CITY OF MILLWOOD

Comprehensive Plan & Development Regulations

Periodic Update 2026

Land Capacity Analysis Report

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INTRODUCTION

The City of Millwood is undertaking a periodic review of its Comprehensive Plan and applicable Development Regulations. As part of this Update, the Growth Management Act (GMA) and Countywide Planning Policies for Spokane County (CWPP), require local governments to complete a Land Capacity Analysis (LCA). This report meets the requirements for the Land Capacity Analysis Methodology For Spokane County, adopted in March 2024, which augments the Washington State Department of Commerce (DOC) Urban Growth Area Guidebook: Reviewing, Updating and Implementing Your Urban Growth Area - Chapter 5: Land Capacity Analysis and Buildable Lands Program for Urban Growth Areas.

Each jurisdiction within Spokane County, including the City of Millwood, was responsible for developing its own land quantity analysis report. The land quantity analysis reports from each jurisdiction are intended to provide quantitative information regarding the theoretical ability of existing urban areas to accommodate additional residential and nonresidential growth which in addition to other information, will be utilized by the Steering Committee of Elected Officials (SCEO), the Spokane County Board of County Commissioners (BOCC), each jurisdiction, and the public in the course of designating and adjusting Urban Growth Areas (UGAs).

The primary purpose of this land capacity analysis report was to analyze residential, commercial, and industrial growth capacity within the City of Millwood and includes the following information:

- Total number of existing platted lots in the City of Millwood.
- Total number of lots in approved preliminary plats in the City of Millwood broken down by year of approval and sunset date for the preliminary plat approval.
- Total number of approved, but un-built, multi-family units in the City of Millwood.
- Total areas of vacant commercial and industrial land in the City of Millwood, sorted according to parcel size ranges (less than .25 acre; .25 acre to 1 acre; 1 acre to 5 acres; 5 acres to 10 acres; etc.)
- Total acres of unplatted land available for development in the City of Millwood, sorted according to the City's existing zoning categories.
- Future capacity projections, based upon current City of Millwood zoning regulations.
- Listing of all assumptions made, list of participants (both governmental and non- governmental), and recommendations for wider public comment.

The City of Millwood zoning map and records of the Spokane County Assessor's Office were utilized as the base information for this report with information supplemented by other sources such as Google Earth and 'field' methods as appropriate. Information contained in this report was compiled from January through September 2024; however, parcel data is frequently updated so information may be subject to change. Several properties that are coded as 91 Vacant Land, have actually been classified as Underutilized or not included in Vacant because they contain uses such as parking for adjoining businesses or outdoor sales lots (i.e. Paul's All Wood Custom Sheds).

For more information about the City of Millwood Periodic Update, please contact:
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METHODOLOGY & ASSUMPTIONS

Spokane County adopted a revised Land Capacity Analysis (LCA) Methodology in March 2024 (included in Appendix A). The following are the primary methodology steps and assumptions utilized by the City of Millwood:

Step #1: Identify lands that are potential candidates to accommodate future growth, including vacant, partially used, and underutilized land.

1. Vacant Land - Initial identification of these lands includes any lot or parcel that does not contain improvement value exceeding $5000 in value, as determined from the Assessor's records. Regardless of improvement value, land containing a distinctive land use or clearly supporting other nearby uses should not be considered vacant. Parking lots, storage yards, and golf courses are some examples of such land which would not be considered vacant. This is initially determined using Property Class codes ending in *91 (e.g., 891 “land with adjoining use”), though identification by other means may be required. Additionally, some parcels may contain a significant part of a structure but have no improvement value because the assessor typically only assigns improvement value to one of multiple related parcels. Again, Assessor Property Codes can be used to identify these parcels and remove them from the “vacant land” inventory. Where a planned unit development (PUD) or preliminary plat has been adopted for a given area, jurisdictions may use the approval of those instruments to inform the capacity of those vacant areas. For example, if a PUD has been approved for 1,000 units, and only 750 units have been platted and constructed, the jurisdiction can consider the area to contain 250 units of additional capacity. Steps two through five below should not be applied to areas within PUDs and preliminary plats. Likewise, if a jurisdiction has adopted a sub area plan, specific plan, or study for a given area which provides for an estimated buildout scenario, that study or plan can be relied upon to determine the capacity of an area rather than steps two through four below.

2. Partially Used Land - Land in this category is occupied by a use which is consistent with zoning but contains enough land to be further subdivided without need of rezoning. Partially used residential land in urban areas includes those properties that can be subdivided into eight (8) or more lots, parcels, or tracts consistent with existing zoning standards. As an additional consideration, jurisdictions can subtract lands from this category that contain a very valuable home, as very valuable homes on large lots are not expected to subdivide or redevelop within the 20-year timeline. Accordingly, any partially used land with at least eight times more improvement value than land value can be removed from the available capacity. Commercial and industrial lands will not be calculated in this category.

2024 & 2025 values utilized.

3. Underutilized Land - These parcels include those zoned for more intensive use than that which currently occupies the property. For example, a single family home in a multi-family zoning district would fit within this category. If a parcel is classified as underutilized, it is not included in the partially used category as the capacity does not assume the existing use would remain if redeveloped. An existing residential use(s) on a commercial or industrial zoned parcel will be considered under-utilized and counted as such. A parcel in a commercial or industrial zone with an improvement value of four times the land value or less should also be reviewed further for the likelihood that it would redevelop as either

residential or commercial/industrial use. Each jurisdiction should then determine the likelihood that redevelopment of these parcels would include residential units or commercial/industrial uses and include them in their underutilized land accordingly. An improvement to land value ratio of 4 to 1 is considered "average" for normal uses by the Assessor. Accordingly, these parcels may not redevelop in the 20-year timeframe if the improvement value is high enough, even if the use is generally non-conforming. Likewise, an Assessor Property Class of 391 can be used to select for these properties and to review whether they should be included in the Underutilized category.

2024 & 2025 values utilized. 4x land to building value not utilized in UR-1 or UR-2 determinations due to inconsistent assessment values for comparable homes and the majority of homes in Millwood being in underutilized category based on this criterion. As homes are re-assessed in 2026-2027, building values will likely increase. UR-3 underutilized includes single family homes in the multi-family zone with a building value of less than 4x the land value.

4x land to building value not utilized for properties with a Millwood Historic District Overlay either (C-2 and UR-2 Zone determinations).

2 properties on Millwood Historic Register have been removed from available land in Step #1.

Inland Empire Paper (IEP) owned land has been removed from the available land due to IEP policy of retaining land for noise buffers and air sheds (6 parcels zoned I-2 & 6 parcels zoned UR-2 were removed in Step #1).

Union Pacific Railroad parcel that bisects the City of Millwood has been included under right-of-way (ROW).

Step #2: Subtract all parcels that the community defines as not developable because of physical limitations.

