



RESPONSE TO DEPARTMENT OF COMMERCE

Appendix R

Appendix R—City of Arlington Response to the Department of Commerce

City responses are provided in the Notes column in bold, italicized text.

Periodic Update Checklist for Fully Planning Cities

Notice: This checklist has been updated with the new 2024 GMA legislation. Rows that include new 2023 and 2024 legislative changes or updated Commerce guidance are shown in light orange, and all statutory changes adopted since 2015 are emphasized in highlighted text to help identify new GMA requirements that may not have been addressed during the last periodic update or through other amendments outside of the required periodic update process. Additionally, amendments to the GMA are summarized in [this document](#) on Commerce's [GMA Laws and Rules webpage](#).

development regulations that may need updating to reflect the latest local conditions or to comply with GMA changes since the last periodic update cycle (2015-2018).

Local governments should review local comprehensive plan policies, countywide planning policies and multicounty planning policies (where applicable) to be consistent with the new requirements.

Checklist Instructions

Please use the most recent versions of your comprehensive plan and development regulations to fill out each item in the check list and answer the following questions:

Is this item addressed in your current plan or development regulations? If YES, fill in the form with citation(s) to where in the plan or regulation the item is addressed. Where possible, we recommend citing policy or goal numbers by element rather than page numbers, since these can change. If you

Arlington 10.21.2024
City

Jeff Aken & Housing, Climate Teams.

Staff contact, phone + email

Overview: This checklist is intended to help cities that are fully planning under the Growth Management Act (GMA) conduct the “periodic review and update” of *comprehensive plans* and *development regulations* required under [RCW 36.70A.130 \(5\)](#). This checklist identifies components of comprehensive plans and

have questions about the requirement, follow the hyperlinks to the relevant statutory provision or rules. If you still have questions, visit the Commerce [Periodic Update webpage](#) or contact the [Commerce planner assigned to your region](#).

Is amendment needed to meet current statute ? Check YES to indicate a change to your plan will be needed. Check NO to indicate that the GMA requirement has already been met. Local updates may not be needed if the statute hasn't changed since your previous update, if your jurisdiction has kept current with required inventories, or if there haven't been many changes in local circumstances.

Use the "Notes" column to add additional information to note where your city may elect to work on or amend sections of your plan or development regulations, to call out sections that are not strictly required by the GMA, or to indicate if the item is not applicable to your jurisdiction.

Submit your checklist ! This will be the first deliverable under your [periodic update grant](#).

PlanView system and instructions : Completed checklists can be submitted through Commerce's PlanView portal. The PlanView system allows cities and counties to submit and track amendments to comprehensive plans or development regulations online, with or without a user account. You can also submit via email: reviewteam@commerce.wa.gov Fill out and attach a [cover sheet](#), a copy of your submittal and this checklist. *Please be advised that Commerce is no longer accepting paper submittals*

For further information about the submittal process, please visit Commerce's [Growth Management Act Laws and Rules webpage](#).

Need help?

Please visit Commerce's [periodic update webpage](#) for additional resources.

Or contact:

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Or, [your assigned regional planner](#)

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Section I: Comprehensive Plan

Land Use Element

Consistent with countywide planning policies (CWPPs) and [RCW 36.70A.070\(1\)](#) amended in 2023

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p>Notice: 2021-2022 legislation ESSB 5593 includes changes to RCW 36.70A.130 regarding UGA size, patterns of development, suitability and infrastructure.</p> <p>Coordinate these efforts with your county.</p>			Not planned for this update cycle, but in next 20-years is considering a UGA expansion and working with Snohomish County.	Completed: <input type="checkbox"/> Date:
<p>a. The element integrates relevant county-wide planning policies into the local planning process, and ensures local goals and policies are consistent. For jurisdictions in the central Puget Sound region, the plan is consistent with applicable multicounty planning policies. RCW 36.70A.210 WAC 365-196-305</p> <p>Coordinate these efforts with your county.</p>	Yes,		<p>Yes, introduction and community profile page 9.</p> <p>Consider adding policy language to LU Element around consistency to strengthen this piece.</p> <p><i>City of Arlington Response: The City has provided consistency to county planning policies in Appendix P.</i></p>	Completed: <input type="checkbox"/> Date:
<p>b. A future land use map showing city limits and UGA boundaries. RCW 36.70A.070(1) amended in 2023 and RCW 36.70A.110(6) WAC 365-196-400(2)(d), WAC 365-196-405(2)(i)(ii)</p>	Yes,			Completed: <input type="checkbox"/> Date:
<p>c. Consideration of urban planning approaches that increase physical activity and reduce per capita vehicle miles traveled within the jurisdiction, but without increasing greenhouse gas emissions elsewhere in the state. RCW 36.70A.070(1) (amended in 2023) and WAC 365-196-405(2)(j).</p> <p>Additional resources: Commerce's Climate guidance, Transportation Efficient Communities' guidance, and the WA Department of Health Washington State Plan for Healthy Communities and Active Community Environment Toolkit</p>	Yes,		LU1-1.4, LU4.6,	Completed: <input type="checkbox"/> Date:

Section I: Comprehensive Plan

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
d. A consistent population projection throughout the plan which should be consistent with the jurisdiction's allocation of countywide population and housing needs. RCW 36.70A.115 RCW 43.62.035 and WAC 365-196-405(f)	Yes,	Yes,	While this information is in the supporting analysis documents, based on RCW 36.70A.070(1), the population projection should be included in the Land Use Element. <i>City of Arlington Response: The population projections have been added on page 8 of the Land Use Book.</i>	Completed: <input type="checkbox"/> Date:
e. Estimates of population densities and building intensities based on future land uses and housing needs. RCW 36.70A.070(1) (amended in 2023), WAC 365-196-405(2)(i) <ul style="list-style-type: none"> For cities required to plan under the Buildable Lands Program, RCW 36.70A.215 amended in 2017, some jurisdictions may need to identify reasonable measures to reconcile inconsistencies. See Commerce's Buildable Lands Program page. 	Yes,			Completed: <input type="checkbox"/> Date:
f. Provisions for protection of the quality and quantity of groundwater used for public water supplies. RCW 36.70A.070(1) (amended in 2023), WAC 365-196-405(1)(c) ; WAC 365-196-485(1)(d)	Yes,	Yes,	E-1.4, E-5.4, cover groundwater, the RCW states this shall be in the Land Use Element. <u>Recommendation:</u> Consider adding policy language or reference to the Land Use Element to be consistent with the RCW. <i>City of Arlington Response: Added Land Use Policy LU-6.6 on page 8 of the Land Use Book 2.</i>	Completed: <input type="checkbox"/> Date:
g. Identification of lands useful for public purposes such as utility corridors, transportation corridors, landfills, sewage treatment facilities, storm water management facilities, recreation, schools and other public uses. RCW 36.70A.150 and WAC 365-196-340	Yes,		Part 3, pg. 67. Book 2 supporting analysis states that public includes public utilities, community facilities, schools etc.	Completed: <input type="checkbox"/> Date:

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p>h. Identification of open space corridors and green spaces within and between urban growth areas, including lands useful for recreation, wildlife habitat, trails and connection of critical areas, and urban and community forests within the UGA. RCW 36.70A.070(1) amended in 2023, RCW 36.70A.160 and WAC 365-196-335</p>	TBD.		<p>Parks is listed as a category in public/semi-public but not clear if this includes corridors and community forested areas.</p> <p><i>City of Arlington Response: As part of climate and resiliency planning, the City intends to further evaluate these corridors and urban and community forest conditions in the UGA. Subarea planning for the various subareas in the city also will address this by proposing community parks in proximity to residences and connectivity to/from these.</i></p>	<p>Completed: <input type="checkbox"/></p> <p>Date:</p>
<p>i. If there is an airport within or adjacent to the city: policies, land use designations (and zoning) to discourage the siting of incompatible uses adjacent to general aviation airports. RCW 36.70A.510, RCW 36.70.547</p> <p>Note: The plan (and associated regulations) must be filed with the Aviation Division of WSDOT. WAC 365-196-455</p>	Yes,		<p>We did not see policies related to the airport in the LU Element besides LU-5.1 relating to manufacturing, industrial etc. CFU-3.16 also states working with airport and adopted master plan. PS-2.3 deals with compatible uses.</p> <p><u>Recommendation:</u> Reference existing policies such as PS-2.3 in LU Element or add policy language about siting incompatible uses consistent with RCW.</p> <p><i>City of Arlington Response: The City added a new policy LU-5.6 discouraging incompatible uses near the airport.</i></p>	<p>Completed: <input type="checkbox"/></p> <p>Date:</p>
<p>j. Where applicable, a review of drainage, flooding and stormwater run-off in the area and nearby jurisdictions and provide guidance for corrective actions to mitigate or cleanse those discharges that pollute waters of the state. RCW 36.70A.070(1) (amended in 2023) and WAC 365-196-405(2)(e)</p> <p>Note: RCW 90.56.010(27) defines waters of the state.</p> <p>Additional resources: Commerce's climate guidance, Protect Puget Sound Watersheds, Building Cities in the Rain, Ecology Stormwater Manuals, Puget Sound Partnership Action Agenda</p>	Yes,		Book 1 Environment has these policies.	<p>Completed: <input type="checkbox"/></p> <p>Date:</p>

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
k. Policies to designate and protect critical areas including wetlands, fish and wildlife habitat protection areas, frequently flooded areas, critical aquifer recharge areas and geologically hazardous areas. In developing these policies, the city must have included the best available science (BAS) to protect the functions and values of critical areas, and give “special consideration” to conservation or protection measures necessary to preserve or enhance anadromous fisheries. RCW 36.70A.030(6) , RCW 36.70A.172 , WAC 365-190-080 . Best Available Science: see WAC 365-195-900 through -925	Yes,		LU-6.3, LU-8.7, E-1.2,	Completed: <input type="checkbox"/> Date:
l. If forest or agricultural lands of long-term commercial significance are designated inside a city: a program authorizing Transfer (or Purchase) of Development Rights. RCW 36.70A.060(4) , RCW 36.70A.170	N/A			Completed: <input type="checkbox"/> Date:
m. If there is a Military Base within or adjacent to the jurisdiction employing 100 or more personnel: policies, land use designations, (and consistent zoning) to discourage the siting of incompatible uses adjacent to military bases. RCW 36.70A.530(3) , WAC 365-196-475	N/A			Completed: <input type="checkbox"/> Date:
n. New section RCW 36.70A.142 (2022), HB 1799: Development regulations newly developed, updated, or amended <i>after January 1, 2025</i> allow for the siting of organic materials (OM) management facilities as identified in local solid waste management plans (SWMP) to meet OM reduction and diversion goals. Siting must meet criteria described in RCW 70A.205.040(3) See also RCW 36.70.330 For applicability, see RCW 70A.205.540 .	No,	Yes,	Recommendation: Work with Snohomish County and solid waste providers to address RCW. Potentially adding organic materials to CFU-8. <i>City of Arlington Response: This has been added to as a new policy—CFU8.6.</i>	Completed: <input type="checkbox"/> Date:

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
o. Give special consideration to achieving environmental justice in goals and policies, including efforts to avoid creating or worsening environmental health disparities. RCW 36.70A.070(1) amended in 2023.	Yes,		LU-6,	Completed: <input type="checkbox"/> Date:
p. The land use element must reduce and mitigate the risk to lives and property posed by wildfires by using land use planning tools and through wildfire preparedness and fire adaptation measures. RCW 36.70A.070(1) amended in 2023. See also: International Wildland-Urban Interface Code	No,	Yes,	Recommendation: Add policy language consistent with RCW potentially expanding CFU 4.3 to add land use planning. <i>City of Arlington Response: This has been added to CFU4.3.</i>	Completed: <input type="checkbox"/> Date:

Housing Element

New legislation substantially amended the housing-related provisions of the Growth Management Act (GMA), [RCW 36.70A.070\(2\)](#). Local governments should review local comprehensive plan policies and countywide planning policies to be consistent with the updated requirements. Please refer to [Commerce’s housing webpage](#) for further information. See also [Appendix A](#) of this checklist for the new 2023 minimum housing unit requirements per city population.

