council shall not initiate an annexation unless the following criteria can be met with a proposal. These criteria have been developed following the adoption of the City's Buildable Lands Analysis and E.D. Hovee's report entitled, "Commercial and Industrial Land Needs Analysis", dated September 2006. These reports show that the City does not have a balance between projected residential and commercial/industrial uses.
The City Council shall not initiate an annexation unless the following criteria can be met with a proposal. These criteria have been developed following the adoption of the City's Buildable Lands Analysis and E.D. Hovee's report entitled, "Commercial and Industrial Land Needs Analysis", dated September 2006. These reports show that the City does not have a balance between projected

residential and commercial/industrial uses.

- A. The annexation area is determined to be necessary and appropriate to meet the population and/or employment targets.
- B. The annexation of residentially zoned areas shall not occur until additional areas zoned for commercial/industrial uses are officially designated such that a balance between residential and commercial/industrial uses can be achieved within the City.
- C. The annexation is a logical extension of the City's boundaries.
- D. The City finds that adequate municipal services exist to serve the area, and that the factors outlined within RCW 36.93.170(2) are complied with.
- E. The City finds that the boundaries of the proposed annexation are drawn in a manner that makes the provision of public services geographically and economically feasible.
- F. The City finds that it has the capacity to provide City services within the existing City limits; and, those services to annexation areas without major upgrades to these services.
- G. The City finds that there are not negative economic impacts to the City with the extension of services.
- H. The City finds that it can afford to provide City services without having to use funds that would otherwise be spent on already incorporated areas of the City.
- I. The City finds that the annexation will not create financial stress on the City's ability to provide required services to the annexation area.

OBJECTIVE LU-27.2 Preservation of natural neighborhoods and communities

OBJECTIVE LU-27.3 Creation and preservation of logical service areas.

Policy LU-27.3.1 Annex areas into the City based on the premise of limiting sprawl, providing for efficient provision of public services and facilities, serving areas where the cost of extending infrastructure consistent with adopted capital improvement plans is the most cost efficient, and avoiding "leap-frog" development and annexations.

OBJECTIVE LU-27.4 Prevent abnormally irregular boundaries.



APPENDIX A

Land Use Densities

APPENDIX A – LAND USE DENSITIES ALLOWED WITHIN THE CITY

Growth Management Hearings Board decisions have clarified what residential densities should occur in urban growth areas. For clarification purposes, urban growth areas are defined as areas within the City limits in addition to the established urban growth areas where the City and County have joint jurisdiction.

Following is a list of Washington State hearing board cases that have defined urban densities as four (4) or more dwelling units per acre:

In *Berschauer v. Tumwater* 94-2-0002 (FDO 7-27-94) urban densities of 1 dwelling unit per acre and 2-4 dwelling units per acre did not comply with the GMA. (“We conclude that the low-density designations for the SRLUPO area do not comply with the Countywide Planning Policies (CPPs) for orderly and cost effective development of urban services, affordable housing or environmental quality.”)

In the City of Sedro-Woolley, *Friends of Skagit County, et al., petitioners, v. Skagit County*, Decision No. 03-02-0013c Compliance Hearing Order it was found that:

- UGAs are those areas of a county in which urban levels of development are expected to occur. Urban levels of densities are typically at least four dwelling units per acre. Rural densities are, as all three growth hearings boards have held, densities no greater than one dwelling unit per five acres.

In *Bremerton v. Kitsap County* October 1995, the Central Puget Sound Hearings Board found that as a general rule, four (4) dwellings units per acre or more constitutes urban densities. A pattern of one (1) and two and one-half (2 ½) acre lots is a sprawl pattern that should only occur in urban areas to avoid excessive development pressures on or near environmentally sensitive areas (however, this circumstance can be expected to be infrequent with the UGA and must not constitute a pattern over large areas). In *Lawrence Michael Investments, Chevron USA and Chevron Land and Development Company v. Town of Woodway*, January 1999, the Central Puget Sound Hearings board found that, “(the) GMA requires every city to designate all lands within its jurisdiction at appropriate urban densities.”

The City finds that, in light of the recent Washington State Supreme Court ruling in *Viking Properties Inc. v. Oscar W. Holm*, that there is a broad range of discretion that may be exercised by the City and rejects the previous Hearing Board cases cited above to the extent they attempt to create policy or a bright line rule requiring four (4) dwelling units per acre or more to comply with the GMA standard for urban densities.

In *Viking Properties Inc. v. Oscar W. Holm*, slip opinion 75240-1 Aug. 18, 2005, the specific issue of the whether the four net dwelling units per acre rule as adopted by the Growth Management Hearing Boards is an appropriate standard in determining urban densities has been addressed. The Supreme Court re-iterated and recognized that the GMA, its goals and their accompanying regulatory provisions create a 'framework' that guides local jurisdictions in the development of comprehensive plans and development regulations. Within this framework, the legislature has affirmed that there is a 'broad range of discretion that may be exercised by counties and cities consistent with the requirements . . . and goals of {the GMA}.' RCW 36.70A.3201. In other words, the GMA does not prescribe a single

APPENDIX A – LAND USE DENSITIES ALLOWED WITHIN THE CITY

approach to growth management. Instead, the legislature specified that 'the ultimate burden and responsibility for planning, harmonizing the planning goals of {the GMA}, and implementing a county's or city's future rests with that community.' RCW 36.70A.3201. Thus, the GMA acts exclusively through local governments and is to be construed with the requisite flexibility to allow local governments to accommodate local needs.

Based upon the foregoing rationale, the Washington State Supreme Court has specifically rejected the four net dwelling unit per acre rule to the extent it requires Cities to plan in a certain manner and to the extent it creates policy and thus is beyond the authority of the growth management boards as a tribunal:

"...Viking's claim that the GMA imposes a 'bright line' minimum of four dwellings per acre is erroneous. In making this claim, Viking relies upon a 1995 decision of the CPSGMHB. See *Bremerton v. Kitsap County*, CPSGMHB No. 95-3-0039, 1995 WL 903165 (Oct. 6, 1995). However, the growth management hearings boards do not have authority to make 'public policy' even within the limited scope of their jurisdictions, let alone to make statewide public policy. The hearings boards are quasi-judicial agencies that serve a limited role under the GMA, with their powers restricted to a review of those matters specifically delegated by statute. See RCW 36.70A.210(6), .280(1); *Sedlacek v. Hillis*, 145 Wn.2d 379, 385-86, 36 P.3d 1014 (2001) (stating that public policy is set forth in constitutional, statutory, and regulatory provisions, as well as prior judicial decisions). Accord *Roberts v. Dudley*, 140 Wn.2d 58, 63, 993 P.2d 901 (2000); *Thompson v. St. Regis Paper Co.*, 102 Wn.2d 219, 232, 685 P.2d 1081 (1984). See also *Skagit Surveyors & Eng'rs, LLC v. Friends of Skagit County*, 135 Wn.2d 542, 565, 958 P.2d 962 (1998) (stating that the GMA is not to be construed to confer upon a hearings board powers not expressly granted in the GMA). Second, Viking's argument fails to account for the fact that the GMA creates a general 'framework' to guide local jurisdictions instead of 'bright line' rules. See RCW 36.70A.3201; Richard L. Settle, *Washington's Growth Management Revolution Goes to Court*, 23 *Seattle U. L. Rev.* 5, 9 ('most GMA requirements are conceptual, not definitive, and often ambiguous'). Indeed, the existence of restrictive covenants that predate the enactment of the GMA and limit density within the urban growth areas are the type of 'local circumstances' accommodated by the GMA's grant of a 'broad range of discretion' for local planning. See RCW 36.70A.3201; *Cent. Puget Sound Hearings Bd.*, 142 Wn.2d at 561."

Based on the Viking case, the City finds that:

- The four net dwelling unit per acre general rule is invalid to the extent it serves to require a City to plan in a certain manner.
- That this general rule is invalid to the extent it creates a higher burden on the City than what is clearly set forth in the GMA or shifts the burden to the City in which it must now 'prove' to the Board its decisions beyond showing its work.
- That this general rule is invalid to the extent the GMA requires every city to designate all lands within its jurisdiction at appropriate urban densities equates to requiring four net dwelling units per acre and that any residential pattern at a lower density will be subject to increased scrutiny by the Board to determine if the number, locations, configurations and rationale for such lot sizes complies with the goals and requirements of the Act, and the jurisdiction's ability to meet its obligations to accept any allocated share of county-wide population.

APPENDIX A – LAND USE DENSITIES ALLOWED WITHIN THE CITY

Table 6.2 identifies all of the City’s residential zoning designations and their associated densities with different development options that the City permits.

The City determines density requirements for developments using net calculations by multiplying the total acreage of a parcel of property excluding existing or planned streets and rights-of-way and the open water area of wetlands or streams by the density allowed per the site zoning.

Given that the GMA requires every city to plan to reduce the inappropriate conversion of undeveloped land into sprawling, low-density development, the minimum net density for all new residential development, except as outlined below, within the City will be at a minimum density of four (4) dwelling units per acre unless documented critical areas, areas of special flood risk designation, resource lands, restriction on access or other physical site constraints are evident on a parcel that would preclude a development that would yield four (4) dwelling units per acre.

The two (2) zoning designations that result in subdivisions that have a net density of less than four (4) dwelling units per acre are the R-1, 3.0 and the Residential-Agricultural (R-A) which result in maximum densities of 3.0 and 1.24 dwelling units per acre, respectively. The R-1, 3.0 has a minimum lot size of 13,500 square feet and the R-A has a minimum lot size of 35,000 square feet.

As of January 1, 2016, within the City limits there are approximately 731 acres of property zoned R-1, 3.0. These areas will be evaluated to ensure that documented critical areas, a special flood risk designation, resource lands, restrictions on access or other physical site constraints are present so that a density less than the four (4) dwelling units per acre can be justified (as supported, in part, by *Berschauer v. Tumwater* 94-2-0002 (CO 12-17-94), where the Board found that 2-4 dwelling unit per acre designation for a residential/sensitive area where the record demonstrated a complete analysis by the city and the designation was limited to areas of “unique open space character and sensitivity to environmental disturbances” complied with the GMA) when a property owner submits any type of subdivision application to the City. If critical areas, resource lands, restrictions on access, a special flood risk designation or other physical site constraints are not present on the site, and except the existing neighborhood areas discussed below, a property owner will have to complete a rezone of the site, a Planned Unit Development (PUD) will need to be completed, or development rights will need to be purchased through the Transfer of Development Rights (TDR) program when an applicant submits any type of subdivision application to the City, so that a minimum density of four (4) dwelling units per acre can be achieved.

Map LU-5 identifies areas within and abutting existing neighborhoods in the City that are currently zoned Single-Family Residential with a minimum lot size of 9,000 square feet. In addition to identifying the R-1,3.0 zoning, Map LU-5 also shows which parcels have existing structures on them. Consistent with the Washington Supreme Court in *Viking Properties Inc. v. Oscar W. Holm*, slip opinion 75240-1 Aug. 18, 2005, the City shall use the GMA framework with the requisite flexibility to allow the City as the local planning jurisdiction to accommodate its local needs. Thus, to protect the character of existing neighborhoods, to promote a variety of residential densities and housing types, and to encourage the preservation of existing housing stock (GMA planning goals codified in RCW 36.70A.020 (4)) those areas identified on **Map LU-5** will not be required to meet a minimum 4 du/acre density, and shall have a net density of no more than 3.23 dwelling units per acre. These areas reflect land which contains or is next to pre-existing residential neighborhoods and residential neighborhood communities. These areas contain, but are not limited to, the following features: pre-existing residential development, pre-existing residential structures, pre-existing residential amenities (churches, synagogues, community centers or

APPENDIX A – LAND USE DENSITIES ALLOWED WITHIN THE CITY

clubs, granges, etc.), and/or existing covenants that run with the land and disallow subdivision greater than 4 du/acre.

There are 830 parcels of land that combined equal approximately 337 acres that are identified on **Map LU-5** that will have a maximum density of 3.23 du/acre when and if they are developed or re-developed. Of the 830 parcels, 766 have existing buildings; however, only 31 of these parcels are capable of further development due to placement of existing structures or the presence of critical areas. In addition, there are 34 parcels without structures that are capable of further development.

Utilizing the methodology described in the Buildable Lands Analysis (contained in **Appendix LU-B**) the 65 parcels that are capable of being subdivided (parcels with and without structures) were analyzed to see what the difference in the number of total dwelling units would be if a density of four (4) dwelling units per acre versus 3.23 dwelling units per acre was applied to these parcels. At a density of four (4) dwelling units per acre the area identified on **Map LU-5** could produce 98 additional lots for dwelling units; and at a density of 3.23 dwelling units per acre this same area could produce 71 additional lots for dwelling units. With restricting the density to 3.23 dwelling units per acre versus four (4); there is a difference of the creation of only 27 lots for future dwelling units. Please see the spreadsheet incorporated with **Map LU-5** that provides a great amount of detail about all of the parcels identified on **Map LU-5** including all of the parcel numbers, zoning, addresses, whether critical areas are present or not, whether existing structures are present or not, the area of each of the parcels in acres and square feet, and how many additional units could potentially be created on each of the parcels utilizing the Buildable Lands methodology at the two different densities described above.

The Buildable Lands Analysis, contained in **Appendix LU-B**, proves that the City is well able to accommodate its projected growth even with keeping the parcels identified on **Map LU-5** at a maximum density of 3.23 du/acre because the Buildable Lands Analysis calculated potential building lots based on the zoning of a lot and did not consider that certain areas may have to meet a minimum density of four (4) dwelling units per acre.

PNUMBER	ZONING	ADDRESS	CRITICAL AREAS PRESENT?	EXISTING STRUCTURES	ACRES	SQUARE FEET	SQUARE FEET LEFT OVER AFTER B.L. METHODOLOGY UTILIZED ¹	BUILDABLE AFTER ANALYSIS USING B.L. METHODOLOGY ¹	ADDITIONAL UNITS ON LOTS W/EXISTING STRUCTURES	# OF UNITS ON VACANT LOTS	# OF ADDITIONAL UNITS @ 4 DU/ACRE
P52529	R-1,13.5	1921 Windsor Drive	YES	YES	0.566	24649.800	0	NO			
P52530	R-1,13.5	1911 Windsor Drive	YES	YES	0.402	17501.645	0	NO			
P52531	R-1,13.5	1901 Windsor Drive	YES	YES	0.494	21512.272	0	NO			
P52532	R-1,13.5	1821 Windsor Drive	YES	YES	0.514	22373.446	0	NO			
P52533	R-1,13.5	1811 Windsor Drive	YES	YES	0.482	21000.528	0	NO			
P27540	R-1,13.5	4010 E Division Street	NO	YES	0.310	13482.310	0	NO			
P27541	R-1,13.5	4030 E Division Street	NO	YES	0.309	13480.199	0	NO			
P83240	R-1,13.5	4034 E Division Street	NO	YES	0.308	13408.703	0	NO			
P107396	R-1,13.5	3827 Moody Court	NO	YES	0.299	13026.582	0	NO			
P83255	R-1,13.5	130 S Waugh Road	NO	YES	0.307	13375.276	0	NO			
P107392	R-1,13.5	3810 Moody Court	NO	YES	0.310	13500.446	0	NO			
P107393	R-1,13.5	3814 Moody Court	NO	YES	0.310	13500.446	0	NO			
P83254	R-1,13.5	210 S Waugh Road	NO	YES	0.308	13426.496	0	NO			
P105908	R-1,13.5	217 S 38Th Place	NO	YES	0.307	13371.243	0	NO			
P105906	R-1,13.5	3807 Carpenter Street	NO	YES	0.310	13489.944	0	NO			
P105905	R-1,13.5	3813 Carpenter Street	NO	YES	0.307	13354.166	0	NO			
P105904	R-1,13.5	3817 Carpenter Street	NO	YES	0.304	13240.960	0	NO			
P105899	R-1,13.5	3818 Carpenter Street	NO	YES	0.310	13485.020	0	NO			
P105894	R-1,13.5	3809 Ridge Court	NO	YES	0.310	13500.070	0	NO			
P105892	R-1,13.5	3819 Ridge Court	NO	YES	0.306	13332.730	0	NO			
P83933	R-1,13.5	3925 Montgomery Court	NO	YES	0.310	13496.127	0	NO			
P83934	R-1,13.5	3923 Montgomery Court	NO	YES	0.310	13496.127	0	NO			
P105886	R-1,13.5	3810 Ridge Court	NO	YES	0.310	13500.000	0	NO			
P83945	R-1,13.5	405 S Waugh Road	NO	YES	0.303	13181.856	0	NO			
P104218	R-1,13.5	503 S 39Th Place	NO	YES	0.300	13055.919	0	NO			
P104209	R-1,13.5	506 S 39Th Place	NO	YES	0.309	13478.021	0	NO			
P104257	R-1,13.5	3519 Broadway Street	NO	YES	0.308	13411.566	0	NO			
P104242	R-1,13.5	3612 Broadway Street	YES	YES	0.310	13510.085	0	NO			
P104241	R-1,13.5	3604 Broadway Street	YES	YES	0.310	13510.085	0	NO			
P104189	R-1,13.5	1026 S 38th Place	YES	YES	0.311	13559.800	0	NO			
P95749	R-1,13.5	4310 Apache Drive	YES	YES	0.416	18136.178	0	NO			
P95748	R-1,13.5	4316 Apache Drive	YES	YES	0.323	14050.444	0	NO			
P67507	R-1,13.5	4929 Monte Vista Place	YES	YES	0.509	22160.418	0	NO			
P67508	R-1,13.5	4927 Monte Vista Place	YES	YES	0.453	19741.551	0	NO			
P105102	R-1,13.5	4505 Edgemont Place	YES	YES	0.701	30550.564	0	NO			
P105101	R-1,13.5	4517 Edgemont Place	YES	YES	0.487	21214.502	0	NO			
P67510	R-1,13.5	4725 MONTE VISTA PLACE	YES	YES	0.473	20608.848	0	NO			
P67509	R-1,13.5	4801 MONTE VISTA PLACE	YES	YES	0.505	22012.090	0	NO			
P67471	R-1,13.5	4426 Edgemont Place	YES	YES	0.697	30355.660	0	NO			
P67492	R-1,13.5	4812 Monte Vista Place	YES	YES	0.383	16694.054	0	NO			
P67474	R-1,13.5	4500 Edgemont Place	YES	YES	0.408	17791.736	0	NO			
P79422	R-1,13.5	3707 Apache Drive	NO	YES	0.310	13496.201	0	NO			
P79421	R-1,13.5	3715 Apache Drive	NO	YES	0.307	13353.359	0	NO			
P79440	R-1,13.5	1006 Tomahawk Place	NO	YES	0.308	13411.432	0	NO			
P79441	R-1,13.5	3007 N Waugh Road	NO	YES	0.307	13364.274	0	NO			
P79442	R-1,13.5	919 N Waugh Road	NO	YES	0.309	13460.222	0	NO			
P79443	R-1,13.5	911 N Waugh Road	NO	YES	0.310	13482.897	0	NO			
P79444	R-1,13.5	905 N Waugh Road	NO	YES	0.308	13406.134	0	NO			
P27054	R-1,13.5	2416 E Fir Street	NO	YES	0.287	12510.169	0	NO			
P53327	R-1,13.5	2520 E Fir Street	YES	YES	0.369	16094.368	0	NO			
P78140	R-1,13.5	824 Upland Drive	NO	YES	0.302	13176.137	0	NO			
P80918	R-1,13.5	2936 E Fir Street	NO	YES	0.308	13416.089	0	NO			
P54491	R-1,13.5	3400 E Fir Street	YES	YES	0.792	34501.206	0	NO			
P53335	R-1,13.5	811 Elliott Place	NO	YES	0.264	11484.384	0	NO			
P53333	R-1,13.5	808 Elliott Place	NO	YES	0.300	13053.872	0	NO			
P53328	R-1,13.5	817 Addison Place	NO	YES	0.300	13053.519	0	NO			
P53326	R-1,13.5	816 Addison Place	YES	YES	0.300	13057.439	0	NO			

PNUMBER	ZONING	ADDRESS	CRITICAL AREAS PRESENT?	EXISTING STRUCTURES	ACRES	SQUARE FEET	SQUARE FEET LEFT OVER AFTER B.L. METHODOLOGY UTILIZED ¹	BUILDABLE AFTER ANALYSIS USING B.L. METHODOLOGY ¹	ADDITIONAL UNITS ON LOTS W/EXISTING STRUCTURES	# OF UNITS ON VACANT LOTS	# OF ADDITIONAL UNITS @ 4 DU/ACRE
P80919	R-1,13.5	813 N 30Th Street	NO	YES	0.310	13497.321	0	NO			
P53336	R-1,13.5	807 Elliott Place	NO	YES	0.262	11396.359	0	NO			
P80920	R-1,13.5	807 N 30Th Street	NO	YES	0.310	13496.458	0	NO			
P53332	R-1,13.5	804 Elliott Place	NO	YES	0.302	13140.380	0	NO			
P53329	R-1,13.5	809 Addison Place	NO	YES	0.301	13128.345	0	NO			
P80930	R-1,13.5	2803 Cherokee Lane	NO	YES	0.304	13254.797	0	NO			
P80921	R-1,13.5	801 N 30Th Street	NO	YES	0.310	13495.595	0	NO			
P54490	R-1,13.5	3401 Apache Drive	YES	YES	0.535	23287.284	0	NO			
P54489	R-1,13.5	3411 Apache Drive	YES	YES	0.554	24132.086	0	NO			
P53324	R-1,13.5	800 Addison Place	YES	YES	0.400	17435.745	0	NO			
P27135	R-1,13.5	727 Upland Drive	YES	YES	0.398	17346.398	0	NO			
P78174	R-1,13.5	725 Upland Drive	YES	YES	0.335	14612.378	0	NO			
P53323	R-1,13.5	2520 Alison Avenue	YES	YES	0.426	18574.854	0	NO			
P53321	R-1,13.5	2500 Alison Avenue	YES	YES	0.330	14392.654	0	NO			
P53322	R-1,13.5	2510 Alison Avenue	YES	YES	0.330	14384.629	0	NO			
P83269	R-1,13.5	725 N Waugh Road	NO	YES	0.179	7785.445	0	NO			
P78077	R-1,13.5	3325 Mohawk Drive	YES	YES	0.364	15862.448	0	NO			
P117984	R-1,13.5	2400 Stonebridge Way	NO	YES	0.118	5140.965	0	NO			
P117985	R-1,13.5		NO	YES	0.118	5150.155	0	NO			
P117986	R-1,13.5	2412 Stonebridge Way	NO	YES	0.118	5150.155	0	NO			
P117987	R-1,13.5	2416 Stonebridge Way	NO	YES	0.118	5150.155	0	NO			
P117988	R-1,13.5		NO	YES	0.121	5290.463	0	NO			
P119621	R-1,13.5		NO	YES	0.130	5658.425	0	NO			
P119606	R-1,13.5		YES	YES	0.166	7217.050	0	NO			
P117993	R-1,13.5		YES	YES	0.129	5609.772	0	NO			
P117989	R-1,13.5	2401 Stonebridge Way	NO	YES	0.123	5350.859	0	NO			
P117990	R-1,13.5		NO	YES	0.122	5300.143	0	NO			
P117991	R-1,13.5		NO	YES	0.122	5300.143	0	NO			
P117992	R-1,13.5	2520 Stonebridge Way	YES	YES	0.122	5300.143	0	NO			
P119620	R-1,13.5		NO	YES	0.120	5239.179	0	NO			
P83150	R-1,13.5	621 N Waugh Road	NO	YES	0.310	13500.390	0	NO			
P27108	R-1,13.5	610 Shoshone Drive	YES	YES	0.400	17416.357	0	NO			
P119619	R-1,13.5		NO	YES	0.116	5058.843	0	NO			
P78157	R-1,13.5	2715 Iroquois Drive	NO	YES	0.309	13463.129	0	NO			
P78158	R-1,13.5	2723 Iroquois Drive	NO	YES	0.309	13463.048	0	NO			
P119607	R-1,13.5	2500 Stonebridge Way	YES	YES	0.116	5042.799	0	NO			
P78159	R-1,13.5	2731 Iroquois Drive	NO	YES	0.309	13460.885	0	NO			
P119618	R-1,13.5	2512 Stonebridge Way	NO	YES	0.116	5050.253	0	NO			
P119608	R-1,13.5		YES	YES	0.136	5927.802	0	NO			
P119617	R-1,13.5		NO	YES	0.116	5050.253	0	NO			
P83154	R-1,13.5	601 N Waugh Road	NO	YES	0.309	13480.775	0	NO			
P117994	R-1,13.5	506 SHADY LANE	YES	YES	0.133	5772.513	0	NO			
P119609	R-1,13.5		YES	YES	0.149	6472.153	0	NO			
P118206	R-1,13.5	508 Shady Lane	NO	YES	0.147	6420.959	0	NO			
P119610	R-1,13.5	2519 Stonebridge Way	YES	YES	0.125	5466.340	0	NO			
P117995	R-1,13.5		YES	YES	0.118	5148.784	0	NO			
P119615	R-1,13.5	2518 Stonebridge Way	NO	YES	0.118	5128.968	0	NO			
P117996	R-1,13.5		YES	YES	0.116	5054.449	0	NO			
P119611	R-1,13.5		YES	YES	0.147	6423.523	0	NO			
P119614	R-1,13.5		NO	YES	0.134	5830.628	0	NO			
P78109	R-1,13.5	520 Shoshone Drive	YES	YES	0.363	15806.020	0	NO			
P119613	R-1,13.5		NO	YES	0.156	6805.930	0	NO			
P119612	R-1,13.5		NO	YES	0.145	6328.117	0	NO			
P78397	R-1,13.5	521 Sioux Drive	YES	YES	0.349	15183.719	0	NO			
P117997	R-1,13.5	500 Shady Lane	YES	YES	0.130	5674.291	0	NO			
P83644	R-1,13.5	715 LILAC DR	NO	YES	0.310	13498.115	0	NO			
P83625	R-1,13.5	406 Columbine Court	YES	YES	0.312	13570.619	0	NO			

PNUMBER	ZONING	ADDRESS	CRITICAL AREAS PRESENT?	EXISTING STRUCTURES	ACRES	SQUARE FEET	SQUARE FEET LEFT OVER AFTER B.L. METHODOLOGY UTILIZED ¹	BUILDABLE AFTER ANALYSIS USING B.L. METHODOLOGY ¹	ADDITIONAL UNITS ON LOTS W/EXISTING STRUCTURES	# OF UNITS ON VACANT LOTS	# OF ADDITIONAL UNITS @ 4 DU/ACRE
P78402	R-1,13.5	510 Sioux Drive	YES	YES	0.393	17136.658	0	NO			
P78403	R-1,13.5	500 Sioux Drive	YES	YES	0.387	16874.930	0	NO			
P81296	R-1,13.5	3801 Ridge Way	NO	YES	0.310	13493.917	0	NO			
P78404	R-1,13.5	430 Sioux Drive	YES	YES	0.387	16872.006	0	NO			
P83127	R-1,13.5	402 N Waugh Road	NO	YES	0.303	13198.053	0	NO			
P78405	R-1,13.5	420 Sioux Drive	YES	YES	0.422	18362.196	0	NO			
P81289	R-1,13.5	3915 Ridge Way	NO	YES	0.310	13496.575	0	NO			
P83126	R-1,13.5	330 N Waugh Road	NO	YES	0.303	13194.768	0	NO			
P81288	R-1,13.5	3921 Ridge Way	NO	YES	0.310	13494.611	0	NO			
P83125	R-1,13.5	320 N Waugh Road	NO	YES	0.303	13191.483	0	NO			
P81287	R-1,13.5	4001 Ridge Way	NO	YES	0.310	13492.648	0	NO			
P78103	R-1,13.5	320 Sioux Drive	YES	YES	0.415	18090.682	0	NO			
P27092	R-1,13.5	3612 Shoshone Drive	NO	YES	0.309	13463.946	0	NO			
P27093	R-1,13.5	3624 Shoshone Drive	NO	YES	0.310	13491.670	0	NO			
P83124	R-1,13.5	310 N Waugh Road	NO	YES	0.303	13200.696	0	NO			
P78102	R-1,13.5	310 Sioux Drive	YES	YES	0.389	16942.210	0	NO			
P81283	R-1,13.5	222 N Waugh Road	NO	YES	0.306	13332.732	0	NO			
P81282	R-1,13.5	214 N Waugh Road	NO	YES	0.303	13211.737	0	NO			
P81281	R-1,13.5	208 N Waugh Road	NO	YES	0.303	13208.437	0	NO			
P100772	R-1,13.5	120 Cedarwood Place	NO	YES	0.308	13416.734	0	NO			
P81280	R-1,13.5	202 N Waugh Road	NO	YES	0.303	13205.137	0	NO			
P100775	R-1,13.5	4303 Cedarwood Court	NO	YES	0.309	13472.156	0	NO			
P81279	R-1,13.5	122 N Waugh Road	NO	YES	0.303	13201.837	0	NO			
P81277	R-1,13.5	114 N Waugh Road	NO	YES	0.303	13198.537	0	NO			
	R-1,13.5		NO	NO	0.040	1750.694	0	NO			
	R-1,13.5		NO	NO	0.297	12928.015	0	NO			
	R-1,13.5		NO	NO	0.017	719.947	0	NO			
P83250	R-1,13.5		NO	NO	0.156	6795.898	0	NO			
P78141	R-1,13.5	818 Upland Drive	NO	YES	0.310	13501.095	1	NO			
P83151	R-1,13.5	617 N Waugh Road	NO	YES	0.310	13500.641	1	NO			
P83152	R-1,13.5	611 N Waugh Road	NO	YES	0.310	13500.891	1	NO			
P83153	R-1,13.5	607 N Waugh Road	NO	YES	0.310	13501.142	1	NO			
P78142	R-1,13.5	810 Upland Drive	NO	YES	0.310	13501.663	2	NO			
P78143	R-1,13.5	800 Upland Drive	NO	YES	0.310	13502.221	2	NO			
P104181	R-1,13.5	3724 Broadway Street	NO	YES	0.310	13502.595	3	NO			
P81326	R-1,13.5	109 N 39Th Place	NO	YES	0.310	13503.941	4	NO			
P80925	R-1,13.5	808 Mohican Place	NO	YES	0.310	13505.540	6	NO			
P81328	R-1,13.5	102 N 38Th Place	NO	YES	0.310	13505.630	6	NO			
P104239	R-1,13.5	3518 Broadway Street	NO	YES	0.310	13508.242	8	NO			
P104258	R-1,13.5	3509 Broadway Street	NO	YES	0.310	13509.441	9	NO			
P104251	R-1,13.5	3611 Broadway Street	NO	YES	0.310	13509.270	9	NO			
P104250	R-1,13.5	3617 Broadway Street	NO	YES	0.310	13510.389	10	NO			
P104249	R-1,13.5	3625 Broadway Street	NO	YES	0.310	13510.306	10	NO			
P104247	R-1,13.5	3705 Broadway Street	NO	YES	0.310	13510.398	10	NO			
P104198	R-1,13.5	918 S 38Th Place	NO	YES	0.310	13509.576	10	NO			
P104246	R-1,13.5	3710 Broadway Street	NO	YES	0.310	13510.085	10	NO			
P104245	R-1,13.5	3628 Broadway Street	NO	YES	0.310	13510.085	10	NO			
P104244	R-1,13.5	3620 E Broadway Street	NO	YES	0.310	13510.085	10	NO			
P104240	R-1,13.5	3528 Broadway Street	NO	YES	0.310	13510.025	10	NO			
P104237	R-1,13.5	3420 E Broadway Street	NO	YES	0.310	13509.957	10	NO			
P83620	R-1,13.5	624 Lilac Drive	NO	YES	0.310	13510.248	10	NO			
P81327	R-1,13.5	105 N 39Th Place	NO	YES	0.310	13510.151	10	NO			
P104238	R-1,13.5	3508 Broadway Street	NO	YES	0.310	13510.676	11	NO			
P104206	R-1,13.5	514 S 39Th Place	NO	YES	0.310	13512.605	13	NO			
P80917	R-1,13.5	2932 E Fir Street	NO	YES	0.310	13514.144	14	NO			
P83950	R-1,13.5	507 S Waugh Road	NO	YES	0.310	13515.029	15	NO			
P80926	R-1,13.5	807 Mohican Place	NO	YES	0.310	13514.839	15	NO			

PNUMBER	ZONING	ADDRESS	CRITICAL AREAS PRESENT?	EXISTING STRUCTURES	ACRES	SQUARE FEET	SQUARE FEET LEFT OVER AFTER B.L. METHODOLOGY UTILIZED ¹	BUILDABLE AFTER ANALYSIS USING B.L. METHODOLOGY ¹	ADDITIONAL UNITS ON LOTS W/EXISTING STRUCTURES	# OF UNITS ON VACANT LOTS	# OF ADDITIONAL UNITS @ 4 DU/ACRE
P78145	R-1,13.5	714 Upland Drive	NO	YES	0.310	13518.894	19	NO			
P104205	R-1,13.5	3904 E Broadway Street	NO	YES	0.310	13519.802	20	NO			
P83631	R-1,13.5	806 Lilac Drive	NO	YES	0.310	13521.097	21	NO			
P83249	R-1,13.5	4010 Moody Place	NO	YES	0.310	13522.124	22	NO			
P104255	R-1,13.5	3603 Broadway Street	NO	YES	0.310	13522.099	22	NO			
P83632	R-1,13.5	814 Lilac Drive	NO	YES	0.310	13523.510	24	NO			
P80931	R-1,13.5	2802 Cherokee Lane	NO	YES	0.311	13525.619	26	NO			
P83633	R-1,13.5	822 Lilac Drive	NO	YES	0.311	13528.177	28	NO			
P107400	R-1,13.5	3924 E Division Street	NO	YES	0.311	13529.494	29	NO			
P100782	R-1,13.5	4308 Cedarwood Court	NO	YES	0.311	13529.594	30	NO			
P79436	R-1,13.5	917 Tomahawk Place	NO	YES	0.311	13532.728	33	NO			
P83630	R-1,13.5	330 Rose Court	NO	YES	0.311	13533.236	33	NO			
P80916	R-1,13.5	2888 E Fir Street	NO	YES	0.311	13536.366	36	NO			
P78162	R-1,13.5	2716 Iroquois Drive	NO	YES	0.311	13535.576	36	NO			
P107389	R-1,13.5	201 S 38Th Place	NO	YES	0.311	13540.357	40	NO			
P80922	R-1,13.5	2907 Cherokee Lane	NO	YES	0.311	13540.465	40	NO			
P105893	R-1,13.5	3815 Ridge Court	NO	YES	0.311	13542.263	42	NO			
P81285	R-1,13.5	4017 Ridge Way	NO	YES	0.311	13544.081	44	NO			
P81318	R-1,13.5	104 N 39Th Place	NO	YES	0.311	13546.386	46	NO			
P100783	R-1,13.5	4302 Cedarwood Court	NO	YES	0.311	13546.855	47	NO			
P81290	R-1,13.5	322 Rose Court	NO	YES	0.311	13548.397	48	NO			
P80923	R-1,13.5	804 Mohican Place	NO	YES	0.311	13549.044	49	NO			
P107390	R-1,13.5	209 S 38Th Place	NO	YES	0.311	13549.596	50	NO			
P95758	R-1,13.5	3912 Montgomery Court	NO	YES	0.311	13550.227	50	NO			
P27129	R-1,13.5	719 N 30Th Street	NO	YES	0.311	13550.982	51	NO			
P80915	R-1,13.5	2904 E Fir Street	NO	YES	0.311	13551.929	52	NO			
P81336	R-1,13.5	103 N 38Th Place	NO	YES	0.311	13552.596	53	NO			
P104259	R-1,13.5	3501 Broadway Street	NO	YES	0.311	13553.572	54	NO			
P81322	R-1,13.5	124 N 39Th Place	NO	YES	0.311	13554.895	55	NO			
P78156	R-1,13.5	610 Upland Drive	NO	YES	0.311	13559.149	59	NO			
P78152	R-1,13.5	2730 Comanche Drive	NO	YES	0.311	13559.655	60	NO			
P78154	R-1,13.5	2710 Comanche Drive	NO	YES	0.311	13561.834	62	NO			
P78153	R-1,13.5	2720 Comanche Drive	NO	YES	0.311	13561.833	62	NO			
P80927	R-1,13.5	805 Mohican Place	NO	YES	0.311	13565.725	66	NO			
P104215	R-1,13.5	418 S 39Th Place	NO	YES	0.311	13566.775	67	NO			
P105909	R-1,13.5	225 S 38Th Place	NO	YES	0.312	13578.150	78	NO			
P83948	R-1,13.5	429 S Waugh Road	NO	YES	0.312	13578.901	79	NO			
P81302	R-1,13.5	3904 Ridge Way	NO	YES	0.312	13583.409	83	NO			
P81303	R-1,13.5	3914 Ridge Way	NO	YES	0.312	13583.409	83	NO			
P81304	R-1,13.5	3920 Ridge Way	NO	YES	0.312	13583.409	83	NO			
P81305	R-1,13.5	4002 Ridge Way	NO	YES	0.312	13583.409	83	NO			
P78148	R-1,13.5	2701 Comanche Drive	NO	YES	0.312	13586.684	87	NO			
P104211	R-1,13.5	426 S 39Th Place	NO	YES	0.312	13590.405	90	NO			
P104219	R-1,13.5	515 S 39Th Place	NO	YES	0.312	13590.585	91	NO			
P105910	R-1,13.5	305 S 38Th Place	NO	YES	0.312	13594.209	94	NO			
P83253	R-1,13.5	220 S Waugh Road	NO	YES	0.312	13596.521	97	NO			
P104236	R-1,13.5	3410 Broadway Street	NO	YES	0.312	13600.915	101	NO			
P105911	R-1,13.5	313 S 38Th Place	NO	YES	0.312	13602.184	102	NO			
P95755	R-1,13.5	4015 Broadway Street	NO	YES	0.312	13603.725	104	NO			
P104202	R-1,13.5	3816 Broadway Street	NO	YES	0.312	13609.308	109	NO			
P104204	R-1,13.5	3826 Broadway Street	NO	YES	0.313	13612.700	113	NO			
P104190	R-1,13.5	1022 S 38Th Place	NO	YES	0.313	13612.547	113	NO			
P83134	R-1,13.5	604 N Waugh Road	NO	YES	0.313	13615.760	116	NO			
P83928	R-1,13.5	4007 Montgomery Place	NO	YES	0.313	13620.225	120	NO			
P83932	R-1,13.5	3927 Montgomery Court	NO	YES	0.313	13620.450	120	NO			
P83943	R-1,13.5	301 S Waugh Road	NO	YES	0.313	13619.800	120	NO			
P83242	R-1,13.5	115 S Waugh Road	NO	YES	0.313	13620.944	121	NO			