Lands consisting of designated critical areas or other physical constraints may, in some cases, be subtracted from the inventory due to the presence of certain features which makes them difficult or impossible to develop. Critical areas, such as wetlands or streams, are commonly constrained by policies and regulations prohibiting development in these areas. Accordingly, any lands containing these features should be subtracted from the lands identified in Step 1. Affected areas should include not just the boundary of a known critical area but also the associated buffer that may be required by local code or policy. If policies or regulations are such that development is completely prohibited, then the area would be subtracted from the available land supply. If development would be allowed with mitigating measures, then the land area or a portion of it should be counted as available. However, any exclusion should not imply that such land cannot be developed, but instead recognizes that the difficulties associated with doing so are enough to limit development potential. Areas that may be excluded to one degree or another from the available land supply include, but are not limited to:

- Critical areas (as defined in RCW 36.70A)
- Natural resource lands (as defined in RCW 36.70A)
- Steep slopes and other geohazards (according to locally adopted critical areas ordinances or other local delineation)

- Shoreline Jurisdictional Areas
- Water bodies, including designated wetlands and their buffers.

In any case, it is up to the individual jurisdiction to analyze and to justify in their report how the various policies or regulations impact the land capacity analysis, according to local regulations and data sources.

Per the adopted Millwood Shoreline Management Program (SMP), residential development is prohibited waterward of the OHWM and within native conservation areas, as defined for the SRE designation. Parcels with a shoreline residential designation that have approx. 70% or more of the lot within the OHWM or native conservation areas / shoreline buffer, have been removed from the underutilized land category (per Step #2 of LCA methodology) - 1 parcel removed (45064.0023), parcel 45064.0026 approx. 60%.

Step #3: Subtract lands which will be needed for other public purposes.

This includes utility corridors, landfills, sewage treatment plants, recreation, schools, and other public uses (GMA, Section 15, RCW 36.70A. l50). Areas in this category include both public and private properties which are either currently owned and operated or those which will be needed to meet future needs in developing areas. Common owners of these lands, for example, may include utility companies, school districts, parks departments, or railroads to name a few. Likewise, the type of property tax exemption applied to these properties can be used to make an initial selection of these lands. In any case though, any lands removed from the capacity for Step 3 should consider that the predominate existing or planned use of the land is such that it would not reasonably be considered as available for any type of residential, commercial, or industrial development. Sample areas to be removed from available capacity include, but are not limited to:

1. Roads or rights-of-way (ROWs) - this category includes lands which will be needed for circulation facilities as relatively undeveloped areas begin to develop. Existing ROWs should be removed, but also a percentage of acres of land capacity should be subtracted from the overall capacity to account for internal circulation and other circulation needs. The actual percentage subtracted should be determined based upon development trends unique to the individual jurisdiction. Those assumptions then need to be documented in the individual jurisdictions' report.
2. School sites - this includes both existing sites and those additional needs which will be generated by growth in development areas.
3. Park sites - this includes both existing sites and those additional needs which will be generated by growth in developing areas. When available, the local jurisdiction’s level of service for parks provision should be used to estimate the amount to be removed.
4. Utility substations, corridors, and other facilities - this category includes both existing and anticipated sites and corridors which would preclude residential, commercial, or industrial development.
5. Other public lands - any other public need which is known to the local jurisdiction.

Right-of-way (ROW) and railroad line parcels have been excluded from this LCA. Per LCA Step #3, additional ROW land is not needed based on current development trends for Millwood.

Step #4: Subtract ..."that percentage of land"... which you assume will not be available for development within your plan's 20-year timeframe.

Assume that a certain percent of vacant, under-utilized, and partially-used lands will always be held out from development. This factor takes into consideration the fact that not all available lands will actually become available for development in the next 20 years. This could be due to a variety of personal and economic reasons. Applied universally to all capacity areas, it is safe to assume a percentage of all vacant, partially used, or underutilized land will simply not develop within the 20-year timeframe. This percentage that is taken out of capacity for various unknown economic and social reasons is known as the market factor. There is insufficient data available locally, regionally, or on a state level to determine an exact market factor to apply—there are simply too many variables at play to determine the market factor with any certainty. Therefore, jurisdictions in the County assume that approximately 30 percent of the total available land will not be available for development during the next 20 years.

Step# 5: Determine total capacity.

After determining desirable densities and land uses for various areas within your jurisdiction (i.e., vacant, partially used, and underutilized), multiply the number of acres in remaining parcels by the number of units per acre allowed in the area where the parcel is located. Add together to determine total capacity of vacant, underutilized, and partially-used lands. The sorting of the available land supply according to the generalized existing zoning categories of residential, commercial, and industrial is key to determining total land capacity. The land quantity analysis and report will estimate that future land capacity given existing zoning. To do this, historic development data along with other information sources available to each jurisdiction should be used to determine an assumed development capacity by zone for all capacity lands. Assumptions should be provided for the number of dwelling units per acre expected in various zones as well as the resulting number of people per unit expected in those areas. Secondary information sources, such as the US Census and Office of Financial Management data can be used to inform the population assumptions in this step. Separate calculations can be applied to vacant, underutilized, and partially used portions of each jurisdictions' capacity, provided the assumptions behind those are clearly documented.

Per the US Census Bureau 2022 American Community Survey (ACS), Millwood has an average of 2.44 persons per household (3.04 persons per family). This has increased from the data utilized in the previously adopted City Comprehensive Plan (2.28 persons per household based on 2017 ACS).

Based on bulk density standards under Table 15 in the adopted City Comprehensive Plan, the following were the factored units per sq. ft. based on the zone. Lot coverage and allowed uses were also factored consistent with RCW 36.70A.115 (comprehensive plans and development regulations must provide sufficient land capacity for development) and WAC 365-196-325 (providing sufficient land capacity suitable for development).

Table 15 Bulk Density Standards

Bulk Standards	UR-1	UR-2	UR-3
Maximum density	2 units per 10,000 sq. ft.	1 Unit per 5,000 sq. ft. or 2 units per 7,200 sq. ft	2,500 sq. ft. per dwelling unit

Additional mixed use and residential development can also be accommodated in the C-2 and C-1 zones based on current development regulations, but likely at a smaller household/family size.

Additionally, the western portion of Millwood has an ACZ-5 Overlay for Felts Field. An analysis was performed based on Millwood Municipal Code (MMC) Section 17.38.005 - General provisions - K. Airport Compatibility and Millwood has plenty of remaining capacity to accommodate growth in the affected zones.

Step# 6: Compare the population and unit capacity estimated by this process against the adopted population forecast and housing allocation forecast for each jurisdiction.

Once the capacity in both units and population is generated, it should be compared to the population growth forecast for each jurisdiction as well as the housing allocation required by House Bill 1220. By comparing population and unit capacity against the forecast allocation set by the Steering Committee of Elected Officials and ultimate the Board of County Commissioners, jurisdictions can determine what steps are required by the State to comply (i.e., annexation, UGA modifications, regulation amendments).

Spokane County Population Allocation (Millwood is 0.05% or 49 persons by 2046) with a housing allocation of up to 106 units (Berk Method A Prime – November 2024). HAPT needs to use each jurisdiction's/area's share of housing growth as input vs. their share of population growth to accurately apportion housing unit income targets to each jurisdiction/area.