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p>Notice: For more information about what these housing element requirements involve and what Commerce staff will be reviewing for, please see the Expanded Housing Checklist located on the Updating GMA Housing Elements webpage.</p>			Completed by Commerce Housing Staff using Expanded Housing Checklist.	
<p>a. Goals, policies and objectives for:</p> <ul style="list-style-type: none"> the preservation, improvement and development of housing RCW 36.70A.070(2)(b); moderate density housing options including, but not limited to, duplexes, triplexes, and townhomes, within an urban growth area boundary, RCW 36.70A.070(2)(b) and WAC 365-196-410(2)(a); and Consideration of housing locations in relation to employment locations and the role of ADUs. RCW 36.70A.070(2)(d) new in 2021 <p>Notice: <i>These items were separately listed in the previous version of the checklist. No content was changed.</i></p>	Yes,			Completed: <input type="checkbox"/> Date:
<p>b. An inventory and analysis of existing and projected housing needs over the planning period, by income band, consistent with the jurisdiction’s share of countywide housing need, as provided by Commerce. RCW 36.70A.070(2)(a) amended in 2021, WAC 365-196-410(2)(b) and (c)</p>	No,	Yes,	<p>Please include the city’s housing allocations by income band in the Housing Element. RCW 36.70A.070(2)(a)</p> <p><i>City of Arlington Response: The income band table has been added on page 3 of the Housing Book.</i></p>	Completed: <input type="checkbox"/> Date:

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p>c. Identification of capacity of land for housing including, but not limited to, government-assisted housing, housing for moderate, low, very low, and extremely low-income households, manufactured housing, multifamily housing, group homes, foster care facilities, emergency housing, emergency shelters and permanent supportive housing. RCW 36.70A.070(2)(c) amended in 2021, WAC 365-196-410(e) and (f)</p>	TBD:		<p>CHANGES NEEDED:</p> <p><i>Please calculate land capacity using assumed density (density likely to occur over the planning horizon) rather than maximum density allowed under the zoning code, unless available data supports the assumption that development is likely to occur at the maximum intensity allowed.</i></p> <p><i>Please evaluate the impact of occupancy, spacing, and intensity restrictions for permanent supportive housing on capacity for this housing type, or note if this was included.</i></p> <p><i>Please evaluate the impact of occupancy, spacing, and intensity restrictions for emergency housing and shelter on capacity for these housing types, or note if this was included.</i></p> <p><i>For the emergency housing land capacity analysis, please only include capacity in zones that allow emergency housing and shelter.</i></p> <p>City of Arlington Response: <i>This work has been completed and capacity related to the 20-year growth targets allocated to the City of Arlington by Snohomish County is fully reflected throughout the Comprehensive Plan.</i></p> <p><i>The City also has evaluated potential impact of occupancy, spacing, and intensity restrictions for permanent supportive housing and emergency housing and shelter. Sufficient capacity for these housing needs has been confirmed.</i></p> <p><i>Refer to the following Appendices to the Comprehensive Plan: Appendix D HB 1220 Analysis, Appendix E Emergency Housing Template, and Appendix F Forecast Methodology and Discussion</i></p> <p><i>Refer to the following updated Zoning Code Chapters and Ordinances: Chapter 20.08 – Definitions (Ordinance No. 2024-010), Chapter 20.40 – Permissible Uses (Ordinance No. 2024-019), and Chapter 20.44 – Supplemental Uses Section 20.44.050 and 20.44.070 (Ordinance No. 2024-020).</i></p>	<p>Completed: <input type="checkbox"/></p> <p>Date:</p>

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p>d. Adequate provisions for existing and projected housing needs for all economic segments of the community, including documenting barriers and actions needed to achieve housing availability. RCW 36.70A.070(2)(d), amended in 2021, WAC 365-196-010(g)(ii), WAC 365-196-300(f), WAC 365-196-410 and see Commerce’s Housing Action Plan (HAP) guidance: Guidance for Developing a Housing Action Plan.</p>	TBD		<p>The Adequate Provisions Analysis is off to a great start; we look forward to reviewing the moderate density housing and ADU checklists once they are completed.</p> <p>We recommend including a summary of the Adequate Provisions Analysis in the Housing Element and refer to Appendix D for more details.</p> <p><i>City of Arlington Response: a summary of the Adequate Provisions Analysis has been included in the Appendix list referring to Appendix D for more detail. There are four supporting analysis documents for the Housing Book</i></p> <p><i>Refer to the following updated and existing Zoning Code Chapters and Ordinances: Chapter 20.44 – Supplemental Uses – Section 20.44.042 Accessory Dwelling Units (Ordinance No. 2023-016), and Chapter 20.40 – Permissible Uses (Ordinance No. 2024019 and Ordinance No. 2021-012).</i></p>	<p>Completed: <input type="checkbox"/></p> <p>Date:</p>
<p>e. Identify local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing, including:</p> <ul style="list-style-type: none"> • Zoning that may have a discriminatory effect; • Disinvestment; and • Infrastructure availability <p>RCW 36.70A.070 (2)(e) new in 2021</p>	Yes,		<p>We recommend including key findings from the Racially Disparate Impacts Analysis in the Housing Element and refer to Appendix B for more details.</p> <p><i>City of Arlington Response: Key findings and displacement mitigation has been added to the Housing Book 3 on pages 4 and 5, with reference to Appendix B.</i></p>	<p>Completed: <input type="checkbox"/></p> <p>Date:</p>
<p>f. Establish policies and regulations to address and begin to undo racially disparate impacts, displacement, and exclusion in housing caused by local policies, plans, and actions. RCW 36.70A.070(2)(f) new in 2021</p>	Yes,			<p>Completed: <input type="checkbox"/></p> <p>Date:</p>

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p>g. Identification of areas that may be at higher risk of displacement from market forces that occur with changes to zoning development regulations and capital investments. <u>RCW 36.70A.070(2)(g)</u> new in 2021</p> <p>Establish anti-displacement policies, with consideration given to the preservation of historical and cultural communities as well as investments in low, very low, extremely low, and moderate-income housing; equitable development initiatives; inclusionary zoning; community planning requirements; tenant protections; land disposition policies; and consideration of land that may be used for affordable housing. <u>RCW 36.70A.070(2)(h)</u> new in 2021</p> <p>See also: Support Materials for Racially Disparate Impacts, Exclusion and Displacement Work</p>	Yes,		<p>Please include a sentence in the Housing Element about displacement risk and refer to Appendix B. for more details.</p> <p><i>City of Arlington Response: Key findings and displacement mitigation has been added to the Housing Book 3 on pages 4 and 5, with reference to Appendix B.</i></p>	<p>Completed: <input type="checkbox"/></p> <p>Date:</p>

Capital Facilities Plan (CFP) Element

To serve as a check on the practicality of achieving other elements of the plan, covering all capital facilities planned, provided and paid for by public entities including local government and special districts, etc . including water systems, sanitary sewer systems, storm water facilities, schools, parks and recreational facilities, police and fire protection facilities. Capital expenditures from park and recreation elements, if separate, should be included in the CFP Element. The CFP Element must be consistent with CWPPs, and [RCW 36.70A.070\(3\)](#) amended in 2023. Changes made to this element through [HB 1181](#) (climate change and resiliency) are not required, although jurisdictions should make a good faith effort to incorporate these items to be consistent with the new legislation.

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
a. Policies or procedures to ensure capital budget decisions are in conformity with the comprehensive plan. RCW 36.70A.120	No,	Yes,	We did not see a policy related to this in Book 8. Recommendation: Add policy or procedure to Capital Facilities and Utilities element. <i>City of Arlington Response: a policy has been added to the Capital Facilities and Utilities Book CFU3.17.</i>	Completed: <input type="checkbox"/> Date:
b. An inventory of existing capital facilities owned by public entities, including green infrastructure. RCW 36.70A.070(3)(a) amended in 2023 and WAC 365-196-415(1)(a)	Yes,		In CF& U book	Completed: <input type="checkbox"/> Date:
c. A forecast of needed capital facilities. RCW 36.70A.070(3)(b) and WAC 365-196-415(1)(b) Note: The forecast of future need should be based on projected population and adopted levels of service (LOS) over the planning period.	Yes,		CF & U book	Completed: <input type="checkbox"/> Date:
d. Proposed locations and capacities of expanded or new capital facilities. RCW 36.70A.070(3)(c) and WAC 365-196-415 (1)(c) and (3)(c) Infrastructure investments should consider equity and plan for any potential displacement impacts.	Yes,		System Plans and project lists	Completed: <input type="checkbox"/> Date:

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
e. A six-year plan (at minimum) that will finance such capital facilities within projected funding capacities and identify sources of public money to finance planned capital facilities. RCW 36.70A.070(3)(d) , RCW 36.70A.120 , WAC 365-196-415(1)(d)	TBD:	Yes,	<i>City of Arlington Response: The Capital Facilities and Utilities Supporting Analysis includes the capital improvements projects listings for City transportation and utilities infrastructure and identifies potential funding sources. In addition, Appendix I to the Comprehensive Plan provides the Arlington School District Capital Facilities Plan; Appendix J provides the Lakewood School District Capital Facilities Plan; and Appendix N provides the 6-year Capital Improvements Plan for Parks. Additional financing analysis is underway for the Transportation Master Plan, which will be completed in 2025. Utilities system planning for water and sewer is also going to be completed in 2025</i>	Completed: <input type="checkbox"/> Date:
f. A policy or procedure to reassess the land use element if probable funding falls short of meeting existing needs. RCW 36.70A.070(3)(e) , WAC 365-196-415(2)(d) Note: park and recreation facilities shall be included in the capital facilities plan element.	Yes,		CFU-3.6,	Completed: <input type="checkbox"/> Date:
g. If impact fees are collected: identification of public facilities on which money is to be spent. RCW 82.02.050(5) and WAC 365-196-850(3)	No,	Yes,	<i>City of Arlington Response: The City preparing a 6-year and 20-year financing plan as part of its Transportation Master Plan which will be completed in 2025. A draft Transportation Master Plan is provided in Appendix H to the Comprehensive Plan. Appendix H Appendix -- Draft Transportation Master Plan The City has established a Transportation Benefit District to support funding needed transportation improvements. The City is also updating the Parks and Recreation Master Plan to include new impact fees that meet state regulatory</i>	Completed: <input type="checkbox"/> Date:
h. Identify and include information about all public entities, including special purpose districts that own capital facilities. RCW 36.70A.070 (3) amended in 2023	Yes,			Completed: <input type="checkbox"/> Date:

Utilities Element

Consistent with relevant CWPPs and [RCW 36.70A.070\(4\)](#) amended in 2023. Utilities include, but are not limited to: sanitary sewer systems, water lines, fire suppression, electrical lines, telecommunication lines, and natural gas lines. Changes made to this element through [HB 1181](#) (climate change and resiliency) are not required, although jurisdictions should make a good faith effort to incorporate these items to be consistent with the new legislation.

<p>a. The general location, proposed location and capacity of all existing and proposed utilities, to include telecommunications.</p> <p>RCW 36.70A.070(4)(a) amended in 2023 and WAC 365-196-420</p>	<p>No,</p>	<p>Yes,</p>	<p>Didn't see telecommunications/broadband identified.</p> <p><i>City of Arlington Response: Telecommunications (including broadband) providers are described on page 21 of the Supporting Analysis section for Capital Facilities and Utilities. The City refers to each provider's mapping and location information on a project by project basis because this information is subject to change and updates.</i></p>	<p>Completed: <input type="checkbox"/></p> <p>Date:</p>
<p>b. Identify and include information and contact information about all public entities, including special purpose districts that own utility systems.</p> <p>RCW 36.70A.070 (4)(b) new in 2023</p>	<p>Yes,</p>	<p>Yes,</p>	<p>Didn't see telecommunications/broadband identified.</p> <p><i>City of Arlington Response: Telecommunications (including broadband) providers are described on page 21 of the Supporting Analysis section for Capital Facilities and Utilities. The City maintains a separate, active list of contacts for ongoing reference because this information is subject to change/updates.</i></p>	<p>Completed: <input type="checkbox"/></p> <p>Date:</p>

Transportation Element

Consistent with relevant CWPPs and [RCW 36.70A.070\(6\)](#) amended in 2023 by HB 1181. See also the new [climate element](#) below for jurisdictional requirements.

