



STATE OF WASHINGTON  
DEPARTMENT OF COMMUNITY,  
TRADE AND ECONOMIC DEVELOPMENT

# Buildable Lands Program Effectiveness Report

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This report to the Legislature is submitted in compliance with RCW 36.70A.215(5)(b)

December 31, 2007

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## EXECUTIVE SUMMARY

The Buildable Lands Program is an effective tool in helping counties and cities achieve the goals of the Growth Management Act (GMA) by improving the quality and availability of data for monitoring growth. The program operates in six western Washington counties and their 102 cities. This study evaluates the effectiveness of the program at its 10 year mark. Assessment tools used in this study include analysis of reports submitted by counties, a stakeholder feedback survey, and the convening of a focus group of local land use leaders.

The purpose of the buildable lands statute (RCW 36.70A.215) is two-fold. First, determine if counties and cities are achieving planned urban densities within the urban growth areas (UGA's) by comparing actual growth and development to the vision in the county-wide planning policies and jurisdictional comprehensive plans. The second purpose is to identify reasonable measures, other than adjusting the urban growth area (UGA), to be taken if there is an inconsistency between those policy frameworks and what happened "on the ground."

Counties report that urban densities have risen dramatically over the 10 years of the program, a major indicator of the success of the GMA. As a direct result of the buildable lands legislation, all of the counties have vastly increased their land use analysis abilities, allowing local jurisdictions to make significantly more informed land use decisions.

The buildable lands statute can be looked at as a four-step program designed to provide feedback on the progress being made by local comprehensive plans in complying with the GMA. The program's four steps are: 1) establishing appropriate policies; 2) ongoing data collection and analysis, which is reported every five years; 3) reviewing whether policy goals are being met; and 4) taking corrective actions when they are not met. This study found that:

1. Counties and their cities have been successful in implementing the requirements of the buildable lands program.
2. Counties and cities have instituted collection and reporting systems that produce high-quality and reliable data that is widely accepted.
3. Interpretations vary regarding the determination of inconsistencies between what was planned and actual development.
4. A number of counties and cities have adopted reasonable measures, but programs have been implemented with varying degrees of detail.
5. Different GMA deadlines do not allow the full use of buildable lands report data in policy decisions.
6. Counties and cities have made an effort to involve the public and stakeholders in the buildable lands process. However, the results have been uneven, and improvements could be made to enhance transparency and opportunities for input.

CTED proposes working with stakeholders and local jurisdictions on agency guidelines to address the following specific issues. As the process moves forward CTED may request that some of the issues be clarified through legislation. The department would work with the governor's office on any proposed legislation. These issues include:

- Clarify how to identify inconsistencies between planned and actual development;
- Establish guidelines regarding implementation of a reasonable measures program;
- Enhance procedures for transparency and public involvement; and
- Coordinate the timing of reports in relation to other GMA requirements.

During the last ten years the Buildable Lands Program has matured into an effective tool for measuring growth. As the program moves forward, there is an opportunity for counties and cities to develop a more robust review process for buildable lands reports. Doing so will help translate this knowledge into actions that enhance communities' evaluation of the success of their comprehensive plans.

# INTRODUCTION

## Scope of Study:

The Department of Community, Trade and Economic Development (CTED) is required by statute to produce this report to the Legislature on the effectiveness of the Buildable Lands Program at its 10-year anniversary. For participating counties and cities, the program is the common measure of whether they are able to accommodate their growth responsibilities under the Growth Management Act (GMA). The reports produced by each county under the program provide valuable documentation in support of policy decisions, such as urban growth area (UGA) changes and comprehensive plan updates.

To develop this report, CTED examined the county buildable land reports submitted in 2002 and 2007, collected stakeholder feedback, and reviewed their expectations. Measurement tools were developed with a consultant, including a quantitative assessment of the reporting process, and a qualitative assessment based on stakeholder feedback. The feedback process involved planners, elected officials, and parties interested in the land use process. (See Appendix A for more detailed information on how the evaluation was conducted.)