BUILDING INTENSITIES BY ZONE

The City of Millwood has 829 total parcels, excluding right-of-way (ROW). This is an increase of only two (2) parcels since the last Comprehensive Plan update. The following table further breaks down this information by each zoning category (based on the July 2022 Official City Zoning Map) for parcels, acres, and percent of the total.

Zoning Category	# of Parcels	Acres	Percent
Residential (UR-1)	85	46.98	10.5%
Residential (UR-2)	575	162.79	36.3%
Residential (UR-3)	42	12.44	2.8%
General Commercial (C-1)	49	38.24	8.5%
Low-Intensity Commercial / Mixed Use (C-2)	53	13.06	2.9%
Light Industrial (I-1)	5	5.65	1.3%

Industrial / Manufacturing (Paper Mill Alternative I-2)	6	53.29	11.9%
Public Reserve (P-1)	14	27.10	6.0%
Zoning Total	**829**	**359.55**	**80.3%**
Right-of-Way & Railroad Parcel (10.66 Acres)	N/A	88.45	19.7%
City Total *(0.7 Square Miles in City Boundary)*	**829**	**448**	**100%**

There are no currently approved preliminary plats that have not been finalized, nor any approved but un-built, multi-family units in the City of Millwood. In the UR-1 Zone, Magnolia Village was approved in April 2024 for 17 units (manufactured home park) on two (2) parcels, one that is vacant and one that currently contains a single-family home; however, no action has yet been taken to finalize or begin construction on the project.

BUILDABLE LANDS ANALYSIS

Based on the methodologies and assumptions above, the following sections analyze the unplatted land, residential land, commercial / industrial land, and public reserve land capacity in the City of Millwood.

Unplatted Land

The vast majority of land within the City of Millwood has been platted with subdivisions dating back to the early 1900's. Inland Empire Paper Company (IEP) owns a large area of unplatted land with one parcel that has large vacant pieces totaling approximately seven (7) acres in the northeast portion of the City; however, in the foreseeable future, IEP has no plans of leaving Millwood or selling off portions of the land. Should land become available, this would open up unplatted land within the city boundary and allow for new growth within the current industrial / manufacturing (Paper Mill Alternative) I-2 zone that would be re-zoned per City Code. The UR-2 Zone also has several unplatted parcels; however, they all contain residential uses with only one (1) parcel classified as underutilized residential. The UR-3 Zone has two (2) unplatted and underutilized residential parcels. The following table represents the unplatted land available in the City of Millwood.

Zoning Category	Unplatted Parcels	Unplatted Acres	Land Status	Available for Development
Residential (UR-1)	None	None	N/A	N/A
Residential (UR-2)	87	25.51	All parcels are Utilized Residential except: • 1 Parcel - 2 acres in size is Underutilized Residential • 1 Parcel - 0.04 acres in size (non-conforming lot) is Vacant Residential	No / Not Currently

Zoning Category	Unplatted Parcels	Unplatted Acres	Land Status	Available for Development
Residential (UR-3)	3	0.96	• 1 Parcel - 0.28 acres in size is Utilized Residential • 2 Parcels - 0.34 acres each are Underutilized Residential	No / Not Currently
General Commercial (C-1)	2	8.45	• 1 Parcel - 3.92 acres in size is Utilized Commercial • 1 Parcel - 4.53 acres in size is Utilized Commercial	No
Low-Intensity Commercial / Mixed Use (C-2)	1	0.55	Utilized Commercial	No
Light Industrial (I-1)	None	None	N/A	N/A
Industrial / Manufacturing (Paper Mill Alternative I-2)	2	37.39	• 1 Parcel - 35.83 acres in size is Utilized Industrial • 1 Parcel - 1.56 acres in size is Utilized Industrial	No - IEP
Public Reserve (P-1)	11	16.40	Public Reserve	No
Zoning Total	**106**	**89.26**	• **Only 4 Unplatted Parcels totaling 2.72 acres are Vacant or Underutilized Residential** • **There are no Unplatted Parcels that are Underutilized or Vacant Commercial / Industrial**	**None are currently available**

Residential Land Analysis

Zoning Category	Vacant Residential Acreage	Partially Used Residential Acreage	Underutilized Residential Acreage	Utilized Residential Acreage	Total Acreage	Total Sq. Ft.
Residential (UR-1)	2.32	0	1.65	43.01	46.98	2,047,825.45

Residential (UR-2)	0.94	0	2.00	159.85	162.79	7,082,862.44
Residential (UR-3)	0.26	0	6.62	5.56	12.44	541,970.52
Zoning Total	**3.52**	**0**	**10.27**	**208.42**	**222.21**	**9,672,658.41**

Commercial and Industrial Land Analysis

Zoning Category	Vacant Commercial / Industrial Acreage	Underutilized Commercial / Industrial Acreage	Utilized Commercial / Industrial Acreage	Total Acreage	Total Sq. Ft.
General Commercial (C-1)*	0.44	4.63	33.17	38.24	1,665,528.76
Low-Intensity Commercial / Mixed Use (C-2)*	0.40	4.42	8.24	13.06	567,973.40
Light Industrial (I-1)	0.71	1.62	3.32	5.65	245,805.00
Industrial / Manufacturing (Paper Mill Alternative I-2)	0	0	53.29	53.29	2,321,447.95
Zoning Total	**1.55**	**10.67**	**98.02**	**110.24**	**4,800,755.11**

***** Additional mixed use and residential can also be accommodated in the C-2 and C-1 zones based on current development regulations.

Zoning Category	Total Vacant Commercial / Industrial Acreage	Parcels less than 0.25 acres	Parcels 0.25 acre - 0.50 acres	Parcels 0.51 acres - 1 acre	Parcels greater than 1 acre
General Commercial (C-1)*	0.44	0	1	0	0
Low-Intensity Commercial / Mixed Use (C-2)*	0.40	3	0	0	0
Light Industrial (I-1)	0.71	0	0	1	0
Industrial / Manufacturing (Paper Mill Alternative I-2)	0	0	0	0	0
Zoning Total	**1.55**	**3**	**1**	**1**	**0**