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P79433	R-1,13.5	918 Apache Drive	NO	YES	0.313	13624.350	124	NO			
P81286	R-1,13.5	4007 Ridge Way	NO	YES	0.313	13625.247	125	NO			
P100766	R-1,13.5	117 Cedarwood Place	NO	YES	0.313	13624.834	125	NO			
P83245	R-1,13.5	4015 Moody Place	NO	YES	0.313	13625.628	126	NO			
P27125	R-1,13.5	2902 Cherokee Lane	NO	YES	0.313	13638.582	139	NO			
P27131	R-1,13.5	2910 Cherokee Lane	NO	YES	0.313	13638.575	139	NO			
P78146	R-1,13.5	708 Upland Drive	NO	YES	0.313	13639.076	139	NO			
P105897	R-1,13.5	3808 Carpenter Street	NO	YES	0.313	13642.364	142	NO			
P95646	R-1,13.5	622 Honeysuckle Drive	NO	YES	0.313	13644.231	144	NO			
P119604	R-1,13.5		YES	NO	0.122	5299.404	145	NO			
P81329	R-1,13.5	108 N 38Th Place	NO	YES	0.313	13648.809	149	NO			
P83941	R-1,13.5	3924 Montgomery Court	NO	YES	0.313	13650.431	150	NO			
P83940	R-1,13.5	3922 Montgomery Court	NO	YES	0.313	13650.417	150	NO			
P104256	R-1,13.5	3527 Broadway Street	NO	YES	0.313	13649.955	150	NO			
P67493	R-1,13.5	4826 MONTE VISTA PLACE	YES	YES	0.406	17699.099	150	NO			
P81311	R-1,13.5	125 N Waugh Road	NO	YES	0.313	13649.883	150	NO			
P105914	R-1,13.5	403 S 38Th Place	NO	YES	0.313	13651.961	152	NO			
P105912	R-1,13.5	321 S 38Th Place	NO	YES	0.313	13653.495	153	NO			
P83938	R-1,13.5	3918 Montgomery Court	NO	YES	0.314	13660.525	161	NO			
P95760	R-1,13.5	4224 Montgomery Place	NO	YES	0.314	13664.063	164	NO			
P105888	R-1,13.5	3820 Ridge Court	NO	YES	0.314	13666.713	167	NO			
P95650	R-1,13.5	315 Lilac Drive	NO	YES	0.314	13668.527	169	NO			
P78151	R-1,13.5	2731 Comanche Drive	NO	YES	0.314	13669.430	169	NO			
P83936	R-1,13.5	3919 Montgomery Court	NO	YES	0.314	13670.307	170	NO			
P105890	R-1,13.5	3828 Ridge Court	NO	YES	0.314	13671.191	171	NO			
P107270	R-1,13.5		YES	NO	0.348	15141.787	175	NO			
P95621	R-1,13.5	4019 Wildflower Court	NO	YES	0.314	13676.380	176	NO			
P105898	R-1,13.5	3814 Carpenter Street	NO	YES	0.314	13678.624	179	NO			
P79423	R-1,13.5	3615 Apache Drive	NO	YES	0.314	13679.154	179	NO			
P81335	R-1,13.5	109 N 38Th Place	NO	YES	0.314	13679.125	179	NO			
P78150	R-1,13.5	2721 Comanche Drive	NO	YES	0.314	13685.377	185	NO			
P81319	R-1,13.5	108 N 39Th Place	NO	YES	0.314	13686.044	186	NO			
P83643	R-1,13.5	419 Rose Court	NO	YES	0.314	13690.448	190	NO			
P95757	R-1,13.5	3914 Montgomery Court	NO	YES	0.314	13691.252	191	NO			
P81310	R-1,13.5	4024 Ridge Way	NO	YES	0.314	13693.203	193	NO			
P104186	R-1,13.5	1019 S 38Th Place	NO	YES	0.314	13693.990	194	NO			
P78149	R-1,13.5	2711 Comanche Drive	NO	YES	0.314	13699.194	199	NO			
P105917	R-1,13.5	425 38Th Place	NO	YES	0.315	13700.204	200	NO			
P79424	R-1,13.5	3607 Apache Drive	NO	YES	0.315	13713.597	214	NO			
P105901	R-1,13.5	3825 Carpenter Street	NO	YES	0.315	13723.920	224	NO			
P83939	R-1,13.5	3920 Montgomery Court	NO	YES	0.315	13729.787	230	NO			
P83946	R-1,13.5	413 S Waugh Road	NO	YES	0.315	13730.394	230	NO			
P79425	R-1,13.5	1011 Apache Drive	NO	YES	0.315	13732.486	232	NO			
P83651	R-1,13.5	519 Columbine Court	NO	YES	0.315	13734.103	234	NO			
P83947	R-1,13.5	421 S Waugh Road	NO	YES	0.315	13735.495	235	NO			
P83244	R-1,13.5	4025 Moody Place	NO	YES	0.315	13737.082	237	NO			
P83967	R-1,13.5	4219 Montgomery Place	NO	YES	0.315	13738.680	239	NO			
P81315	R-1,13.5	4008 Creek Place	NO	YES	0.316	13743.453	243	NO			
P81306	R-1,13.5	4006 Ridge Way	NO	YES	0.316	13746.475	246	NO			
P79448	R-1,13.5	3605 E Fir Street	NO	YES	0.316	13748.001	248	NO			
P79447	R-1,13.5	3611 Fir Street	NO	YES	0.316	13748.366	248	NO			
P79446	R-1,13.5	3703 E Fir Street	NO	YES	0.316	13748.731	249	NO			
P79445	R-1,13.5	3709 E Fir Street	NO	YES	0.316	13748.915	249	NO			
P27127	R-1,13.5	2810 Cherokee Lane	NO	YES	0.316	13750.744	251	NO			
P83942	R-1,13.5	4004 Montgomery Place	NO	YES	0.316	13753.835	254	NO			
P105891	R-1,13.5	3825 Ridge Court	NO	YES	0.316	13760.980	261	NO			
P95651	R-1,13.5	1402 ROOSEVELT	NO	YES	0.316	13767.919	268	NO			

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P79439	R-1,13.5	918 Tomahawk Place	NO	YES	0.316	13771.788	272	NO			
P81300	R-1,13.5	3818 Ridge Way	NO	YES	0.316	13776.111	276	NO			
P95746	R-1,13.5	4311 Apache Drive	NO	YES	0.316	13781.859	282	NO			
P100760	R-1,13.5	105 Cedarwood Place	NO	YES	0.316	13782.084	282	NO			
P27126	R-1,13.5	2820 Cherokee Lane	NO	YES	0.316	13784.301	284	NO			
P81316	R-1,13.5	4014 Creek Place	NO	YES	0.316	13783.706	284	NO			
P100761	R-1,13.5	107 Cedarwood Place	NO	YES	0.316	13785.138	285	NO			
P100759	R-1,13.5	103 Cedarwood Place	NO	YES	0.316	13784.849	285	NO			
P83243	R-1,13.5	125 S Waugh Road	NO	YES	0.317	13790.354	290	NO			
P95756	R-1,13.5	3911 Montgomery Court	NO	YES	0.317	13789.552	290	NO			
P83160	R-1,13.5	415 N Waugh Road	NO	YES	0.317	13793.710	294	NO			
P100776	R-1,13.5	4311 Cedarwood Court	NO	YES	0.317	13793.925	294	NO			
P107388	R-1,13.5	117 S 38Th Place	NO	YES	0.317	13794.702	295	NO			
P83927	R-1,13.5	4009 Montgomery Court	NO	YES	0.317	13800.275	300	NO			
P104225	R-1,13.5	3721 E Broadway Street	NO	YES	0.317	13807.918	308	NO			
P83960	R-1,13.5	4204 Montgomery Place	NO	YES	0.317	13811.141	311	NO			
P105900	R-1,13.5	3822 E Carpenter Street	NO	YES	0.317	13817.731	318	NO			
P83961	R-1,13.5	4210 Montgomery Place	NO	YES	0.317	13819.273	319	NO			
P79426	R-1,13.5	1005 Apache Drive	NO	YES	0.317	13818.785	319	NO			
P83616	R-1,13.5	610 Lilac Drive	NO	YES	0.317	13821.096	321	NO			
P81334	R-1,13.5	115 N 38Th Place	NO	YES	0.317	13825.424	325	NO			
P83653	R-1,13.5	611 Lilac Drive	NO	YES	0.317	13830.278	330	NO			
P95668	R-1,13.5	520 Lilac Drive	NO	YES	0.318	13832.181	332	NO			
P95644	R-1,13.5	610 Honeysuckle Drive	NO	YES	0.318	13846.992	347	NO			
P100765	R-1,13.5	115 Cedarwood Place	NO	YES	0.318	13848.436	348	NO			
P100762	R-1,13.5	109 Cedarwood Place	NO	YES	0.318	13852.155	352	NO			
P27130	R-1,13.5	725 N 30Th Street	NO	YES	0.318	13861.568	362	NO			
P95649	R-1,13.5	702 Honeysuckle Drive	NO	YES	0.318	13866.618	367	NO			
P78144	R-1,13.5	724 Upland Drive	NO	YES	0.318	13870.262	370	NO			
P79435	R-1,13.5	3612 Apache Drive	NO	YES	0.319	13899.178	399	NO			
P83621	R-1,13.5	411 Columbine Court	NO	YES	0.319	13906.142	406	NO			
P81317	R-1,13.5	4020 Creek Place	NO	YES	0.319	13906.152	406	NO			
P83645	R-1,13.5	707 Lilac Drive	NO	YES	0.319	13911.511	412	NO			
P81309	R-1,13.5	4020 Ridge Way	NO	YES	0.319	13911.996	412	NO			
P83959	R-1,13.5	302 S Waugh Road	NO	YES	0.320	13931.487	431	NO			
P25523	R-1,13.5	1103 N Waugh Road	NO	YES	0.320	13931.776	432	NO			
P83951	R-1,13.5	529 S Waugh Road	NO	YES	0.320	13933.768	434	NO			
P83139	R-1,13.5	630 N Waugh Road	NO	YES	0.320	13950.000	450	NO			
P83138	R-1,13.5	624 N Waugh Road	NO	YES	0.320	13950.000	450	NO			
P83137	R-1,13.5	620 N Waugh Road	NO	YES	0.320	13950.000	450	NO			
P83136	R-1,13.5	614 N Waugh Road	NO	YES	0.320	13950.000	450	NO			
P80928	R-1,13.5	801 Mohican Place	NO	YES	0.320	13957.178	457	NO			
P83642	R-1,13.5	427 Rose Court	NO	YES	0.321	13963.994	464	NO			
P83135	R-1,13.5	610 N Waugh Road	NO	YES	0.321	13968.302	468	NO			
P105887	R-1,13.5	3816 Ridge Court	NO	YES	0.321	13977.027	477	NO			
P100773	R-1,13.5	118 Cedarwood Place	NO	YES	0.321	13979.147	479	NO			
P104183	R-1,13.5	909 S 38Th Place	NO	YES	0.321	13982.264	482	NO			
P81301	R-1,13.5	3826 Ridge Way	NO	YES	0.321	13982.471	482	NO			
P107401	R-1,13.5	3817 Moody Court	NO	YES	0.321	13993.195	493	NO			
P83628	R-1,13.5	716 Lilac Drive	NO	YES	0.321	13999.916	500	NO			
P83650	R-1,13.5	520 Columbine Court	NO	YES	0.321	14000.704	501	NO			
P81299	R-1,13.5	3812 Ridge Way	NO	YES	0.322	14005.676	506	NO			
P104184	R-1,13.5	919 S 38Th Place	NO	YES	0.322	14008.722	509	NO			
P83963	R-1,13.5	4220 Montgomery Place	NO	YES	0.322	14013.702	514	NO			
P80929	R-1,13.5	2809 Cherokee Lane	NO	YES	0.322	14017.318	517	NO			
P95642	R-1,13.5	613 Honeysuckle Drive	NO	YES	0.322	14017.788	518	NO			
P95620	R-1,13.5	719 Honeysuckle Drive	NO	YES	0.322	14031.508	532	NO			

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P67485	R-1,13.5	4624 Monte Vista Drive	YES	YES	0.334	14567.715	540	NO			
P83652	R-1,13.5	621 Lilac Drive	NO	YES	0.322	14047.023	547	NO			
P83962	R-1,13.5	4218 Montgomery Place	NO	YES	0.323	14085.839	586	NO			
P79438	R-1,13.5	912 Tomahawk Place	NO	YES	0.323	14088.348	588	NO			
P107391	R-1,13.5	3804 Moody Court	NO	YES	0.324	14097.421	597	NO			
P105881	R-1,13.5	506 S 38Th Place	NO	YES	0.324	14105.185	605	NO			
P104192	R-1,13.5	1014 S 38Th Place	NO	YES	0.324	14105.731	606	NO			
P105895	R-1,13.5	3803 Ridge Court	NO	YES	0.324	14110.501	611	NO			
P83966	R-1,13.5	4221 Montgomery Place	NO	YES	0.324	14112.184	612	NO			
P105885	R-1,13.5	410 S 38Th Place	NO	YES	0.324	14115.151	615	NO			
P83149	R-1,13.5	627 N Waugh Road	NO	YES	0.324	14116.335	616	NO			
P83131	R-1,13.5		NO	NO	0.014	619.249	619	NO			
P107398	R-1,13.5	3805 Moody Court	NO	YES	0.324	14135.094	635	NO			
P83937	R-1,13.5	3917 Montgomery Court	NO	YES	0.325	14155.366	655	NO			
P79437	R-1,13.5	911 Tomahawk Place	NO	YES	0.325	14158.242	658	NO			
P104182	R-1,13.5	903 S 38Th Place	NO	YES	0.325	14174.039	674	NO			
P95747	R-1,13.5	4315 Apache Drive	NO	YES	0.325	14174.370	674	NO			
P78155	R-1,13.5	2700 Comanche Drive	NO	YES	0.325	14175.756	676	NO			
P105907	R-1,13.5	220 S 38Th Place	NO	YES	0.326	14193.451	693	NO			
P67490	R-1,13.5	4806 MONTE VISTA PLACE	YES	YES	0.422	18390.711	706	NO			
P79428	R-1,13.5	909 Apache Drive	NO	YES	0.327	14224.543	725	NO			
P100781	R-1,13.5	4314 Cedarwood Court	NO	YES	0.327	14225.233	725	NO			
P79434	R-1,13.5	1008 Apache Drive	NO	YES	0.327	14229.897	730	NO			
P104224	R-1,13.5	3729 Broadway Street	NO	YES	0.327	14235.258	735	NO			
P100777	R-1,13.5	4317 Cedarwood Court	NO	YES	0.327	14261.451	761	NO			
P105896	R-1,13.5	3802 Carpenter Street	NO	YES	0.328	14266.120	766	NO			
P83972	R-1,13.5	4209 Montgomery Place	NO	YES	0.328	14274.013	774	NO			
P83640	R-1,13.5	432 Rose Court	NO	YES	0.328	14288.502	789	NO			
P53330	R-1,13.5	2503 Alison Avenue	NO	YES	0.328	14307.875	808	NO			
P53331	R-1,13.5	2407 Alison Avenue	NO	YES	0.329	14315.125	815	NO			
P78398	R-1,13.5		YES	NO	0.032	1392.040	864	NO			
P79429	R-1,13.5	905 Apache Drive	NO	YES	0.330	14375.452	875	NO			
P53320	R-1,13.5	2410 Alison Avenue	NO	YES	0.331	14400.426	900	NO			
P83157	R-1,13.5	515 N Waugh Road	NO	YES	0.331	14401.456	901	NO			
P95645	R-1,13.5	616 Honeysuckle Drive	NO	YES	0.331	14407.705	908	NO			
P81291	R-1,13.5	325 Rose Court	NO	YES	0.331	14431.498	931	NO			
P104196	R-1,13.5	924 S 38Th Place	NO	YES	0.332	14449.347	949	NO			
P83141	R-1,13.5	710 N Waugh Road	NO	YES	0.332	14454.125	954	NO			
P83619	R-1,13.5	618 Lilac Lane	NO	YES	0.332	14457.383	957	NO			
P27116	R-1,13.5	814 N 30Th Street	NO	YES	0.332	14477.729	978	NO			
P81330	R-1,13.5	114 N 38Th Place	NO	YES	0.332	14482.136	982	NO			
P79427	R-1,13.5	1001 Apache Drive	NO	YES	0.333	14483.947	984	NO			
P83974	R-1,13.5	4205 Montgomery Place	NO	YES	0.333	14486.357	986	NO			
P104222	R-1,13.5	3803 E Broadway Street	NO	YES	0.333	14495.876	996	NO			
P100780	R-1,13.5	4320 Cedarwood Court	NO	YES	0.333	14501.154	1001	NO			
P27113	R-1,13.5	3010 E Fir Street	NO	YES	0.333	14505.524	1006	NO			
P104217	R-1,13.5	425 S 39Th Place	NO	YES	0.334	14538.954	1039	NO			
P83944	R-1,13.5	329 S Waugh Road	NO	YES	0.334	14545.537	1046	NO			
P117999	R-1,13.5	512 Shady Lane	NO	NO	0.061	2673.416	1048	NO			
P117999	R-1,13.5	512 Shady Lane	YES	NO	0.972	42331.525	1048	NO			
P83635	R-1,13.5	821 Lilac Drive	NO	YES	0.334	14561.339	1061	NO			
P83629	R-1,13.5	333 Rose Court	NO	YES	0.334	14570.680	1071	NO			
P83140	R-1,13.5	634 N Waugh Road	NO	YES	0.335	14590.859	1091	NO			
P104201	R-1,13.5	3806 Broadway Street	NO	YES	0.335	14595.596	1096	NO			
P83158	R-1,13.5	435 N Waugh Road	NO	YES	0.335	14601.675	1102	NO			
P83969	R-1,13.5	4215 Montgomery Place	NO	YES	0.335	14608.641	1109	NO			
P78166	R-1,13.5	601 Iroquois Drive	NO	YES	0.336	14618.278	1118	NO			

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P95762	R-1,13.5	4225 Broadway Street	NO	YES	0.336	14620.738	1121	NO			
P83970	R-1,13.5	4213 Montgomery Place	NO	YES	0.336	14628.194	1128	NO			
P83627	R-1,13.5	708 Lilac Drive	YES	YES	0.347	15134.265	1141	NO			
P83975	R-1,13.5	4203 Montgomery Place	NO	YES	0.336	14642.745	1143	NO			
P67486	R-1,13.5	4612 Monte Vista Drive	NO	YES	0.336	14656.757	1157	NO			
P83636	R-1,13.5	813 Lilac Drive	NO	YES	0.337	14674.375	1174	NO			
P104200	R-1,13.5	910 S 38Th Place	NO	YES	0.337	14677.223	1177	NO			
P100779	R-1,13.5	4326 Cedarwood Court	NO	YES	0.337	14678.968	1179	NO			
P81298	R-1,13.5	3806 Ridge Way	NO	YES	0.338	14702.944	1203	NO			
P83953	R-1,13.5	506 S Waugh Road	NO	YES	0.338	14738.282	1238	NO			
P81276	R-1,13.5	106 N Waugh Road	NO	YES	0.338	14737.795	1238	NO			
P83159	R-1,13.5	425 N Waugh Road	NO	YES	0.338	14743.052	1243	NO			
P83954	R-1,13.5	428 S Waugh Road	NO	YES	0.339	14762.982	1263	NO			
P95754	R-1,13.5	3915 Montgomery Court	NO	YES	0.339	14765.536	1266	NO			
P83156	R-1,13.5	525 N Waugh Road	NO	YES	0.339	14771.511	1272	NO			
P107402	R-1,13.5	3821 Moody Court	NO	YES	0.340	14800.774	1301	NO			
P52528	R-1,13.5	2001 Windsor Drive	YES	YES	0.482	20999.566	1308	NO			
P83968	R-1,13.5	4217 Montgomery Place	NO	YES	0.340	14816.261	1316	NO			
P83956	R-1,13.5	416 S Waugh Road	NO	YES	0.340	14825.537	1326	NO			
P83155	R-1,13.5	535 N Waugh Road	NO	YES	0.341	14842.953	1343	NO			
P83957	R-1,13.5	404 S Waugh Road	NO	YES	0.341	14869.050	1369	NO			
P78108	R-1,13.5	510 Shoshone Drive	NO	YES	0.343	14931.198	1431	NO			
P78107	R-1,13.5	500 Shoshone Drive	NO	YES	0.343	14949.154	1449	NO			
P78106	R-1,13.5	430 Shoshone Drive	NO	YES	0.343	14949.154	1449	NO			
P83637	R-1,13.5	412 Rose Court	NO	YES	0.343	14962.335	1462	NO			
P81284	R-1,13.5	233 N Waugh Road	NO	YES	0.343	14962.622	1463	NO			
P95624	R-1,13.5	4008 Wildflower Court	NO	YES	0.344	14986.599	1487	NO			
P78394	R-1,13.5	431 Sioux Drive	NO	YES	0.344	15006.054	1506	NO			
P83634	R-1,13.5	828 Lilac Drive	NO	YES	0.345	15032.801	1533	NO			
P78395	R-1,13.5	433 Sioux Drive	NO	YES	0.346	15056.193	1556	NO			
P83615	R-1,13.5	606 Lilac Drive	NO	YES	0.346	15072.963	1573	NO			
P104193	R-1,13.5	1010 S 38Th Place	NO	YES	0.347	15096.715	1597	NO			
P78396	R-1,13.5	501 Sioux Drive	NO	YES	0.347	15106.332	1606	NO			
P83958	R-1,13.5	330 S Waugh Road	NO	YES	0.347	15111.712	1612	NO			
P83128	R-1,13.5	4112 Lupine Drive	NO	YES	0.348	15158.546	1659	NO			
P104221	R-1,13.5	3813 E Broadway Street	NO	YES	0.348	15163.086	1663	NO			
P83952	R-1,13.5	4211 Broadway Street	NO	YES	0.349	15189.910	1690	NO			
P83148	R-1,13.5	635 N Waugh Road	NO	YES	0.349	15197.063	1697	NO			
P83624	R-1,13.5	414 Columbine Court	NO	YES	0.350	15237.332	1737	NO			
P81313	R-1,13.5	4005 Creek Place	NO	YES	0.351	15272.434	1772	NO			
P78081	R-1,13.5	3420 Mohawk Drive	NO	YES	0.351	15289.953	1790	NO			
P119605	R-1,13.5		YES	NO	0.115	5023.014	1798	NO			
P78173	R-1,13.5	715 Upland Drive	NO	YES	0.353	15378.964	1879	NO			
P54480	R-1,13.5	3400 Apache Drive	YES	YES	0.641	27912.137	1894	NO			
P100767	R-1,13.5	119 Cedarwood Place	NO	YES	0.354	15410.224	1910	NO			
P78172	R-1,13.5	709 Upland Drive	NO	YES	0.354	15419.707	1920	NO			
P81297	R-1,13.5	3800 Ridge Way	NO	YES	0.354	15421.531	1922	NO			
P83964	R-1,13.5	4222 Montgomery Place	NO	YES	0.354	15429.470	1929	NO			
P100758	R-1,13.5	101 Cedarwood Place	NO	YES	0.354	15432.768	1933	NO			
P107394	R-1,13.5	3820 Moody Court	NO	YES	0.354	15437.746	1938	NO			
P78082	R-1,13.5	3410 Mohawk Drive	NO	YES	0.356	15525.000	2025	NO			
P78167	R-1,13.5	603 Iroquois Drive	NO	YES	0.357	15558.985	2059	NO			
P83973	R-1,13.5	4207 Montgomery Place	NO	YES	0.357	15560.047	2060	NO			
P81307	R-1,13.5	4010 Ridge Way	NO	YES	0.357	15566.652	2067	NO			
P95643	R-1,13.5	604 Honeysuckle Drive	NO	YES	0.357	15572.667	2073	NO			
P104185	R-1,13.5	1009 S 38Th Place	NO	YES	0.358	15574.453	2074	NO			
P81323	R-1,13.5	125 N 39Th Place	YES	YES	0.369	16078.379	2089	NO			

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P100770	R-1,13.5	124 Cedarwood Place	NO	YES	0.359	15656.325	2156	NO			
P100787	R-1,13.5	3700 Shoshone Drive	YES	YES	0.414	18047.777	2161	NO			
P83248	R-1,13.5	4006 Moody Place	NO	YES	0.360	15668.553	2169	NO			
P52525	R-1,13.5	1906 Windsor Drive	NO	YES	0.360	15695.532	2196	NO			
P83133	R-1,13.5	601 Honeysuckle Drive	NO	YES	0.361	15717.395	2217	NO			
P67505	R-1,13.5	4924 Monte Vista Place	NO	YES	0.361	15746.447	2246	NO			
P83129	R-1,13.5	430 N Waugh Road	NO	YES	0.362	15748.998	2249	NO			
P27134	R-1,13.5	2608 E Fir Street	YES	YES	1.185	51598.436	2252	NO			
P53337	R-1,13.5	2331 Alison Avenue	NO	YES	0.362	15766.512	2267	NO			
P95761	R-1,13.5	4226 Montgomery Place	NO	YES	0.362	15770.024	2270	NO			
P83622	R-1,13.5	419 Columbine Court	NO	YES	0.362	15790.388	2290	NO			
P27085	R-1,13.5		NO	NO	0.053	2295.091	2295	NO			
P83929	R-1,13.5	4003 Montgomery Court	NO	YES	0.363	15807.223	2307	NO			
P104194	R-1,13.5	1006 S 38Th Place	NO	YES	0.364	15866.861	2367	NO			
P81320	R-1,13.5	112 N 39Th Place	NO	YES	0.365	15893.008	2393	NO			
P81294	R-1,13.5	3809 Ridge Way	NO	YES	0.365	15909.754	2410	NO			
P27109	R-1,13.5	3320 Mohawk Drive	NO	YES	0.366	15949.081	2449	NO			
P95628	R-1,13.5	625 Honeysuckle Drive	NO	YES	0.366	15963.401	2463	NO			
P27055	R-1,13.5	822 Elliott Place	NO	YES	0.367	15999.173	2499	NO			
P83623	R-1,13.5	422 Columbine Court	NO	YES	0.367	15999.227	2499	NO			
P119361	R-1,13.5		YES	NO	0.249	10849.828	2534	NO			
P27056	R-1,13.5	823 Addison Place	NO	YES	0.368	16035.317	2535	NO			
P78105	R-1,13.5	420 Shoshone Drive	NO	YES	0.369	16067.254	2567	NO			
P79431	R-1,13.5	3515 E Fir Street	NO	YES	0.370	16116.180	2616	NO			
P95667	R-1,13.5	508 Lilac Drive	NO	YES	0.370	16134.005	2634	NO			
P95626	R-1,13.5	629 Honeysuckle Drive	NO	YES	0.370	16135.425	2635	NO			
P107397	R-1,13.5	3813 Moody Court	NO	YES	0.371	16182.363	2682	NO			
P54545	R-1,13.5	2903 Iroquois Drive	NO	YES	0.372	16182.712	2683	NO			
P54544	R-1,13.5	2901 Iroquois Drive	NO	YES	0.372	16182.714	2683	NO			
P54543	R-1,13.5	2911 Iroquois Drive	NO	YES	0.372	16182.716	2683	NO			
P54546	R-1,13.5	2801 Iroquois Drive	NO	YES	0.372	16186.969	2687	NO			
P83638	R-1,13.5	422 Rose Court	NO	YES	0.372	16193.331	2693	NO			
P78087	R-1,13.5	431 Shoshone Drive	NO	YES	0.372	16194.320	2694	NO			
P78160	R-1,13.5	2730 Iroquois Drive	NO	YES	0.373	16236.153	2736	NO			
P54547	R-1,13.5	2800 Iroquois Drive	NO	YES	0.373	16244.350	2744	NO			
P107387	R-1,13.5	109 S 38Th Place	NO	YES	0.374	16271.040	2771	NO			
P54548	R-1,13.5	2810 Iroquois Drive	NO	YES	0.374	16276.798	2777	NO			
P54549	R-1,13.5	2900 Iroquois Drive	NO	YES	0.374	16278.498	2778	NO			
P54550	R-1,13.5	2910 Iroquois Drive	NO	YES	0.374	16280.199	2780	NO			
P83641	R-1,13.5		NO	YES	0.374	16290.008	2790	NO			
P54534	R-1,13.5	2810 Comanche Drive	NO	YES	0.374	16301.942	2802	NO			
P54535	R-1,13.5	2900 Comanche Drive	NO	YES	0.374	16301.940	2802	NO			
P54536	R-1,13.5	2910 Comanche Drive	NO	YES	0.374	16301.939	2802	NO			
P78171	R-1,13.5	701 Upland Drive	NO	YES	0.374	16312.974	2813	NO			
P54533	R-1,13.5	2800 Comanche Drive	NO	YES	0.375	16330.350	2830	NO			
P54529	R-1,13.5	2911 Comanche Drive	NO	YES	0.375	16354.674	2855	NO			
P54530	R-1,13.5	2901 Comanche Drive	NO	YES	0.376	16374.714	2875	NO			
P54531	R-1,13.5	2811 Comanche Drive	NO	YES	0.376	16394.754	2895	NO			
P67506	R-1,13.5	4922 Monte Vista Place	NO	YES	0.377	16430.788	2931	NO			
P54532	R-1,13.5	2801 Comanche Drive	NO	YES	0.378	16481.086	2981	NO			
P100769	R-1,13.5	123 Cedarwood Place	NO	YES	0.379	16512.794	3013	NO			
P27082	R-1,13.5		NO	NO	0.069	3013.743	3014	NO			
P95616	R-1,13.5	513 Lilac Drive	NO	YES	0.381	16574.755	3075	NO			
P27083	R-1,13.5		NO	NO	0.072	3142.987	3143	NO			
P27084	R-1,13.5		NO	NO	0.072	3147.435	3147	NO			
P27096	R-1,13.5	3605 Shoshone Drive	YES	YES	0.431	18790.446	3222	NO			
P79432	R-1,13.5	912 Apache Drive	NO	YES	0.384	16745.473	3245	NO			

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P27091	R-1,13.5	3602 Shoshone Drive	YES	YES	0.464	20191.014	3254	NO			
P83931	R-1,13.5	3929 Montgomery Court	NO	YES	0.386	16799.852	3300	NO			
P78104	R-1,13.5	421 Sioux Drive	NO	YES	0.386	16817.787	3318	NO			
P83971	R-1,13.5	4211 Montgomery Place	NO	YES	0.387	16849.867	3350	NO			
P78085	R-1,13.5	511 Shoshone Drive	NO	YES	0.387	16852.150	3352	NO			
P78086	R-1,13.5	501 Shoshone Drive	NO	YES	0.387	16859.766	3360	NO			
P83247	R-1,13.5	4004 Moody Place	NO	YES	0.387	16868.752	3369	NO			
P104195	R-1,13.5	1002 S 38Th Place	NO	YES	0.387	16873.754	3374	NO			
P78099	R-1,13.5	120 Sioux Drive	NO	YES	0.387	16877.760	3378	NO			
P78100	R-1,13.5	210 Sioux Drive	NO	YES	0.388	16879.526	3380	NO			
P78101	R-1,13.5	220 Sioux Drive	NO	YES	0.388	16881.292	3381	NO			
P104187	R-1,13.5	1029 S 38Th Place	YES	YES	0.395	17197.196	3389	NO			
P53334	R-1,13.5		NO	NO	0.079	3428.926	3429	NO			
P67480	R-1,13.5	4528 Edgemont Place	NO	YES	0.389	16956.671	3457	NO			
P83161	R-1,13.5	401 N Waugh Road	NO	YES	0.390	16970.463	3470	NO			
P100768	R-1,13.5	121 Cedarwood Place	NO	YES	0.390	16987.380	3487	NO			
P100763	R-1,13.5	111 Cedarwood Place	NO	YES	0.390	16994.223	3494	NO			
P83246	R-1,13.5	4001 Moody Place	NO	YES	0.391	17021.068	3521	NO			
P81321	R-1,13.5	120 N 39Th Place	NO	YES	0.391	17044.095	3544	NO			
P104199	R-1,13.5	914 S 38Th Place	NO	YES	0.393	17110.603	3611	NO			
P83930	R-1,13.5	4001 Montgomery Court	NO	YES	0.393	17112.970	3613	NO			
P54519	R-1,13.5		NO	NO	0.084	3672.443	3672	NO			
P52516	R-1,13.5	1901 Forest Ridge Place	NO	YES	0.395	17187.690	3688	NO			
P95666	R-1,13.5	3922 Foxglove Circle	NO	YES	0.395	17194.812	3695	NO			
P81308	R-1,13.5	4016 Ridge Way	NO	YES	0.395	17222.604	3723	NO			
P81292	R-1,13.5	3821 Ridge Way	NO	YES	0.399	17380.540	3881	NO			
P100778	R-1,13.5	4325 Cedarwood Court	NO	YES	0.400	17407.164	3907	NO			
P52512	R-1,13.5	1511 Forest Ridge Place	NO	YES	0.403	17532.901	4033	NO			
P95625	R-1,13.5	4016 Wildflower Court	NO	YES	0.403	17551.560	4052	NO			
P107399	R-1,13.5	110 S 38Th Place	NO	YES	0.403	17563.018	4063	NO			
P95663	R-1,13.5	3903 Foxglove Circle	NO	YES	0.403	17570.446	4070	NO			
P54538	R-1,13.5	2921 Iroquois Drive	NO	YES	0.404	17591.841	4092	NO			
P95750	R-1,13.5	4306 Apache Drive	YES	YES	0.597	26004.954	4096	NO			
P95660	R-1,13.5	424 Lilac Drive	NO	YES	0.406	17664.706	4165	NO			
P54551	R-1,13.5	2920 Iroquois Drive	NO	YES	0.406	17686.869	4187	NO			
P52520	R-1,13.5	1611 Forest Drive	NO	YES	0.406	17697.426	4197	NO			
P78169	R-1,13.5	615 Upland Drive	NO	YES	0.406	17702.348	4202	NO			
P54537	R-1,13.5	2920 Comanche Drive	NO	YES	0.407	17726.292	4226	NO			
P54528	R-1,13.5	711 N 30Th Street	NO	YES	0.408	17754.655	4255	NO			
P83144	R-1,13.5	730 N Waugh Road	NO	YES	0.409	17815.212	4315	NO			
P95647	R-1,13.5	303 Lilac Drive	NO	YES	0.409	17819.019	4319	NO			
P95665	R-1,13.5	3914 Foxglove Circle	NO	YES	0.409	17834.759	4335	NO			
P95763	R-1,13.5	4225 Montgomery Place	NO	YES	0.410	17848.283	4348	NO			
P67495	R-1,13.5	4908 Monte Vista Place	YES	YES	0.493	21490.185	4359	NO			
P52513	R-1,13.5	2012 Windsor Drive	NO	YES	0.412	17931.737	4432	NO			
P78098	R-1,13.5	110 Sioux Drive	NO	YES	0.412	17942.313	4442	NO			
P100807	R-1,13.5	3601 Mohawk Drive	YES	YES	0.446	19408.558	4469	NO			
P52522	R-1,13.5	1521 Windsor Drive	NO	YES	0.413	17996.867	4497	NO			
P52518	R-1,13.5	1610 Forest Ridge Place	NO	YES	0.413	17997.997	4498	NO			
P27094	R-1,13.5	3625 Shoshone Drive	NO	YES	0.414	18023.019	4523	NO			
P78401	R-1,13.5	530 SIOUX DR	YES	YES	0.470	20494.337	4529	NO			
P83162	R-1,13.5	315 N Waugh Road	NO	YES	0.414	18028.672	4529	NO			
P78170	R-1,13.5	701 Upland Drive	NO	YES	0.416	18100.035	4600	NO			
P78079	R-1,13.5	3411 Mohawk Drive	NO	YES	0.416	18102.150	4602	NO			
P52527	R-1,13.5	2011 Windsor Drive	YES	YES	0.529	23027.345	4603	NO			
P24793	R-1,13.5	4529 Edgemont Place	NO	YES	0.416	18121.033	4621	NO			
P78080	R-1,13.5	3421 Mohawk Drive	NO	YES	0.416	18120.749	4621	NO			