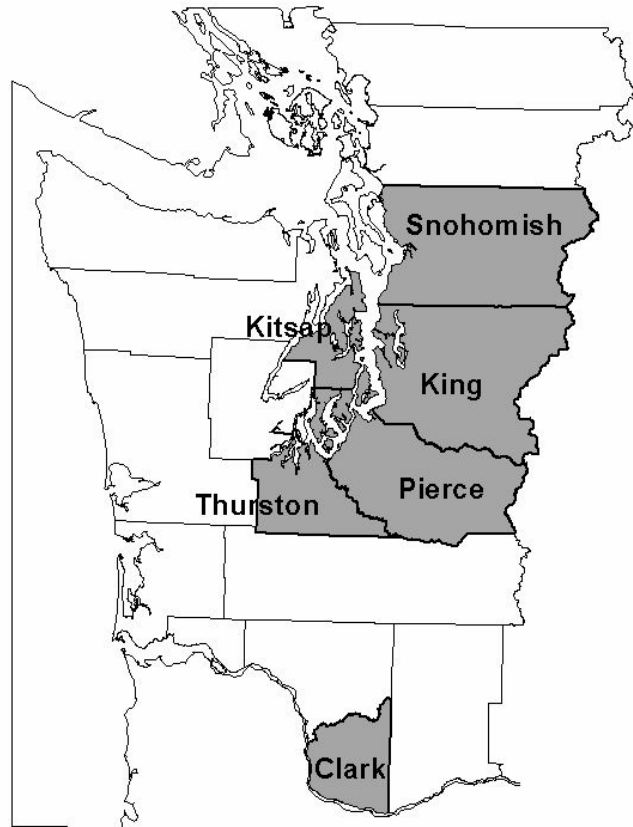
The Buildable Lands Program essentially comprises four steps carried out by each participating county and its cities. Each of these steps was assessed with an eye on the issues that arise from the procedural, technical, and policy aspects of program implementation. The program's four steps are: 1) establishing appropriate policies; 2) ongoing data gathering that leads to publishing five-year development reports; 3) reviewing whether program goals are being met; and 4) taking corrective actions when they are not.

## Legislative History:

The GMA was passed by the Legislature in 1990 to bring order and consistency to planning in Washington State. The act requires adoption of local comprehensive plans by counties meeting total population and growth rate thresholds. A major component of the planning process is establishment of UGA's intended to contain future growth at higher densities. Several years after implementation of the GMA, a heated debate between the environmental community and the building industry about how the act was being carried out resulted in the adoption of a program to measure growth management progress.

In 1997 the GMA was amended to include the Buildable Lands Program. This is a review and evaluation program aimed at determining if counties have an adequate amount of residential, commercial, and industrial land to meet the growth needs spelled out in their comprehensive plans. The program was designed to accomplish two goals:<sup>1</sup>

- Determine whether a county and its cities are achieving planning goals within UGA's by comparing growth and development assumptions with what has actually occurred in the county and cities.
- Identify reasonable measures, other than adjusting their urban growth boundaries, to ensure sufficient capacity to accommodate growth.



The buildable lands statute (RCW 36.70A.215) applies to the six most populous counties west of the Cascades – Clark, King, Kitsap, Pierce, Snohomish, and Thurston, and the 102 cities in these counties. CTED worked closely with representative of these counties to produce *Buildable Lands Program Guidelines* in 2000. These guidelines helped counties and their cities establish local programs for collecting and presenting the data to carry out the program.

County and city responsibilities include producing a report every five years on the status of their buildable lands. The first group of reports, written in 2002, was summarized by CTED in, *Buildable Lands Program: 2002 Evaluation Report -- A Summary of Finding*. The second group of reports was submitted in September 2007, and CTED's summary of these reports will be available soon. The 2002 and 2007 reports are the major focus of this study.