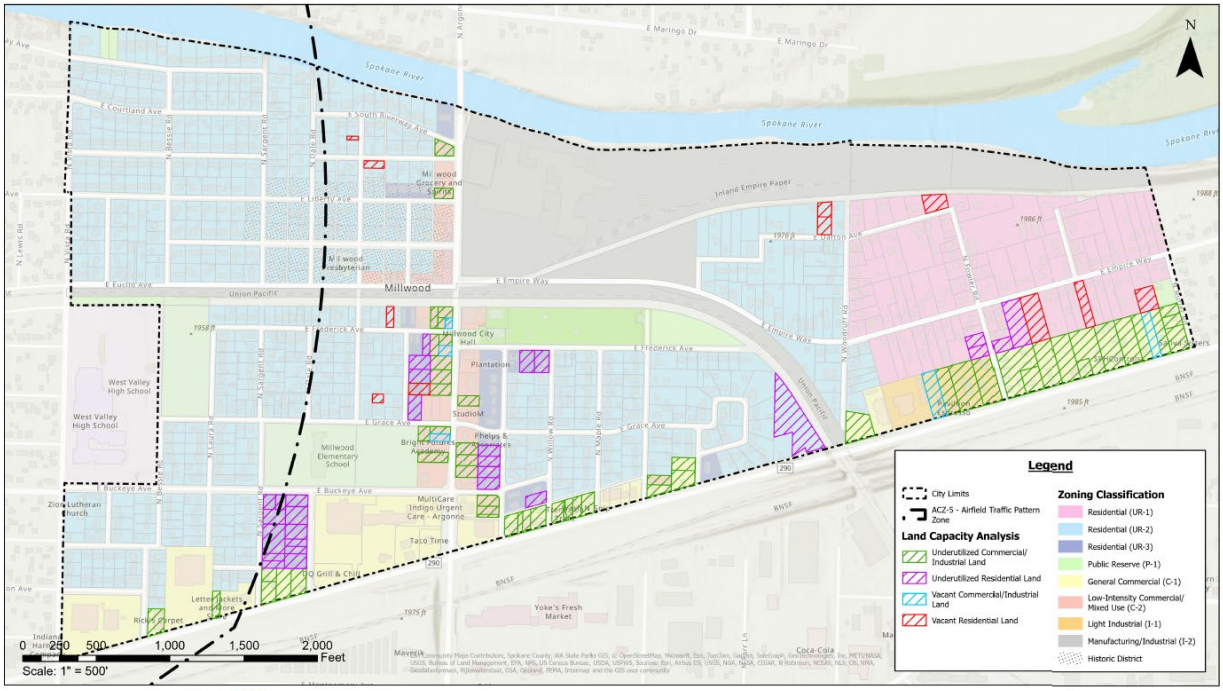
***** Additional mixed use and residential can also be accommodated in the C-2 and C-1 zones based on current development regulations.

Public Reserve Land Analysis

Zoning Category	Parcel Class Code	Acreage	Sq. Ft.	Ownership - Use
Public Reserve (P-1)	91 Vacant Land	0.26	11,325.60	City of Millwood - Future Riverfront Park
	91 Vacant Land	0.25	10,890.00	City of Millwood - Future Riverfront Park
	91 Vacant Land	0.87	37,768.00	Spokane County - Abandoned Burlington Northern Railroad R/W Branch Line 60ft Wide (Interurban Trail)
	91 Vacant Land	0.42	18,092.00	Spokane County - Abandoned Burlington Northern Railroad R/W Branch Line 60ft Wide (interurban Trail)
	67 Service - Governmental	5.19	226,072.00	City of Millwood - Millwood Park & New Park Water Well
	67 Service - Governmental	0.40	17,327.00	City of Millwood - Water Tower, Old Park Water Well, and Eastern Portion Of Millwood Park w/ Locust Rd. ROW
	67 Service - Governmental	0.49	21,232.00	City of Millwood - Public Works
	67 Service - Governmental	0.51	22,400.00	City of Millwood - Butler Water Well & Storage Shop
	67 Service - Governmental	0.41	17,710.00	City of Millwood - City Hall
	67 Service - Governmental	0.32	14,068.00	City of Millwood - Millwood Fire Station
	68 Service - Education	5.38	234,494.00	West Valley School District - West Valley High School Ballfields
	68 Service - Education	6.10	265,686.00	West Valley School District - Millwood Elementary School / Kindergarten Center
	69 Service - Education	4.09	178,067.00	West Valley School District - Millwood Elementary School / Kindergarten Center Ballfields
	48 Utilities	2.41	105,000.00	Avista Corporation - Power Plant
Zoning Total		**27.10**	**1,180,131.60**	

Land Capacity Analysis Map by Zone

The following map identifies the vacant and underutilized properties by zone, prior to completion of the capacity analysis Steps #4 - #6.



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City of Millwood
Land Capacity Analysis - Underutilized Properties

Sources:
ESRI Basemaps
Spokane County GIS
City of Millwood

PROJECT NO..... 51007.00
DRAWN BY..... CSH
FILENAME..... LCA-ZoningMap
DATE..... 10-24-2024

Future Capacity Projections

Based on the analysis above and current zoning regulations, the following are future capacity projections for the City of Millwood.

Commercial / Industrial Capacity

An employee per acre (EPA) calculation has not been established for the City of Millwood. The City of Cheney utilized the *Oregon Department of Land Conservation and Development (DLCD)'s Industrial and Other Employment Lands Analysis: Basic Guidebook (2005)* for their LCA. This guidebook advocates for EPAs of 7-12 for heavy industrial uses, 10-15 for light industrial uses, and 12-20 for commercial uses. For consistency within Spokane County, this is the resource that has been utilized for Millwood's Commercial / Industrial Lands.

C-1 Zone	**Vacant Commercial / Industrial**	**Underutilized Commercial / Industrial**
General Commercial (C-1) Parcels	1 Parcel	32 Parcels
General Commercial (C-1) Acreage	0.44 Acres	4.63 Acres
30% Market Factor Reduction (LCA Step #4)	0.13 Acres	1.39 Acres
C-1 Zone - Available Land After 30% Market Factor Reduction*	**0.31 Acres**	**3.24 Acres**
Maximum Building / Site Coverage	75%	75%
Remaining Available Land	**0.23 Acres**	**2.43 Acres**
C-1 Zone Land Capacity - EPA Calculation (LCA Step #5)	**Vacant Commercial / Industrial**	**Underutilized Commercial / Industrial**
12-20 EPA for commercial uses	2.76 - 4.60 Additional Employees	29.16 - 48.60 Additional Employees
***** Additional residential units on parcels without a commercial use or with mixed use can also be accommodated in the C-1 zone based on current development regulations.		

C-2 Zone	**Vacant Commercial / Industrial**	**Underutilized Commercial / Industrial**
Low-Intensity Commercial / Mixed Use (C-2) Parcels	3 Parcels	21 Parcels
Low-Intensity Commercial / Mixed Use (C-2) Acreage	0.40 Acres	4.42 Acres
30% Market Factor Reduction (LCA Step #4)	0.12 Acres	1.33 Acres
C-2 Zone - Available Land After 30% Market Factor Reduction*	**0.28 Acres**	**3.09 Acres**
Maximum Building / Site Coverage	50% (85% w/ mixed use)	50% (85% w/ mixed use)
Remaining Available Land	**0.14 Acres (0.24 w/ mixed use)**	**1.55 Acres (2.63 w/ mixed use)**
C-2 Zone Land Capacity - EPA Calculation (LCA Step #5)	**Vacant Commercial / Industrial**	**Underutilized Commercial / Industrial**
12-20 for commercial uses	1.68 - 4.80 Additional Employees	18.60 - 52.60 Additional Employees
* Additional residential units can also be accommodated in the C-2 zone through mixed use based on current development regulations.		

