



APPENDIX B LAND CAPACITY & HOUSING TECHNICAL APPENDIX

This appendix details existing land capacity and housing conditions and needs in Bothell—including displacement risk and racially disparate impacts—and considers adopted targets in relation to existing capacity, barriers, and adequate provisions needed to address identified barriers. The document is organized as follows:

- **Section B.1 Inventory** includes a community profile (existing population, household, and workforce characteristics) as well an inventory of current housing units, production trends, and affordability.
- **Section B.2 Displacement Risk & RDI** includes a review of displacement risk and racially disparate impacts consistent with the requirements of HB 1220 and Commerce guidance.
- **Section B.3 Gap Analysis** considers current and future housing and employment needs and compares adopted targets to existing capacity. This section details methodology for the land capacity analysis.
- **Section B.4 Barriers Review** reviews existing barriers to housing at the various affordability levels based on prior production trends and the Commerce barrier checklists.
- **Section B.5 Adequate Provisions** identifies and documents appropriate programs and actions to meet housing needs and overcome identified barriers.



Definitions

Household: The U.S. Census Bureau defines a household as a group of people living within the same housing unit. This can be a person living alone, a family, or a group of unrelated people sharing a housing unit. Those living in group quarters, such as a college dormitory, military barrack, or nursing home, are not considered to be living in households. Households are further broken down as either family or nonfamily.



HUD: The U.S. Department of Housing and Urban Development (HUD). This is the entity responsible for federal housing programs, such as [Housing Choice Vouchers \(also known as Section 8 vouchers\)](#) which provide rental assistance. HUD sets income limits for metropolitan areas and counties across the country that determine eligibility for income-restricted housing units. HUD also sets thresholds to define terms such as “affordable” and “cost burden.”

Affordable Housing: House Bill (HB) 1220 and RCW 36.70A.030 define affordable housing as residential housing whose monthly costs, including utilities other than telephone, do not exceed thirty percent of the monthly income of a household whose income is:

- Rental housing: 60% of the median household income adjusted for household size, for the county where the household is located, as reported by the United States Department of Housing and Urban Development (HUD).
- Owner-occupied housing: 80% of the median household income adjusted for household size, for the county where the household is located, as reported by HUD.

Housing Affordability: In this appendix, “housing affordability” refers to the vision of a local housing supply that meets the needs of Bothell’s diverse community members and that they can afford without being cost burdened. HUD considers housing to be affordable if the household is spending no more than 30% of its income on housing costs, including utilities. Housing affordability can be accomplished through a mix of income-restricted housing and market-rate housing.

Median Household Income: Median household income is calculated based on the incomes of all households, including one-person households. As of 2021, the median household income in Bothell was estimated to be \$82,913 for renters, \$140,257 for homeowners, and \$116,578 across all households.¹

¹ ACS 5-Year Estimates (Table B25119), 2021.



Area Median Income (AMI): Refers to the HUD Area Median Family Household Income (HAMFI or AMI). Bothell is part of HUD's Seattle-Bellevue Metro Area, which includes all of King County and Snohomish County. AMI varies by household size. Income limits to qualify for affordable housing are often set relative to AMI. Below are examples of household incomes at 80%, 50%, and 30% AMI for Bothell based on 2021 HUD data—of note, the AMI for the Seattle-Bellevue, WA HUD Metro FMR Area increased to \$146,500 in 2023, a 27% increase from 2021 to 2023.

AMI Income Category	1 Person Household	2 Person Household	3 Person Household	4 Person Household
30% AMI (Extremely Low)	\$24,300	\$27,800	\$31,250	\$34,700
50% AMI (Very Low)	\$40,500	\$46,300	\$52,100	\$57,850
80% AMI (Low)	\$63,350	\$72,400	\$81,450	\$90,500

Source: [HUD 2021 income limits](#) for Seattle-Bellevue Metro Area, 2021.

Cost Burden and Severe Cost Burden: Households that spend more than 30% of their gross income on housing, including utilities, are considered “cost-burdened.” Households spending more than 50% of their gross income on housing, including utilities, are “severely cost-burdened.” Cost-burdened households have less money available for other essentials, like food, clothing, transportation, and medical care. The 30% and 50% thresholds are set by HUD.

Income-Restricted Housing: Refers to housing units that are only available to households with incomes at or below a set income limit and are offered for rent or sale at below-market rates.

Market-rate Housing: Housing whose cost is determined by the real estate market.



B.1 INVENTORY

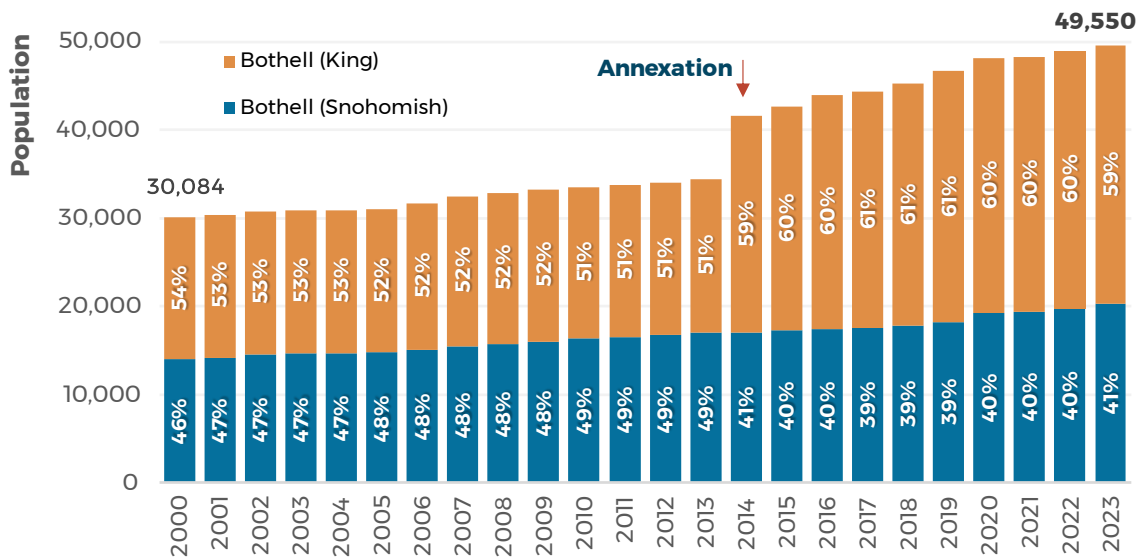
Community Profile

Population Characteristics

Total Population

Exhibit B-1 shows the city's population growth since the year 2000 divided by county. As of April 1, 2023, Bothell has an estimated population of 49,550 people according to the Office of Financial Management (OFM). Since the last major annexation in 2014, the city's population has increased 19%, with an average annual growth rate of 2.0%. This is higher than the growth rate in both King (1.7%) and Snohomish (1.6%) counties over this same period. The last major annexation in 2014 added 1,004 acres and 6,789 new residents to the city. After this annexation, about 60% of the population now lives in King County side and 40% in Snohomish County.

Exhibit B-1. City of Bothell Population (2000-2023)



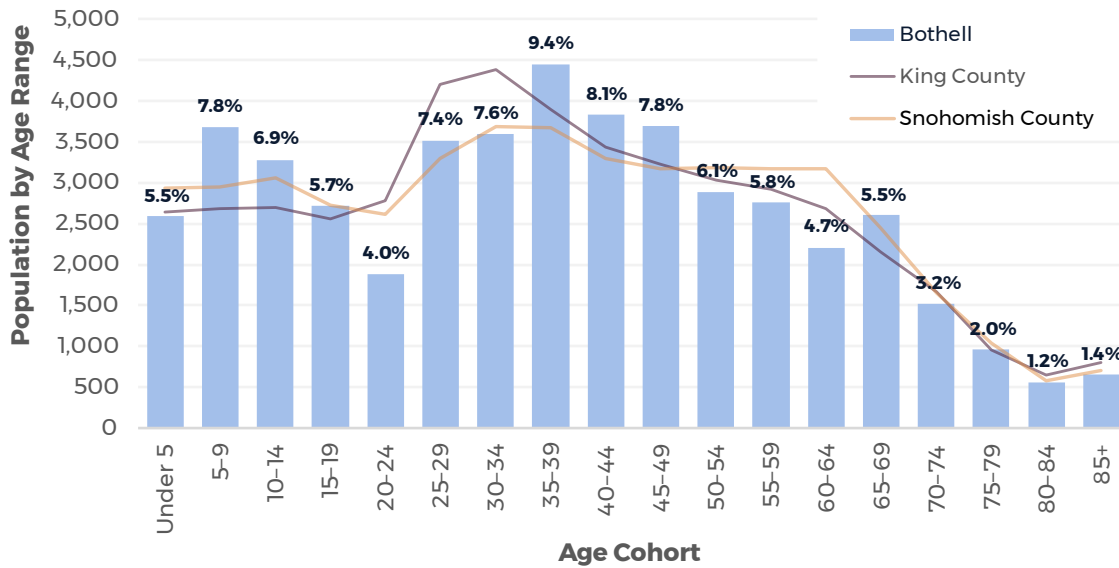
Sources: OFM, 2023; BERK, 2023.

Age

Age cohorts in Bothell are shown in comparison to those in King and Snohomish Counties in **Exhibit B-2**. When compared with the two counties, Bothell generally has a higher proportion of adults aged 35–45 and school-aged children aged 5–14, but a substantially lower proportion of residents aged 20–24. When compared with King County, Bothell also has a notably lower percentage of residents aged 25–34. Compared to 2010, Bothell now has higher concentrations of people in their 30s and 40s, children aged 10–19, and older adults in their 60s and 70s (**Exhibit B-3**).

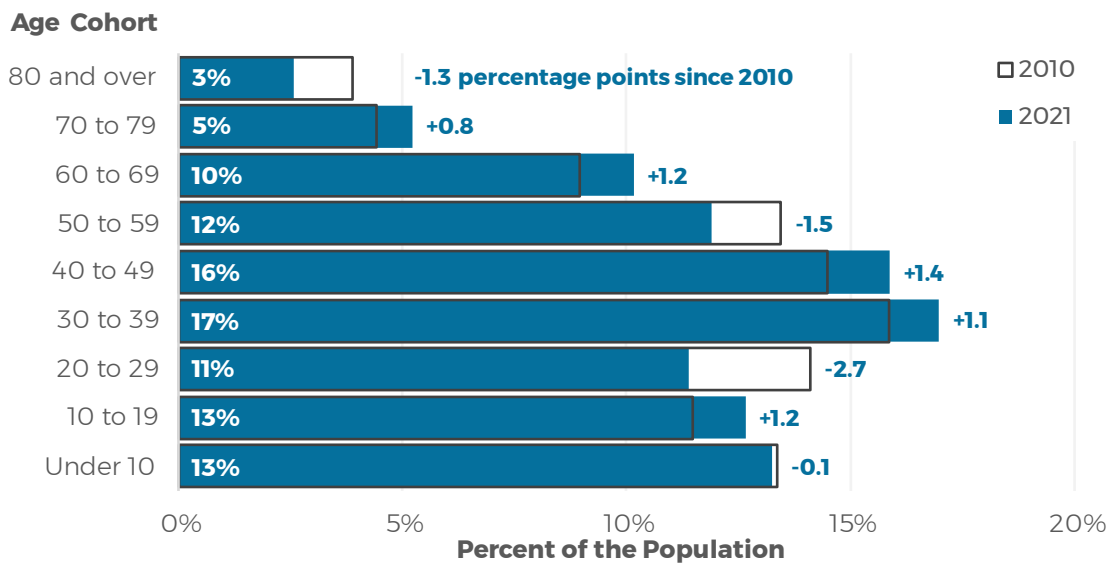


Exhibit B-2. Population Cohorts: City of Bothell and King and Snohomish Counties (2021)



Sources: ACS 5-Year Estimates (Table B01001), 2021; BERK, 2023.

Exhibit B-3. Population Cohorts for City of Bothell (2010 and 2021)



Sources: ACS 5-Year Estimates (Table B01001), 2010 and 2021; BERK, 2023.



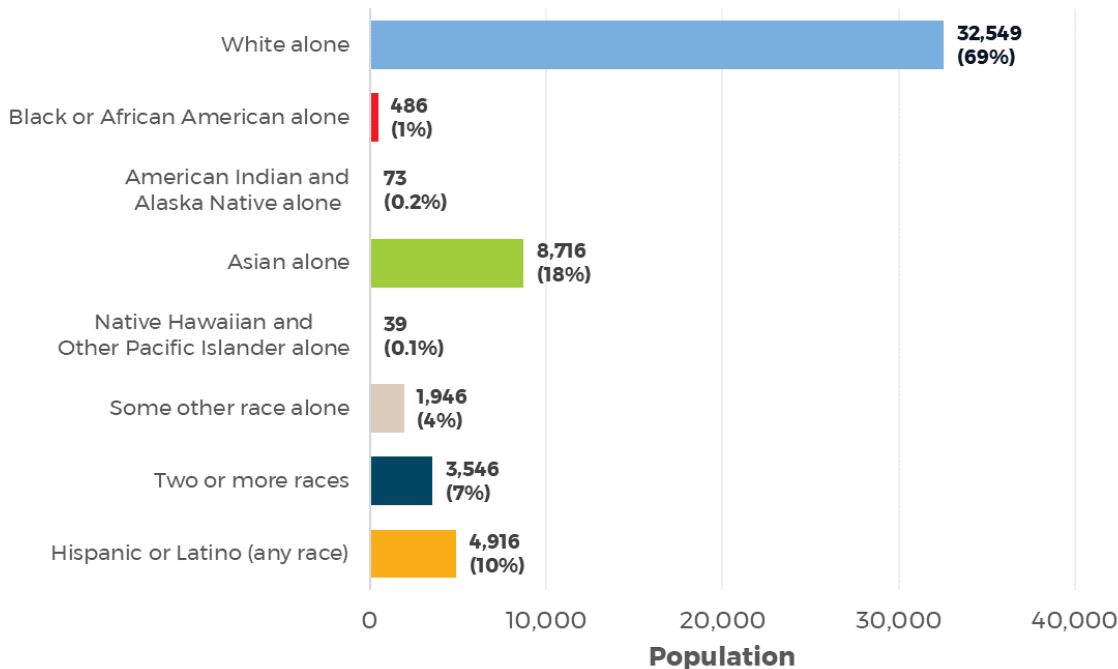
Race, Ethnicity, & Language Spoken at Home

Statistics about race and ethnicity of the city's population are provided in [Exhibit B-4](#), with comparisons provided to counties in [Exhibit B-5](#), and between 2016 and 2021 in [Exhibit B-6](#). By race, people of color represent about 31% of the population, with 10% identifying as Hispanic/Latino. The distribution of population by race as compared to the counties is generally similar, with a higher proportion of residents that are Asian alone (18%) than Snohomish County overall (12%), and a lower proportion of Black or African-American residents (~1%) than Snohomish (3%) or King (6%) counties. The intersection between equity and the distribution of racial and ethnic groups in the city is discussed in more detail under [Racially Disparate Impacts](#).

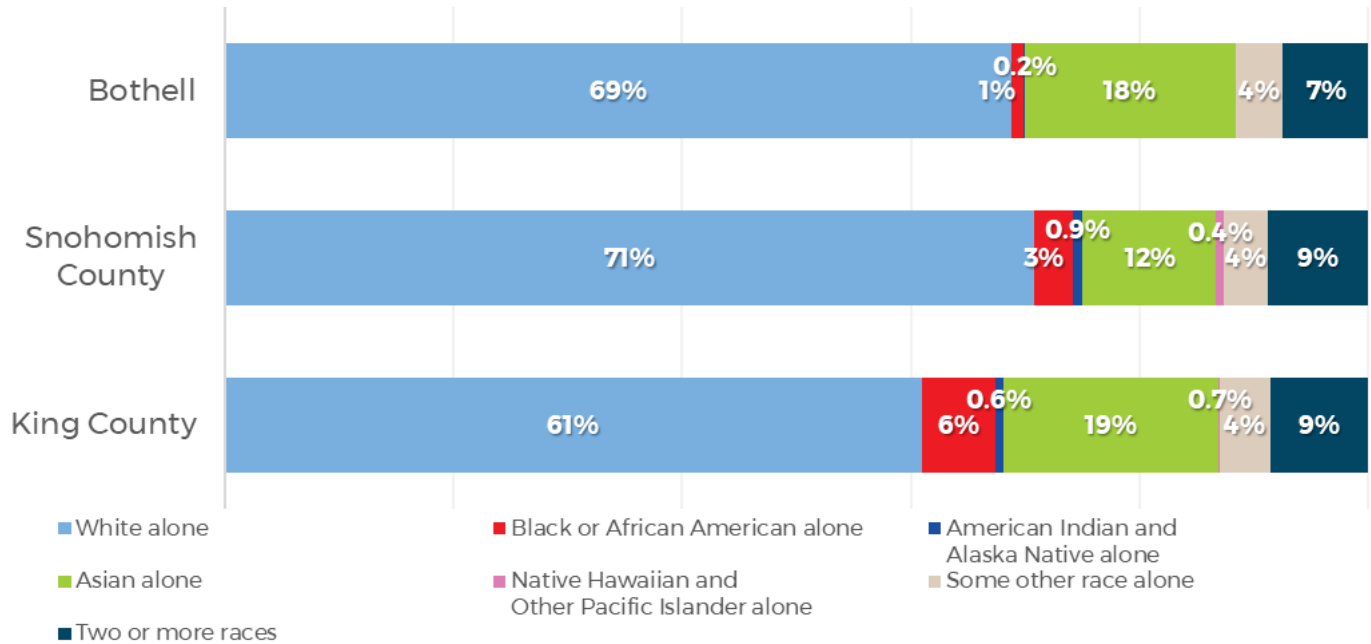
The past five years have also reflected significant change in the racial composition of the population. The proportion of residents defining themselves as “White alone” declined from 74% in 2016 to 69% in 2021, while people defined as “Asian alone” increased from 13% to 18% of the population. Note that self-identified Hispanic/Latino residents also increased by 1.8 percentage points from 8.6% in 2016 to 10.4% in 2021. See [Exhibit B-6](#).

A map providing the distribution of population, including identification by race and ethnicity, is included in [Exhibit B-7](#). The highest population densities in Bothell are concentrated in Downtown, Bloomberg Hill, Brickyard Road/Queensgate, and the southwest corner of Canyon Park that extends into Maywood/Beckstrom Hill. Other small pockets of more densely populated areas are scattered throughout other areas of Bothell, often coinciding with pockets of higher density residential housing typologies (see [Housing Inventory](#) below). Neighborhoods in Bothell with the highest population density are also the most racially and ethnically diverse.

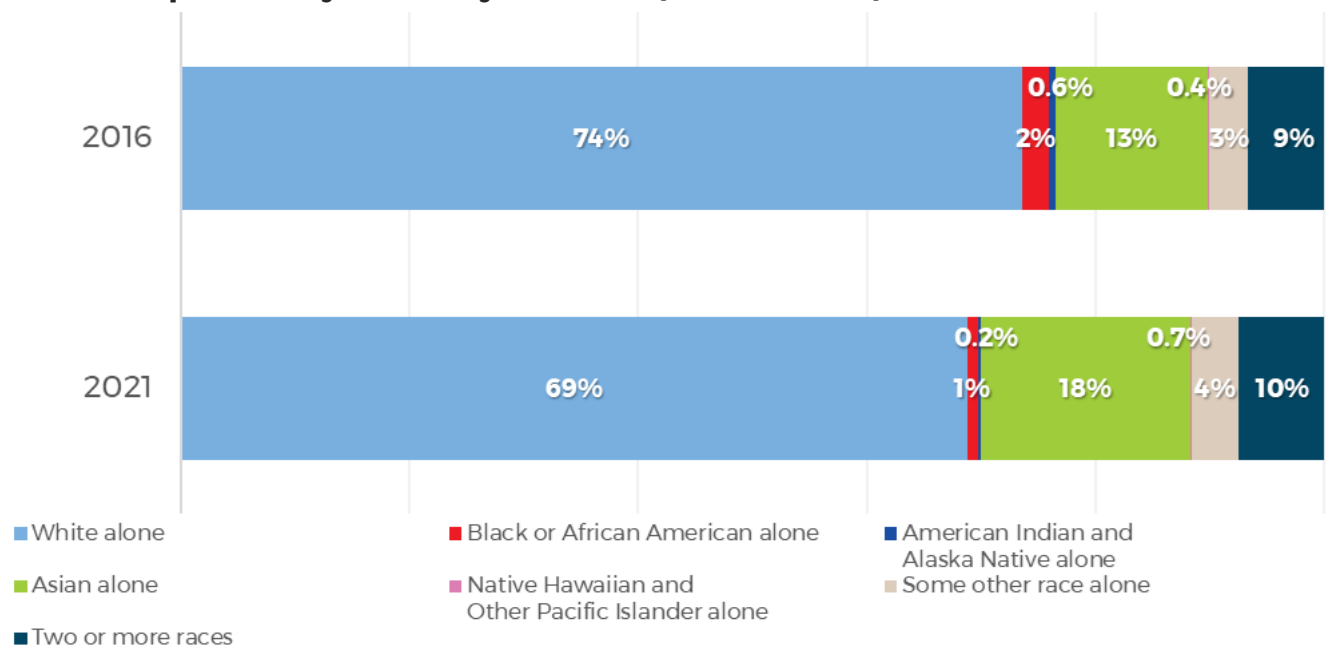
Exhibit B-4. Population by Race and Ethnicity—City of Bothell (2021)



Sources: ACS 5-Year Estimates (Table DP05), 2021; BERK, 2023.

**Exhibit B-5. Population by Race—City of Bothell and King and Snohomish Counties (2021)**

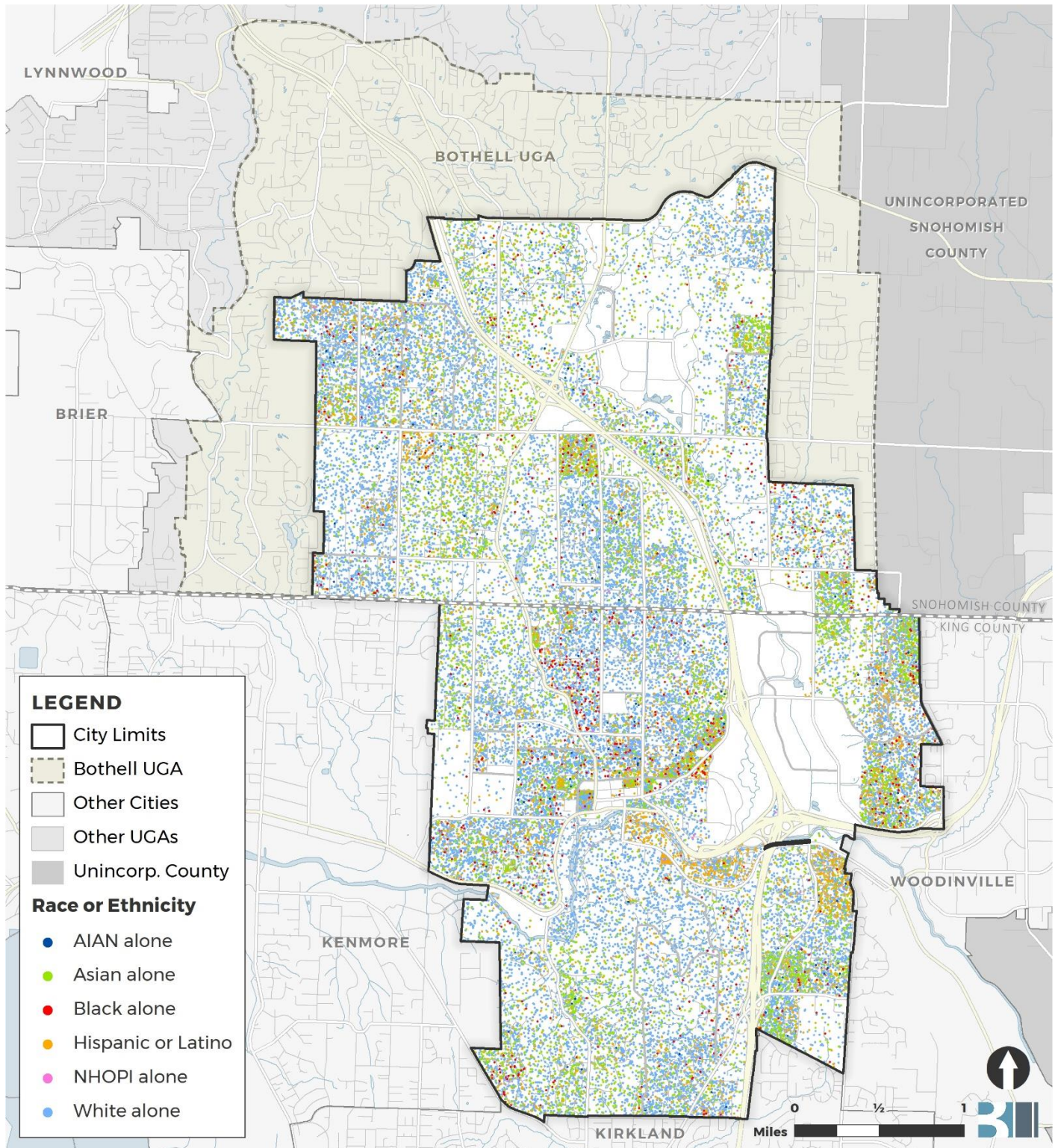
Sources: ACS 5-Year Estimates (Table DP05), 2021; BERK, 2023.

Exhibit B-6. Population by Race—City of Bothell (2016 and 2021)

Sources: ACS 5-Year Estimates (Table DP05), 2021; BERK, 2023.



Exhibit B-7. City of Bothell Population Density by Race and Ethnicity (2020)



Sources: US Decennial Census, 2020; City of Bothell, 2023; BERK, 2023.



The percentage of Bothell's population that speaks only English has decreased as the city's population has become more diverse. Approximately 82% of Bothell's population spoke only English in 2010 versus 73% in 2021. The percent of people that speak English less than "Very Well" increased slightly from 2010 and 2021 (6% versus 10% respectively), less than the change in only English speakers over the same timeframe (see **Exhibit B-8**). **Exhibit B-9** summarizes the language spoken at home for Bothell-area students. About 80% of students speak English at home, 6% speak Spanish, and less than 2% speak other languages, most notably Telugu and Chinese. About 1% of students speak Russian, Hindi, or Tamil at home.

Exhibit B-8. Percent of Population That Speak English Less Than "Very Well" (2010 and 2021)



Sources: ACS 5-Year Estimates, 2020 and 2021; BERK, 2023

Exhibit B-9. Language Spoken at Home for Bothell Area Public School Students (2022)

Language	Students	Percent
English	17,565	80%
Spanish	1,309	6%
Telugu	334	1.5%
Chinese (Unspecified)	305	1.4%
Russian	251	1.1%
Hindi	224	1.0%
Tamil	222	1.0%
Korean	208	0.9%
Portuguese	186	0.8%
Chinese (Mandarin)	172	0.8%

Note: This data only includes public school students at Northshore School Districts schools within 2 miles of Bothell city limits. It is an estimate of actual public school student counts based on the location of the public school relative to Bothell's city boundary.

Sources: Office of Superintendent of Public Instruction, 2022; BERK, 2023.

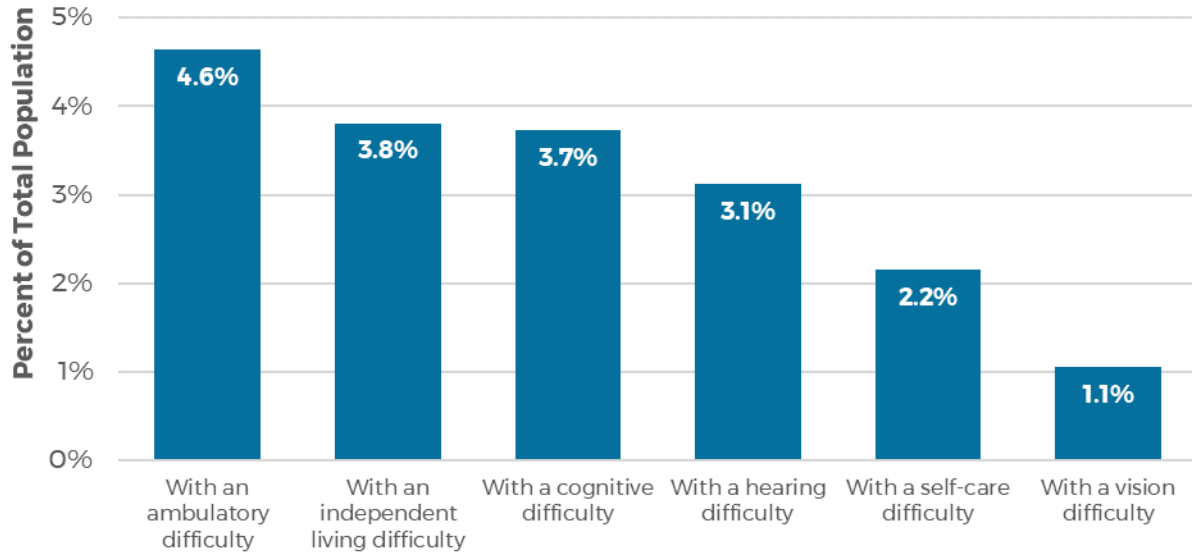
Disability Status

Approximately 9% of Bothell residents live with one or more disabilities. For the population with a disability in Bothell, the most common disability type is an ambulatory difficulty followed by an



independent living difficulty, cognitive difficulty, and hearing difficulty. See [Exhibit B-10](#). Note that these categories are not mutually exclusive as people may have more than one disability.

Exhibit B-10. Percent of Population With a Disability by Type (2022)



Note: Categories are not mutually exclusive. People could have one or more disabilities.

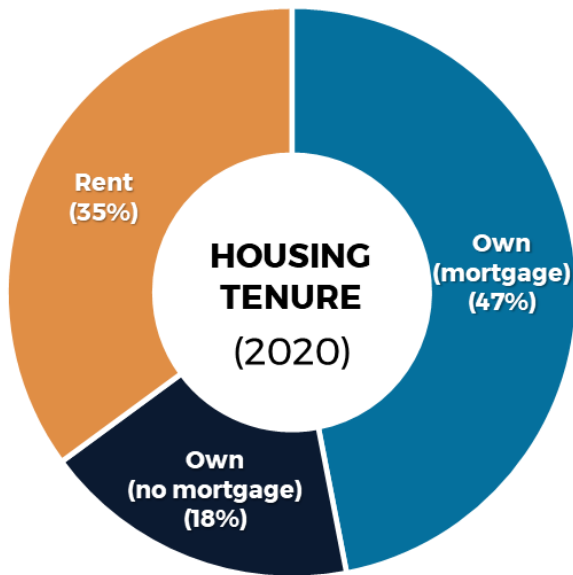
Sources: ACS 5-Year Estimates (Table S1810), 2022; BERK, 2023.