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
a. An inventory of air, water and ground transportation facilities and services, including transit alignments, active transportation facilities, state-owned transportation facilities and general aviation airports. RCW 36.70A.070(6)(a)(iii)(A) amended in 2023 and WAC 365-196-430(2)(c) .	No,	Yes,	Not in comp plan but in TMP. Question for Amy, will TMP be adopted by reference as part of Comp Plan? <i>City of Arlington Response: The Transportation Master Plan is referenced in the Comprehensive Plan. The Transportation Master Plan is scheduled to be completed in 2025 and will be adopted separately referenced in Appendix A of the draft of the Transportation Master Plan is provided in Appendix H to the Comprehensive Plan.</i> Appendix H -- Draft Transportation Master Plan	Completed: <input type="checkbox"/> Date:
b. Adopted multimodal levels of service standards for all locally owned arterials, locally and regionally operated transit routes that serve UGAs, state-owned or operated transit routes that serve urban areas if the department of transportation has prepared such standards, and active transportation facilities to serve as a gauge to judge performance of the system and success in helping to achieve environmental justice. RCW 36.70A.070(6)(a)(iii)(B) and (C) amended in 2023 , WAC 365-196-430	Yes,		Yes, in TMP not Transportation Element.	Completed: <input type="checkbox"/> Date:
c. Identification of specific actions to bring transportation facilities and services to established multimodal LOS. RCW 36.70A.070(6)(a)(iii)(D) amended in 2023 , WAC 365-196-430	Yes,		TMP	Completed: <input type="checkbox"/> Date:

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p>d. A forecast of multimodal transportation for a minimum of 10 years including land use assumptions used in estimating travel. RCW 36.70A.070(6)(a)(i), RCW 36.70A.070 (6)(a)(iii)(E) amended in 2023, WAC 365-196-430(2)(f)</p>	Yes,	Yes,	<p>Forecast numbers in table 4-1 (jobs, housing) do not match growth targets in comprehensive plan.</p> <p><i>City of Arlington Response: This information is being updated in the Transportation Master Plan, which is scheduled to be completed in 2025.</i></p> <p><i>Transportation planning and the representative transportation improvement projects listed in the Comprehensive Plan and Transportation Master Plan (Draft in Appendix H) now align with the 20 year growth targets allocated to the City of Arlington by Snohomish County. The transportation analysts also had supported the analysis of a more aggressive growth scenario for the environmental impact statement, but the analysis did also include identifying projects needed for the 20-year growth allocations, and the project list in the Capital Facilities and Utilities supporting analysis is up to date to reflect those 20-year needs..</i></p>	Completed: <input type="checkbox"/> Date:
<p>e. A projection of state and local system needs to equitably meet current and future demand and equitably implement the multimodal network. RCW 36.70A.070(6)(a)(iii)(F) amended in 2023, WAC 365-196-430(1)(c)(vi) and RCW 47.06</p>	Yes,			Completed: <input type="checkbox"/> Date:

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
f. A transition plan for transportation as required in Title II of ADA . Perform self-evaluations of current facilities and develop a program access plan to address deficiencies and achieve the identification of physical obstacles, establish methods, perform modifications and identify leadership roles. RCW 36.70A.070(6)(a)(iii)(G) new in 2023.	Yes,		Under development and will be used to prioritize areas with higher pedestrian traffic levels.	Completed: <input type="checkbox"/> Date:
g. An active transportation component to include collaborative efforts to identify and designate planned improvements for active transportation facilities and corridors that address and encourage enhanced community access and promote healthy lifestyles. RCW 36.70A.070(6)(a)(vii) amended in 2023, WAC 365-196-430(2)(j)	Yes,		T-6.5, PS-9.2, H-10	Completed: <input type="checkbox"/> Date:
h. A description of any existing and planned transportation demand management (TDM) strategies, such as HOV lanes or subsidy programs, parking policies, etc. RCW 36.70A.070(6)(a)(vi) and WAC 365-196-430(2)(i)(i)	Yes,	No,	In TMP but not in Transportation element. <i>City of Arlington Response: This information is being updated in the Transportation Master Plan, which is scheduled to be completed in 2025.</i>	Completed: <input type="checkbox"/> Date:
i. An analysis of future funding capability to judge needs against probable funding resources. RCW 36.70A.070(6)(a)(iv)(A) WAC 365.196-430(2)(k)(iv)	No,	Yes,	We did not see this in our review, unless part of CIP which has not been reviewed yet. <i>City of Arlington Response: The Supporting Analysis section for Book 8 Capital Facilities and Utilities includes the capital improvements projects listings for City transportation and utilities infrastructure and identifies potential funding sources. Additionally, the City is preparing a 2022 financing plan as part of its Transportation Master Plan, which will be completed in 2025. A draft of the Transportation Master Plan provided as Appendix H to the Comprehensive Plan Appendix H – Draft Transportation Master Plan The City has established Transportation Benefit District to support funding needed transportation impro</i>	Completed: <input type="checkbox"/> Date:

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
j. A multi-year financing plan based on needs identified in the comprehensive plan, the appropriate parts of which serve as the basis for the 6-year street, road or transit program. RCW 36.70A.070(6)(a)(iv)(B) and RCW 35.77.010 , WAC 365-196-430(2)(k)(ii)	Yes,		TMP	Completed: <input type="checkbox"/> Date:
k. If probable funding falls short of meeting identified needs of the transportation system, including state transportation facilities, a discussion of how additional funds will be raised, or how land use assumptions will be reassessed to ensure that LOS standards will be met. RCW 36.70A.070(6)(a)(iv)(C) amended in 2023, WAC 365-196-430(2)(l)(iii)	Yes,		Reassessment strategy in the TMP	Completed: <input type="checkbox"/> Date:
l. A description of intergovernmental coordination efforts, including an assessment of the impacts of the transportation plan and land use assumptions on the transportation systems of adjacent jurisdictions and how it is consistent with the regional transportation plan. RCW 36.70A.070(6)(a)(v) ; WAC 365-196-430(1)(e) and 430(2)(a)(iii)	Yes,		TMP	Completed: <input type="checkbox"/> Date:

Shoreline

For shorelines of the state, the goals and policies of the shoreline management act as set forth in [RCW 90.58.020](#) are added as one of the goals of the Growth Management Act (GMA) as set forth in [RCW 36.70A.480](#). The goals and policies of a shoreline master program for a county or city approved under [RCW 90.58](#) shall be considered an element of the county or city's comprehensive plan.

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p>a. The policies, goals, and provisions of RCW 90.58 and applicable guidelines shall be the sole basis for determining compliance of a shoreline master program with this chapter except as the shoreline master program is required to comply with the internal consistency provisions of RCW 36.70A.070, 36.70A.040(4), 35.63.125, 35A.63.105, 36.70A.480</p>			<p>E-1.7 <i>Shoreline Master Program– Ordinance No. 2019 018 The amendment included updates to ensure compliance and consistency with requirements of the Shoreline Management Act and state regulations that have been added or changed since the last Shoreline Master Program update, and incorporate amendments deemed necessary to reflect changed circumstances, new information, or improved data. Pg. 39 Introduction.</i></p>	<p>Completed: <input type="checkbox"/> Date:</p>
<p>b. Shoreline master programs shall provide a level of protection to critical areas located within shorelines of the state that assures no net loss of shoreline ecological functions necessary to sustain shoreline natural resources as defined by department of ecology guidelines adopted pursuant to RCW 90.58.060.</p> <p>See Ecology's Shoreline planners' toolbox for the SMP Checklist and other resources.</p>				<p>Completed: <input type="checkbox"/> Date:</p>
<p>c. Shorelines of the state shall not be considered critical areas under this chapter except to the extent that specific areas located within shorelines of the state qualify for critical area designation based on the definition of critical areas provided by RCW 36.70A.030(5) and have been designated as such by a local government pursuant to RCW 36.70A.060(2)</p>				<p>Completed: <input type="checkbox"/> Date:</p>

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
d. If a local jurisdiction's master program does not include land necessary for buffers for critical areas that occur within shorelines of the state, as authorized by RCW 90.58.030(2)(f) , then the local jurisdiction shall continue to regulate those critical areas and their required buffers pursuant to RCW 36.70A.060(2) .				Completed: <input type="checkbox"/> Date:

Provisions for siting essential public facilities (EPFs)

Consistent with CWPPs and [RCW 36.70A.200](#) amended in 2021. This section can be included in the Capital Facilities Element, Land Use Element or in its own element. Sometimes the identification and siting process for EPFs is part of the CWPPs.

<p>a. A process or criteria for identifying and siting essential public facilities (EPFs). RCW 36.70A.200 and WAC 365-196-550(1)</p> <p>Notes: RCW 36.70A.200 amended 2021 regarding reentry and rehabilitation facilities. EPFs are defined in RCW 36.70A.200</p> <p>Regional transit authority facilities are included in the list of essential public facilities.</p>	Yes,		CFU3.11 and Appendix B: Essential Public Facility Siting Process.	Completed: <input type="checkbox"/> Date:
<p>b. Policies or procedures that ensure the comprehensive plan does not preclude the siting of EPFs. RCW 36.70A.200(5)</p> <p>Note: If the EPF siting process is in the CWPPs, this policy may be contained in the comprehensive plan as well. WAC 365-196-550(3)</p>	Yes,		CFU3.10	Completed: <input type="checkbox"/> Date:

Tribal Participation in Planning^{new in 2022} (see [HB 1717](#))

A federally recognized Indian tribe may voluntarily choose (opt-in) to participate in the local and regional planning processes. See Commerce’s new [Tribal Planning Coordination for GMA](#) webpage for guidance and staff contacts.

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
a. Mutually agreeable memorandum of agreement between local governments and tribes in regard to collaboration and participation in the planning process unless otherwise agreed at the end of a mediation period. RCW 36.70A.040(8)(a) ^{new in 2022} , RCW 36.70A.190 ^{new in 2022}	N/A		Tribal roads mentioned in Transportation but did not see formal agreement. <i>City of Arlington Response: The City regularly engages and coordinates with tribes in the region. This is a mutual agreement but no formal agreement has been made.</i>	Completed: <input type="checkbox"/> Date:
b. <i>Port elements</i> , if adopted, are developed collaboratively between the city, the applicable port and the applicable tribe(s), which shall comply with RCW 36.70A.040(8) RCW 36.70A.085 amended in 2022	N/A			Completed: <input type="checkbox"/> Date:
c. <i>Urban Growth Areas</i> counties and cities coordinate planning efforts for any areas planned for urban growth with applicable tribe(s). RCW 36.70A.110(1) amended 2022, RCW 36.70A.040(8)				Completed: <input type="checkbox"/> Date:

Climate Change and Resiliency

New in 2023, see [HB 1181](#). WAC updates are forthcoming .

A new required element for comprehensive plans and new goal of the GMA. Designed to reduce greenhouse gas (GHG) emissions, plan for resilience and support environmental justice. Climate elements must maximize economic, environmental and social co-benefits and prioritize environmental justice in order to avoid worsening environmental health disparities. A climate element can take the form of a single comprehensive plan chapter or be integrated into several chapters/elements such as housing, transportation and land use. Visit [Commerce’s Climate Program](#) webpage for further guidance, grants, tools and staff contacts . Per HB 1181, GHG reduction goals, policies, and programs not specifically identified in the [guidelines](#) must be based on scientifically credible projections and scenarios likely to result in equivalent harm avoidance, GHG emission reductions and/or per capita vehicle miles traveled (VMT) reductions.

