

**Land Use Capacity and Growth Targets:
A Tale of Two GMA Jurisdictions**

**Eric Laschever
Stoel Rives LLP
elaschever@stoel.com
(206) 386-7614**

- **GMA Provisions**
- **Board Rulings in Strahm Cases**
- **Observations and Practice Pointers**

- **Include areas and densities sufficient to permit” 20 year urban growth projection. Section 110.**
- **Provide sufficient land capacity to accommodate allocated housing and employment growth. Section 115.**
- **As part of 10 year review, revise plans to accommodate 20 year urban growth projection. Section 130.**
- **Compare assumptions to actual growth and development. Identify reasonable measures to accommodate growth. Section 215.**

- **Remands City plan to show more work**
 - **Break out City boundaries**
 - **Quantify effect of measures taken to address capacity**
 - **Revise plan if necessary**
- **Upholds County plan**

- Increase density by targeting FLUM density?
- Increase density by targeting actual density?

FLUM Density	Actual Density
20 units/acre	10 units/acre

- **Comprehensive plan must include future land use map that designates sufficient densities and intensities to accommodate any population and/or employment that is allocated. . .**

Hensley v. City of Woodinville, CPSGMHB Case No. 96-3-003 1, Final Decision and Order, (Feb. 25, 1997), at 9.

- **Local jurisdiction may not simply rely upon FLUM designations, absent a supporting and corroborative land capacity analysis, to discharge its .110 duty**
- **Especially in light of the Buildable Lands and Plan Update review and evaluation requirements.**

- **City's Land Use and Housing Elements have a high likelihood of erasing the capacity-population deficit**
 - **Including height reductions to address speculative blight**
- **City needs to quantify conclusion with a land capacity analysis**

- Upholds County's treatment of unbuildable land areas (rights-of-ways, stormwater detention)
- Concludes dwelling count remains same
- Upholds County's reliance on information from cities within jurisdiction regarding capacity

- **Increased sophistication in planning tools**
- **More detailed analysis required for complying with 110**
- **Potential for highly technical debates over number calculation**
- **Local governments “show your work”**
- **Petitioners build your record**
- **Affect beyond 215 jurisdictions?**