Household Characteristics

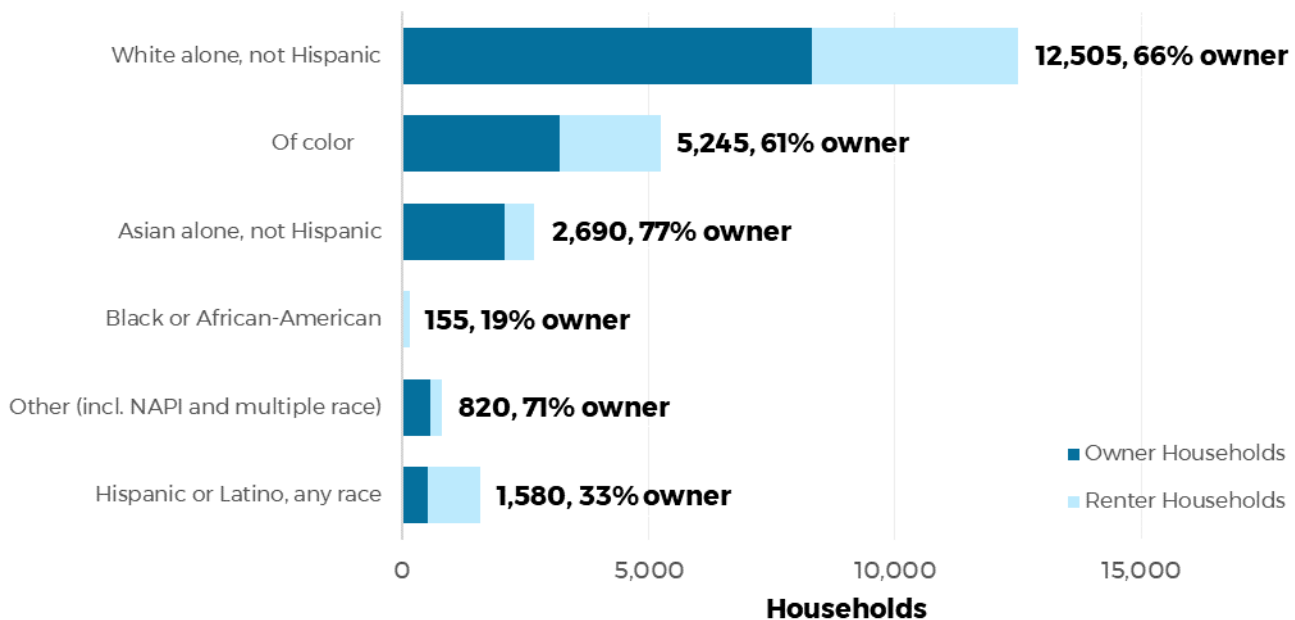
Household Count, Size, & Tenure

As of 2022, there were an estimated 19,530 households living in the City of Bothell and 12,086 in the unincorporated MUGA.² [Exhibit B-11](#) shows the breakdown of households in the City of Bothell by tenure as of 2020. Nearly two-thirds of all households owned their homes, and most of these households had a mortgage. Just over one-third of households were renters. Homeownership rates were slightly lower among household of Color with the lowest rates of ownership among Black and Hispanic/Latino households (see [Exhibit B-12](#)).

² Source: OFM, Postcensal Estimates of Housing Units, April 1, 2020 to April 1, 2023; OFM Estimates of Total Housing Units for the Unincorporated Portion of Urban Growth Areas, 2022.

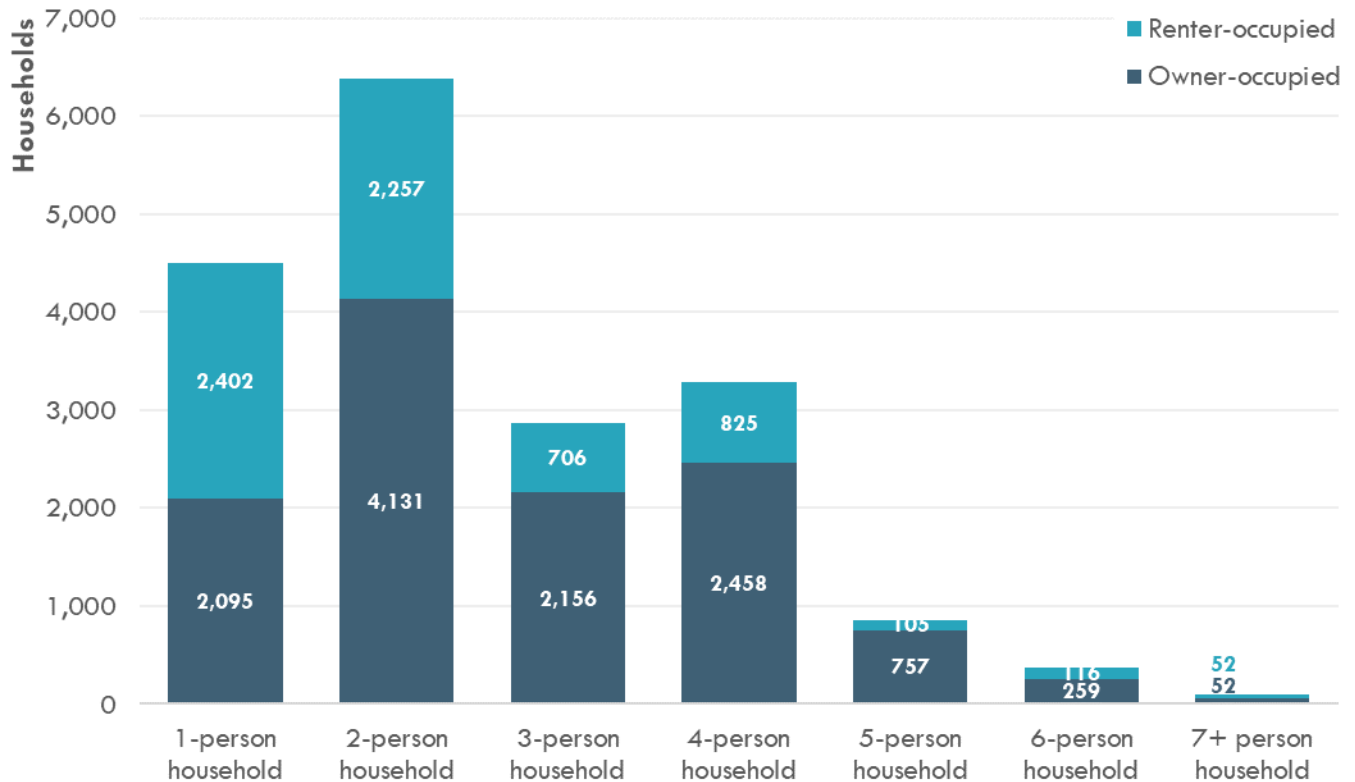
**Exhibit B-11. City of Bothell Households by Tenure (2020)**

Sources: HUD CHAS data (based on 2016-2020 ACS 5-year estimates); BERK, 2023.

Exhibit B-12. City of Bothell Households by Tenure and Race (2020)

Sources: HUD CHAS data (based on 2016-2020 ACS 5-year estimates); BERK, 2024.

Exhibit B-13 breaks down all households in the City of Bothell by size and tenure. About 59% of all households in Bothell have either 1 or 2 members, while the remainder have 3 or more. Renter households are more likely to be smaller in size. However, there are many small owner-occupied households and larger renter-occupied households.

**Exhibit B-13. City of Bothell Households by Size and Tenure (2021)**

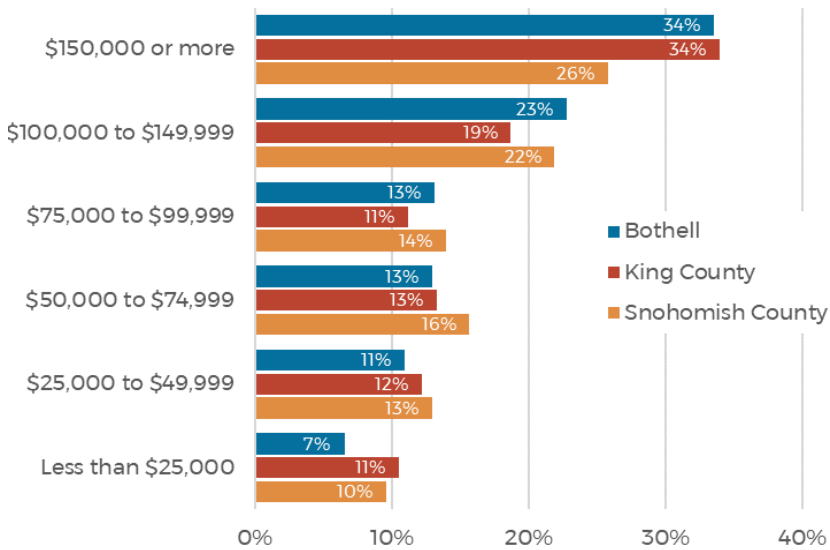
Source: ACS 5-Year Estimates, 2021; BERK, 2023.

Household Income

As of 2021, the ACS median household income in Bothell was \$116,578, which was 9.6% higher than all of King County (\$106,326) and 21.9% higher than all of Snohomish County (\$95,618). The graph in [Exhibit B-14](#) show the proportion of households at various income brackets in Bothell, King County, and Snohomish County. Bothell has a similar proportion across brackets as King County, although has fewer households earning less than \$25,000 and more households earning \$100,000 to \$149,999. The proportion of households earning \$150,000 or more has increased 20% since 2010 ([Exhibit B-15](#)). There are also fewer households in the lowest three income brackets than there were in 2010.



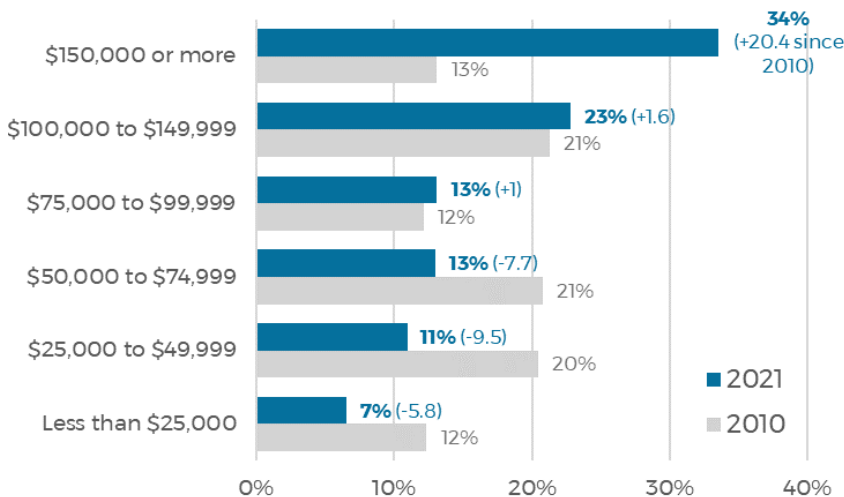
Exhibit B-14. Distribution of Households by Household Income Level in Bothell and King and Snohomish Counties (2021)



Note: Not adjusted for inflation

Sources: ACS 5-Year Estimates (Table B19001), 2021; BERK, 2023.

Exhibit B-15. Change in Distribution of Households by Household Income Level (2010 to 2021)



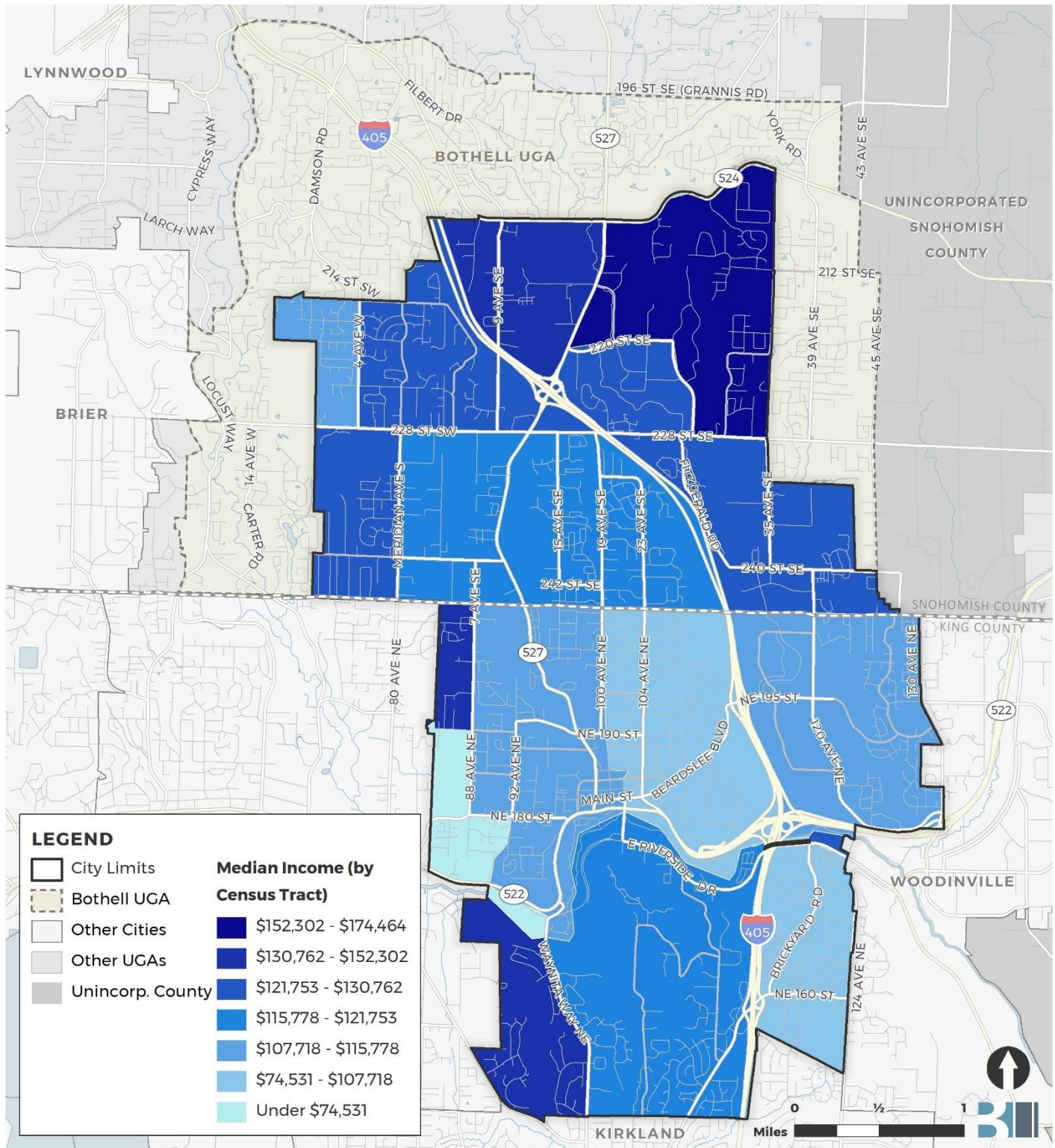
Note: Not adjusted for inflation

Sources: ACS 5-Year Estimates (Table B19001), 2010 and 2021; BERK, 2023.

Exhibit B-16 maps the geographic distribution of median household income in Bothell by Census tract. Areas with the highest household income are generally concentrated closer to the edges of the city, with lower incomes northwest and southeast of the I-405 / SR 522 interchange and to the north and surrounding SR 522 in the west. The high median household incomes in the northern area of Bothell (also an area of low-density), the northside of the Westhill neighborhood, and the west side of the Waynita/Simonds/Norway Hill neighborhood are examples of this. The Census tract with the lowest median household income is directly south of one of the highest income areas in the Westhill neighborhood (generally south and west of Bothell High School).



Exhibit B-16. Median Household Income by Census Tract in Bothell (2021)



Sources: ACS 5-Year Estimates (Table B19013), 2021; City of Bothell, 2023; BERK, 2023.



The 2022 HUD Median Family Income (also known as Area Median Income, or AMI) in the Seattle metropolitan area (which includes Bothell) was \$134,600. To evaluate housing affordability, HUD groups households by income level relative to AMI. The income limits used to group households by income level are adjusted for household size. **Exhibit B-17** presents the percentage of all households by income level relative to AMI and by tenure. It shows significant income disparities between owner and renter households, with a much higher percentage of owner households having incomes above AMI.

HUD AREA MEDIAN FAMILY INCOME (AMI) VS. ACS MEDIAN HOUSEHOLD INCOME

When summarizing housing affordability by income level, households are typically grouped relative to the U.S. Department of Housing and Urban Development (HUD) Area Median Family Income (HAMFI or AMI). Income groups are typically defined as follows:

- Extremely Low Income: $\leq 30\%$ AMI
- Very Low Income: 30-50% AMI
- Low Income: 50-80% AMI
- Moderate Income: 80-100% AMI
- Above Median Income: $>100\%$ AMI

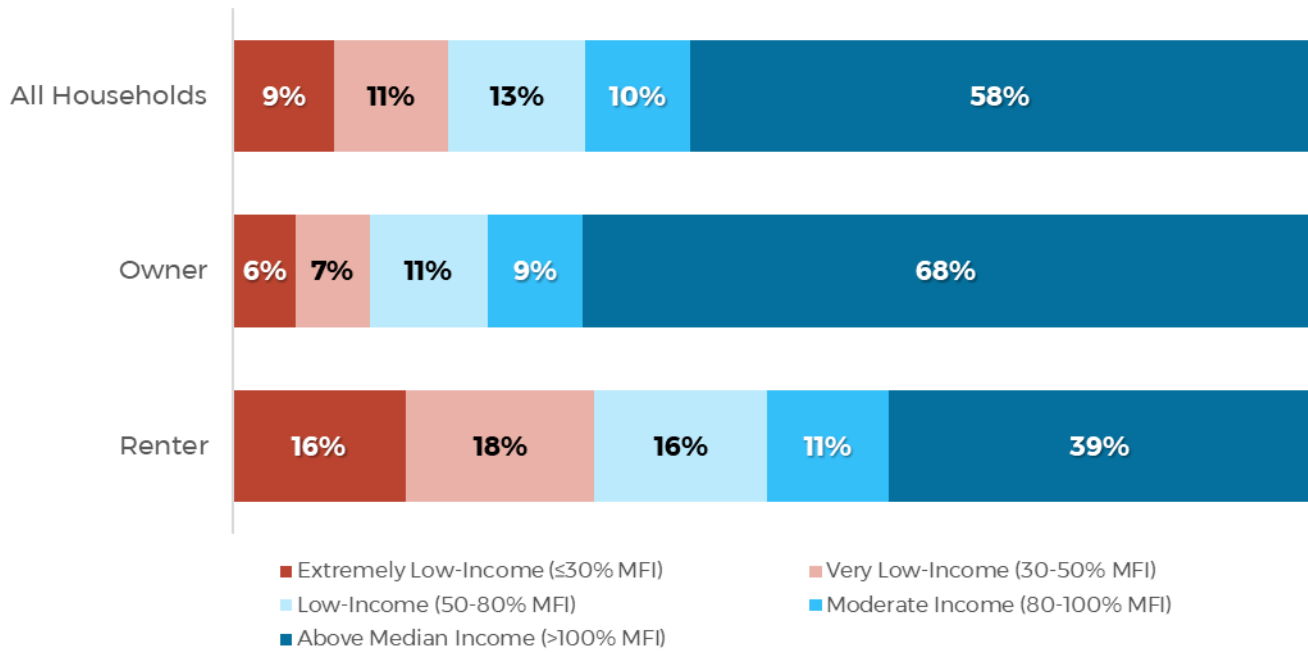
King and Snohomish counties are both part of the Seattle-Bellevue, WA HUD Metro Fair Market Rent (FMR) Area. In 2021, AMI for the Seattle-Bellevue, WA HUD Metro FMR Area was \$115,700. HUD also publishes Consolidated Planning/Comprehensive Housing Affordability Strategy (CHAS) data which groups households by income level relative to AMI. These data include adjustments to account for differences in household size to reflect the fact that the living expenses for a 1-person household are significantly less than those of a family of four. Income limits to qualify for affordable housing are often set relative to AMI.

The ACS estimates median household income specific to Bothell and King and Snohomish counties but does not present household counts by income level relative to AMI. Instead, the ACS provides income based on categories by dollar amounts without adjustment for household size—AMI takes into account household size while AMI is based on the median income for a four-person family household.

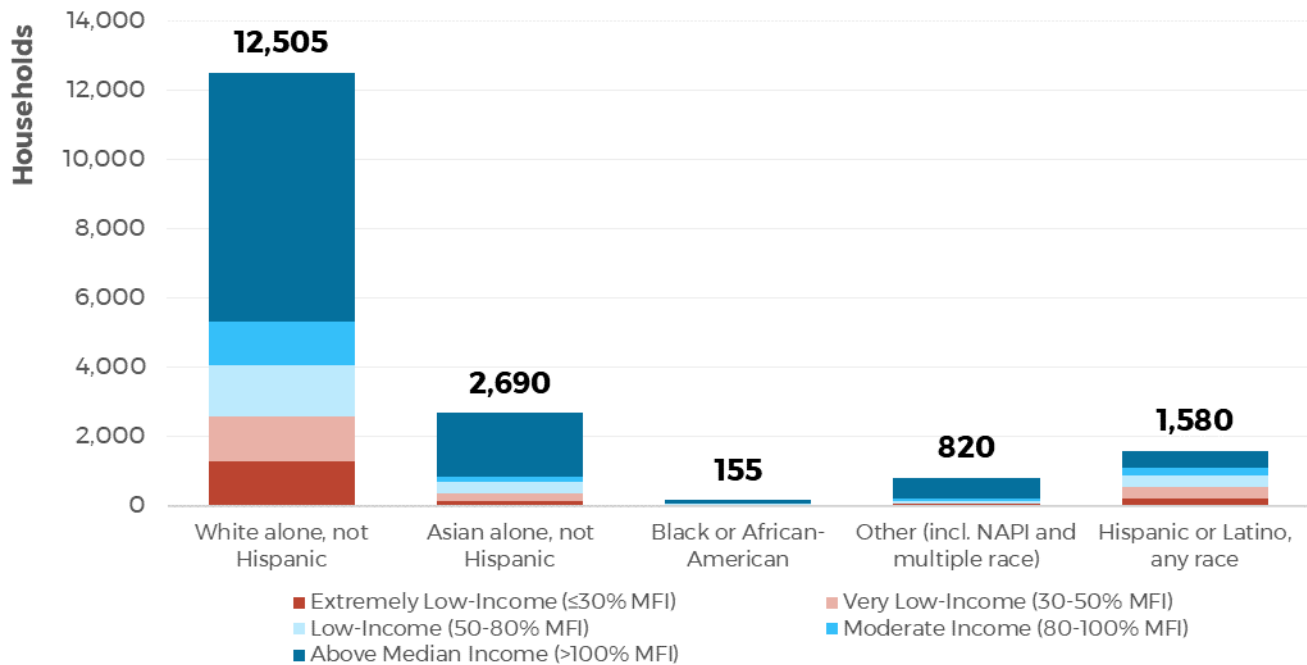
Of note, the AMI for the Seattle-Bellevue, WA HUD Metro FMR Area increased to \$134,600 in 2022 and \$146,500 in 2023, a 27% increase from 2021 to 2023. ACS median household income is not available for Bothell or the counties past 2021 but has likely increased as well.

Source: [HUD Income Limits](#), 2021 and 2023; BERK, 2023.

Exhibit B-18 breaks down household income by race. Looking at household income by race helps identify potential communities at risk of displacement with new housing growth. Bothell's households are about 70% White and 30% of Color. When breaking down by racial categories, Asian and Hispanic/Latino households are the largest racial minority groups in the City. When looking at income distribution by each racial category, there is not a huge discrepancy between White Households and those of Color. However, when looking at individual groups, Hispanic/Latino households have a higher percentage of extremely low- and very low-income households. Black households have a higher percentage of very low-income and moderate-income households. Households who identify as other (including multiple race) or Asian have the highest percentage of above median income households of all racial groups in Bothell. See **Exhibit B-19** for the breakdown.

**Exhibit B-17. All Households by Tenure and Income Level (2020)**

Sources: HUD CHAS data (based on 2016-2020 ACS 5-year estimates); BERK, 2023.

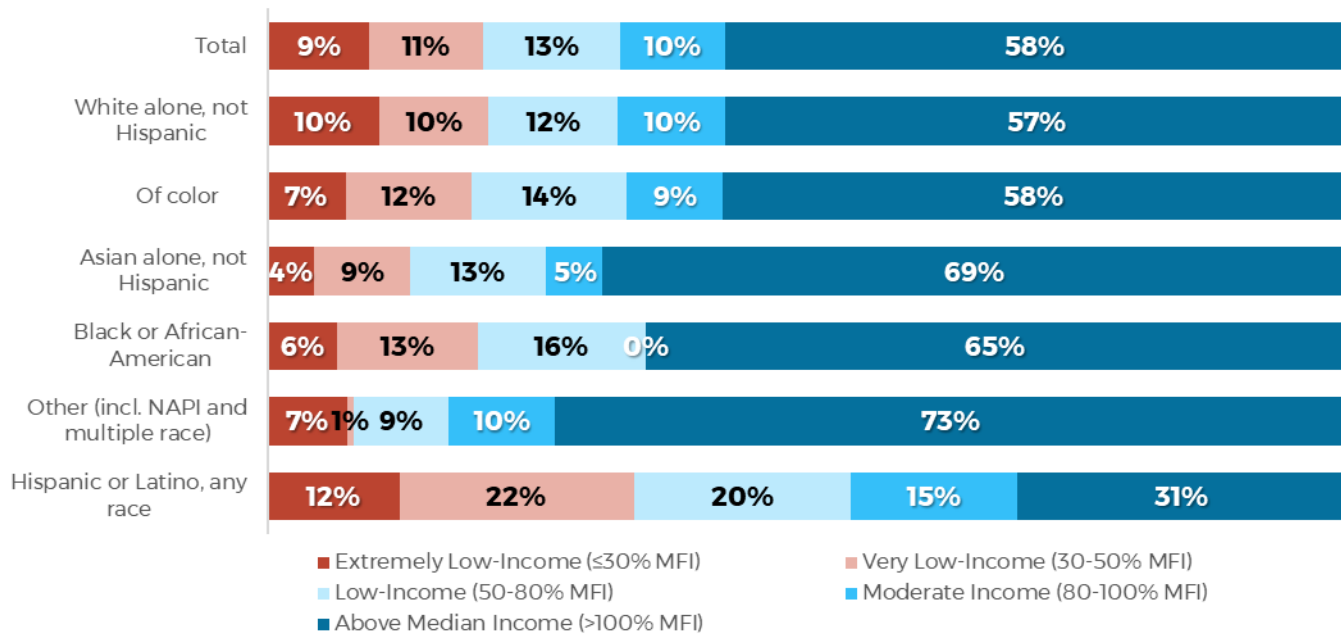
Exhibit B-18. All Households Income Category Distribution by Race (2020)

NAPI = Native American or Pacific Islander.

Source: HUD CHAS data (based on 2016-2020 ACS 5-year estimates); BERK, 2023.



Exhibit B-19. Household Income Distribution by Race and Ethnicity (2020)



NAPI = Native American or Pacific Islander.

Source: HUD CHAS data (based on 2016-2020 ACS 5-year estimates); BERK, 2023.

Workforce Profile

As of 2022, there were an estimated 32,421 jobs under “covered employment” in Bothell based on estimates provided by the PSRC.³ Local covered employment by major sector is provided in [Exhibit B-20](#), with local employment growth by sector provided in [Exhibit B-21](#).

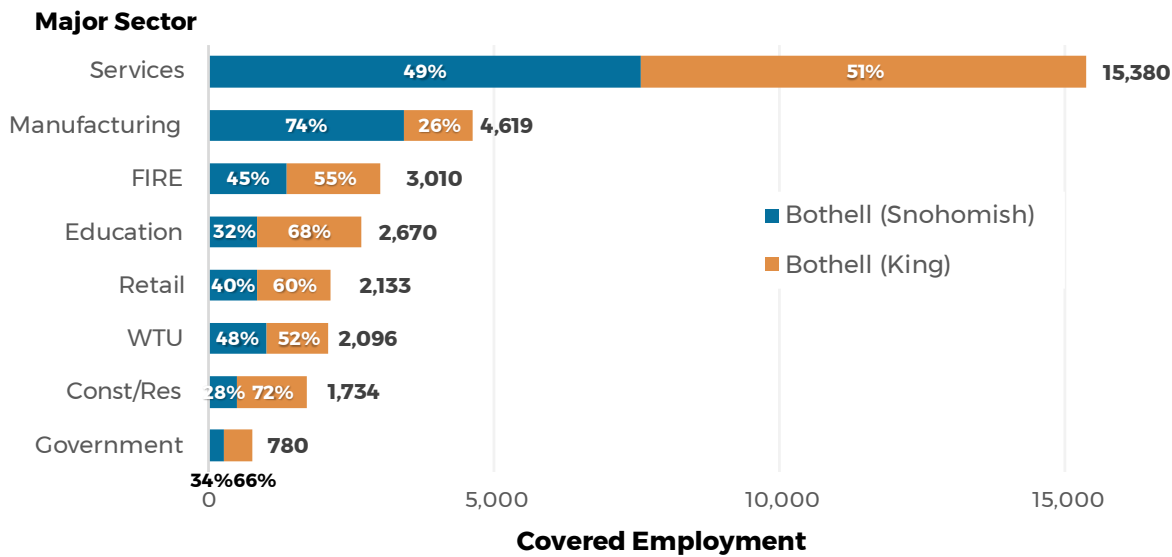
This dataset highlights that the services sector accounts for 15,380 of the estimated 32,421 jobs in Bothell, or about 47% of total employment. The next largest employment sectors are manufacturing (13%) and finance, insurance, and real estate (FIRE; 10%). Since 2012, employment has grown at an average of 2.0% per year.

In these figures, note that “covered employment” references those jobs that are covered under state unemployment insurance. This definition specifically excludes self-employed workers, proprietors, and other non-insured workers. Because of this, these figures typically represent 85–90% of total local employment. This also includes part-time and temporary employment, meaning that multiple jobs held by a single person will all show up in the data.

³ “Covered employment” includes all jobs where unemployment insurance from an employer would apply. Because this information is based on unemployment insurance data, these figures do not include the self-employed, proprietors, corporate officers, military personnel, and railroad workers. These figures are based on unemployment insurance data received from the Washington State Employment Security Department (ESD) based on the Quarterly Census of Employment and Wages (QCEW). For more information, see the PSRC’s Employment Data Series memo.



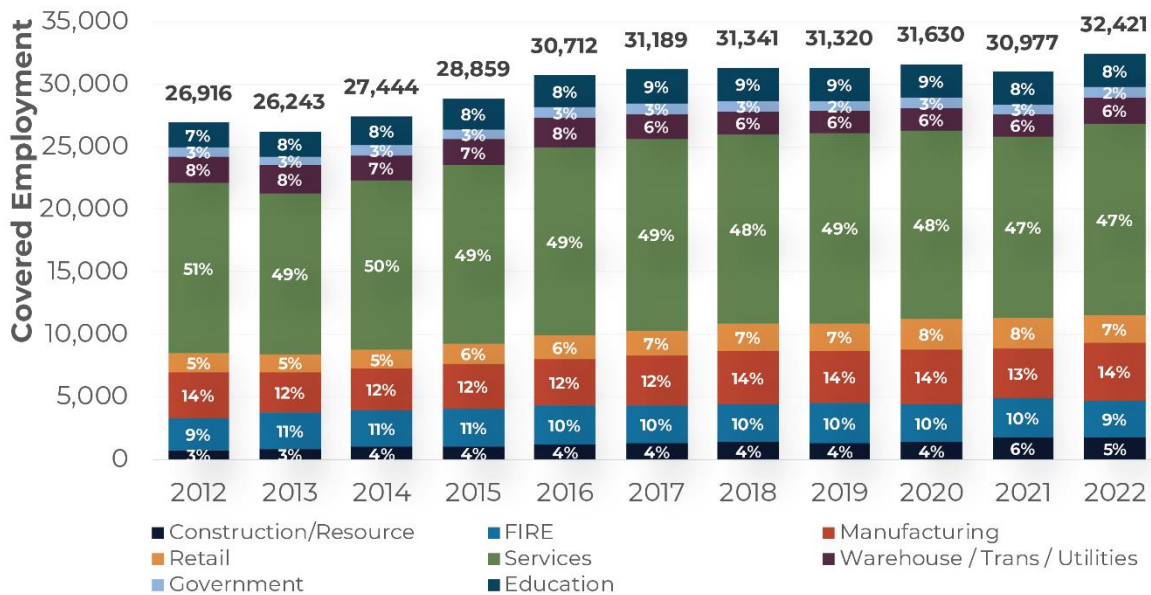
Exhibit B-20. Bothell Employment by Major Sector and County Location (2022)



Note: WTU = Warehousing, Trade, and Utilities; Const/Res = Construction and Resources; FIRE = Finance, Insurance, and Real Estate.