All fully planning jurisdictions must have a resilience sub -element as part of their broader climate element. The following counties and their cities with a population greater than 6,000 as of April 1, 2021 must also have a greenhouse gas emissions reduction sub-element. Please also review the [Appendix](#) for requirements due in the upcoming periodic update.

- December 31, 2025 Deadline: Clark, Skagit, Thurston, Whatcom
- June 30, 2026 Deadline: Benton, Franklin, Spokane
- June 30, 2029 Deadline: These jurisdictions are only required to update two elements this cycle —the transportation and climate elements.

Jurisdictions may submit their greenhouse gas emissions reduction sub-element to Commerce for approval per [RCW 36.70A.096](#). Please contact Commerce for submittal requirements if you think your jurisdiction will request approval.

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
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Resiliency sub-element: items [a through d](#) are required for all fully planning jurisdictions

<p>a. Specific goals, policies and programs that identify, protect and enhance natural areas to foster resiliency to climate impacts, as well as areas of vital habitat for safe passage and species migration. RCW 36.70A.070(9) new in 2023</p>			<p>Notes from Commerce Climate Team: As noted in the Draft Implementation Actions, Arlington is not obligated to meet the climate -related changes to GMA until 2029. However, we appreciate that you have already integrated many climate goals and policies throughout your comprehensive plan.</p> <p>Commerce is updating the Washington Administrative Code (WAC) to set minimum standards for compliance with HB 1181 (Laws, 2023). Rulemaking will be complete by the end of 2025, and we will regularly ask for feedback.</p>	<p>Completed: <input type="checkbox"/> Date:</p>
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			<p>Your 2029 implementation progress report will need to include climate change and resiliency policies that meet those standards, so I invite you to engage with our team over the next year.</p> <p>Things to consider as you move forward:</p> <ul style="list-style-type: none"> • Climate change and resiliency guidance: Commerce regularly updates the periodic checklists and guidance documents regarding climate change and resiliency. Be sure to review these updates with future submittals. • New voluntary approval process: Per RCW 36.70A.096, a county or city that develops a GHG emissions reduction sub-element may submit it to Commerce for approval. If your city is interested, then they must notify Commerce in writing 120 days prior to applying for approval of the sub-element. <p><i>City of Arlington Response: Thank you for your guidance. The City intends to move forward with climate and resiliency planning prior to or in alignment with the 2029 timeline.</i></p>	
<p>b. Specific goals, policies and programs that identify, protect and enhance community resiliency to climate change impacts, including social, economic and built environment factors that support adaptation to climate impacts consistent with environmental justice. RCW 36.70A.070(9) new in 2023</p>				<p>Completed: <input type="checkbox"/></p> <p>Date:</p>

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p>c. Specific goals, policies and programs that address natural hazards created or aggravated by climate change, including sea level rise, landslides, flooding, drought, heat, smoke, wildfire and other effects of changes to temperature and precipitation patterns. RCW 36.70A.070(9) new in 2023</p> <p>Note: include a goal and supportive policy for each climate-exacerbated hazard that is relevant to your jurisdiction.</p>				Completed: <input type="checkbox"/> Date:
<p>d. Prioritize actions (pursuant to a-c) that benefit overburdened communities that will disproportionately suffer from compounding environmental impacts and will be most impacted by natural hazards due to climate change. RCW 36.70A.070(9) new in 2023</p>				Completed: <input type="checkbox"/> Date:
Greenhouse Gas (GHG) Emissions Reduction subelement: items <u>e through i</u> are only required for jurisdictions identified above				
<p>e. Greenhouse gas emissions reduction sub-elements must include goals and policies to reduce emissions and per capita vehicle miles traveled. RCW 36.70A.070(9) new in 2023</p> <p>Note: Commerce recommends that jurisdictions use 2022 as a baseline year for their GHG inventories and set incremental targets that lead to achieving Washington’s economy-wide target of net zero emissions in 2050 set forth in RCW 70A.45.020(1). Commerce also recommends that jurisdictions should, at a minimum, include goals and policies within the following sectors: Transportation; Buildings & Energy; and, Zoning & Development. The rulemaking process is underway.</p>				Completed: <input type="checkbox"/> Date:

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
f. Identified actions that the jurisdiction will take during the planning cycle that will result in reductions in overall GHG emissions generated by transportation within the jurisdiction. RCW 36.70A.070(9) new in 2023				Completed: <input type="checkbox"/> Date:
g. Identified actions that the jurisdiction will take during the planning cycle that will result in reductions in overall GHG emissions generated by land use within the jurisdiction. RCW 36.70A.070(9) new in 2023				Completed: <input type="checkbox"/> Date:
h. Identified actions that the jurisdiction will take during the planning cycle that will result in reductions in per capita vehicle miles traveled (VMT) within the jurisdiction. RCW 36.70A.070(9) new in 2023				Completed: <input type="checkbox"/> Date:
i. Prioritize GHG and VMT reductions that benefit overburdened communities in order to maximize the co-benefits of reduced air pollution and environmental justice. RCW 36.70A.070(9) new in 2023				Completed: <input type="checkbox"/> Date:

Future required elements: pending state funding

As of 2022, these elements have not received state funding to aid local jurisdictions in implementation. Therefore, these elements are not required to be added to comprehensive plans at this time. Commerce encourages jurisdictions to begin planning for these elements, pending the future mandate.

	In Current Plan? Yes/No If yes, cite section	Notes	
<p>Economic Development</p> <p>Although included in RCW 36.70A.070 “mandatory elements” an economic development element is not currently required because funding was not provided to assist in developing local elements when this element was added to the GMA. However, provisions for economic growth, vitality, and a high quality of life are important, and supporting strategies should be integrated with the land use, housing, utilities, and transportation elements. RCW 36.70A.070(7) amended in 2017</p>	Yes,		Completed: <input type="checkbox"/> Date:
<p>Parks and Recreation</p> <p>Implements and is consistent with the capital facilities plan. Include a ten-year demand estimate, evaluation of service and facilities needs and evaluation of tree canopy coverage within UGAs. RCW 36.70A.070(8) amended in 2023</p> <p>Although included in RCW 36.70A.070 “mandatory elements” a parks and recreation element is not currently required because the state did not provide funding to assist in developing local elements when this provision was added to the GMA. However, parks, recreation and open space planning are GMA goals, and it is important to plan for and fund these facilities.</p>	Yes,	<p>E-7 in the Environment Element addresses tree canopy. We did not see an overall tree canopy evaluation within the document.</p> <p><i>City of Arlington Response: The City plans on including the overall tree canopy evaluation with the climate and resiliency planning prior to or in alignment with the 2029 timeline.</i></p>	Completed: <input type="checkbox"/> Date:

Optional Elements

Pursuant to [RCW 36.70A.080](#) a comprehensive plan may include additional elements, items, or studies dealing with other subjects relating to the physical development within its jurisdiction, including, but not limited to:

	In Current Plan? Yes/No If yes, cite section	Notes	
Sub-Area Plans	Yes,	Section 3	Completed: <input type="checkbox"/> Date:
Conservation	Yes,	Part of environment element.	Completed: <input type="checkbox"/> Date:
Recreation	Yes,	In Parks, Recreation and Open Space Element.	Completed: <input type="checkbox"/> Date:
Solar Energy	No	<i>City of Arlington Response: Thank you for your guidance. The City intends to move forward with climate and resiliency planning prior to or in alignment with the 2029 timeline.</i>	Completed: <input type="checkbox"/> Date:

Consistency is required by the GMA

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
a. All plan elements must be consistent with relevant county-wide planning policies (CWPPs) and, where applicable, multi-county planning policies (MPPs), and the GMA. RCW 36.70A.100 and 210 , WAC 365-196-305 ; 400(2)(c) ; 510 and 520	Yes,		Introduction and Community profile discusses coordination and consistency.	Completed: <input type="checkbox"/> Date:
b. All plan elements must be consistent with each other. RCW 36.70A.070 (preamble) and WAC 365-197-040	Yes,		Pg. 41 "Other City Plans adopted by Reference"	Completed: <input type="checkbox"/> Date:
c. The plan must be coordinated with the plans of adjacent jurisdictions. RCW 36.70A.100 and WAC 365-196-520	Yes,		"Continuing coordination between all jurisdictions of Snohomish County" page 15 introduction.	Completed: <input type="checkbox"/> Date:

Public Participation

a. Plan ensures public participation in the comprehensive planning process. RCW 36.70A.020(11) , .035 , and .140 , WAC 365-196-600(3) provide possible public participation choices.	Yes,		Appendix K	Completed: <input type="checkbox"/> Date:
b. If the process for making amendments is included in the comprehensive plan: <ul style="list-style-type: none"> The plan provides that amendments are to be considered no more often than once a year, not including the exceptions described in RCW 36.70A.130(2), WAC 365-196-640 The plan sets out a procedure for adopting emergency amendments and defines emergency. RCW 36.70A.130(2)(b) and RCW 36.70A.390 new in 2021, (HB 1220 sections 3-5), WAC 365-196-650(4) 	N/A		I did not see comp plan amendments called out. <i>City of Arlington Response: The city addresses Comprehensive Plan Amendments and Zoning Code Amendments in the Zoning Code under Chapter 20.96.</i>	Completed: <input type="checkbox"/> Date:

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
c. Plan or program for monitoring how well comprehensive plan policies, development regulations, and other implementation techniques are achieving the comp plan's goals and the goals of the GMA. WAC 365-196-660 discusses a potential review of growth management implementation on a systematic basis. New 2021-2022 legislation HB 1241 provides that those jurisdictions with a periodic update due in 2024 have until December 31, 2024 to submit. This legislation also changed the update cycle to every ten years after the 2024-2027 cycle. Jurisdictions that meet the new criteria described in RCW 36.70A.130(9) will be required to submit an implementation progress report five years after the review and revision of their comprehensive plan.	Yes,		Introduction and Section V: Implementation Action & Monitoring posted September 2024.	Completed: <input type="checkbox"/> Date:
d. Considerations for preserving property rights. Local governments must evaluate proposed regulatory or administrative actions to assure that such actions do not result in an unconstitutional taking of private property. RCW 36.70A.370 . For further guidance see the 2018 Advisory Memo on the Unconstitutional Taking of Private Property	No	Yes,	Did not see this called out <i>City of Arlington Response: A policy is provided in the Comprehensive Plan LU-2.4, that addresses review of City projects to mitigate displacement risk and minimize impacts related to private properties.</i>	Completed: <input type="checkbox"/> Date:
e. Encourage the involvement of citizens in the planning process, <i>including the participation of vulnerable populations and overburdened communities</i> and ensure coordination between communities and jurisdictions to reconcile conflicts. HB 1181 (2023) revised RCW 36.70A.020 Planning Goals for inclusion of vulnerable populations and overburdened communities. RCW 36.70A.035 Public Participation was not amended under HB 1181.	TBD:		A public involvement plan is included (appendix k) but did not see process to ensure coordination with vulnerable and overburdened communities. Ask Amy. City of Arlington Response: It is the City's intent to continue to engage and coordinate with vulnerable and overburdened communities as part of future planning and implementation.	Completed: <input type="checkbox"/> Date:

Section II: Development Regulations

Must be consistent with and implement the comprehensive plan. [RCW 36.70A.040](#) [WAC 365-196-800](#) and [810](#)

Critical Areas

Regulations protecting critical areas are required by [RCW 36.70A.060\(2\)](#) [RCW 36.70A.172\(1\)](#) [WAC 365-190-080](#) and [WAC 365-195-900 through 925](#).

Please visit Commerce's [Critical Areas webpage](#) for resources and to complete the [Critical Areas Checklist](#). Critical areas regulations must be reviewed and updated, as necessary, to incorporate legislative changes and best available science. Jurisdictions using periodic update grant funds to update critical areas regulations must submit the critical areas checklist as a first deliverable, in addition to this periodic update checklist.

Zoning Code

Note: Please review the new 2023 housing laws in the [Washington State Housing Laws of 2019 through 2023](#) guidance, on Commerce's [Planning for Housing webpage](#) and [Appendix A](#) of this checklist.