I-1 Zone	Vacant Commercial / Industrial	Underutilized Commercial / Industrial
Light Industrial (I-1) Parcels	1 Parcel	3 Parcels
Light Industrial (I-1) Acreage	0.71 Acres	1.62 Acres
30% Market Factor Reduction (LCA Step #4)	0.21 Acres	0.49 Acres
I-1 Zone - Available Land After 30% Market Factor Reduction	**0.50 Acres**	**1.13 Acres**
Maximum Building / Site Coverage	75%	75%
Remaining Available Land	**0.38 Acres**	**0.85 Acres**
I-1 Zone Land Capacity - EPA Calculation (LCA Step #5)	**Vacant Commercial / Industrial**	**Underutilized Commercial / Industrial**
10-15 for light industrial uses	3.80 - 5.70 Additional Employees	8.50 - 12.75 Additional Employees

I-2 Zone	Vacant Commercial / Industrial	Underutilized Commercial / Industrial
Industrial / Manufacturing (Paper Mill Alternative I-2) Parcels	0	0
Industrial / Manufacturing (Paper Mill Alternative I-2) Acreage	0	0
30% Market Factor Reduction (LCA Step #4)	0	0
I-2 Zone - Available Land After 30% Market Factor Reduction	**0**	**0**
I-2 Zone Land Capacity - EPA Calculation (LCA Step #5)	**Vacant Commercial / Industrial**	**Underutilized Commercial / Industrial**
7-12 for heavy industrial uses	0 Additional Employees	0 Additional Employees

Residential Capacity

Per the Millwood Municipal Code (MMC), legal nonconforming lots shall be considered a buildable lot even though such lots fail to meet the requirements for frontage width or lot area that are generally applicable in the zone, provided that yard setbacks and requirements other than frontage width or lot area shall conform to the regulations for the zone in which such lot is located. Legal non-conforming lots, including secondary lots with access likely via a driveway easement, have been included for future projections. Per the US Census Bureau 2022 American Community Survey (ACS), Millwood has an average of 2.44 persons per household.

UR-1 Zone	**Vacant Residential**	**Underutilized Residential**
Residential (UR-1) Parcels	4 Parcels	4 Parcels
Residential (UR-1) Acreage	2.32 Acres	1.65 Acres
30% Market Factor Reduction (LCA Step #4)	0.70 Acres	0.50 Acres
UR-1 Zone - Available Land After 30% Market Factor Reduction	**1.62 Acres**	**1.16 Acres**
Maximum Building / Site Coverage	40%	40%
Remaining Available Land	**0.65 Acres**	**0.46 Acres**
UR- 1 Zone Land Capacity - Current # of units w/ current zoning (LCA Step #5)	**Vacant Residential (Current Zoning)**	**Underutilized Residential (Current Zoning)**
2 Dwelling Unit per 10,000 Sq. Ft.*	5.66 Units	4.00 Units
UR- 1 Zone Land Capacity - Proposed # of units w/ proposed zoning (LCA Step #5)	**Vacant Residential (Proposed Zoning)**	**Underutilized Residential (Proposed Zoning)**
1 Dwelling Unit per 5,000 Sq. Ft. *(At Least 2 or 3 units permitted per lot)*	5.66 Units	4.00 Units
Estimated Additional Population	**Vacant Residential**	**Underutilized Residential**
2.44 persons per household	13.81 People	9.76 People
* Multi-Family (3 or more units) currently requires a Conditional Use Permit (CUP) in UR-1 Zone. Single Family and Duplex (2 Units) are currently Permitted (P) uses in UR-1 Zone.		

UR-2 Zone	**Vacant Residential**	**Underutilized Residential**
Residential (UR-2) Parcels	6 Parcels	1 Parcel
Residential (UR-2) Acreage	0.94 Acres	2.00 Acres
30% Market Factor Reduction (LCA Step #4)	0.28 Acres	0.60 Acres
UR-2 Zone - Available Land After 30% Market Factor Reduction	**0.66 Acres**	**1.40 Acres**
Maximum Building / Site Coverage	40%	40%
Remaining Available Land	**0.26 Acres**	**0.56 Acres**
UR- 2 Zone Land Capacity - Current # of units w/ current zoning (LCA Step #5)	**Vacant Residential (Current Zoning)**	**Underutilized Residential (Current Zoning)**
1 Dwelling Unit per 5,000 Sq. Ft.	*2.27 Units*	*4.88 Units*
2 Dwelling Unit per 7,200 Sq. Ft.	*3.15 Units*	*6.78 Units*
UR- 2 Zone Land Capacity - Proposed # of units w/ proposed zoning (LCA Step #5)	**Vacant Residential (Proposed Zoning)**	**Underutilized Residential (Proposed Zoning)**

1 Dwelling Unit per 3,600 Sq. Ft. *(At Least 2 or 3 units permitted per lot)*	3.15 Units	6.78 Units
Estimated Additional Population	**Vacant Residential**	**Underutilized Residential**
2.44 persons per household	7.69 People	16.54 People
Multi-Family (3 or more units) is currently Not Allowed in UR-2 Zone. Single Family and Duplex (2 Units) are currently Permitted (P) uses in UR-2 Zone.		

UR-3 Zone	**Vacant Residential**	**Underutilized Residential**
Residential (UR-3) Parcels	1 Parcel	23 Parcels
Residential (UR-3) Acreage	0.26 Acres	6.62 Acres
30% Market Factor Reduction (LCA Step #4)	0.08	1.99
UR-3 Zone - Available Land After 30% Market Factor Reduction	**0.18 Acres**	**4.63 Acres**
Maximum Building / Site Coverage	40%	40%
Remaining Available Land	**0.07 Acres**	**1.85 Acres**
UR- 3 Zone Land Capacity - Current # of units w/ current zoning (LCA Step #5)	**Vacant Residential (Current Zoning)**	**Underutilized Residential (Current Zoning)**
1 Dwelling Unit per 2,500 Sq. Ft.	1.22 Units	32.23 Units
UR- 3 Zone Land Capacity - Proposed # of units w/ proposed zoning (LCA Step #5)	**Vacant Residential (Proposed Zoning)**	**Underutilized Residential (Proposed Zoning)**
1 Dwelling Unit per 2,500 Sq. Ft. *(2 or more units permitted per lot)*	1.22 Units	32.23 Units
Estimated Additional Population	**Vacant Residential**	**Underutilized Residential**
2.44 persons per household	2.98 People	78.64 People
Single Family, Duplex (2 Units), and Multi-Family (3 or more units) are currently Permitted (P) uses in UR-3 Zone.		