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<sup>1</sup> RCW 36.70A.215(1)

## Comprehensive Planning and Buildable Lands:

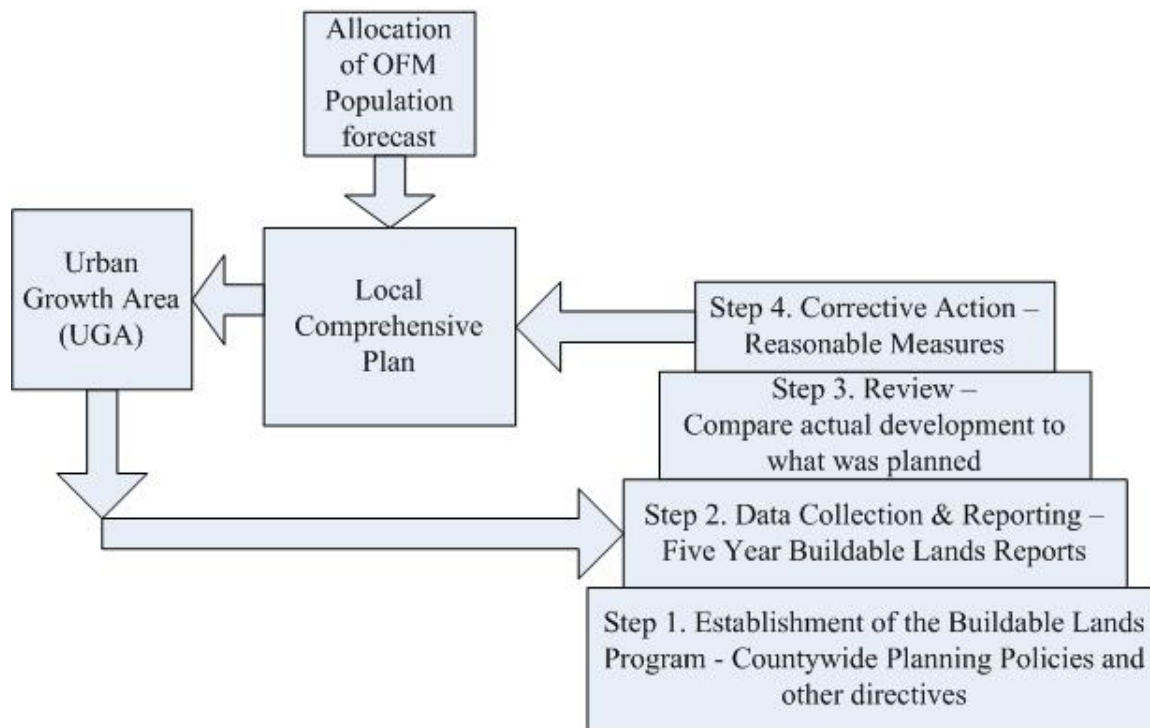
Comprehensive plans are built around the twenty-year population forecasts made by the Washington State Office of Financial Management (OFM). Counties and their cities must delineate an urban growth area large enough to accommodate the population projected for them. To provide for residential uses, an urban growth area is composed of a variety of land use zones, each of a different housing type or density. These planned densities provide a baseline for evaluating successful implementation of local plans.

An UGA also has other land uses, including commercial and industrial uses, open spaces, public facilities, and environmentally sensitive areas. The Buildable Lands Program addresses all of these uses. Figure 1 (see next page) illustrates how this program works within the comprehensive planning process.

- **STEP 1: Establishment of the program** -- Adopt county-wide planning policies that create the local buildable lands program and establish roles and responsibilities for the county and its cities related to data tracking and collection, reporting, review of plans versus actual growth, and corrective measures.
- **STEP 2: Data collection and reporting** -- Collect data on the amount, type, and density of development annually. Every five years complete a report that includes data on development activity, and analyzes the capacity of land suitable for development to meet future needs for housing and job growth. Assess development patterns for whether they are meeting the growth projections envisioned in each jurisdiction's comprehensive plan.
- **STEP 3: Review** -- Compare what was actually constructed with what was planned in the comprehensive plan. If the comparison indicates inconsistencies between the two, then proceed to Step 4.
- **STEP 4: Corrective action** -- Local governments develop corrective actions other than changing urban growth boundaries, such as zoning changes, permit streamlining, and development incentives. These actions, commonly called reasonable measures, are to be monitored annually to provide feedback to the ongoing planning process.