Sources: PSRC Covered Employment Estimates, 2023; BERK, 2023.

Exhibit B-21. Bothell Employment by Major Sector (2012-2022)



Note: FIRE = Finance, Insurance, and Real Estate.

Sources: PSRC Covered Employment Estimates, 2023; BERK, 2023.

An assessment of location quotients as compared to the four-county PSRC region is included in [Exhibit B-22](#). Examining the location quotients of local employment can be important to examine the relative concentration of the jobs by sector. Location quotients are determined as the ratio between the proportion



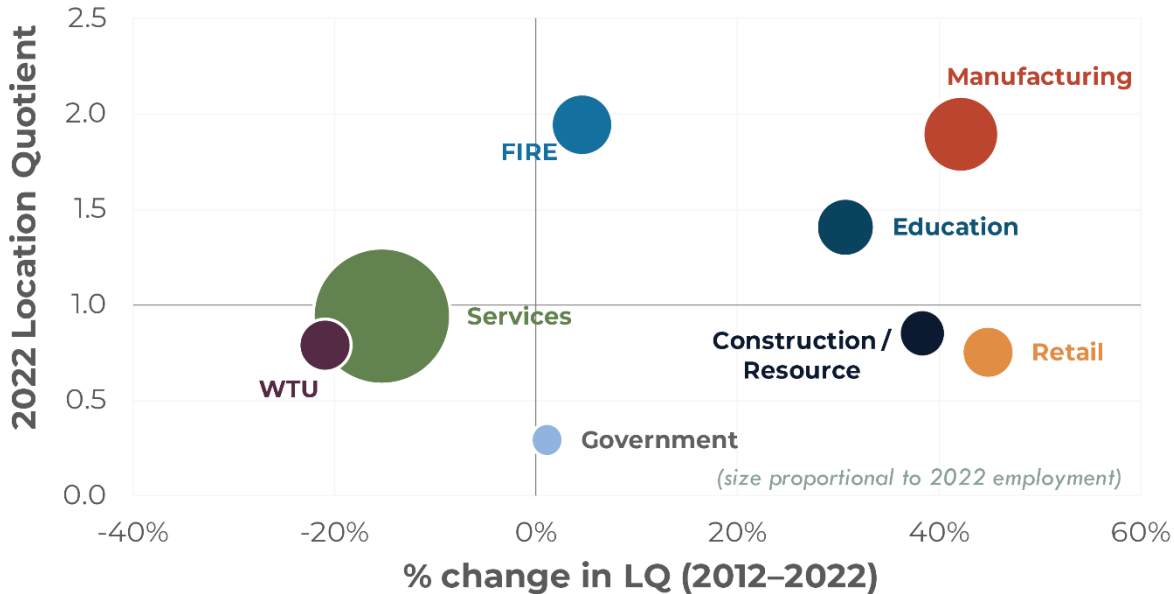
of local employment in certain sectors versus the proportion of regional employment in these sectors. With respect to the data provided in **Exhibit B-22**:

- The **location quotients** for each major sector are given on the y-axis. If these values are more than one, the city has a greater concentration of employment in these sectors than average.
- The **changes in location quotients** between 2012 and 2022 are given on the x-axis. If this value is positive, it suggests that employment in this sector is becoming more concentrated than the regional average over time.
- The sizes of the bubbles in the chart represent the **amount of employment** in each major sector and are provided for comparison.

While employment in services takes up the largest proportion of total employment, this major sector has a location quotient of less than one (0.94) and has been declining in concentration in comparison to other sectors over the past decade (-15% since 2012). Warehousing, trade, and utilities has also declined in concentration (-21% since 2012), and there is a substantially lower (albeit stable) concentration of government employment than the regional average in Bothell (LQ 0.29).

Conversely, FIRE (with a location quotient of 1.94), manufacturing (LQ 1.91), and education (LQ 1.41) are over-represented in local employment over the regional average. In terms of changes in concentration since 2012, there has been increasing concentrations of employment in retail (+45% LQ between 2012 and 2022), manufacturing (+42%), construction/resource (+38%), and education (+31%) are growing in local concentration.

Exhibit B-22. Bothell Location Quotients by Major Sector (2022)



Note: WTU = Warehousing, Trade, and Utilities; FIRE = Finance, Insurance, and Real Estate.

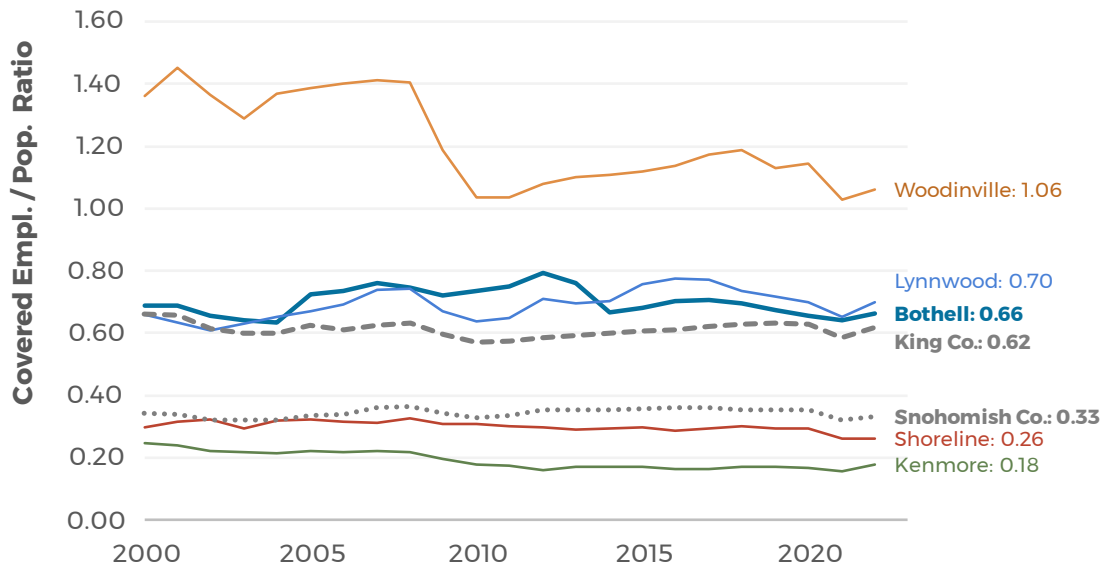
Sources: PSRC Covered Employment Estimates, 2023; BERK, 2023.

Exhibit B-23 provides information about the ratio between covered employment and residents as estimated by OFM to understand the general balance between jobs and population. In addition to examining this ratio for Bothell since 2000, the chart below also provides similar ratios over time for the



cities of Woodinville, Lynnwood, Shoreline, and Kenmore, as well as for King and Snohomish Counties as a whole. From these statistics, the city is well above the average for both counties and has a ratio that is generally comparable with the city of Lynnwood. (Note the decrease in Bothell's ratio in 2014 due to the major annexation by the city). While Woodinville is an outlier on the high end, other local cities such as Shoreline and Kenmore have significantly lower jobs-to-population ratios.

Exhibit B-23. Ratio of Covered Employment to Population: Bothell and Comparison Jurisdictions (2000-2022)



Sources: PSRC Covered Employment Estimates, 2023; BERK, 2023.

Geographically, employment in Bothell is concentrated in the Downtown, North Creek, and Canyon Park neighborhoods, as shown in [Exhibit B-24](#). Most workers in Bothell commute in from surrounding communities such as unincorporated areas (36%), Seattle (12%), and Everett (5%). More individuals commute into Bothell for work than leave to work in another location (28,778 compared with 19,813 individuals, respectively). The most common destinations for those who live in Bothell but work elsewhere are Seattle (29%), Bellevue (14%), Redmond (12%), and Kirkland (8%). See [Exhibit B-25](#) for the top inflow and outflow locations for workers and residents, and [Exhibit B-26](#) for summary statistics about these flows in and out of the city.

Home and Work Locations for Employed Workers

- Live in Bothell (work elsewhere)
- Work in Bothell (live elsewhere)
- Live and work in Bothell (work location)
- Census Blocks
- City Limits
- Bothell UGA
- Other Cities
- Other UGAs
- Unincorp. County

Imagine Bothell Comprehensive Plan
Public Review Draft April 2024


Exhibit B-25. Top Ten Job Inflow/Outflow Locations, Primary Jobs (2020)

Home Location (Work in Bothell)	Total People	Percent
Unincorporated Areas	10,407	36%
Seattle city	3,442	12%
Everett city	1,362	5%
Kirkland city	1,258	4%
Bellevue city	843	3%
Kenmore city	661	2%
Redmond city	641	2%
Shoreline city	617	2%
Marysville city	604	2%
Lynnwood city	568	2%
Work Location (Live in Bothell)	Total People	Percent
Seattle city	5,629	29%
Bellevue city	2,666	14%
Redmond city	2,332	12%
Kirkland city	1,603	8%
Unincorporated Areas	1,289	7%
Everett city	1,211	6%
Lynnwood city	543	3%
Woodinville city	481	2%
Renton city	249	1%
Shoreline city	240	1%

Sources: LEHD, Origin-Destination Employment Statistics, 2020; BERK, 2023.

Exhibit B-26. Origin/Destination for People Living/Working in Bothell, Primary Jobs (2020)

	Total People	Percent
Live in Bothell, Work Elsewhere	19,813	39%
Work in Bothell, Live Elsewhere	28,778	57%
Live and Work in Bothell	1,984	4%

Sources: LEHD, Origin-Destination Employment Statistics, 2020; BERK, 2023.



It appears that for people working in Bothell at primary jobs, a greater proportion of people come from Seattle or from unincorporated areas (including the MUGA) than from within the city itself. Seattle, Bellevue, and Redmond are more popular destinations for employment with respect to residents than Bothell. Given the size of Seattle and its role as a regional employment center, this is expected, but commuting flows to Bellevue and to a lesser extent Kirkland are important to note, especially given the planned Stride BRT line that will include three stations in the city and connect to these communities in the future.

In disaggregating the origin and destination data for employment from above, **Exhibit B-27** provides details about commuting patterns at different income levels, while **Exhibit B-28** gives information about how these patterns differ by categories of businesses. While there does not seem to be significant differences by income level, a slightly higher proportion of workers at goods-producing businesses in the city work in Bothell but live somewhere else when compared to workers in trade/transportation/utilities or other services (64% vs 53% and 56%, respectively). This suggests that the draw of commuters for these businesses may be slightly higher than for other businesses.

Exhibit B-27. Origin and Destination for People who Live and/or Work in Bothell, by Income Level, All Primary Jobs (2020)

	Low Income		Moderate Income		High Income	
	People	Percent	People	Percent	People	Percent
Live in Bothell, work elsewhere	2,370	43%	2,903	36%	14,332	39%
Work in Bothell, live elsewhere	2,865	52%	4,715	59%	20,986	57%
Live and work in Bothell	270	5%	392	5%	1,322	4%

Sources: Longitudinal Employer-Household Dynamics, Origin-Destination Employment Statistics, 2020; BERK, 2023.

Exhibit B-28. Origin and Destination for People who Live and/or Work in Bothell, by Sector, All Primary Jobs (2020)

	Goods Producing		Trade, Transp., Utilities		Other Services	
	People	Percent	People	Percent	People	Percent
Live in Bothell, work elsewhere	2,871	32%	3,730	44%	13,004	40%
Work in Bothell, live elsewhere	5,642	64%	4,479	53%	18,445	56%
Live and work in Bothell	345	4%	203	2%	1,436	4%

Sources: Longitudinal Employer-Household Dynamics, Origin-Destination Employment Statistics, 2020; BERK, 2023.

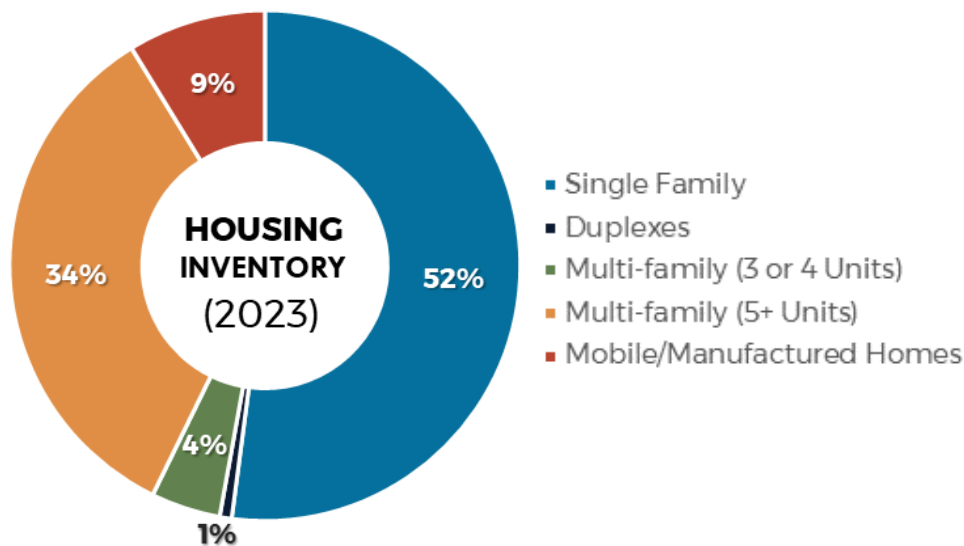


Housing Inventory

Housing Units by Type & Size

As of April 2022, OFM estimates there were 33,121 total housing units in Bothell and the MUGA. About 39% of the units were in King County, 23% were in the incorporated portion of Snohomish County, and 38% were in the unincorporated MUGA.⁴ **Exhibit B-29** breaks down housing units in the city as of 2023 (exclusive of the unincorporated MUGA) by units in structure. Within the city, just over half of all units were single family homes, and just over a third were apartments and other multifamily buildings with five or more units in the structure. A similar breakdown of housing stock by units in structure is not available for the unincorporated Bothell MUGA. However, it is expected that the vast majority of units there would be detached single family homes. Single-family development (including mobile homes) is the primary use on the sides and tops of the seven hills which comprise Bothell (West Hill, Beckstrom Hill, Norway Hill, East Norway Hill, Finn Hill, Bloomberg Hill, and Nike Hill).

Exhibit B-29. Housing Stock by Units in Structure in City of Bothell, 2023



Sources: OFM, 2023; BERK, 2023.

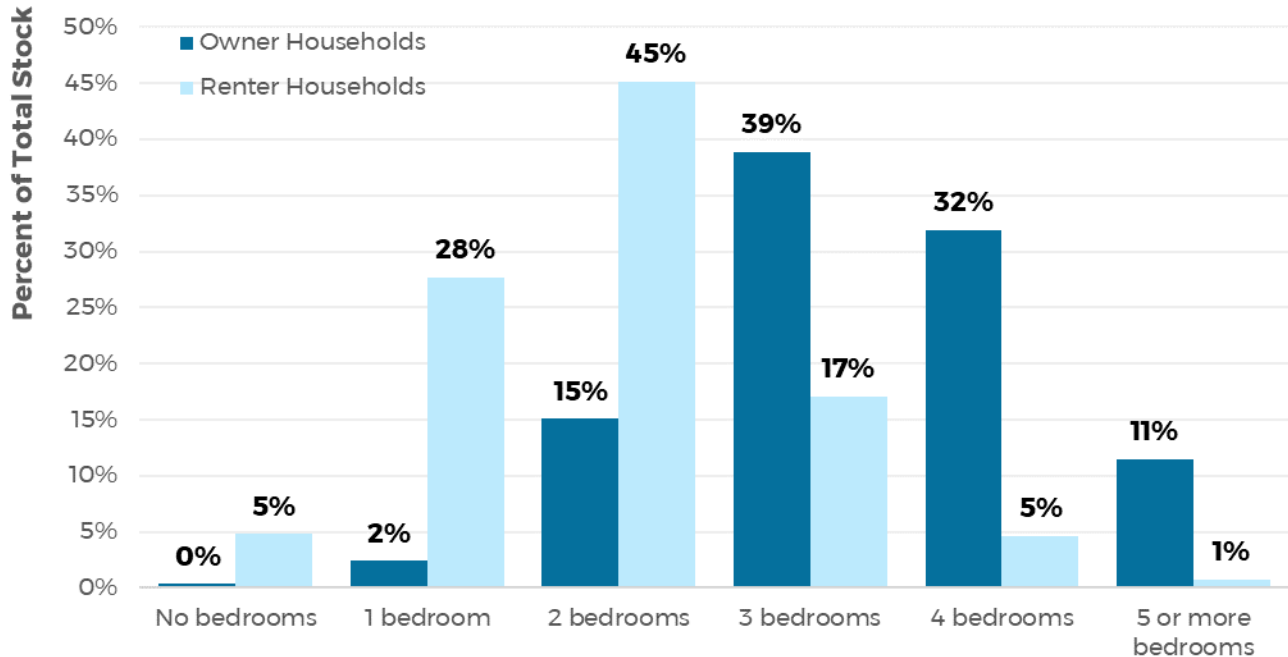
Bothell's housing stock has a range of bedrooms per unit (**Exhibit B-30**). Both owner and rental units range in number of bedrooms from 0 – 5 or more, with the majority of owner units having 3 or 4 bedrooms (71%) and rental units having 1 or 2 bedrooms (73%). About 5% of rental units have 4 or more bedrooms, suggesting the city's rental housing stock includes few detached homes. In total, about 39% of housing units in Bothell have 0 – 2 bedrooms compared to about 59% of households that have either 1 or 2 members, suggesting a misalignment between the size of housing units available and the size of

⁴ Source: WA State Office of Financial Management (OFM), Postcensal Estimates of Housing Units, April 1, 2020 to April 1, 2023; OFM Estimates of Total Housing Units for the Unincorporated Portion of Urban Growth Areas, 2022.



households ([Exhibit B-13](#)). Conversely, about 61% of housing units in Bothell have 3 or more bedrooms whereas about 31% of households have 3 or more members.

Exhibit B-30. Size of Bothell's Housing Supply by Number of Bedrooms and Tenure, 2021



Sources: ACS 5-Year Estimates (Table B25042), 2021; BERK, 2024.

Middle Housing

Within the City of Bothell, only about 5% of all units are in small multi-family structures of 2 to 4 units (see [Exhibit B-29](#)). These kinds of units are often called “middle housing,” as they can provide a housing option in between detached single-family homes and larger apartment buildings. Increasing the supply of middle housing is an important way to increase the diversity of housing options, particularly options that are affordable to moderate-income households. Accessory dwelling units (ADUs) are another middle housing format. ADUs are attached or detached units that serve as a secondary housing unit on a single family residential lot.

Manufactured & Mobile Homes

This category includes manufactured homes that are constructed in a factory and then assembled at the building site in modular sections, as well as recreational vehicles (RVs) and other vehicles such as vans that are used as housing. These homes are often much less expensive to produce than homes built on site and therefore have potential to be more affordable than traditional detached homes. Many manufactured homes in the city and MUGA are located on an individual parcel and function like a site-built home in that it can be either owned or rented by an individual household. However, as shown in [Exhibit B-31](#), Bothell

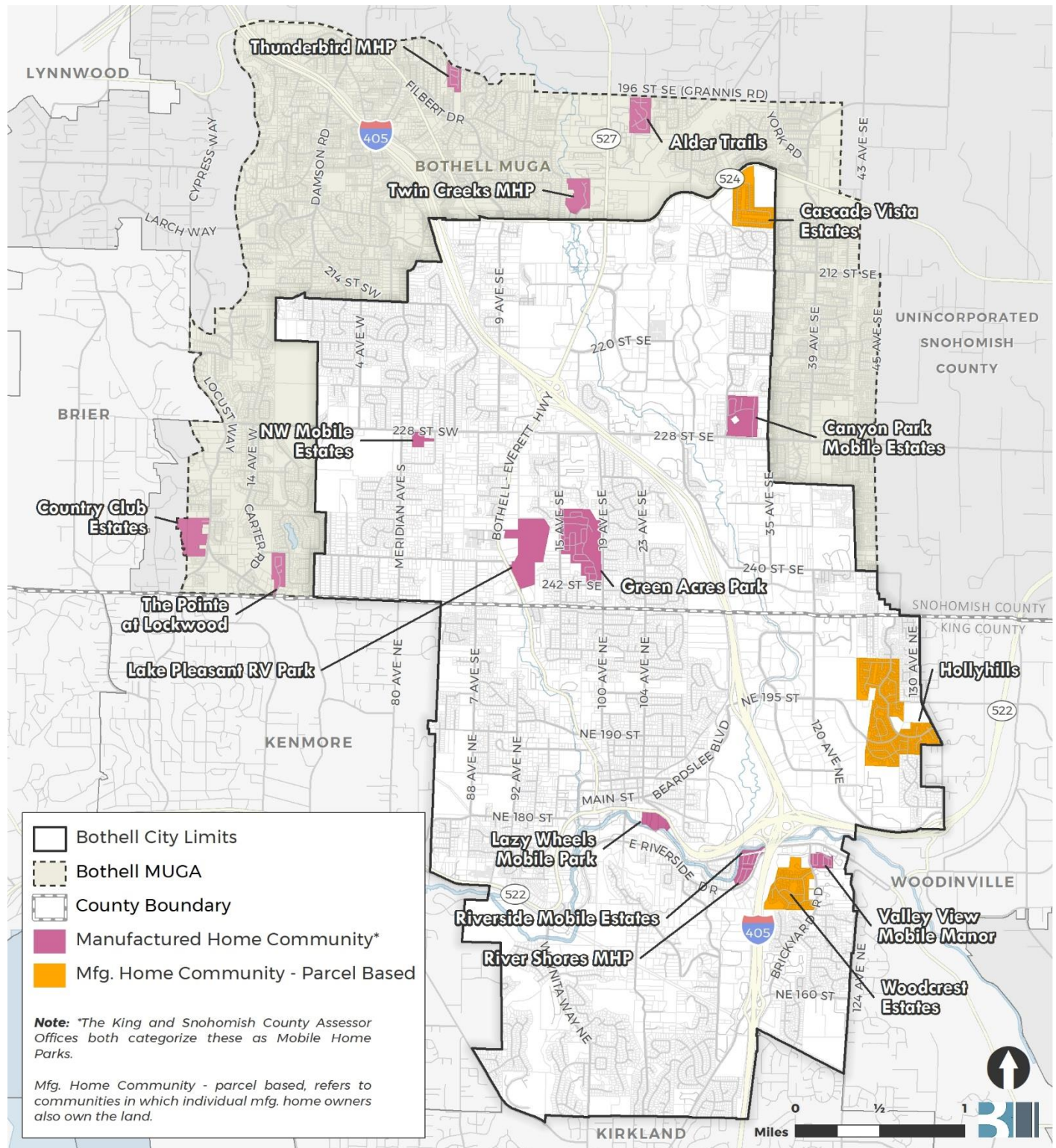


also has 12 manufactured housing communities (AKA mobile home parks)⁵ where the resident / homeowner owns the manufactured housing unit and rents the “lot” or “pad” that the home sits on from a landlord. Because the unit is sold separately from the land, homes in manufactured housing communities cost significantly less to buy than a traditional detached home on its own lot. As a result, the homes in manufactured housing communities provide relatively affordable homeownership opportunities. However, residents of manufactured home communities do not benefit from home value appreciation as the land value increases. They are also subject to the rules and regulations established in their lease agreement with the landlord/property owner and are vulnerable to displacement if the owner chooses to close the community or increase the rents and fees all residents must pay.

⁵ These places are also known as “mobile home parks.” However, many of the homes are no longer able to be moved, or they are exceedingly expensive to move. Therefore, the term “mobile home” is misleading.



Exhibit B-31. Manufactured Homes and Communities in the City of Bothell and MUGA, 2023



Sources: King County Assessor, 2023; Snohomish County Assessor, 2023; BERK, 2023.



OFM estimates that there are over 1,800 mobile or manufactured or mobile homes in the City of Bothell—nearly 10% of the total housing stock. However, data from the King County and Snohomish County Assessors indicate the count could be significantly higher. **Exhibit B-32** breaks down the number of manufactured/mobile home units inside and outside of manufactured housing communities. It shows at least 2,463 units, slightly over half of which are located in manufactured housing communities. However, the count of units in manufactured housing communities is likely to be higher, since the assessor only records data about units on which property taxes are paid, and owners of wheeled homes such as RVs or park models (wheeled homes without engines that can be towed) can also be parked long-term in manufactured housing communities and used as permanent housing. This means the total county of households that may be vulnerable to displacement in these communities could be much higher.

Exhibit B-32. Manufactured Housing in City of Bothell and the Bothell MUGA, 2023

	Units in Manufactured Housing Communities*	Units not in Manufactured Housing Communities	Total Units
King County	273	654	927
Snohomish County	1,101	435	1,536
TOTAL	1,374	1,089	2,463

* Note: Assessor records typically only count units on manufactured homes that do not have wheels, as owners of wheeled vehicles do not pay property taxes. RVs and park models (wheeled homes without engines that can be towed) can also be parked long-term in manufactured housing communities and used as permanent housing. Therefore, the true count of units in manufactured housing communities is likely to be higher.

Sources: King County Assessor, 2023; Snohomish County Assessor, 2023; BERK, 2023.

Bothell also has several neighborhoods where nearly all of the housing is manufactured homes, but the homes are located on their own separate parcels with individual ownership. Examples include Cascade Vista Mobile Estates and Holly Hills Mobile Home Park. Homeowners in these units do not have the same vulnerabilities as residents of manufactured housing communities. They also enjoy the financial benefits of land value appreciation.

Subsidized & Income-Restricted Housing

Income-restricted affordable housing is an important component of the regional housing supply, because market rate unit are not typically affordable to lower-income households. Units are reserved for low-income households and the rents are set at rates affordable to a target income level relative to AMI. Rental vouchers are another form of housing subsidy which assist low-income households to live in market-rate units. Vouchers are funded by HUD and administered by local housing authorities. Low-income households use these vouchers to rent market rate housing, but their monthly payments are capped at 30% of their income. HUD funds cover the remainder of the payments.

As of 2023, non-profit and private housing properties in Bothell offer an estimated 500 subsidized, affordable rental units. These include 106 1-bedroom units, 93 2-bedroom units, 20 3-bedroom units, and



281 units for which bedroom size is unknown.⁶ King County Housing Authority operates three facilities in or immediately adjacent to Downtown for seniors, families, and people with disabilities at Northlake House, Park Royal, and Heritage Park.⁷ Another project currently under construction in Downtown will provide 76 studio units affordable to seniors aged 55 and older with 50% AMI or less (Samma Senior Apartments).⁸ One property in the MUGA also offers subsidized units but the count of subsidized units is unknown.⁹

Emergency Housing, Emergency Shelters, & Permanent Supportive Housing

There are currently limited options in Bothell for emergency housing, emergency shelter, and permanent supportive housing. These housing types help people who are currently unhoused or facing eviction. Emergency housing and emergency shelter both provide temporary services; the difference being that emergency housing provides overnight accommodations while emergency shelter may not. Permanent supportive housing is long-term housing targeted to people who need comprehensive support services to retain tenancy. Per the King and Snohomish County countywide planning policies (CPPs), there were 18 emergency beds and no permanent supportive housing beds citywide as of 2020.¹⁰ Per the King County Regional Homelessness Authority (KCRHA)'s Regional Housing Services Database, two facilities in the King County portion of Bothell offer transitional and permanent supportive housing for people experiencing homelessness—37 beds for young adults (with a stay limit of 18 months) are provided by Friends of Youth at New Ground Bothell and 45 beds of permanent supportive housing for families with children under 18 and AMI of 30% or less are provided by Hopelink at Heritage Park.¹¹ These counts are higher than what the 2020 CPPs indicate but the existing supply is still far lower than the projected 2044 need based on allocated growth targets (see **Bothell's GMA Growth Targets** below).¹² There are no emergency shelters in the Snohomish County portion of Bothell per the Housing Authority of Snohomish County.¹³

Emergency/transitional or permanent supportive housing is not included as a use type in Bothell's land use code but is not explicitly prohibited in any of the zones which allow residential dwelling units or hotels. Households of more than six unrelated persons are generally not permitted in Bothell, although, the Community Development Director may allow larger numbers of unrelated people to live together through a grant of special accommodation for residents of domestic violence shelters (allowing groups of

⁶ ARCH also supplied an inventory of known affordable housing development in Bothell and income limits (if available) as of February 2024. Per communications, the provided inventory could be missing some properties (particularly in Snohomish County) and could include some overlapping properties. However, the inventory supplied by ARCH indicates an undersupply of existing subsidized and income restricted units consistent with findings from the UW Housing Market Data Toolkit. UW Housing Market Data Toolkit, [Subsidized Rental Housing Profile](#), 2023; Personal communication with Mike Stanger, ARCH, 2024.

⁷ King County Housing Authority, [Housing Options in Bothell](#), accessed January 2024.

⁸ [Samma Senior Apartments - Imagine Housing](#), 2024.

⁹ Per the [Washington State Housing Finance Commission](#) (data last updated January 1, 2024), Willow Tree Grove in the MUGA offers subsidized rental units through the Low Income Housing Tax Credit (LIHTC). The Housing Authority of Snohomish County also owns two facilities in the MUGA near Thrasher's Corner ([Autumn Chase](#) and [Madison Park](#)) but rents are fair market.

¹⁰ King County Countywide Planning Policies, 2021 (amended 2023 per Growth Management Planning Council Motion 23-1); Housing Characteristics and Needs in Snohomish County, May 2023.

¹¹ KCRHA, [Regional Housing Services Database](#), accessed January 2024; Friends of Youth, [Services](#), 2024; Hopelink, [Eligibility Requirements](#), 2024.

¹² The inventory supplied by ARCH of known affordable housing development in Bothell and income limits (if available) indicates an undersupply of existing emergency and permanent supportive housing consistent with the KCRHA and CPP findings. Personal communication with Mike Stanger, ARCH, 2024.

¹³ Housing Authority of Snohomish County [Community Supports & Homeless Resources](#), accessed January 2024.



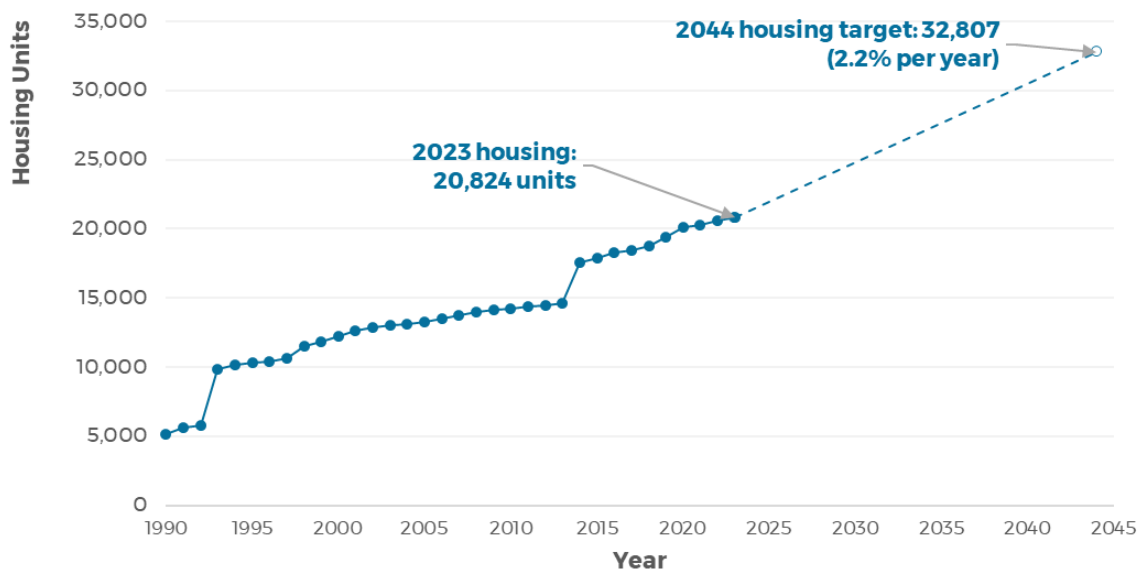
7-15 people in single-family dwelling units) or through a grant of reasonable accommodation to comply with the provisions of the Federal Housing Act amendments ([BMC 12.06.140](#)). Adult family homes are allowed in all zones and residential care facilities for 5-15 functionally disabled persons are allowed in all residential zones ([BMC 12.06.140](#)). Transitory accommodations—meaning non-permanent tents, sheds, huts, cabins, trailers, or other enclosures—are also permitted as a temporary use in all zones ([BMC 12.06.160](#)).