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P83648	R-1,13.5	518 Columbine Court	NO	YES	0.416	18137.071	4637	NO			
P78091	R-1,13.5	3520 Shoshone Drive	NO	YES	0.416	18139.122	4639	NO			
P27107	R-1,13.5	609 Shoshone Drive	YES	YES	0.476	20716.586	4646	NO			
P100798	R-1,13.5	3708 Mohawk Drive	NO	YES	0.417	18170.659	4671	NO			
P83143	R-1,13.5	720 N Waugh Road	NO	YES	0.418	18201.688	4702	NO			
P54481	R-1,13.5	3410 Apache Drive	YES	YES	0.580	25269.919	4705	NO			
P100796	R-1,13.5	3618 Mohawk Drive	NO	YES	0.418	18215.635	4716	NO			
P100795	R-1,13.5	3608 Mohawk Drive	NO	YES	0.418	18222.332	4722	NO			
P100797	R-1,13.5	3702 Mohawk Drive	NO	YES	0.422	18373.677	4874	NO			
P52523	R-1,13.5	1511 Windsor Drive	NO	YES	0.424	18456.025	4956	NO			
P78161	R-1,13.5	2724 Iroquois Drive	NO	YES	0.424	18488.687	4989	NO			
P81295	R-1,13.5	3805 Ridge Way	NO	YES	0.425	18516.268	5016	NO			
P119616	R-1,13.5		NO	NO	0.116	5050.253	5050	NO			
P78163	R-1,13.5	2708 Iroquois Drive	NO	YES	0.426	18557.575	5058	NO			
P27081	R-1,13.5		NO	NO	0.117	5082.226	5082	NO			
P81332	R-1,13.5	120 N 38Th Place	NO	YES	0.427	18620.338	5120	NO			
P78399	R-1,13.5	540 Sioux Drive	YES	YES	0.545	23753.848	5124	NO			
P100794	R-1,13.5	3600 Mohawk Drive	NO	YES	0.428	18633.585	5134	NO			
P67478	R-1,13.5	4605 Monte Vista Drive	NO	YES	0.428	18641.445	5141	NO			
P52505	R-1,13.5	1611 Forest Ridge Place	NO	YES	0.428	18660.557	5161	NO			
P52519	R-1,13.5	1616 Forest Ridge Place	NO	YES	0.429	18665.574	5166	NO			
P27069	R-1,13.5	3128 E Fir Street	NO	YES	0.429	18681.484	5181	NO			
P54504	R-1,13.5	621 Comanche Drive	NO	YES	0.430	18749.438	5249	NO			
P81314	R-1,13.5	4004 Creek Place	NO	YES	0.431	18765.333	5265	NO			
P95745	R-1,13.5	4307 Apache Drive	NO	YES	0.431	18775.368	5275	NO			
P27095	R-1,13.5	3615 Shoshone Drive	NO	YES	0.431	18780.957	5281	NO			
P67512	R-1,13.5	4925 Monte Vista Place	YES	YES	0.585	25499.053	5282	NO			
P95657	R-1,13.5	412 Lilac Drive	NO	YES	0.431	18784.306	5284	NO			
P95622	R-1,13.5	4011 Wildflower Court	NO	YES	0.431	18789.696	5290	NO			
P83145	R-1,13.5	810 N Waugh Road	NO	YES	0.431	18792.396	5292	NO			
P67502	R-1,13.5	4918 Monte Vista Place	NO	YES	0.431	18796.028	5296	NO			
P81331	R-1,13.5	118 N 38Th Place	NO	YES	0.433	18878.475	5378	NO			
P100805	R-1,13.5	3617 Mohawk Drive	NO	YES	0.434	18900.000	5400	NO			
P100806	R-1,13.5	3605 Mohawk Drive	NO	YES	0.434	18902.886	5403	NO			
P81293	R-1,13.5	3815 Ridge Way	NO	YES	0.434	18916.711	5417	NO			
P95759	R-1,13.5	3910 Montgomery Court	NO	YES	0.435	18941.396	5441	NO			
P95664	R-1,13.5	3906 Foxglove Circle	NO	YES	0.436	18981.790	5482	NO			
P67501	R-1,13.5	4920 Monte Vista Place	NO	YES	0.436	19010.485	5510	NO			
P95617	R-1,13.5	429 Lilac Drive	NO	YES	0.437	19015.768	5516	NO			
P27068	R-1,13.5	3116 E Fir Street	NO	YES	0.437	19040.597	5541	NO			
P78095	R-1,13.5	121 Sioux Drive	NO	YES	0.437	19048.451	5548	NO			
P100810	R-1,13.5	3700 Mohawk Court	NO	YES	0.437	19056.956	5557	NO			
P27067	R-1,13.5	3104 E Fir Street	NO	YES	0.438	19075.598	5576	NO			
P67475	R-1,13.5	4518 Edgemont Place	NO	YES	0.438	19094.465	5594	NO			
P78094	R-1,13.5	211 Sioux Drive	NO	YES	0.439	19107.688	5608	NO			
P78093	R-1,13.5	221 Sioux Drive	NO	YES	0.440	19166.926	5667	NO			
P52506	R-1,13.5	1601 Forest Ridge Place	NO	YES	0.440	19174.496	5674	NO			
P27066	R-1,13.5	3026 E Fir Street	NO	YES	0.441	19189.320	5689	NO			
P78092	R-1,13.5	311 Sioux Drive	NO	YES	0.441	19226.338	5726	NO			
P67497	R-1,13.5	4910 Monte Vista Place	YES	YES	0.511	22268.084	5773	NO			
P52514	R-1,13.5	1520 Forest Ridge Place	NO	YES	0.442	19275.017	5775	NO			
P100808	R-1,13.5	3515 Mohawk Drive	YES	YES	0.499	21743.017	5779	NO			
P67482	R-1,13.5	4615 Monte Vista Drive	NO	YES	0.443	19298.090	5798	NO			
P78164	R-1,13.5	505 Upland Drive	NO	YES	0.443	19298.479	5798	NO			
P52521	R-1,13.5	1601 Forest Drive	NO	YES	0.444	19346.632	5847	NO			
P67503	R-1,13.5	4928 Monte Vista Drive	YES	YES	0.491	21396.244	5857	NO			
P104180	R-1,13.5	3720 Broadway Street	NO	YES	0.444	19360.287	5860	NO			

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P27062	R-1,13.5	510 Shady Lane	YES	YES	0.456	19847.002	5936	NO			
P83147	R-1,13.5	705 N Waugh Road	NO	YES	0.447	19470.306	5970	NO			
P52504	R-1,13.5	1911 Forest Drive	NO	YES	0.448	19496.634	5997	NO			
P54521	R-1,13.5	3110 Cherokee Lane	NO	YES	0.448	19498.131	5998	NO			
P54509	R-1,13.5	3111 Cherokee Lane	NO	YES	0.448	19500.419	6000	NO			
P95658	R-1,13.5	416 Lilac Drive	NO	YES	0.450	19588.423	6088	NO			
P52503	R-1,13.5	1921 Forest Drive	NO	YES	0.450	19593.255	6093	NO			
P54520	R-1,13.5	3100 Cherokee Lane	NO	YES	0.450	19603.839	6104	NO			
P104191	R-1,13.5	1018 S 38Th Place	NO	YES	0.451	19660.725	6161	NO			
P78165	R-1,13.5	525 Iroquois Drive	NO	YES	0.456	19841.861	6342	NO			
P52508	R-1,13.5	1910 Forest Ridge Place	NO	YES	0.457	19916.219	6416	NO			
P78090	R-1,13.5	3510 Shoshone Drive	NO	YES	0.458	19941.949	6442	NO			
P78078	R-1,13.5	3401 Mohawk Drive	YES	YES	0.504	21937.552	6484	NO			
P54503	R-1,13.5	701 Comanche Drive	NO	YES	0.459	20007.253	6507	NO			
P105100	R-1,13.5	4521 Edgemont Place	YES	YES	0.470	20467.095	6652	NO			
P67483	R-1,13.5	4701 Monte Vista Drive	NO	YES	0.463	20160.898	6661	NO			
P83146	R-1,13.5	715 N Waugh Road	NO	YES	0.464	20203.100	6703	NO			
P54522	R-1,13.5	3120 CHEROKEE LN	NO	YES	0.465	20236.542	6737	NO			
P78096	R-1,13.5	111 Sioux Drive	NO	YES	0.465	20253.122	6753	NO			
P67489	R-1,13.5	MONTE VISTA	YES	NO	0.495	21557.070	6799	NO			
P24791	R-1,13.5	4611 Edgemont Place	NO	YES	0.466	20300.686	6801	NO			
P67484	R-1,13.5	4626 Monte Vista Drive	NO	YES	0.466	20302.905	6803	NO			
P52515	R-1,13.5	1911 Forest Ridge Place	NO	YES	0.467	20321.061	6821	NO			
P54518	R-1,13.5	3030 Cherokee Lane	NO	YES	0.470	20460.616	6961	NO			
P100804	R-1,13.5	3701 Mohawk Drive	NO	YES	0.471	20501.671	7002	NO			
P54466	R-1,13.5	620 N 30Th Street	NO	YES	0.473	20582.912	7083	NO			
P53319	R-1,13.5	2400 Alison Avenue	NO	YES	0.473	20586.300	7086	NO			
P100809	R-1,13.5	3610 Mohawk Drive	NO	YES	0.473	20610.565	7111	NO			
P67491	R-1,13.5		YES	NO	0.465	20235.908	7159	NO			
P54510	R-1,13.5	3101 Cherokee Lane	NO	YES	0.475	20674.712	7175	NO			
P54508	R-1,13.5	3119 Cherokee Lane	NO	YES	0.476	20727.200	7227	NO			
P52507	R-1,13.5	1906 Forest Ridge Place	NO	YES	0.477	20770.014	7270	NO			
P54502	R-1,13.5	711 Comanche Drive	NO	YES	0.477	20770.496	7270	NO			
P83252	R-1,13.5	4030 Moody Place	NO	YES	0.478	20810.094	7310	NO			
P54498	R-1,13.5	3200 E Fir Street	NO	YES	0.479	20857.525	7358	NO			
P52490	R-1,13.5	1720 Windsor Drive	NO	YES	0.480	20907.959	7408	NO			
P52497	R-1,13.5	1808 Forest Drive	NO	YES	0.482	21008.951	7509	NO			
P52498	R-1,13.5	1816 Forest Drive	NO	YES	0.482	21011.145	7511	NO			
P52499	R-1,13.5	1900 Forest Drive	NO	YES	0.482	21013.339	7513	NO			
P52500	R-1,13.5	1906 Forest Drive	NO	YES	0.482	21015.533	7516	NO			
P52501	R-1,13.5	1910 Forest Drive	NO	YES	0.483	21017.727	7518	NO			
P95656	R-1,13.5	404 Lilac Drive	NO	YES	0.484	21091.851	7592	NO			
P78088	R-1,13.5	421 Shoshone Drive	NO	YES	0.487	21202.761	7703	NO			
P52517	R-1,13.5	1600 Forest Ridge Place	NO	YES	0.487	21214.565	7715	NO			
P53325	R-1,13.5	808 Addison Place	YES	NO	0.301	13102.899	7724	NO			
P95623	R-1,13.5	4005 Wildflower Court	NO	YES	0.489	21306.839	7807	NO			
P81333	R-1,13.5	119 N 38Th Place	NO	YES	0.490	21333.513	7834	NO			
P95662	R-1,13.5	3909 Foxglove Circle	NO	YES	0.491	21388.587	7889	NO			
P67488	R-1,13.5	4716 Monte Vista Drive	NO	YES	0.495	21561.604	8062	NO			
P78110	R-1,13.5		NO	NO	0.186	8086.591	8087	NO			
P54505	R-1,13.5	601 Comanche Drive	NO	YES	0.500	21793.153	8293	NO			
P100792	R-1,13.5	3723 Shoshone Drive	NO	YES	0.502	21861.863	8362	NO			
P100790	R-1,13.5	3718 Shoshone Drive	NO	YES	0.506	22047.020	8547	NO			
P81324	R-1,13.5	123 N 39Th Place	NO	YES	0.507	22100.878	8601	NO			
P54468	R-1,13.5	3020 Comanche Drive	NO	YES	0.508	22134.364	8634	NO			
P67514	R-1,13.5	4921 Monte Vista Place	YES	YES	0.512	22303.822	8761	NO			
P54497	R-1,13.5	3210 E Fir Street	NO	YES	0.513	22330.904	8831	NO			

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P67481	R-1,13.5	4616 Edgemont Place	NO	YES	0.513	22353.608	8854	NO			
P67476	R-1,13.5		YES	YES	0.533	23210.280	8907	NO			
P54467	R-1,13.5	3010 Comanche Drive	NO	YES	0.518	22546.022	9046	NO			
P95990	R-1,13.5	125 Lilac Drive	NO	YES	0.518	22546.906	9047	NO			
P54494	R-1,13.5	3311 Apache Drive	NO	YES	0.519	22607.328	9107	NO			
P52538	R-1,13.5	1721 Windsor Drive	NO	YES	0.520	22672.491	9172	NO			
P100799	R-1,13.5	3712 Mohawk Drive	NO	YES	0.522	22739.575	9240	NO			
P67499	R-1,13.5	4916 Monte Vista Place	NO	YES	0.524	22807.055	9307	NO			
P54484	R-1,13.5	800 Apache Drive	NO	YES	0.525	22871.275	9371	NO			
P52502	R-1,13.5	1920 Forest Drive	NO	YES	0.526	22913.351	9413	NO			
P83130	R-1,13.5	510 N Waugh Road	NO	YES	0.535	23300.743	9801	NO			
P100791	R-1,13.5	3724 Shoshone Drive	NO	YES	0.536	23360.489	9860	NO			
P54486	R-1,13.5	820 Apache Drive	YES	YES	0.549	23907.659	9896	NO			
P119360	R-1,13.5		YES	NO	0.638	27776.366	10015	NO			
P54501	R-1,13.5	721 Comanche Drive	NO	YES	0.545	23723.688	10224	NO			
P119363	R-1,13.5		YES	YES	0.642	27952.669	10252	NO			
P54485	R-1,13.5	810 Apache Drive	NO	YES	0.547	23818.236	10318	NO			
P54523	R-1,13.5	3130 Cherokee Lane	NO	YES	0.549	23909.656	10410	NO			
P54506	R-1,13.5	3131 Cherokee Lane	NO	YES	0.549	23914.398	10414	NO			
P81312	R-1,13.5	4013 Creek Place	NO	YES	0.552	24052.981	10553	NO			
P83132	R-1,13.5	530 N Waugh Road	NO	YES	0.553	24100.593	10601	NO			
P83617	R-1,13.5	612 LILAC DRIVE	NO	YES	0.555	24182.357	10682	NO			
P78084	R-1,13.5	521 Shoshone Drive	NO	YES	0.557	24247.396	10747	NO			
P52491	R-1,13.5	1610 Forest Drive	NO	YES	0.559	24364.325	10864	NO			
P52509	R-1,13.5	1920 Forest Ridge Place	NO	YES	0.567	24697.184	11197	NO			
P52510	R-1,13.5	1531 Forest Ridge Place	NO	YES	0.567	24706.257	11206	NO			
P95991	R-1,13.5	117 Lilac Drive	NO	YES	0.567	24715.232	11215	NO			
P67513	R-1,13.5	4827 Monte Vista Place	NO	YES	0.569	24767.902	11268	NO			
P67511	R-1,13.5	4809 Monte Vista Place	NO	YES	0.569	24777.543	11278	NO			
P54507	R-1,13.5	3125 Cherokee Lane	NO	YES	0.570	24825.784	11326	NO			
P54488	R-1,13.5	801 Apache Drive	NO	YES	0.571	24871.812	11372	NO			
P52493	R-1,13.5	1800 Forest Drive	NO	YES	0.575	25065.463	11565	NO			
P54517	R-1,13.5	3020 Cherokee Lane	NO	YES	0.578	25166.787	11667	NO			
P67472	R-1,13.5		YES	NO	0.462	20135.862	11708	NO			
P54478	R-1,13.5	700 Comanche Drive	NO	YES	0.580	25245.116	11745	NO			
P96004	R-1,13.5	301 Lilac Drive	NO	YES	0.580	25277.006	11777	NO			
P100800	R-1,13.5	3709 Mohawk Drive	NO	YES	0.583	25380.886	11881	NO			
P54524	R-1,13.5	3111 Comanche Drive	NO	YES	0.587	25560.138	12060	NO			
P96001	R-1,13.5	230 LILAC DRIVE	NO	YES	0.596	25953.117	12453	NO			
P54473	R-1,13.5	3200 Comanche Drive	NO	YES	0.603	26248.158	12748	NO			
P54474	R-1,13.5	3210 Comanche Drive	NO	YES	0.603	26248.153	12748	NO			
P54512	R-1,13.5	3031 Cherokee Lane	NO	YES	0.612	26649.449	13149	NO			
P90542	R-1,13.5	4223 Lupine Drive	NO	YES	0.613	26691.019	13191	NO			
P95999	R-1,13.5	218 Lilac Drive	YES	YES	0.634	27622.851	13287	NO			
P100789	R-1,13.5	3712 Shoshone Drive	YES	YES	0.749	32647.874	13305	NO			
P52537	R-1,13.5	1510 Windsor Drive	YES	YES	0.655	28539.784	13359	NO			
P83935	R-1,13.5	3921 Montgomery Court	NO	NO	0.310	13496.439	13496	NO			
P54495	R-1,13.5	3301 Apache Drive	NO	YES	0.622	27113.719	13614	NO			
P90544	R-1,13.5	4211 Lupine Drive	NO	YES	0.625	27223.441	13723	NO			
P107395	R-1,13.5	3824 Moody Court	NO	YES	0.626	27250.016	13750	NO			
P27114	R-1,13.5	804 N 30Th Street	NO	YES	0.626	27266.307	13766	NO			
P78400	R-1,13.5	530 Sioux Drive	YES	YES	0.648	28218.599	13832	NO			
P96002	R-1,13.5	300 Lilac Drive	NO	YES	0.639	27846.990	14347	NO			
P54513	R-1,13.5	3021 Cherokee Lane	NO	YES	0.641	27916.329	14416	NO			
P99218	R-1,13.5	3710 Mohawk Court	NO	YES	0.648	28219.290	14719	NO			
P54482	R-1,13.5	3420 Apache Drive	NO	YES	0.663	28868.025	15368	NO			
P78089	R-1,13.5	411 Shoshone Drive	NO	YES	0.664	28944.398	15444	NO			

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P54515	R-1,13.5	3010 Cherokee Lane	NO	YES	0.665	28972.245	15472	NO			
P54527	R-1,13.5	3011 Comanche Drive	NO	YES	0.666	29016.565	15517	NO			
P54525	R-1,13.5	3025 Comanche Drive	NO	YES	0.673	29294.662	15795	NO			
P54472	R-1,13.5	3110 Comanche Drive	NO	YES	0.676	29425.170	15925	NO			
P105884	R-1,13.5	418 38Th Place	NO	YES	0.681	29683.413	16183	NO			
P54514	R-1,13.5	3020 E Fir Street	NO	YES	0.688	29981.395	16481	NO			
P95997	R-1,13.5	206 Lilac Drive	YES	YES	0.783	34090.041	17650	NO			
P81337	R-1,13.5	115 N 39Th Place	YES	YES	0.813	35424.486	18999	NO			
P52524	R-1,13.5	1812 Windsor Drive	NO	YES	0.749	32627.309	19127	NO			
P99219	R-1,13.5	3704 Mohawk Drive	NO	YES	0.776	33823.986	20324	NO			
P119362	R-1,13.5		NO	NO	0.507	22065.197	22065	NO			
P54477	R-1,13.5	3312 Mohawk Drive	NO	YES	0.819	35659.498	22159	NO			
P54511	R-1,13.5	3035 Cherokee Lane	NO	YES	0.828	36068.646	22569	NO			
P54475	R-1,13.5	3300 Comanche Drive	NO	YES	0.833	36293.730	22794	NO			
P54479	R-1,13.5	3310 Apache Drive	NO	YES	0.860	37458.132	23958	NO			
P81339	R-1,13.5	119 N 39Th Place	NO	YES	0.860	37471.803	23972	NO			
P52526	R-1,13.5	1510 Forest Ridge Place	NO	YES	0.897	39067.482	25567	NO			
P67487	R-1,13.5	4700 Monte Vista Drive	YES	YES	0.995	43358.647	26614	NO			
P95989	R-1,13.5	121 Lilac Drive	NO	YES	0.941	40979.385	27479	NO			
P119033	R-1,13.5		YES	NO	0.767	33391.558	27526	NO			
P96003	R-1,13.5	304 Lilac Drive	NO	YES	1.047	45606.456	32106	NO			
P83165	R-1,13.5		NO	NO	1.199	52220.065	52220	NO			
P24790	R-1,13.5	1427 MONTE VISTA DRIVE	YES	YES	3.181	138542.856	103775	NO			
P67473	R-1,13.5	4428 Edgemont Place	YES	YES			NO				
P78076	R-1,13.5		NO	NO	0.311	13552.985	13553	YES		1	1
P96005	R-1,13.5	227 Lilac Drive	NO	YES	0.621	27068.699	13569	YES	1		1
P83646	R-1,13.5	514 Columbine Court	NO	NO	0.312	13572.817	13573	YES		1	1
P78168	R-1,13.5		NO	NO	0.313	13620.146	13620	YES		1	1
P105889	R-1,13.5	3824 Ridge Court	NO	NO	0.314	13661.774	13662	YES		1	1
P105915	R-1,13.5	411 S 38Th Place	NO	NO	0.314	13668.042	13668	YES		1	1
P105916	R-1,13.5	417 S 38Th Place	NO	NO	0.314	13684.123	13684	YES		1	1
P105920	R-1,13.5	517 S 38Th Place	NO	NO	0.316	13758.304	13758	YES		1	1
P105919	R-1,13.5	509 S 38Th Place	NO	NO	0.316	13760.587	13761	YES		1	1
P105918	R-1,13.5	501 38Th Place	NO	NO	0.317	13793.208	13793	YES		1	1
P95618	R-1,13.5	423 Lilac Drive	NO	NO	0.317	13801.522	13802	YES		1	1
P100774	R-1,13.5		NO	NO	0.320	13923.117	13923	YES		1	1
P83965	R-1,13.5	4223 Montgomery Place	NO	NO	0.325	14163.253	14163	YES		1	1
P67494	R-1,13.5		NO	NO	0.327	14251.533	14252	YES		1	1
P105882	R-1,13.5	426 S 38Th Place	NO	NO	0.327	14255.836	14256	YES		1	1
P95619	R-1,13.5		NO	NO	0.327	14259.898	14260	YES		1	1
P79430	R-1,13.5		NO	NO	0.334	14560.060	14560	YES		1	1
P100764	R-1,13.5		NO	NO	0.339	14771.165	14771	YES		1	1
P95648	R-1,13.5	628 Honeysuckle Drive	NO	NO	0.349	15205.450	15205	YES		1	1
P67504	R-1,13.5		NO	NO	0.360	15676.271	15676	YES		1	1
P52535	R-1,13.5	1801 Windsor Drive	NO	NO	0.366	15958.899	15959	YES		1	1
P100793	R-1,13.5	3713 Shoshone Drive	NO	YES	0.681	29651.849	16152	YES	1		1
P54493	R-1,13.5	3310 E Fir Street	YES	YES	0.792	34504.086	16345	YES	1		1
P95764	R-1,13.5		NO	NO	0.377	16407.757	16408	YES		1	1
P27539	R-1,13.5	4000 E Division Street	NO	YES	0.693	30203.978	16704	YES	1		1
P54470	R-1,13.5	3030 Comanche Drive	NO	YES	0.707	30788.551	17289	YES	1		1
P54500	R-1,13.5	801 Comanche Drive	NO	YES	0.721	31399.706	17900	YES	1		1
P95661	R-1,13.5		NO	NO	0.417	18157.924	18158	YES		1	1
P95995	R-1,13.5	130 Lilac Drive	NO	YES	0.748	32599.506	19100	YES	1		1
P95993	R-1,13.5	122 Lilac Drive	NO	YES	0.757	32954.287	19454	YES	1		1
P95994	R-1,13.5	126 Lilac Drive	NO	YES	0.761	33144.236	19644	YES	1		1
P54499	R-1,13.5	811 Comanche Drive	NO	YES	0.771	33564.898	20065	YES	1		1
P95652	R-1,13.5	310 Lilac Drive	NO	NO	0.465	20254.497	20254	YES		1	1

PNUMBER	ZONING	ADDRESS	CRITICAL AREAS PRESENT?	EXISTING STRUCTURES	ACRES	SQUARE FEET	SQUARE FEET LEFT OVER AFTER B.L. METHODOLOGY UTILIZED ¹	BUILDABLE AFTER ANALYSIS USING B.L. METHODOLOGY ¹	ADDITIONAL UNITS ON LOTS W/EXISTING STRUCTURES	# OF UNITS ON VACANT LOTS	# OF ADDITIONAL UNITS @ 4 DU/ACRE	
P52511	R-1,13.5		NO	NO	0.489	21292.183	21292	YES		1	1	
P90541	R-1,13.5	4220 Lupine Drive	NO	YES	0.803	34968.061	21468	YES	1		1	
P95992	R-1,13.5	118 Lilac Drive	NO	YES	0.817	35608.643	22109	YES	1		2	
P95659	R-1,13.5	420 Lilac Drive	NO	NO	0.527	22968.933	22969	YES		1	2	
P54496	R-1,13.5	806 Comanche Drive	NO	YES	0.843	36718.460	23218	YES	1		2	
P100788	R-1,13.5	3706 Shoshone Drive	YES	YES	0.930	40499.694	23718	YES	1		2	
P78083	R-1,13.5	601 Shoshone Drive	NO	NO	0.549	23901.187	23901	YES		1	2	
P83618	R-1,13.5	614 Lilac Drive	NO	NO	0.551	24000.700	24001	YES		1	2	
P95988	R-1,13.5	4210 Lupine Drive	NO	YES	0.866	37743.612	24244	YES	1		2	
P96007	R-1,13.5	215 Lilac Drive	NO	YES	0.867	37787.507	24288	YES	1		2	
P105103	R-1,13.5	4525 Edgemont Place	YES	YES	1.264	55067.530	25056	YES	1		2	
P52492	R-1,13.5	1620 Forest Drive	NO	YES	0.890	38779.010	25279	YES	1		2	
P96000	R-1,13.5	224 Lilac Drive	NO	NO	0.587	25567.357	25567	YES		1	2	
P110397	R-1,13.5		NO	NO	0.606	26390.218	26390	YES		1	2	
P27070	R-1,13.5	610 N 30Th Street	NO	YES	0.919	40020.611	26521	YES	1		2	
P54483	R-1,13.5	3500 Apache Drive	NO	YES	0.925	40301.168	26801	YES	1		2	
P95998	R-1,13.5	212 Lilac Drive	YES	NO	0.689	30032.941	26907	YES		1	2	
P95996	R-1,13.5	200 Lilac Drive	NO	YES	0.929	40474.252	26974	YES	1		2	
P81338	R-1,13.5	117 N 39th Place	YES	NO	0.702	30589.531	28176	YES		1	2	
P96008	R-1,13.5	209 Lilac Drive	NO	YES	0.988	43054.871	29555	YES	2		2	
P54526	R-1,13.5	3021 Comanche Drive	NO	YES	0.989	43066.079	29566	YES	1		2	
P27124	R-1,13.5		NO	YES	1.000	43576.942	30077	YES	2		2	
P54476	R-1,13.5	3310 Comanche Drive	NO	YES	1.010	44003.003	30503	YES	1		2	
P54471	R-1,13.5	3100 Comanche Drive	NO	YES	1.013	44142.107	30642	YES	1		2	
P81340	R-1,13.5	121 N 39Th Place	NO	YES	1.035	45064.798	31565	YES	1		2	
P96006	R-1,13.5	221 LILAC DRIVE	NO	NO	0.739	32178.904	32179	YES	1		2	
P54487	R-1,13.5	821 Apache Drive	YES	YES	1.441	62751.102	32566	YES	2		2	
P67496	R-1,13.5		NO	NO	0.788	34314.765	34315	YES	2		3	
P67498	R-1,13.5	4912 Monte Vista Place	NO	YES	1.155	50305.934	36806	YES	1		3	
P95653	R-1,13.5	310 Lilac Drive	YES	YES	1.436	62538.188	38791	YES	2		3	
P27112	R-1,13.5	3720 Mohawk Court	NO	YES	3.033	132127.692	118628	YES	2		3	
P81325	R-1,13.5		NO	NO	0.458	19930.258	19930	YES		1	1	
TOTALS:												
830 parcels					336.961	14678135.624			39	32	71	98
									# of additional lots that can be created	# of vacant buildable lots	Total # of Lots at 3.23 du/acre	Total # of Lots that can be created at 4 du/acre

¹ See Appendix LU-B for the full text of the Buildable Lands methodology that describes in detail how it was determined that additional lots could be created on parcels.



APPENDIX B

**Buildable Lands and Land Capacity Analysis
2016**



City of
**MOUNT
VERNON**



APPENDIX A LAND USE ELEMENT

Buildable Lands & Land Capacity Analysis

2016 - 2036

The City's analysis showing that the 20-year housing and employment growth can be accommodated within the City consistent with RCW 36.70A.115

1.0

INTRODUCTION

Mount Vernon is a jurisdiction that is required to plan under the State’s Growth Management Act (GMA). This state law, in part, states that the City shall “... provide *sufficient capacity of land* suitable for development...to accommodate (the City’s) *allocated housing and employment growth*...consistent with the twenty-year population forecast from the office of financial management” (RCW 36.70A.115).

This document is the work product showing that the City has sufficient capacity of land suitable for development to accommodate our allocated housing. This document also quantifies how little commercial and industrial land the City has that is available for future development - underscoring how important it is for the City to proceed with caution when making land use decisions that could further impact this limited resource.

In 2005 the City completed its first Buildable Lands Analysis. This first analysis was updated in 2010; and now is being updated once again. The City is not required by the Growth Management Act (GMA) to complete a buildable lands analysis like some jurisdictions are; however, the City feels strongly that the only way to plan for the City’s growth is to have an accurate account of the existing land that is developed, and an inventory of the land available for development.

After looking at the way in which other jurisdictions in the State have inventoried their buildable lands, the City devised a methodology and data collection system that is described in the following sections. The methodology utilizes what was deemed the best available information that reasonable methodological assumptions were derived from.

This document is organized into the following sections:

- 1.0 Introduction
- 2.0 Growth Targets
- 3.0 Residential Growth
- 4.0 Commercial & Industrial Growth
- 5.0 Public Lands
- 6.0 Critical Areas
- 7.0 Results & Conclusions

2.0

GROWTH TARGETS

The Growth Management Act (GMA) planning process requires that the City coordinate with all of the Skagit County jurisdictions to first determine what the overall growth targets, in terms of population and jobs, will be. Once the overall targets are determined both the population and jobs are allocated to each jurisdiction. Each jurisdiction, in turn, is required to show how they can accommodate this growth.

This document is an Appendix to the Land Use Element (Chapter 2) of the City’s Comprehensive Plan. The Land Use Element contains a detailed description of how and why the following population and employment targets were adopted for Mount Vernon. Table 1.0, below, contains a summary of the overall population and employment targets. Table 1.1 takes the population target and converts it to housing units by dividing the population target by 2.76; which is the average household size for Mount Vernon according to the 2010 U.S. Census Bureau.

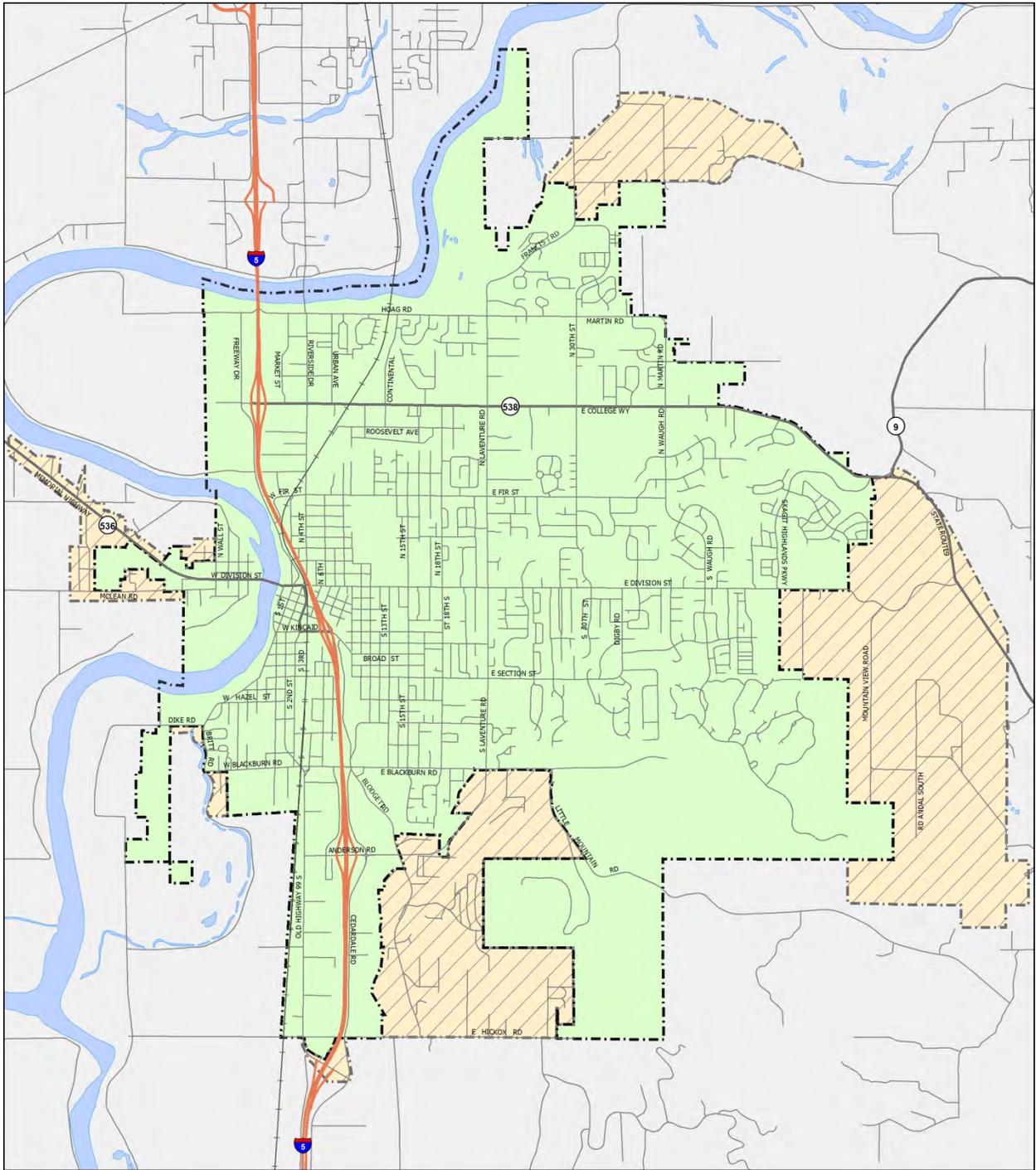
Map 1.0 identifies the limits the current City limits and the City’s Urban Growth Areas (UGAs).