The Buildable Lands Program is important in the ten-year update of UGA's and the seven-year update of local comprehensive plans. Once the program is established in a given county, the five-year reports measure actual development. In the review phase, cities and counties compare development patterns with what was envisioned in the adopted land use plans to determine whether they are consistent with each other. The feedback loop is completed when corrective actions are taken to ensure a sufficient supply of land to meet future needs and, where needed, to increase the consistency with adopted plans and regulations.

Figure 1: How the Buildable Lands Program’s four implementation steps operate as a feedback mechanism for GMA planning.



Note that the Buildable Lands Program does not change the “bottom-up” nature of the GMA, which allows for considerable variation in approaches among local jurisdictions. The program is not intended to create new policies, but to inform them by measuring what is already adopted.

## Program Funding:

Financial support for the Buildable Lands Program comes from the cities, counties, and the State of Washington. In order to help defray costs, CTED provided \$5.5 million in direct grant funding to the six counties and their 102 cities between 1997 and 2001. When direct funding was discontinued in the 2002 supplemental state operations budget, the counties successfully competed for \$1 million provided through a CTED competitive grant program between 2003 and 2007. This funding was used for a variety of program-related tasks. The vast majority of the funds were used for data collection followed by improving geographic information systems (GIS) map technology. CTED funds were also used to perform studies, conduct market surveys, and hire the staff necessary to update procedures, adopt reasonable measures policy, create databases, and develop permit tracking systems.<sup>2</sup>

<sup>2</sup> CTED grant documents for buildable lands funding

In 2002, CTED conducted a survey that found that between 80 and 100 percent of Buildable Lands Program costs were being covered by state funds.<sup>3</sup> Since that time, funding has fluctuated from year to year, with no funding available in 2002. Meanwhile, the demands of the buildable lands process have grown in complexity, scope, and importance. Local governments have struggled to keep up with the increasing demands of the process.

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<sup>3</sup> CTED 2002 survey on state share of costs

## PROGRAM REVIEW

### Overview of Findings:

The Buildable Lands Program has played a key role in increasing the technical capacity of participating local jurisdictions to meet GMA requirements. This is the result of all six counties and their cities substantively implementing the statute – establishing the program and putting in place an effective reporting system. This has led to major improvements in their ability to accurately measure increasing urban densities and examine if sprawl is being contained. An additional benefit of the program has been the improvement in quality of land use data as a result of the cooperative effort required to collect and analyze the information for the five year reports.

Several counties are still in the early stages of implementing the third and fourth steps of the program. In order to fully realize the value of a mature process, the counties are beginning to transition from building technical capacity to enhancing the policies and procedures that allow more robust program review and corrective actions.

The program has been instrumental in evaluating the sufficiency of local plans and urban growth areas to accommodate growth, and reasonable measures have been adopted in a number of jurisdictions to ensure enough capacity for population and jobs. Further clarification of processes and timing followed in evaluating reports and adopting reasonable measures would enhance their usefulness and the public's opportunity to participate.

The program has had a meaningful impact in the update of comprehensive plans and in county-wide policy decisions on urban growth areas. The positive effect of the buildable lands program has been recognized by growth management hearings boards as a central consideration in policy decisions regarding urban growth area sizing.

### Program Findings:

#### **FINDING 1: Counties and their cities have been successful in implementing the requirements of the Buildable Lands Program.**

CTED found that the counties and cities have been successful in evaluating the sufficiency of local plans and urban growth areas to accommodate growth. This has led to adoption of reasonable measures in a number of jurisdictions to ensure enough capacity for population and jobs. Additionally, the program is informing the update of comprehensive plans and review of urban growth areas.

In reviewing the program's four steps, CTED found:

**Establishment of the program:** All six counties were successful in adopting county-wide planning policies to initiate the program. The counties, cities, and CTED worked together to publish a set of guidelines in June 2000 to carry out the program.

**Data collection and reporting:** With the counties or regional planning councils as the lead agency, all jurisdictions met the statutory requirements in both 2002 and 2007 to publish a buildable lands report and conform to CTED guidelines.

**Review:** In response to report findings, a number of jurisdictions decided that changes needed to be made in their plans to accommodate forecasted growth.