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p>Notice: For more information about housing regulatory changes regarding supportive housing types, see Supportive Housing Types Review Checklist on the Updating GMA Housing Elements webpage. And for additional information on middle housing and ADU regulations, see the Middle Housing webpage.</p>				
<p>a. Zoning designations are consistent and implement land use designations that accommodate future housing needs by income bracket as allocated through the countywide planning process. (RCW 36.70A.070(2)(c)-amended in 2021 (HB 1220)</p> <p>Note: Zoning must reflect sufficient land capacity for all income housing needs, including emergency housing and permanent supportive housing.</p>				<p>Completed: <input type="checkbox"/></p> <p>Date:</p>

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p>b. Permanent supportive housing or transitional housing must be allowed where residences and hotels are allowed. RCW 35A.21.430 amended in 2021, RCW 35.21.683 amended in 2021, (HB 1220 sections 3-5)</p> <p>“permanent supportive housing” is defined in RCW 36.70A.030 “transitional housing” is defined in RCW 84.36.043(2)(c)</p>				<p>Completed: <input type="checkbox"/></p> <p>Date:</p>
<p>c. Indoor emergency shelters and indoor emergency housing must be allowed in any zones in which hotels are allowed, except in cities that have adopted an ordinance authorizing indoor emergency shelters and indoor emergency housing in a majority of zones within one-mile of transit. Indoor emergency housing must be allowed in areas with hotels. RCW 35A.21.430 amended in 2021, RCW 35.21.683, amended in 2021, (HB 1220 sections 3-5)</p> <p>Any limitations on emergency housing and emergency shelter must be connected to public health and safety and allow the siting of a sufficient number of units and beds necessary to meet projected needs (see Housing Element Book 2, pages 41-48), new in 2023</p> <p>“emergency housing” is defined in RCW 36.70A.030</p>				<p>Completed: <input type="checkbox"/></p> <p>Date:</p>
<p>d. The number of unrelated persons that occupy a household or dwelling unit except as provided in state law, for short-term rentals, or occupant load per square foot shall not be regulated or limited by cities. (HB 5235), RCW 35.21.682 new in 2021, RCW 35A.21.314 new in 2022, RCW 36.01.227 new in 2021</p>				<p>Completed: <input type="checkbox"/></p> <p>Date:</p>

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p>e. Limitations on the amount of parking local governments can require for low-income, senior, disabled and market-rate housing units located near high-quality transit service. RCW 36.70A.620 amended in 2020 and RCW 36.70A.600 amended in 2019</p>				<p>Completed: <input type="checkbox"/> Date:</p>
<p>f. Parking requirements must allow tandem, gravel or grass pavers, and new spaces must be at least 8 by 20 feet in size. Existing and non-conforming parking must be allowed to meet parking requirements for up to six spaces. SB 6015, new in 2024, must be addressed with the periodic update.</p> <p>Note: guidance coming fall 2024</p>				<p>Completed: <input type="checkbox"/> Date:</p>
<p>g. Family day care providers are allowed in all residential dwellings located in areas zoned for residential or commercial RCW 36.70A.450. Review RCW 43.216.010 for definition of family day care provider and WAC 365-196-865 for more information.</p>				<p>Completed: <input type="checkbox"/> Date:</p>
<p>h. Manufactured housing is regulated the same as site built housing. RCW 35.21.684 amended in 2019, RCW 35.63.160, RCW 35A.21.312 amended in 2019 and RCW 36.01.225 amended in 2019. A local government may require that manufactured homes: (1) are new, (2) are set on a permanent foundation, and (3) comply with local design standards applicable to other homes in the neighborhood, but may not discriminate against consumer choice in housing.</p> <p>See: National Manufactured Housing Construction and Safety Standards Act of 1974</p>				<p>Completed: <input type="checkbox"/> Date:</p>

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p>i. Accessory dwelling units (ADUs): cities (and counties) must adopt or amend by ordinance, and incorporate into their development regulations, zoning regulations and other official controls. RCW 36.70A.680 amended in 2023, RCW 36.70A.681 amended in 2023, RCW 36.70A.696 amended in 2023, RCW 36.70A.697 amended in 2020, RCW 36.70A.698 amended in 2020, RCW 36.70A.699 amended in 2020</p> <p>Must be adopted by 6 months after the periodic update deadline, or be superseded by state law.</p> <p>Note: see new Commerce ADU guidance and ADU checklist.</p>				<p>Completed: <input type="checkbox"/></p> <p>Date:</p>
<p>j. Middle housing: if your jurisdiction is one of the 77 cities subject to middle housing, regulations must allow the appropriate amount of middle housing units on a lot by 6 months after the periodic update deadline, or be superseded by state law. RCW 36.70A.635</p> <p>See Commerce’s model ordinances and user guide on the middle housing web page.</p>				<p>Completed: <input type="checkbox"/></p> <p>Date:</p>
<p>k. Co-living must be allowed as a permitted use on any lot located within an urban growth area that allows at least six multifamily residential units, including on a lot zoned for mixed use development. HB 1998, new in 2024, contains specific standards for size, density calculations, connection fees and parking.</p> <p>Must be adopted by December 31, 2025</p> <p>Note: guidance will be available fall of 2024</p>				<p>Completed: <input type="checkbox"/></p> <p>Date:</p>

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p>l. Residential structures occupied by persons with handicaps, and group care for children that meets the definition of “familial status” are regulated the same as a similar residential structure occupied by a family or other unrelated individuals. No city or county planning under the GMA may enact or maintain ordinances, development regulations, or administrative practices which treat a residential structure occupied by persons with handicaps differently than a similar residential structure occupied by a family or other unrelated individuals. RCW 36.70A.410, RCW 70.128.140 and 150, RCW 49.60.222-225 and WAC 365-196-860</p>				<p>Completed: <input type="checkbox"/> Date:</p>
<p>m. Affordable housing programs enacted or expanded under RCW 36.70A.540 amended in 2022 comply with the requirements of this section. Examples of such programs may include: density bonuses within urban growth areas, height and bulk bonuses, fee waivers or exemptions, parking reductions, expedited permitting conditioned on provision of low-income housing units, or mixed-use projects. WAC 365-196-300</p> <p>See also RCW 36.70A.545 and WAC 365-196-410(2)(e)(i)</p> <p>“affordable housing” is defined in RCW 84.14.010 new in 2024 (ESSB 6175)</p> <p>Review RCW 36.70A.620 amended in 2020, for minimum residential parking requirements.</p>				<p>Completed: <input type="checkbox"/> Date:</p>
<p>n. Limitations on regulating: outdoor encampments, safe parking efforts, indoor overnight shelters and temporary small houses on property owned or controlled by a religious organization. RCW 35.21.915, amended in 2020</p>				<p>Completed: <input type="checkbox"/> Date:</p>

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
o. Allow an increased density bonus consistent with local needs for any affordable housing development of any single-family or multi-family residence located on real property owned or controlled by a religious organization. RCW 36.70A.545 , amended in 2019 (HB 1377).				Completed: <input type="checkbox"/> Date:
p. Reduce restrictions for additional housing units within existing commercial, mixed-use and multi-family buildings by exempting the added units from density limits, parking and other regulatory requirements. RCW 35A.21.440 , new in 2023 and RCW 35.21.990 , new in 2023, (HB 1042) Note: These requirements must be in effect within six months after the periodic update due date.				Completed: <input type="checkbox"/> Date:
q. Must not adopt, impose, or enforce requirements on an affordable housing development that are different than the requirements imposed on housing developments generally. RCW 36.130.020 (2008) Note: This applies to cities, counties, other local government entities and agencies.				Completed: <input type="checkbox"/> Date:
r. Regulations discourage incompatible uses around general aviation airports. RCW 36.70.547 and WAC 365-196-455 . Incompatible uses include: high population intensity uses such as schools, community centers, tall structures, and hazardous wildlife attractants such as solid waste disposal sites, wastewater or stormwater treatment facilities, or stockyards. For more guidance, see WSDOT's Aviation Land Use Compatibility Program .				Completed: <input type="checkbox"/> Date:

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p>s. If a U.S. Department of Defense(DoD) military base employing 100 or more personnel is within or adjacent to the jurisdiction, zoning should discourage the siting of incompatible uses adjacent to military base. RCW 36.70A.530(3)and WAC 365-196-475. Visit Military One Source to locate any bases in your area and help make determination of applicability. If applicable, inform the commander of the base regarding amendments to the comprehensive plan and development regulations on lands adjacent to the base.</p>				<p>Completed: <input type="checkbox"/> Date:</p>
<p>t. Electric vehicle infrastructure (jurisdiction specified: adjacent to Interstates 5, 90, 405 or state route 520 and other criteria) must be allowed as a use in all areas except those zoned for residential, resource use or critical areas. RCW 36.70A.695</p>				<p>Completed: <input type="checkbox"/> Date:</p>

Shoreline Master Program
Consistent with [RCW 90.58](#) Shoreline Management Act of 1971

<p>a. Zoning designations are consistent with Shoreline Master Program (SMP) environmental designations. RCW 36.70A.480</p>				<p>Completed: <input type="checkbox"/> Date:</p>
<p>b. If updated to meet RCW 36.70A.480(2010), SMP regulations provide protection to critical areas in shorelines that is at least equal to the protection provided to critical areas by the critical areas ordinance. RCW 36.70A.480(4)and RCW 90.58.090(4)</p> <p>See Ecology's shoreline planners' toolbox for the SMP Checklist and other resources and Ecology's Shoreline Master Programs Handbook webpage</p>				<p>Completed: <input type="checkbox"/> Date:</p>

Resource Lands

Defined in [RCW 36.70A.030\(3\), \(12\) and \(17\)](#) and consistent with [RCW 36.70A.060](#) and [RCW 36.70A.170](#)

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
a. Zoning is consistent with natural resource lands designations in the comprehensive plan and conserves natural resource lands. RCW 36.70A.060(3) , WAC 365-196-815 and WAC 365-190-020(6) . Consider innovative zoning techniques to conserve agricultural lands of long-term significance RCW 36.70A.177(2) See also WAC 365-196-815(3) for examples of innovative zoning techniques.				Completed: <input type="checkbox"/> Date:
b. Regulations to assure that use of lands adjacent to natural resource lands does not interfere with natural resource production. RCW 36.70A.060(1)(a) and WAC 365-190-040 Regulations require notice on all development permits and plats within 500 feet of designated natural resource lands that the property is within or near a designated natural resource land on which a variety of commercial activities may occur that are regulations to implement comprehensive plan				Completed: <input type="checkbox"/> Date:
c. For designated agricultural land, regulations encourage nonagricultural uses to be limited to lands with poor soils or otherwise not suitable for agricultural purposes. Accessory uses should be located, designed and operated to support the continuation of agricultural uses. RCW 36.70A.177(3)(b)				Completed: <input type="checkbox"/> Date:
d. Designate mineral lands and associated regulations as required by RCW 36.70A.131 and WAC 365-190-040(5) . For more information review the WA State Dept. of Natural Resources (DNR)'s Geology Division site				Completed: <input type="checkbox"/> Date:

Siting Essential Public Facilities

Regulations for siting essential public facilities should be consistent with [RCW 36.70A.200](#) and consider [WAC 365-196-550](#). Essential public facilities include those facilities that are typically difficult to site, such as airports, state education facilities, state or regional transportation facilities, state and local correctional facilities, solid waste handling facilities, and in-patient facilities including substance abuse facilities, mental health facilities, group homes, and secure community transition facilities. Regulations may be specific to a local jurisdiction, but may be part of county-wide planning policies (CWPPs).