TABLE 1.0: GROWTH TARGETS

	2015 EXISTING	2016 to 2036 GROWTH	2016 to 2036 TARGET
Population	33,530	11,842	46,811
Employment	16,503	4,558	21,061

TABLE 1.1: POPULATION TO HOUSING

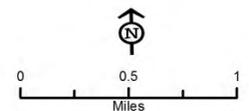
2016 to 2036 POPULATION	POPULATION to HOUSING	HOUSING T ARGET
11,842	÷ 2.76	4,290 units



Map 1.0 - City Boundaries and Urban Growth Areas (UGA)



- City Boundary
- UGA Boundary
- Water Body
- Interstate Highway
- State Highway
- City/County Street
- Railroad



Map by MV GIS 3/31/2016

3.0

RESIDENTIAL ZONES

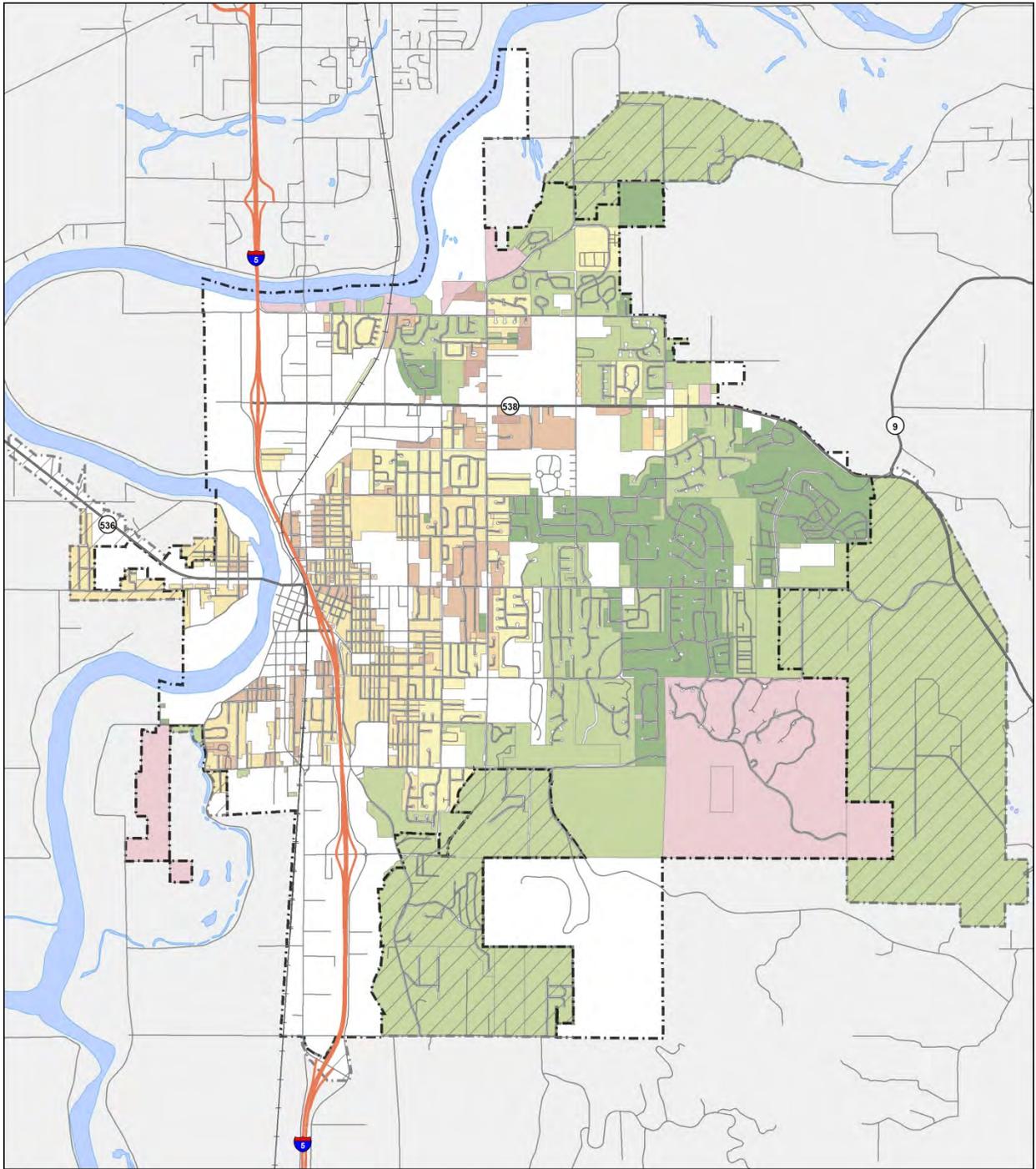
The City has nine (9) residential zoning districts that provide for a variety of densities and lot sizes. The zones that predominantly provide for single-family residential structures are the Residential Agricultural (R-A), Single-Family Residential Districts (R-1), and Residential-Office (R-O) Districts. The Duplex and Townhouse (R-2), and Multi-Family Residential (R-3 and R-4) districts provide for duplexes and multi-family structures. Table 1.2 lists these zones along with their respective maximum densities that are allowed according to the City’s zoning code.



To begin the analysis of the residential zones the following bulleted list of data was collected. All of this data was analyzed using geographic Information System (GIS) software.

- Skagit County Assessor’s tax parcels;
- Aerial photography produced in the Spring of 2013 and 2015;
- Zoning and Comprehensive Plan designations;
- Maximum density allowed per the parcel’s zoning designation;
- Minimum lot size allowed per the parcel’s zoning designation (if applicable);
- Parcel size;
- Existence of existing dwelling units; and,
- Approximate square footage of critical areas including wetlands, streams, floodways or areas of geologic hazard, and their associated buffers. Please see the section labeled: *Critical Areas and their Buffers*, for additional information on how these areas were identified and quantified.

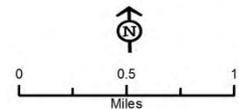
Map 2.0 identifies the location of the City’s different residential zoning districts.



Map 2.0 - Residential Zones



- | | | | | |
|---------------|----------------------------|---------|-----|--|
| City Boundary | Zoning Designations | R-1,5.0 | R-3 | Comprehensive Plan Designations |
| UGA Boundary | R-1,3.0 | R-1,7.0 | R-4 | Medium Density SF (R-1, 4.0) |
| | R-1,4.0 | R-2 | R-A | High Density SF (R-1, 7.0) |
| | | | R-O | |



Map by MV GIS 3/31/2016

3.1: SINGLE-FAMILY RESIDENTIAL ZONES

Once the above-listed data was collected for the single-family residential zones the square footage of any critical areas (plus their associated buffers) was netted out of the gross square footage of these parcels. After this area was netted out of these parcels the remaining square footage of these parcels was multiplied by the maximum density allowed according to their zoning or Comprehensive Plan designations. This was done to separate out parcels that could be further developed with either a short plat or a standard plat.

A short plat allows up to nine (9) lots to be created whereas a standard plat allows the creation of ten (10) or more lots. It was important to differentiate between these two developments potentials (short plat versus the standard plat) because different assumptions regarding future infrastructure needed to be made between these different types of subdivisions.

TABLE 1.2: RESIDENTIAL ZONES

SINGLE-FAMILY ZONES		MULTI-FAMILY ZONES		OTHER RESIDENTIAL ZONES	
Zone	Max. Density	Zone	Max. Density	Zone	Max. Density
R-1, 7.0	7.26 du/acre	R-2	10 du/acre	R-A	1.24 du /acre
R-1, 5.0	5.73 du/acre	R-3	15 du/acre	R-O	9.68 du/acre
R-1, 4.0	4.54 du/acre	R-4	20 du/acre		
R-1, 3.0	3.23 du/acre				

If nine (9) or fewer lots resulted after the critical areas/buffers were deducted, an additional five percent (5%) of the net lot area was also subtracted out to account for stormwater facilities necessary on short plats. If ten (10) or more lots resulted after the critical areas/buffer areas were deducted, an additional twenty-five percent (25%) of the net site area was subtracted to account for necessary road rights-of-way and stormwater facilities. After either the five percent (5%) or twenty-five percent (25%) were subtracted out the net parcel areas were again multiplied by the densities allowed per their respective zoning designations outlined within Table 1.2, above.

The threshold of nine (9) lots was chosen as the City allows short plats up to nine (9) lots and the Mount Vernon Municipal Code (MVMC) allows private streets to serve short plat developments. Private streets are allowed to be located within easements and the area of the private street is part of the lot that is created; thus the square footage for the private roadways does not need to be netted out of the developable area of short plats.

Attached within Appendix 1 is a list of 18 different short plats that have either received preliminary or final approval between 2005 and 2015. The average percent of these plats that was found to be encumbered with stormwater facilities was .41%. This percentage is so low because most of these plats did not require stormwater facilities at all; or the facilities that they install were underground vaults that did not take up surface square footage within the plat.

The five percent (5%) of the net site area that is being subtracted out of the short plat parcels was arrived at by taking into consideration the 2005 stormwater standards that the City adopted and begin implementing in 2009 that have the potential for making open stormwater ponds larger than they had historically been under previous stormwater standards. However, there are many innovative techniques that developers are able to utilize, such as Low Impact Development (LID) that will help keep the size of new stormwater ponds manageable.

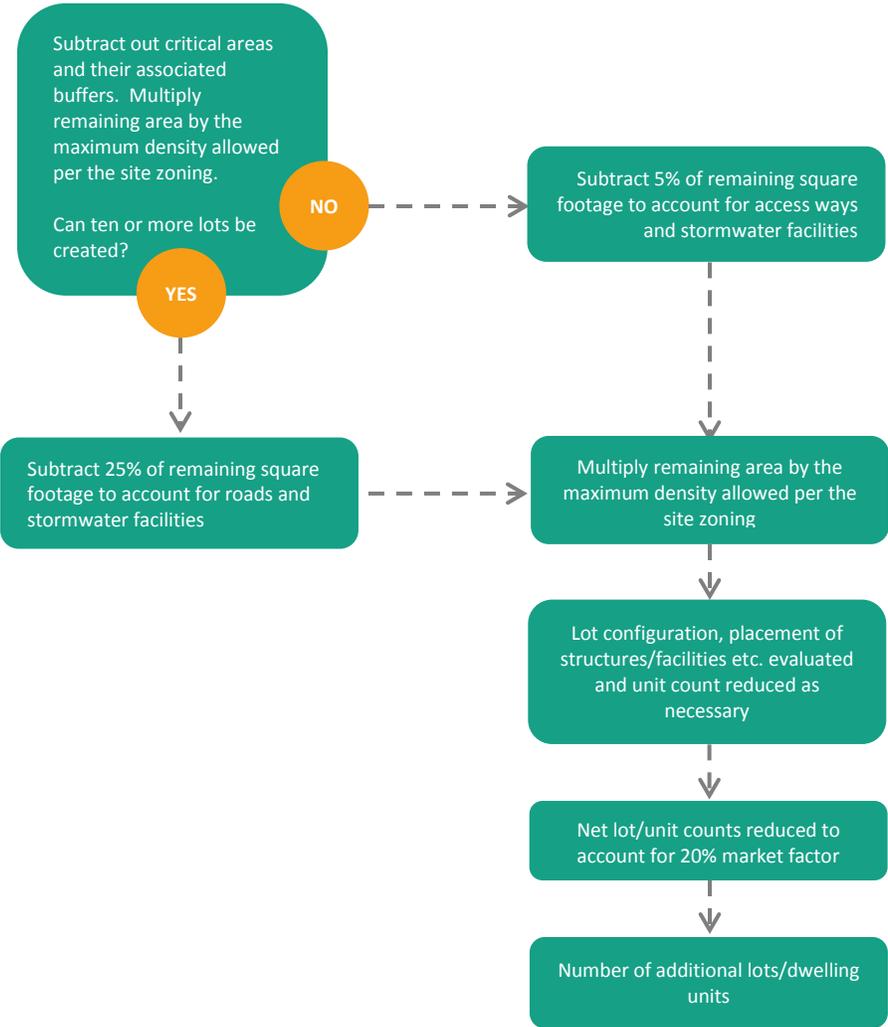
As stated above, if ten (10) or more lots could be created after subtracting out the critical areas/buffer areas, an additional twenty-five percent (25%) of the net site area was subtracted out of the parcel to account for necessary road rights-of-way and stormwater facilities.

The twenty-five percent (25%) figure for the roads and stormwater facilities figure was determined by looking at the streets and detention areas needed to serve 26 different plats located throughout the City. The plats that were analyzed are listed in Table 2 found in the accompanying Appendix 1.

Evaluation of these 26 plats showed that the average road right-of-way was nearly sixteen percent (15.7%) of the overall plat; and that close to five percent (4.9%) of the area within the plats were encumbered with stormwater facilities. Similar to the process for the additional land subtracted for short plats; the overall average for the future roads and stormwater facilities was increased from the historic average (when combined) of almost twenty-one percent (21%) to twenty-five percent (25%) to account for the new stormwater standards that the City is currently administering.

For illustrative purposes, on the following page is a simplified flow chart that identifies the steps that were taken in determining the potential new housing units that could be developed in the City.

RESIDENTIAL
Plats, Short Plats & Multi-Family Development



3.2: MULTI-FAMILY RESIDENTIAL ZONES

The City has three (3) zoning districts that predominately provide for duplexes and multi-family structures. These include the Duplex and Townhouse Residential District (R-2), and the Multi-Family Residential Districts (R-3) and (R-4).

For these zoning districts the same baseline data (aerial photography, parcel map, land use designations, critical area and buffers, et cetera) was collected and tabulated as was done for the single-family designated parcels. On parcels without existing dwelling units the overall lot size of these parcels and subtracted out the wetland, stream, floodway, steep slopes and all of their associated buffers and then deducted an additional five percent (5%) of the net site area to account for access ways and stormwater facilities on these sites. The remaining net lot sizes were then multiplied it by the densities listed in Table 1.2.

The five percent (5%) figure for the access ways and stormwater facilities was chosen by looking at the different configurations available for multi-family development. Unlike single-family zoning districts, the multi-family districts allow the density available in these zones to be clustered in many different ways by incorporating parking under structures, or by stacking units. For this reason a smaller percent was chosen than what was used for the single-family plats of ten (10) or more lots.

For parcels in the R-2, R-3, and R-4 districts that already had existing structures the number of existing multi-family dwelling units was tabulated, and checked against the densities used in Table 1.2 to see if additional units could be placed on these parcels. If additional density could be placed on these parcels, the critical areas and their associated buffers, five percent (5%) to account for new access ways and stormwater facilities, along with the square footage needed for the number of existing dwelling units was subtracted out. Then the net parcel square footage was multiplied by the density outlined in Table 1.2.

3.3: OTHER RESIDENTIAL CONSIDERATIONS

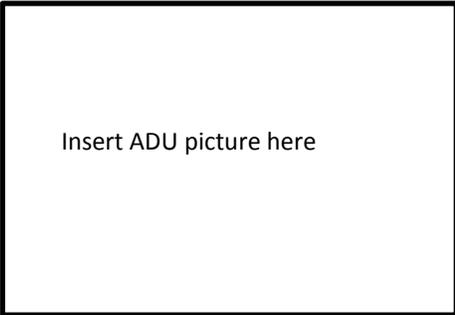
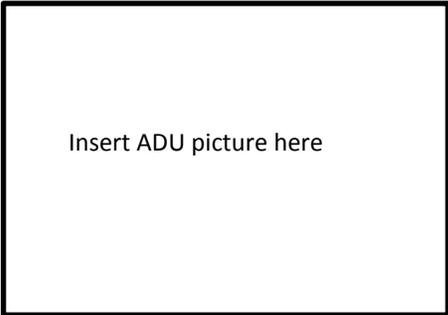
There were a number of other considerations that went into determining the final potential number of additional residential housing units that could be created in the City. Each of these considerations is explained below.

PLACEMENT OF EXISTING STRUCTURES. Regardless of how many additional lots could be created on a parcel, all residentially zoned parcels were evaluated to make sure that the placement of the existing structure(s), the parcel geometry, and location of on-site critical areas and their associated buffers did not preclude additional development on the parcel. There were over 300 parcels within the Residential zones where further development was not possible because the existing structure(s) were placed in a way (generally near the middle of the parcel) making it impossible to subdivide and construct another home; or due to the geometry of the parcel or the location of the critical areas and their buffers. In these cases the number of potential lots was adjusted down to reflect the actual, anticipated potential development. The importance of evaluating the placement of existing structures is illustrated in the two pictures below. In the picture to the left the house is placed in such a way that an additional lot could be created. The picture to the right shows that if this existing home is moved closer to the middle of the parcel it makes the creation of an additional lot impossible.



ACCESSORY DWELLING UNITS AND DUPLEXES. The City’s zoning code allows for the construction of both accessory dwelling units (ADUs) and duplexes in single-family residential zones. ADUs, sometimes referred to as ‘mother-in-law apartments’ can be constructed/created by altering the interior space of an existing dwelling unit, converting an attic, basement, garage or other previously uninhabited portion of a dwelling, adding an attached living area onto an existing dwelling, or constructing a detached living area. Duplexes are allowed in single-family residential zones through different land use processes.

From 2000 to 2015 the City approved a total of 50 ADUs and duplexes in single-family residential zones as shown in Table 6 in Appendix 1. It would not be unreasonable to expect that over the 20-year planning horizon (2016 – 2036) that an additional 67 ADUs/duplex units would be created. This was calculated by taking a historic average of 3.3 units per year ($50 \div 15 \text{ years} = 3.33$) and multiplying it by the new 20-year planning horizon ($3.33 \times 20 = 66.7$).

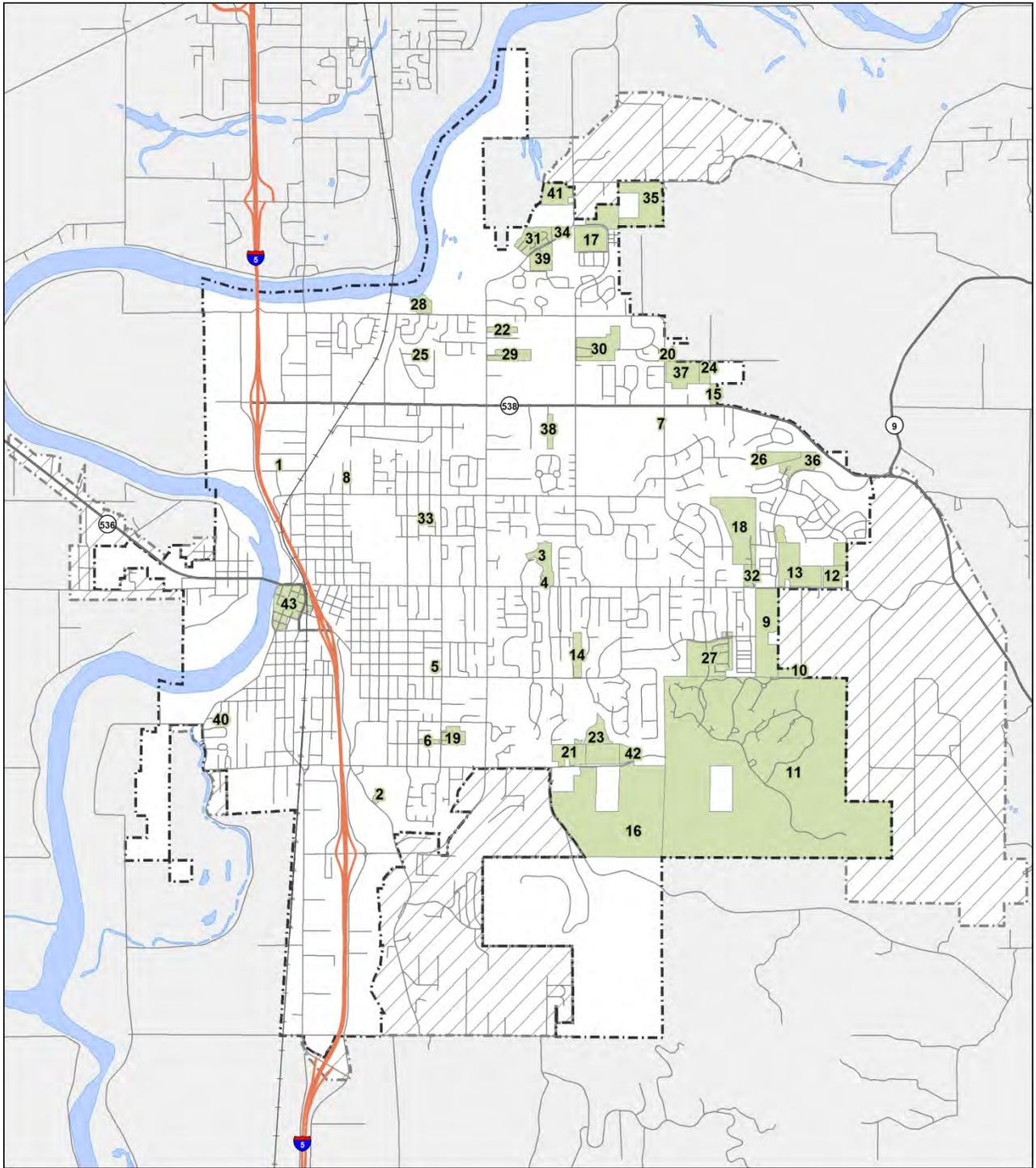


RESIDENTIAL UNITS IN MIXED USE DEVELOPMENT. In the Community Commercial (C-3) and Neighborhood Commercial (C-4) districts multi-family residential units can be constructed with the approval of a conditional use permit. These multi-family units are required to comply with the zoning requirements found in the multi-family residential zone (R-3). After evaluating the placement of existing structure(s), the parcel geometry, and location of on-site critical areas and their associated buffers it was determined that there is 5.55 net acres of property zoned C-3 and C-4 in the City. Consistent with the zoning, it was assumed that this acreage would be developed with both commercial and multi-family uses. This resulted in 69 multi-family units.

PLANNED UNIT DEVELOPMENTS. Planned Unit Developments (PUDs) are zoning overlays allowed within the City. PUDs allow for a twenty percent (20%) increase in the density of a subdivision and they allow a mix of different housing types not allowed without a PUD zoning overlay. The additional residential density that will be realized as property is developed with the City’s PUD code was not counted as part of this analysis.

EXISTING ‘PIPELINE’ DEVELOPMENTS. For developments that have approved Master Plans; such as the Eaglemont and Skagit Highlands P.U.D.s, or developments that have received preliminary or final plat approval; or developments that have received technically complete status and enough is known to ascertain their final lot count, the future development potential was determined by evaluating the number of lots shown within their Master Plans, preliminary or final plat maps, or the mapping that the City has on file.

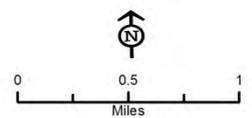
Map 3.0 identifies the location of the existing ‘pipeline’ developments.



MAP 3.0 - EXISTING PIPELINE DEVELOPMENTS



City Boundary
 Current Development Project Site
 UGA Boundary
 (ID) Corresponds to Appendix 1 Table 7



Map by MV GIS 3/31/2016

This was felt to be a more accurate accounting of the number of lots on these sites due to the approvals that had already been secured; and because more detailed, site specific information was available. Some of these developments already have homes constructed on some of the lots that were created with their particular development. In these cases, the number of lots with homes already built on them were subtracted from the original lot count. A list of these developments and their lot counts is provided in Table 7 in Appendix 1.

TRANSFER OF DEVELOPMENT RIGHTS (TDRS). The City has a Transfer of Development Rights (TDR) program that started with a total of 186 development rights. The TDRs can be used in the City’s Single-Family Residential Zones that allow for maximum densities of 4.54 and 3.23 dwelling units per acre (R-1, 4.0 and R-1, 3.0, respectively) and the Duplex and Townhouse zone (R-2).

If a developer chooses to use TDRs within their development they are able to increase the net density on their site by one dwelling unit per net acre.

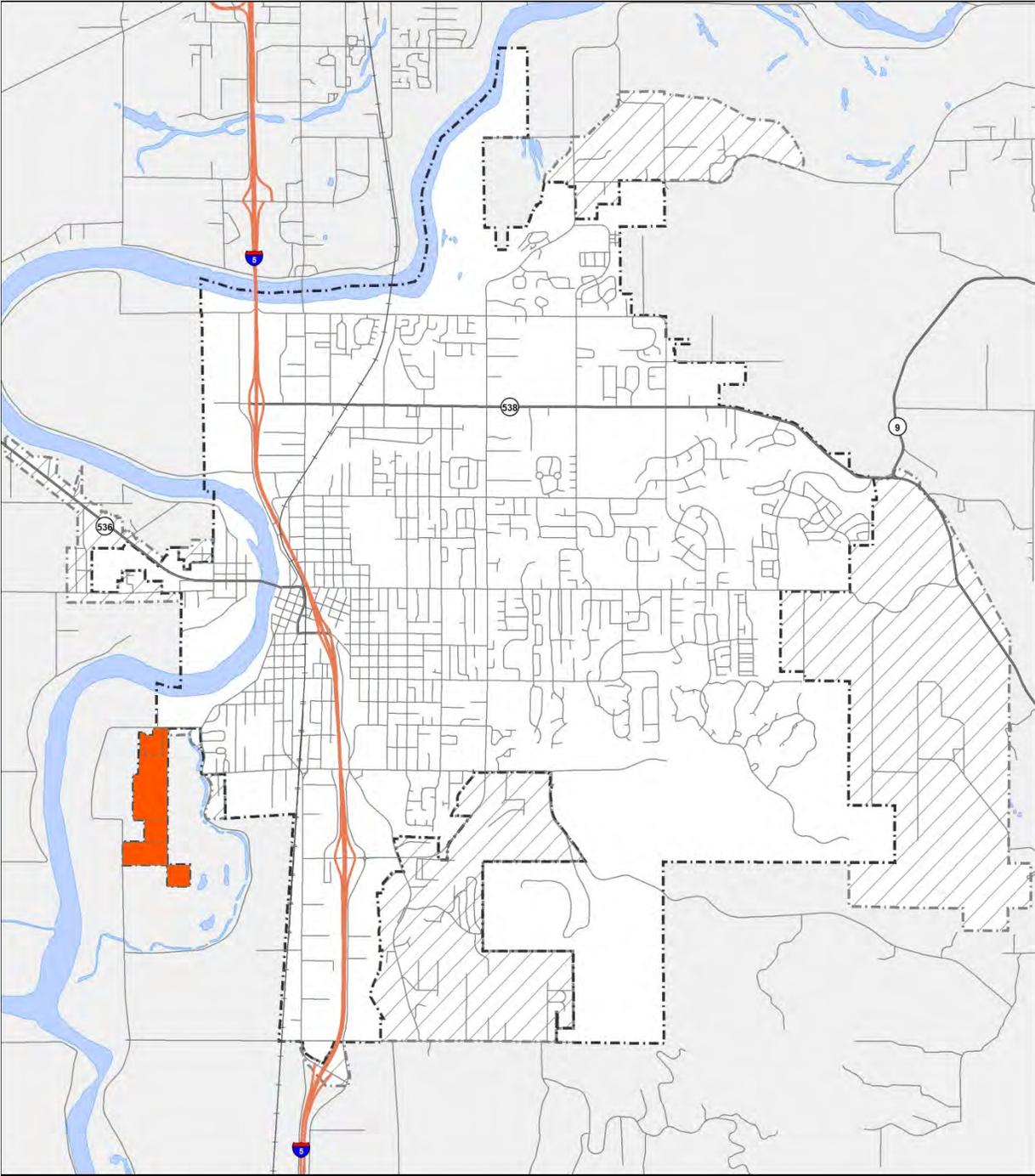
The City has five (5) developments that have either received preliminary plat approval; or have been deemed technically complete that contemplate the use of TDRs. These developments include Iris Meadows (LU06-090) that will use 11 TDRs; Digby Heights (LU07-019) that used 18 TDRs; Trumpeter Place (LU07-023) that used 14 TDRs; and Cedar Heights II (LU07-009) that will use 8 TDRs. This is a total of 79 TDRs that are currently anticipated to be used in the next several years. That leaves 135 TDRs that can be used in the future by new developments.

The sending site where the TDRs originated is a roughly 93 acre site accessed by Dike Road located at the southwest part of the City. This site was not considered as an area where any new development would be located in accordance with the TDR policy. Map 4.0 identifies the location and extent of the City’s TDR sending site.

DOWNTOWN WATERFRONT MASTER PLAN. The City adopted a Downtown and Waterfront Master Plan in 2008. The Master Plan anticipates and plans for 450 multi-family dwelling units being located within the downtown area.

As such, these units have been added to this analysis. Please note that the zoning of the downtown area is C-1; which does allow multi-family units without a specified density restriction except that fire and building codes must be followed.

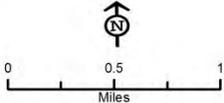




Map 4.0 - Transfer of Development Rights (TDR) Sending Site



- City Boundary
- UGA Boundary
- TDR Sending Site



Map by MV GIS 3/31/2016

MARKET FACTOR. The State has publications entitled “Providing Adequate Urban Area Land Supply” (1992) and the “Buildable Lands Program Guidelines” (2000) that both recommend that methodologies that are used “assume that a certain percentage of vacant, under-utilized, and partially-used lands will always be held out from development”. This assumption about how much land that is held out from development is commonly called a ‘market factor reduction’, or ‘market factor’.

This market factor reduction is intended to address the fact that not all land that could be developed within the planning horizon will be due to landowners not wanting to develop their property because they may be keeping it as an investment, for future expansion, or personal use. Additionally, some landowners may not be interested in developing or subdividing their lots due to factors such as lack of market appeal for the site, or simply lack of interest in the development opportunity.

The Western Washington Growth Management Hearing Board (Board) in *Panesko v. Lewis County*, articulated the purpose of a market factor [with regard to the sizing of UGAs] by explaining:

“A market factor represents the estimated percentage of net developable acres contained within a UGA that, due to fluctuating market forces, is likely to remain undeveloped over the course of the 20-year planning period. The market factor recognizes that not all developable land will be put to its maximum use because of such things as owner preference, cost, stability, quality, and location and, therefore, the GMA permits jurisdictions to include within a UGA not only the area necessary to accommodate projected growth but allows as a – safety factor – the market factor – expressed as a percentage related to total acreage”.

This interpretation of the Board is supported in the Supreme Court’s holding in *Thurston County* (Docket 80115-1, at 31) when the Court stated:

“A market factor represents the estimated percentage of net developable acres contained within a UGA that, due to idiosyncratic market forces, is likely to remain undeveloped over the course of the twenty-year planning cycle”.

Even though the Board and Supreme Court discussions, above, are with regard to the sizing of a UGA, they are important in the context of this discussion because when the City is evaluating its land capacity it is important to take into account a reasonable and defensible market factor. Historically, the Board assumed that a market factor less than twenty-five percent (25%) was acceptable. However, more recently, the Supreme Court has stated, “that the reasonableness of a market factor depends on local circumstances and may therefore vary from jurisdiction to jurisdiction” (*Thurston County*, Docket 80115-1, at 32).

Table 1.3 contains a list of the market factors that different jurisdictions have used. This information was a useful benchmark in determining what Mount Vernon market factor should be.

When evaluating Mount Vernon, the most compelling reason for a mid-to higher market factor, would be the rural setting of Mount Vernon (this is within the context of Skagit County) where some residents enjoy larger lot sizes. This is evidenced within a handful of plats created since the 1960’s where lot sizes average over half and acre in size, like Thunderbird, Forest Estates, and Parkwood Estates. Within these plats the City has received very few inquiries about whether or not these lots could be re-developed (i.e., subdivided) even though this possibility exists.

With Mount Vernon’s setting, the information about what other Washington State municipalities had used, and the information from the above-referenced State publications, Board and Court decisions in mind, it was decided that a market factor of twenty percent (20%) would be used for all residentially zoned lands.

TABLE 1.3: MARKET FACTORS FROM OTHER JURISDICTIONS

JURISDICTION:	MARKET FACTOR REDUCTION USED IN THEIR BUILDABLE LANDS ANALYSIS REPORTS FOR RESIDENTIAL LANDS
Clark County	<ul style="list-style-type: none"> • 10%
King County	<ul style="list-style-type: none"> • Overall between 5% to 20% with re-developable land discounted more than vacant • Central jurisdictions were between 5% to 10% • Established suburban jurisdictions were between 10% to 15% • Outlying jurisdictions were between 15% to 20%
Kitsap County	<ul style="list-style-type: none"> • Vacant lands 5% • Underutilized lands 15%
Pierce County	<ul style="list-style-type: none"> • For vacant lands most factors were between 5% and 25% • For underdeveloped lands most factors where between 10% and 30% • For re-developable lands most factors were between 20% and 50% <p>(These factors varied by jurisdiction within this County)</p>
Snohomish County	<ul style="list-style-type: none"> • For vacant lands 15% • For partially-use or re-developable 30%
Thurston County	<ul style="list-style-type: none"> • An average market factor countywide of 24% <p>(These factors varied by jurisdiction within this County)</p>
City of Bellingham	<ul style="list-style-type: none"> • For vacant land 15% • For partially developed land 25%
City of Edmonds	<ul style="list-style-type: none"> • For vacant land 15% • For partially used and re-developable land 30%

3.4: RESIDENTIAL SUMMARY

Table 1.4 below summarizes the number of additional housing units that could be located in the City taking into account the buildable lands methodology described above. Map 5.0 illustrates the residentially designated parcels where additional development is possible.

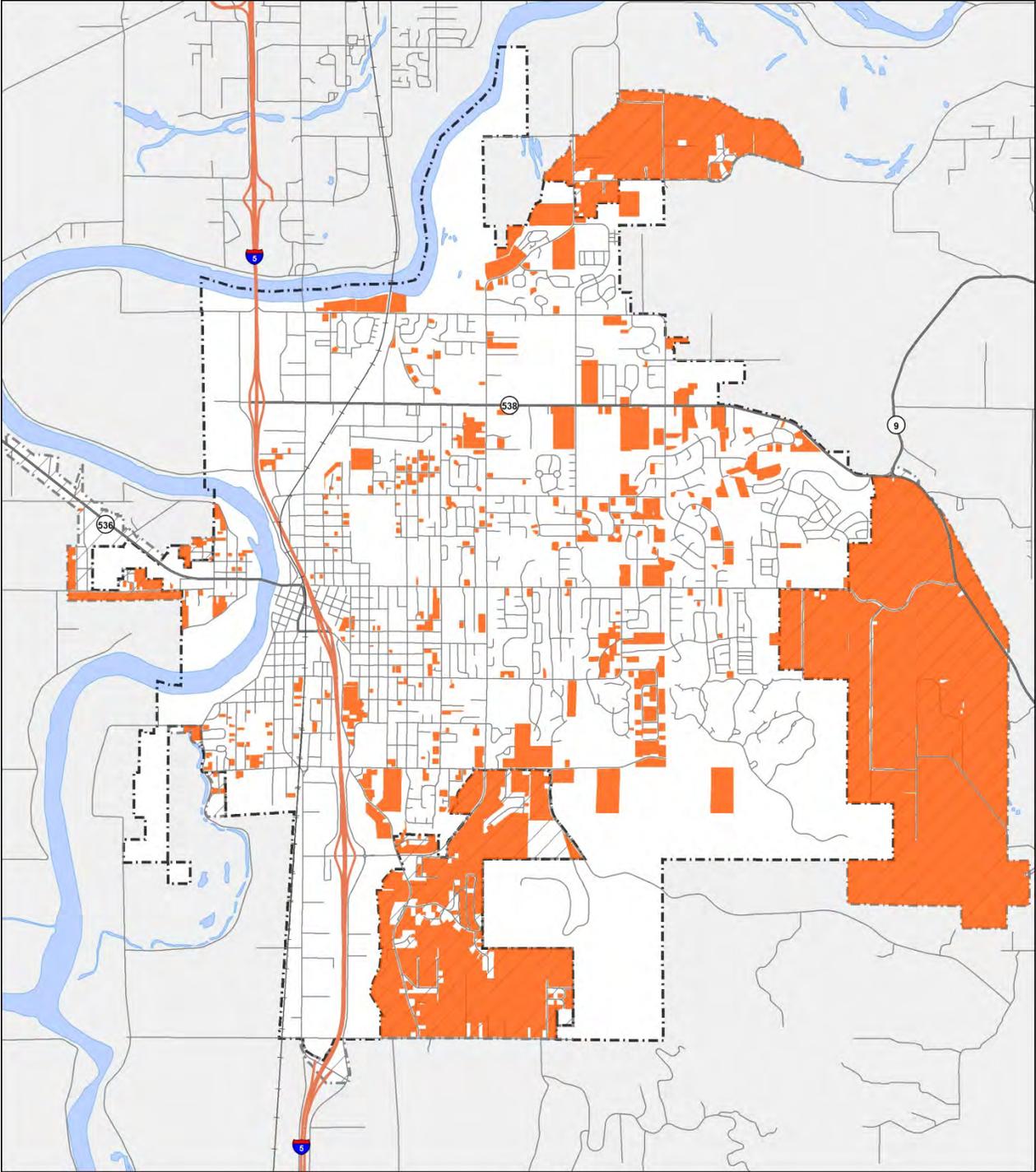
TABLE 1.4: RESIDENTIAL UNIT SUMMARY

	IN CITY ²	UGA ²	TOTAL NEW UNITS CITY + UGAS BEFORE MARKET FACTOR REDUCTION	20% MARKET FACTOR REDUCTION	TOTAL NEW DWELLING UNITS CITY + UGAS
Single-Family ¹ Residential	1,282	5,355	6,637	< 1,328 >	5,309
Multi-Family Residential ³	345	0	345	< 69 >	276
Existing Pipeline Developments ⁴	1,888	0	1,888	NA	1,888
Downtown Master Plan Units	450	NA	450	NA	450
Mixed Use Units ⁵	69	NA	69	< 14 >	55
Transfer of Development Rights	135	0	135	NA	135
ADUS/Duplexes	67	0	67	< 13 >	54
TOTALS:	4,236	5,355	9,591	< 1,424 >	8,167

¹ Includes all existing or future R-1 zones. Existing R-A zoned properties have been assigned to a zoning category consistent with their existing Comprehensive Plan designations.
² See Appendix B for the methodology utilized in determining the number of additional lots that could be created.
³ Includes all R-2, R-3, R-4 zones.
⁴ See Appendix B for a list of the existing pipeline developments and their associated lot counts.
⁵ Units allowed with mixed-used developments in the C-3 and C-4 zones

Mount Vernon’s growth target in 2036 is 46,811 people – an increase of 11,842 people between 2016 and 2036. This new population is converted to 4,290 dwelling units by dividing the population by the average household size of 2.76 people.