Comparison (Step #6) and Conclusions

Zoning Category	Vacant & Underutilized Remaining Available Land	Total Dwelling Unit Capacity (Vacant & Underutilized Land)	Estimated Additional Population
Industrial (I-1 & I-2)	1.23 Acres	N/A	12.30 - 18.45 Employees
Commercial (C-1* & C-2**)	4.35 - 5.53 Acres	Varies	52.20 - 110.60 Employees
Residential (UR-1, UR-2, & UR-3)	3.85 Acres	53.04	129.42 People
* Additional residential units on parcels without a commercial use or with mixed use can also be accommodated in the C-1 zone based on current development regulations, but likely at a smaller household/family size.			
** Additional residential units can also be accommodated in the C-2 zone through mixed use based on current development regulations, but likely at a smaller household/family size. Example: C-2 has an 85% mixed use lot coverage with the opportunity for shared parking and 2.87 acres (125,017 sq. feet) of remaining available land. Using a typical three-story (3 story), 10,950 sq. ft mixed use building that encompasses a footprint of 3,650 sq. ft (0.08 acres) with at least 25% of the building or one floor being devoted to residential and units sized at approximately 750 sq. ft. each, the building could accommodate 4 units. Based on this example building, if 15% of the available land (18,752 sq. ft.) was utilized for mixed use, the land could accommodate an additional 20 units.			
Housing Allocation (per HAPT for Spokane County)	**As of November 2024, Millwood needs to plan for up to 106 additional housing units (dependent on share of housing % allocated to the City of Millwood) with housing units allocated across income bands as well as 2 - 5 temporary emergency housing units.**		

Total population and housing allocation can be accommodated within Millwood's Urban Growth Area (UGA) which is the City boundary, under current zoning designations utilizing infill development; however, code amendments will be required to comply with state legislation for Accessory Dwelling Units (ADU) and the Housing for All Planning Tool (HAPT) for allocated housing units across income bands and number of units.

Potential methods to accommodate additional units *(in addition to or in cooperation with code amendments that will be required to comply with state legislation for Accessory Dwelling Units (ADU) and the Housing for All Planning Tool (HAPT) for housing units allocated across income bands)*:

- Additional missing middle housing types as permitted uses
- Lot coverage reductions
- Setback reductions / zero lot line option
- Lot width reductions
- Lot area reductions or removal of minimum / maximum lot sizes (form based)
- Private driveways to serve up to 3 lots (up to 6 units – i.e. duplexes or additional for triplex, fourplex, multi-family, etc. – research other jurisdictions' standards)
- Increase mixed use/residential in Low-Intensity Commercial/Mixed Use (C-2) Zone

PUBLIC PARTICIPATION

This Land Capacity Analysis (LCA) Report was posted on the City of Millwood's Periodic Update webpage for public and agency review (https://www.millwoodwa.us/periodic-updates) with advertisement via social media, email, etc., as outlined in the City of Millwood's Periodic Update 2026 Public Participation Plan. The LCA Report was also presented to the Millwood Planning Commission and City Council on December 10, 2024 with an opportunity to receive feedback.

APPENDIX

- 2024 Spokane County Land Capacity Analysis Methodology

LAND CAPACITY ANALYSIS METHODOLOGY FOR SPOKANE COUNTY

INTRODUCTION

The adopted Countywide Planning Policies (CPPs) for Spokane County indicate that the land capacity analysis method developed by the Washington State Department of Commerce (Commerce) should form the basis of local efforts. The *Urban Growth Area Guidebook: Reviewing, Updating, and Implementing Your Urban Growth Area*[1]*- Chapter 5: Land Capacity Analysis and Buildable Lands Program for Urban Growth Areas* delineates a step-by-step process for determining the supply of land that may be considered available for growth.

The following document - Land Capacity Analysis Methodology for Spokane County is intended to augment that Commerce process by addressing specific local circumstances.

The following steps will apply to the land capacity analysis process to be conducted by each jurisdiction in Spokane County.

INFORMATION SOURCES FOR THE LAND CAPACITY ANALYSIS

The Spokane County Assessor's Office records will be utilized as the official base information for each jurisdiction's land capacity analysis. That information may be augmented by other sources or 'field' methods. In addition, the official zoning and land use files for each town, city, and Spokane County will be utilized.

THE LAND CAPACITY ANALYSIS REPORTS AND FORMAT

Each jurisdiction will be responsible for developing its land capacity analysis report. The land capacity analysis reports from each jurisdiction are intended to provide quantitative information regarding the theoretical ability of existing urban areas to accommodate additional residential and non-residential growth. This information will be helpful to the Steering Committee of Elected Officials (SCEO), the Spokane County Board of County Commissioners (BOCC), each jurisdiction, and the public while designating and adjusting Urban Growth Areas (UGAs). It is recognized that the information in the report must be integrated with and augmented by other data from various Technical Committees and each jurisdiction for UGA boundaries to be proposed and designated. Land capacity is one of several factors that must be analyzed to develop UGA proposals adequately.

The primary purpose of the land capacity analysis reports will be to analyze residential, commercial, and industrial growth capacity within existing city limits and urbanized unincorporated areas. The report will also estimate growth capacity within rural regions in unincorporated Spokane County.

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[1] https://www.commerce.wa.gov/serving-communities/growth-management/guidebooks-and-resources/

At a minimum, the following information will be included in the reports:

- Total number of existing platted lots in cities, towns, and urbanized county areas
- The total number of lots in approved preliminary plats in cities, towns, and urbanized county areas is broken down by year of approval and sunset date for the preliminary plat approval.
- Total number of approved but un-built multi-family units in cities, towns, and urbanized county areas.
- Total vacant commercial and industrial land areas, sorted according to parcel size ranges (less than .25 acre; .25 acre to 1 acre; 1 acre to 5 acres; 5 acres to 10 acres; etc.)
- Total acres of unplatted land available for development, sorted according to generalized existing zoning categories.
- Future capacity projections based on current zoning regulations for each jurisdiction.

The reports will also contain a complete list of all assumptions made, a list of participants (governmental and non-governmental), and provisions or recommendations for wider public comment.

SEPA INTEGRATION

The reports will serve as a portion of the overall State Environmental Policy Act (SEPA) analysis for establishing UGAs. The process should also provide an opportunity for public comment. Concerns should be appropriately noted and incorporated into the final product.

TECHNICAL COMMITTEE REVIEW AND COMPILING OF REPORTS

Once the individual land capacity and analysis reports for each jurisdiction are complete, the Land Capacity Technical Committee will review the analysis for consistency with the methodology and unique local conditions that may influence the analysis. Adjustments in the method or analysis may be appropriate if those reviews indicate that a deviation from the methodology's assumptions is warranted. A final land capacity report, essentially a compilation or summary of each jurisdiction's report, will be forwarded to the Steering Committee of Elected Officials for use.

The Land Capacity Technical Committee may find it helpful to coordinate their review and information with other technical committees working toward a regional carrying capacity analysis.

WHERE LAND CAPACITY INVENTORIES WILL OCCUR

1. Each incorporated town and city shall conduct a land capacity analysis within its corporate limits. Small cities and towns may rely on Spokane County to analyze land capacity.

2. Each city and town may conduct a land capacity analysis within any adjacent unincorporated areas under study for potential inclusions within its UGA. An agreement with Spokane County should be made regarding the process for conducting such an analysis.

3. Spokane County shall conduct a land capacity analysis in urbanizing unincorporated areas. The primary focus of that study will generally be the UGA as delineated in the existing Land Use Element of the Comprehensive Plan for Spokane County. Additional areas, as appropriate, may be included in the land capacity analysis.

4. Spokane County shall analyze its rural growth capacity by counting the number of vacant lots or acreage, partially-used parcels, and under-utilized land, exclusive of designated natural resource lands.