**Corrective actions:** Many of the above-mentioned jurisdictions adopted amendments to their local comprehensive plans and development regulations in response to the findings of their reports.

In short, counties and cities have successfully implemented the overall program by building a solid technical foundation for future reporting and continued inter-local cooperation in the areas of data collection and analysis.

## **FINDING 2: Counties and cities have instituted collection and reporting systems that produce high-quality and reliable data that is widely accepted.**

Counties and cities have succeeded in addressing the need to produce high-quality and reliable data, which was at the heart of the Legislature's intent in adopting the program.

Local jurisdictions have done an excellent job of collecting, analyzing, and reporting on development activity over the last ten years. This has been a huge undertaking, and the successful collection and clear presentation of the data is a major achievement. All jurisdictions have assembled inventories of urban lands suitable for development and estimates of development capacity. In addition to their use in buildable lands reports, these assembled data represent a valuable resource for city and county-wide planning.

Several reports feature narrative and photographic illustration of density and redevelopment activities. The local jurisdictions have been successful in using actual land use records in their data. When land data are not available, estimates are used. These include market factors, unbuildable land estimates, estimates of land set aside for public uses, and other adjustments intended to improve the overall accuracy of the report. Many counties have done follow-up studies to determine if these factors are realistic. This includes working with interested stakeholder groups to test assumptions and focus the data. Some counties have taken on additional studies in the form of calibration reports and compliance studies. Counties and cities have installed GIS and other systems that provide for good data collection and reporting. Many jurisdictions hired consultants to design formats to collect data. These data collection formats are intended to create consistency among the cities within each county.

One challenge is local employment data for industrial and commercial use. All of the buildable lands reports include data regarding the intensity of commercial and industrial land uses, but converting the geographic features of land into employment capacity is problematic. Data pertaining to the actual employment capacity of parcels or land use is not readily available. For instance, change in use of a building may change the number of employees, which is difficult to record. Employment data available from regulatory agencies are often considered proprietary

information, and thus not available at the parcel level. Some buildable lands reports offer the caveat that employment data limitations may result in an inaccurate reflection of actual commercial and industrial intensity.

### **FINDING 3: Interpretations vary regarding the determination of inconsistencies between what was planned and actual development.**

The review component of the program is set forth in the buildable lands statute.<sup>4</sup> Based on the information in the buildable lands reports, each city and county is required to make a determination of whether inconsistencies exist between actual development and existing plans.

Most counties and cities approach the determination of any inconsistencies as a two-step process, the first being a test of whether the urban growth area is large enough to accommodate future population forecasts. If a shortage of land is identified in the urban growth area, the second step is triggered. This should result in further investigation into the adopted policies and plans. Because many county reports show a more-than-sufficient capacity of land in most UGA's, little further action has been taken on the second step. Where the UGA capacity was found to be insufficient, a number of measures have been adopted to provide sufficient capacity.

A broader reading of the statute would indicate the need to include a comparison not just of the capacity of the UGA to accommodate growth, but also with overall policy goals envisioned in the jurisdiction's county-wide planning policies and comprehensive plan.

Clarification of how counties and cities must determine whether an inconsistency exists is needed to achieve the full value of the Buildable Lands Program.

The areas in need of clarification are as follows:

**Who should make the determination?** Most jurisdictions do not have adopted policies that clearly define who is responsible for making the finding of inconsistency.

**What is the appropriate type of action used to show that an evaluation has taken place?**

The Central Puget Sound Growth Management Hearings Board issued a decision advising formal adoption of each report.<sup>5</sup> Uncertainty remains regarding what type of action is required to meet the board's decision. There is also a question as to the most appropriate point in the program where the evaluation for inconsistencies should take place. Once the buildable lands report has been published, what actions do jurisdictions take to document completion of the evaluation?

**What is the appropriate policy level for review?** The current approach by counties ensures UGA's have sufficient capacity for projected growth. A broader interpretation by some stakeholders and CTED suggests additional evaluation compared to the county-wide planning policies, comprehensive plans, or development regulations as part of the review.