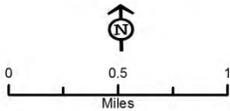
In the City limits with the 20% market factor applied 3,883 new residential units could be created. This means that nearly 90% of the City’s projected 20-year growth could be accommodated within the existing City limits (3,883 ÷ 4,290 = 90.5%).



Map 5.0 - Residential Lots That Could be Further Developed



- City Boundary
- UGA Boundary
- Residential Zoned Parcels With Development Potential



Map by MV GIS 3/31/2016

4.0

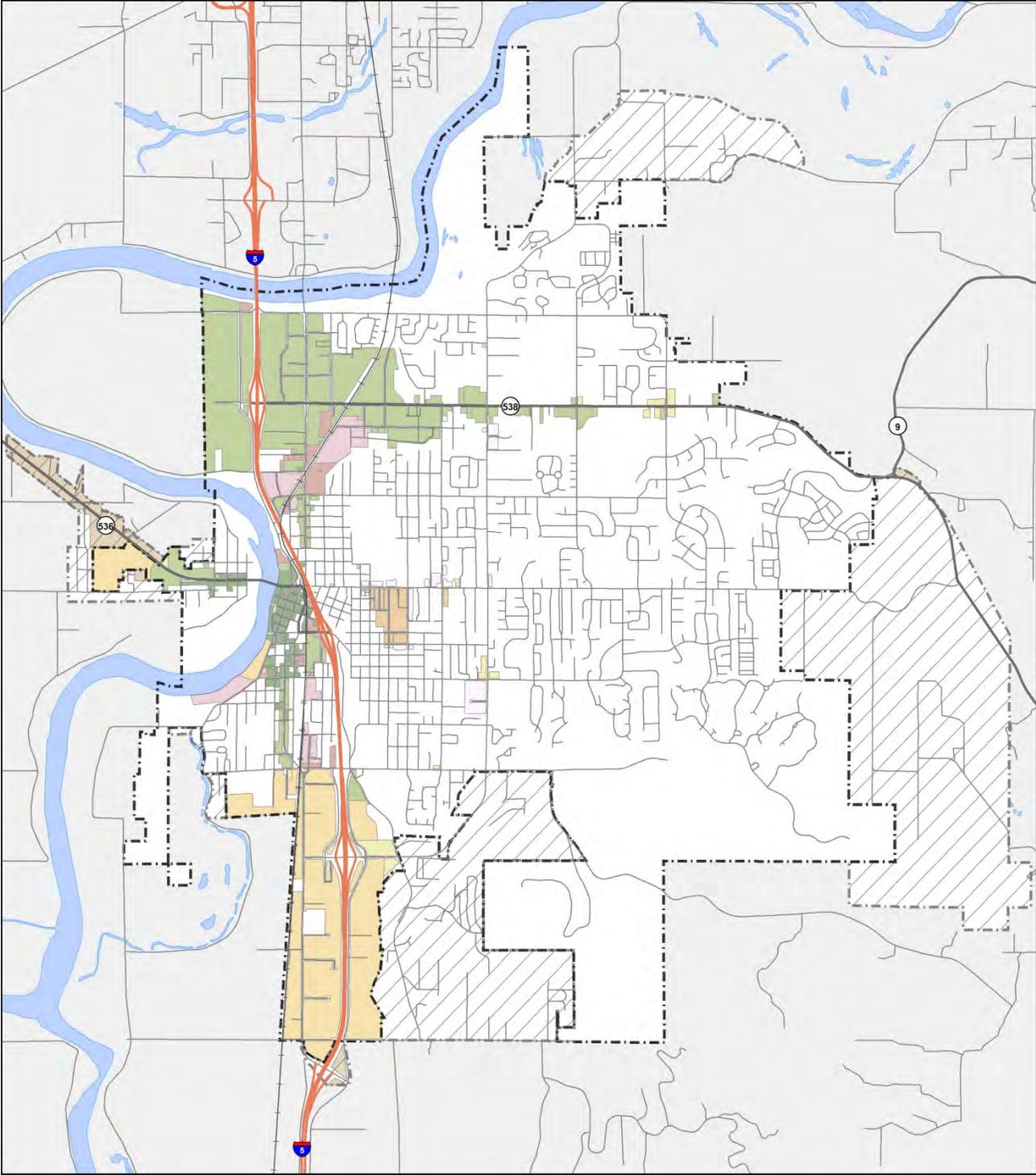
COMMERCIAL/INDUSTRIAL ZONES

The City has ten (10) commercial and industrial zoning districts that provide for a variety of building intensities and uses. These zones include the Health Care Development District (H-D), the Professional Office District (P-O), the Central Business District (C-1) which is mainly the historic downtown area surrounding 1st Street and areas on the west side of the Division Street bridge, the General Commercial District (C-2) which is the zoning found predominately along College Way and Riverside Drive, the Community and Neighborhood Commercial Districts (C-3 and C-4 respectively), the Commercial-Limited Industrial District (C-L) which South Mount Vernon is mostly comprised of, the Light Manufacturing and Commercial District (M-1), and lastly the Industrial District (M-2). Map 6.0 shows the location of these commercial/industrial parcels.

To begin the analysis of the commercial/industrial zones the following bulleted list of data was collected. All of this data was and analyzed using Geographic Information System (GIS) software.

- Skagit County Assessor's tax parcels;
- Aerial photography produced in the Spring of 2013 and 2015;
- Zoning and Comprehensive Plan designations;
- Physical improvements on the site (building(s), parking lot(s), etc);
- Parcel size; and,
- Approximate square footage of critical areas including wetlands, streams, floodways or areas of geologic hazard, and their associated buffers. Please see the section labeled: *Critical Areas and their Buffers*, for additional information on how these areas were identified and quantified.

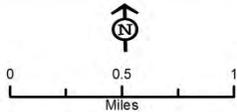
Following the collection of the above-listed data twenty percent (20%) of the gross site area was subtracted out to account for access ways and stormwater facilities. The remaining square footage was then tabulated.



Map 6.0 - Commercial / Industrial Parcels



- City Boundary
- UGA Boundary
- Commercial Industrial Zone in UGA
- Zoning Designations**
 - C-1
 - C-2
 - C-3
 - C-4
 - C-L
 - H-D
 - L-C
 - M-1
 - M-2
 - P-O



Map by MV GIS 3/31/2016

The twenty percent (20%) that is taken out of the square footage for access ways and stormwater facilities was determined by evaluating 11 commercial/industrial developments within the City that were built or planned between 1997 and 2009. Table 3 in Appendix 1 contains a list of these developments and the area that was used for their particular access way and stormwater facilities. What was found is that an average of seven percent (7%) of these sites was encumbered with public or private roads or driveways; and that an average of eight percent (8%) of these sites was occupied with stormwater facilities. This means that an average of fifteen percent (15%) of these developments was comprised of access ways and stormwater facilities. As with the residentially zoned lands; the percentage of future sites that would be taken up with larger stormwater facilities that will be constructed due to the new stormwater regulations that the City adopted in 2009. As such, the future coverage for access ways and stormwater facilities was increased from fifteen percent (15%) to twenty percent (20%).

The placement of existing structure(s), the parcel geometry, and location of on-site critical areas and their associated buffers was also evaluated to make sure that these factors did not prevent additional development on these parcels. This was done because there were parcels where even though there appeared to be enough square footage for either an expansion of an existing building or for a new building to be constructed, these factors would prohibit it.

Section 3.2 discussed the additional multi-family units that will be created as part of the City's Downtown & Waterfront Master Plan; however, additional commercial property will also be created in this area. A total of 3.2 new acres of commercial property (zoned C-1) will be created as part of this plan. This additional C-1 acreage has been added as part of this analysis.

For illustrative purposes, on the following page is a simplified flow chart that identifies the steps that were completed to determine the amount of potential additional developable commercial/industrial property.

4.1 MARKET FACTOR/LAND IN HOLDING

The market factor discussion found above in sub-section 3.3 also applies to commercial and industrial lands just like it does for residentially zoned property. For this analysis a fifteen percent (15%) market factor reduction for commercial/industrial zoned lands was applied, which is less than the 20% market factor applied to residentially zoned lands.

This market factor was chosen to match the market factor that E.D. Hovee and Associates used within their September 2006 report entitled, “City of Mount Vernon Commercial & Industrial Land Needs Analysis”. The justification for this market factor is fully outlined within this report that accompanies the Land Use Element of the Comprehensive Plan labeled as Appendix C.

4.2: COMMERCIAL/INDUSTRIAL SUMMARY

Table 1.5 below summarizes the acres of additional commercial and industrial land available for development in the City of the 20-year planning horizon using the above-outlined buildable lands methodology.

Map 7.0 shows the location of the parcels where additional commercial/industrial development is possible.

TABLE 1.5: COMMERCIAL/INDUSTRIAL SUMMARY

	2,000 to 10,000 s.f.	> 10,000 s.f. to 1-acre	> 1-acre to 5-acres	> 5-acres
Commercial ¹	5.5 acres	23.1 acres	14.6 acres	25.3 acres
Industrial ²	5.9 acres	27.9 acres	65.9 acres	6.7 acres
Healthcare District	.42 acres	.82 acres	NA	NA
Downtown Waterfront	NA	NA	3.2 acres	NA
UGA Commercial/Industrial	1.2 acres	6.3 acres	9.9 acres	0
TOTALS:	13 acres	58 acres	93.6 acres	32 acres

¹ Includes C-1, C-2, C-3, C-4, LC, P-O, and R-O zones.

² Includes C-L, M-1 and M-2.

Verifying whether or not the City has enough land for commercial and industrial uses over the 20-year planning horizon is much more difficult to do than the residential determination is. Part of the reason this is more difficult is because the different commercial and industrial land uses that are allowed in these zones produce vastly different numbers of jobs. For example, in Mount Vernon, on average, a new mini storage facility provides .60 jobs per acre whereas a professional office creates approximately 16 jobs per acre. With jobs data from the Employment Security Department (ESD) the City was able to calculate jobs per acre ratios for different types of commercial/industrial land uses within the City. A representative sample of these ratios is contained in Table 1.6 below.

TABLE 1.6: JOBS PER ACRE SUMMARY

LAND USE	DESCRIPTION	JOBS PER ACRE
Retail	Auto oriented retail uses located on sites 1 to 2 acres in size	13
Hotels	Auto oriented hotels with at least 50 rooms	13
Vehicle Sales	Vehicle sales lots on sites .50 to 4 acres in size	15
Mini Storage	Mini storage facilities on at least 4 acres	.60
Offices	Office uses on .50 to 2 acre sites	16
Services	Auto oriented services on sites .4 to 1 acre in size	13

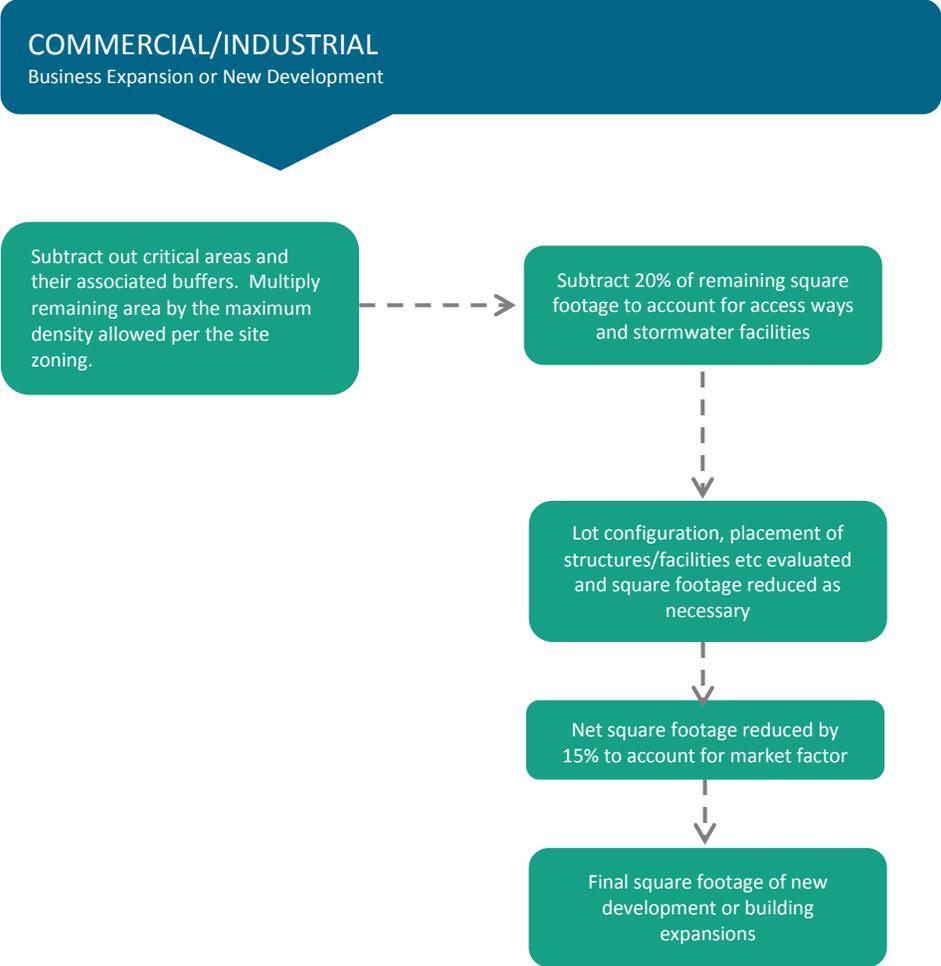
Another factor making the determination regarding whether or not the City has enough commercial and industrial land more difficult is the fact that empty and under-utilized commercial/industrial buildings are not part of this specific analysis.

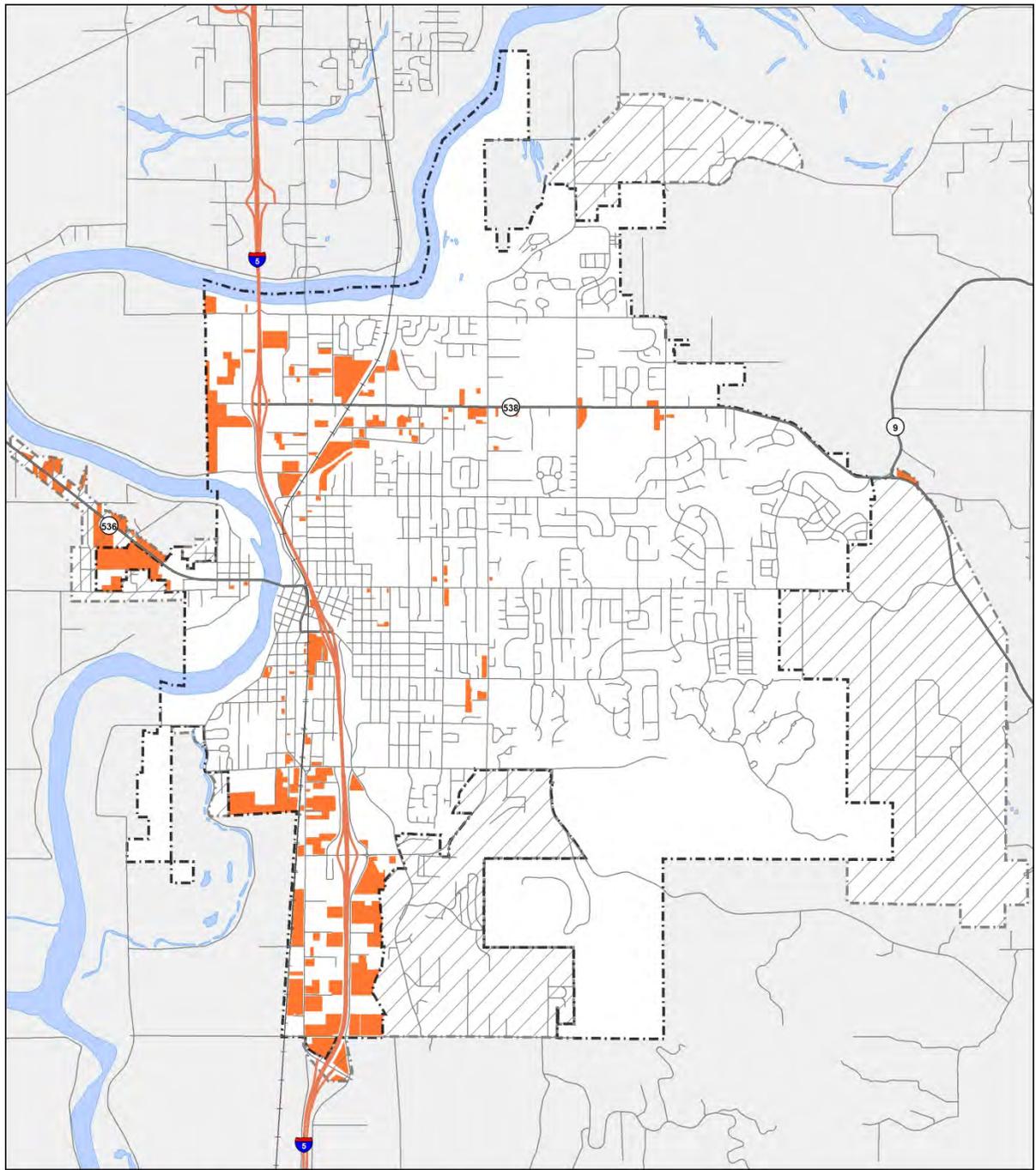
The City’s employment target for the 2016 to 2036 planning horizon is 4,558 new jobs. If all of these new jobs were allocated to the 197-acres of vacant commercial/industrial land summarized in Table 4.2, in its entirety this acreage would need to produce, on average, 23 jobs per acre ($4,558 \div 197 = 23$) to produce the City’s allocation of jobs over the next 20-years. Theoretically it is possible that this acreage could produce this number of jobs; however, given existing and historical trends it is unlikely.

This means that the City needs to make sure that the commercial and industrial lands in the City are primarily used for job producing uses. Policies that prohibit the conversion of commercial/industrial properties to other uses, especially for housing, must continue to be enforced in the City. The City must also continue to look for creative ways to encourage higher density job producing business to locate in the City and to foster job producing uses in other zoning districts.

Attached as Appendix C to the Land Use Element of the City’s Comprehensive Plan is a report completed by E.D. Hovee and Associates in 2006. This report contains additional background information and analysis with regard to the City’s need for additional commercial and industrial land. This report also provides details with regard to where businesses will desire to be located (near Interstate-5) and the need for an inventory of larger commercial/industrial properties to attract higher job producing businesses.

The figure below provides an overview of how the City’s commercial/industrial lands were treated through this analysis.

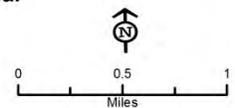




Map 7.0 - Commercial / Industrial Parcels With Development Potential



- City Boundary
- UGA Boundary
- Commercial / Industrial Parcels With Development Potential



Map by MV GIS 3/31/2016

5.0

PUBLIC USES

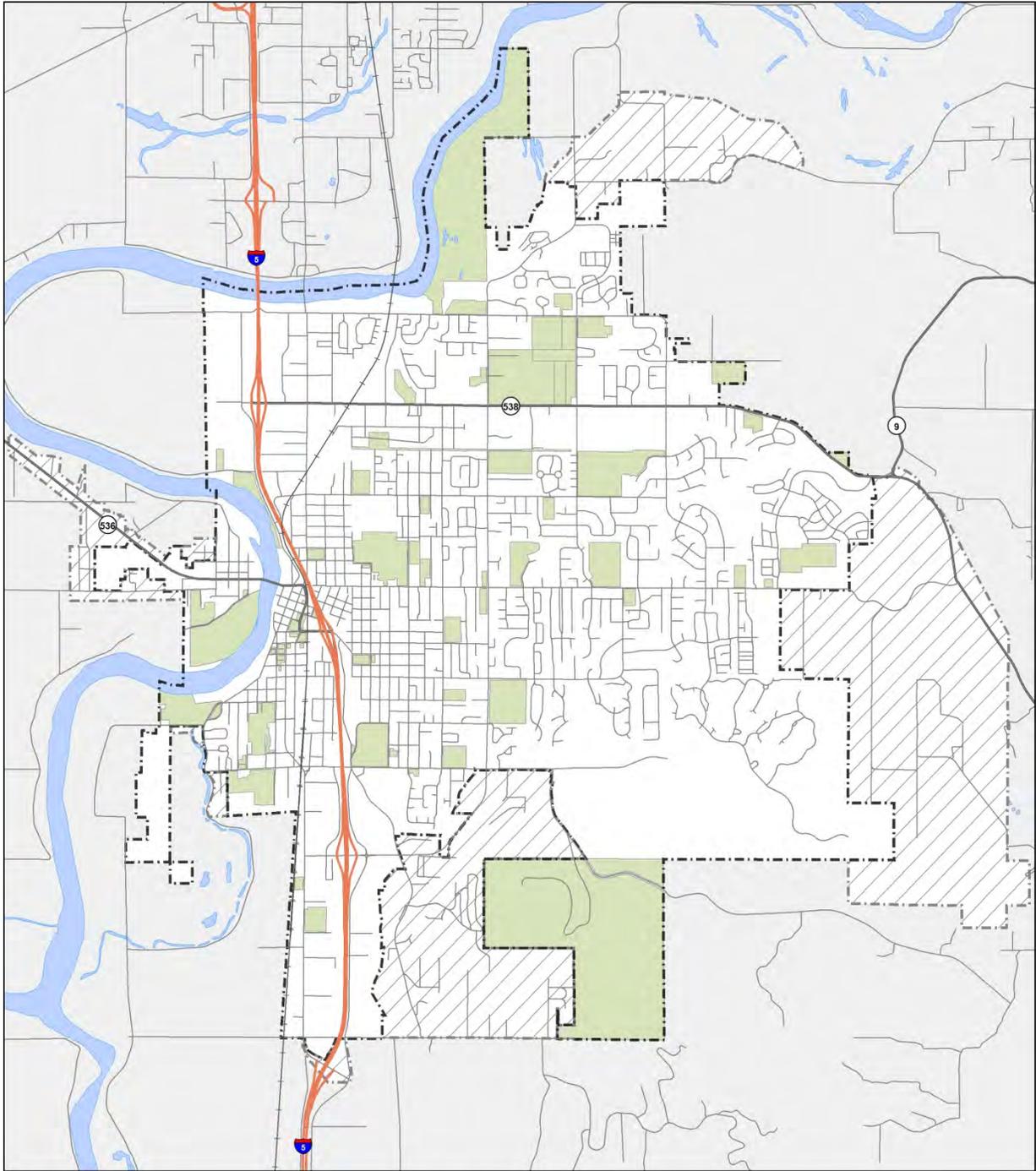
In addition to the residential and commercial/industrial uses already discussed, the City also needs to quantify the amount of land currently occupied with public uses. In the City public uses generally have a zoning designation of Public (P) and associated Comprehensive Plan designations of: Government Center (G), Churches, Community College, Schools (CH, CC, S), Community Park, Neighborhood Park (CP) and Open Space/Cemetery (OS). Map 8.0 shows the location of these public zones.



As with the other zoning designations discussed earlier within this report, a current Skagit County Assessor’s parcel map, aerial photography that was taken for the City in the Spring of 2013 and 2015, and the City’s critical area maps (discussed in detail in the ‘Critical Areas and Buffers’ section that follows) data was collected and stored in the City’s Geographic Information System (GIS) and was analyzed using GIS software. This mapping data was supplemented with other Skagit County Assessor’s data when necessary.

For each public zoned parcel (again, this is the G, CH, CC, S, CP, OS, and P districts) the following data was also collected and tabulated:

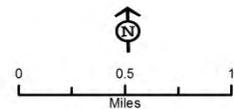
- Zoning and Comprehensive Plan designations; and,
- Parcel size.



Map 8.0 - Public Zones



- City Boundary
- Public Zoned Parcel
- UGA Boundary



Map by MV GIS 3/31/2016

The publicly zoned areas were inventoried and tabulated; but not analyzed as areas for future development because a majority of the parcels analyzed showed that most of the site is currently utilized, or Master Plans have been completed showing that future development is envisioned; and, in the case of parks, the open space areas are just that, open space, where development will likely not occur. Cemeteries were also not considered as developable areas as it is likely that unused land within existing cemeteries will be used for future burial sites.

Following is additional information on parks, schools, municipal facilities, and other public uses that exist in the City.

PARKS, OPEN SPACE AND GREENBELTS. The Growth Management Act (GMA) requires, in part, that the City accommodate the growth allocated to the City and that the areas where this growth is planned must also include greenbelt and open space areas [RCW 36.70A.110(2)]. The City has adopted a Parks, Recreation, and Open Space Element in our Comprehensive Plan (Chapter 4); however, this analysis did quantify the approximate locations and amounts of additional open space and greenbelt areas that will likely be preserved as undeveloped parcels are developed



Before future open space and greenbelt areas are discussed, it is important to point out that the City has an abundance of existing recreational opportunities and open spaces throughout the City. Currently the City is able to boast 860 acres of parks (developed and undeveloped), 1,061 acres of resource conservancy areas, five (5) waterfront access sites, over five (5) miles of multi-purpose trails, 23 playgrounds, and two (2) swimming pool facilities.

Greenbelt and open spaces areas will be preserved throughout the City where new development occurs due (in part) to the amount of wetlands, streams, steep slopes, and floodways (plus the buffers that are associated with some of these critical areas) that are located throughout the City. The following section entitled “Critical Areas and their Buffers” fully explains how the location and amount of each of these critical areas was determined.

Additional greenbelt and open space areas will also be created with future developments as the City’s landscaping code mandates that between seven (7) to 20 percent (7% - 20%) of the gross site area of all new developments be comprised of landscaped areas. The range in the amount of landscaping that is required depends on the zoning of a parcel, where commercial/industrial parcel require less landscaping; and residentially zoned parcel require more landscaping.

SCHOOLS. Educational facilities in the City are provided by both public and private schools. The public kindergarten through High School education is provided by Mount Vernon School District #320 (District). The district currently has six (6) elementary school sites (kindergarten through eighth grade), two (2) middle school sites (seventh and eighth graders) and one (1) high school site. The district also has four (4) additional facilities that provide operation support functions to the schools in the form of a central office, a special services office, a transportation facility and a maintenance facility.



There are two primary private schools in Mount Vernon including Mount Vernon Christian School and Immaculate Conception Regional School. Mount Vernon Christian School provides a kindergarten through high school education. Immaculate Conception Regional School provides kindergarten through eighth grade education.

The Mount Vernon School District works closely with the City of Mount Vernon in monitoring growth within the City. The District has prepared a Capital Facilities Plan (CFP) that the City has adopted as part of its Comprehensive Plan. Even though the District’s CFP is a six (6) year plan it does include projected enrollment out to 2024. The District’s enrollment and capacity data identify that two (2) new elementary school will be necessary over the planning horizon. The school district has already purchased two (2) ten acre sites (one on the south side of Swan Road and one on the north side of Division Street) that will someday become elementary schools. For the purposes of this analysis these two (2) sites were not considered for any other type of development except for schools.

Post-secondary education is provided in the City at Skagit Valley College where students can earn numerous different technical or professional certificates or an Associates Degree (2-year degree). The college completed a Master Plan in 2001 that was adopted by the City. This plan shows that the college will be able to accommodate future students within the boundaries of their current campus out to the year 2021 with new buildings and expansions within the campus. However, since the adoption of the College’s 2001 Master Plan they purchased an additional neighboring 7.34 acre property in 2007 (located to the east of their existing campus abutting East College Way).

MUNICIPAL FACILITIES. A complete description of the City of Mount Vernon’s Capital Facilities, Public Services and Utilities can be found in Chapter 7 of the City’s adopted Comprehensive Plan. The City’s existing facilities and the properties that they are located on should be able to accommodate the increased staffing and expansions that would be necessary to serve the increased



development through 2036. A major renovation to City Hall was completed in 2002, to the Police and Court Campus in 2009, and additional property was purchased around the existing wastewater treatment plant so that future expansions would be possible.

6.0

CRITICAL AREAS

The City has several mapping resources and tools that identify potential critical areas within the City. For the purposes of this inventory, the critical areas that were evaluated include streams, wetlands, floodways and steep slopes.



In 2007 when the City’s new critical areas ordinance was approved a new, innovative approach to critical area buffers was adopted. This new method allows a property owner to choose between two (2) different approaches in complying with the critical areas ordinance. With the first approach a large buffer is placed around a critical area on a site and the owner doesn’t need to do anything else but make sure that the buffer is left alone. The second approach is what is called the ‘ecosystem alternative’. With the ecosystem alternative a property owner is able to buy down the big buffer, in exchange for enhancing the buffer that remains, and making sure that water quality facilities are installed on the site. The City then takes the money that the property owner pays to buy down their buffer and enhances a City restoration site within the same basin that the project site is located within. For the purposes of this analysis, these City restoration sites have not been counted as areas where any type of future development will be located.

Due to the different resource maps and information that the City has in its possession stream, wetland, floodways and steep slope areas and their associated buffers had to be dealt with a little differently. The following sections explain how each of these critical areas were inventoried and analyzed.

6.1: STREAMS

Starting in 2001 the City commissioned a series of reports to inventory the stream systems in the City. These reports have resulted in a majority of the City’s stream segments being physically walked by biologists from their confluence to their headwaters. With these different reports, done over time, the City has amassed an array of information about the City’s streams including, but not limited to, the following data: potential fish barrier locations and types, stormwater outfall locations and types, water type, sub-basin location, descriptions of whether the system is natural or maintained, gradient, channel width, channel slope, channel composition, and the presence of fish or not.

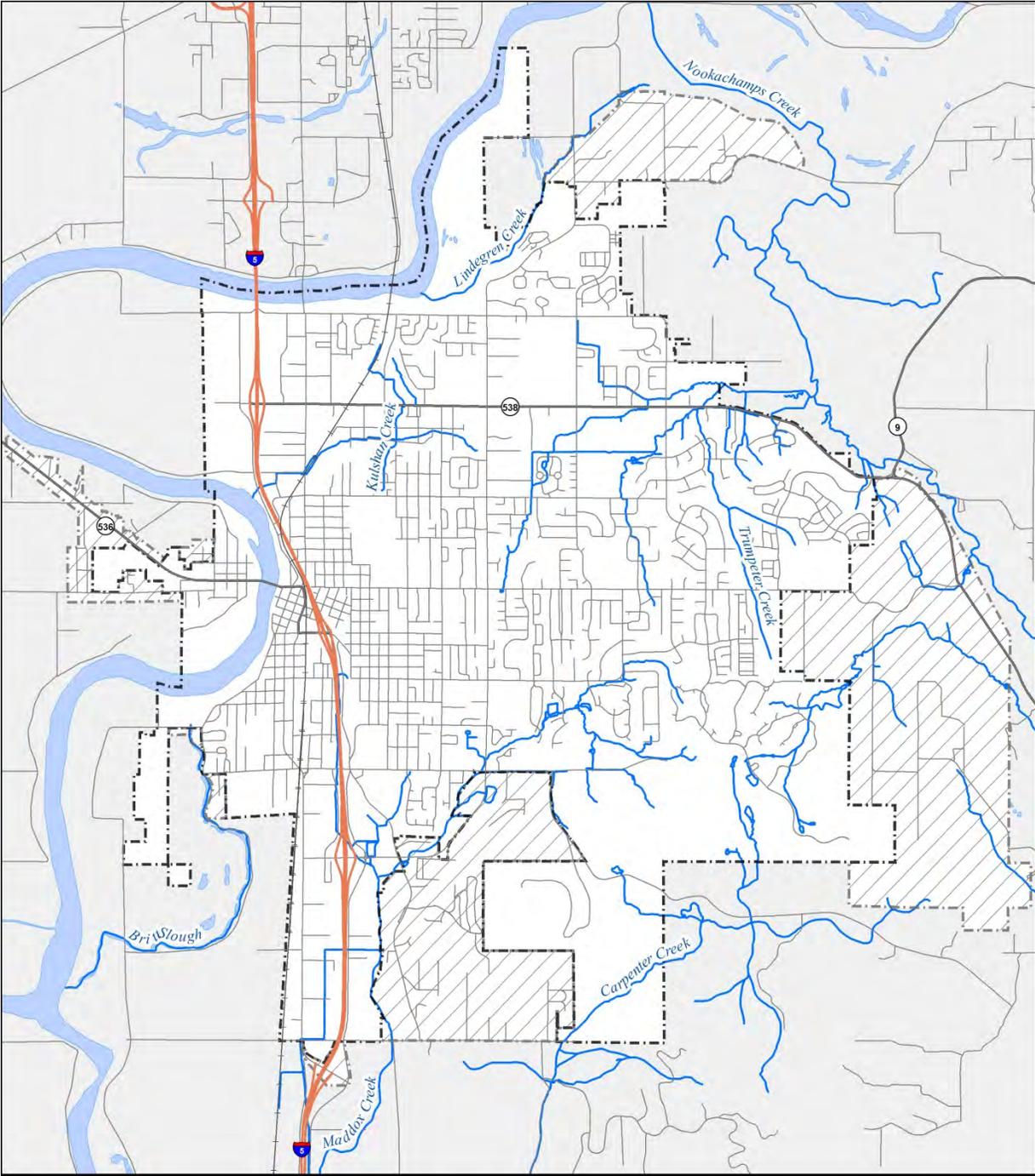


Even though the City has a way to reduce stream buffers on private property (the ecosystem approach) a conservative approach was taken when evaluating the City’s buildable land abutting streams. Along with the width of the stream itself, the following stream buffers were assumed to be unbuildable and netted out of residential and commercial/industrial lands within this analysis.

Map 9.0 shows the location of the City’s regulated streams that have, to-date, been identified.

TABLE 1.7: STREAM BUFFERS USED

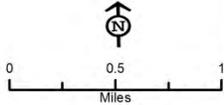
WATER TYPES	ATTRIBUTES	BUFFER WIDTH STANDARD
F	Fish Habitat Waters	150 feet
Np	Year-Round, Non-fish Habitat	50 feet
Ns	Seasonal, Non-fish Habitat	35 feet



Map 9.0 - Streams



City Boundary Streams
UGA Boundary



Map by MV GIS 3/31/2016

To illustrate how conservative this approach is Table 1.8, below, identifies the maximum stream buffer reductions that could be approved by City should an applicant choose to use the City’s ecosystem alternative codified within the Mount Vernon Municipal Code.