5. The Jurisdictions, as appropriate, shall cooperate in any land capacity analysis that involves geographic areas under study by two or more jurisdictions as potential UGAs. Formal written agreements should be enacted between the affected jurisdictions. Those agreements will automatically become a supplement to the reports.

PRIMARY METHODOLOGY STEPS

Step #1:
Identify lands that are potential candidates to accommodate future growth, including vacant, partially used, and underutilized land.

The Commerce guidelines define three general types of land that form the supply for eventual growth: vacant land, partially used land, and underutilized land. The definition of these terms has been modified below to fit local conditions.

All lands will be counted and sorted according to the number of lots or acreage (as appropriate) and existing generalized zone classification.

Vacant Land- Initial identification of these lands includes any lot or parcel that does not contain an improvement value exceeding $5000 in value, as determined from the Assessor's records.

Regardless of improvement value, land containing a distinctive land use or supporting other nearby uses should not be considered vacant. Parking lots, storage yards, and golf courses are examples of such land that would not be considered vacant. This is initially determined using

Property Class codes ending in *91 (e.g., 891 "land with adjoining use"), though identification by other means may be required.

Additionally, some parcels may contain a significant part of a structure but have no improvement value because the assessor typically only assigns improvement value to one of multiple related parcels. Again, Assessor Property Codes can be used to identify these parcels and remove them from the "vacant land" inventory.

Where a planned unit development (PUD) or preliminary plat has been adopted for a given area, jurisdictions may use the approval of those instruments to inform the capacity of those vacant areas. For example, if a PUD has been approved for 1,000 units, and only 750 units have been platted and constructed, the jurisdiction can consider the area to contain 250 units of additional capacity. Steps two through five below should not be applied to areas within PUDs and preliminary plats.

Likewise, suppose a jurisdiction has adopted a sub-area plan, specific plan, or study for a given area that provides for an estimated buildout scenario. In that case, that study or plan can be relied upon to determine the capacity of an area rather than steps two through four below.

Partially Used Land- Land in this category is occupied by use consistent with zoning but contains enough land to be further subdivided without rezoning. Accordingly, any parcel in rural areas containing at least two times the minimum lot size required by the applicable zone district could be considered partially used.

Partially used residential land in urban areas includes those properties that can be subdivided into eight (8) or more lots, parcels, or tracts consistent with existing zoning standards.

As an additional consideration, jurisdictions can subtract lands from this category that contain a valuable home, as high-value homes on large lots are not expected to be subdivided or redeveloped within the 20-year timeline. Accordingly, any partially used land with at least eight times more improvement value than land value can be removed from the available capacity.

Commercial and industrial lands will not be calculated in this category.

Underutilized Land- These parcels are zoned for more intensive use than currently occupying the property. For example, a single-family home in a multi-family zoning district would fit this category. If a parcel is classified as underutilized, it is not included in the partially used category as the capacity does not assume the existing use would remain if redeveloped.

An existing residential use(s) on a commercial or industrial-zoned parcel will be considered underutilized and counted as such. A parcel in a commercial or industrial zone with an improvement-value of four times the land value or less should also be reviewed further for the likelihood that it would be redeveloped for residential or commercial/industrial use. Each jurisdiction should then determine the likelihood that redevelopment of these parcels would

include residential units or commercial/industrial uses and include them in their underutilized land accordingly.

The Assessor considers an improvement-to-land value ratio of 4 to 1 "average" for typical uses. Accordingly, these parcels may not be redeveloped in the 20-year timeframe if the improvement value is high enough, even if the use is generally non-conforming. Likewise, an Assessor Property Class of 391 can be used to select these properties and to review whether they should be included in the Underutilized category.

Step #2:
Subtract all parcels the community defines as not developable because of physical limitations.

Lands consisting of designated critical areas or other physical constraints may, in some cases, be subtracted from the inventory due to certain features making them difficult or impossible to develop. Critical areas, such as wetlands or streams, are commonly constrained by policies and regulations prohibiting development in these areas. Accordingly, any lands containing these features should be subtracted from those identified in Step 1. Affected areas should include the boundary of a known critical area and the associated buffer that may be required by local code or policy.

If policies or regulations are such that development is wholly prohibited, then the area would be subtracted from the available land supply. If development would be allowed with mitigating measures, then the land area or a portion of it should be counted as available. However, any exclusion should not imply that such land cannot be developed but instead recognizes that the difficulties associated with doing so are enough to limit development potential.

Areas that may be excluded to one degree or another from the available land supply include, but are not limited to:

- Critical areas (as defined in RCW 36.70A)
- Natural resource lands (as defined in RCW 36.70A)
- Steep slopes and other geohazards (according to locally adopted critical areas ordinances or other local delineation)
- Shoreline Jurisdictional Areas
- Water bodies, including designated wetlands and their buffers.

In any case, it is up to the individual jurisdiction to analyze and justify in their report how the various policies or regulations impact the land capacity analysis, according to local land-use regulations and data sources.

Step #3:
Subtract lands needed for other public purposes. This includes utility corridors, landfills, sewage treatment plants, recreation, schools, and other public uses (GMA, Section 15, RCW 36.70A. 150).

Areas in this category include public and private properties that are either currently owned and operated or will be needed to meet future needs in developing areas. Common owners of these lands, for example, may include utility companies, school districts, parks departments, or railroads, to name a few. Likewise, the type of property tax exemption applied to these properties can be used to select these lands initially. In any case, any lands removed from the capacity for step 3 should consider that the predominate existing or planned use of the land is such that it would not reasonably be regarded as available for any residential, commercial, or industrial development. Sample areas to be removed from available capacity include, but are not limited to:

1. **Roads or rights-of-way (ROW)** - This category includes lands needed for circulation facilities as relatively undeveloped areas begin to develop. Existing ROWs should be removed, and a percentage of acres of land capacity should be subtracted from the overall capacity to account for internal circulation and other circulation needs. The percentage subtracted should be determined based on development trends unique to the individual jurisdiction. Those assumptions then need to be documented in the individual jurisdictions' reports.

2. **School sites** - this includes both existing sites and those additional needs that will be generated by growth in development areas.

3. **Park sites** - this includes both existing sites and those additional needs generated by growth in developing areas. When available, the local jurisdiction's level of service for parks provision should be used to estimate the amount to be removed.

4. **Utility substations, corridors, and other facilities** - this category includes both existing and anticipated sites and corridors that would preclude residential, commercial, or industrial development.

5. **Other public lands** - any other public need known to the local jurisdiction.

Step #4:
Subtract ..." that percentage of land"... that you assume will not be available for development within your plan's 20-year timeframe. Assume that a certain percentage of vacant, under-utilized, and partially-used lands will permanently be excluded from development."

This factor considers that not all available lands will become available for development in the next 20 years. This could be due to a variety of personal and economic reasons. Applied universally to all capacity areas, it is safe to assume a percentage of all vacant, partially used,

or underutilized land will not develop within the 20-year timeframe. This percentage taken out of capacity for various unknown economic and social reasons is known as the market factor.

There is insufficient data available locally, regionally, or state-level data to determine an exact market factor to apply. Too many variables are at play to determine the market factor with any certainty. Therefore, County jurisdictions assume that approximately 30 percent of the land will not be available for development during the next 20 years.