In early 2023, Bothell also signed onto a formal agreement with KCRHA (along with Kenmore, Lake Forest Park, Shoreline, and Woodinville) to pool funding and administration through the agency. As part of this agreement, the cities agreed to contribute \$1.20 per capita as a minimum contribution—Bothell provided \$52,000 in funding in 2023.¹⁴

Housing Production Trends

Exhibit B-33 shows historical housing unit growth in Bothell from 1990 to 2023 and the 2044 target households set by King and Snohomish counties. Per OFM, there were 20,824 housing units in Bothell as of April 2023 (up from 20,585 in 2022, 20,297 in 2021, and 20,138 in 2020). From 2023 to 2044, the city will need to increase its housing stock by nearly 12,000 net new units, or a 2.2% rate of growth per year, to meet the 2044 targets (see **Exhibit B-51** and **Bothell's GMA Growth Targets** under **Section B.3 Gap Analysis**). This would require a slightly faster rate of growth than seen in the city in recent years. Since 2014, however, Bothell has grown at a faster rate than other nearby cities (see **Exhibit B-34**).

Exhibit B-33. Historic Housing Growth and 2044 Housing Target

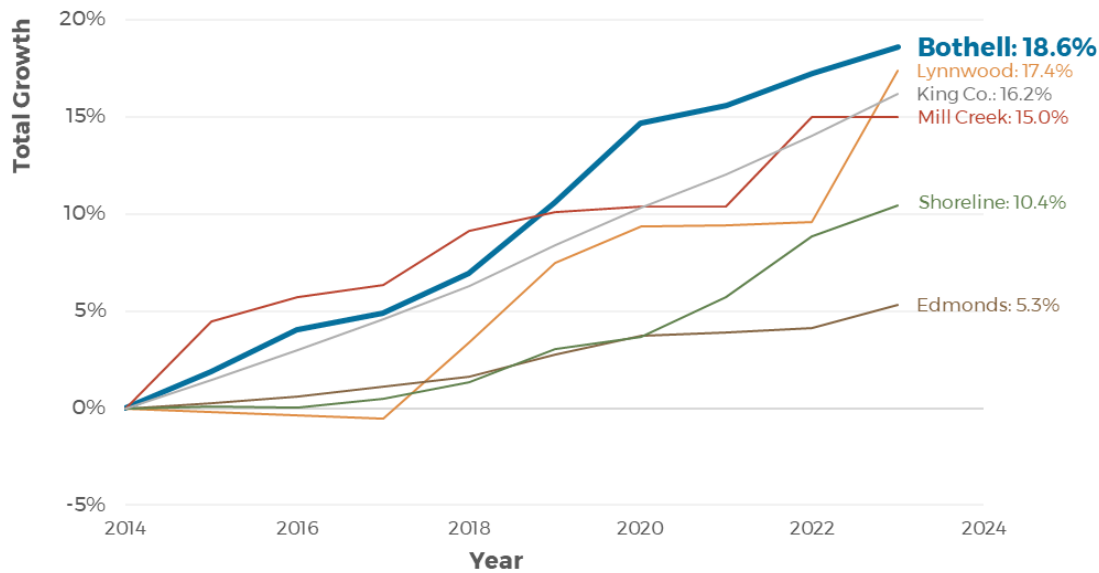


Source: OFM, 2023; BERK, 2023.

¹⁴ KCRHA [Five Year Plan \(2023 – 2028\)](#), 2023.

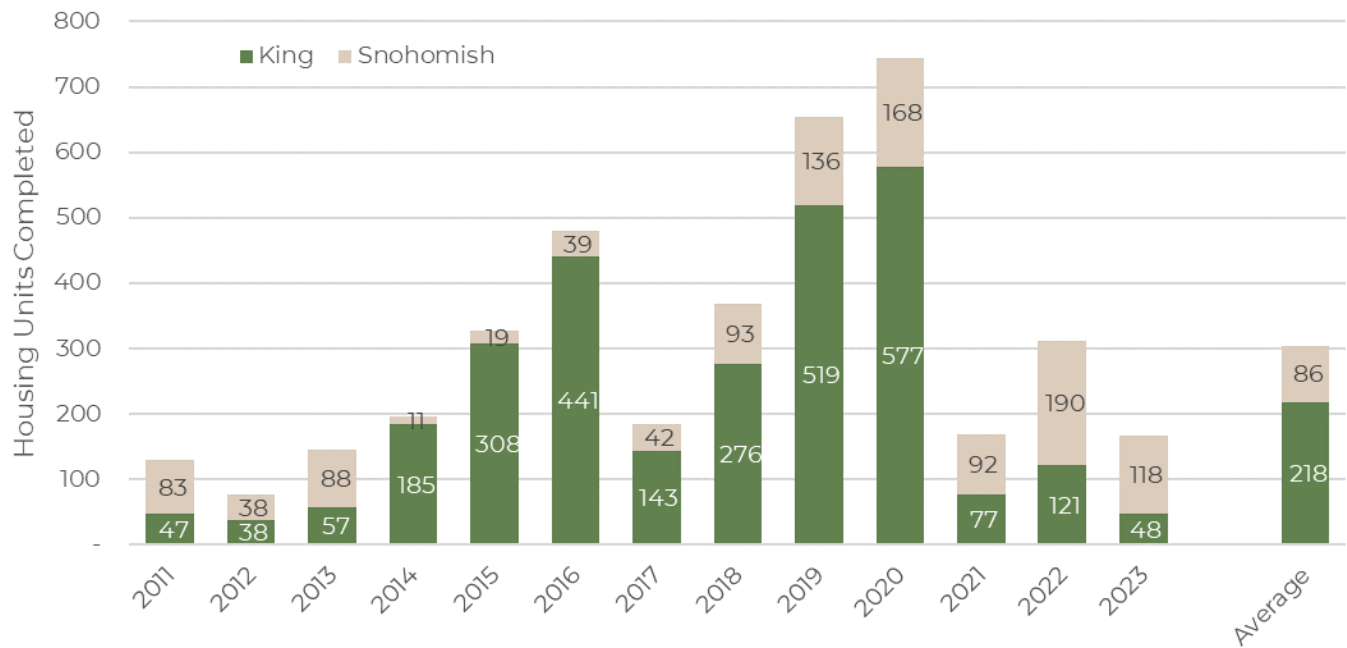


Exhibit B-34. Regional Housing Growth Comparison, 2014-2023



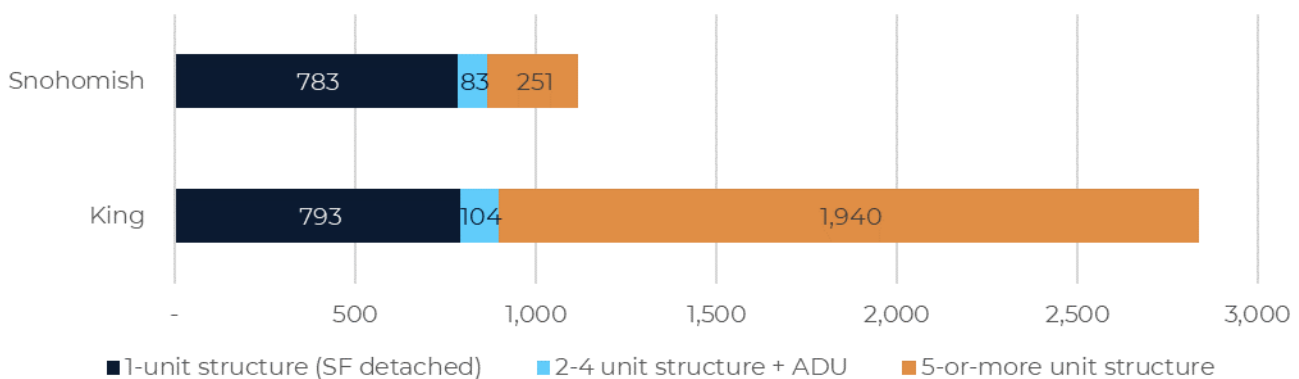
Source: OFM, 2023; BERK, 2023.

Exhibit B-35 shows average annual housing production (completed units) in the City of Bothell. Overall, the King County side of Bothell has seen greater production of new housing. However, production has varied considerably year by year. Most notably, production in King declined substantially in 2021, likely in part due to COVID-19 impacts on construction. More recent permit data indicates that the King County side of Bothell may be recovering from this latest downturn, with 1,330 total units permitted in 2022 and 2023. However, there can be a lag of several years between the issuing of a permit and project completion—particularly for larger multifamily housing developments.

**Exhibit B-35. Annual Housing Unit Production in City of Bothell, 2011-2023**

Sources: City of Bothell, 2023; BERK, 2023.

Exhibit B-36 shows the total units completed by units in structure. In Snohomish, about 70% of new housing units produced were detached single family homes. The opposite was true in King County, where 68% of new units were in multifamily structures with five or more units. In both counties, middle housing with 2 to 4 units in structure and Accessory Dwelling Units (ADUs) comprised a relatively small share of overall housing production.

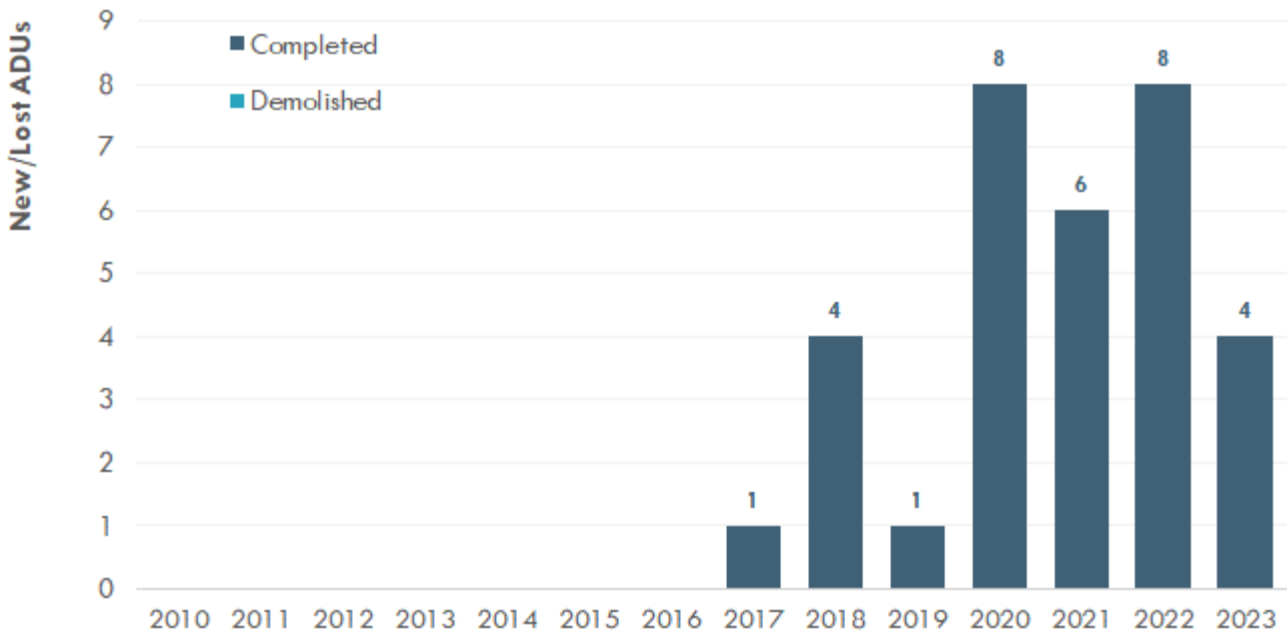
Exhibit B-36. Total Unit Production in City of Bothell by Units in Structure, 2011-2023

Sources: City of Bothell, 2023; BERK, 2023.

In recent years, a limited number of Accessory Dwelling Units (ADUs) have been built in the City of Bothell. Since 2017, Bothell has added a total of 32 ADU's, with growth at its highest in 2020 and 2022. See **Exhibit B-37**. ADUs can serve as a form of Middle Housing to help meet the new requirements set forth in HB 1110.



Exhibit B-37. ADU Production in the City of Bothell, 2010-2023



Source: OFM, 2023; BERK, 2023.



Housing Affordability

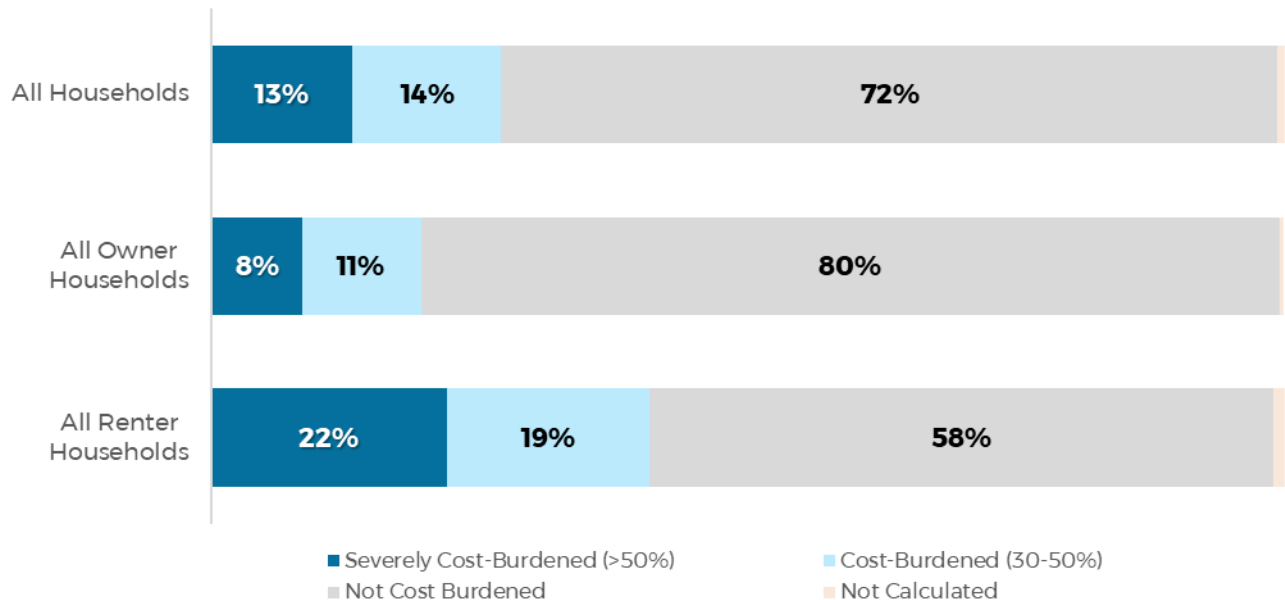
Housing Cost Burden

A household is considered cost burdened when they spend more than 30% of their household income on housing, and severely cost burdened when that share increases to greater than 50%. In 2020, about 27% of all households living in the City of Bothell¹⁵ were cost-burdened, nearly 5,000 in total.¹⁶ Over 2,000 of these households were severely cost-burdened.

Exhibit B-38 shows the percentage of renter and owner households by cost-burden status. Renter households were significantly more likely to be cost-burdened during this period—over 41% compared to only 19% of owner households.

Exhibit B-39 looks at the proportion of all households, by race, that are cost-burdened. Households of Color overall have similar rates of cost-burden to White households. However, Hispanic/Latino households are more likely to be cost-burdened, with a notably higher percentage of Hispanic/Latino households spending 30-50% of their income on housing than other racial groups.¹⁷

Exhibit B-38. Proportion of All Households by Cost Burden and Tenure (2020)



Note: HUD does not calculate cost burden status for households with zero or negative income. These are represented as “Not Calculated” in the chart.

Sources: HUD CHAS data (based on 2016-2020 ACS 5-year estimates); BERK, 2023.

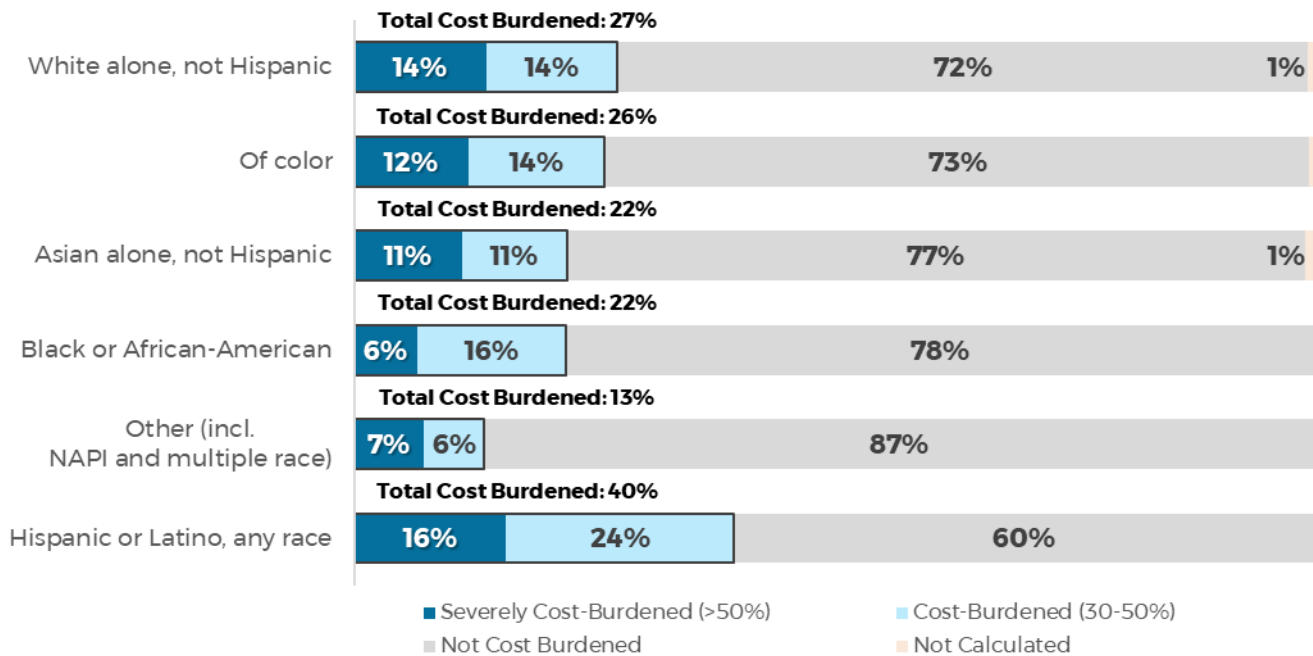
¹⁵ Available data on cost burden is only available for the City of Bothell, and not the unincorporated MUGA. Therefore, all cost-burden statistics only reflect residents in the city (King and Snohomish county portions combined).

¹⁶ U.S. Department of Housing and Urban Development (HUD) Comprehensive Housing Affordability Strategy (CHAS) data (based on 2016-2020 American Community Survey (ACS) 5-year estimates)

¹⁷ Hispanic/Latino households represent about 9% of total households as of 2020 (see [Exhibit B-12](#)).



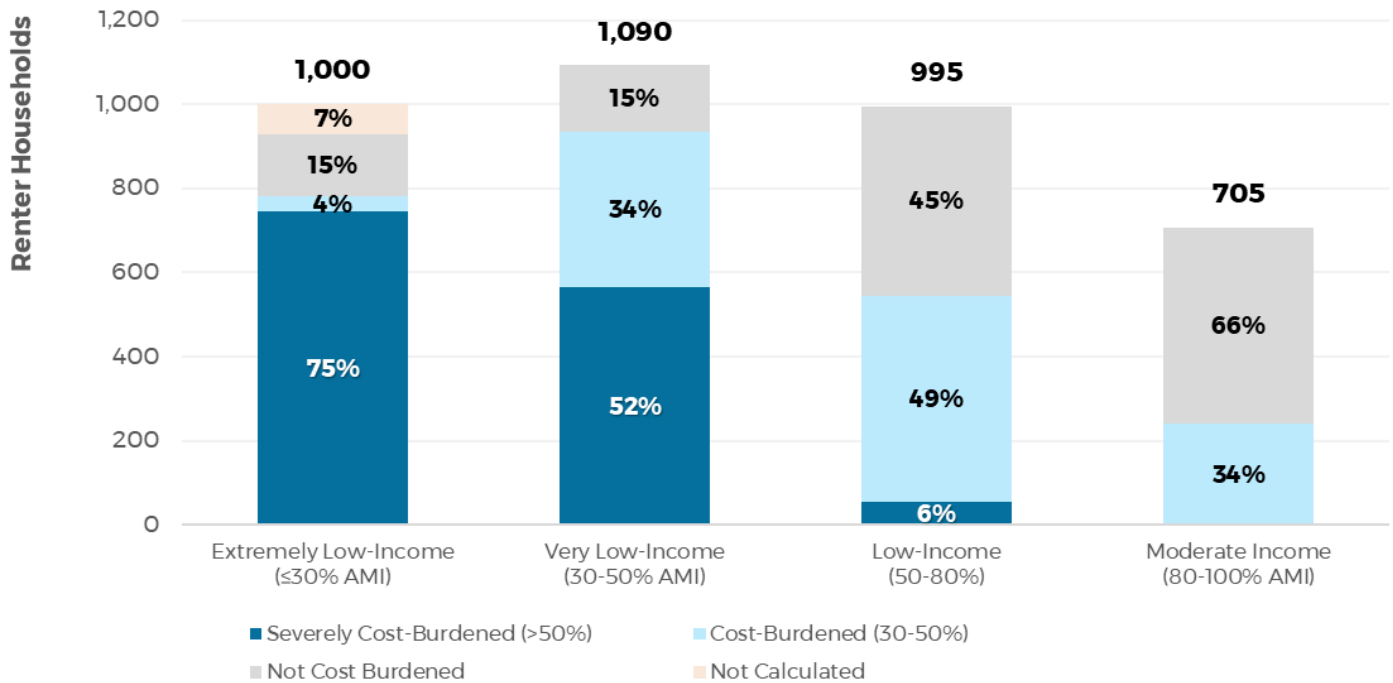
Exhibit B-39. Cost Burden Status of All Households by Racial and Ethnic Group (2020)



Sources: HUD CHAS data (based on 2016-2020 ACS 5-year estimates); BERK, 2023.

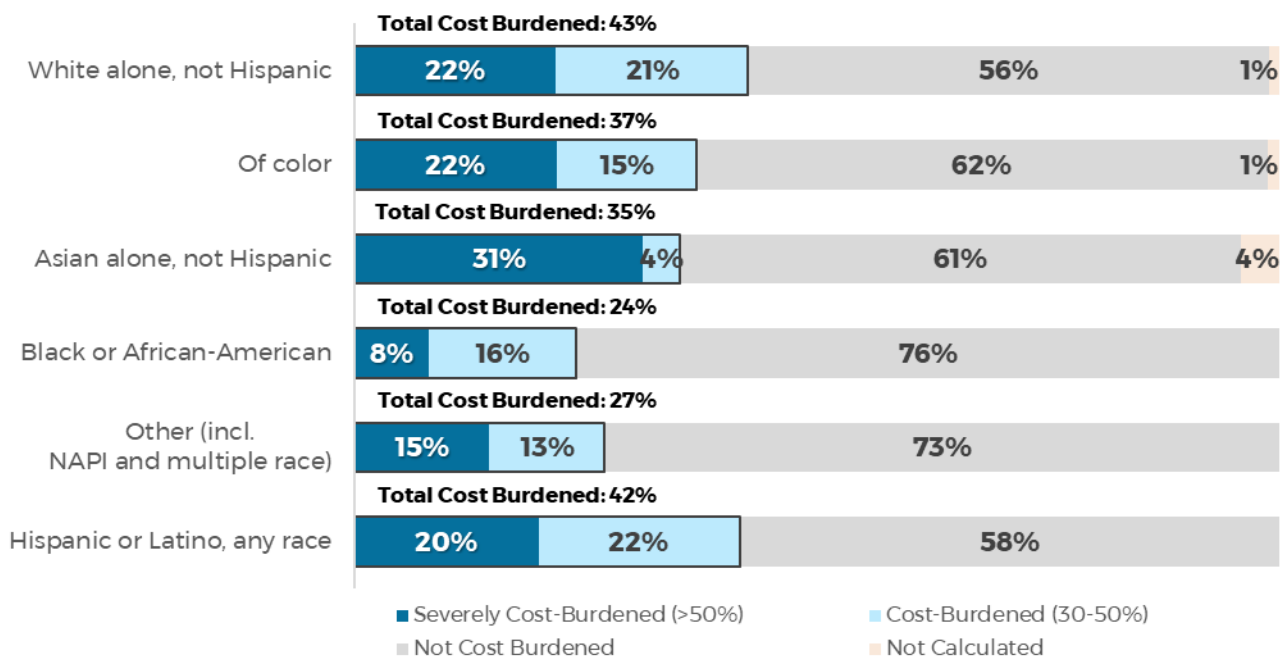
Exhibit B-40 breaks down renter household cost burden status by income level for households with incomes at or below AMI. Households with incomes at or below 50% AMI were most likely to experience cost burden. About four out of five of these households were cost burdened. Cost-burden was also common among Low- and Moderate-Income renter households. Over half (55%) of renter households with incomes between 50 and 80% of AMI experienced cost burden, as did over a third (34%) of renter households with incomes between 80 and 100% AMI. Overall, 22% of renter households are severely cost-burdened and 19% are cost-burdened (

Exhibit B-38). White households are slightly more likely to be cost-burdened than households of Color (43% versus 37%, respectively; see **Exhibit B-41**). Of households that rent, Asian households are the most likely to be severely cost-burdened, followed by White and Hispanic or Latino households. This indicates more vulnerability to displacement risk.

**Exhibit B-40. Cost Burden Status of Renter Households by Income Level, 2020**

Note: HUD does not calculate cost burden status for households with zero or negative income. These are represented as “Not Calculated” in the chart.

Sources: HUD CHAS data (based on 2016-2020 ACS 5-year estimates); BERK, 2023.

Exhibit B-41. Cost-Burden Status of Renter Households by Race and Ethnic Group, 2020

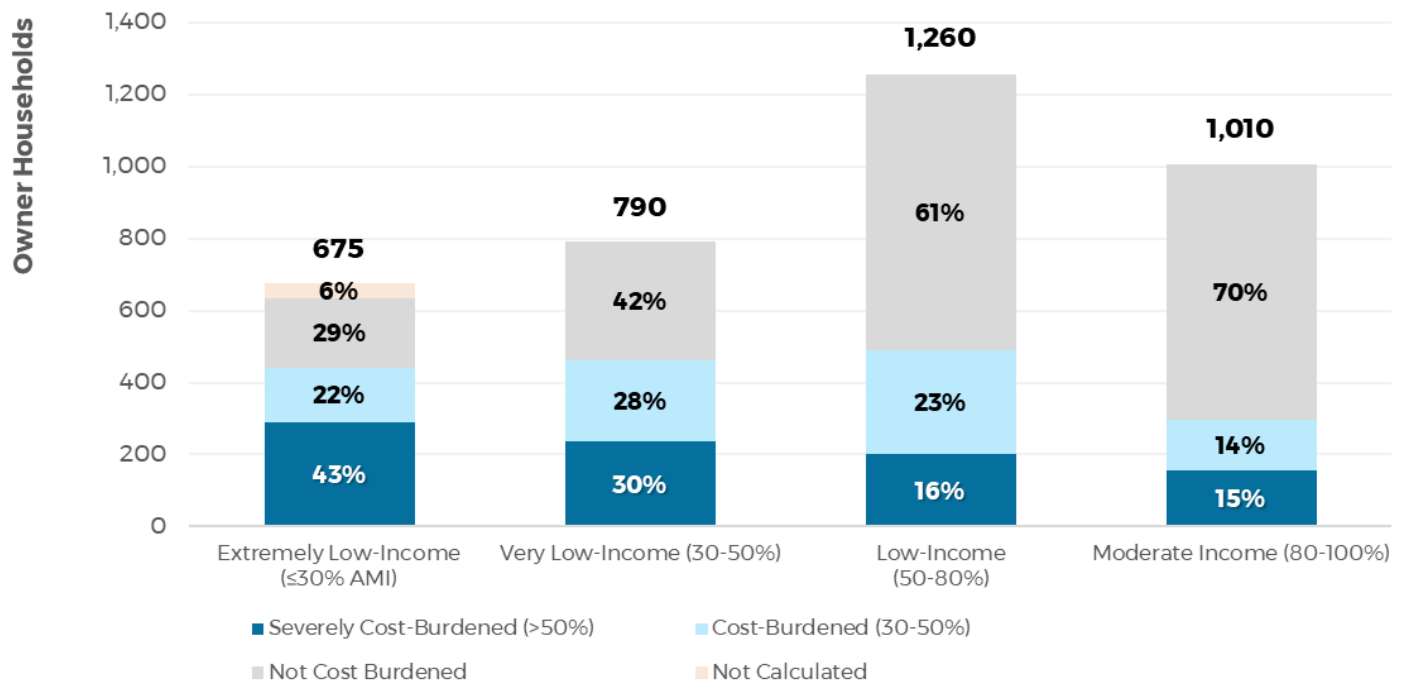
Sources: HUD CHAS data (based on 2016-2020 ACS 5-year estimates); BERK, 2023.



Cost burden status by income level for owner households with incomes at or below AMI is more consistent across income level than for renter households, as shown in [Exhibit B-42](#). A much greater proportion of owner households also have incomes above AMI (68% versus 39%) and so the total percentage of owner households experiencing cost burden (20%) is relatively lower than it is for renter households (41%).

[Exhibit B-43](#) breaks down cost burden status by race for owner households. White households and households of Color have similar rates of cost burden, although a higher percentage of White households are severely cost burdened. Hispanic/Latino households have the highest rate of cost burdened amongst owner households in Bothell (35%).