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p>Regulations for CWPPs include a process for siting EPFs and ensure EPFs are not precluded. RCW 36.70A.200 amended in 2023, WAC 365-196-550(6) lists process for siting EPFs. WAC 365-196-550(3) details preclusions. EPFs should be located outside of known hazardous areas.</p> <p>Visit Commerce's Behavioral Health Facilities Program page for information on establishing or expanding new capacity for behavioral health EPFs.</p> <p>Note: RCW 36.70A.200 amended by SB 5536 to include EPFs for opioid treatment programs</p>				<p>Completed: <input type="checkbox"/></p> <p>Date:</p>

Subdivision Code

<p>a. Subdivision regulations are consistent with and implement comprehensive plan policies. RCW 36.70A.030(8), RCW 36.70A.040(4)</p>				<p>Completed: <input type="checkbox"/></p> <p>Date:</p>
<p>b. Written findings to approve subdivisions establish adequacy of public facilities. RCW 58.17.110 amended in 2018</p> <ul style="list-style-type: none"> • Streets or roads, sidewalks, alleys, other public ways, transit stops, and other features that assure safe walking conditions for students. • Potable water supplies, sanitary wastes, and drainage ways. RCW 36.70A.590 amended 2018 • Open spaces, parks and recreation, and playgrounds • Schools and school grounds <p>Other items related to the public health, safety and general welfare, WAC 365-196-820(1).</p>				<p>Completed: <input type="checkbox"/></p> <p>Date:</p>

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p>c. Preliminary subdivision approvals under RCW 58.17.140 and RCW 58.17.170 are valid for a period of five or seven years (previously five years).</p> <p>Note: preliminary plat approval is valid for: seven years if the date of preliminary plat approval is on or before December 31, 2014; five years if the preliminary plat approval is issued on or after January 1, 2015; and ten years if the project is located within city limits, not subject to the shoreline management act, and the preliminary plat is approved on or before December 31, 2007.</p>				<p>Completed: <input type="checkbox"/></p> <p>Date:</p>
<p>d. Include in short plat regulations procedures for unit lot subdivisions allowing division of a parent lot into separately owned unit lots. RCW 58.17.060 (3) new in 2023 by SB 5258 - section 11</p>				<p>Completed: <input type="checkbox"/></p> <p>Date:</p>

Stormwater

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p>a. Regulations protect water quality and implement actions to mitigate or cleanse drainage, flooding, and storm water run-off that pollute waters of the state, including Puget Sound or waters entering Puget Sound. RCW 36.70A.070(1) Regulations may include: adoption of a stormwater manual consistent with Ecology’s latest manual for Eastern or Western Washington, adoption of a clearing and grading ordinance – See Commerce’s 2005 Technical Guidance Document for Clearing and Grading in Western Washington.</p> <p>Adoption of a low impact development ordinance. See Puget Sound Partnership’s 2012 Low Impact Development guidance and Ecology’s 2013 Eastern Washington Low Impact Development guidance.</p> <p>Additional Resources: Federal Grants to Protect Puget Sound Watersheds, Building Cities in the Rain, Ecology Stormwater Manuals, Puget Sound Partnership Action Agenda</p>				Completed: <input type="checkbox"/> Date:
<p>b. Provisions for corrective action for failing septic systems that pollute waters of the state. RCW 36.70A.070(1). See also: DOH Wastewater Management, Ecology On-Site Sewage System Projects & Funding</p>				Completed: <input type="checkbox"/> Date:

Organic Materials Management Facilities

New in 2022, [HB 1799](#) added a section to the GMA aimed at reducing the volumes of organic materials collected in conjunction with other solid waste and delivered to landfills, supporting productive uses of organic material waste and reduction of methane gas (a greenhouse gas).

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p>New section RCW 36.70A.142, new in 2022 legislation HB 1799: Development regulations newly developed, updated, or amended after January 1, 2025 allow for the siting of organic materials (OM) management facilities as identified in local solid waste management plans (SWMP) to meet OM reduction and diversion goals. Siting to meet criteria described in RCW 70A.205.040(3)</p> <p>See also RCW 36.70.330 For applicability, see RCW 70A.205.540</p>				Completed: <input type="checkbox"/> Date:

Impact Fees

May impose impact fees on development activity as part of the financing for public facilities, provided that the financing for system improvements to serve new development must provide for a balance between impact fees and other sources of public funds; cannot rely solely on impact fees.

<p>a. If adopted, impact fees are applied consistent with RCW 82.02.050 amended in 2015, RCW 82.02.060 amended in 2023 by SB 5258, .070, .080, .090 amended in 2018 and .100.</p> <p>WAC 365-196-850 provides guidance on how impact fees should be implemented and spent.</p>				Completed: <input type="checkbox"/> Date:
<p>b. Jurisdictions collecting impact fees must adopt and maintain a system for the deferred collection of impact fees for single-family detached and attached residential construction, consistent with RCW 82.02.050(3) amended in 2016</p>				Completed: <input type="checkbox"/> Date:
<p>c. If adopted, limitations on impact fees for early learning facilities. RCW 82.02.060 amended in 2021</p>				Completed: <input type="checkbox"/> Date:

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
d. If adopted, exemption of impact fees for low-income and emergency housing development. RCW 82.02.060 amended in 2023. See also definition change in RCW 82.02.090(1)(b) amended in 2018				Completed: <input type="checkbox"/> Date:
e. Ensure impact fees are not assessed on the construction of accessory dwelling units that are greater than 50 percent (50%) of the impact fees that would be imposed on the principal unit. RCW 36.70A.681 new in 2023 by HB 1337				Completed: <input type="checkbox"/> Date:
f. The schedule of impact fees reflects the proportionate impact of new housing units, including multifamily and condominium units, based on the square footage, number of bedrooms, or trips generated, in the housing unit in order to produce a proportionally lower impact fee for smaller housing units. RCW 82.02.060 amended in 2023 by SB 5258				Completed: <input type="checkbox"/> Date:

Concurrency and Transportation Demand Management (TDM)

Ensures consistency in land use approval and the development of adequate public facilities as plans are implemented, maximizes the efficiency of existing transportation systems, limits the impacts of traffic and reduces pollution.

a. The transportation concurrency requirement includes specific language that prohibits development when level of service standards for transportation facilities cannot be met. RCW 36.70A.070(6)(b) amended in 2023, WAC 365-196-840 . Note: Concurrency is required for transportation, but may also be applied to park facilities, etc.				Completed: <input type="checkbox"/> Date:
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	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p>b. Measures exist to bring into compliance locally owned, or locally or regionally operated, transportation facilities or services that are below the levels of service established in the comprehensive plan. RCW 36.70A.070(6)(a)(iii)(B) and (D), RCW 36.70A.070(6)(b) amended in 2023</p> <p>Levels of service can be established for automobiles, pedestrians and bicycles. See WAC 365-196-840(3) on establishing an appropriate level of service.</p>				Completed: <input type="checkbox"/> Date:
<p>c. Highways of statewide significance (HSS) are exempt from the concurrency ordinance. RCW 36.70A.070(6)(a)(iii)(C)</p>				Completed: <input type="checkbox"/> Date:
<p>d. Traffic demand management (TDM) requirements are consistent with the comprehensive plan. RCW 36.70A.070(6)(a)(vi) Examples may include requiring new development to be oriented towards transit streets, pedestrian-oriented site and building design, and requiring bicycle and pedestrian connections to street and trail networks. WAC 365-196-840(4) recommends adopting methodologies that analyze the transportation system from a comprehensive, multimodal perspective.</p>				Completed: <input type="checkbox"/> Date:
<p>e. If required by RCW 82.70, a commute trip reduction (CTR) ordinance to achieve reductions in the proportion of single-occupant vehicle commute trips has been adopted. The ordinance should be consistent with comprehensive plan policies for CTR and Department of Transportation rules.</p>				Completed: <input type="checkbox"/> Date:

Tribal Participation in Planning^{new in 2022} (see [HB 1717](#))

A federally recognized Indian tribe may voluntarily choose to participate in the county or regional planning process. See Commerce’s new [Tribal Planning Coordination for GMA](#) webpage for guidance and staff contacts.

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
a. Mutually agreeable memorandum of agreement between local governments and tribes in regard to collaboration and participation in the planning process unless otherwise agreed at the end of a mediation period. RCW 36.70A.040(8)(a) ^{new in 2022} .				Completed: <input type="checkbox"/> Date:
b. Policies consistent with countywide planning policies that address the protection of tribal cultural resources in collaboration with federally recognized Indian tribes that are invited, provided that a tribe, or more than one tribe, chooses to participate in the process. RCW 36.70A.210(3)(i) ^{new in 2022} .				Completed: <input type="checkbox"/> Date:

Regulations to Implement Optional Elements

a. New fully contained communities are consistent with comprehensive plan policies, RCW 36.70A.350 and WAC 365-196-345				Completed: <input type="checkbox"/> Date:
b. If applicable, master planned resorts are consistent with comprehensive plan policies, RCW 36.70A.360 , RCW 36.70A.362 and WAC 365-196-460				Completed: <input type="checkbox"/> Date:
c. If applicable, major industrial developments and master planned locations outside of UGAs are consistent with comprehensive plan policies, RCW 36.70A.365 , RCW 36.70A.367 and WAC 365-196-465				Completed: <input type="checkbox"/> Date:
d. Regulations include procedures to identify, preserve, and/or monitor historical or archaeological resources. RCW 36.70A.020(13) WAC 365-196-450				Completed: <input type="checkbox"/> Date:

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
e. Other development regulations needed to implement comprehensive plan policies such as energy, sustainability or design are adopted. WAC 365-196-445				Completed: <input type="checkbox"/> Date:
f. Design guidelines for new development are clear and easy to understand; administration procedures are clear and defensible				Completed: <input type="checkbox"/> Date:
g. Local design review includes one or more ascertainable guideline, standard or criterion by which an applicant can determine whether a given building design is permissible under that development regulation. May not result in a reduction in density, height, bulk or scale below the generally applicable development regulations for a development proposal in the applicable zone. RCW 36.70A.630 new in 2023 by HB 1293				Completed: <input type="checkbox"/> Date:

Project Review Procedures

In 2023, [SB 5290](#) substantially amended local permit review processes. Codification and additional resources from Commerce are forthcoming.

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p>Project review processes integrate permit and environmental review. RCW 36.70A.470 RCW 36.70B and RCW 43.21C</p> <p>Also: WAC 365-196-845, WAC 197-11(SEPA Rules), WAC 365-197 (Project Consistency Rule, Commerce, 2001) and Ecology SEPA Handbook</p> <p>Integrated permit and environmental review procedures for:</p> <ul style="list-style-type: none"> • Notice of application • Notice of complete application • One open-record public hearing • Combining public hearings & decisions for multiple permits • Notice of decision • One closed-record appeal <p>Note: new in 2023, see Commerce's new guidance for Local Project Review and SB 5290</p>				<p>Completed: <input type="checkbox"/></p> <p>Date:</p>

Plan & Regulation Amendments

If procedures governing comprehensive plan amendments are part of the code, then assure the following are true:

a. Regulations limit amendments to the comprehensive plan to once a year (with statutory exceptions). RCW 36.70A.130(2) and WAC 365-196-640(3)				<p>Completed: <input type="checkbox"/></p> <p>Date:</p>
b. Regulations define <i>emergency</i> for an emergency plan amendment. RCW 36.70A.130(2)(b) and WAC 365-196-640(4)				<p>Completed: <input type="checkbox"/></p> <p>Date:</p>

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
c. Regulations include a docketing process for requesting and considering plan amendments. RCW 36.70A.130(2) RCW 36.70A.470 and WAC 365-196-640(6)				Completed: <input type="checkbox"/> Date:
d. A process has been established for early and continuous public notification and participation in the planning process. RCW 36.70A.020(11) , RCW 36.70A.035 and RCW 36.70A.140 . See WAC 365-196-600 regarding public participation and WAC 365-196-610(2) listing recommendations for meeting requirements.				Completed: <input type="checkbox"/> Date:
e. A process exists to assure that proposed regulatory or administrative actions do not result in an unconstitutional taking of private property RCW 36.70A.370 . See the 2018 Advisory Memo on the Unconstitutional Taking of Private Property				Completed: <input type="checkbox"/> Date:
f. Provisions ensure adequate enforcement of regulations, such as zoning and critical area ordinances (civil or criminal penalties). See implementation strategy in WAC 365-196-650(1) .				Completed: <input type="checkbox"/> Date:

Appendix A: Housing unit minimums per population

See Commerce’s [Middle Housing webpage](#) for more information and the [Middle Housing Fact Sheet](#) for the list of cities that must comply with the following requirements.