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<sup>4</sup> RCW 36.70A.215 (4)

<sup>5</sup> Seattle-King County Association of Realtors v. King County, CPSGMHB Case No. 04-3-0028 Final Decision and Order

**What is the appropriate geographic level for review?** A comparison of actual development to what was planned could take place at a variety of levels. Sufficiency of the UGA has been generally evaluated at the combined city and county level. If a broader interpretation of the statute is taken, it would require different policies to be evaluated at their intended level of implementation. For example, a goal for a specific ratio of rural-to-urban distribution of growth would be measured at the county-wide level. A goal for a ratio of housing to commercial uses in a mixed-use zone would be measured at the zoning district level.

**FINDING 4: A number of counties and cities have adopted reasonable measures, but programs have been implemented with varying degrees of detail.**

After the 2002 buildable lands reports were produced, several cities and counties adopted reasonable measures to address inconsistencies between actual development and their comprehensive plan policies. However, CTED found that the city or county legislative actions adopting these measures typically did not make clear that the actions were adopted as reasonable measures, nor did they describe how the city or county planned to monitor the progress made in addressing inconsistencies.

CTED's examination of county-wide planning policies and other adopted policies also found, in general, that specific roles and responsibilities between the counties and the cities are not clearly defined with regards to developing reasonable measures.

**Roles and responsibilities between the county and its cities for identifying the need for, and adoption of, reasonable measures:** Three of the six counties had information in their county-wide planning policies about corrective action in the form of reasonable measures. The other three counties have documented parts of the program but leave out important pieces.

**Monitoring the effectiveness of reasonable measures:** The Central Puget Sound Growth Management Hearings Board stated that the expansion of the UGA is the last option in accommodating growth.<sup>6</sup> However, little overall guidance is provided in county-wide planning policies on how counties and cities determine the effectiveness of reasonable measures. The public and the overall planning process would benefit from clear criteria for determining when measures have been effective.

**FINDING 5: Different GMA deadlines do not allow the full use of buildable lands report data in policy decisions.**

Respondents to the stakeholder survey stated that the county's buildable lands reports have been a useful tool in monitoring growth. However, most felt that improvements in use of data would occur if the timing of the reports were better coordinated with major comprehensive plan updates required in statute<sup>7</sup> or statutory urban growth area boundary reviews,<sup>8</sup> to inform plan updates.

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<sup>6</sup> Kitsap Citizens for Rural Preservation and Suquamish Tribe v. Kitsap County, Page 21

<sup>7</sup> RCW 36.70A.130

Buildable lands reports are required every five years, comprehensive plan updates are required at least every seven years, and the UGA is reviewed every 10 years. To illustrate this point, the next comprehensive plan update is due 2011 while the next buildable lands report is due 2012, one year *after* that update. The deadline for adoption of reasonable measures is the next comprehensive plan update<sup>9</sup>. That means the 2007 report's findings would be implemented by 2011, and the 2012 report's findings would be implemented by 2018.

Counties, cities, and their stakeholders would benefit from a more coordinated schedule for comprehensive plan updates and the UGA review. This would allow the timely inclusion of the buildable lands data and reasonable measures into the comprehensive plan and urban growth area updates. Legislative action would be necessary to change these statutory timelines.

**FINDING 6: Counties and cities have made an effort to involve the public and stakeholders in the buildable lands process. However, the results have been uneven, and improvements could be made to enhance transparency and opportunities for input.**

The five-year buildable lands report could provide the opportunity for enhanced access to the overall program for the public and policy makers. The report could act as a roadmap on where to access the different steps of the program.

For instance, the topic of dispute resolution is specifically required to be addressed in buildable lands programs. However, in some cases it was difficult to identify specific provisions for dispute resolution during CTED's review of buildable lands reports and county-wide planning policies. In some cases the responsibility may be with a regional planning body, but finding an explicit policy identifying that group is not an easy path. A buildable lands report could include an introduction summarizing the buildable lands process. While it would not need to include all of the policies, it could direct the reader to their source.

Additionally, the report could help the reader navigate the relationships between the agencies and their roles and responsibilities. Clearly delineating these relationships will help increase understanding and utilization of the program.