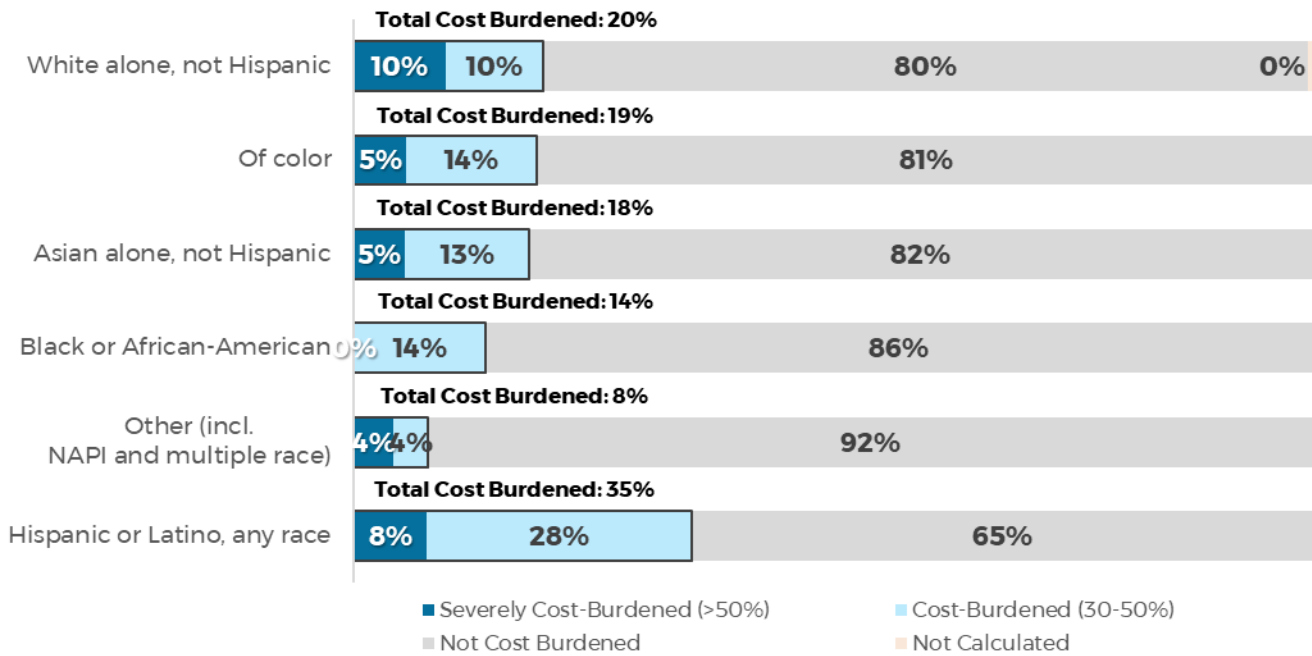
Exhibit B-42. Cost Burden Status of Owner Households by Income Level, 2020



Sources: HUD CHAS data (based on 2016-2020 ACS 5-year estimates); BERK, 2023.



Exhibit B-43. Cost Burden Status of Owner Households by Race and Ethnicity, 2020

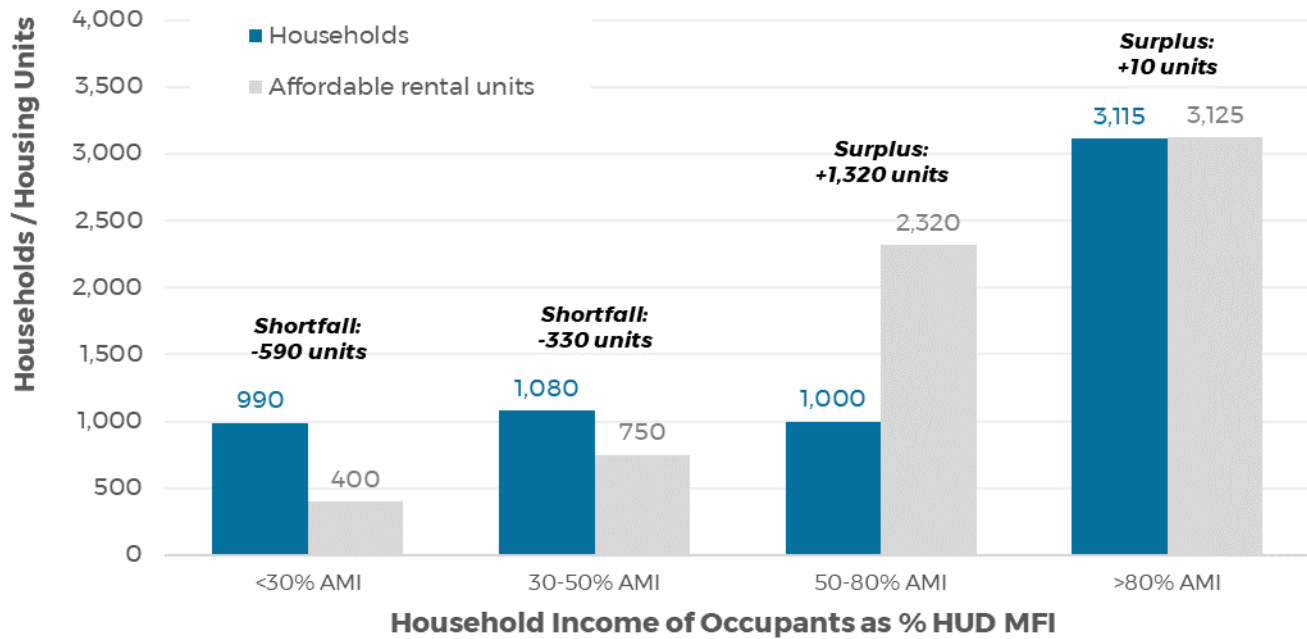


Sources: HUD CHAS data (based on 2016-2020 ACS 5-year estimates); BERK, 2023.

The jobs to housing ratio is another measure used to understand whether there is an adequate supply of housing to support local employment in a community. The ratio is determined by dividing the total number of jobs by the number of housing units. A ratio of 0.75 – 1.5 is considered a balanced ratio and can indicate that a community has sufficient housing for its employees and that area commutes are of reasonable length. A ratio higher than 1.5 can indicate affordability challenges and/or a lack of housing supply. Communities with ratios below 0.75 may have shortages of employment opportunities and are often classified as “bedroom communities.” Workers in these cities likely need to commute to work in surrounding areas. As of 2022, the jobs to housing ratio in Bothell was 1.57 (32,421 jobs divided by 20,585 units in city limits), slightly higher than the balanced range and higher than the ratio in 2021 of 1.53 (30,977 jobs divided by 20,297 units), suggesting that housing supply and affordability are growing concerns.

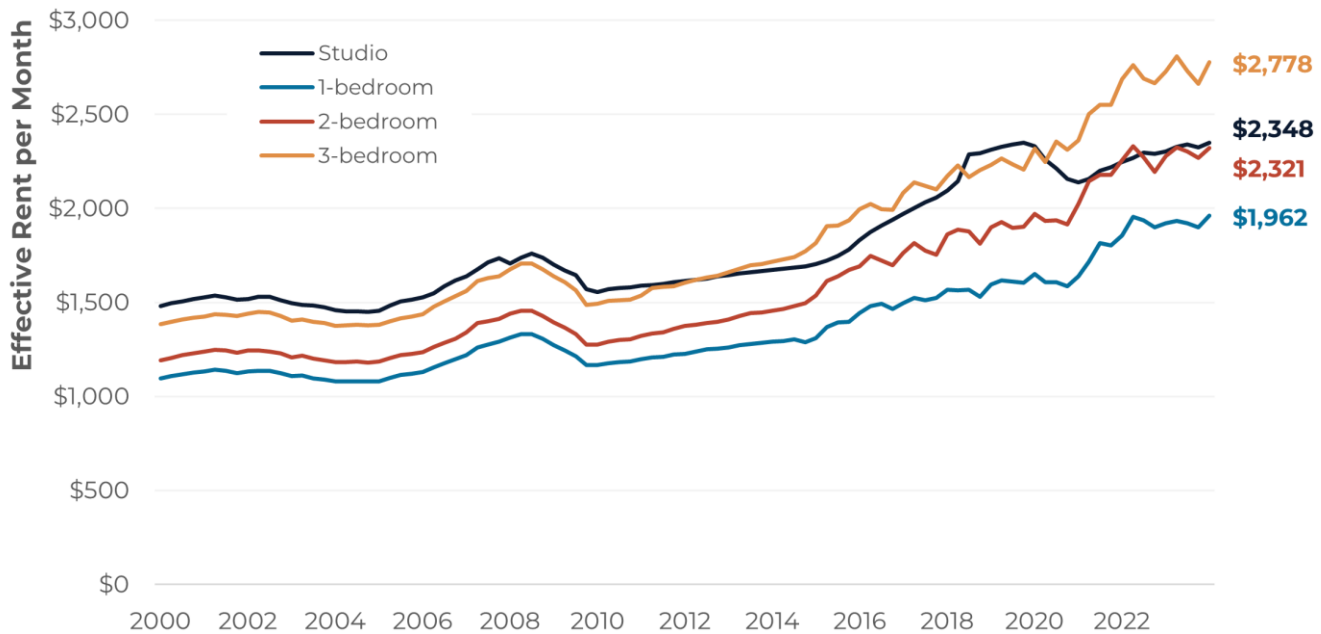
Rental Housing Affordability

Exhibit B-44 compares the estimated number of renter households by income level to the estimated number of rental housing units affordable at each income level. This data reflects conditions between 2016 and 2020, and housing costs have increased significantly during the past several years. Nonetheless, for this period HUD estimates there was a significant shortage of units affordable at or below 30% AMI and a surplus of units affordable at the 50-80% AMI level. However, over half of the renter households in Bothell with incomes 50-80% AMI experienced housing cost-burden during the same period despite the nominal surplus in units at this affordability level. This indicates many of those units were occupied by households with lower or higher incomes and unavailable.

**Exhibit B-44. Renter Household Income Versus Rental Unit Affordability, 2020**

Sources: HUD CHAS data (based on 2016-2020 ACS 5-year estimates); BERK, 2023.

In more recent years, rents have increased significantly in Bothell. [Exhibit B-45](#) shows average rents over time. From 2015 to 2024 average rents increased between 38% for studios up to 53% for 3-bedroom units. In 2023, an average studio was affordable to a household with income of 99% AMI, after adjusting for household size. For other unit sizes the affordability was around 80% AMI.

**Exhibit B-45. Average Multifamily Rents by Unit Size, 2000-2024**

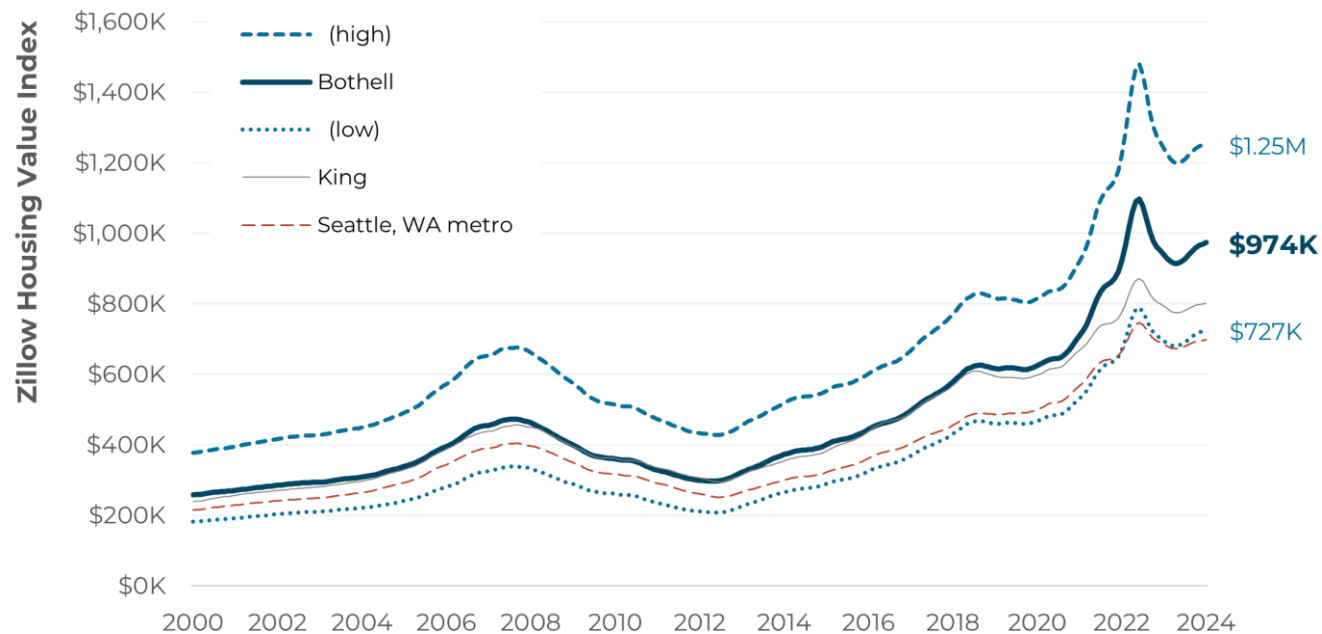
Sources: CoStar, 2024; BERK, 2024.

Ownership Housing Affordability

Exhibit B-46 shows median home values in Bothell, King County, and the entire Seattle Metropolitan region. As of January 2024, the median price for home sales in Bothell was around \$973,517. This is a dip from a peak of \$1,096,840 in June 2022, likely due to the impact of rising interest rates on home sales. Prior to mid-2022 housing prices had been increasing rapidly, and faster than the region as a whole. In 2017, the median sales price was \$596,000. During the following 5 years, costs increased by 83% to a peak in spring 2022. The exhibit also shows the typical value for homes in the upper third (high) and lower third (low) of the Bothell housing market.

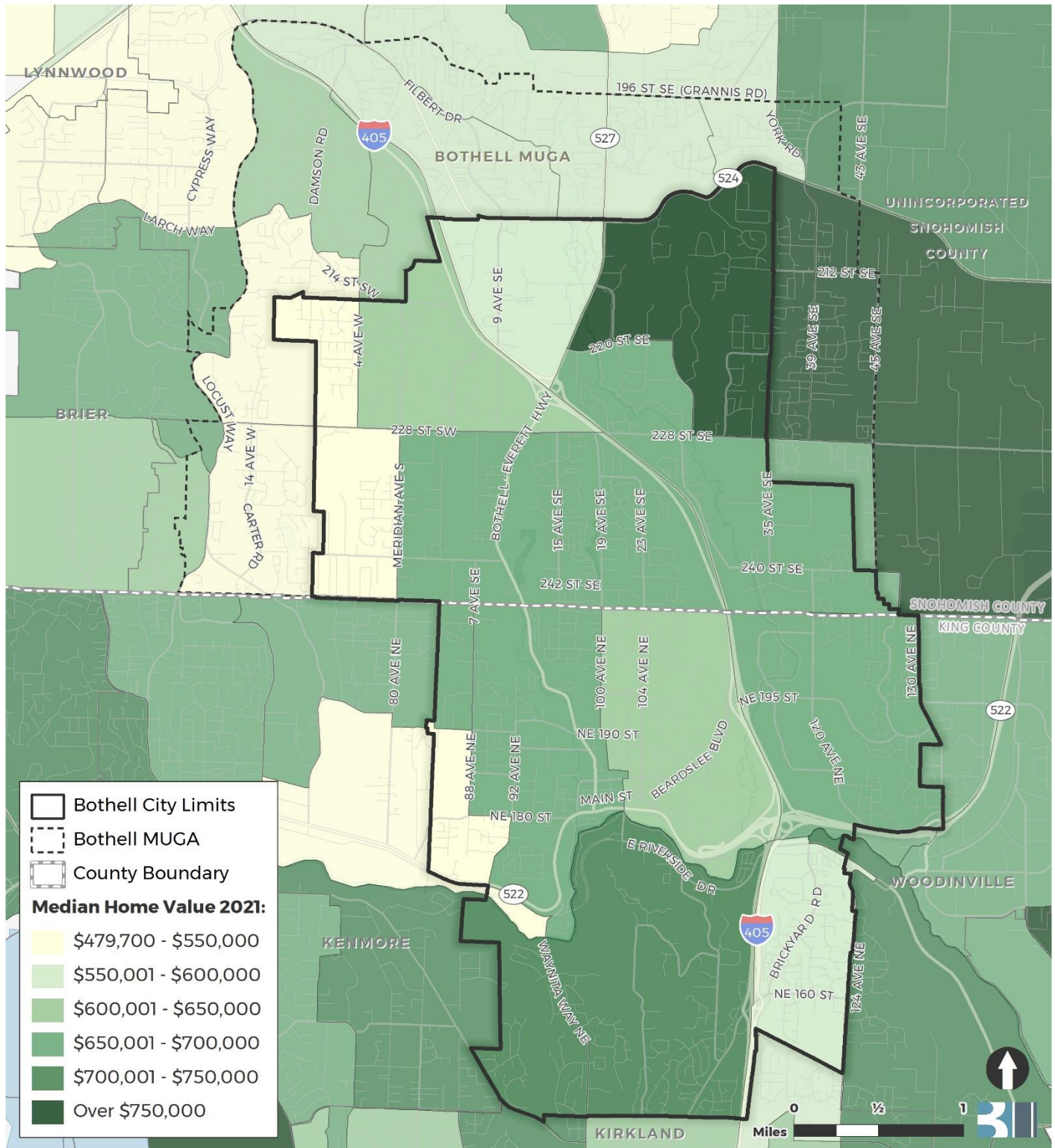


Exhibit B-46. Median Home Value, 2000–2024



Sources: Zillow, 2024; BERK, 2024.

Exhibit B-47 maps median home value by Census Tract as of approximately 2021. Home values are the highest in the east side of the Canyon Park Subarea and east into the MUGA. Home values are the lowest on the west side of the Queensborough/Brentwood/Crystal Springs and Shelton View/Meridian/ 3rd SE neighborhoods.

**Exhibit B-47. Median Home Value in Bothell by Census Tract, 2021**

Sources: ACS 5-Year Estimates, 2021; BERK, 2023.



B.2 DISPLACEMENT RISK & RDI

Consistent with the GMA amendments in HB 1220, each city and county has a duty to begin to undo policies and practices that lead to racially disparate impacts (RDI), displacement, and exclusion in housing. This section summarizes displacement risk in Bothell, racially disparate housing impacts, and the June 2023 review of whether current City policies and regulations support diversity, equity, inclusion, and anti-displacement (see the [Diversity, Equity, Inclusion, and Anti-Displacement Analysis](#) and [Bothell Middle Housing Market Analysis and Feasibility Assessment](#)).

Displacement Risk

Policy guidance from Washington State department of Commerce (Commerce) and King and Snohomish Counties calls for comprehensive plans to study displacement and establish anti-displacement policies. Displacement refers to instances when a household is forced or pressured to move from their home against their will. While it is not possible to quantify the number of households displaced in a given year, displacement risk helps us identify those communities under pressure. Displacement can be physical, economic, or cultural. Direct, **physical displacement** occurs in cases of eviction, the termination of a tenant's lease, or public land claims through eminent domain. Physical displacement can also occur when a property owner decides to renovate units to appeal to higher-income tenants or when buildings are sold for redevelopment. Another cause might be the expiration of an affordability covenant and resulting conversion of the unit to market rate housing. **Economic displacement** occurs when a household relocates due to the financial pressure of rising housing costs. Renters are more vulnerable to economic displacement, particularly those who are low-income, although some homeowners can experience this as well with significant increases to property tax bills. **Cultural displacement** is the result of fractured social fabrics. When physical and/or economic displacement affects community businesses, social institutions, and a concentration of racial or ethnic households, other households who affiliate with the affected cultural group may begin to feel increased pressure or desire to relocate.

Displacement Risk Mapping

The June 2023 [Diversity, Equity, Inclusion, and Anti-Displacement Analysis](#) and [Bothell Middle Housing Market Analysis and Feasibility Assessment](#) mapped displacement risk in Bothell at the Census tract level. Displacement risk was assessed by combining results of the socioeconomic vulnerability index and 2023 development feasibility assessment. The socioeconomic vulnerability index identified groups that are inequitably burdened by housing costs and then created a weighted index based on 2021 Public-Use Microdata Survey (PUMS) data. The indexes were combined through a rank order process to create a composite index for each Census tract that intersects with the city limits. The following groups were identified to have a higher likelihood of cost-burden than the Puget Sound region overall:

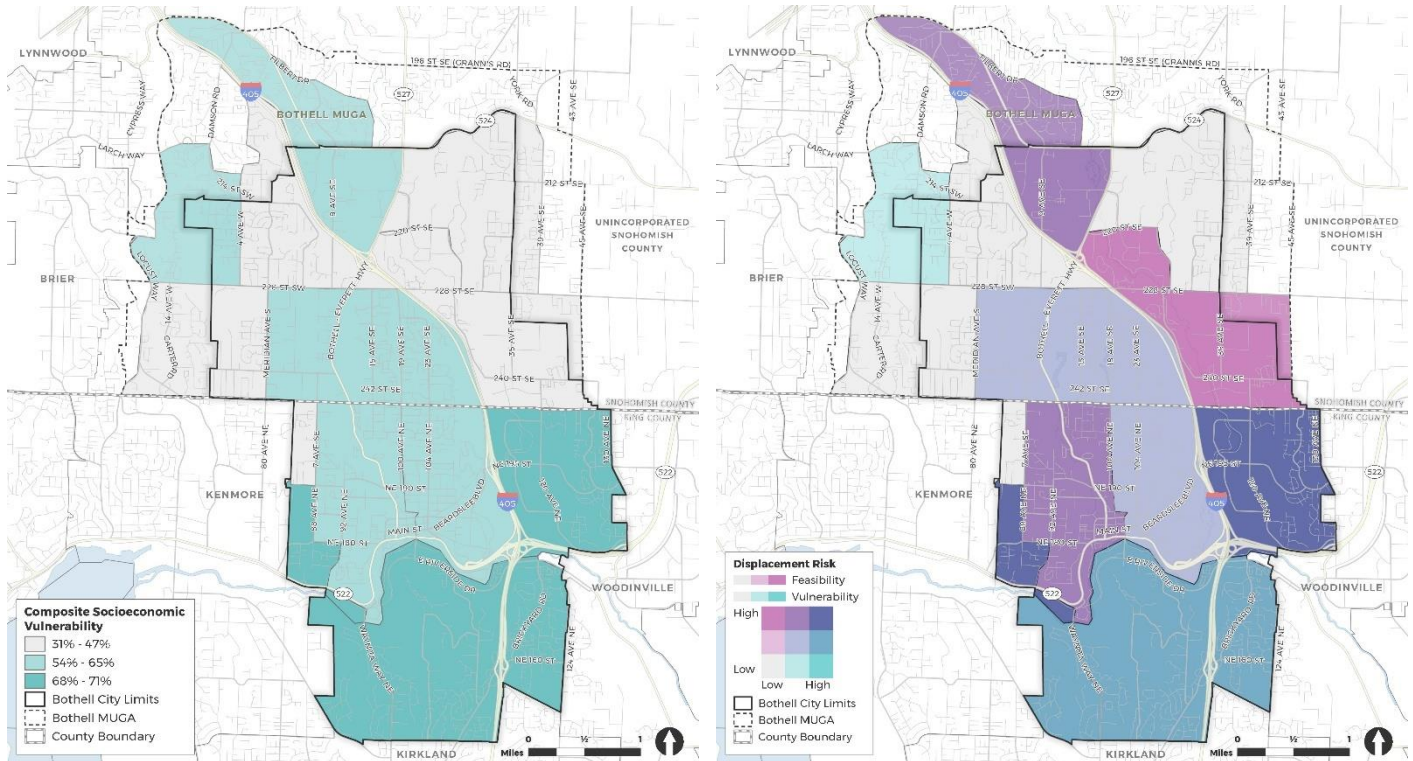
- Black & Indigenous People of Color (BIPOC) (neither White non-Hispanic, Asian non-Hispanic, nor Hispanic/Latino people are included in this group)
- People of Hispanic/Latino origin, any race
- People five years and older who speak English “not well” (“Low-English Proficiency” or “LEP”)
- People with one or more disabilities



- People 25 years and older who have an educational attainment of less than a Bachelor's degree
- Foreign-born population

In general, the analysis revealed that socioeconomic vulnerability is greater in the King County portion of the city—neighborhoods east, west, and south of Downtown show the greatest concentration of socioeconomic vulnerability, though it's possible there is a variation in socioeconomic vulnerability within each Census tract. Census tracts with a higher concentration of vulnerable populations are more likely to face possible displacement, especially in areas where development is more likely. Areas of high development propensity and with a high socioeconomic vulnerability index include residential neighborhoods east of I-405 (Bloomberg Hill and North Creek/195th neighborhoods) and the south end of the Westhill neighborhood. See **Exhibit B-48** for maps of the socioeconomic vulnerability index and displacement risk citywide and **Exhibit B-49** for maps of the individual facets of the socioeconomic vulnerability index.

Exhibit B-48. City of Bothell Socioeconomic Vulnerability Index and Displacement Risk Map

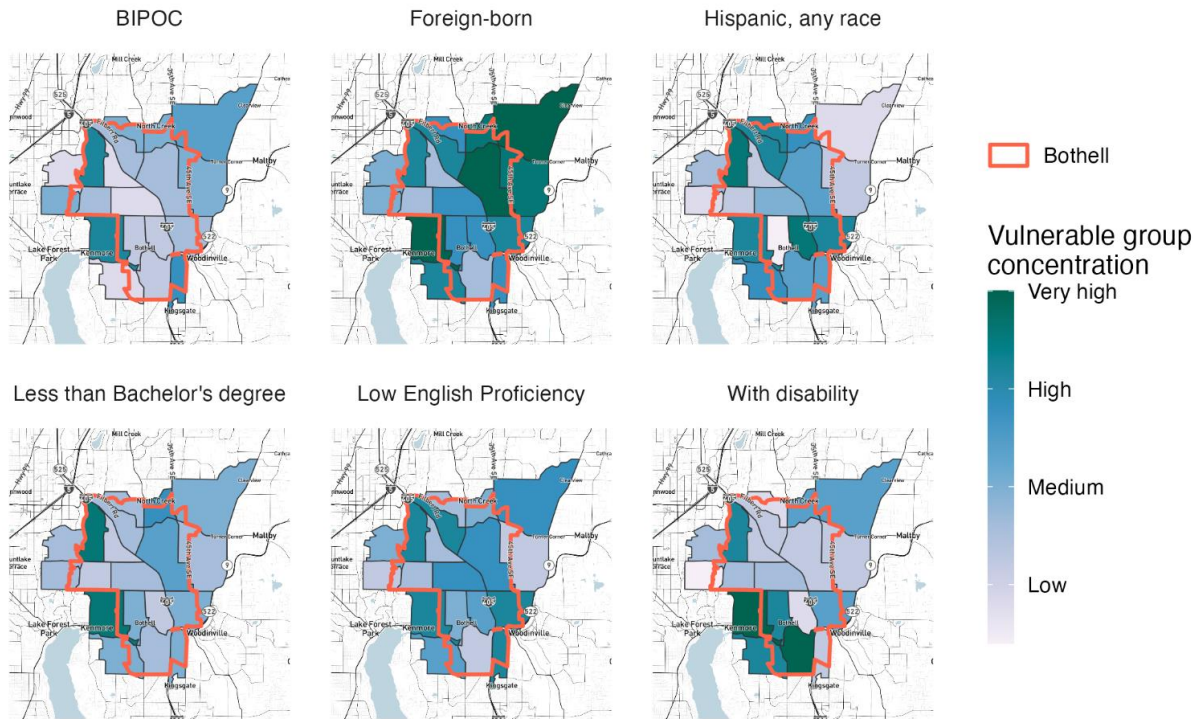


Note: The socioeconomic vulnerability index is a composite index based on 2021 PUMS data measuring where it is more likely that not only current, but where future housing cost burdening and possible displacement are more likely to occur. Displacement risk describes when pressures in the real estate market force households to relocate due to rising housing costs or increased redevelopment potential. The displacement risk mapped here combines the *socioeconomic vulnerability* results with results of a *feasibility analysis* that identifies places with greater chances of middle housing development.

Sources: Public-Use Microdata Survey (PUMS), 2021; Bothell Middle Housing Market Analysis and Feasibility Assessment (ECONorthwest), 2023; Diversity, Equity, Inclusion, and Anti-Displacement Analysis (Otak and ECONorthwest), 2023.



Exhibit B-49. Social Vulnerability Index-Facet Map



Sources: PUMS, 2021; ECONorthwest, 2023.

Racially Disparate Impacts

New State and County requirements call for cities to assess whether racially disparate housing impacts are happening in their community, and to address them through policy and regulatory change. The requirements are not a charge against current communities in which there are racially disparate outcomes in housing, but an acknowledgement of the role land use policy has played in creating and institutionalizing race-based advantages and disadvantages.¹⁸ The statute uses the term “racially disparate” but does not identify protected groups based on race. Racially disparate impacts occur when policies, practices, rules, or other systems result in a disproportionate effect on one or more racial groups. Disparities in housing measures among different racial and ethnic groups are evidence of racially disparate impacts.

The June 2023 [Diversity, Equity, Inclusion, and Anti-Displacement Analysis](#) reviewed the City's Comprehensive Plan, Subarea Plans, and relevant municipal code sections for their capacity to support or hinder diversity, equity, inclusion, and anti-displacement efforts.

A community's current housing situation is the product of many forces including historical factors, policy, regulations, macroeconomic changes, lending practices, cost of development, and individual preference. City governments cannot control all of these factors, but they can change local land use policies and

¹⁸ See Commerce's Racially Disparate Impacts guidance at <https://www.commerce.wa.gov/serving-communities/growth-management/growth-management-topics/planning-for-housing/updating-gma-housing-elements/>.



regulations. Local land use policies and regulations have a significant impact on accessibility of housing for different households. As such, they are a key tool the City can use to address racially disparate impacts.

The City and consultant team used several measures to explore whether racially disparate impacts exist in Bothell. Some of these measures were covered earlier in this document, such as rates of homeownership, household income, and cost-burdened status by racial and ethnic groups. Homeownership rates were slightly lower among household of Color with the lowest rates of ownership among Black and Hispanic/Latino households (see **Exhibit B-12**). Renter households are significantly more likely to be cost-burdened in Bothell (

Exhibit B-38). White renter households are slightly more likely to be cost-burdened than households of Color (43% versus 37%, respectively; **Exhibit B-41**). Overall, Hispanic/Latino households have the highest rates of cost-burden (**Exhibit B-39**), with a particularly high discrepancy between Hispanic/Latino owner households and other owner households by race and ethnicity (**Exhibit B-43**). A higher percentage of Hispanic/Latino households are also extremely low- or very low-income (**Exhibit B-19**). Asian households have the second highest percentage of above median income households of any racial group in Bothell, but of households that rent, Asian households are the most likely to be severely cost-burdened (**Exhibit B-19** and **Exhibit B-41**).

The team also considered the proportion of communities of color in Bothell to King and Snohomish counties and the geographic distribution of race and ethnicity within Bothell to assess possible exclusion in housing. The distribution of population by race as compared to the counties is generally similar, with a higher proportion of residents that are Asian alone than Snohomish County overall and a lower proportion of Black or African-American residents than Snohomish or King counties (**Exhibit B-5**). Within Bothell, the distribution of racial/ethnic groups across the city (**Exhibit B-7**) suggests that while there is not complete exclusion in neighborhoods, People of Color are more disposed to living in areas with multi-unit housing formats. This highlights that there will be notable equity considerations with affordable housing preservation versus efforts to intensify residential densities in existing areas with these housing formats. Some, though not all, of the densest and most racially and ethnically diverse neighborhoods in Bothell also overlap with concentrations of socioeconomic vulnerability and displacement risk to the east, west, and south of Downtown (see **Exhibit B-48**).

Another measure used to assess whether racial and ethnic segregation is happening in Bothell is PSRC's dissimilarity index. PSRC's dissimilarity index is a statistical method for measuring segregation based on the demographic composition of an area and smaller geographic units within that area. One way of understanding the index is that it indicates how evenly two demographic groups are distributed throughout an area: if the composition of both groups in each geographic unit (e.g., Census block group) is the same as in the area as a whole (e.g., city), then the dissimilarity index score for that city will be 0 (suggesting no segregation). By contrast if one population is clustered entirely within one Census block group, the dissimilarity index score for the city will be 1 (complete segregation). The higher the dissimilarity index value, the higher the level of segregation in an area.¹⁹ Generally, areas with a dissimilarity index score

¹⁹ U.S. Census, [Housing Patterns: Appendix B: Measures of Residential Segregation](#), 2021.



above 0.4 are considered more highly segregated. Scores between 0.3 and 0.39 are associated with moderate segregation, and scores below 0.3 are considered to have a low level of segregation.²⁰

This methodology, as applied here, evaluates each of the largest non-white groups relative to the white population in Bothell. The scores therefore only represent the level of segregation between each group (Asian alone, Black alone, Hispanic/Latino, and all BIPOC) and the white alone population. A similar analysis could be done to compare non-white groups to each other (e.g., Asian alone to Black alone, or Black alone to Hispanic/Latino, etc.) to understand other dynamics; however, given the history of exclusionary housing practices in many places along with current residential trends, using the white alone population as a point of comparison for understand relative segregation is often a useful starting point for evaluating disparate impacts related to housing.