TABLE 1.8: ECOSYSTEM ALTERNATIVE STREAM BUFFERS

WATER TYPES	ATTRIBUTES	BUFFER WIDTH ECOSYSTEM
F	Fish Habitat Waters	25 to 50 feet
Np	Year-Round, Non-fish Habitat	25 to 50 feet
Ns	Seasonal, Non-fish Habitat	25 feet

6.2: WETLANDS

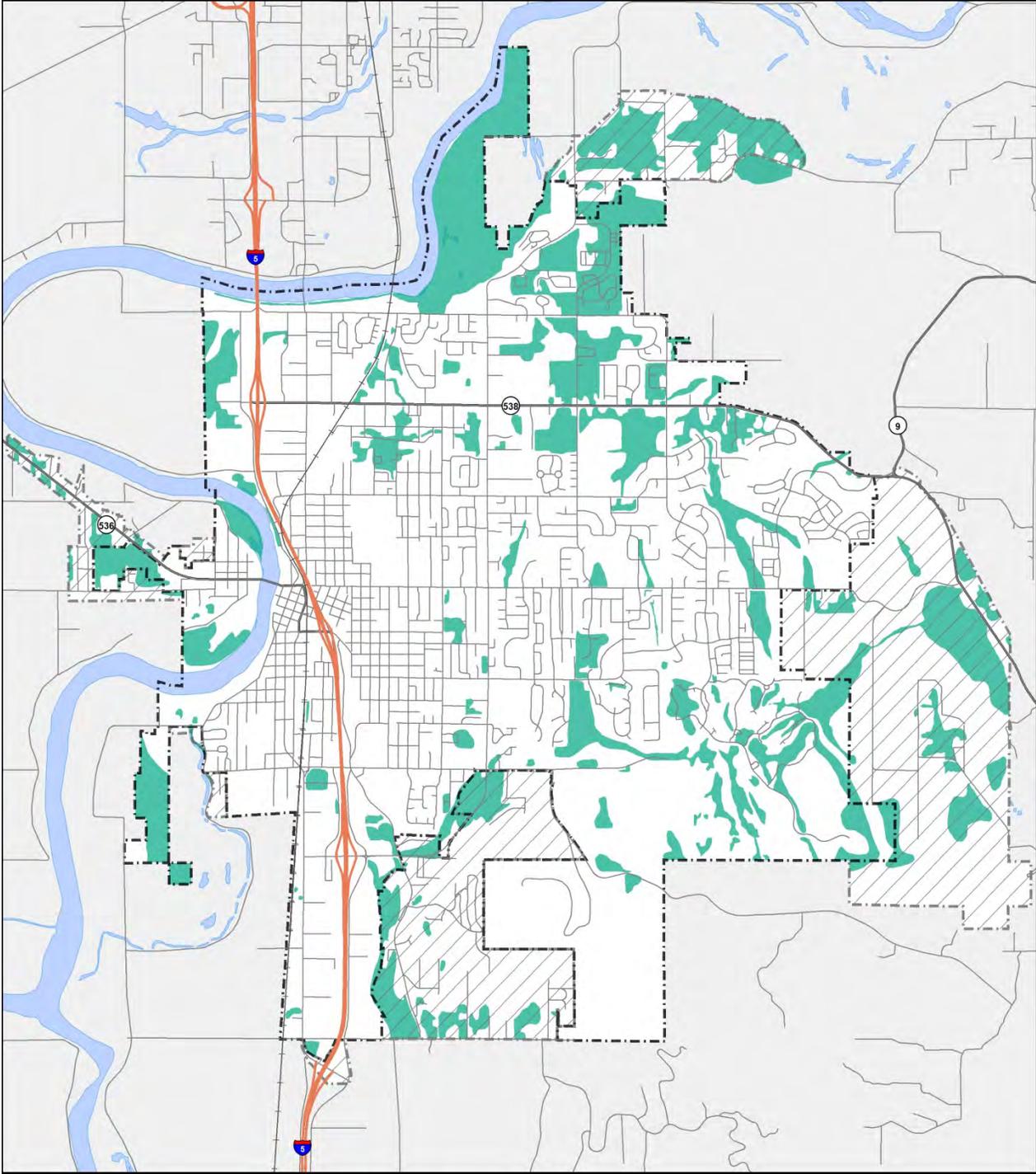
The location and extent of wetlands proved to be the most difficult element to factor into the buildable lands analysis. This information was difficult to use because it is far more general than the stream, floodway or steep slope information is.



The reconnaissance level wetland mapping that the City has is a compilation of soil information from the U.S. Soil Conservation Service, the National Wetland Inventory maps, the Department of Natural Resources mapping, actual delineation reports previously submitted to the City, aerial photography, and windshield surveys by biologists. Map 10.0 shows the location of these potential wetland areas.

Comparing the wetlands shown on the City’s wetland inventory mapping and actual wetland reports and delineations that the City has on file, overwhelmingly demonstrates that the wetland inventory maps identify far more wetland areas on a site than what is actually found when the site is evaluated by a biologist.

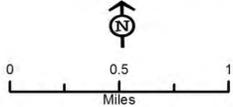
Since the wetland mapping is such a general tool, when a recent wetland analysis was on file with the City, this more accurate information was used with regard to the location and extent of wetlands.



Map 10.0 - Potential Wetland Areas



- City Boundary
- Potential Wetland Area
- UGA Boundary



Map by MV GIS 3/31/2016



Table 5 in Appendix 1 contains a table of 36 plats, P.U.D.s and developments, that cover 478 acres throughout different geographic parts of the City; and compares the percentage of the site shown as wetlands by the City’s wetland mapping and the known percentage of wetlands that have actually been delineated on each site. Of the 36 developments that are listed within Table 5, the average percent of delineated wetlands was found to be 5%; whereas, the City’s mapping indicated that 61% of these same sites could be encumbered with wetlands. Additionally, the 5% of the developments that were found to have delineated wetlands on them is slightly high as five (5) of the wetland areas listed within these developments also include their associated buffers because they (the wetland and its buffer) could not be accurately separated.

Because of the significantly stronger trend of the City’s maps to identify more wetland areas than actually exist, and because a property owner could go through the necessary steps to obtain approvals from the Corps of Engineers and the Department of Ecology to fill portions of wetlands that may exist on their property, it was assumed that if a wetland was shown as potentially existing on a parcel fifty percent (50%) of what was shown was considered undevelopable. This means that the 50% would also account for buffers that would be required according to the City’s development regulations.

If the City’s mapping did not indicate that a wetland could be present, it was assumed that there were not wetlands on that site. But, before incorporating this assumption into this buildable lands methodology aerial photography and existing developments were analyzed to make sure that the City general wetland mapping did not miss any areas of the City where wetlands might exist.



After an exhaustive search for other potential wetland areas within the City, it was determined that this approach was reasoned and supportable. It simply did not make good sense to assume that wetlands might be present where they are clearly not. The areas where the City’s mapping does not indicate potential wetlands are generally areas that have been built out with widespread existing impervious surface areas, such as the City’s historic downtown and the residential areas on the hillsides to the east of Interstate-5.

Similar to the stream buffer regulations described in the section above, the City’s critical area code also contains a ‘big buffer’ and an ‘ecosystem alternative’ approach to wetland buffers. The following tables outline the wetland buffers required with the City’s standard and ecosystem alternative wetland buffers.

TABLE 1.9: WETLAND BUFFERS

WETLAND CATEGORY	STANDARD BUFFER
I	200 ft.
II	100 ft.
III	75 ft.
IV	50 ft.

TABLE 1.10: ECOSYSTEM WETLAND BUFFERS

WETLAND TYPES	BUFFER WIDTH ECOSYSTEM
II	25 to 75
III	25 to 75
IV	25 to 37.5

It is important to mention that the City does have an approved wetland mitigation bank that can be used to mitigate wetland impacts on property within the City. The Nookachamps Mitigation Bank is located on 267± acres (partially in the City and partially in Skagit County).

This means that a developer has four (4) options with regard to how wetland(s) on their property can be treated. A developer could use the City's 'big buffer' program, they could buy the buffer down with the 'ecosystem alternative', they could purchase wetland credits from the Nookachamps Mitigation bank, or they could go through the Federal, State, and local processes to fill all or portions of the wetlands on their site.

Lastly, the portion of this wetland bank that is located within the City limits was not considered as an area where future development would be located.

6.3: FLOODWAYS

Areas located on the water side of the existing levee system in Mount Vernon were considered by this analysis as floodways; even though they are not officially mapped as such by the Federal Emergency Management Agency (FEMA) on the City's Flood Insurance Rate Maps (FIRM). The City's regulated floodways are shown on Map 11.0.

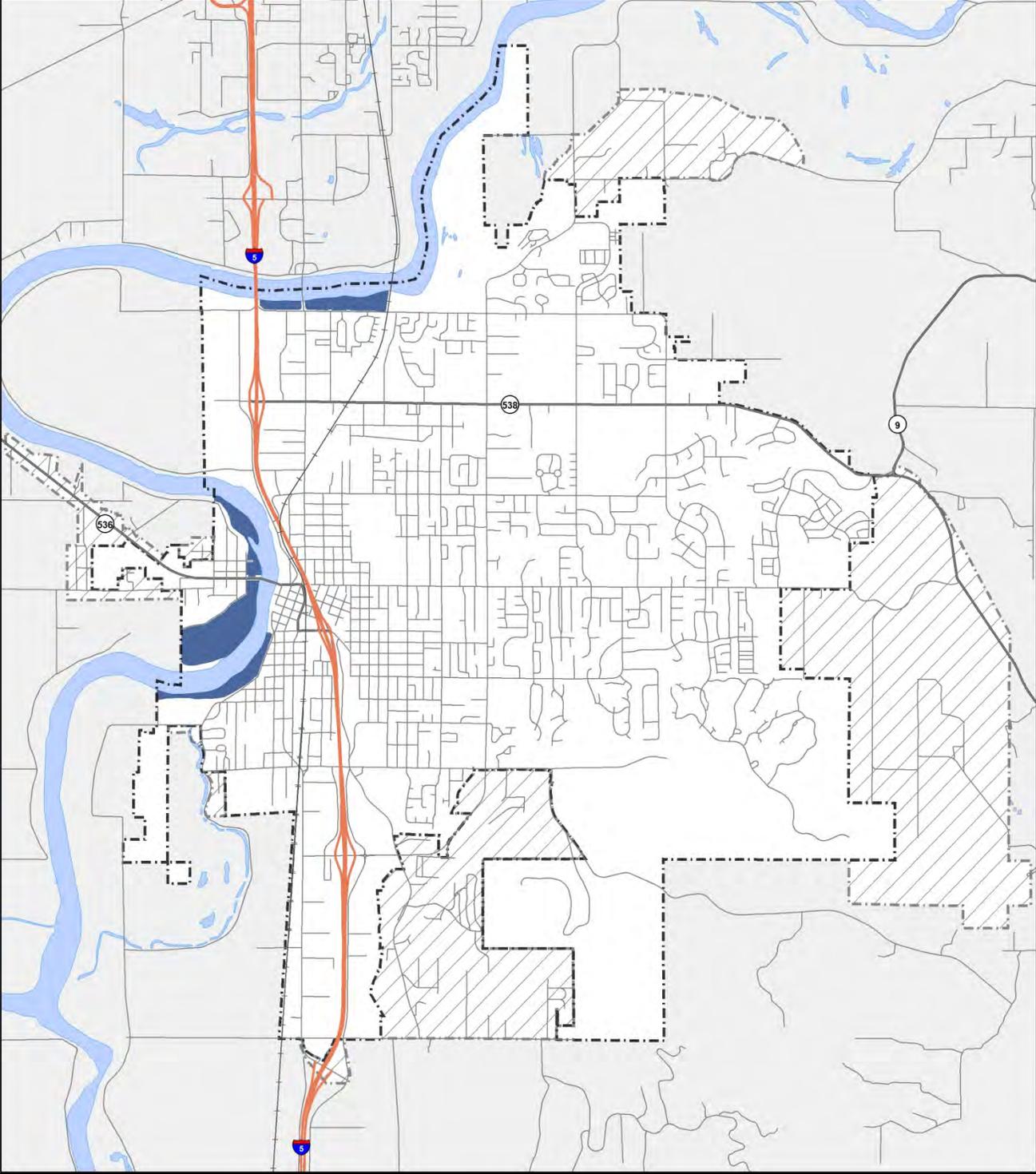
Since there is existing development within these areas, this development was inventoried and tabulated; however, it was assumed that no new development would occur.

There is one geographic area on the landward side of the existing levee, which is located to the north of Hoag Road, east of Interstate-5 and west of the Burlington-Northern railroad tracks that was not considered as an area where additional homes would be constructed due to the close proximity of the existing levee system to the Skagit River. The analysis only inventoried and tabulated the existing homes in this area.

6.4: STEEP SLOPES

Digital orthophotographic mapping was created for the City in the summer of 2000 by Entranco and Triathlon Mapping. This mapping was then used to create topographic maps for the City. The digital topographic maps were utilized to identify slopes over forty percent (40%) that were then considered undevelopable for this inventory.

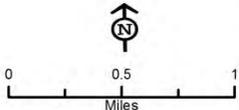
In addition, a 25-foot buffer from the top, toe and sides of any areas with a slope over forty percent (40%) was also deemed undevelopable. Slopes over 40% are shown on map 12.0.



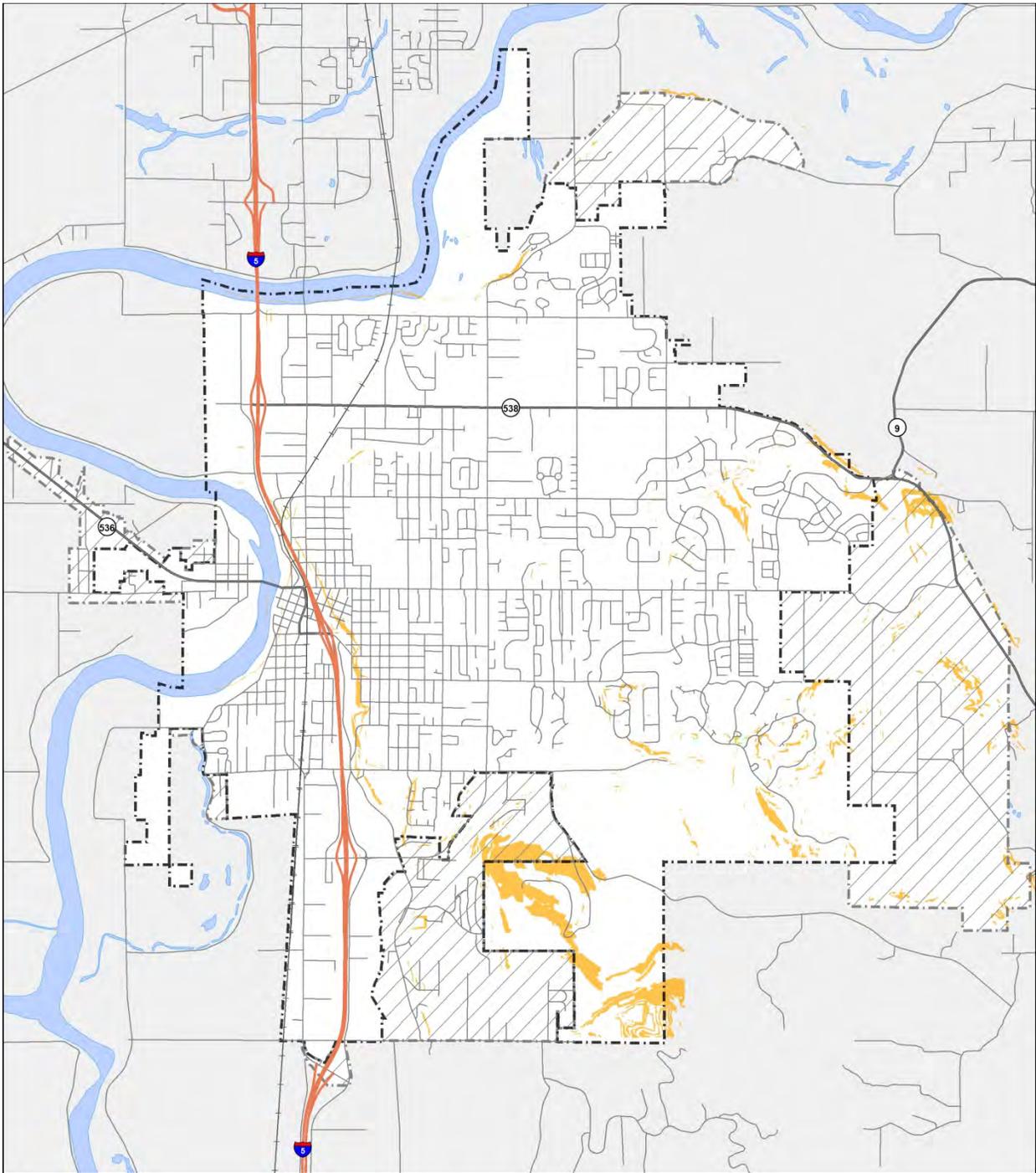
Map 11.0 - Floodways



- City Boundary
- UGA Boundary
- Floodways



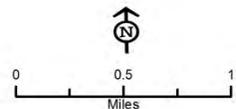
Map by MV GIS 3/31/2016



Map 12.0 - Steep Slopes



- City Boundary
- UGA Boundary
- Steep Slopes (>40%)



Map by MV GIS 3/31/2016

7.0

RESULTS & CONCLUSIONS

Table 1.11 identifies the different land uses within the City and the amount of land available for development and/or the number of dwelling units that could be constructed.

What is clear from this table is that the City is easily able to accommodate its expected additional population over the planning horizon. In fact, nearly ninety-percent (90%) of the needed dwelling units can be housed within the existing City limits.

What is also clear is that the City may not have enough commercial or industrial land to meet future employment growth. In fact, the 2006 E.D. Hovee report, “City of Mount Vernon Commercial & Industrial Land Needs Analysis” (attached as Appendix C to the City’s Land Use Element) states that the City needed an additional 809 gross acres of commercial/industrial lands when this report was completed in 2006.

The methodology used in determining how many additional dwelling units could be created, and the available acreage of commercial and industrial lands, is explained in detail in the foregoing analysis; however, keep in mind that areas to account for future roads (including arterials, neighborhood, collector, access ways, and private streets), stormwater facilities (including larger facilities to take into account newer regulations), critical areas and their associated buffers, neighborhood parks, schools, and market factors have all been netted out.

TABLE 1.11: BUILDABLE LAND RESULTS

RESIDENTIALLY ZONED LANDS		IN CITY ²	UGA ²	TOTAL NEW UNITS CITY + UGAS BEFORE MARKET FACTOR REDUCTION	20% MARKET FACTOR REDUCTION	TOTAL NEW DWELLING UNITS CITY + UGAS
	Single-Family ¹ Residential	1,282	5,355	6,637	< 1,328 >	5,309
	Multi-Family Residential ³	345	0	345	< 69 >	276
	Existing Pipeline Developments ⁴	1,888	0	1,888	NA	1,888
	Downtown Master Plan Units	450	NA	450	NA	450
	Mixed Use Units ⁵	69	NA	69	< 14 >	55
	Transfer of Development Rights	135	0	135	NA	135
	ADUS/Duplexes	67	0	67	< 13 >	54
TOTALS:	4,236	5,355	9,591	< 1,424 >	8,167	

COMMERCIAL/INDUSTRIAL LANDS		2,000 to 10,000 s.f.	> 10,000 s.f. to 1-acre	> 1-acre to 5-acres	> 5-acres
	Commercial ¹	5.5 acres	23.1 acres	14.6 acres	25.3 acres
	Industrial ²	5.9 acres	27.9 acres	65.9 acres	6.7 acres
	Healthcare District	.42 acres	.82 acres	NA	NA
	Downtown Waterfront	NA	NA	3.2 acres	NA
	UGA Commercial/Industrial	1.2 acres	6.3 acres	9.9 acres	0
	TOTALS:	13 acres	58 acres	93.6 acres	32 acres



APPENDIX 1

DATA TABLES 1 TO 7

TABLE 1:

**SHORT PLAT
ROAD RIGHT-OF-WAY AND DETENTION POND PERCENTAGES¹**

SHORT PLAT APPLICATION NAME	LOCATION SEC/TWP/RGE	SITE AREA	# OF LOTS IN PLAT	DETENTION POND SIZE	% OF SITE TAKEN UP WITH POND
Spiller – LU05-012	16 / 34N / 04E	.42 acres	2	None Required	0%
Broman – LU05-058	20 / 34N / 04E	.79 acres	5	N/A Vault Under Road Constructed	0%
Monte Vista – LU05-076	15 / 34N / 04E	10.28 acres	4	.04 acre	.4%
Woodmansee - LU05-078	22 / 34N / 04E	2 acres	6	None Required	0%
Zylstra – LU05-101	20 / 34N / 04E	.57 acres	4	None Required	0%
B & M – LU05-102	20 / 34N / 04E	.44 acres	2	None Required	0%
Ash – LU06-033	29 / 34N / 04E	.88 acres	2	None Required	0%
Davis/Hansen – LU06-056	15 / 34N / 04E	.65 acres	2	None Required	0%
Hoyt – LU06-082	15 / 34N / 04E	1.66 acres	5	.07 acre	4%
Monte Vista (Eyre) – LU06-084	15 / 34N / 04E	1.28 acres	3	None Required	0%
Murphy – LU07-046	8 / 34N / 04E	5.93 acres	4	None Required	0%
Ash – LU07-049	29 / 34N / 04E	1.34 acres	5	Underground plus .04 acre	3%
Pederson – LU07-051	21 / 34N / 04E	1.44 acres	4	None Required	0%
Wharton – LU07-064	22/ 34N / 04E	.94	3	None Required	0%
Nielsen – LU08-025	20/ 34N / 04E	.29	2	None Required	0%
BYK – LU09-021	20/ 34N / 04E	.37	2	None Required	0%
Skjei – LU09-038	9/ 34N / 04E	9.74	4	None Required	0%
McMonagle Short Plat – PL15-099	28 / 34N / 04E	.65 acre	2	None Required	0%
Overall Average:					.41%

¹ All of the short plats listed are either final, have received preliminary plat approval, or have been reviewed for technical completeness with their density and infrastructure approved in concept.

TABLE 2:

STANDARD PLATS (NOT SHORT PLATS)¹

ROAD RIGHT-OF-WAY AND DETENTION POND PERCENTAGES IN

PLAT NAME	LOCATION SEC/TWP/RGE	SITE AREA	# OF LOTS	RIGHT-OF- WAY (ROW)	% OF SITE IN ROW	POND SIZE ²	% OF SITE POND
Spinnaker Cove Division 2	15 / 34N / 4E	6.47 acres	14	.87 acre	13%	*	*
Gilberts Addition	21 / 34N / 4E	5.29 acres	23	.46 acre	9%	*	*
Kulshan Ridge PUD	17 / 34N / 4E	7.67 acres	33	1.16 acres	15%	.79	10%
Rosewood PUD	9 / 34N / 4E	37.02 acres	248	7.7 acres	21%	1.62	4%
Trumpeter Meadows	16 / 34N / 4E	8.4 acres	34	1.5 acres	18%	.4	5%
Eastgate South	31 / 34N / 4E	7.8 acres	27	1.29 acres	17%	.43	6%
Northwoods Plat	9 / 34N / 4E	9.7 acres	33	1.9 acres	20%	*	*
Big Fir North PUD	28 / 34N / 4E	12.87 acres	48	3.2 acres	25%	.52 acre	4%
Big Fir South PUD	28 / 34N / 4E	9.9 acres	33	1.4 acres	14%	.51 acre	5%
Trumpeter Meadows Phase 2	16 / 34N / 4E	3.9 acres	15	.68 acre	17%	.36	9%
Montreaux PUD	22 / 34N / 4E	33.9 acres	120	3.47 acres	10%	*	*
Iris Meadows TDR Plat	28 / 34N / 4E	12.7 acres	58	2.13 acres	17%	.6	5%
Hanson Heights Plat	21 / 34N / 4E	7.2 acres	18	1.39 acres	19%	*	*
Summerlyn Plat	30 / 34N / 4E	1.66 acres	11	.14 acre	8%	.09 acre	5%
Hillcrest Landing Plat	29 / 34N / 4E	7.56 acres	33	1.09 acres	14%	.20 acre	3%
Cedar Heights West	22 / 34N / 4E	8.2 acres	38	1.17 acres	14%	*	*
Cedar Heights PUD I LU05-010	22 / 34N / 4E	41 acres	221	6.77 acres	17%	*	*
Cedar Heights PUD, Phase II (now Woodside) LU07- 009	22 / 34N / 4E	37.6 acres	197	6.3 acres	17%	*	*
Highland Greens Division 1 LU04-093	09 / 34N / 4E	23.7 acres	114	5.1 acres	22%	*	*
Highlands West (Twin Brooks)	22 / 34N / 4E	40.2 acres	76	4.3 acres	11%	.55 acre	1.4%
Parkwood Creek (Twin Brooks 1)	22 / 34N / 4E	5 acres	11	.56	11%	.22 acre	4%
Trumpeter Place LU07-023	15 / 34N / 4E	16 acres	76	1.94	12%	1.3 acres	8%
Jacosa Lane	16 / 34N / 4E	3.37 acres	19	.75 acre	22%	.15 acre	5%

Pinnacle Resources	09 / 34N / 4E	2.9 acres	12	.45 acre	16%	*	*
Digby Heights TDR Plat	21 / 34N / 4E	32.50 acres	147	4.6 acres	14%	.64 acre	2%
Nordic Landing Phases 1 and 2	16 / 34N / 4E	21.5 acres	73	3.3 acres	15%	.41 acres	2%
Overall Averages:					15.7%		4.9%

¹ All of the plats listed are either final, have received preliminary plat approval, or have been reviewed for technical completeness with their density and infrastructure approved in concept.

² Does not include low impact development facilities

* Drains to combined system, or detention not required, % not accurate representation

TABLE 3:

COMMERCIAL/INDUSTRIAL DEVELOPMENTS WITH INFRASTRUCTURE

BSP NAME AND LOCATION (SEC/TWP/RGE)	SITE ZONING & SITE AREA	NUMBER OF LOTS CREATED	AREA OF ROAD R-O-W OR ACCESS EASEMENT(S)	% OF SITE ENCUMBERED BY R-O-W	AREA OF STORMWATER FACILITIES	% OF SITE STORMWATER FACILITIES
Western Peterbilt BSP L99-0003 32/34N/4E	C-L 21.35 acres	9	1.14 acres	5%	2.35 acres	11%
Anderson Road, LLC PL03-0071 29/34N/4E	C-L 7.5 acres	4	.40 acre	5%	.47 acre	6%
Hilde Commercial Facility 97-0361 29/34N/4E	C-L 24 acres	12	1.27 acres	5%	1.69 acres	7%
Dimensional Communications 32/34N/04E	C-L (rezoned in 2009) 7.65 acres	3	.45 acre	6%	.40 acre (pond plus underground storage)	5%
REO Family Properties LU05-035 34/34N/04E	C-L 24 acres	12	1.11 acres	5%	.79 acre	3%
Smith/Burkland LU06-060 31/34N/04E	C-L 12.8 acres	6	.37 acre	3%	.43 acre	8%
UBSTRD, LLC LU07-039 15/34N/04E	C-4 1.38 acres	2	0 acres	0% (Waugh already built)	.22 acre storm	16%
Peterson LU09-022 31/34N/04E	C-L 6.47	4	.50 acre	8%	.39 acre	6%
WinCo Foods LU09-045 17/34N/04E	C-2 19.8 acres	9	1.4 acres	7%	1.44 acres (using 2005 DOE manual)	7%
Swanson LU09-037 17/34N/04E	C-2 1.46acres	3	.25 acre	17%	.14	10%
Watson LU09-045 18/34N/04E	C-2 4.25 acres	2	.55 acre	13%	.15 acre	4%
AVERAGES:				7 %		8 %

TABLE 4:

COMMERCIAL/INDUSTRIAL LOT SIZE SUMMARY

BSP NAME	SITE ZONING	NUMBER OF LOTS CREATED	SIZE OF LOTS CREATED
M.G. Hollander, etal MV-3-93 18, 34N, 4E	C-2	4	1.5 acres 3.4 acres 2.1 acres 1.9 acres
Alvin R. Aiken MV-2-94 17, 34N, 4E	C-2	2	.23 acre .36 acre
College Way Marketplace MV-1-94 18, 34N, 4E	C-2	14	5.0 acres .40 acre .87 acre .69 acre .77 acre .65 acre 3.9 acres 1.4 acres .74 acre .72 acre 4.3 acres 4.3 acres 4.2 acres 1.0 acre
Dai Sung Enterprise MV-1-99 18, 34N, 4E	C-2	4	1.7 acres .63 acre .52 acre .52 acre
Keith S. Johnson BSP 5-99 17, 34N, 4E	C-2	2	.98 acre 1.2 acres
Olsen College Way Property, LLC MV-3-00 17, 34N, 4E	C-2	2	.84 acre .82 acre
Mount Vernon Elks Lodge MV-4-01 18, 34N, 4E	C-2	3	2.4 acres .86 acre 1.2 acres
Jefferson Land Company, LLC MV-BSP-02-001 17, 34N, 4E	C-2	5	.81 acre 1.43 acres .48 acre .48 acre .48 acre
Scott Wammack MV-01-03BSP 17, 34N, 4E	C-2	2	.57 acre .77 acre
Riverside Business Park – BSP MV-01-01 17, 34N, 4E	C-2	1	.76 acre

BSP MV 1-98 BSP 17, 34N, 4E	C-2	7	.45 acre .40 acre .61 acre .61 acre .61 acre .36 acre .36 acre
Riverside Business Park – BSP MV-01-01 17, 34N, 4E	M-1	2	.84 acre 1.1 acres
Western Peterbilt BSP L99-0003 32, 34N, 4E	C-L	9	1.0 acre 1.0 acre 1.1 acres 1.8 acres 1.0 acre 1.0 acre 1.0 acre 4.5 acres 4.5 acres
Anderson Road LLC PL03-0071 29, 34N, 4E	C-L	4	1.6 acres 1.7 acres 1.3 acres 1.5 acres
Hilde Commercial Facility BSP 97-0361 29, 34N, 4E	C-L	12	.92 .6 1.05 1.24 1.21 1.22 1.26 4.00 1.02 1.84 1.40 5.31
TOTALS:		73	105.29 acres
AVERAGES:			1.44 acres

TABLE 5:

COMPARISON OF SUSPECTED & DELINEATED WETLANDS SUMMARY

PLAT OR DEVELOPMENT NAME	GROSS SITE AREA	NUMBER OF BUILDING LOTS CREATED	AREA OF DELINEATED WETLANDS	% OF SITE ENCUMBERED BY WETLANDS	% OF SITE SHOWN ENCUMBERED BY WETLANDS ON THE CITY INDICATOR MAP	DIFFERENCE BETWEEN ACTUAL DELINEATED WETLANDS AND WHAT IS IDENTIFIED ON CITY INDICATOR MAP
Rosewood P.U.D. 9, 34N, 4E	37.02 acres	152	4.9 acres	13%	100%	87% (↑ = more on indicator map than actually delineated)
Plat of Gilbert's Addition 21, 34N, 4E	5.3 acres	23	.63 acres (includes buffer)	12%	36%	24% ↑
Trumpeter Meadows 16, 34N, 4E	8.4 acres	34	.4 acres (includes buffer)	5%	80%	75% ↑
Trumpeter Meadows, Phase II 16, 34N, 4E	3.9 acres	15	.02	1%	84%	83% ↑
Eastgate South 21, 34N, 4E	7.8 acres	27	.38 acres	5%	97%	92% ↑
Spinnaker Cove, Div. 1 15, 34N, 4E	1.66 acres	7	0 acres	0%	100%	100% ↑
Spinnaker Cove, Div. 2 15, 34N, 4E	6.47 acres	14	2.2 acres (includes buffer)	34%	94%	60%
Highland Greens 9,34N, 4E	52.04 acres	262	.4 acre	1 %	74%	73% ↑
Kulshan Ridge P.U.D. 17, 34N, 4E	7.67 acres	33	1.18 acres	15%	100%	85% ↑
Security Investors Short Plat 9, 34N, 4E	2.09	2	0 acres	0%	76%	76% ↑
Plat of Northwoods 9, 34N, 4E	9.70 acres	33	0 acres	0%	77%	80% ↑
Big Fir P.U.D. 28, 34N, 4E	12.87 acres	52	.24 acre	2%	0%	2% (more on-site than shown on City indicator map)
Olsen College Way Property, LLC 17, 34N, 4E	1.66 acres	2	.01 acre	1%	45%	44% ↑
Keith S. Johnson BSP 17, 34N, 4E	2.17 acres	2	.19 acre	9%	30%	31% ↑
College Way Pump Station Site 15, 34N, 4E	.37 acre	N/A	0 acres	0%	88%	100% ↑

Short Plat PL01-0915 23, 34N, 4E	9.53 acres	2	1.97	21%	73%	46% ↑
Big Fir South PUD 28, 34N, 04E	9.9	33	.08 acres	0%	16%	16% ↑
Iris Meadows TDR Plat 28, 34N, 04E	12.7	58	.19 acres	1%	48%	47% ↑
Hanson Heights Plat 21, 34N, 04E	7.2	18	1.20 acres	17%	86%	69% ↑
Hillcrest Landing Plat 29, 34N, 04E	7.56	33	.20 acres (includes buffer)	3%	50%	47% ↑
Cedar Heights PUD (Phases I and II)	78.3	374	2.69	3%	23%	20% ↑
Digby Heights 21, 34N, 04E	32.5	147	1.05 acres (includes buffer)	3%	5%	2% ↑
Nordic Landing, Phases 1 and 2 16, 34N, 04E	22.9	75	.05 acres	0%	91%	91% ↑
WalMart 18, 34N, 04E	30 acres	3	0 acres	0%	52%	52% ↑
B & T Short Plat 32,34N,04E	6.34 acres	5	.02 acres	0%	16%	16% ↑
Smith/Burkland 31,34N,04E	12.8 acres	6	.15 acres	1%	22%	21% ↑
White Annexation Area 18, 34N, 04E	26 acres	N/A	0 acres	0%	48%	48% ↑
Woodmansee Swan View 9, 34N, 04E	29.2 acres	98	1.1 acres	4%	62%	58% ↑
Watson 18,34N,04E	4.25 acres	3	0 acres	0%	89%	89% ↑
South Mount Vernon Business Park 30, 34N, 04E	11.75 acres	12	0 acres	0%	66%	66% ↑
Northwest Eye Clinic 17, 34N, 04E	2.63 acres	Commercial Developmen t	.05 acres	2%	47%	45% ↑
Sigmar Lane Development for Skagit Council of Housing 16, 34N, 04E	5.93 acres	Multi-Family Developmen t	.02 acres	0%	27%	27% ↑
Ellis LaVenture Property (P26686) 20, 34N, 04E	1.75 acres	Commercial Developmen t	.29 acre	17%	98%	81% ↑
Charlie Ash Short Plat 29, 34N, 04E	1.33	5	0	0%	65%	65% ↑
Kulshan Landing Short Plat 17, 34N, 04E	2.24 acres	9	.16 acre	7%	69%	62% ↑
Echo Six, LLC 18, 34N, 04E	3.74	Commercial Developmen t	0	0%	70%	70% ↑

TOTALS:	477.67 acres		19.77 acres			
AVERAGES:				5%	61%	59% (when more wetlands indicated on a site from resource map)

TABLE 6:

PERMITS FOR ADUS AND DUPLEX CUPS FROM 2000 TO 2015

APPLICATION NAME & LAND USE NUMBER	ADDRESS	TYPE OF PERMIT ISSUED ADU OR CUP FOR DUPLEX
00-01	2917 Timothy Place	ADU
01-01	1011 Digby Road	ADU
01-02	412 Jefferson	ADU
02-03	2405 Kulshan	Duplex
01-005	Spruce & 15 th	Duplex
03-040	1801 Windsor	ADU
03-006	2321 Alison Ave.	Duplex
03-055	1621 Douglas	ADU
03-060	1011 Digby Road	Duplex
04-002	911 S. 27th	ADU
04-006	821 S. 25 th	ADU
04-009	1219 N. 18 th	Duplex
04-032	122 S. Baker	ADU
04-072	1505 E. Fir	ADU
05-012	3517 East College Way	Duplex
05-014	4220 Montgomery	ADU
05-045	227 N. LaVenture	Duplex
05-054	2227 North LaVenture	Duplex
05-059	2100 S. 19 th	ADU
05-063	1910 Forest Drive	ADU
05-068	2418 South 18 th	Duplex
05-075	2021 Bel Air Drive	ADU
05-080	1323 Waugh Road	Duplex
05-091	1507 Hillcrest Parkway	ADU
06-002	910 S. 11 th	ADU
06-006	227 N LaVenture	Duplex