Cities with a population less than 25,000 but within the Contiguous UGA with the largest city in a county with a population greater than 275,000				
	In Current zoning? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
Zoning and development regulations allow at least two residential units per lot on all lots zoned predominantly for residential use, unless the lot is smaller than 1,000 square feet. RCW 36.70A.635 (1) and (6) HB 1110				Completed: <input type="checkbox"/> Date:

Cities with a population between 25,000 and 75,000				
	In Current zoning? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
a. Zoning and development regulations allow at least: <ul style="list-style-type: none"> • two residential units on each lot, • four residential units on each lot if at least one unit is affordable, unless the lot is smaller than 1,000 square feet. 				Completed: <input type="checkbox"/> Date:
b. Zoning and development regulations allow at least four residential units on each lot, within ¼ mile walking distance of a major transit stop.				Completed: <input type="checkbox"/> Date:

Cities with a population greater than 75,000

	In Current zoning? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
a. Zoning and development regulations allow at least: <ul style="list-style-type: none"> • four residential units on each lot, • six residential units on each lot if at least two units are affordable, unless the lot is smaller than 1,000 square feet. 				Completed: <input type="checkbox"/> Date:
b. Zoning and development regulations allow at least six residential units on each lot, within ¼ mile walking distance of a major transit stop.				Completed: <input type="checkbox"/> Date:

Appendix B: Element updates per HB 1181– Climate Change and Resiliency

GMA Periodic Update Due Dates	Required Updates to GMA Elements per HB 1181						
	Greenhouse Gas Reduction Sub-element	Climate Resilience Sub-element	Transportation Element	Land Use Element	Capital Facilities Element*	Utilities Element*	Parks & Recreation Element*
For jurisdictions with a 2024 deadline and subject to GHG Emissions Reduction [Sec. 15 (10)]	Due 2029	Due 2029	Due 2029	Due in 2034			
For jurisdictions with a 2025 & 2026 deadline and subject to GHG Emissions Reduction [Sec. 4 (1) and (2)]	X	X	X	X	X*	X*	X*
Jurisdictions <u>not</u> subject to GHG Emissions Reduction (all years) [Sec. 4 (3) and 9(e)(i)]	Optional	X See RCW 36.70A.070(9)(e)	**	Only counties over 20k pop.	X*	X*	X*

Table notes: “X” indicates a GMA update requirement. One asterisk (*) indicates jurisdictions should make a good faith effort to update their elements to be consistent; refer to HB 1181 (Chapter 228, Laws of 2023) for specifics. Two asterisks (**) indicates 22 cities that need to update their transportation element based on population, not whether or not their county is among those that must develop a GHG emissions element.

EXPANDED HOUSING CHECKLIST

Appendix R, Continued: City of Arlington Responses to Comments from the Department of Commerce *City responses are provided in the Notes column in bold, italicized text.*

Periodic Update Checklist for Fully Planning Cities and Counties¹ with additional checklist items for housing element review.²

This checklist provides the framework Commerce regional planners will use to review periodic update submissions. **This checklist is NOT required to be completed by each jurisdiction** ; it is an additional tool to help local planners meet the intent of the statute.

- Jurisdictions may submit draft housing elements to [Laura Hodgson](#) for initial review prior to 60-day review. Jurisdictions in the PSRC region are encouraged to submit draft housing elements to Commerce when it is submitted to PSRC and/or King County, as the requirements from the state are slightly different from the local or regional requirements.
- **Housing element submissions should include a land capacity analysis (LCA) reflecting updated policies** . This LCA may be included as a supporting document such as a Housing Needs Assessment (HNA) or simply a separate land capacity analysis document. If the LCA is missing from the submission, it will be requested by Commerce staff.
- Regional planners will review draft comprehensive plans and development regulations for the items **IN BOLD CAPITALIZED TEXT BELOW EACH ITEM**. If these materials are not included in the housing submission, Commerce staff will request them. More information on these requirements are included in parenthesis if additional information is needed. (Land use element review items are included for reference to ensure consistency between elements.)

¹ The checklist items in this document are applicable to cities and counties, unless otherwise noted, but the headings in the checklist may be slightly different from the county checklist.

² The May 2024 checklist includes the following updates: (1) Under Section I: Comprehensive Plan Elements, Housing Element, item (e) – clarified that a land capacity analysis is needed for emergency housing. (2) Under Section II: Development Regulations, item (b) – corrected state statute reference which was incorrect.

- Commerce will also be tracking that zoning changes are consistent with comprehensive plan changes and the LCA ([RCW 36.70A.115](#)). These zoning changes implement the policies in the comprehensive plan to plan for and accommodate housing affordable to all income brackets.
- **Questions?** Contact Laura Hodgson at Laura.Hodgson@commerce.wa.gov or 360-764-3143.

Section I: Comprehensive Plan Elements

Land Use Element

Consistent with countywide planning policies (CWPPs) and RCW 36.70A.070(1)

	Consistent? Yes/No	Changes needed?
<p>b. A future land use map showing land uses, city limits and UGA boundaries. RCW 36.70A.070(1) and RCW 36.70A.110(6) WAC 365-196-400(2)(d), WAC 365-196-405(2)(i)(ii)</p> <p>THE LAND USES MUST REFLECT PROJECTED GROWTH INCLUDING FUTURE HOUSING NEEDS.</p>	Yes	
<p>d. A consistent population projection throughout the plan which should be consistent with the jurisdiction's allocation of projected countywide population and housing needs. RCW 36.70A.115, RCW 43.62.035 and WAC 365-196-405(f)</p> <p>TABLE OR OTHER DOCUMENTATION OF LOCAL ALLOCATION OF POPULATION AND HOUSING NEEDS BY INCOME BRACKET FROM THE COUNTYWIDE PROCESS</p>	Yes	<p>While this information is in the supporting analysis documents, based on RCW 36.70A.070(1), the population projection should be included in the Land Use Element.</p> <p><i>City of Arlington Response: The growth targets and capacity have been added into the Land Use Book; see page 3</i></p>
<p>e. Estimates of population densities and building intensities based on future land uses and housing needs. RCW 36.70A.070(1) WAC 365-196-405(2)(i)</p> <p>ESTIMATES SHOULD INCLUDE ASSUMED DENSITIES TO ACCOMMODATE HOUSING NEEDS. (See WAC 365-196-210(6), and Housing Element Book 2: Step C and footnote 30 on page 24.)</p>	Yes	

Housing Element

In the 2021 legislative session, HB 1220 substantially amended the housing-related provisions of the Growth Management Act (GMA), RCW 36.70A.070(2). Local governments should review local comprehensive plan policies and countywide planning policies to be consistent with the updated requirements. Please refer to Commerce’s housing webpages for further information about the new requirements:

[Updating GMA Housing Elements](#) and [Planning for Housing](#).

	Consistent? Yes/No	Changes needed?
<p>a. Goals, policies and objectives for:</p> <ul style="list-style-type: none"> the preservation, improvement and development of housing, RCW 36.70A.070(2)(b), and moderate density housing options including, but not limited to, duplexes, triplexes, and townhomes, within an urban growth area boundary. RCW 36.70A.070(2)(b) amended in 2021, and WAC 365-196-410(2)(a) <p>ENSURE THERE ARE POLICIES ON A VARIETY OF MODERATE DENSITY HOUSING TYPES, SUCH AS DUPLEXES, TRIPLEXES, AND TOWNHOMES IN URBAN GROWTH AREAS</p>	Yes	
<p>b. Consideration of housing locations in relation to employment locations. RCW 36.70A.070(2)(d) amended in 2021</p> <p>LAND USE MAPS SHOULD SHOW HIGHER DENSITY HOUSING LOCATED NEAR EMPLOYMENT (COMMERCIAL) AND/OR ADJACENT TO HIGH QUALITY TRANSIT IF APPLICABLE. (Housing Element Book 2: see pages 67-68.)</p>	Yes	
<p>c. Consideration of the role of accessory dwelling units (ADUs) in meeting housing needs. RCW 36.70A.070(2)(d) amended in 2021</p> <p>TO SHOW CONSIDERATION OF ADUS, DO ONE OR BOTH OF THE FOLLOWING:</p> <p>(1) THE HOUSING NEEDS ASSESSMENT OR HOUSING ELEMENT MUST INCLUDE TEXT AND/OR POLICIES THAT ADDRESS THE POTENTIAL FOR ADUS TO MEET HOUSING NEEDS, OR</p> <p>(2) INCLUDE ADU CAPACITY IN LAND CAPACITY ANALYSIS. 20 ADU capacity should not exceed 10% of eligible lots.</p> <p>(See Housing Element Book 2 - ADU narrative guidance: pages 68-69; ADU capacity: see Step 1.6 on pages 27-28.)</p>	Yes	

Housing Element

In the 2021 legislative session, HB 1220 substantially amended the housing-related provisions of the Growth Management Act (GMA), RCW 36.70A.070(2). Local governments should review local comprehensive plan policies and countywide planning policies to be consistent with the updated requirements. Please refer to Commerce’s housing webpages for further information about the new requirements:

[Updating GMA Housing Elements](#) and [Planning for Housing](#).

	Consistent? Yes/No	Changes needed?
<p>d. An inventory and analysis of existing and projected housing needs over the planning period, by income band, consistent with the jurisdiction’s share of countywide housing need, as provided by Commerce. RCW 36.70A.070(2)(a) amended in 2021, WAC 365-196-410(2)(b) and (c)</p> <p>TABLE OR OTHER DOCUMENTATION OF LOCAL ALLOCATION OF HOUSING NEEDS BY INCOME BRACKET (Housing Element Book 1: see #6 of “Minimum standards for identifying and allocating projected housing needs” on page 60.)</p>		<p>Please include the city’s housing allocations by income band in the Housing Element. RCW 36.70A.070(2)(a)</p> <p><i>City of Arlington Response: The income band table has been added on page 3 of the Housing Book. Please also refer to Appendix D for the HB 1220 Analysis, Figure 2. Arlington Housing Allocations by Income.</i></p>
<p>e. Identification of capacity of land for housing including, but not limited to, government -assisted housing, housing for moderate, low, very low, and extremely low income households, manufactured housing, multifamily housing, group homes, foster care facilities, emergency housing, emergency shelters, permanent supportive housing. RCW 36.70A.070(2)(c) amended in 2021, WAC 365-196-410(e) and (f)</p> <p>STATEMENT SHOWING THERE IS SUFFICIENT CAPACITY OF LAND FOR ALL INCOME HOUSING NEEDS INCLUDING EMERGENCY HOUSING. INCLUDE A TABLE SHOWING THE BREAKDOWN OF CAPACITY IN ZONES WHICH ADD UP TO HOUSING NEEDS FOR ALL INCOME LEVELS INCLUDING EMERGENCY HOUSING. (Supporting documentation of land capacity analysis is encouraged.) (Housing Element Book 2: see bottom table of Exhibit 17 on page 40 and Exhibit 20 on page 48.)</p> <p>ANY LIMITATIONS ON SUPPORTIVE HOUSING TYPES (EMERGENCY HOUSING, EMERGENCY SHELTER(S), PERMANENT SUPPORTIVE HOUSING(SH), AND TRANSITIONAL HOUSING(TH)) MUST ALLOW THE SITING OF A SUFFICIENT NUMBER OF UNITS AND BEDS NECESSARY TO MEET PROJECTED NEEDS. (Housing Element Book 2: see pages 41-48.)</p> <p>THE ZONING MAP MUST BE CONSISTENT WITH AND IMPLEMENT THE LAND USE MAP A</p>	<p>TBD</p>	<p>CHANGES NEEDED:</p> <p>Please calculate land capacity using assumed density (density likely to occur over the planning horizon) rather than maximum density allowed under the zoning code, unless available data supports the assumption that development is likely to occur at the maximum intensity allowed.</p> <p>Please evaluate the impact of occupancy, spacing, and intensity restrictions for permanent supportive housing on capacity for this housing type, or note if this was included.</p> <p>Please evaluate the impact of occupancy, spacing, and intensity restrictions for emergency housing and shelter on</p>

Housing Element

In the 2021 legislative session, HB 1220 substantially amended the housing-related provisions of the Growth Management Act (GMA), RCW 36.70A.070(2). Local governments should review local comprehensive plan policies and countywide planning policies to be consistent with the updated requirements. Please refer to Commerce’s housing webpages for further information about the new requirements:

[Updating GMA Housing Elements](#) and [Planning for Housing](#).