Exhibit B-50 shows dissimilarity indexes for Bothell and King and Snohomish counties. Based on this data Bothell has a low level of segregation within its borders. Bothell also has a lower level compared to King and Snohomish counties. This suggests that segregation is not a racially disparate impact that exists within Bothell's current community.

Exhibit B-50. Dissimilarity Index for Bothell Compared to King and Snohomish Counties as a Whole, 2020

	Asian Alone	Black Alone	Hispanic or Latino	All BIPOC
Bothell	0.26	0.24	0.17	0.16
King County	0.35	0.50	0.32	0.28
Snohomish County	0.40	0.41	0.25	0.25

Source: U.S. Decennial Census, 2020; BERK, 2023.

Overall, the analysis shows evidence of racially disparate impacts in Bothell. The regional history of racially exclusive and discriminatory land use and housing practices has been documented by the Puget Sound Regional Council (PSRC)'s Legacy of Structural Racism interactive report²¹ and in a resource document prepared by King County.²² Books such as *The Color of Law* by Richard Rothstein document the nation-wide history.

Housing Policy Evaluation

The June 2023 [Diversity, Equity, Inclusion, and Anti-Displacement Analysis](#) also reviewed the City's current Comprehensive Plan, Subarea Plans, and relevant municipal code sections for their capacity to support diversity, equity, inclusion, and anti-displacement. Supportive themes present in existing policies and code included transit-oriented development and pedestrian-oriented commercial areas and buildings, diverse

²⁰ [PSRC Dissimilarity Index and U.S. HUD guidelines](#), 2023.

²¹ PSRC, [Legacy of Structural Racism](#), 2023.

²² King County, [Resources for Documenting the Local History of Racially Exclusive and Discriminatory Land Use and Housing Practices](#), 2023.



and robust transportation options, locating housing near employment, protecting the affordability of commercial space, and a diversity of public services and commitment to filling gaps in some services.

Conversely, policies and code were also identified that work against diversity, equity, inclusion, and anti-displacement efforts, or policies that could be added to make these documents more supportive of these efforts. Themes identified include:

- Lack of explicit goal, policy, or action that targets inclusion or equity or aims to minimize physical, economic, or cultural displacement in a residential or commercial setting.
- Minimal emphasis on the use of demographic and socioeconomic data in prioritizing locations for public investments or monitoring success in diversity, equity, and inclusion across subject areas.
- Use of exclusive terminology such as “citizen” or “protecting” or “maintaining” character / identity
- Use of vague terminology that has historically been used to exclude or could be exclusionary (character, appropriate, image, compatible, adequate, cultural, desired).
- Need for equity in engagement via proactive outreach to historically underrepresented populations and materials in multiple languages.
- High priority placed on preservation of “history” that does not specifically acknowledge Bothell’s history of BIPOC experiences or potential for historic preservation to be used as an exclusionary tool.
- Lack of sensitivity around “enforcement” and how it is experienced differently by different people.
- Given historical inequities regarding exposure to pollutants, missing prioritization of environmental degradation in areas with more historically underrepresented populations.
- Need for minimizing concentrated poverty or amassed failing infrastructure and/or low levels of service in specific neighborhoods or areas.
- Minimal relocation or anti-displacement incentives.
- Fee structures that do not consider outsized cost impact on lower-income participants.
- Little mention of accessibility to goods, services, and pedestrian infrastructure for the disabled.

Some of these policies, or lack thereof, were identified as particularly detrimental to efforts to provide a robust housing stock with options for all of Bothell’s households, especially its most vulnerable:

- “Protection” of “single family” housing in many neighborhoods.
- Limiting neighborhoods to “detached” housing.
- Restricting special needs housing, senior housing, and daycare to specific overlays or zones rather than permitting these uses in residential zones that would provide equal access to amenities and services and potentially add supply.
- Lack of plan or code language in support of middle housing types such as duplex, triplex, fourplex, cottage, or courtyard housing.²³
- Potentially unnecessarily inflexible dimensional standards for residential lots that limit feasibility of certain housing types.

²³ Note that Ordinance 2407, passed by City Council in December 2023, revised language in the Comprehensive Plan to allow and support middle housing typologies. Supporting code amendments have not yet been adopted, but Council formally stated their intent to adopt development regulations corresponding with the Comprehensive Plan changes in Ordinance 2407.



B.3 GAP ANALYSIS

The goals of this section are to:

- Summarize existing housing needs based on existing conditions, displacement risk, and racially disparate impacts (see [Section B.1](#) and [Section B.2](#))
- Update Bothell's housing and job capacity data to reflect recent development and pipeline projects.
- Determine how much housing capacity there is under current zoning that could potentially be developed to serve different household income levels and meet emergency housing needs in the future.
- Summarize surplus or deficit housing capacity to serve different income levels and meet emergency housing needs.
- Determine how much job capacity there is under current zoning and summarize surplus or deficit job capacity.

Current Housing Needs

The following is a summary of Bothell's current housing needs, based on the information presented in see [Section B.1](#) and [Section B.2](#).

Housing Affordability

The number of households that are cost-burdened is a good indicator of current housing affordability needs. Citywide, one in every four Bothell households are cost-burdened (

[Exhibit B-38](#)). As described above, housing affordability needs are disproportionate across tenure, income groups, and racial and ethnic groups:

- Renter households with incomes at or below 50% AMI were most likely to experience cost burden—about four out of five of these households were cost burdened ([Exhibit B-40](#)). Over half (55%) of renter households with incomes between 50 – 80% of AMI also experienced cost burden, as did over a third (34%) of renter households with incomes between 80 – 100% AMI. White and Hispanic/Latino renter households are slightly more likely to be cost-burdened than households of Color (43% and 42% versus 37%, respectively). Of households that rent, Asian households are the most likely to be severely cost-burdened, followed by White and Hispanic or Latino households. This indicates more vulnerability to displacement risk. See [Exhibit B-41](#).
- Cost burden status for owner households is more consistent across income level than for renter households ([Exhibit B-42](#)), although a greater proportion of owner households at the lowest income levels experience cost burden—about three out of five of owner households with incomes at or below 50% are cost burdened compared to two out of five owner households with incomes between 50 – 80% of AMI. White owner households and owner households of Color have similar rates of cost burden, although a higher percentage of White households are severely cost burdened. Hispanic/Latino households have the highest rate of cost burdened amongst owner households in Bothell (35%). See [Exhibit B-43](#).



The jobs to housing ratio is another measure used to understand whether there is an adequate supply of housing to support local employment in a community. As of 2022, the jobs to housing ratio in Bothell was 1.57 (32,421 jobs divided by 20,585 units in city limits), slightly higher than the balanced range of 0.75 – 1.5 and higher than the ratio in 2021 of 1.53 (30,977 jobs divided by 20,297 units), suggesting that housing supply and affordability are growing concerns.

One likely reason for the housing affordability needs in Bothell is the challenging trend in rising housing costs (**Exhibit B-46**). Other reasons are that Bothell's existing housing inventory consists primarily of larger detached homes (**Exhibit B-29**), and smaller units and rental options are limited to certain neighborhoods in the city. Single-family and owned housing are typically more costly than multiunit and rental housing.

Diversifying the city's housing stock to include more smaller unit, multiunit, and rental housing could potentially lower housing costs overall. The real estate market in Bothell is moving in this direction but likely not at the pace required to meet housing needs. About 70% of new housing units produced in Snohomish from 2011 to 2023 were detached single family homes. The opposite was true in King County, where 68% of new units were in multifamily structures with five or more units. In both counties, middle housing with 2 to 4 units in structure and ADUs comprised a relatively small share of overall housing production. See **Exhibit B-36** and **Exhibit B-37**.

For the lowest income households, often the market does not produce affordable housing even if a diverse range of housing types is built. In these cases, income-restricted or government supported affordable housing can be part of the solution. Currently income-restricted housing units make up only about 3% of the existing housing stock in the city. The data in **Exhibit B-40** and **Exhibit B-42** indicates there is demand for more income-restricted units across all groups earning below AMI. The City could consider working with partners to fill this gap.

Housing Needs of People of Different Ages & Abilities

There is a possible gap in housing options for people in their 20s and 30s and for senior households. A smaller proportion of current Bothell's population are in their 20s and 30s compared to King and Snohomish counties (**Exhibit B-2**). One reason for this could be a gap in housing options for this demographic. Most rental units have 1 or 2 bedrooms (73%; see **Exhibit B-30**), but average rents increased between 31% for studios up to 42% for 3-bedroom units between 2015 and 2023 (**Exhibit B-45**). Ownership costs may also be too high for many people looking to purchase a first home (**Exhibit B-46**).

The UW Bothell and Cascadia also include substantial student populations, most of whom currently commute onto campus for instruction. Long term, the campus is planning for approximately 600 – 1,200 student residents on campus (or 10-20% of its planned student population)²⁴ which means a substantial portion of students would still be looking for off campus housing. Average rents in Bothell are high (**Exhibit B-45**) and may be out of budget for many students. Stakeholder interviews completed as part of the Comprehensive Plan update effort indicated many current students struggle to find affordable housing in Bothell and that some students are forced to drop out because of the long-commutes.²⁵ More

²⁴ UW Bothell and Cascadia College Campus Master Plan, 2017.

²⁵ See the summary of engagement in **Appendix A**. Personal communication with Tamara Wood, student at UWB, May 2023.



housing options close to campus that are affordable to the student population could bring additional activity into the Downtown area that would support other economic development goals for the City.

Bothell's population also includes notable amounts of people in their 40s and 50s—a greater proportion of Bothell's population is in their 40s and similar proportion are in their 50s compared to King and Snohomish counties (**Exhibit B-2**). If these residents desire to stay in the community as they age, there may be growing demand for housing accessible to seniors or for smaller units as children leave home. Bothell's proportion of older adults in their 60s and 70s has also increased since 2010 (**Exhibit B-3**), suggesting there is already a growing need for housing accessible to older adults.

Approximately 9% of Bothell residents live with one or more disabilities, including about 5% that live with an ambulatory difficulty and 4% with an independent living difficulty (**Exhibit B-10**). As Bothell's population ages there could be an increasing need for housing and support services for people with disabilities.

Housing Needs Related to Racially Disparate Impacts & Displacement Risk

New state, regional, and county requirements call for cities to assess whether racially disparate housing impacts are happening in their community and whether there are areas at higher risk of displacement. If these things are found, they need to be addressed through policy and regulatory change.

Bothell has racially disparate impacts. These include lower rate of homeownership among households of Color (**Exhibit B-12**), higher rates of cost-burden for Hispanic/Latino households (with a particularly high discrepancy between Hispanic/Latino owner households and other owner households by race and ethnicity; **Exhibit B-39** and **Exhibit B-43**), and higher rates of severe cost-burden for Asian households that rent (**Exhibit B-41**). The distribution of racial/ethnic groups across the city suggests that while there is not complete exclusion in neighborhoods, people of color are more likely to be living in areas with multi-unit housing formats (**Exhibit B-7**). Some, though not all, of the densest and most racially and ethnically diverse neighborhoods in Bothell also overlap with concentrations of socioeconomic vulnerability and displacement risk to the east, west, and south of Downtown (**Exhibit B-48**). Areas of high development propensity and with a high socioeconomic vulnerability index include residential neighborhoods east of I-405 (Bloomberg Hill and North Creek/195th neighborhoods) and the south end of the Westhill neighborhood. Diversifying housing options could be one way to help address these racially disparate impacts and reduce displacement risk.

Bothell's GMA Growth Targets

In 2021, the WA State Legislature passed House Bill 1220 (HB 1220), which amends the Growth Management Act (GMA) to require the housing element of comprehensive plans to include explicit consideration of capacity to meet housing needs for extremely-low to moderately low-income households, permanent supportive housing (PSH), emergency housing and shelters, and duplexes, triplexes, and townhomes.²⁶

²⁶ HB 1220 [Guidance for Evaluating Land Capacity to Meet All Housing Needs](#).



Growth targets over the 20-year planning period in Bothell are set by King and Snohomish Counties specific to the portion of Bothell within each county.²⁷ Citywide, Bothell's adopted housing targets are for 12,782 new units by 2044 with specific targets identified for each county. **Exhibit B-51** summarizes the adopted housing growth targets overall and by income band in the City of Bothell as set in the King and Snohomish County countywide planning policies (CPPs).²⁸ The greatest need for new units is at the lowest end of the affordability spectrum in both counties (less than or equal to 80% AMI). About 5,300 units are needed for households earning 30% AMI or less, including about 1,800 units of permanent supportive housing that include wrap-around services for people who need support to maintain residency. Emergency housing targets are in addition to permanent supportive housing.

Exhibit B-51. City of Bothell Adopted Housing Growth Targets, 2020-2044

County	Total Housing Need	0 – ≤30% AMI		>30 – ≤50% AMI	>50 – ≤80% AMI	>80 – ≤100% AMI	>100 – ≤120% AMI	>120% AMI	Emergency Housing Beds**
		PSH	Non-PSH						
King	5,800*	1,105	2,100	819	654	147	167	808	1,108
Snohomish	6,982	701	1,402	1,411	1,358	33	652	1,425	432

AMI = area median income; PSH = permanent supportive housing.

* King County's adopted housing targets are for 2019-2044. However, data on baseline housing supply in the King County CPPs is estimated using 2020 Office of Financial Management (OFM) data on total housing units, and 2014-2018 Comprehensive Housing Affordability Strategy and 2020 Public Use Microdata Sample data on the distribution of units at different income levels. These data sources are used to align with Department of Commerce countywide need baseline data, even though the King County growth target setting process began in 2019.

** Emergency housing includes emergency housing and shelter and is in addition to permanent housing needs.

Sources: King County Countywide Planning Policies, 2021 (amended 2023 per Growth Management Planning Council Motion 23-1); Snohomish County Countywide Planning Policies, 2022; Snohomish County Housing Characteristics and Needs in Snohomish County, August 2023.

Employment targets per the CPPs are for 9,500 new jobs in the King County portion of Bothell and 8,705 new jobs in the Snohomish County portion of Bothell from 2019-2044 (a total of 18,205 new jobs by 2024).

Capacity Analysis

As described above, the GMA requires that Bothell accommodate all current and projected housing needs at each income level and show capacity for projected job needs under its Comprehensive Plan. The housing analysis requires demonstrating the capacity for new residential construction for housing types to meet housing needs across specific income levels. Citywide, Bothell's adopted targets are for 12,782 new housing units and 18,205 new jobs by 2044 with specific targets identified for each county (see above).

²⁷ The City of Bothell is split between King and Snohomish Counties, meaning its comprehensive plan must be consistent with both sets of CPPs, including the adopted growth targets for each county.

²⁸ King County's adopted housing targets are for 2019-2044. However, data on baseline housing supply in the King County CPPs is estimated using 2020 Office of Financial Management (OFM) data on total housing units, and 2014-2018 Comprehensive Housing Affordability Strategy and 2020 Public Use Microdata Sample data on the distribution of units at different income levels. These data sources are used to align with Department of Commerce countywide need baseline data, even though the King County growth target setting process began in 2019.



Projected housing needs to 2044 by income level are defined by the targets shown in **Exhibit B-51**. The consultant team conducted a land capacity analysis based on existing land use and development regulations to measure capacity for new residential construction and jobs as compared to these targets, consistent with guidance provided by the Washington State Department of Commerce (Commerce).²⁹

A brief overview of the major steps used in this analysis is included below.

Step 1: Summarize land capacity for housing production and commercial square footage by zone.

All parcels were classified by their development status:

- **Pipeline** parcels already have a permit application and are anticipated to be developed during the planning period, but no land use records exist of the improvements. This also includes parcels where development was completed after the baseline year but records have not been updated. These developments contribute to the city's expected growth over the planning period, and are included as a result.
- **Vacant** parcels have no structures onsite, or minimal improvement value consistent with no significant structures. These parcels could potentially see new development without the need for demolishing existing usable structures.
- **Under-developed** parcels have sufficient development potential to attract new construction, either infill development where the existing structure remains, or redevelopment where current improvements are demolished. Note that in the case of redevelopment, this would be expected to result in a significant increase in development intensity.
- **Partially-utilized** parcels have an existing structure but are large enough to be subdivided into additional developable lots. These can accommodate infill development. Note that this classification is only used for residential lots that would need to consider lot subdivision; multifamily housing and mixed-use projects are only considered "underdeveloped."
- **Developed** parcels are already developed and do not meet the criteria of any of the above categories, meaning that they are unlikely to experience any development that would increase their intensity of use. These are excluded from consideration in the capacity analysis.³⁰
- **Undevelopable** parcels are unsuitable for development due to site conditions. This may include small parcels that cannot accommodate structures, parcels with unsuitable geometries, sites which are not developable due to critical areas or hazards, properties expected to remain in public use, and locations otherwise identified as not practical for development.

For vacant, under-developed, and partially developed parcels, potential development capacities were evaluated by excluding critical areas and existing development expected to remain on a site after an infill project. The **base housing capacity** on the site was calculated as follows:

²⁹ See [Guidance for Updating Your Housing Element Book 2](#) (Commerce, 2023).

³⁰ Note that "developed" parcels can include properties with structures that may be depreciated but would only be demolished to rebuild new structures using the same development capacity, resulting in no net change in housing units, housing types, or commercial floor area.



- For smaller residential developments (e.g., single-unit residential, plex development, townhomes, and ADUs), the number of units per lot was calculated on parcels based on the size of the parcel and development regulations.
- For larger residential developments (e.g., multi-unit and mixed-use projects), a proposed development size was calculated based on the floor-area ratio (FAR) allowed, with the number of units calculated based on an average unit size. Note that in mixed-use zones, the development was divided between commercial and residential components.

The **base job capacity** on a site was calculated as follows:

- For areas where only commercial development is allowed, a proposed development size was calculated based on the FAR allowed, with the number of jobs calculated based on an average job density (one job per 350 square feet).
- In mixed-use zones, the development was divided between commercial and residential components with a given percentage of floor area assigned to employment uses and the number of jobs calculated based on the same average job density.

Exhibit B-53 crosswalks the existing zoning and land use designations to the land use categories used in the capacity analysis (mapped in **Exhibit B-52**) and **Exhibit B-54** lists the development density and type assumptions made for each land use category.³¹

Finally, existing units and commercial square footage were subtracted on redevelopable sites to determine the estimated capacity for net new housing development or commercial square footage, considering necessary demolitions. This amount was aggregated by land use category. **Exhibit B-55** and **Exhibit B-56** show the calculated gross, existing, and net housing capacity by unit type based on this analysis under each land use category for King and Snohomish Counties, respectively. **Exhibit B-57** shows the calculated gross capacity on sites where development is possible, as well as the losses of existing commercial floor area, and the net commercial floor area and job capacity (assuming one job per 350 square feet of commercial space) under each land use category for both counties.

While these figures provide total potential capacity, there are reasons why not all of this development capacity would be used by 2044. For example:

- Landowners may have personal, nonmarket uses for the site that override market considerations.
- Owners could decide to bank their land for future use outside of the period.
- Development regulations and market conditions may not support feasible development of these types of projects.
- The site itself may be less suitable for development for other reasons that would not be recorded in available data.³²

³¹ The City of Bothell's future land use map (FLUM) and zoning map are currently identical to one another, meaning there is essentially a one-to-one relationship between the land use designation and implementing zone. A FLUM with consolidated land use categories was created for the purposes of comparing existing capacity to capacity under proposed growth alternatives.

³² See the definition provided under [WAC 365-196-310\(4\)\(b\)\(iii\)\(F\)](#).



To represent these considerations at a high level, a land market supply factor was provided to adjust the base capacity to consider the potential capacity that would not be available over the long term.³³ For this assessment, these “market factors” were based on the type of development:

- 50% of calculated capacity was assumed to be available for vacant lands.
- 25% for partially utilized sites available for redevelopment.
- 30% for sites with severable lots.
- 15% for sites that could accommodate infill development.

Note that other considerations were included in the development of this capacity analysis:

- Developing common factors for the entire city in this case is challenging, as Buildable Lands Reports for King and Snohomish Counties provide different parameters. In this case, the parameters are assumed to be appropriate given that site heavily encumbered by critical areas and other factors related to potential challenges with these sites.
- As indicated above, pipeline development was included based on assessments by City staff on recent projects that were not reflected in the baseline data used. These were limited only to larger projects of at least 20 housing units or more than 10,000 square feet of commercial space.
- Capacity calculations may notably differ from other studies as this analysis is based on the consolidated Future Land Use Map provided in [Exhibit B-52](#) and common factors are used across the city. This provides ease of use and ensures that this represents high-level policy direction, but differences in zoning will mean that actual capacity will depend on final development regulations.
- Changes in ADU regulations from [HB 1337](#) passed in 2023 permits property owners to build two ADUs as of right on a site and relaxed minimum size requirements for these units.³⁴ At the time of the analysis, it is not clear how this would be reflected in the actual construction of housing units, as this could likely form a substantive amount of infill but may or may not be incorporated into new projects. The five-year update should specifically examine this split to ensure that production of these units is sufficient.

³³ See [Buildable Lands Guidelines](#) (Commerce, 2018) for more information on the land market supply factor.

³⁴ See also [RCW 36.70A.681\(1\)\(c\)](#).

Bothell City Limits
Bothell MUGA
County Boundary

NO ACTION

Downtown
 D/T, Downtown/Transition
 D/G, Downtown/Gateway
 D/C, Downtown/Core
 D/N, Downtown/
 Neighborhood

Commercial/Employment
 C/G, Commercial/General
 E/M, Employment/Medium
 E/L, Employment/Low

Mixed-Use
 MU/E, Mixed-Use/
 Employment
 MU/C, Mixed-Use/
 Community
 MU/N, Mixed-Use/
 Neighborhood

Residential
 R/M, Residential/Medium
 R/L, Residential/Low
 R/C, Residential/
 Conservation
 R/MHP, Residential/
 Manufactured Home Park

Public/Semi-Public
 P/I, Public & Institutional
 P/OSP, Open Space & Park

UNINCORPORATED SNOHOMISH COUNTY

196 ST SE (GRANNIS RD)

YORK RD

43 AVE SE

212 ST SE

39 AVE SE

45 AVE SE

220 ST SE

228 ST SE

35 AVE SE

240 ST SE

130 AVE NE

124 AVE NE

NE 160 ST

BRICKWARD RD

NE 195 ST

BEARDSLEE BLVD

NE 190 ST

NE 180 ST

88 AVE NE

92 AVE NE

100 AVE NE

104 AVE NE

242 ST SE

15 AVE SE

19 AVE SE

23 AVE SE

7 AVE SE

228 ST SW

4 AVE W

214 ST SW

9 AVE SE

FILBERT DR

DAMSON RD

CYPRESS WAY

LOCUST WAY

M-VAW-71

CARTER RD

80 AVE NE

KING COUNTY

KENMORE

WATKINS WAY NE

522

405

KIRKLAND

WOODINVILLE

Imagine Bothell Comprehensive Plan
Public Review Draft April 2024



Exhibit B-53. Land Use Categories for Capacity Analysis

Land Use Category for Capacity Analysis	Land Use Code	Current Zoning / Land Use	Land Use Category for Capacity Analysis	Land Use Code	Current Zoning / Land Use	Land Use Category for Capacity Analysis	Land Use Code	Current Zoning / Land Use
Commercial / General	C/G	GC OP, CB, GC			R 5,400a, OP R-AC, OP, CB, LI, MVSO R-AC, OP, LI	Residential / Medium ¹	R/M	R 2,800 R 4,000 R 5,400a R 5,400a, LID, NCPA R 5,400a, NCPA R 5,400d R 5,400d, SSHO SVV
Downtown / Core	D/C	DC						
Downtown / Gateway	D/G	522 GDC						
Downtown / Neighborhood	D/N	DN	Mixed Use / Neighborhood	MU/N	NB R 2,800, OP, NB R-AC, OP, NB RMU-M			
Downtown / Transition	D/T	DT						
Employment / Low	E/L	E-L	Public / Institutional	P/I	(special)			
Employment / Medium	E/M	E-M E-M, AQB R-AC, OP, CB, LI	Public / Open Space & Parks	P/OSP	AG PPOS	Residential / Manufactured Home Park	R/MHP	522, MHP MHP R 2,800, MHP R 4,000, MHP R 9,600, MHP
Mixed Use / Community	MU/C	OP R 2,800, OP, CB R 4,000, OP, CB R-AC, OP, CB RMU-H	Residential / Conservation	R/C	R 40,000 R 40,000, LID, NCPA			
			Residential / Low	R/L	R 7,200 R 8,400 R 9,600 R 9,600, KGC R 9,600, LID, NCPA R 9,600, NCPA R 9,600, SSHO			
Mixed Use / Employment	MU/E	OP, GC OP, LI OR-H OR-H, AQB OR-L OR-M R 2,800, OP R 2,800, OP, LI						

¹ Includes the Downtown/Sunrise Valley View (D/SVV) land use designation in the Downtown Subarea (shown as R/M on the FLUM).
Source: BERK, 2024.

**Exhibit B-54. Land Use Capacity Assumptions—Existing**

Land Use Category	Regulation by FAR					Regulation by Unit Density						
	Target FAR	Max. Height	Site Efficiency	% COM	% MUR	Minimum Lot Size (ft ²)	Minimum Footprint (ft ²)	SUR Max. Units/Lot	% ADU Units	% SUR Units	% TH / Plex Units	% MF Units
C/G	2.00	3.0	60%	100%	—	—	—	—	—	—	—	—
D/C	4.00	6.0	80%	30%	70%	—	—	—	—	—	—	—
D/G	2.50	5.0	80%	40%	60%	—	—	—	—	—	—	—
D/N	2.50	4.0	80%	20%	80%	—	—	—	—	—	—	—
D/T	2.50	3.0	80%	20%	80%	—	—	—	—	—	—	—
E/L	2.00	5.0	80%	100%	—	—	—	—	—	—	—	—
E/M	2.50	5.0	80%	100%	—	—	—	—	—	—	—	—
MU/C	2.50	3.0	80%	30%	70%	—	—	—	—	—	—	—
MU/E	2.50	3.0	80%	50%	50%	—	—	—	—	—	—	—
MU/N	2.50	3.0	80%	20%	80%	—	—	—	—	—	—	—
P/I	—	—	—	—	—	—	—	—	—	—	—	—
P/OSP	—	—	—	—	—	—	—	—	—	—	—	—
R/C	—	—	—	—	—	40,000	4,000	1	10%	90%	—	—
R/L	—	—	—	—	—	7,200	1,500	2	30%	40%	30%	—
R/M ¹	—	—	—	—	—	4,000	800	2	—	—	75%	25%
R/MHP ²	—	—	—	—	—	—	—	—	—	—	—	—

Notes: FAR = floor area ratio. % MUR = percentage of floor area as multi-unit residential (e.g., apartments or condominiums in low or mid-rise buildings). % COM = percentage of floor area as commercial. % SUR units = percentage of housing units as single-unit residential units (e.g., detached “single family” homes). % ADU units = percentage of housing units as accessory dwelling units. % TH / Plex units = percentage of housing units as small format multifamily housing units (e.g., townhomes, duplex, triplex, or quadplex). % MF units = percentage of housing units as smaller-format multifamily / missing middle housing types such as garden apartments.

¹ Includes the Downtown/Sunrise Valley View (D/SVV) land use designation in the Downtown Subarea (shown as R/M on the FLUM).

² Manufactured Home Parks (R/MHP) are assumed to be built out with no additional development capacity available given expected affordable housing protections on these sites.

Source: BERK, 2024.

**Exhibit B-55. Current Housing Capacity by Land Use Category (Units)—King County**

Land Use Category	Gross Capacity by Type				Existing Housing on Developable Land				Net Residential Capacity			
	SUR	TH/Plex	ADU	MUR	SUR	TH/Plex	ADU	MUR	SUR	TH/Plex	ADU	MUR
C/G	—	—	—	—	-1	—	—	—	-1	—	—	—
D/C	—	—	—	294	-1	—	—	—	-1	—	—	294
D/G	—	—	—	1,161	-1	-1	—	-5	-1	-1	—	1,156
D/N	—	—	—	555	-1	—	—	—	-1	—	—	555
D/T	—	—	—	577	-4	-2	—	—	-4	-2	—	577
E/L	—	—	—	—	—	—	—	—	—	—	—	—
E/M	—	—	—	—	—	—	—	—	—	—	—	—
MU/C	—	—	—	369	-1	—	—	—	-1	—	—	369
MU/E	—	—	—	2,400	-2	—	—	-20	-2	—	—	2,380
MU/N	—	—	—	1,145	-1	—	—	—	-1	—	—	1,145
P/I	—	—	—	—	—	—	—	-25	—	—	—	-25
P/OSP	—	—	—	—	-1	—	—	—	-1	—	—	—
R/C	35	—	4	—	-14	—	—	—	21	—	4	—
R/L	584	438	439	—	-172	-1	—	—	412	437	439	—
R/M ¹	—	151	—	—	-17	-1	—	—	-17	150	—	—
R/MHP ²	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	621	490	442	6,501	-214	-5	0	-50	407	585	442	6,451

Notes: SUR = single unit residential units (e.g., detached “single family” homes). TH/Plex = small-format multifamily housing units such as townhomes, duplex, triplex, or quadplex. ADU = accessory dwelling units. MUR = multi-unit residential units (e.g., apartments or condominiums in low or mid-rise buildings).

¹ Includes the Downtown/Sunrise Valley View (D/SVV) land use designation in the Downtown Subarea (shown as R/M on the FLUM).

² Manufactured Home Parks (R/MHP) are assumed to be built out with no additional development capacity available given expected affordable housing protections on these sites.

Source: BERK, 2024.

**Exhibit B-56. Current Housing Capacity by Land Use Category (Units)—Snohomish County**

Land Use Category	Gross Capacity by Type				Existing Housing on Developable Land				Net Residential Capacity			
	SUR	TH/Plex	ADU	MUR	SUR	TH/Plex	ADU	MUR	SUR	TH/Plex	ADU	MUR
C/G	—	—	—	—	—	—	—	—	—	—	—	—
D/C	—	—	—	—	—	—	—	—	—	—	—	—
D/G	—	—	—	—	—	—	—	—	—	—	—	—
D/N	—	—	—	—	—	—	—	—	—	—	—	—
D/T	—	—	—	—	—	—	—	—	—	—	—	—
E/L	—	—	—	—	—	—	—	—	—	—	—	—
E/M	—	—	—	—	—	—	—	—	—	—	—	—
MU/C	—	—	—	407	-4	-34	—	-37	-4	-34	—	370
MU/E	—	—	—	844	-6	-21	—	-26	-6	-21	—	818
MU/N	—	—	—	16	-1	—	—	-1	-1	—	—	15
P/I	—	—	—	—	—	—	—	—	—	—	—	—
P/OSP	—	—	—	—	—	—	—	—	—	—	—	—
R/C	22	—	2	10	-10	-1	—	-10	12	-1	2	—
R/L	1151	863	863	811	-786	-25	—	-813	365	838	863	-2
R/M	—	176	—	94	-34	-1	—	-35	-34	175	—	59
R/MHP	—	—	—	63	—	-63	—	-63	-0	-63	—	—
Subtotal	1,173	1,040	866	2,245	-840	-143	0	-985	333	897	866	1,260

Notes: SUR = single unit residential units (e.g., detached “single family” homes). TH/Plex = small-format multifamily housing units such as townhomes, duplex, triplex, or quadplex. ADU = accessory dwelling units. MUR = multi-unit residential units (e.g., apartments or condominiums in low or mid-rise buildings).

Source: BERK, 2024.