06-008	3480 Rosewood	ADU
06-043	2104 15 th	Duplex
06-046	1620 Forest Drive	ADU
06-054	808 N. LaVenture	ADU
06-063	822 W. Lincoln	Duplex
06-088	1716 and 1704 South 18 th Street	2 Duplexes
07-041	4121 Seneca Drive	ADU
08-050	804 Digby Lane	ADU
09-030	227 N. LaVenture	Duplex
09-043	2410 Francis Road	ADU
09-049	1600 Britt Road	ADU
LU11-013	2020 Pacific Place	ADU
LU11-014	2120 Forest Drive	ADU
LU11-015	2616 Francis Road	ADU
LU11-016	2227 North LaVenture Road	ADU
LU11-020	1519 North 19 th Street	ADU
LU12-059	400 North 6 th Street	ADU
LU12-086	1029 South 30 th Street	ADU
PL13-019	2765 East Section Street	ADU
PL13-039	2419 South 18 th Street	Duplex
PL15-019	911 North Waugh Road	ADU
PL15-037	3525 Francis Road	ADU
PL15-049	2781 Martin Road	ADU

50 TOTAL ADU AND DUPLEX UNITS IN R-1 ZONING DISTRICTS BETWEEN 2000 AND 2015

TABLE 7:

EXISTING PIPELINE DEVELOPMENT/LOT COUNTS

PLAT/DEVELOPMENT NAME:	FILE NUMBER:	UNIT COUNT:	LOCATION:	STATUS:
Briar Development (Haggen) Phase II	MISC 98-4	20	P115979	Master Plan Approved
Briar Development (Haggen) Phase III	MISC 98-4	16	P27122	Master Plan Approved
Broman Short Plat	LU05-058	2	West side of 18 th , between Broadway and Section Streets	Final Plat Approved
Caldera Short Plat	LU05-056	10	West side of Waugh between College and Seneca	Final Plat Approved
Woodside (Cedar Heights Phase II PUD)	LU07-009	187	South side of Division between Waugh and Burlingame	Preliminary Plat Approved
Denham Plat	LU07-060	15	P27576	Preliminary Plat Approved
Eaglemont		507	South of Blackburn (if extended) and east of Little Mountain Road	Master Plan Approved – Several Phases Have Final and Preliminary Plat Approvals
Hanson Heights	LU07-037	18	P27230 and P27473	Preliminary Plat Approved
Harmon Short Plat	LU06-057	1	P24857	Preliminary Plat Approved
Highland Greens	LU04-093	83	North of Rosewood, east of Francis Road	Final PUD Approved, Final Plat Approved for Some Phases
Highlands West	LU05-024	64	West of Skagit Highlands north of Division	Final Plat Approved for 20 Lots Preliminary Approval 65 Lots
Hillcrest Landing	LU06-088	4	East of 18 th between Blackburn and Fowler	Final Plat Approved
Hoyt Short Plat	LU06-082	5		Preliminary Plat Approved
Iris Meadows	LU06-090	58	North of Blackburn east of 18 th Street	Preliminary Plat Approved
Jacosa Lane Plat	LU06-055	19		Preliminary Plat Approved
Maddox Creek Phase II		9	P109373	Preliminary PUD Approved
Maddox Creek Phase IV	LU07-021	19	P109374	Preliminary Plat Approved
Monte Vista Short Plat	LU05-076	4	P24783	Preliminary Plat Approved
Montreaux	LU05-085	43	P27545	Final Plat Approved on Phase I; Preliminary Plat Approved on Phase II
Murphy Short Plat	LU07-046	4	P24187	Preliminary Plat Approval
Nordic Landing I	LU07-018	3	East of 30 th between College Way and Martin	Final Plat Approved for 30 lots Preliminary Approval for 14 lots
Nordic Landing II	LU08-056	30	East of 30 th between College Way and Martin	Preliminary Approval
Parkwood Creek	LU06-087	8	North of Division, west of Skagit Highlands Parkway	Preliminary Plat Approved

Pinnacle (Juckett) Plat	LU09-020	12		Preliminary Plat Approval Master Plan, Development Agreement and PUD Approved
Skagit Highlands		39		
Summerlynd Plat	LU06-020	9		Final Plat Approved
Swan View	LU06-079	44		Preliminary Plat Approved
Trumpeter Place	LU07-023	66		Final Plat Approved
North Hill PUD		9	P122828	PUD and plat approval
Skjei Short Plat	LU09-038	2		
Hidden Lakes	LU06-073	365		Draft EIS nearly completed. Project Withdrawn by Applicant
Meadowlark Lane Plat	NA	9	P25776	
PBWA Properties, LLC	NA	3	P54714	
McLaughlin Road Plat	NA	13	P24835	
Downtown Redevelopment	NA	450		Master Plan Completed
Skagit Meadows	LU07-024	24	P104938	Site Plan Approved
Plat of Swan View	LU10-018	74	P24340 P24341	Application Withdrawn by Applicant
Carney MF	NA	4	P104758	
Browman Short Plat	NA	7	P28445	
East Division Street Plat	NA	28	P126391	
Blodgett Short Plat	NA	3	P28239	
East Division PBWA Ownership	NA	45	P27513 P131737 P27512	
TDRs	NA	135		

TOTAL: 2,473 dwelling units



APPENDIX C

**Skagit County Growth Projections
BERK Consulting
&
Skagit County's Countywide Planning Policies**

SKAGIT COUNTY GROWTH PROJECTIONS

Summary of Methods and Results, July 2014

INTRODUCTION AND APPROACH

The Growth Management Act (GMA) requires that counties consult cities and allocate population growth within a range of projections provided by the Washington State Office of Financial Management (OFM). GMA also requires that counties consult with cities and size their Urban Growth Areas (UGAs) based on growth over a 20-year period. Last, GMA requires that comprehensive plans and development regulations provide sufficient land capacity for development to accommodate allocated housing and employment growth. (RCW 36.70A.110 and 115)

The update of the Skagit Council of Government's regional transportation model, and the pending Skagit County and cities comprehensive plan updates due June 30, 2016, present an opportunity to update the countywide population and job targets and allocations. The targets and allocations will inform UGA sizing as well as transportation modeling.

Skagit County and its cities will plan for a 20-year period that for GMA planning purposes will be the growth from a base year of 2015 to a horizon year of 2036.

To begin this process the overall population and employment to be distributed to Skagit County as a whole was analyzed and recommendations from the Growth Management Act Technical Advisory Committee (Planners) were made. Once the overall numbers were set, both population and jobs needed to be allocated to each jurisdiction - which proved to be a more difficult task. The primary reason this task is more difficult is due to a timing issue. On one hand each jurisdiction needs a target to plan for; while at the same time they are updating or creating the information they need to show that they can accommodate that target, whether its population or employment. For example, it is difficult to say that Mount Vernon can accommodate a certain number of new residents between 2015 and 2036 until Mount Vernon's Buildable Lands Analysis is updated. However, having raised this timing issue it is important to point out that there is enough historical information to make very educated guesses with regard to the number of people or jobs that each jurisdiction can accommodate.

To overcome this challenge the Planners decided it would be best to consider initial allocations. Then each jurisdiction will proceed with creating or updating their Buildable Lands Analysis documents. After this data is collected, the allocations would be revisited and changes would be made (if necessary) due to factors such as having adequate land supply to support the number of new homes or jobs from the original allocation.

This two-step process is beneficial in that each jurisdiction is able to proceed with updating their Comprehensive Plans using a preliminary planned target. Yet, conversely, should data become available that shows that the overall target needs to be adjusted that can still be done.

Following is a summary of the process to-date and future steps to be taken:

- **Countywide Target for Both Population and Employment Created:** Completed
- **Urban and Rural Shares:** Allocate countywide growth to urban and rural geographies – Completed
- **UGA Allocations:** Determine initial population and employment allocations for individual UGAs – Planners' recommendation to GMA Steering Committee
- **Jurisdictions Update/Complete Buildable Lands Analysis:** Work in process by Planners
- **Reconcile the Population and Employment Allocations with Each Jurisdiction's Buildable Lands Analysis:** To be done after buildable lands analyses

- **Make Final Population and Employment Allocation Recommendations to the Growth Management Act Steering Committee and Request They Be Adopted:** To be done as final step in process

Since a number of policy decisions will be made following the adoption of the population and employment targets discussed within this report, the Planners made their recommendations based on the following overarching goals:

1. To set policies regarding growth that respects Skagit County’s unique character and protects the quality of life that we all enjoy here in Skagit County.
2. To accommodate the urban share of the population within existing UGAs or expansions of existing UGAs. The group was clear about not planning for population growth in non-municipal UGAs (such as Bayview Ridge, other than a few buildable residential lots) or fully contained communities.
3. To recommend a more robust employment target that plans for, and focuses on, economic growth that supports family wage jobs in Skagit County.

MODEL

BERK Consulting has collaborated with the Planners to develop a flexible growth model in Excel. Orange cells have drop down menus to choose scenario or assumptions. Results auto update when the selected alternative is applied. Exhibit 1 shows the Growth Model Dashboard, reflecting the different assumptions considered for countywide targets, urban and rural shares, and UGA allocations. Based on selected assumptions the model displays resulting population and employment targets and allocations. The model allows any population share percentage to be allocated to Bayview, including 0%, reflecting evolving County planning priorities there.

Exhibit 1. Growth Model Dashboard

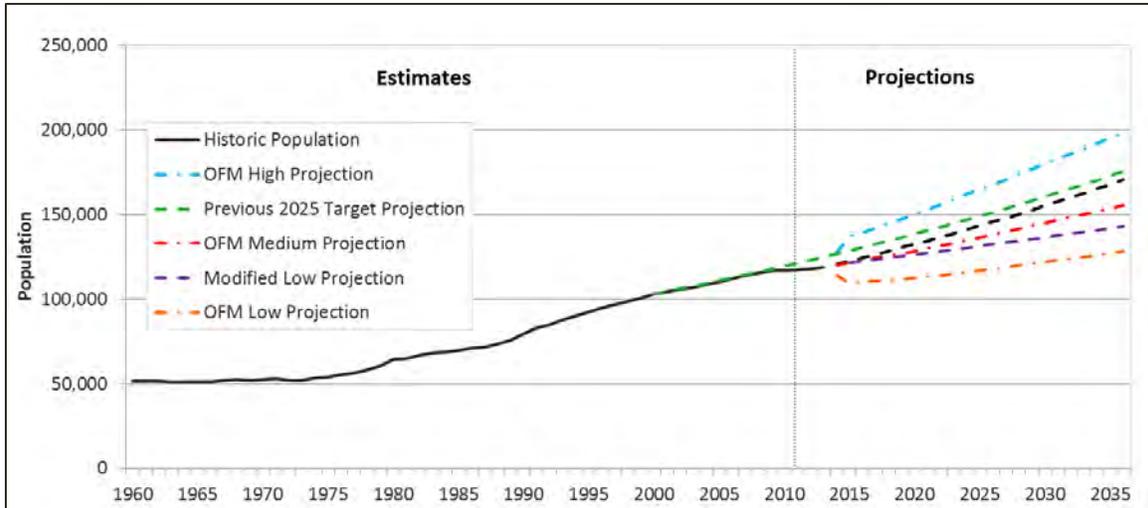
Selected Alternative					
Manual	OFM Medium	Locally preferred target	2.34	80/20 Urban Rural	Corridor Focus Share
Alternative Options					
	Pop Target	Emp Target Method	Pop:Emp Ratio	Urban Rural Split	UGA Allocation
Alternative 1	50-Year Trend	Pop:Emp Ratio	2.34	90/10 Urban Rural	Corridor Focus Share
Alternative 2	OFM Medium	ESD Forecast Growth Rate		80/20 Urban Rural	Corridor Focus Share
Alternative 3	Modified OFM Low	Pop:Emp Ratio	2.48	75/25 Urban Rural	Current Share
Alternative 4	OFM Medium	Locally preferred target		80/20 Urban Rural	Current Share
Manual	OFM Medium	Locally preferred target		80/20 Urban Rural	Corridor Focus Share
Pop:Emp Ratio, Current Scenario		BVR Population Assumption			
Current (2012)	2.36	Share of growth	0.0%		
Growth ('12-'36)	2.00				
Total	2.27				

Source: BERK Consulting 2014

POPULATION PROJECTIONS AND ALLOCATIONS

Starting with the OFM 2012 projections of population, factors were assessed that might affect which countywide projections to accept for the planning process. Factors that were considered included: components of population change – natural and migration; historical growth rates; adjustments in previous OFM projections; and other unique factors and trends potentially affecting population growth. Historic growth and the 2012-2040 OFM growth projections are shown in Exhibit 2.

Exhibit 2. 1960-2040 Population Growth



Source: Office of Financial Management, historical data and May 2012 projections

Countywide Target: The OFM projections consider natural growth due to births and deaths as well as migration. The OFM Medium projection is considered the most likely. The OFM Medium projection is lower than the previous Skagit County 2025 Target if the latter was carried forward to 2040. The OFM Medium projection was adjusted downward due to the Great Recession.¹ Following a review of trends, the population targets under consideration included:

- **OFM Medium**
- **50-Year Trend:** Start with OFM Medium Forecast 2012. From start year of 2015 apply the observed 50-Year Growth Rate (years 1960-2013) to year 2036.
- **Modified OFM Low:** Start with OFM Medium Forecast 2012. From start year of 2015 apply OFM Low Growth Rate to year 2036.

Urban and Rural Shares: Based on a review of permit trends, growth has tended to occur in UGAs as directed by GMA and local goals. In 2012, Skagit County considered several methods to estimate urban/rural growth trends; results generally show the County and cities achieved a 79% urban and 21% rural growth split over the years 2000-2010, similar to the 2025 Growth Target policy of an 80/20 split.² The 80/20 split is one scenario considered. A second model scenario assumed a 90/10 urban and rural split based on Envision 2060 policies, and reflecting uncertainty over water in rural areas outside of public water systems. A third model scenario provides a lower bookend, with a 75% urban, 25% rural share, assuming growth is not as focused in urban areas.

UGA Allocations: Allocations at individual geographies are based on each community's current share of population, except that the percentage share of population to Bayview should be determined based on changing County policy priorities; then any Bayview reallocation can be spread to other UGAs based on their current share.

¹ See OFM summary at http://www.ofm.wa.gov/POP/gma/local_review/skagit.pdf.

² Recognizing the planning level analysis and imperfect year 2000 census geographies (improved in 2010), using 2010 Census blocks and tracking permits for more accuracy in the future is recommended; this process could be set up as part of a forthcoming land capacity method.

Planners' Population Recommendations

The Planners have developed population growth and allocation recommendations based on OFM Medium projections allocated to urban and rural areas by an 80/20 split reflecting trends and policy. UGAs would receive a share of population based on their current shares. Bayview population would be reduced to 0.2% to recognize the small number of existing buildable lots (~22-23), and reallocated based on the current shares to remaining UGAs. See Exhibit 3.

Exhibit 3. Planners' Recommended Initial Population Growth and Distribution Allocation

UGA	2012 Population	2012-2015 Population Growth Forecast	2015-2036 Population Growth Forecast	2015-2036 Population Growth Forecast Allocation Percent	2036 Population Growth Forecast Allocation
Anacortes	16,090	308	5,895	16.5%	22,293
Burlington	10,393	71	3,808	10.7%	14,272
Mount Vernon	33,935	1,034	12,434	34.8%	47,403
Sedro-Woolley	12,431	83	4,555	12.7%	17,069
Concrete	873	0	320	0.9%	1,193
Hamilton	310	3	114	0.3%	427
La Conner	898	-1	329	0.9%	1,226
Lyman	441	2	162	0.5%	605
Bayview Ridge	1,812	-1	72	0.2%	1,883
Swinomish	2,489	15	912	2.6%	3,416
Rural (outside UGAs)	38,277	238	7,150	20.0%	45,665
Total	117,949	1,752	35,751	100.0%	155,452

Notes: The figures apply to cities/towns including their associated UGAs.

Source: BERK Consulting 2014

With the recommended population allocations, the Planners deliberately did not include urban growth allocations for future fully contained communities or non-municipal UGAs such as Bayview Ridge (other than a minor population allocation to Bayview Ridge reflecting existing buildable residential lots). Based on review of historical data and local knowledge, the Planners anticipate that new non-municipal UGAs or fully contained communities should not be necessary to accommodate future population growth within the 20-year planning period.

The Planners also expressed a desire to have policies put in place that recognize the unique quality of life and rural character of Skagit County and that planning efforts for further growth should reflect the desire to protect and preserve that character while promoting a robust economy that compliments the policy to preserve and protect Skagit County's rich agricultural and resource heritage.

EMPLOYMENT PROJECTIONS AND ALLOCATIONS

For employment, the historical relationship between population and employment was considered to calibrate the countywide employment projection. The industry split also considered the following factors: Current industry distributions; recent trends and industry shifts; Washington State Employment Security Department (ESD) mid-term industry projections; and other unique factors and trends identified by the County and cities including an industrial lands analysis that has been underway at the time of this writing.

ESD Industry Projections. A key source of information for the countywide target and sector splits is ESD's industry projections for the Northwest region of the state, including Whatcom, Skagit, San Juan and Island counties. ESD produces 2-year, 5-year and 10-year projections. These projections are based on the following steps:

There are two steps to industry projections. The first step is developing aggregated statewide industry projections using the Global Insight model. The second step produces detailed industry projections. The principal data source for industry projections is a detailed covered employment time series of four-digit NAICS data for all Washington counties, specifically, the U.S. Bureau of Labor Statistics, Quarterly Census of Employment and Wages (QCEW).³

The projections used in this process assumed that 5-year growth rates would be applied to the base 2012 Total Employment estimates and carry forward in the 20-year planning period (2015-2036). The growth rates using broad sector categories are shown in Exhibit 4 below. See the Attachment for more detailed projections by industry. A “cross-walk” of the detailed North American Industry Classification System (NAICS) sectors to the summary sectors is also provided in the Attachment.

**Exhibit 4. ESD 2013 Industry Projections for Northwest Counties
 Summarized by Employment Model Categories**

Sector	2011	2016	2021	CAGR 2011-2016	CAGR 2016-2021
Resource	600	600	600	0.0%	0.0%
WTCU	17,200	20,200	22,100	3.3%	1.8%
Manufacturing	14,300	15,800	16,600	2.0%	1.0%
Retail	19,700	20,700	20,900	1.0%	0.2%
FIRES	41,800	46,200	48,600	2.0%	1.0%
Edu	1,600	1,800	2,000	2.4%	2.1%
Health	16,400	18,000	19,100	1.9%	1.2%
Gov	32,800	33,400	36,100	0.4%	1.6%
Total	144,400	156,700	166,000	1.6%	1.2%

Abbreviations: Compound Annual Growth Rate (CAGR), Warehouse Transportation Communications Utilities (WTCU), Finance Insurance Real Estate Services (FIRES), Education (Edu), Government (Gov)

Source: ESD 2013; BERK 2014

As shown above, the resource sector is not projected to grow, and Warehouse Transportation Communications Utilities (WTCU) is expected to grow the most. The 2013 Employment Projections prepared by ESD for 2-year, 5-year and 10-year timeframes were not accompanied by detailed explanations (see footnote 3). However, OFM has issued a document explaining statewide long-term employment trends and appears to rely on ESD-generated long-term industry forecasts. For example, OFM documentation indicates why the retail sector is likely to see less growth in the future than other sectors. “One factor affecting the retail employment forecast is the expectation that increases in total personal income will be slower in the next 30 years than was the case between 1970 and 2010.”⁴

Non-Farm Jobs: ESD projections are for nonfarm jobs. ESD defines this in part as follows:

Employment is the total number of persons on establishment payrolls employed full or part time who received pay for any part of the pay period which includes the 12th day of the month. Temporary and intermittent employees are included, as are any workers who are on paid sick leave, on paid holiday, or who work during only part of the specified pay period. A striking worker who only works a small portion of the survey period, and is paid, would be included as employed under the CES definitions. Persons on the payroll of

³ Employment Security Department. July 2013. 2013 Employment Projections. Available: <https://fortress.wa.gov/esd/employmentdata/docs/industry-reports/employment-projections-2013.pdf>. Also see: <https://fortress.wa.gov/esd/employmentdata/reports-publications/industry-reports/employment-projections>.

⁴ See “Long-Term Forecast of Washington Wage and Salary Employment” at <http://www.ofm.wa.gov/economy/longterm/2012/lt2012ch3.pdf>.

more than one establishment are counted in each establishment. Data exclude proprietors, self-employed, unpaid family or volunteer workers, farm workers, and domestic workers.

The BERK model allocations rely on ESD projections of nonfarm jobs. Jobs that are excluded in the projections of “nonfarm jobs” are not necessarily central to the purpose of sizing UGAs. Sole-proprietor jobs are not land consumptive as they may occur at existing homes. Resource lands of long-term significance including agriculture, are protected under Skagit County’s Comprehensive Plan, and can add jobs or not and change their agricultural activities from one type to another. Farm jobs may not be “peak hour” jobs necessary to model for transportation purposes. Farm employment is often seasonal.

While farm jobs are not included in the employment target or allocations, some related activities are included, such as processing facilities; however, processing facilities are considered industrial jobs.

Countywide Target: Countywide employment projections were developed, some based on a population/employment ratio assumption and some based on ESD growth rates applied to the 2012 job base independent of population growth.

- The job projection based on ESD mid-term growth rates equals 16,559 over the 2012-2036 period (or 14,795 for the 2015-2036 period).
- Using a population/employment ratio of 2.34 (similar to the 2012 ratio) and the OFM Medium Population Forecast, the resulting jobs would equal 17,041 over the 2012-2036 period (or 15,278 over the 2015-2036 period).
- Considering trends as well as policy choices of increased family wage job creation such as at Bayview and other UGAs, one option explored increased jobs over ESD growth rates resulting in 17,763 jobs over the 2012-2036 period (16,000 jobs over 2015-2036).

Urban and Rural Growth Shares and UGA Allocations: One allocation scenario, “current share”, assumes that each UGA’s current share of jobs is carried forward. Sector splits for this scenario are based on ESD forecasts.

A second scenario is “corridor trends share” which assumes that the growth rate within the 2002-2011 period would occur moving forward for four market areas⁵: Anacortes, I-5 Corridor, Towns & Tribal Land, and Rural; however, the sector splits (manufacturing, retail, etc.) are based on ESD mid-term projections. As a result, communities along I-5 would have a greater share of employment growth; within the corridor itself a greater share of manufacturing jobs would be allocated to Bayview and less to Mount Vernon and Burlington, reflecting recent Bayview Subarea Planning efforts and limited UGA expansion opportunities for industrial land in those two cities. Anacortes shows a reduced share based on the trend period. However, the 10-year trend from 2002-2011 would mean more growth to Towns & Tribal Land relative to current shares; this trend may not continue post-recession and is explored in the third scenario below.

A third scenario “corridor focus share” also assumes more growth towards the I-5 Corridor. This scenario also provides a share for Anacortes that is between the current share and 2002-2011 based share, a Towns & Tribal Land share similar to the current share, and a reduced Rural share. Similar to the “corridor trends” approach, a greater share of jobs would be allocated to Bayview and less to Mount Vernon and Burlington, reflecting recent Bayview Subarea Planning efforts and limited expansion opportunities for industrial land in those two cities. As with the other scenarios, sector splits are based on ESD forecasts.

⁵ While some geographies lost jobs in some sectors over the 2002-2011 time period, the model does not assume that continues. The model uses the 2002-2011 trends to determine among the “market areas” what share of growth would be captured. The actual employment growth and sector splits are based on ESD forecasts.

Exhibit 5 shows the relative shares of each approach.

Exhibit 5. Share of Employment Growth (2012-2036) to Market Areas: Future Scenario

MARKET AREA	Current Share	Corridor Trends Share	Corridor Focus Share
Anacortes	16.4%	10.2%	11.0%
I-5 Corridor <i>Bayview Ridge, Burlington, Mount Vernon, Sedro-Woolley</i>	63.0%	66.5%	80.0%
Towns & Tribal Land <i>Concrete, Hamilton, La Conner, Lyman, Swinomish</i>	5.2%	14.3%	5.0%
Rural	15.4%	9.0%	4.0%
Total	100%	100%	100%

Source: BERK Consulting 2014

The “current share” results in a 15.4% rural job percentage, leaving nearly 85% of jobs inside UGAs. The “corridor trends share” approach assumes more jobs are attracted along the I-5 corridor and Towns and Tribal Land where most urban areas and infrastructure are located in the county; thus, 9.0% is the rural share, and 91% the urban share. The “corridor focus share” assumes the share of Rural jobs would decrease comparing current shares to 2002-2011 trends, and thus the share of growth is 96% urban and 4% rural.

Planners’ Employment Recommendations

The Planners have considered countywide employment projections similar to but greater than ESD growth rates reflecting policy choices for greater family wage jobs and industrial growth. The total growth selected is: 17,763 jobs over the 2012-2036 period (16,000 jobs over 2015-2036).

The Planners considered the three scenarios described above regarding how jobs could be allocated to UGAs. The corridor trend or corridor focus shares propose a greater share of industrial growth to Bayview Ridge. Exhibit 6 shows the results.

Exhibit 6. Employment Growth and Distribution Scenarios

A. Current Share

UGA	2012	Net Growth 2012-2015	Sector Splits					Net Growth 2015-2036	Total 2036	Percent: 2015-2036
			Resource	Retail	Industrial	Services	GovEdu			
Anacortes	8,166	304	0	69	1,010	969	576	2,610	11,080	16.30%
Burlington	9,467	366	0	267	1,003	1,154	575	3,008	12,840	18.80%
Mount Vernon	16,024	522	0	177	1,189	2,064	1,703	5,149	21,695	32.20%
Sedro-Woolley	4,594	152	0	41	364	581	490	1,476	6,223	9.20%
Concrete	347	11	0	13	0	12	88	112	470	0.70%
Hamilton	214	10	0	1	55	7	5	67	292	0.40%
La Conner	1,053	42	0	57	0	112	167	335	1,429	2.10%
Lyman	28	1	0	1	4	1	3	9	38	0.10%
Bayview Ridge	1,434	63	0	1	437	14	8	451	1,948	2.80%
Swinomish	925	32	0	16	0	163	121	299	1,256	1.90%
Rural	7,749	260	0	45	1,057	694	686	2,485	10,493	15.50%
Total 2015-2036	50,001	1,763	0	688	5,119	5,771	4,422	16,001	67,764	
Percent			0.00%	4.30%	32.00%	36.10%	27.60%	100.00%		

Notes: The figures for cities/towns include their associated UGAs. Sector splits are based on ESD projections. ESD mid-term growth rates were applied to 2012 base employment. ESD Projections are for non-farm jobs and exclude proprietors, self-employed, unpaid family or volunteer workers, farm workers, and domestic workers.

Source: BERK Consulting 2014

B. Corridor Trends Share

UGA	2012	Net Growth 2012-2015	Sector Splits					Net Growth 2015-2036	Total 2036	Percent: 2015-2036
			Resource	Retail	Industrial	Services	GovEdu			
Anacortes	8,166	187	0	71	568	640	353	1,628	9,982	10.20%
Burlington	9,467	390	0	272	1,093	1,217	618	3,201	13,058	20.00%
Mount Vernon	16,024	436	0	180	844	1,803	1,527	4,373	20,833	27.30%
Sedro-Woolley	4,594	144	0	41	344	565	479	1,433	6,172	9.00%
Concrete	347	31	0	27	27	33	228	312	689	1.90%
Hamilton	214	23	0	2	136	32	20	188	426	1.20%
La Conner	1,053	110	0	72	188	336	341	931	2,093	5.80%
Lyman	28	3	0	1	11	7	6	25	55	0.20%
Bayview Ridge	1,434	202	0	1	1338	255	44	1627	3,263	10.20%
Swinomish	925	91	0	26	74	425	305	823	1,839	5.10%
Rural	7,749	146	0	46	599	353	454	1,458	9,353	9.10%
Total 2015-2036	50,001	1,763	0	739	5,222	5,666	4,375	15,999	67,763	
Percent			0.00%	4.60%	32.60%	35.40%	27.30%	100.00%		

Notes: The figures for cities/towns include their associated UGAs. Sector splits are based on ESD projections. ESD mid-term growth rates were applied to 2012 base employment. ESD Projections are for non-farm jobs and exclude proprietors, self-employed, unpaid family or volunteer workers, farm workers, and domestic workers.

Source: BERK Consulting 2014

C. Corridor Focus Share

UGA	2012	Net Growth 2012-2015	Resource					Net Growth 2015-2036	Total 2036	Percent: 2015-2036
			Retail	Industrial	Services	GovEdu				
Anacortes	8,166	201	0	76	596	678	406	1,753	10,120	11.00%
Burlington	9,467	470	0	328	1,270	1,483	771	3,852	13,789	24.10%
Mount Vernon	16,024	523	0	217	989	2,066	1,975	5,266	21,813	32.90%
Sedro-Woolley	4,594	172	0	50	411	630	632	1,727	6,493	10.80%
Concrete	347	11	0	9	8	8	85	109	467	0.70%
Hamilton	214	8	0	1	47	12	7	66	289	0.40%
La Conner	1,053	38	0	25	62	116	124	326	1,417	2.00%
Lyman	28	1	0	0	4	3	2	9	37	0.10%
Bayview Ridge	1,434	242	0	1	1570	341	60	1959	3,635	12.20%
Swinomish	925	32	0	9	21	152	108	288	1,245	1.80%
Rural	7,749	65	0	21	249	169	205	646	8,459	4.00%
Total 2015-2036	50,001	1,763	0	737	5,227	5,658	4,375	16,001	67,764	
Percent			0.00%	4.60%	32.70%	35.40%	27.30%	100.00%		

Notes: The figures for cities/towns include their associated UGAs. Sector splits are based on ESD projections. ESD mid-term growth rates were applied to 2012 base employment. ESD Projections are for non-farm jobs and exclude proprietors, self-employed, unpaid family or volunteer workers, farm workers, and domestic workers.

Source: BERK Consulting 2014

Additional Scenarios. After a review of the three scenarios in Exhibit 6 by the Planners, three more scenarios were developed as illustrated in Exhibit 7.

First, a scenario tested a different Rural share that matched more recent trends. The I-5 Corridor share was made 75% and the Rural share 9%, with no changes to Anacortes or the Towns & Tribal Land shares under “corridor focus share”. Thus, I-5 Cities’ shares are slightly reduced compared to the “corridor focus share”.

Second, a scenario assumed Anacortes and the I-5 Corridor market areas would become one market area considered “Cities & Bayview” and together allocated 90%, with Towns & Tribal Land at 5% and Rural at 5%. This would increase Anacortes’ share relative to other scenarios, with slight reductions in shares for Burlington, Mount Vernon, and Sedro-Woolley.

Third, both of the scenarios above are combined with a Rural trend at 9%, with the combined Cities & Bayview category at 86%, leaving a moderate Towns & Tribal Land share of 5%.

Exhibit 7. Additional Employment Growth and Distribution Scenarios

A. Corridor Focus Share with Recent Rural Trend

UGA	2012	Net Growth					GovEdu	Net Growth	Total 2036	Percent: 2015-2036
		2012-2015	Resource	Retail	Industrial	Services				
Anacortes	8,166	202	0	78	596	681	401	1,756	10,124	11.0%
Burlington	9,467	441	0	313	1,169	1,400	729	3,611	13,519	22.6%
Mount Vernon	16,024	493	0	207	895	1,996	1,819	4,917	21,434	30.7%
Sedro-Woolley	4,594	162	0	48	379	609	580	1,616	6,372	10.1%
Concrete	347	11	0	9	7	8	85	109	467	0.7%
Hamilton	214	8	0	1	48	11	7	67	289	0.4%
La Conner	1,053	38	0	26	63	115	125	329	1,420	2.1%
Lyman	28	1	0	0	4	3	2	9	38	0.1%
Bayview Ridge	1,434	228	0	1	1,483	309	55	1,848	3,510	11.6%
Swinomish	925	32	0	9	22	150	109	290	1,247	1.8%
Rural	7,749	147	0	47	557	381	462	1,447	9,343	9.0%
Total 2015-2036	50,001	1,763	0	739	5,223	5,663	4,374	15,999	67,763	
<i>Percent</i>			0.0%	4.6%	32.6%	35.4%	27.3%	100.00%		

Notes: The figures for cities/towns include their associated UGAs. Sector splits are based on ESD projections. ESD mid-term growth rates were applied to 2012 base employment. ESD Projections are for non-farm jobs and exclude proprietors, self-employed, unpaid family or volunteer workers, farm workers, and domestic workers.

Source: BERK Consulting 2014

B. Cities & Bayview Market Focus and Moderate Towns & Tribal Land and Rural Share

UGA	2012	Net Growth					GovEdu	Net Growth	Total 2036	Percent: 2015-2036
		2012-2015	Resource	Retail	Industrial	Services				
Anacortes	8,166	316	-	121	927	1,068	642	2,758	11,240	17.2%
Burlington	9,467	427	-	301	1,161	1,338	703	3,502	13,396	21.9%
Mount Vernon	16,024	474	-	199	903	1,866	1,802	4,771	21,269	29.8%
Sedro-Woolley	4,594	156	-	46	370	574	578	1,567	6,317	9.8%
Concrete	347	11	-	9	8	8	85	110	468	0.7%
Hamilton	214	8	-	1	46	13	8	67	289	0.4%
La Conner	1,053	38	-	25	61	116	125	328	1,419	2.1%
Lyman	28	1	-	0	4	3	2	9	38	0.1%
Bayview Ridge	1,434	220	-	1	1,410	320	62	1,793	3,447	11.2%
Swinomish	925	32	-	9	21	151	109	291	1,248	1.8%
Rural	7,749	81	-	26	313	206	259	804	8,634	5.0%
Total 2015-2036	50,001	1,764	0	738	5,224	5,663	4,375	16,000	67,765	
<i>Percent</i>			0.00%	4.60%	32.70%	35.40%	27.30%	100.00%		

Notes: The figures for cities/towns include their associated UGAs. Sector splits are based on ESD projections. ESD mid-term growth rates were applied to 2012 base employment. ESD Projections are for non-farm jobs and exclude proprietors, self-employed, unpaid family or volunteer workers, farm workers, and domestic workers.

Source: BERK Consulting 2014

C. Combination: Cities and Bayview Market Focus,
Recent Rural Trend, and Moderate Towns & Tribal Land Share

UGA	2012	Net Growth 2012-2015	Resource	Retail	Industrial	Services	GovEdu	Net Growth 2015-2036	Total 2036	Percent: 2015-2036
Anacortes	8,166	302	0	117	886	1,025	608	2,629	11,097	16.4%
Burlington	9,467	409	0	291	1,091	1,288	676	3,346	13,222	20.9%
Mount Vernon	16,024	456	0	192	837	1,832	1,695	4,573	21,053	28.6%
Sedro-Woolley	4,594	150	0	44	348	563	541	1,500	6,244	9.4%
Concrete	347	11	0	9	7	8	85	109	467	0.7%
Hamilton	214	8	0	1	47	12	7	66	288	0.4%
La Conner	1,053	38	0	26	62	115	125	326	1,417	2.0%
Lyman	28	1	0	0	4	3	2	9	38	0.1%
Bayview Ridge	1,434	210	0	1	1,356	298	58	1,702	3,346	10.6%
Swinomish	925	32	0	9	22	149	110	288	1,245	1.8%
Rural	7,749	147	0	47	561	374	465	1,452	9,348	9.1%
Total 2015-2036	50,001	1,764	0	737	5,221	5,667	4,372	16,000	67,765	
Percent			0.00%	4.60%	32.60%	35.40%	27.30%	100.00%		

Notes: The figures for cities/towns include their associated UGAs. Sector splits are based on ESD projections. ESD mid-term growth rates were applied to 2012 base employment. ESD Projections are for non-farm jobs and exclude proprietors, self-employed, unpaid family or volunteer workers, farm workers, and domestic workers.

Source: BERK Consulting 2014

Recommended Scenario: Based on a review of all scenarios in Exhibit 6 and Exhibit 7, the Planners have developed recommended initial allocations that reflect trends in the Rural area at 9%, a share of jobs in Anacortes at 13% reflecting that local jurisdiction’s review of employment data and discussions with local businesses, the I-5 Corridor share predominating at 73% and a Towns & Tribal Land share of 5%. See Exhibit 8.