A guiding principle of the GMA is to broadly disseminate information to ensure the public's early and continuous participation. Buildable lands reports represent an important opportunity to keep the public informed about every step of the process.

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<sup>8</sup> RCW 36.70A.110

<sup>9</sup> Seattle King County Association of Realtors v. King County, CPSGMHB Case No. 04-3-0028, Final

## RECOMMENDATIONS

To address issues and opportunities identified in the findings of this report, CTED recommends the following:

### Policy Issues for Potential Consideration by the 2009 Legislature or CTED Rulemaking:

CTED will convene a group of stakeholders, using existing agency resources, to study the following issues and recommend clarifications through legislation in 2009 or agency rulemaking, as appropriate:

- 1. Clarify the key decision criteria in identifying inconsistencies between what was envisioned in the comprehensive plan and actual development.**

Legislative action or rulemaking would clearly establish the intent of the buildable lands statute in three areas: the point where the determination of inconsistency is made, at what jurisdictional level, and the criteria for the decision.

- 2. Coordinate the timing of comprehensive plan deadlines with those of the buildable lands reports and urban growth area reviews.**

Legislative adjustment of these three GMA deadlines to better correspond with one another would create a logical flow of information and processes.

### Procedural Issues to be Addressed by CTED:

CTED will convene a group of stakeholders, using existing agency resources, to address these issues in a new set of agency guidelines:

- 3. Develop guidelines to increase the transparency of the program that address, but are not limited to, the following:**
  - a. Roles of the city and county in developing the buildable lands report, conducting the consistency evaluation, and the establishment of reasonable measures.
  - b. Identify dispute resolution procedures.
- 4. Develop agency guidelines on establishment of a reasonable measures implementation and monitoring program.**

Both cities and counties are responsible for adopting and carrying out a reasonable measures program, if indicated by their evaluation of inconsistencies. CTED will develop guidelines through a collaborative process based on a review of current practices.

## Conclusion: Translating Knowledge into Action

This report's recommendations address the four key steps of the Buildable Lands Program described on page 5. Counties and cities have implemented the requirements of the Buildable Lands Program. With continued state funding to support the local programs, these recommendations will enhance their ability to carry out each of the four steps of the program.

- Step 1:** Program establishment: Clearly defined roles and responsibilities are essential in order to establish a fully functional program framework. *Recommendation 3.*
- Step 2:** Improved timing: Coordinated timing of all GMA planning processes will allow jurisdictions to more effectively measure whether their comprehensive plans are being implemented as they were envisioned. *Recommendation 2.*
- Step 3:** Plan review: Clarification on how to determine consistency between planned and actual development would enhance the ability of cities and counties to review the performance of their comprehensive plan policies. *Recommendation 1.*
- Step 4:** Corrective action: Establishing best practices for the successful implementation of reasonable measures will increase the consistency between actual development and comprehensive plans. *Recommendation 4.*

Over the last ten years the Buildable Lands Program has matured into an effective tool for measuring growth. As the program moves forward, counties and cities have an opportunity to develop a more robust process for review of buildable lands reports. Doing so will help translate this knowledge into actions that enhance communities' evaluation of the success of their comprehensive plans.

# APPENDICES

## Appendix A: Study Methodology

**Overview:** CTED examined the county reports submitted in 2002 and 2007, and collected stakeholder feedback. Consultants were commissioned to examine the process. Measurement tools were developed, including a quantitative assessment of the reporting process and a qualitative assessment based on stakeholder feedback about buildable lands reports. The feedback process involved planners, elected officials, and parties interested in the land use process. After review of all materials, CTED prepared a technical report on the Buildable Lands Program containing detailed information. This report, which is available at [www.cted.wa.gov/growth](http://www.cted.wa.gov/growth), was used as a basis for this policy paper.

**Quantitative method:** Finding meaningful numeric measures was challenging. The data and processes are locally defined, and there is natural variation of what is measured and measurement units. Depending on county and city size as well as the tools employed, the data may be specific down to the plot level, or only the general zoning area. There is also variation in the number of zoned areas reported within each jurisdiction. Comparisons between jurisdictions are difficult because of divergent reporting methods; this is important when comparing cities within a county. CTED, in concert with a consultant (AHBL, Inc.), created an 18-part measurement tool intended to evaluate the report data received from each county. Each report was evaluated against this tool to examine data quality and the usefulness of the process.