**Exhibit B-57. Current Commercial Square Footage and Job Capacity by Land Use Category**

Land Use Category	King County				Snohomish County			
	Gross Capacity (ft ²)	Loss of Existing Space to Redev. (ft ²)	Net Capacity (ft ²)	Net Capacity (Jobs)*	Gross Capacity (ft ²)	Loss of Existing Space to Redev. (ft ²)	Net Capacity (ft ²)	Net Capacity (Jobs)*
C/G	133,665	-4,252	129,414	370	98,748	-5,349	93,399	267
D/C	113,441	-11,216	102,226	292	—	—	—	—
D/G	696,778	-47,716	649,062	1,854	—	—	—	—
D/N	124,867	-20,779	104,088	297	—	—	—	—
D/T	129,903	-31,329	98,574	282	—	—	—	—
E/L	—	—	—	—	1,560,427	—	1,560,427	4,458
E/M	2,092,731	—	2,092,731	5,979	865,860	—	865,860	2,474
MU/C	142,181	-1,275	140,906	403	444,277	-61,038	383,239	1,095
MU/E	2,159,818	-42,309	2,117,509	6,050	1,298,694	-64,683	1,234,011	3,526
MU/N	257,561	-14,082	243,479	696	36,167	-7,145	29,022	83
P/I	—	-10,282	-10,282	-29	—	—	—	—
P/OSP	—	—	—	—	—	—	—	—
R/C	180	-518	-337	-1	100	—	100	—
R/L	5,145	-2,429	2,716	8	7,678	-10,692	-3,014	-9
R/M ¹	800	-1,802	-1,001	-3	848	—	848	2
R/MHP	—	-1,450	-1,450	-4	—	—	—	—
Subtotal	5,857,072	-189,436	5,667,636	16,193	4,312,799	-148,907	4,163,892	11,897

Notes: *Assumes 1 job per 350 square feet of commercial space.

¹ Includes the Downtown/Sunrise Valley View (D/SVV) land use designation in the Downtown Subarea (shown as R/M on the FLUM).

Source: BERK, 2024.

Step 2: Classify zones by allowed density level and housing type and relate to potential income levels served.

Different housing types are more suitable for meeting housing needs at different income/affordability levels due in part to significant differences in land and construction costs per unit. In this step, each zone is classified based on the type of housing most likely to be constructed within it, assuming that the full capacity for development is used in the future. **Exhibit B-58** presents four different categories, as well as the lowest level of income that can feasibly be served assuming the new housing is either market-rate or a subsidized affordable housing project. These categories and affordability assumptions are consistent with Commerce guidance for updating housing elements as well as an analysis of housing market conditions in Bothell. The exhibit shows that some housing types are more appropriate for meeting lower income housing needs than other types.


Exhibit B-58. Zone Categories and Potential Income Levels Served in Bothell

Zone Category	Definition	Income Level Served	
		Market Rate	With Subsidies
Low-rise and Mid-rise	Apartments or condominiums in low or mid-rise buildings.	>80%-120 AMI	0-80% AMI
Moderate Density	Small format multifamily housing types such as townhomes, duplex, triplex, or quadplex. Also known as “middle housing”.	>80%-120 AMI & >120% AMI	<i>Not typically feasible at scale</i>
Low Density	Detached “single family” homes.	>120% AMI	<i>Not typically feasible at scale</i>
ADUs	Accessory dwelling units associated with a detached single-family home.	>50-80% AMI & 80-120% AMI	<i>Not typically feasible at scale</i>

Note: Adapted from [Guidance for Updating Your Housing Element](#) (Commerce, 2023).
Source: BERK, 2024.

Step 3: Compare aggregate capacity by zone category to housing need and job targets.

Housing Capacity

The final step to analyze housing capacity is aggregating the capacity for residential growth by zone category and comparing that capacity to Bothell’s target for housing needs. **Exhibit B-59** summarizes the results of the capacity analysis in Steps 1 and 2 above in each county under existing zoning. The net “MUR” capacity from **Exhibit B-55** and **Exhibit B-56** are applied to the low-rise and mid-rise category, the net “TH/Plex” capacity is applied to the moderate density category, the net “SUR” capacity is applied to the low density category, and the net “ADU” capacity is applied to the ADU category.

Exhibit B-59. Summary of Capacity by Existing Zone Category

Zone Category	King			Snohomish		
	Pipeline Capacity	Additional Capacity	Total Capacity	Pipeline Capacity	Additional Capacity	Total Capacity
Low-Rise and Mid-Rise	1,337	6,451	7,788	—	1,260	1,260
Moderate Density	348	585	933	56	897	953
Low Density	—	407	407	—	333	333
ADUs	—	442	442	—	866	866
Total	1,685	7,885	9,570	56	3,355	3,411

Source: City of Bothell, 2024; BERK, 2024.



Exhibit B-60 compares the capacity for net new housing production in Bothell by zone category to housing growth targets by income level. Housing capacity is aggregated by the lowest potential income level served:

- Single-unit residential housing units are assumed to meet “Low Density” housing needs for households at 120% of AMI or above.
- Small-format multifamily housing units such as townhomes, duplexes, triplexes, or quadplexes are assumed to meet “Moderate Density” housing needs for households at 80–120% AMI.
- ADUs and multi-unit residential housing units are assumed to meet the “Low-Rise, Mid-Rise, ADUs” requirements for 0–80% AMI households.

The preliminary surplus/deficit comparison in **Exhibit B-60** simply subtracts the aggregated housing target from the capacity for each income level group. Numbers in red indicate a deficit of capacity compared to the target.

The final column in **Exhibit B-60** adjusts the capacity comparison by shifting surplus capacity from one category to meet a higher income category, where appropriate. For example, both counties show a deficit of capacity for >120% AMI targets. Given that townhomes can be sold at prices only affordable to households with incomes above 120% AMI, surplus capacity in the Moderate Density zone category is shifted to cover this deficit.

Not all deficits can be addressed in this manner. The shortfall of capacity for low-income housing targets in Snohomish County in practice cannot likely be addressed with surplus Moderate- or Low-Density housing capacity.

Based on these adjustments, the city has sufficient capacity to accommodate growth targets in King County. However, in the Snohomish portion there is a deficiency of total housing capacity as well as a deficiency of capacity for multifamily housing types that are essential for accommodating all low-income (0–80% AMI) housing needs. These deficiencies would likely contribute to a lack of affordable housing options and increased housing costs overall.

**Exhibit B-60. Comparison of Existing Housing Capacity to Growth Targets**

Housing Need (% of AMI)	Zone Categories	King				
		2020-2044 Target	Aggregated Target	Capacity	Preliminary Surplus / (Deficit)	Adjusted Surplus / (Deficit)**
0-30% PSH*	Low-Rise, Mid-Rise, ADUs	1,105	4,678	8,230	3,552	3,552
0-30% Non-PSH*		2,100				
>30 to ≤50%		819				
>50 to ≤80%		654				
>80 to ≤100%	Moderate Density	147	314	933	619	218
>100 to ≤120%		167				
>120%	Low Density	808	808	407	(401)	0
Total		5,800	5,800	9,570	3,770	3,770

Housing Need (% of AMI)	Zone Categories	Snohomish				
		2020-44 Target	Aggregated Target	Capacity	Preliminary Surplus / (Deficit)	Adjusted Surplus / (Deficit)**
0-30% PSH*	Low-Rise, Mid-Rise, ADUs	701	4,872	2,126	(2,746)	(2,746)
0-30% Non-PSH*		1,402				
>30 to ≤50%		1,411				
>50 to ≤80%		1,358				
>80 to ≤100%	Moderate Density	33	685	953	268	0
>100 to ≤120%		652				
>120%	Low Density	1,425	1,425	333	(1,092)	(824)
Total		6,982	6,982	3,411	(3,571)	(3,571)

* PSH = Permanent supportive housing.

** The final column shifts surplus capacity from Moderate Density to Low Density, as it is expected some townhomes will serve needs for higher income (>120% AMI) households.

Source: City of Bothell, 2024; BERK, 2024.



Capacity for Permanent Supportive Housing & Emergency Housing

The Commerce land capacity guidance assumes PSH housing can be accommodated in low-rise and mid-rise zones. Capacity calculation for multi-unit residential (e.g., apartments or condominiums in low or mid-rise buildings) are shown in **Exhibit B-55** and **Exhibit B-56** for King and Snohomish counties, respectively. Multi-unit residential capacity is primarily within the Downtown and mixed-use categories (D/C, D/G, D/N, D/T, MU/C, MU/E, and MU/N) as shown in **Exhibit B-52**:

- In King County, these are generally located in the Downtown, Red Barn, and North Creek / 195th neighborhoods.
- In Snohomish County, these are primarily located in the Canyon Park and Red Barn neighborhoods with a small amount of multi-unit residential capacity in surrounding R/M areas.

Emergency housing is temporary shelter for people who are unhoused or at imminent risk of becoming unhoused; it includes housing where people can stay overnight as well as day centers.³⁵ Bothell's 2044 housing growth target for emergency housing is 1,108 units in King County and 432 units in Snohomish County (see **Exhibit B-51**).

As discussed above in **Emergency Housing, Emergency Shelters, & Permanent Supportive Housing** under **Section B.1**, emergency/transitional and permanent supportive housing are not included as a use type in Bothell's land use code but are not explicitly prohibited in any of the zones which allow residential dwelling units or hotels. The City intends to codify zoning regulations for supportive and emergency housing types as part of the Comprehensive Plan periodic update.

Job Capacity

The GMA also requires that Bothell show capacity for projected job needs under its Comprehensive Plan. Per **Exhibit B-57**, Bothell has capacity for 16,193 new jobs in King County and 11,897 new jobs in Snohomish County under current zoning, which is above employment targets for 9,500 new jobs in the King County portion of Bothell and 8,705 new jobs in the Snohomish County portion of Bothell from 2019-2044. Note that this is based on an estimate of job density that assumes 350 square feet per job and the assumption that new employment uses will use available development capacity on identified sites under development regulations.

³⁵ Per GMA definitions and King County Countywide Planning Policy H-3.



B.4 BARRIERS REVIEW

Jurisdictions are not required under GMA to construct housing or ensure housing is produced. They must, however, identify barriers to housing production and make adequate provisions within their power to accommodate all housing needs (see [Exhibit B-51](#) and [Bothell's GMA Growth Targets](#) under [Section B.3 Gap Analysis](#)). Commerce recommends a three-step process for this work:

- Step 1: Review housing production trends to determine if a barrier exists.
- Step 2: Gather information to determine what kind(s) of barriers exist.
- Step 3: Identify and document appropriate programs and actions to overcome each barrier identified.

This section details production trends and documents existing barriers to housing production in Bothell (Steps 1 and 2). Programs and actions needed to achieve housing availability (Step 3) are discussed in [Section B.5 Adequate Provisions](#).

Housing Production Trends Compared to Need

There are several types of barriers that can limit or effectively prohibit the production of housing needed to serve all economic segments. Typically, these barriers increase the cost of development, which makes some projects infeasible. The affordability of new housing depends in part on housing type due to differences in land and construction costs per unit. [Exhibit B-58](#) in [Section B.3 Gap Analysis](#) presents three different zone categories, as well as the lowest level of income that can feasibly be served assuming the new housing is either market-rate or a subsidized affordable housing project. These zone categories and affordability assumptions are consistent with Commerce guidance for updating housing elements as well as an analysis of housing market conditions in Bothell. The exhibit shows that some housing types, and therefore zone categories that support those housing types, are more appropriate for meeting lower income housing needs than others.

[Exhibit B-61](#) presents an analysis of residential development trends compared to housing needs in Bothell to determine if there are barriers to production in any zone category. This analysis is presented separately for King and Snohomish portions of the city. Below is a guide to reading the tables:

- **Columns A and B** show income level and housing types most appropriate for serving that income level. **Column C** identifies the net new housing need by income level from Bothell's growth targets, and **Column D** aggregates these targets by zone category. These columns all mirror the presentation of housing need by zone category in [Exhibit B-60](#).
- **Column E** presents these same aggregated targets on an average annual basis.
- **Column F** presents the actual average annual units produced from 2014 to 2023, based on Bothell permit data. Low Density corresponds to completed detached single-family permits. Moderate Density corresponds to units in structures with 2-4 units, such as duplexes, triplexes, and townhomes with 4 or less units in structure. The remainder of unit production is considered Low-Rise, Mid-Rise, or ADU.
- In cases where the historic average annual production (**Column F**) is lower than the average annual need (**Column E**), this indicates there was a production shortfall. This is evidence there are barriers to housing development that could prevent the City from meeting its growth targets. This finding would be noted as a "Yes" and red cell in **Column G**.



- A production shortfall noted in **Column G** will always indicate there are barriers to production at the corresponding affordability level, as noted in **Column H**. However, there are instances where there are barriers noted in Column H despite no production shortfall, as discussed below.

Exhibit B-61. Production Trends by Housing Type Compared to Need by Income Level

King County

A	B	C	D	E	F	G	H
Housing Need (% of AMI)	Housing Types	2020-2044 Target	Aggregated Target	Avg. Annual Need, 2020-2044	Avg. Annual Production, 2014-2023	Production Shortfall Compared to Need?	Barriers to Production at this Affordability Level?
0-30% PSH	Low-Rise, Mid-Rise, ADUs	1,105	4,678	195	196	No	Yes*
0-30% Non-PSH		2,100					
>30 to ≤50%		819					
>50 to ≤80%		654					
>80 to ≤100%	Moderate Density	147	314	13	8	Yes	Yes
>100 to ≤120%		167					
>120%	Low Density	808	808	32	65	No	No
Total Permanent Housing		5,800	5,800	232	270		
Emergency Housing		1,108	1,108	46	Unknown	Yes	Yes

Snohomish County

A	B	C	D	E	F	G	H
Housing Need (% of AMI)	Housing Types	2020-2044 Target	Aggregated Target	Avg. Annual Need, 2020-2044	Avg. Annual Production, 2014-2023	Production Shortfall Compared to Need?	Barriers to Production at this Affordability Level?
0-30% PSH	Low-Rise, Mid-Rise, ADUs	701	4,872	203	26	Yes	Yes
0-30% Non-PSH		1,402					
>30 to ≤50%		1,411					
>50 to ≤80%		1,358					
>80 to ≤100%	Moderate Density	33	685	29	7	Yes	Yes
>100 to ≤120%		652					
>120%	Low Density	1,425	1,425	59	57	No*	No*
Total Permanent Housing		6,982	6,982	291	91		
Emergency Housing		432	432	18	Unknown	Yes	Yes

* See discussion in text regarding the analysis that led to these conclusions.

Note: PSH = Permanent supportive housing. While additional units of all housing types listed here have been built since 2020, the affordability level of those units is unknown at this time. These units have therefore not been deducted from the overall target to ensure the analysis doesn't imply less remaining need than actually exists.

Source: City of Bothell, 2024; BERK, 2024.



Overall, the King County portion of Bothell has been producing housing units at a rate faster than needed to achieve its total housing growth target. However, the rate of moderate income housing production is not keeping pace with needs. Additionally, while it has produced significantly more low-rise, mid-rise, and ADUs compared to need, most of those new units are market rate and not expected to be affordable to low-income (0-80% AMI) households.³⁶ So, there are still barriers to producing sufficient low-income housing.

The Snohomish County portion of Bothell is falling well short of the total housing production needed to achieve its growth targets. This shortfall applies as well to all three housing types. However, this assessment finds there are no barriers to meeting needs for households with incomes >120% AMI. The historic trend is just barely short of the rate of production needed and it is likely that many new townhomes produced will also be priced at a level that is only affordable to >120% AMI households. Therefore, the barriers that are most important to address are for housing to support low-income (0-80% AMI) and moderate-income (80-120% AMI) housing needs.

Multi-Family Tax Exemption Program

Bothell has a Multi-Family Tax Exemption (MFTE) program to incentivize multifamily housing in designated zones that it adopted in 2021 to cover most multifamily zoning districts in the city.³⁷ As of February 2024, no developers have yet used the MFTE program.

Middle Housing & Accessory Dwelling Units

As discussed above, middle housing with 2 to 4 units in the structure and ADUs have comprised a relatively small share of overall housing production in Bothell in recent years. Since 2011, about 70% of new housing units produced in Snohomish County were detached single family homes and 68% of new housing units produced in King County were in multifamily structures with five or more units (see [Exhibit B-36](#)). Since 2017, Bothell has added a total of 32 ADU's, with growth at its highest in 2020 and 2022 (see [Exhibit B-37](#)). Therefore, there appear to be barriers to both types of housing development.

This is consistent with [Exhibit B-61](#) which shows there may be barriers for housing types needed to accommodate low- (below 80% AMI) and moderate-income (80-120% AMI) housing needs. Of note, City Council recently adopted Ordinance 2407 in December 2023 revising language in the Comprehensive Plan to allow and support middle housing typologies. Supporting code amendments were adopted by Council March 5, 2024 and went into effect March 18, 2024 (Ordinance 2415).

Housing Barriers Checklists

To gather information about what kinds of barriers are hindering the types of housing production needed to meet all housing needs, city staff and consultant team utilized five checklists provided by Commerce to

³⁶ Average annual production of income-restricted affordable housing is impossible to calculate with available data. However, an inventory of known units generated by ARCH shows only 78 units in development as of February 2024, and most projects take more than a year to complete.

³⁷ As per [BMC 3.90.050](#), this covers the R 5,400a, R 4,000, R 2,800, R-AC, Downtown Core, Downtown Neighborhood, Downtown Transition, SR 522 Corridor, General Downtown Corridor, RMU-H, RMU-M, OR-H, OR-M and OR-L zoning districts.



review and summarize local development regulations and process obstacles related to the following housing types:

- Moderate density housing
- Low-rise and mid-rise housing
- Accessory dwelling units
- Permanent supportive housing and emergency housing

A fifth checklist covered local option tools for addressing affordable housing funding gaps, such as incentives to lower costs and taxes to generate revenue to support affordable housing development.³⁸

This checklist review was informed by stakeholder interviews, workgroup findings, staff experience, and the assessment of housing market conditions in Bothell in [Section B.1](#), [Section B.2](#), and [Section B.3](#). Each checklist is included below.

³⁸ Blank checklists can be found in Appendix B of Commerce's Guidance for Updating your Housing Element.

Exhibit B-62. Moderate Density Housing Barrier Review Checklist

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
DEVELOPMENT REGULATIONS			
Unclear development regulations	No. While there are ongoing concerns about maintaining clear language in development regulations, there are no immediate concerns.	<p>There are some major elements in development regulations that have been suggested as confusing in the regulations:</p> <ul style="list-style-type: none"> ○ Certain zones that allow for multifamily housing still permit single-family housing. ○ Subareas plans, especially in the Downtown, consist of hybrid codes that also include form-based regulations. ○ There is some confusion about the development and use of live-work units, especially with respect to home occupation regulations. 	No action is necessary to address barriers, but the City will continue to monitor development regulations and address any issues with clarity that may arise.
Prohibiting some moderate density housing types, such as: <ul style="list-style-type: none"> ○ Duplexes ○ Triplexes ○ Four/five/six-plexes ○ Townhomes ○ Cottage housing ○ Live-work units ○ Manufactured home parks 	No. All residential zones allow middle housing (including duplexes triplexes, fourplexes, townhouses, courtyard apartments, and cottage housing).	<ul style="list-style-type: none"> ○ Ordinance 2415 adopted March 2024 allows middle housing in all residential zones and allows 2–4 units per lot depending on whether the lot is within ¼ mile of a major transit stop and whether affordable units are provided. ○ Ordinance 2407 adopted December 2023 revised the Comprehensive Plan to allow up to 4 units per lot in most areas of the city and would be carried through 	<ul style="list-style-type: none"> ○ No action is necessary to address barriers, but intended changes to the Comprehensive Plan as part of the Periodic Update would include additional upzoning to permit denser housing where supported.

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
		with proposed revisions as part of the Periodic Update	
High minimum lot sizes	Yes. Higher lot sizes have restricted the achievable densities in certain lower-density neighborhoods, especially where moderate-density housing is not permitted.	<ul style="list-style-type: none"> Certain zones in the City under BMC 12.14.030 have high minimum lot sizes, up to a minimum lot size of 8,400 sf. Ordinance 2415 adopted March 2024 added average lot sizes and revised minimums in some zones. Areas which allow smaller lots maintain the same housing unit density. 	<ul style="list-style-type: none"> Intended changes in the Comprehensive Plan would reduce minimum lot sizes citywide, and upzone targeted areas in the city to provide for greater opportunities for development.
Low maximum densities or low maximum FAR	Yes. Additional density allowed for middle housing options could be supported in moderate-density areas where unit densities are used. Increasing these densities could increase both the housing yields and likelihood of development on the site.	<ul style="list-style-type: none"> For R 2,800 to R 5,400a, maximum densities are set based on lot size under BMC 12.14.030 and reflect effective net densities of 8–15 units per acre. Higher-density development is typically preferred for providing sufficient ridership for more frequent transit and neighborhood-oriented businesses. Ordinance 2415 adopted March 2024 allows middle housing in all residential zones and allows 2–4 units per lot depending on whether the lot is within ¼ mile of a major transit stop and whether affordable units are provided. 	<ul style="list-style-type: none"> Intended changes in the Comprehensive Plan would reduce minimum lot sizes and increase effective density and would apply residential upzones in targeted areas.
Low maximum building heights	No. Maximum building heights in low- to moderate-density areas are sufficient to	<ul style="list-style-type: none"> Minimum heights are 30–35 feet for R 2,800 to R 40,000, unless otherwise specified. This is consistent with a 	No action is necessary, but providing future increases in

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
	allow for middle housing development.	maximum of two to three story development.	height may be required with higher densities.
Large setback requirements	Yes. Some setbacks are larger than necessary and could have an impact on housing production to some extent.	<ul style="list-style-type: none"> ○ R 4,000/R 2,800 rear setbacks under BMC 12.14.030(A) are at 25 feet, higher than other comparable residential areas. ○ Increased setbacks between higher and lower density residential. ○ Cluster development provides for greater setbacks. ○ Reductions are possible for larger-scale subdivisions. ○ Ordinance 2415 adopted March 2024 reduced front and rear minimum setbacks to 5 feet for duplex, triplex, and fourplex development under certain conditions. 	<ul style="list-style-type: none"> ○ Review setbacks for residential zones to determine if a reduction of setbacks would address limitations on site development.
High off-street parking requirements	Yes. While there are targeted reductions in the Downtown subarea and close to transit stations, overall parking requirements are high. This can increase the cost of housing development and reduce the effective yields.	<ul style="list-style-type: none"> ○ Citywide, requirements under BMC 12.16.030(A) require 3 spaces per single-family housing unit, and at least 2.2 for multifamily units. ○ Reduced parking requirements for transit proximity, low-income units, senior housing, etc. are provided under BMC 12.16.110. ○ Certain neighborhoods may have no on-street parking provided at certain widths, which may complicate 	Citywide parking regulations should be examined to streamline these requirements and reduce parking requirements citywide (outside the downtown or where other reductions would not apply).

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
		reductions in on-site parking.	
High impervious coverage limits	Yes. Impervious coverage restrictions are based on the City's approach to managing stormwater runoff and minimizing the need for stormwater treatment. However, reducing maximum impervious cover can also reduce the amount of developable area that can be used on a site.	<ul style="list-style-type: none"> Impervious coverage requirements under BMC 12.14.030 are divided between requirements for overall coverage of hard surfaces, primary buildings, and accessory buildings. Permitted amounts of hard surface range from 35% (R 40,000) to 75% (R 2,800). Additional requirements for impervious surface coverage are included in the Critical Areas Ordinance (Chapter 14.04 BMC). Downtown coverage requirements allow 80–100% of lots to consist of hard surfaces. Ordinance 2415 adopted March 2024 allows building coverage to be increased by 10% and maximum hard surface coverage increased by 10% for duplex, triplex, and fourplex development under certain conditions. 	Limited options are available. Note that upzoning will likely occur under the Plan that will increase allowable impervious coverage in certain areas.
Lack of alignment between building codes and development codes	No. No substantial housing impacts are expected with respect to housing production and building codes, but there are some needs for change.	<ul style="list-style-type: none"> There is a need for more communication between building and development codes. Requirements for live-work units are not clear. See for example coverage of live-work units in BMC 20.02.050(A). Unit accessibility requirements need to be 	<ul style="list-style-type: none"> Develop clarifying regulations for management of live-work units in the building code. Create unit lot subdivision provisions in the development code. Provide a review of alignment between development and building codes.

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
		<p>clarified under the building code.</p> <ul style="list-style-type: none"> Unit lot subdivision requirements need to be included to address needs for fee simple ownership. 	
Other (for example: complex design standards, tree retention regulations, historic preservation requirements)	No. While there may be some limited impacts from other development regulations, no other major obstacles have been identified as a concern for production.	<ul style="list-style-type: none"> Tree preservation under Chapter 12.18 BMC provides some flexibility that can accommodate development needs on a site while maintaining tree cover. Regulation of historic resources in the Downtown through BMC 12.64.505 can be subject to challenges with timing and clarity of the regulations. The scope of these properties is limited, however, and related development projects often involve focused assistance from City staff. The provision of 200 square feet of recreation area per unit under BMC 12.20.020 may provide some limitations on site development. 	<ul style="list-style-type: none"> Revisit open space requirements for middle housing types to ensure that open space requirements do not constrain development.
PROCESS OBSTACLES			
Conditional use permit process	No. This is not applicable for most types of conditional use permits.	<ul style="list-style-type: none"> Not applicable for most moderate housing 	Not applicable.
Design review	No. This is not applicable for most types of development, excluding a limited number of	<ul style="list-style-type: none"> None except for downtown historic. 	Not applicable.

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
	historical downtown properties.		
Lack of clear and accessible information about process and fees¹	No. Permit tracking systems and information regarding fees are available to developers.	<ul style="list-style-type: none"> Ongoing improvements to permit tracking systems and available information on fees and charges have been made. 	No specific actions would be necessary, although ongoing review and updates to existing systems and information will be important over time.
Permit fees, impact fees and utility connection fees	No. These fees are not large enough to provide a substantial new obstacle and would present budgetary challenges if removed that could affect service provision.	<ul style="list-style-type: none"> School impact fees as per Chapter 21.12 BMC and transportation impact fees under Chapter 17.045 BMC are lower for multifamily housing units. Park impact fees under Chapter 21.08 BMC are scaled to unit size. Fire impact fees are provided on a per unit basis. Connection fees have some distinctions between single- and multi-family projects, but do not provide substantively lower fees for multifamily. There is the potential for streamlining and coordinating charges and fees. 	<ul style="list-style-type: none"> Streamline the different fee schedules to provide more certainty to developers. Confirm that accessory dwelling units have consistently lower fees charged. Provide clarity in the fee schedule about applications for multifamily projects. Provide alternative impact fees and other charges for middle housing versus classifying them as single-family or multifamily. Coordinate fees with other authorities and jurisdictions to ensure consistency.
Processing times and staffing challenges	No. While prompt delivery of completed permits is a key role of the city in current planning, permit processing does not appear to be a	<ul style="list-style-type: none"> The development market in the city is generally competitive with Eastside communities and permitting has been managed to keep 	No direct actions would be necessary at this time, but the City should monitor permit delivery times to identify any short-term issues and

¹ For example: guidance resources are unclear or difficult to find, no digital permit tracking system, staff do not provide fee estimates or permitting time estimates are unavailable or inaccurate.

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
	relative challenge as compared to other cities.	<p>in line with regional expectations.</p> <ul style="list-style-type: none"> Ongoing improvements have been made to permit systems to deliver decisions quickly. There have been some intermittent staffing issues due to a limited talent pool in planning across the state. 	proactively manage staff workloads to ensure that the effects of temporary short-staffing can be managed.
SEPA process	No. While the SEPA process could be reformed and streamlined, this is not suggested to be a major barrier to housing production.	<ul style="list-style-type: none"> Current exemption thresholds under Title 11 are low and potentially could be raised, but this would not impact a substantial number of projects. 	<ul style="list-style-type: none"> Increase SEPA thresholds to allow more housing projects to be exempted.
LIMITED LAND AVAILABILITY AND ENVIRONMENTAL CONSTRAINTS			
Lack of large parcels for infill development	Yes. As the city is largely built out, remaining areas are limited in size and often include other uses. This can make growth more challenging as infill and redevelopment projects are limited to more challenging sites.	<ul style="list-style-type: none"> Overall, the community is built out with a minimal amount of area available for typical subdivisions. Significant physical constraints on development reduce the amount of land area that can accommodate new growth. Note that some properties with existing uses are available for infill and development projects. Note the former Seattle Times North Creek printing plant being replaced with a mixed-use project. 	<ul style="list-style-type: none"> Coordination of policies for any remaining government surplus lands, including the city, school district, state and federal agencies, and other jurisdictions. Changes in zoning to allow for more density and provide opportunities for strategic infill and redevelopment projects.
Environmental constraints	Yes. The city has significant wetlands, floodplains, and steep slopes that affect the	<ul style="list-style-type: none"> Existing maps of critical areas and geological hazards highlight how the city has a considerable 	No action is necessary per se, but the city should ensure that other development regulations

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
	availability of developable lands.	amount of land where development is limited. (Note that this has been incorporated into buildable lands analyses.)	support achievement of growth targets.

Exhibit B-63. Low-Rise or Mid-Rise Housing Barrier Review Checklist

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
DEVELOPMENT REGULATIONS			
Unclear development regulations	No. While there are ongoing concerns about maintaining clear language in development regulations, there are no immediate concerns.	<p>There are some major elements in development regulations that have been suggested as confusing in the regulations:</p> <ul style="list-style-type: none"> ○ Certain zones that allow for multifamily housing still permit single-family housing. ○ Subareas plans, especially in the Downtown, consist of hybrid codes that also include form-based regulations. ○ There is some confusion about the development and use of live-work units, especially with respect to home occupation regulations. ○ Regulation of multifamily housing can be different between different subareas. 	<ul style="list-style-type: none"> ○ A common set of development regulations will be provided under the new Comprehensive Plan to provide consistency between subareas where low- to mid-rise housing is allowed. ○ Clarity for live-work designations should be provided.
High minimum lot sizes	No. Minimum lot sizes are typically defined according to individual subareas and areas which currently allow low- to mid-rise development have no minimum lot sizes.	<ul style="list-style-type: none"> ○ No minimum lot sizes are provided for areas where low- and mid-rise development is allowed. 	No action is necessary at present. However, if mid-rise development is allowed in these areas, minimum lot sizes should be re-examined

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
			to ensure there are no barriers.
Low maximum densities or low maximum FAR	No. Current densities and FAR would not appear to provide barriers to housing per se, but they can	<ul style="list-style-type: none"> ○ Downtown development is managed largely by form-based codes. ○ Canyon Park development is managed through FAR, which is largely sufficient to meet multifamily development needs under current market conditions. ○ Other subareas provide density requirements and are not regulated by FAR. While these areas may be low, they are not an issue unto themselves. 	<ul style="list-style-type: none"> ○ Maximum density/FAR requirements will be increased under expected changes to land use designations in the Comprehensive Plan.
Low maximum building heights	No. Building heights do not appear to be a strong limitation per se, but increases in housing capacity may require increases in building heights and flexibility with associated parking requirements.	<ul style="list-style-type: none"> ○ Some subareas have additional allowances for increased heights for R 2,800 and R-AC zoning. ○ Additional heights may be allowed in the Canyon Park Subarea based on providing a certain percentage of parking within the structure. See BMC 12.46.020(A)(1)(a). 	<ul style="list-style-type: none"> ○ Allow some flexibility with respect to achieving additional height without the need for parking within the structure, which may increase costs.
Large setback requirements	Yes. While base setback requirements may not be an issue, multifamily housing is often subject to setbacks when it abuts lower-density neighborhoods.	<ul style="list-style-type: none"> ○ Several code sections for R-AC and downtown zones indicate that buildings of certain heights will require additional setback from residential areas defined under R zoning. See for example BMC 12.46.020(A)(2). 	<ul style="list-style-type: none"> ○ Review setback requirements from R zoning to determine if these may be reduced, especially in areas where transitional residential development heights may be located.
High off-street parking requirements	Yes. While there are targeted reductions in the Downtown subarea and close to transit stations, overall parking	<ul style="list-style-type: none"> ○ Citywide, requirements under BMC 12.16.030(A) require three spaces per single-family 	<ul style="list-style-type: none"> ○ Citywide parking regulations should be examined to streamline these requirements and

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
	requirements are high. This can increase the cost of housing development and reduce the effective yields.	<p>housing unit, and at least 2.2 for multifamily units.</p> <ul style="list-style-type: none"> Reduced parking requirements for transit proximity, low-income units, senior housing, etc. are provided under BMC 12.16.110. For Downtown, residential parking requirements are 0.75–1 space per bedroom to a maximum of 2.2 per unit. Certain neighborhoods may have no on-street parking provided at certain widths, which may complicate reductions in on-site parking. 	reduce parking requirements citywide (outside the downtown or where other reductions would not apply).
High impervious coverage limits	No. Impervious coverage limits are high in areas where multifamily housing is expected.	<ul style="list-style-type: none"> Downtown coverage requirements allow 80–100% of lots to consist of hard surfaces. Additional requirements for impervious surface coverage are included in the Critical Areas Ordinance (Chapter 14.04 BMC). 	No action is necessary.
Lack of alignment between building and development codes	No. No substantial housing impacts are expected with respect to housing production and building codes, but there are some needs for change.	<ul style="list-style-type: none"> There is a need for more communication between building and development codes. Requirements for live-work units are not clear. See for example coverage of live-work units in BMC 20.02.050(A). Unit accessibility requirements need to be clarified under the building code. Overall review of alignment between building and development codes needs to be conducted. 	<ul style="list-style-type: none"> Develop clarifying regulations for management of live-work units in the building code. Provide a review of alignment between development and building codes.