Exhibit 8. Planners’ Recommended Initial Employment Growth and Distribution Allocation

UGA	2012	Net Growth 2012-2015	Resource	Retail	Industrial	Services	GovEdu	Net Growth 2015-2036	Total 2036	Percent: 2015- 2036
Anacortes	8,166	238	0	92	702	806	476	2,076	10,480	13.0%
Burlington	9,467	429	0	305	1,141	1,360	710	3,516	13,412	22.0%
Mount Vernon	16,024	479	0	201	874	1,936	1,774	4,785	21,288	29.9%
Sedro-Woolley	4,594	158	0	46	368	592	566	1,572	6,324	9.8%
Concrete	347	11	0	9	7	8	85	109	467	0.7%
Hamilton	214	8	0	1	47	11	7	66	288	0.4%
La Conner	1,053	38	0	26	63	115	125	329	1,420	2.1%
Lyman	28	1	0	0	4	3	2	9	38	0.1%
Bayview Ridge	1,434	222	0	1	1,436	305	57	1,799	3,455	11.2%
Swinomish	925	32	0	9	22	150	109	290	1,247	1.8%
Rural	7,749	147	0	47	558	379	463	1,447	9,343	9.0%
Total 2015-2036	50,001	1,763	0	737	5,222	5,665	4,374	15,998	67,762	
Percent			0.0%	4.6%	32.6%	35.4%	27.3%	100.0%		

Notes: The figures for cities/towns include their associated UGAs. Sector splits are based on ESD projections. ESD mid-term growth rates were applied to 2012 base employment. ESD Projections are for non-farm jobs and exclude proprietors, self-employed, unpaid family or volunteer workers, farm workers, and domestic workers.

Source: Skagit Council of Governments 2014; BERK Consulting 2014

Jobs and Employment Acres: Following the adoption of the GMA in 1990, Comprehensive Plan updates in Skagit County have allocated jobs to each jurisdiction by converting each job into a metric of acres for ease of use by each jurisdiction. The conversion from jobs to acres was accomplished using industry accepted ratios as documented in the 1995 Overall Economic Development Plan for Skagit County.

Early in this current process, the Planners expressed a desire to allocate employment instead of acreage with these Comprehensive Plan updates. The main reason for this departure from historic practices was to provide each jurisdiction with more flexibility with how jobs are inventoried and how they may be allocated. For instance, a jurisdiction may have jobs that are trending more towards industrial uses versus professional office uses meaning that they need a greater land base than what was originally allocated – the number of jobs would be the same but the acreage would be different. Additionally, there has been legislation adopted by the State that limits certain jurisdictions from expanding their UGAs into floodplains (RCW 36.70a.110). Affected jurisdictions may need to concentrate more heavily on job creation that utilizes less land than they historically had.

As noted in the Introduction and Approach section, it is anticipated that each jurisdiction will conduct a Buildable Lands Analysis. These analyses should include common assumptions and ongoing tracking procedures to ensure that analyses are consistent across Skagit County and land development is tracked on a regular basis to see how jurisdictions are accommodating allocated population and employment. The precise methodology for the Buildable Lands Analyses has not yet been developed, but the Planners will be developing it in the near future.

ATTACHMENT: INDUSTRY PROJECTIONS AND CROSSWALK TABLES

ESD Northwest County Industry Projections

ESD NORTHWEST REGION EMPLOYMENT PROJECTIONS					
Source: Employment Security Department/LMEA					
Industry employment projections, May 2013					
Industry	Estimated employment 2011	Estimated employment 2016	Estimated employment 2021	Average annual growth rate 2011-2016	Average annual growth rate 2016-2021
TOTAL NONFARM	144,400	156,700	166,000	1.6%	1.2%
NATURAL RESOURCES and MINING	600	600	600	0.0%	0.0%
Logging	400	400	400	0.0%	0.0%
Mining	200	200	200	0.0%	0.0%
CONSTRUCTION	9,200	11,600	13,200	4.7%	2.6%
MANUFACTURING	14,300	15,800	16,600	2.0%	1.0%
Durable goods	8,200	9,400	10,000	2.8%	1.2%
Wood product manufacturing	1,500	1,800	1,700	3.7%	-1.1%
Nonmetallic mineral product manufacturing	400	500	500	4.6%	0.0%
Fabricated metal product manufacturing	800	1,000	1,100	4.6%	1.9%
Machinery manufacturing	1,300	1,800	2,200	6.7%	4.1%
Computer and electronic product manufacturing	400	400	500	0.0%	4.6%
Electrical equipment and appliance mfg	300	300	400	0.0%	5.9%
Other transportation equipment	1,200	1,300	1,200	1.6%	-1.6%
Non durable goods	6,100	6,400	6,600	1.0%	0.6%
Food and beverages manufacturing	3,100	3,200	3,400	0.6%	1.2%
Printing and related support activities	200	200	100	0.0%	-12.9%
WHOLESALE TRADE	4,000	4,200	4,400	1.0%	0.9%
RETAIL TRADE	19,700	20,700	20,900	1.0%	0.2%
Food and beverage stores	4,000	4,100	4,100	0.5%	0.0%
Motor vehicle and parts dealers	2,200	2,300	2,300	0.9%	0.0%
Other retail trade	13,500	14,300	14,500	1.2%	0.3%
TRANSPORTATION, WAREHOUSING AND UTILITIES	4,000	4,400	4,500	1.9%	0.5%
Utilities	500	500	500	0.0%	0.0%
Transportation and warehousing	3,500	3,900	4,000	2.2%	0.5%
INFORMATION	2,600	2,700	2,900	0.8%	1.4%
FINANCIAL ACTIVITIES	5,800	6,400	6,800	2.0%	1.2%
Finance and insurance	4,100	4,600	4,900	2.3%	1.3%
Real estate, rental and leasing	1,700	1,800	1,900	1.1%	1.1%
PROFESSIONAL and BUSINESS SERVICES	10,800	12,800	14,000	3.5%	1.8%
Professional, scientific and technical services	5,200	5,800	6,000	2.2%	0.7%
Management of companies and enterprises	700	800	800	2.7%	0.0%
Other professional services	3,800	4,600	5,200	3.9%	2.5%
Employment services	1,100	1,600	2,000	7.8%	4.6%
EDUCATION and HEALTH SERVICES	18,000	19,800	21,100	1.9%	1.3%
Education services	1,600	1,800	2,000	2.4%	2.1%
Health services and social assistance	16,400	18,000	19,100	1.9%	1.2%
LEISURE and HOSPITALITY	16,500	17,800	18,300	1.5%	0.6%
Arts, entertainment and recreation	2,600	2,900	3,100	2.2%	1.3%
Accommodation and food services	13,900	14,900	15,200	1.4%	0.4%
OTHER SERVICES	6,100	6,500	6,600	1.3%	0.3%
GOVERNMENT	32,800	33,400	36,100	0.4%	1.6%
Federal government	3,300	3,100	3,100	-1.2%	0.0%
State and local government other	14,400	14,400	15,100	0.0%	1.0%
Government educational services	15,100	15,900	17,900	1.0%	2.4%

NAICS Codes and Model Allocations

2-Digit	Description	Allocation Group
11	Agriculture, Forestry, Fishing and Hunting	Resource
21	Mining	Resource
22	Utilities	Industrial
23	Construction	Industrial
31	Manufacturing	Industrial
32	Manufacturing	Industrial
33	Manufacturing	Industrial
42	Wholesale Trade	Industrial
44	Retail Trade	Retail
45	Retail Trade	Retail
48	Transportation and Warehousing	Industrial
49	Transportation and Warehousing	Industrial
51	Information	Services
52	Finance and Insurance	Services
53	Real Estate and Rental and Leasing	Services
54	Professional, Scientific, and Technical Services	Services
55	Management of Companies and Enterprises	Services
56	Administrative and Support and Waste Management and Remediation Services	Services
61	Educational Services	Gov/Edu
62	Health Care and Social Assistance	Services
71	Arts, Entertainment, and Recreation	Services
72	Accommodation and Food Services	Retail
81	Other Services (except Public Administration)	Services
92	Public Administration	Gov/Edu

Skagit County

Countywide Planning Policies

October 10, 2007

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Skagit County Countywide Planning Policies

The Role of the Skagit County Countywide Planning Policies and the Comprehensive Plan

- i These countywide planning policies shall be the foundation for the Skagit County Comprehensive Plan.
- ii All Elements of the Comprehensive Plan, including maps and procedures, shall comply with these policies. Amendments to the other components of the comprehensive plan shall conform to these policies.
- iii As required by RCW 36.70A.120, all implementing regulations, including zoning maps and zoning regulations, shall be consistent with and implement these policies. Amendments to the implementing regulations shall conform to these policies.
- iv As required by RCW 36.70A.120, all planning, land use permitting actions and capital budgeting decisions shall be made in conformity with the adopted comprehensive plan.
- v The Skagit County Comprehensive Plan adopts by reference the following functional plans: Shoreline, Drainage, Floodplain, Schools, Special Districts, Parks and Recreation, Transportation, Watershed, the Coordinated Water System Plan and any other functional plans adopted by Skagit County. Each referenced plan shall be coordinated with, and consistent with, the Comprehensive Plan.
- vi All disputes over the proper interpretation of other functional plans and all implementing regulations, including zoning maps and zoning regulations, shall be resolved in favor of the interpretation which most clearly achieves Countywide Planning Policies.
- vii Skagit County shall pursue methods of collecting and displaying statistics, maps and other information necessary for government.
- viii Upon adoption of the county-wide Comprehensive Plan, sub-area plans will be considered to address homogeneous natural features and communities.
- ix A definition section will be incorporated into the final Comprehensive Plan document. Some definitions are clearly articulated in state statutes and local government implementing ordinances or regulations. Other words which are undefined at this time will be clarified through the Element development process.

1. Urban Growth

Encourage urban development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner.

- 1.1 Urban growth shall be allowed only within cities and towns, their designated UGAs and within any non-municipal urban growth areas already characterized by urban growth, identified in the County Comprehensive Plan with a Capital Facilities Plan meeting urban standards. Population and commercial/industrial land allocations for each UGA shall be consistent with those allocations shown in the following table:

Urban Growth Areas	Residential Population (2025)	Commercial/Industrial Land Allocations (New)
Anacortes	18,300	558
Bayview Ridge ¹	5,600	750
Burlington	12,000	242
Concrete	1,350	28
Hamilton	450	60
La Conner	950	2
Lyman	550	0
Mount Vernon	47,900	959
Sedro-Woolley	15,000	278
Swinomish	3,650	0
Urban Growth Area Total²	105,750	2,877

¹ The residential population has been placed in a reserve category until the completion of the Bayview Ridge subarea plan. At that time, it will either be accommodated in the proposed Bayview Ridge UGA, reallocated to other UGAs, or a combination thereof. The Port of Skagit County has 258 acres of the designated commercial / industrial properties. A sub-area plan and implementing regulations were adopted for the Bayview Ridge UGA; the urban standards set forth in this plan/regulations for roads, sewer, and stormwater shall meet or exceed those in effect in the City of Burlington on April 1, 1999. Police and Fire services shall, at a minimum, meet the requirements of CPP 1.7.

² The projected 2025 population for the remainder of Skagit County, outside of Urban Growth Areas, is 43,330. Adding that to the Urban Growth Area total cited above results in a total County population of 149,080. The Growth Management Act does not require a commercial/industrial land allocation for the rural area.

- 1.2 Cities and towns and their urban growth areas, and non-municipal urban growth areas designated pursuant to CPP 1.1, shall include areas and densities sufficient to accommodate as a target 80% of the county's 20 year population projection.
- 1.3 Urban growth areas shall provide for urban densities of mixed uses and shall direct development of neighborhoods which provide adequate and accessible urban governmental services concurrent with development. The GMA defines urban governmental services as those governmental services historically and typically delivered by cities, and includes storm and sanitary sewer systems, domestic water systems, street cleaning services, fire and police protection services, public transit services, and other public utilities associated with urban areas and normally not associated with nonurban areas.
- 1.4 Urban growth areas shall include greenbelt, open space, and encourage the preservation of wildlife habitat areas.
- 1.5 Cities shall encourage development, including greenbelt and open space areas, on existing vacant land and in-fill properties before expanding beyond their present corporate city limits towards urban growth boundaries.
- 1.6 Annexations beyond urban growth areas are prohibited.
- 1.7 Development within established urban growth boundaries shall, as a minimum, conform to those urban development standards in effect within the respective municipality as of April, 1, 1999. Bayview Ridge UGA urban standards for roads, sewer, and stormwater shall meet or exceed those in effect in the City of Burlington on April 1, 1999. UGAs with populations of over 1500 or a Commercial/Industrial land allocation (new) over 100 acres shall have, as a minimum, the following levels of urban law enforcement and fire service levels:

Law Enforcement:

One commissioned law enforcement officer per 1,000 population served or per 100 acres of developed commercial or industrial property, whichever is the higher number.

Fire:

Urban fire level of service standard for Urban Growth Areas are as follows:

1. For Cities and their adjacent Urban Growth Areas, an ISO grading of 5 or better shall be maintained; otherwise

2. Within 5 minutes of being dispatched, the Fire Department shall arrive and be able to deliver up to 200 gallons per minute fire flow in an offensive (interior) attack, with a minimum of 4 firefighters, for responses to: structural fires, vehicle fires, other outside fires, motor vehicle accidents, activated fire alarm systems, or other hazardous conditions. The Fire Department shall also be capable of delivering a minimum of Basic Life Support including defibrillation, with a minimum of one First Responder or Emergency Medical Technician, for medical responses.

Within 10 minutes of being dispatched, the Fire Department shall be able to support the interior structural fire attack with teams which may include: a ventilation team, a search & rescue team, a team for a backup line, and standby firefighters, totaling between 8 and 12 firefighters on-scene. The Fire Department shall also be capable of providing Heavy Rescue capability, including heavy hydraulics, at Motor Vehicle Accidents.

Within 20 minutes of being dispatched, the Fire Department shall be capable of delivering 1500 gallons per minute fire flow in a sustained defensive attack mode for structural fire responses. For buildings larger than 10,000 square feet, the Fire Department shall be capable of delivering 2000 Gallons per Minute, and shall have an elevated master stream capability.

These requirements shall be met for 90% of all incidents.

Mutual aid requested under the Mutual Aid Contract may be used to provide relief to the initial operating crews, but shall not be used to provide initial attack capability, support functions, or sustained attack capability. This does not preclude automatic aid agreements under separate contract which does provide these capabilities or functions from other agencies.

Times are considered to be "Response Time," which shall be measured by the sum of turnout time (the time from dispatch until the first arriving unit is enroute to the incident), plus travel time. Dispatch time shall be allocated a maximum of 1 additional minute which is measured from the time the 9-1-1 call is received until the fire department is dispatched.

All operations shall be conducted in compliance with state and federal regulations, including training requirements for firefighters, and maintenance requirements for equipment and apparatus.

All commercial and industrial facilities shall be inspected for compliance with the Uniform Fire Code at least annually. Water systems shall be installed in accordance with the Skagit County Coordinated Water System Supply Plan, with a fire flow meeting the requirements of the Uniform Fire Code.

- 1.8 All growth outside the urban growth boundary shall be rural in nature as defined in the Rural Element, not requiring urban governmental services, except in those limited circumstances shown to be necessary to the satisfaction of both the County and the affected city to protect basic public health, safety and the environment, and when such services are financially supportable at rural densities and do not permit urban development.

2. Reduce Sprawl

Reduce the inappropriate conversion of undeveloped land into sprawling, low-density development.

- 2.1 Contiguous and orderly development and provision of urban services to such development within urban growth boundaries shall be required.
- 2.2 Development within the urban growth area shall be coordinated and phased through inter-agency agreements.
- 2.3 Rural development shall be allowed in areas outside of the urban growth boundaries having limited resource production values (e.g. agriculture, timber, mineral) and having access to public services. Rural development shall have access through suitable county roads, have limited impact on agricultural, timber, mineral lands, critical areas, shorelands, historic landscapes or cultural resources and must address their drainage and ground water impacts.
- 2.4 Rural commercial and industrial development shall be consistent with that permitted by the Growth Management Act, specifically including RCW 36.70A.070(5)(d) and related provisions and the 1997 ESB 6094 amendments thereto. This development shall not be urban in scale or character or require the extension of urban services outside of urban growth areas, except where necessary to address an existing public health, safety or environmental problem.
- 2.5 Rural commercial and industrial development shall be of a scale and nature consistent and compatible with rural character and rural services, or as otherwise allowed under RCW 36.70A.070(5)(d), and may include commercial services to serve the rural population, natural resource-related industries, small scale businesses and cottage industries that provide job opportunities for rural residents, and recreation, tourism and resort development that relies on the natural environment unique to the rural area.
- 2.6 Priority consideration will be given to siting of new rural commercial and industrial uses in areas of existing development, including existing Rural Villages and existing Rural Centers, followed by already developed sites in the rural area, and only lastly to wholly undeveloped sites in the rural area.
- 2.7 Master planned sites designated for industrial and large-scale commercial uses shall be clustered, landscaped, and buffered to alleviate adverse impacts to surrounding areas.
- 2.8 Commercial areas should be aggregated in cluster form, be pedestrian oriented, provide adequate parking and be designed to accommodate public transit. Strip commercial development shall be prohibited.

- 2.9 Urban commercial and urban industrial development, except development directly dependent on local agriculture, forestry, mining, aquatic and resource operations, and major industrial development which meets the criteria contained in RCW 36.70A.365, should be restricted to urban or urban growth areas where adequate transportation networks and appropriate utility services are available.

The process to consider siting of specific major industrial developments outside of urban growth areas shall follow the process included in the Memorandum of Understanding between the County and the cities for adoption of Countywide Planning Policies. Major industrial developments shall mean a master planned location for specific manufacturing, industrial, or commercial business that:

1. Requires a parcel of land so large that no suitable parcels are available within an urban growth area; or
2. Is a natural resource-based industry requiring a location near agricultural land, forest land, or mineral resource land upon which it is dependent. The major industrial development shall not be for the purpose of retail commercial development or multi-tenant office park.

A major industrial development may be approved outside an urban growth area if the following criteria are met:

1. New infrastructure is provided for and/or applicable impact fees are paid;
2. Transit-oriented site planning and traffic demand management programs are implemented;
3. Buffers are provided between the major industrial development and adjacent non-urban areas;
4. Environmental protection including air and water quality has been addressed and provided for;
5. Development regulations are established to ensure that urban growth will not occur in adjacent non-urban areas;
6. Provision is made to mitigate adverse impacts on designated agricultural lands, forest lands, and mineral resource lands;
8. The plan for the major industrial development is consistent with the County's development regulations established for the protection of critical areas; and

9. An inventory of developable land has been conducted and the County has determined and entered findings that land suitable to site the major industrial development is unavailable within the urban growth area. Priority shall be given to applications for sites that are adjacent to or in close proximity to the urban growth areas.

Final approval of an application for a major industrial development shall be considered an adopted amendment to the Comprehensive Plan adopted pursuant to RCW 36.70A.070 designating the major industrial development site on the land use map as an urban growth area. Final approval of the application shall not be considered an amendment to the Comprehensive Plan for the purposes of RCW 36.70A.130(2) and may be considered at any time.

- 2.10 Establishment or expansion of local improvement districts and special purpose taxing districts, except flood control, diking districts and other districts formed for the purpose of protecting water quality, in designated commercial forest resource lands shall be discouraged.

3. Transportation

Encourage efficient multimodal transportation systems that are based on regional priorities and coordinated with county and city comprehensive plans.

- 3.1 Multi-purpose transportation routes and facilities shall be designed to accommodate present and future traffic volumes.
- 3.2 Primary arterial access points shall be designed to ensure maximum safety while minimizing traffic flow disruptions.
- 3.3 The development of new transportation routes and improvements to existing routes shall minimize adverse social, economic and environmental impacts and costs.
- 3.4 The Transportation Element of the Comprehensive Plan shall be designed to; facilitate the flow of people, goods and services so as to strengthen the local and regional economy; conform with the Land Use Element of the Comprehensive Plan; be based upon an inventory of the existing Skagit County transportation network and needs; and encourage the conservation of energy.
- 3.5 Comprehensive Plan provisions for the location and improvement of existing and future transportation networks and public transportation shall be made in a manner consistent with the goals, policies and land use map of the Comprehensive Plan.
- 3.6 The development of a recreational transportation network shall be encouraged and coordinated between state and local governments and private enterprises.
- 3.7 The Senior Citizen and Handicapped transportation system shall be provided with an adequate budget to provide for those who, through age and/or disability, are unable to transport themselves.
- 3.8 Level of service (LOS) standards and safety standards shall be established that coordinate and link with the urban growth and urban areas to optimize land use and traffic compatibility over the long term. New development shall mitigate transportation impacts concurrently with the development and occupancy of the project.
- 3.9 An all-weather arterial road system shall be coordinated with industrial and commercial areas.

- 3.10 Cost effectiveness shall be a consideration in transportation expenditure decisions and balanced for both safety and service improvements.
- 3.11 An integrated regional transportation system shall be designed to minimize air pollution by promoting the use of alternative transportation modes, reducing vehicular traffic, maintaining acceptable traffic flow, and siting of facilities.
- 3.12 All new and expanded transportation facilities shall be sited, constructed and maintained to minimize noise levels.

4. Housing

Encourage the availability of affordable housing to all economic segments of the population of this state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock.

- 4.1 Local governments shall allow for an adequate supply of land use options to provide housing for a wide range of incomes, housing types and densities.
- 4.2 Public/private partnerships shall be encouraged to build affordable housing and devise incentives for innovative and environmentally sensitive design to meet the housing needs of people with low and moderate incomes and special needs populations.
- 4.3 The Comprehensive Plan should support innovative land use management techniques, including, but not limited to, density bonuses, cluster housing, planned unit developments and the transfer of development rights.
- 4.4 The existing affordable housing stock should be maintained and efforts to rehabilitate older and substandard housing, which are otherwise consistent with comprehensive plan policies, should be encouraged.
- 4.5 The construction of housing that promotes innovative, energy efficient and less expensive building technologies shall be encouraged.
- 4.6 Comprehensive Plan provisions for the location of residential development shall be made in a manner consistent with protecting natural resource lands, aquatic resources, and critical areas.
- 4.7 Manufactured home parks shall be allowed only within urban or urban growth boundary areas.

5. Economic Development

Encourage economic development throughout the state that is consistent with adopted comprehensive plans, promote economic opportunity for all citizens of this state, especially for unemployed and for disadvantaged persons, and encourage growth in areas experiencing insufficient economic growth, all within the capacities of the state's natural resources, public services, and public facilities.

- 5.1 The development of environmentally sensitive industries shall be encouraged.
- 5.2 Home occupations that do not significantly change or impact neighborhood character shall be permitted.
- 5.3 Economic diversity should be encouraged in rural communities where special incentives and services can be provided.
- 5.4 Commercial and industrial activities directly related to local natural resource production may be allowed in designated natural resource areas provided they can demonstrate their location and existence as natural resource area dependent businesses.
- 5.5 A diversified economic base shall be encouraged to minimize the vulnerability of the local economy to economic fluctuations.
- 5.6 Commercial, industrial and residential acreage shall be designated to meet future needs without adversely affecting natural resource lands, critical areas, and rural character and life styles.
- 5.7 Tourism, recreation and land preservation shall be promoted provided they do not conflict with the long-term commercial significance of natural resources and critical areas or rural life styles.
- 5.8 Agriculture, forestry, aquatic resources and mineral extraction shall be encouraged both within and outside of designated resource lands.
- 5.9 The primary land use within designated forest resource lands shall be commercial forestry. Residential development shall be strongly discouraged within designated forest resource lands.
- 5.10 Lands within designated agricultural resource areas should remain in large parcels and ownership patterns conducive to commercial agricultural operations and production.

- 5.11 Skagit County shall conserve agriculture, aquaculture, forest and mineral resources for productive use by designating natural resource lands and aquatic resource areas, where the principal and preferred land uses will be long term commercial resource management.
- 5.12 Value added natural resource industries shall be encouraged.
- 5.13 Skagit County shall increase the availability of renewable resources and encourage the maximum attainable recycling of non-renewable resources.
- 5.14 Commercial and industrial activities directly related to or dependent on local aquatic resource areas should be encouraged in shoreline areas provided they are shoreline dependent and/or related.
- 5.15 The Comprehensive Plan shall support and encourage economic development and employment to provide opportunities for prosperity.

6. Property Rights

Private property shall not be taken for public use without just compensation having been made. The property rights of landowners shall be protected from arbitrary and discriminatory actions.

- 6.1 Proposed regulatory or administrative actions shall not result in an unconstitutional taking of private property.
- 6.2 The rights of property owners operating under current land use regulations shall be preserved unless a clear public health, safety or welfare purpose is served by more restrictive regulation.
- 6.3 Surface water runoff and drainage facilities shall be designed and utilized in a manner which protects against the destruction of private property and the degradation of water quality.

7. Permits

Applications for both state and local government permits should be processed in a timely and fair manner to ensure predictability.

- 7.1 Inter-agency agreements with other agencies to facilitate multi-agency permits shall be pursued to better serve the public.
- 7.2 Upon receipt of a complete application, land use proposals and permits shall be expeditiously reviewed and decisions made in a timely manner.
- 7.3 Variances which would allow for a violation of Comprehensive Plan policies shall not be permitted.
- 7.4 New implementing codes and amendments shall provide clear regulations to reduce the possibility of multiple interpretations by staff and applicants.
- 7.5 Impact fees shall be imposed through established ordinances, procedures and criteria so that specific developments do not pay arbitrary fees or duplicative fees for the same impact.
- 7.6 Special purpose districts permitted by statute to request impact fees shall to the extent possible utilize similar formulas to calculate costs of new development.

8. Natural Resource Industries

Maintain and enhance natural resource-based industries, including productive timber, agricultural, and fisheries industries. Encourage the conservation of productive forest lands and productive agricultural lands, and discourage incompatible uses.

- 8.1 Identified critical areas, shorelands, aquatic resource areas and natural resource lands shall be protected by restricting conversion. Encroachment by incompatible uses shall be prevented by maintenance of adequate buffering between conflicting activities.
- 8.2 Land uses adjacent to agricultural, forest, or mineral resource lands and designated aquatic resource areas shall not interfere with the continued use of these designated lands for the production of food, agricultural and aquatic based products, or timber, or for the extraction of minerals.
- 8.3 Forest and agricultural lands located within urban growth areas shall not be designated as forest or agricultural land of long-term commercial significance unless a program authorizing transfer or purchase of development rights is established.
- 8.4 Mining sites or portions of mining sites shall be reclaimed when they are abandoned, depleted, or when operations are discontinued for long periods.
- 8.5 Long term commercially significant natural resource lands and designated aquatic resource areas shall be protected and conserved. Skagit County shall adopt policies and regulations that encourage and facilitate the retention and enhancement of natural resource areas in perpetuity.
- 8.6 When plats, short plats, building permits and development permits are issued for development activities on or adjacent to natural resource lands and aquatic resource areas, notice shall be provided to those seeking permit approvals that certain activities may occur that are not compatible with residences.
- 8.7 Fishery resources, including the county's river systems inclusive of their tributaries, as well as the area's lakes, associated wetlands, and marine waters, shall be protected and enhanced for continued productivity.
- 8.8 Skagit County shall encourage sustainable use of the natural resources of the County, including but not limited to agriculture, forestry, and aquatic resources.
- 8.9 Skagit County shall conserve agricultural, aquatic based, forest and mineral resources for productive use by designating natural resource lands and aquatic resource areas where the principal and preferred land uses will be long term commercial resource management.

9. Open Space and Recreation

Encourage the retention of open space and development of recreational opportunities, conserve fish and wildlife habitat, increase access to natural resource lands and water, and develop parks.

- 9.1 Open space corridors within and between urban growth areas shall be identified. These areas shall include lands useful for recreation, fish and wildlife habitat, trails, and connection of critical areas.
- 9.2 To preserve open space and create recreational opportunities, innovative regulatory techniques and incentives such as but not limited to, purchase of development rights, transfer of development rights, conservation easements, land trusts and community acquisition of lands for public ownership shall be encouraged.
- 9.3 The use of Open Space Taxation Laws shall be encouraged as a useful method of land use control and resource preservation.
- 9.4 Expansion and enhancement of parks, recreation and scenic areas and viewing points shall be identified, planned for and improved in shorelands, and urban and rural designated areas.
- 9.5 Property owners shall be encouraged to site and design new construction to minimize disruption of visual amenities and solar resources of adjacent property owners, public road ways, parks, lakes, waterways and beaches.
- 9.6 Development of new park and recreational facilities shall adhere to the policies set out in this Comprehensive Plan document.
- 9.7 The Skagit Wild and Scenic River System (which includes portions of the Sauk, Suiattle, Cascade and Skagit Rivers) is a resource that should be protected, enhanced and utilized for recreation purposes when there are not potential conflicts with the values (fisheries, wildlife, and scenic quality) of the river system.
- 9.8 Incompatible adjacent uses including industrial and commercial areas shall be adequately buffered by means of landscaping, or by maintaining recreation and open space corridors.
- 9.9 A park and recreation system shall be promoted which is integrated with existing and planned land use patterns.
- 9.10 Indoor and outdoor recreation facilities shall be designed to provide a wide range of opportunities allowing for individual needs of those using these facilities.

- 9.11 School districts, public agencies and private entities should work together to develop joint inter-agency agreements to provide facilities that not only meet the demands of the education for our youth, but also provide for public recreation opportunities that reduce the unnecessary duplication of facilities within Skagit County.

- 9.12 In planning new park and recreation facilities, Skagit County shall take into consideration natural features, topography, floodplains, relationship to population characteristics, types of facilities, various user group needs and standards of access including travel time.

10. Environment

Protect the environment and enhance the state's high quality of life, including air and water quality, and the availability of water.

- 10.1 Natural resource lands, including aquatic resource areas and critical areas shall be classified and designated, and regulations adopted to assure their long-term conservation. Land uses and developments which are incompatible with critical areas shall be prohibited except when impacts from such uses and developments can be mitigated.
- 10.2 Land use decisions shall take into account the immediate and long range cumulative effects of proposed uses on the environment, both on and off-site.
- 10.3 The County shall reduce the loss of critical aquatic and terrestrial habitat by minimizing habitat fragmentation.
- 10.4 Wetlands, woodlands, watersheds and aquifers are essential components of the hydrologic system and shall be managed to protect surface and groundwater quality.
- 10.5 Skagit County shall recognize the river systems within the County as pivotal freshwater resources and shall manage development within the greater watershed in a manner consistent with planning practices that enhance the integrity of the aquatic resource, fish and wildlife habitat, and recreational and aesthetic qualities.
- 10.6 Rural character shall be preserved by regulatory mechanisms through which development can occur with minimal environmental impact.
- 10.7 Development shall be directed away from designated natural resource lands, aquatic resource areas and critical areas.
- 10.8 The conversion of tidelands to uplands by means of diking, drainage and filling shall be prohibited, except when carried out by a public body to implement a Comprehensive Plan for flood plain management or to respond to a natural disaster threatening life and property.
- 10.9 Septic systems, disposal of dredge spoils and land excavation, filling and clearing activities shall not have an adverse significant affect on Skagit County waters with respect to public health, fisheries, aquifers, water quality, wetlands, wildlife habitat, natural marine ecology and aquatic based resources.
- 10.10 Usual and accustomed activities on natural resource lands and aquatic resource areas shall be protected from interference when they are conducted in accordance with best management practices and environmental laws.

- 10.11 When evaluating and conditioning commercial, industrial or residential development, Skagit County shall consider threatened or endangered wildlife.
- 10.12 Skagit County shall enter into inter-agency agreements with appropriate state and local agencies and Native American Tribes for compliance with watershed protection, including but not limited to, the cumulative effects of construction, logging and non-point pollution in watersheds.
- 10.13 Skagit County and Cities and Towns, in cooperation with appropriate local, state and Federal agencies, shall develop and implement flood hazard reduction programs, consistent with and supportive of the Corps Feasibility Study.
- 10.14 The Skagit River Floodway and the Skagit River Floodplain shall be regulated to protect human life, property and the public health and safety of the citizens of Skagit County; minimize the expenditure of public money; and maintain flood insurance eligibility while avoiding regulations which are unnecessary restrictive or difficult to administer.
- 10.15 Skagit County and Cities and Towns shall work together to provide ongoing public education about flooding in a coordinated and consistent program, and shall adopt a flood hazard reduction plan, that works together with the natural and beneficial functions of floodplains.

11. Citizen Participation

Encourage the involvement of citizens in the planning process and ensure coordination between communities and jurisdictions to reconcile conflicts.

- 11.1 Skagit County shall maintain procedures to provide for the broad dissemination of proposals and alternatives for public inspection; opportunities for written comments; public hearings after effective notice; open discussions; communication programs and information services; consideration of and response to public comments; and the notification of the public for the adoption, implementation and evaluation of the Comprehensive Plan.
- 11.2 Skagit County shall continue to encourage public awareness of the Comprehensive Plan by providing for public participation opportunities and public education programs designed to promote a widespread understanding of the Plan's purpose and intent.
- 11.3 For land use proposals, including those within the marine environment, all applicants shall bear the costs for public notification, by mail, and by posting of signs. Affected neighbors and surrounding shoreline owners shall be notified as prescribed by ordinance.
- 11.4 Skagit County shall provide regular and ongoing opportunities for public review and comment throughout the Comprehensive Plan development process.
- 11.5 Skagit County shall encourage citizen participation throughout the planning process as mandated by state statute and codes for environmental, land use, and development permits.
- 11.6 Skagit County shall utilize broad based Citizen Advisory Committees to participate and assist in the development of the Comprehensive Plan Elements, sub-area plans and functional plans.

12. Public Facilities and Services

Ensure that those public facilities and services necessary to support development shall be adequate to serve the development at the time the development is available for occupancy and use without decreasing current service levels below locally established minimum standards.

- 12.1 Public facilities and services shall be integrated and consistent with locally adopted comprehensive plans and implementing regulations.
- 12.2 All communities within a region shall fairly share the burden of regional public facilities. (The GMA defines regional public facilities as streets, roads, highways, sidewalks, street and road lighting systems, traffic signals, domestic water systems, storm and sanitary sewer systems, parks, recreational facilities and schools.)
- 12.3 A process shall be developed for identifying and siting essential public facilities. The Comprehensive Plan may not preclude the siting of essential public facilities. (The GMA defines essential public facilities as those facilities that are typically difficult to site, such as airports, state education facilities and state or regional transportation facilities, state and local corrections facilities, solid waste handling facilities, and in-patient facilities including substance abuse facilities, mental health facilities and group homes.)
- 12.4 Lands shall be identified for public purposes, such as: utility corridors, transportation corridors, landfill, sewage treatment facilities, recreation, schools, and other public uses. The County shall work with the state, cities, communities and utility providers to identify areas of shared need for public facilities.
- 12.5 Lands designated for urban growth by this Comprehensive Plan shall have an urban level of regional public facilities prior to or concurrent with development.
- 12.6 Development shall be allowed only when and where all public facilities are adequate, and only when and where such development can be adequately served by regional public services without reducing levels of service elsewhere.
- 12.7 Public facilities and services needed to support development shall be available concurrent with the impacts of development.
- 12.8 The financing for system improvements to public facilities to serve new development must provide for a balance between impact fees and other sources of public funds and cannot rely solely on impact fees.

- 12.9 New development shall pay for or provide for its share of new infrastructure through impact fees or as conditions of development through the environmental review process.
- 12.10 Public water supply for new development shall conform to or exceed the Coordinated Water System Plan for public water systems.
- 12.11 Future development of land adjacent to existing and proposed schools and other public facilities shall be compatible with such uses.
- 12.12 Library service within the county should be developed and coordinated to assure the delivery of comprehensive services throughout the County, with the county, cities and towns fairly sharing the burden.
- 12.13 A county-wide recycling program shall be developed.
- 12.14 Public drainage facilities shall be designed to control both stormwater quantity and quality impacts.
- 12.15 Skagit County shall provide results of the required six year capital facilities plan, including a financing plan, and these shall be consistent with land use designations.
- 12.16 Citizens shall have the opportunity to participate in and comment on proposed capital facilities financing.
- 12.17 The Washington State Boundary Review Board for Skagit County should be disbanded pursuant to RCW 36.93.230 provided that the following tasks are accomplished: (a) that ALL cities and the County have adopted comprehensive plans and development regulations consistent with the requirements of these Countywide Planning Policies and RCW 36.70A, including appropriate urban levels of service for all public facilities and services; (b) that ALL cities and the County have adopted a concurrency ordinance that requires the adopted urban levels of service addressed in (a) above be accomplished in time frames that are consistent with RCW 36.70A.; (c) that special purpose districts that serve UGAs have adopted urban levels of service standards appropriate for their service areas; (d) that ALL cities and the County have an adopted capital facility plan for urban levels of service that indicates sources of revenue and a timeline for meeting such service; and (e) that ALL cities and special purpose districts have in place adopted “interlocal agreements” that discuss arrangements for transfer of assets and obligations that may be affected by transference of governance or annexation of the service area consistent with the requirements of applicable RCWs.

13. Historic Preservation

Identify and encourage the preservation of lands, sites, and structures, that have historical or archaeological significance.

- 13.1 Skagit County shall cooperate with local historic preservation groups to ensure coordination of plans and policies by the State Office of Archeology and Historic Preservation.