LAND CAPACITY FINDINGS. (See [RCW 36.70A.115\(1\)](#) [WAC 365-196-800](#))

capacity for these housing types, or note if this was included.

For the emergency housing land capacity analysis, please only include capacity in zones that allow emergency housing and shelter.

City of Arlington Response: This work has been completed and capacity related to the 20-year growth targets allocated to the City of Arlington by Snohomish County is fully reflected throughout the Comprehensive Plan.

The City also has evaluated potential impact of occupancy, spacing, and intensity restrictions for permanent supportive housing and emergency housing and shelter. Sufficient capacity for these housing needs has been confirmed.

Refer to the following Appendices to the Comprehensive Plan: Appendix D HB 1220 Analysis, Appendix E Emergency Housing Template, and Appendix F Forecast Methodology and Discussion.

Refer to the following updated Zoning Code Chapters and Ordinances: Chapter 20.08-Definitions (Ordinance No. 2024-010), Chapter 20.40– Permissible Uses (Ordinance No. 2024-019), and Chapter 20.44 – Supplemental Uses Section 20.44.050 and 20.44.070 (Ordinance No. 2024-020).

	Consistent? Yes/No	Changes needed?
<p>f. Adequate provisions for existing and projected housing needs for all economic segments of the community. RCW 36.70A.070(2)(d) amended in 2021, WAC 365-196-010(g)(ii), WAC 365-196-300(f), WAC 365-196-410 and see Commerce’s Housing Action Plan (HAP) guidance: Guidance for Developing a Housing Action Plan</p> <p>INCLUDE A LIST OF BARRIERS TO AFFORDABLE HOUSING NEEDS, INCLUDING BARRIER EMERGENCY HOUSING AND PERMANENT SUPPORTIVE HOUSING (Housing Element Book 2: see page 50 and Appendix B.)</p> <p>INCLUDE A LIST OF ACTIONS NEEDED TO REMOVE BARRIERS TO AFFORDABLE HOUSING (Housing Element Book 2: see page 61 and Appendix B.)</p> <p>Note: Identification of barriers to affordable housing and actions to remove barriers do not need to be in table format, but both items need to be present in the housing element.</p>	TBD	<p>The Adequate Provisions Analysis is off to a great start; we look forward to reviewing the moderate density housing and ADU checklists once they are completed.</p> <p>We recommend including a summary of the Adequate Provisions Analysis in the Housing Element and refer to Appendix D for more details.</p> <p><i>City of Arlington Response: a summary of the Adequate Provisions Analysis has been included in the Appendix list referring to Appendix D for more detail. There are four supporting analysis documents for the Housing Book Refer to the following updated and existing Zoning Code Chapters and Ordinances: Chapter 20.44– Supplemental Uses– Section 20.44.042 Accessory Dwelling Units (Ordinance No. 2023-016), and Chapter 20.40– Permissible Uses (Ordinance No. 2024 019 and Ordinance No. 2021-012).</i></p>
<p>g. Identify local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing, including:</p> <ul style="list-style-type: none"> • Zoning that may have a discriminatory effect; • Disinvestment; and • Infrastructure availability <p>RCW 36.70A.070(e) new in 2021</p> <p>INCLUDE A STATEMENT OF WHETHER DATA SHOWS THERE ARE DISPARATE IMPACTS. NOTE: COMMERCE HAS DATA AVAILABLE FOR ALL JURISDICTIONS ON OUR NEW SITE. (Housing Element Book 3: see pages 19-20.)</p> <p>REVIEW OF HOUSING ELEMENT POLICIES AND REGULATIONS THAT HAVE LIE TO THESE IMPACTS. This may be in the housing element, housing needs assessment or the staff report. (Housing Element Book 3: see pages 33-36; this specific evaluation framework is not required.)</p>	Yes	<p>We recommend including key findings from the Racially Disparate Impacts Analysis in the Housing Element and refer to Appendix B for more details.</p> <p><i>City of Arlington Response: Key findings and displacement mitigation has been added to the Housing Book 3 on pages 4 and 5, with reference to Appendix B.</i></p>

	Consistent? Yes/No	Changes needed?
<p>h. Establish policies and regulations to address and begin to undo racially disparate impacts, displacement, and exclusion in housing caused by local policies, plans, and actions. RCW 36.70A.070(2)(f) new in 2021</p> <p>INCLUDE POLICIES TO ADDRESS THESE IMPACTS, OR THAT ADDRESS DEVELOPMENT OF MORE AFFORDABLE HOUSING, PRESERVATION OF EXISTING AFFORDABLE HOUSING AND PROTECTION OF EXISTING HOUSEHOLDS. (Policies: Housing Element Book 3, see pages 36-39 and Appendix C of Housing Element Book 2; Regulations: Housing Element Book 3, pages 43-44.)</p>	Yes	
<p>i. Identification of areas that may be at higher risk of displacement from market forces that occur with changes to zoning development regulations and capital investments . RCW 36.70A.070(2)(g) new in 2021</p> <p>DISCUSSION AND/OR MAP OF AREAS THAT MAY BE AT RISK OF DISPLACEMENT. (COMMERCE AND PSRC HAVE MAPS AVAILABLE, AND INCLUSION OF ONE WOULD MEET THIS REQUIREMENT.) (Housing Element Book 3; see pages 27-31.)</p> <p>Establish anti-displacement policies, with consideration given to the preservation of historical and cultural communities as well as investments in low, very low, extremely low, and moderate-income housing; equitable development initiatives; inclusionary zoning; community planning requirements; tenant protections; land disposition policies; and consideration of land that may be used for affordable housing. RCW 36.70A.070(2)(h) new in 2021</p> <p>SEE H ABOVE.</p>	Yes	<p>Please include a sentence in the Housing Element about displacement risk and refer to Appendix B. for more details .</p> <p><i>City of Arlington Response: Key findings and displacement mitigation has been added to the Housing Book 3 on pages 4 and 5, with reference to Appendix B.</i></p>

Consistency is required by the GMA

	Consistent? Yes/No	Changes needed?
<p>b. All plan elements must be consistent with each other. RCW 36.70A.070 (preamble) and WAC 365-196-500</p> <p>ENSURE CAPITAL FACILITIES, TRANSPORTATION AND UTILITIES ELEMENTS INCLUDE IMPROVEMENTS TO SUPPORT ADDED HOUSING DENSITY AND CONSIDER UNDERSERVED AREAS LIKELY CONSIDERATIONS WILL INCLUDE SYSTEM IMPROVEMENTS AND PRIORITIZING AND FUNDING THIS WORK. (Housing Element Book 2: see LCA Step 1.3 “Identify gaps in utility infrastructure and services” on page 22, and “Identify related infrastructure and service needs” on page 77.)</p>	Yes	

Public Participation

<p>a. Plan ensures public participation in the comprehensive planning process. RCW 36.70A.020(11), .035, and .140, WAC 365-196-600(3) provide possible public participation choices.</p> <p>THE PUBLIC PARTICIPATION PLAN SHOULD SHOW EFFORTS TO ENGAGE VULNERABLE POPULATIONS, OVERBURDENED COMMUNITIES, AND THOSE WHO MAY HAVE BEEN DISPARATELY IMPACTED BY HOUSING POLICIES. (Housing Element Book 3: see pages 15-19.)</p>	Yes	
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Section II: Development Regulations

Must be consistent with and implement the comprehensive plan . [RCW 36.70A.040](#) [WAC 365-196-800](#) and [810](#)

Zoning Code

	Consistent? Yes/No	Changes needed?
<p>a. Zoning designations are consistent and implement land use designations that accommodate future housing needs by income bracket as allocated through the countywide planning process. (RCW36.70A.070(2)(c) - Amended in 2021 with HB 1220)</p> <p>If subject to middle housing requirements in RCW 36.70A.635, see material on Commerce’s Middle Housing webpage.</p> <p>ZONINGMAP AND TEXTALLOW FOR THEHOUSING TYPES AND DENSITIESIN THE LAND CAPACITY ANALYSIS.</p> <p>THESE ZONING CHANGES MUST BE COMPLETEBY THE END OF THE PERIODUPDATE PERIOD.</p>	Yes	
<p>b. [FOR CITIES]Permanent supportive housing or transitional housing must be allowed where residences and hotels are allowed. RCW 35A.21.430amended in 2021, RCW 35.21.683 amended in 2021, (HB 1220 sections 3-5)</p> <p>“permanent supportive housing” and “transitional housing” is defined in RCW 36.70A.030 “transitional housing” is defined in RCW 84.36.043(3)(c)</p> <p>[FOR CITIES AND COUNTIES]NY LIMITATIONS ON PERMANENT SUPPORTIVE HOUSING AND TRANSITIONAL HOUSINGMUST BE CONNECTED TO PUBLIC HEALTH AND SAFETY AND ALLOW THE SITING OF A SUFFICIENT NUMBER OF UNITS AND BEDS NECESSARY MEET PROJECTED NEEDSHousing Element Book 2: see pages 41-48.)</p>	No	<p>The occupancy, spacing, and intensity restrictions for permanent supportive housing in AMC 20.40.040(c)(14) are not based on a demonstrated connection to a public health and safety need, and so are inconsistent with RCW 35A.21.430</p> <p>Please see the STEP Model Ordinance and User Guide for further guidance on this requirement.</p> <p><i>Refer to the following updated Zoning Code Chapters and Ordinances: Chapter 20.08 – Definitions (Ordinance No. 2024-010), Chapter 20.40– Permissible Uses (Ordinance No. 2024-019), and Chapter 20.44 – Supplemental Uses Section 20.44.050 and 20.44.070 (Ordinance No. 2024-020).</i></p>

	Consistent? Yes/No	Changes needed?
<p>c. [FOR CITIES] Indoor emergency shelters and indoor emergency housing shall be allowed in any zones in which hotels are allowed, except in cities that have adopted an ordinance authorizing indoor emergency shelters and indoor emergency housing in a majority of zones within one-mile of transit. Indoor emergency housing must be allowed in areas with hotels. RCW 35A.21.430 amended in 2021, RCW 35.21.683 amended in 2021, (HB 1220 sections 3-5)</p> <p>“emergency housing” is defined in RCW 36.70A.030(14)</p> <p>[FOR CITIES AND COUNTIES] ANIMATIONS ON EMERGENCY HOUSING AND EMERGENCY SHELTER MUST BE CONNECTED TO PUBLIC HEALTH AND SAFETY AND ALLOW THE SITING OF A SUFFICIENT NUMBER OF UNITS AND BEDS NECESSARY TO MEET PROJECTED NEEDS Housing Element Book 2: see pages 41-48.)</p>	No	<p>The occupancy, spacing, and intensity restrictions for emergency housing and shelter in AMC 20.40.040(c)(15) are not based on a demonstrated connection to a public health and safety need, and so are inconsistent with RCW 35A.21.430. Please see the STEP Model Ordinance and User Guide for further guidance on this requirement.</p> <p><i>Refer to the following updated Zoning Code Chapters and Ordinances: Chapter 20.08 – Definitions (Ordinance No. 2024-010), Chapter 20.40 – Permissible Uses (Ordinance No. 2024-019), and Chapter 20.44 – Supplemental Uses Section 20.44.050 and 20.44.070 (Ordinance No. 2024-020).</i></p>