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
<p>Other (for example: ground floor retail requirements, open space requirements, complex design standards, tree retention regulations, historic preservation requirements)</p>	<p>No. There are no significant requirements that appear to be major obstacles, although there are possibilities to streamline and address minor elements of relevant code.</p>	<ul style="list-style-type: none"> ○ Downtown historic district requirements under BMC 12.64.505 are targeted to a limited number of sites in the Downtown Special Review Area that have historical buildings and properties in need of preservation. ○ At-grade mixed-use requirements are targeted in certain subareas such as Downtown and Canyon Park. See for example BMC 12.46.020(A)(1)(b). ○ Open space requirements are maintained on a district-by-district basis in the Downtown. ○ Tree preservation under Chapter 12.18 BMC provides some flexibility that can accommodate development needs on a site while maintaining tree cover. 	<ul style="list-style-type: none"> ○ Provide more consistency between subareas as to requirements for open space and mixed-use requirements. ○ Allow ground-floor live-work units to fulfill requirements for at-grade retail and service uses.
<p>PROCESS OBSTACLES</p>			
<p>Conditional use permit process</p>	<p>No. This is not applicable for most types of conditional use permits.</p>	<ul style="list-style-type: none"> ○ Not applicable for most residential development under R-AC zoning. 	<p>Not applicable.</p>
<p>Design review</p>	<p>No. This is not applicable for most types of development, excluding a limited number of historical downtown properties.</p>	<ul style="list-style-type: none"> ○ Downtown historic district requirements under BMC 12.64.505 are targeted to a limited number of sites that have historical buildings and properties in need of preservation. The limited scope of this requirement suggests that impacts to housing production will be minimal. 	<p>Not applicable.</p>

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
Lack of clear and accessible information about process and fees	No. Permit tracking systems and information regarding fees are available to developers.	<ul style="list-style-type: none"> Ongoing improvements to permit tracking systems and available information on fees and charges have been made. 	No specific actions would be necessary, although ongoing review and updates to existing systems and information will be important over time.
Permit fees, impact fees and utility connection fees	No. These fees are not large enough to provide a substantial new obstacle and would present budgetary challenges if removed that could affect service provision.	<ul style="list-style-type: none"> School impact fees as per Chapter 21.12 BMC and transportation impact fees under Chapter 17.045 BMC are lower for multifamily housing units. Park impact fees under Chapter 21.08 BMC are scaled to unit size. Fire impact fees are provided on a per unit basis. Connection fees have some distinctions between single- and multi-family projects, but do not provide substantively lower fees for multifamily. There is the potential for streamlining and coordinating charges and fees. 	<ul style="list-style-type: none"> Streamline the different fee schedules to provide more certainty to developers. Additional changes may be challenging given potential fiscal impacts, but expansions of impact fees should consider potential development feasibility effects.
Process times and staffing challenges	No. While prompt delivery of completed permits is a key role of the city in current planning, permit processing does not appear to be a relative challenge as compared to other cities.	<ul style="list-style-type: none"> The development market in the city is generally competitive with Eastside communities and permitting has been managed to keep in line with regional expectations. Ongoing improvements have been made to permit systems to deliver decisions quickly. There have been some staffing challenges with hiring building examiners. 	No direct actions would be necessary at this time, but the City should monitor permit delivery times to identify any short-term issues and proactively manage staff workloads to ensure that the effects of temporary short staffing can be managed.

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
SEPA process	No. While the SEPA process could be reformed and streamlined, this is not suggested to be a major barrier to housing production.	<ul style="list-style-type: none"> Planned action ordinances are in place for the Downtown and Canyon Park subareas. 	<ul style="list-style-type: none"> Additional development of planned action ordinances for new centers (e.g., the Red Barn/Lake Pleasant neighborhood) would streamline the SEPA process for more centers in the city.
LIMITED LAND AVAILABILITY AND ENVIRONMENTAL CONSTRAINTS			
Lack of large parcels for infill development	Yes. As the city is largely built out, remaining areas are limited in size and often include other uses. This can make growth more challenging as infill and redevelopment projects are limited to more challenging sites.	<ul style="list-style-type: none"> Overall, the community is built out with a minimal amount of area available for typical subdivisions. Significant physical constraints on development reduce the amount of land area that can accommodate new growth. Note that some properties with existing uses are available for infill and development projects. Note the former Seattle Times North Creek printing plant being replaced with a mixed-use project. 	<ul style="list-style-type: none"> Coordination of policies for any remaining government surplus lands, including the city, school district, state and federal agencies, and other jurisdictions. Changes in zoning to allow for more density and provide opportunities for strategic infill and redevelopment projects.
Environmental constraints	Yes. The city has significant wetlands, floodplains, and steep slopes that affect the availability of developable lands.	<ul style="list-style-type: none"> Existing maps of critical areas and geological hazards highlight how the city has a considerable amount of land where development is limited. (Note that this has been incorporated into buildable lands analyses.) 	No action is necessary per se, but the city should ensure that other development regulations support achievement of growth targets.

Exhibit B-64. Supplementary Barrier Review Checklist for PSH and Emergency Housing

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barriers.
DEVELOPMENT REGULATIONS			
Spacing requirements (for example, minimum distance from parks, schools or other emergency/PSH housing facilities)²	Yes. There are no exemptions specified for religious organizations as described under the statute for notification requirements related to schools and child care facilities.	<ul style="list-style-type: none"> As per BMC 12.06.160(B)(3)(a)(4), there are requirements for notification and mitigation planning with respect to distances from schools and child care facilities. Requirements under RCW 35A.21.360(2) cannot impose conditions on religious organizations that would otherwise be required for health and safety. RCW 35A.21.360(3) provides provisions for memoranda of understanding with the City, but BMC 12.06.160(B)(3)(a)(4)(C) specifies that a mitigation plan would require negotiation with other facilities, not with the City, and evaluation of those discussions. 	<ul style="list-style-type: none"> Review and confirm that requirements for mitigation under BMC 12.06.160(B)(3)(a)(4) do not unduly burden religious organizations and siting of shelter uses. Remove requirements for separate negotiations for mitigation planning and provide for a City-approved MOU.
Parking requirements	No. However, the provisions of temporary uses do not include	<ul style="list-style-type: none"> Requirements under RCW 35A.21.360 include provisions for "vehicle resident safe parking", which is not 	<ul style="list-style-type: none"> Provide additional language in BMC 12.06.160(B)(3) to explicitly define the requirements

² Note that RCW 35A.21.430 expressly states requirements on occupancy, spacing, and intensity of use may not prevent the siting of a sufficient number of permanent supportive housing, transitional housing, indoor emergency housing or indoor emergency shelters necessary to accommodate each code city's projected need for such housing and shelter under RCW 36.70A.070(2)(a)(ii). The restrictions on these uses must be to protect public health and safety.

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barriers.
	provisions for safe parking for vehicle residents.	acknowledged in the code and not considered under the definition of "transitory accommodations" under BMC 12.06.160(B)(3) .	"vehicle resident safe parking" consistent with this section.
On-site recreation and open space requirements	No.	<ul style="list-style-type: none"> There are no specific requirements for open space beyond what is generally required, such as requirements under Chapter 12.20 BMC and individual subareas. Transitory accommodations do not have on-site recreation and open space requirements under BMC 12.06.160(B)(3). 	No action needed.
Restrictions on support spaces, such as office space, within a transitional or PSH building in a residential zone	No. Accessory office uses for facilities are not explicitly permitted as a primary use in residential areas, although they could be allowed as a "home occupation" under BMC 12.06.140(B)(8) . However, note that nursing homes and residential care facilities currently allowed in these areas have been subject to the same restrictions.	<ul style="list-style-type: none"> Home occupations under BMC 12.06.140(B)(8) limit the number of workers and require at least one resident to work in the space. Office uses are not specifically allowed in R districts outside of R-AC zones under BMC 12.06.050. 	<ul style="list-style-type: none"> Adjust the code to clarify that office and support uses accessory to permanent supportive housing may be allowed.
Arbitrary limits on number of occupants (in conflict with RCW 35A.21.314)	Yes. There are specific requirements regarding occupancy that will need to be addressed for compliance.	<ul style="list-style-type: none"> BMC 12.06.140(B)(9) specifically indicates that households of more than six persons are not allowed as permanent residential uses unless excepted as specified. 	<ul style="list-style-type: none"> Rewrite this requirement to remove household size limitations and specify that occupancy is only limited according to building and fire code regulations.

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barriers.
<p>Requirements for PSH or emergency housing that are different than the requirements imposed on housing developments generally (in conflict with RCW 36.130.020)</p>	<p>No. Primary limitations on household sizes limit the provision of permanent supportive housing and comparable uses, but no other requirements exist separately per se. However, requirements will need to be considered in revisions.</p>	<ul style="list-style-type: none"> ○ Current provisions for domestic violence shelters as per BMC 12.06.140(B)(9)(a) rely on the discretion of the director to determine whether there will be impacts on the community due to parking, etc. ○ Additional requirements in this section mandate that the director be allowed to make a determination if a larger household can be accommodated only in relation to compliance with the Federal Fair Housing Act as per BMC 12.06.140(B)(9)(b). 	<ul style="list-style-type: none"> ○ Ensure that revisions to the code do not include discretionary requirements or conditions beyond what would otherwise be accommodated in these zones.
<p>Other restrictions specific to emergency shelters, emergency housing, transitional housing and permanent supportive housing</p>	<p>No. No other major barriers are present, although the City may provide for streamlining of requirements and permitting.</p>	<p>None.</p>	<ul style="list-style-type: none"> ○ Review permitting processes for transitory accommodations to ensure that the process is efficient and provides no undue burden on religious organizations.

Exhibit B-65. Accessory Dwelling Unit Barrier Review Checklist

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barriers.
DEVELOPMENT REGULATIONS			
<p>Consistent with HB 1337 (2023)</p> <ul style="list-style-type: none"> Must allow two ADUs on each lot in urban growth areas; May not require the owner to occupy the property, and may not prohibit sale as independent units, but may restrict the use of ADUs as short term rentals; Must allow an ADU of at least 1,000 square feet; Must set parking requirements based on distance from transit and lot size; May not charge more than 50% of the impact fees charged for the principal unit; Must permit ADUs in structures detached from the principal unit; May not restrict roof heights of ADUs to less than 24 feet, unless that limitation applies to the principal unit; May not impose setback requirements, yard coverage limits, tree retention mandates, restrictions on entry door locations, aesthetic requirements, or requirements for design review for ADUs that are more restrictive than those for principal units; Must allow an ADUs on any lot that meets the minimum lot size required for the principal unit; Must allow detached ADUs to be sited at a lot line if the lot line abuts a public alley, unless the city or county routinely plows snow on the public alley; Must allow conversions from existing structures, even if they violate current code requirements for setbacks or lot coverage; and May not require public street improvements as a condition of permitting ADUs. 	No. Current requirements under the BMC were revised by Ordinance 2415 in March 2024 to fulfill these requirements.	<ul style="list-style-type: none"> BMC 12.14.135 lists development regulations for ADUs, and inconsistencies between the existing code and requirements under HB 1337 were addressed by Ordinance 2415. 	<ul style="list-style-type: none"> No action is necessary to address barriers, but additional revisions could be made to help increase production of ADUs, such as increased allowed building heights for ADUs or clear identification of impact fee limits.
Unclear development regulations	No. While current development regulations need to be reviewed for compliance, development regulations are clear.	Bothell Municipal Code provides clear directions on ADUs. Revisions as noted above should be reviewed to maintain clarity in requirements.	<ul style="list-style-type: none"> Regulations will be updated to both ensure consistency with HB 1337 and maintain clarity on requirements and regulations.
Large setback requirements	Yes. There are no specific setback requirements for ADUs, but some	<ul style="list-style-type: none"> General setback requirements in 	<ul style="list-style-type: none"> Setbacks from alleys under BMC

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barriers.
	requirements may need to be reviewed.	<p>development regulations are applicable, but no large setbacks are provided that would significantly restrict ADUs under BMC 12.14.135.</p> <ul style="list-style-type: none"> ○ A five-foot setback from alleys is required under BMC 12.14.060. ○ Note that offspring lots identified under BMC 12.14.085 may be applicable if ADUs are divided for separate ownership. 	12.14.060 will need to be changed to allow ADUs to be sited along the lot line, unless these public alleys are plowed by the city.
Off-street parking requirements	No. Provisions are provided for off-street parking for sites that are close to transit or major activity centers and amenities.	<ul style="list-style-type: none"> ○ BMC 12.14.135(B)(4) requires an additional off street parking spot for ADUs. Ordinance 2415 adopted March 2024 eliminated parking requirements for ADUs near transit or a regional trail that provides continuous pave connections to activity center and amenities. 	<ul style="list-style-type: none"> ○ No action is necessary.
Other (for example: burdensome design standards, tree retention regulations, historic preservation requirements, open space requirements, etc.)	No. Current requirements under the BMC were revised by Ordinance 2415 in March 2024 to remove barriers.	<ul style="list-style-type: none"> ○ Ordinance 2415 adopted March 2024 removed requirements in BMC 12.14.135 for ADUs to be occupied by the property owner or a family member and specific design considerations for entrances to maintain single-family character and screening to consider the privacy of adjacent residential uses. 	<ul style="list-style-type: none"> ○ No action is necessary.

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barriers.
PROCESS OBSTACLES			
Lack of clear and accessible information about process and fees	No. There are clear sources of information available about the process and applicable fees.	<ul style="list-style-type: none"> BMC 12.14.135(B)(8) and (9) provide for permitting requirements for structures for the City and recording documents in King and Snohomish counties. 	While additional information and guidance can be useful for property owners interested in ADUs, no action would be needed specifically to address concerns.
Permit fees, impact fees and utility connection fees that are not proportionate to impact	Yes. While some impact fees are managed differently for ADUs, other fees do not explicitly consider them as separate housing types.	<ul style="list-style-type: none"> There are park reduction fees that proportionate to dwelling unit size and transportation impact fees include a separate line for ADUs. It is unclear whether school impact fees or other permit and utility connection fees are commensurate with impacts. 	<ul style="list-style-type: none"> All fees should be reviewed and updated to include separate provisions for ADUs.
Processing times and staffing challenges	No. Processing times and staffing do not currently provide consistent obstacles for the provision of ADUs. Note, however, to date the provision of ADUs in the city has been significantly lower than other types of housing.	<ul style="list-style-type: none"> No significant differences exist between general processing/staffing challenges and those for ADUs 	No direct action is necessary, but provisions for changes should encourage streamlining of requirements, such as provisions for pre-approved plans, that can reduce processing times and staff resource demands.

Exhibit B-66. Checklist for Local Option Tools for Addressing Affordable Housing Funding Gaps

Local tool options for addressing affordable housing funding gaps	Implementation status	Plans for implementation
Housing and related services sales tax (RCW 82.14.530)	Not currently applied.	No immediate plans to create this program.
Affordable housing property tax levy (RCW 84.52.105)	Not currently applied.	No immediate plans to create this program.
REET 2 (RCW 82.46.035) – GMA jurisdictions only and only available through 2025	This is included under Chapter 3.30 BMC, but currently only includes consideration of capital improvements with no separate provisions for funding affordable housing projects as per RCW 82.46.035 (5).	No immediate plans to change this program.
Affordable Housing Sales Tax Credit (RCW 82.14.540) – was only available to jurisdictions through July 2020	Bothell has adopted an Affordable Sales Tax Credit under Chapter 3.23 BMC.	Complete.
Lodging Tax (RCW 67.28.150 and RCW 67.28.160) to repay general obligation bonds or revenue bonds	Bothell has an excise tax for lodging (under Chapter 3.25 BMC, but funds collected are directed to a special fund to promote tourism and related activities.	No immediate plans to change this program.
Mental Illness and Drug Dependency Tax (RCW 82.14.460) – jurisdictions with a population over 30,000	Not currently applied.	No immediate plans to create this program.
Donating surplus public lands for affordable housing projects (RCW 39.33.015)	<p>There are provisions for the sale of public lands, and BMC 2.94.060 notes that property can be transferred in accordance with Chapter 39.33 RCW.</p> <p>Note that the city currently does not have a policy regarding the disposition of surplus lands for affordable housing, but property sales such as for downtown Lot A have supported affordable housing goals.</p>	<ul style="list-style-type: none"> Amend BMC 2.94.010 to specifically include affordable housing as an alternative justification to "reasonable return".

Local tool options for addressing affordable housing funding gaps	Implementation status	Plans for implementation
Impact fee waivers for affordable housing projects (RCW 82.02.060)	There no provisions for impact fee waivers for affordable housing currently in the Code.	<ul style="list-style-type: none"> Explore specific fee waivers for affordable housing.
Application fee waivers or other benefits for affordable housing projects (RCW 36.70A.540)	Not currently applied.	<ul style="list-style-type: none"> Explore specific fee waivers for affordable housing.
Multifamily Tax Exemption (MFTE) with affordable housing requirement (RCW 84.14)	The City utilizes the MFTE program for all multifamily zoning districts (Chapter 3.90 BMC)	<ul style="list-style-type: none"> Review and revise MFTE programs to balance incentives with the provisions of affordable housing. Explore the use of MFTE in tandem with other affordable housing requirements to incentivize permanently affordable housing units.
General funds (including levy lid lifts to increase funds available)	No affordable housing projects are currently included in the Capital Facilities Plan that would be funded by the General Fund, and no other major programs draw upon the General Fund.	None at present, although this will be dependent on funding needs for current and future programs.



B.5 ADEQUATE PROVISIONS

In addition to providing sufficient land capacity to meet housing growth targets, current GMA guidance also requires jurisdictions to make “adequate provisions.” Cities must do what is within their power to encourage the kinds of development that will meet housing growth targets at all income levels. Per [RCW 36.70A.070\(2\)\(d\)](#), adequate provisions include:

- (i) Incorporating consideration for low, very low, extremely low, and moderate-income households;*
- (ii) Documenting programs and actions needed to achieve housing availability including gaps in local funding, barriers such as development regulations, and other limitations;*
- (iii) Consideration of housing locations in relation to employment location; and*
- (iv) Consideration of the role of accessory dwelling units (ADUs) in meeting housing needs.*

Analysis to identify adequate provisions must be done as part of the Comprehensive Plan update. Actions taken to “make adequate provisions,” however, may be taken after the Comprehensive Plan is adopted. Either way, Bothell must provide the Washington State Department of Commerce (Commerce) with a report detailing progress in implementing the Comprehensive plan five years after its adoption, in 2029. Requirements for the implementation report are outlined in [RCW 36.70A.130](#), including status updates on housing element implementation and permitting timelines.

This section summarizes the analysis of the adequate provisions conducted by the City and consultant team. Actions to be completed by the Comprehensive Plan deadline per the capacity analysis in [Section B.3 Gap Analysis](#) are also summarized.

Consideration for All Income Levels

GMA requires Bothell to plan for and accommodate housing needs at all income levels. These needs are defined in housing growth targets by income level that were provided by Snohomish County and King County and documented in Countywide Planning Policies. These targets are presented above in [Section B.3 Gap Analysis, Bothell’s GMA Growth Targets](#). In its Comprehensive Plan, Bothell must show it has adequate land capacity to accommodate housing appropriate for meeting needs at each affordability level. Bothell must also identify barriers to producing housing at each affordability level and identify adequate provisions to address those barriers in the Comprehensive Plan.

Actions Needed to Achieve Housing Availability & Affordability

[Exhibit B-67](#) lists recommended actions the City can take to overcome barriers to housing production and improve the likelihood that future development will meet the housing needs of all income levels over the next 20 years. This is a long list that would likely take multiple years to implement. The following two sections identify the short lists of actions that must be completed before the Comprehensive Plan deadline and those that should be highest priority for implementation following the adoption of the Comprehensive Plan.


Exhibit B-67. Barriers to Housing Production and Proposed Actions to Address

Barrier	Housing Types Impacted	Proposed Actions
High minimum lot sizes	<ul style="list-style-type: none"> Duplex 3-6 plex Townhomes 	<ul style="list-style-type: none"> Decrease minimum lot sizes from 7,200 ft² to 5,000 ft² in the R/L areas and from 4,000 ft² to 2,000 ft² in the R/M areas.
Low max density	<ul style="list-style-type: none"> Duplex 3-6 plex Townhomes 	<ul style="list-style-type: none"> Increase maximum densities from 2 to 4 units per lot in the R/L areas and 8 units per lot in the R/M areas. Rezone targeted areas where additional services are available or anticipated (primarily in central Bothell, west of Downtown, and west of Red Barn) from zones in the R/L land use designation to zones in the R/M designation. Increase maximum heights and target FARs in the Downtown (D/C, D/G, D/N, and D/T), commercial (C/G), employment (E/L and E/M), and mixed-use areas (MU/C, MU/E, and MU/N).
Low maximum building heights	<ul style="list-style-type: none"> Low-rise Mid-rise 	<ul style="list-style-type: none"> Increase maximum heights and target FARs in the Downtown (D/C, D/G, D/N, and D/T), commercial (C/G), employment (E/L and E/M), and mixed-use areas (MU/C, MU/E, and MU/N).
Large setback requirements	<ul style="list-style-type: none"> Duplex 3-6 plex Townhomes Low-rise Mid-rise 	<ul style="list-style-type: none"> Review setbacks for residential zones to determine if a reduction of setbacks would address limitations on site development, especially in areas where transitional residential development heights may be located. <i>[NOTE: Ordinance 2415 adopted March 2024 reduced front and rear minimum setbacks to 5 feet for duplex, triplex, and fourplex development under certain conditions.]</i>
High off-street parking requirements	<ul style="list-style-type: none"> Duplex 3-6 plex Townhomes Low-rise Mid-rise 	<ul style="list-style-type: none"> Reduce parking requirements citywide, outside of downtown or where other reductions would not apply.
Lack of large parcels for infill development	<ul style="list-style-type: none"> 3-6 plex Townhomes Low-rise Mid-rise 	<ul style="list-style-type: none"> Coordination of policies for any remaining government surplus lands, including the city, school district, state and federal agencies, and other jurisdictions. Changes in zoning to allow for more density and provide opportunities for strategic infill and redevelopment projects.
Spacing requirements	<ul style="list-style-type: none"> Emergency housing 	<ul style="list-style-type: none"> Review and confirm that requirements for mitigation under BMC 12.06.160(B)(3)(a)(4) do not unduly burden religious organizations and siting of shelter uses. Remove requirements for separate negotiations for mitigation planning and provide for a City-approved MOU.
Restrictions on support spaces, such as office space, within a transitional	<ul style="list-style-type: none"> Permanent supportive housing 	<ul style="list-style-type: none"> Adjust the code to specifically allow office uses accessory to the primary residential use for permanent supportive housing.



Barrier	Housing Types Impacted	Proposed Actions
or PSH building in a residential zone		
Arbitrary limits on number of occupants	<ul style="list-style-type: none"> Permanent supportive housing 	<ul style="list-style-type: none"> Rewrite this requirement to remove household size limitations and specify that occupancy is only limited according to building and fire code regulations.
Permit fees, impact fees and utility connection fees that are not proportionate to impact	<ul style="list-style-type: none"> Accessory dwelling units 	<ul style="list-style-type: none"> All impact fees should be updated to have separate provisions for ADUs that are not more than 50% of fee charged for principal unit.
Affordable housing funding gaps	<ul style="list-style-type: none"> Income-restricted affordable housing 	<ul style="list-style-type: none"> Amend BMC 2.94.010 to specifically include affordable housing as an alternative justification to "reasonable return" for the sale of public land. Provide impact fee waivers for affordable housing projects. Review and revise MFTE programs to balance incentives with the provisions of affordable housing. Explore the use of MFTE in tandem with other affordable housing requirements to incentivize permanently affordable housing units.

Source: City of Bothell, 2024; BERK, 2024.

Actions to be Completed by Comprehensive Plan Deadline

While actions to make adequate provisions do not need to be implemented as part of the Comprehensive Plan update, actions required to demonstrate capacity to meet all housing needs are required to be completed by the Comprehensive Plan deadline. Per the capacity analysis in [Section B.3](#), there is a deficiency of total housing capacity in the Snohomish portion of Bothell under current zoning. The greatest capacity deficit is for housing to serve households with 0-80% AMI, although there is also a capacity deficit for >120% AMI households (see [Exhibit B-60](#)). Capacity deficits in the Snohomish County portion of Bothell are also likely to contribute to a lack of affordable housing options and increased housing costs citywide, even though the King County portion shows adequate capacity under current zoning for all income bands.

Actions to be completed by the Comprehensive Plan deadline include zoning code updates that allow for additional density, and therefore capacity, for key housing types needed to accommodate growth targets—two growth alternatives are currently under consideration that would require different code revisions (Alternative 2 Neighborhoods and Alternative 3 Centers). Both alternatives assume the City adopts new future land use designations which would be implemented by the corresponding zones listed in [Exhibit B-53](#). The final action to be completed concerns code updates to remove barriers that limit capacity for permanent supportive housing and emergency housing.

- Rezone certain areas where additional services are available or anticipated (primarily in central Bothell, west of Downtown, and west of Red Barn) from zones in the R/L land use designation to zones in the R/M designation.



- Alternative 2 Neighborhoods: allow more housing types and increase density throughout the residential areas. Code amendments would include:
 - Allow smaller-scale multifamily and middle housing options in the R/M areas.
 - Decrease minimum lot sizes from 7,200 ft² to 5,000 ft² in the R/L areas and from 4,000 ft² to 2,000 ft² in the R/M areas.
 - Increase maximum densities from 2 to 4 units per lot in the R/L areas and to 8 units per lot in the R/M areas.
 - Increase maximum heights and target FARs in the existing mixed-use areas from 3 to 4 stories and from 2.5 to 2.5-3 FAR.
- Alternative 3 Centers: focus additional capacity via increased heights and FARs in the city's existing mixed-use areas—primarily Downtown, Canyon Park, North Creek, and Red Barn—with an increased reliance on multi-unit housing. Code amendments would include:
 - Increase maximum densities from 2 to 4 units per lot in the R/L and R/M areas.
 - Increase maximum heights and target FARs in the Downtown (D/C, D/G, D/N, and D/T), commercial (C/G), employment (E/L and E/M), and mixed-use areas (MU/C, MU/E, and MU/N).
- Update the City's development standards for emergency and permanent supportive housing. The standards should be updated to regulate emergency and supportive housing more similar to other housing uses. Occupancy, spacing, and intensity of use requirements should be consistent with guidance from the Department of Commerce.

Highest Priority Actions For Implementation After the Comprehensive Plan Deadline

Exhibit B-67 includes the complete list of recommended actions to make adequate provisions. The following actions are identified as top priority for the City to implement following adoption of the Comprehensive Plan. These actions are either required to comply with recent changes in state law or they have potential for greatest impact on addressing the City's most pressing need, affordable housing. Depending upon the alternative selected, some of these actions may be completed before the Comprehensive Plan deadline (see previous section).

- Reduce parking requirements citywide, outside of downtown or where other reductions would not apply.
- Review and confirm that requirements for emergency housing mitigation under [BMC 12.06.160\(B\)\(3\)\(a\)\(4\)](#) do not unduly burden religious organizations and siting of shelter uses.
- Remove requirements for separate negotiations for emergency housing mitigation planning and provide for a City-approved MOU.

Location of Housing & Employment

The third adequate provision required by [RCW 36.70A.070\(d\)](#) is the consideration of housing locations in relation to employment location. Commerce recommends jurisdictions analyze these issues and document their findings. Bothell did this work in 2023 and 2024 as part of updating the Economic Development Element and the Housing Element. See the **Workforce Profile** above in **Section B.1 Inventory**. Some key findings include:



- **Jobs/Housing Balance.** As of 2023, Bothell had a jobs-to-population ratio of 0.66, above the average for both King and Snohomish counties and generally comparable with the City of Lynnwood. Bothell's jobs-to-population ratio has remained relatively steady since 2000 with a notable decrease in 2014 due to a major annexation). See [Exhibit B-23](#). As of 2022, the jobs to housing ratio in Bothell was 1.57 (32,421 jobs divided by 20,585 units in city limits), slightly higher than the balanced range of 0.75 – 1.5.
- **Commute Patterns.** Nearly all working residents commute to jobs outside of the city despite local job opportunities. More individuals commute to Bothell for work than leave to work in another location (28,778 compared with 19,813 individuals, respectively) and about 2,000 individuals both live and work in the city. Geographically, employment in Bothell is concentrated in the Downtown, North Creek, and Canyon Park neighborhoods. See [Exhibit B-25](#) and [Exhibit B-26](#).
- **Land Use Patterns.** The City's current land use pattern is suburban with mixed use and employment areas concentrated in the Downtown, North Creek, and Canyon Park neighborhoods (see [Exhibit B-24](#)). Downtown is the most urban and pedestrian friendly area of the city consistent with the Downtown Subarea Plan.

These findings were considered in the development of Bothell's preferred growth alternative. **[Elaborate pending Preferred Alternative].**

Role of ADUs

The fourth adequate provision required by [RCW 36.70A.070\(d\)](#) is to consider the role of ADUs in meeting housing needs. Given that a large proportion of land in Bothell is devoted to detached single family homes, there is potential to support housing needs by allowing and encouraging the production of attached and/or detached dwelling units on lots with single family homes. These types of housing have potential to be affordable to moderate and lower-income households.

In 2023, HB 1110 and HB 1337 directed all jurisdictions to make significant changes to ADU regulations, including allowing two ADUs per lot in all GMA urban growth areas, and reducing barriers to ADU development related to occupancy, sale, lot size, and parking. Bothell plans to update its code to comply with these provisions. Ordinance 2415 adopted March 2024 addressed inconsistencies between requirements under HB 1337 and existing code for ADUs (including revisions to [BMC 12.14.135](#) which lists development regulations for ADUs and removing parking requirements in [BMC 12.16.110](#) for ADUs near transit). The City was required to complete the code updates within six months of the periodic update deadline.

It is difficult to predict what ADU production trends will be after code updates are made for compliance with HB 1110 and HB 1337. In recent years there has not been significant ADU development activity, but there is the potential for a significant increase in the future given planned code updates and the existing sizes of residential lots and homes. This is reflected in the housing land capacity analysis and considerations for whether the City can accommodate housing targets under current zoning.



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