Given the difficulty when rural lands (those outside the UGA) are developed or redeveloped, assuming a higher market factor in those areas is generally acceptable. For this reason, it is assumed that half (50 percent) of capacity in rural areas will not be available for development within 20 years.

Step# 5:
Determine total capacity. After determining desirable densities and land uses for various areas within your jurisdiction (i.e., vacant, partially used, and underutilized), multiply the number of acres in remaining parcels by the number of units per acre allowed in the area where the parcel is located. Add together to determine total capacity of vacant, under- utilized, and partially-used lands."

The sorting of the available land supply according to the generalized existing residential, commercial, and industrial zoning categories is critical to determining total land capacity. The land capacity analysis and the report will estimate the future land capacity given existing zoning. To do this, historic development data and other information sources available to each jurisdiction should be used to determine an assumed development capacity by zone for all capacity lands. Assumptions should be provided for the number of dwelling units per acre expected in various zones and the number of people per unit expected in those areas. Secondary information sources, such as the US Census and Office of Financial Management data, can be used to inform the population assumptions in this step. Separate calculations can be applied to vacant, underutilized, and partially used portions of each jurisdiction's capacity, provided those assumptions are documented.

Step# 6
Compare the population and unit capacity estimated by this process against the adopted population and housing allocation forecasts for each jurisdiction.

Once the capacity in both units and population is generated, it should be compared to the population growth forecast for each jurisdiction and the housing allocation required by House Bill 1220. By comparing population and unit capacity against the forecast allocation set by the Steering Committee of Elected Officials and, ultimately, the Board of County Commissioners, jurisdictions can determine what steps the State requires to comply (i.e., annexation, UGA modifications, regulation amendments).

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Commercial and industrial lands will not be calculated in this category.

Underutilized Land- These parcels are zoned for more intensive use than currently occupying the property. For example, a single-family home in a multi-family zoning district would fit this category. If a parcel is classified as underutilized, it is not included in the partially used category as the capacity does not assume the existing use would remain if redeveloped.

An existing residential use(s) on a commercial or industrial-zoned parcel will be considered underutilized and counted as such. A parcel in a commercial or industrial zone with an improvement-value of four times the land value or less should also be reviewed further for the likelihood that it would be redeveloped for residential or commercial/industrial use. Each jurisdiction should then determine the likelihood that redevelopment of these parcels would

include residential units or commercial/industrial uses and include them in their underutilized land accordingly.

The Assessor considers an improvement-to-land value ratio of 4 to 1 "average" for typical uses. Accordingly, these parcels may not be redeveloped in the 20-year timeframe if the improvement value is high enough, even if the use is generally non-conforming. Likewise, an Assessor Property Class of 391 can be used to select these properties and to review whether they should be included in the Underutilized category.

Step #2:
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If policies or regulations are such that development is wholly prohibited, then the area would be subtracted from the available land supply. If development would be allowed with mitigating measures, then the land area or a portion of it should be counted as available. However, any exclusion should not imply that such land cannot be developed but instead recognizes that the difficulties associated with doing so are enough to limit development potential.

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- Natural resource lands (as defined in RCW 36.70A)
- Steep slopes and other geohazards (according to locally adopted critical areas ordinances or other local delineation)
- Shoreline Jurisdictional Areas
- Water bodies, including designated wetlands and their buffers.

In any case, it is up to the individual jurisdiction to analyze and justify in their report how the various policies or regulations impact the land capacity analysis, according to local land-use regulations and data sources.

Step #3:
Subtract lands needed for other public purposes. This includes utility corridors, landfills, sewage treatment plants, recreation, schools, and other public uses (GMA, Section 15, RCW 36.70A. 150).

Areas in this category include public and private properties that are either currently owned and operated or will be needed to meet future needs in developing areas. Common owners of these lands, for example, may include utility companies, school districts, parks departments, or railroads, to name a few. Likewise, the type of property tax exemption applied to these properties can be used to select these lands initially. In any case, any lands removed from the capacity for step 3 should consider that the predominate existing or planned use of the land is such that it would not reasonably be regarded as available for any residential, commercial, or industrial development. Sample areas to be removed from available capacity include, but are not limited to:

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2. **School sites** - this includes both existing sites and those additional needs that will be generated by growth in development areas.

3. **Park sites** - this includes both existing sites and those additional needs generated by growth in developing areas. When available, the local jurisdiction's level of service for parks provision should be used to estimate the amount to be removed.

4. **Utility substations, corridors, and other facilities** - this category includes both existing and anticipated sites and corridors that would preclude residential, commercial, or industrial development.

5. **Other public lands** - any other public need known to the local jurisdiction.

Step #4:
Subtract ..." that percentage of land"... that you assume will not be available for development within your plan's 20-year timeframe. Assume that a certain percentage of vacant, under-utilized, and partially-used lands will permanently be excluded from development."

This factor considers that not all available lands will become available for development in the next 20 years. This could be due to a variety of personal and economic reasons. Applied universally to all capacity areas, it is safe to assume a percentage of all vacant, partially used,

or underutilized land will not develop within the 20-year timeframe. This percentage taken out of capacity for various unknown economic and social reasons is known as the market factor.

There is insufficient data available locally, regionally, or state-level data to determine an exact market factor to apply. Too many variables are at play to determine the market factor with any certainty. Therefore, County jurisdictions assume that approximately 30 percent of the land will not be available for development during the next 20 years.

Given the difficulty when rural lands (those outside the UGA) are developed or redeveloped, assuming a higher market factor in those areas is generally acceptable. For this reason, it is assumed that half (50 percent) of capacity in rural areas will not be available for development within 20 years.

Step# 5:
Determine total capacity. After determining desirable densities and land uses for various areas within your jurisdiction (i.e., vacant, partially used, and underutilized), multiply the number of acres in remaining parcels by the number of units per acre allowed in the area where the parcel is located. Add together to determine total capacity of vacant, under- utilized, and partially-used lands."

The sorting of the available land supply according to the generalized existing residential, commercial, and industrial zoning categories is critical to determining total land capacity. The land capacity analysis and the report will estimate the future land capacity given existing zoning. To do this, historic development data and other information sources available to each jurisdiction should be used to determine an assumed development capacity by zone for all capacity lands. Assumptions should be provided for the number of dwelling units per acre expected in various zones and the number of people per unit expected in those areas. Secondary information sources, such as the US Census and Office of Financial Management data, can be used to inform the population assumptions in this step. Separate calculations can be applied to vacant, underutilized, and partially used portions of each jurisdiction's capacity, provided those assumptions are documented.

Step# 6
Compare the population and unit capacity estimated by this process against the adopted population and housing allocation forecasts for each jurisdiction.

Once the capacity in both units and population is generated, it should be compared to the population growth forecast for each jurisdiction and the housing allocation required by House Bill 1220. By comparing population and unit capacity against the forecast allocation set by the Steering Committee of Elected Officials and, ultimately, the Board of County Commissioners, jurisdictions can determine what steps the State requires to comply (i.e., annexation, UGA modifications, regulation amendments).