Summarizing the tool, there are five main areas of inquiry:

- Confirm the sufficiency of each report against statute and CTED guidelines.
- What is the data quality and are there process improvements?
- Do the collected data and the process used have value?
- County-level processes, cost, timing, and public participation.
- Were inconsistencies found?

**Process for studying qualitative questions:** A stakeholder survey was used to evaluate the Buildable Lands Program from other perspectives. The survey featured seven topic areas with multiple questions. Fourteen of the 21 stakeholders responded, including staff and elected officials from the reporting counties, and at least one city in each county, as well as representatives of outside stakeholder groups.<sup>10</sup>

Survey responses highlighting strengths and weaknesses of the reporting program are summarized below.

**Summary of feedback:** Many respondents provided positive feedback about the reports and the program. Four major themes occurred within the responses:

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<sup>10</sup> Thurston and Snohomish counties were not represented by responses, and Kitsap County government was represented only by a responder from a city within it (Bremerton). Jurisdiction staff was better represented among the responders (with six responses) than were elected officials (with two responses). Stakeholder groups were well represented, with four responses from the five groups queried.

- The buildable lands reports provide useful data for tracking growth.
- The requirements lead to standardization of monitoring.
- The requirements improved inter-jurisdictional communication.
- Achieved density may be the most useful information in the reports.

**Issues for further examination:** The respondents identified a number of issues where either the program or reports could be improved. These issues related to data collection and compilation processes, and shortcomings of the reports as the main tracking tool for GMA implementation.

- Timing of the report is an important issue. Changing the timing so it can inform required major comprehensive plan updates would result in greater efficiencies. One occurs every five years, the other every seven years.
- Many factors besides zoned densities impact development; including, the market, transportation, school district quality, job availability, construction costs, housing quality, and neighborhood quality, also affect what is built.
- The definition of “planned densities” is vague and problematic.
- Inconsistent methodology among jurisdictions can be a problem.
- Flexibility in methodology allows for variations due to differing conditions.
- Reporting of achieved densities may be inaccurate or skewed because:
  - It may not show the results of planned, new or recent changes in zoning;
  - For small jurisdictions, achieved and projected densities are not based on a large enough sample size.
- Reporting of land supply/capacity is difficult because market factors are hard to quantify and public use area deductions are difficult to verify.
- Employment data assumptions are areas of difficulty.
- Buildable Lands Program requirements add to the cost of local government.

## Appendix B: Access to County Buildable Lands Reports

Clark County 2002:

<http://www.clark.wa.gov/longrangeplan/review/buildable-lands.html>

Clark County 2007:

[http://www.clark.wa.gov/longrangeplan/review/documents/buildable\\_lands\\_report\\_2007.pdf](http://www.clark.wa.gov/longrangeplan/review/documents/buildable_lands_report_2007.pdf)

King county 2002:

<http://www.metrokc.gov/budget/buildland/bldlnd02.htm>

King County 2007:

<http://www.metrokc.gov/budget/buildland/bldlnd07.htm>

Kitsap County 2002:

[http://www.kitsapgov.com/dcd/community\\_plan/blr/final\\_bla.pdf](http://www.kitsapgov.com/dcd/community_plan/blr/final_bla.pdf)

Kitsap County 2007:

[http://www.kitsapgov.com/dcd/community\\_plan/blr/bla.htm](http://www.kitsapgov.com/dcd/community_plan/blr/bla.htm)

Pierce 2002, 2007 and associated appendices:

<http://www.co.pierce.wa.us/pc/services/home/property/pals/landuse/buildablelands.htm>

Snohomish county 2002:

[http://www.co.snohomish.wa.us/pdsapp/1000-SCT/Buildable\\_Lands/Index.asp](http://www.co.snohomish.wa.us/pdsapp/1000-SCT/Buildable_Lands/Index.asp)

Snohomish county 2007:

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