

# Appendix D:

## Land Capacity Analysis

*Revised September 27, 2024*

### Introduction

The Growth Management Act (GMA) requires comprehensive plans to include a housing element that identifies “sufficient capacity of land” to accommodate all projected housing needs during the twenty-year planning horizon (RCW 36.70A.070(2)(c)). Under the GMA, local governments must conduct a Land Capacity Analysis (LCA) to measure and document capacity for new housing development on vacant, partially used, or under-developed lands. This analysis considers the potential for land within a community's boundaries to accommodate new housing growth, given what is allowed under current (or planned) zoning and development regulations and what can reasonably be anticipated based on past development and factors that may cause trends to change in the future. House Bill 1220 (HB 1220) updated the GMA to require cities to “plan for and accommodate” housing for all income levels.<sup>1</sup> The Washington State Department of Commerce (Commerce) provides guidance for local governments to update their comprehensive plan housing elements. Specifically, HB 1220 Book 2 Guidance for Updating Your Housing Element provides detailed methods for how local governments can conduct an LCA for all income levels, including emergency housing and shelters.<sup>2</sup> The methods for the Kent LCA closely follow the Commerce guidance.

This LCA describes the amount and types of land available for residential uses in the City of Kent. It is conducted in several steps, as follows:

1. Update 2021 King County Urban Growth Report to account for recent development.
2. Apply assumptions for density, housing types, and income categories consistent with the City's existing zoning designations, and report results by capacity for various housing types, density levels, and income categories.
3. Analyze and report capacity for the three land use alternatives and Preferred Alternative prepared as part of the Comprehensive Plan effort. These are described briefly in this memorandum and in greater detail in the Comprehensive Plan Update's Draft Environmental Impact Statements.

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<sup>1</sup> House Bill 1220. <https://lawfilesexternal.wa.gov/biennium/2021-22/Pdf/Bills/Session%20Laws/House/1220-S2.SL.pdf?q=20211209114015>

<sup>2</sup> HB 1220 Book 2 Housing Element Update. <https://deptofcommerce.app.box.com/s/1d9d517g509r389f0mjpowh8isjpirlh>

# 1. Growth Targets and the 2021 King County Urban Growth Report

The 2021 Urban Growth Capacity Report is King County’s periodic assessment of development capacity for future housing and employment.

The report is a culmination of the county’s Review and Evaluation Program, commonly referred to as “Buildable Lands,” as required by the Growth Management Act in RCW 36.70A.215, and it is King County’s fourth buildable lands report. It is a collaborative production of the 40 jurisdictions across King County that analyzes the form, quantity, and density of residential and non-residential development observed between 2012 and 2018. It identifies growth targets for the City of Kent, as follows.

*Table 1. City of Kent Residential Growth Targets*

<b>Jurisdiction</b>	<b>Total Housing Capacity</b>	<b>2044 Housing Target</b>	<b>Share of Housing Target in Regional Geography (Core Cities)</b>
<b>Kent</b>	11,248	10,200	9%

*Source: 2021 King County Urban Growth Capacity Report, Exhibit 55*

## Updates to the Kent Buildable Lands Inventory

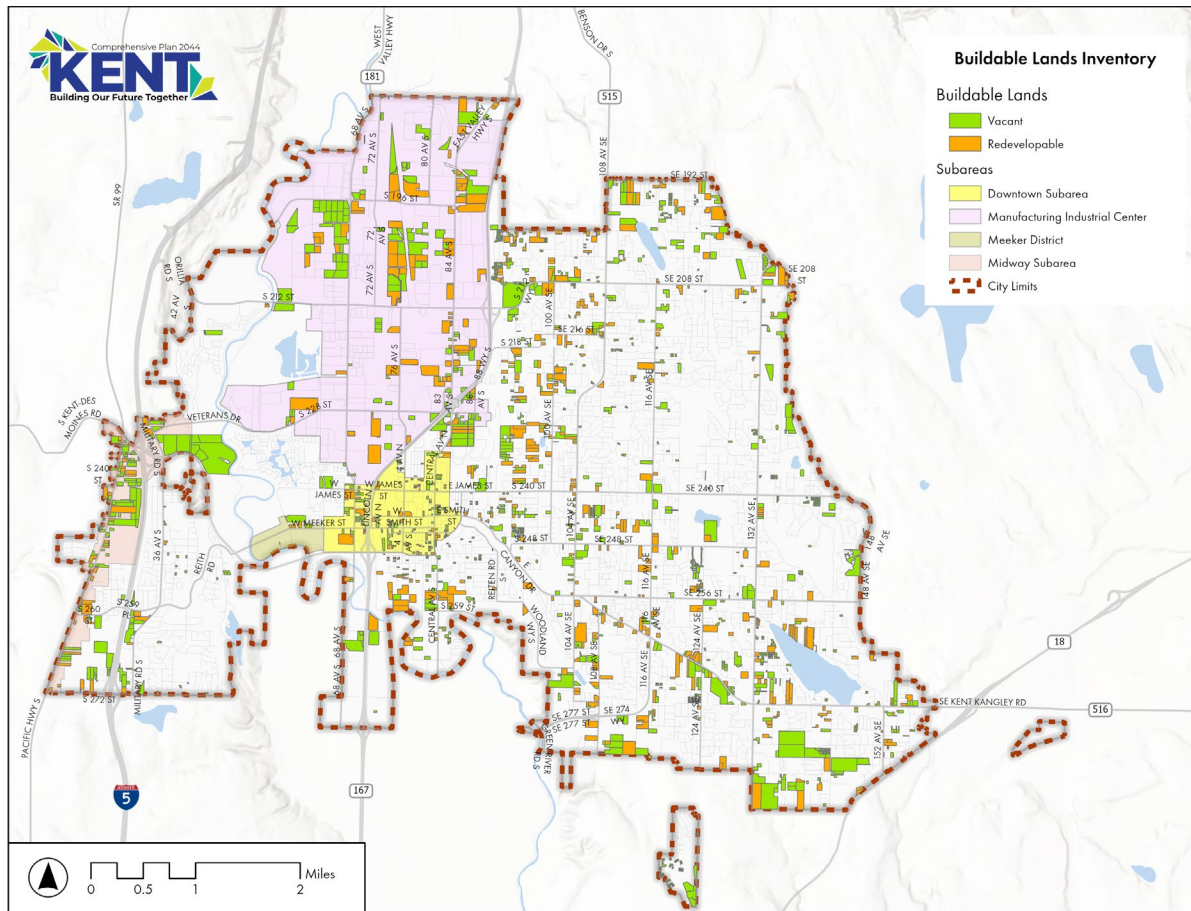
As part of the Comprehensive Plan update, the City of Kent has identified the development and changes to buildable lands that have occurred since data was collected for the UGC Report in 2018. These updates include new residential subdivisions, development and redevelopment of industrial areas, and modifications to the City’s zoning designations.

The following information was used to update the 2018 inventory:

- Updated zoning designations reflecting changes adopted in 2023
- 2023 GIS Parcel database
- Permit data describing development activity since 2018
- Aerial photo review

The updated land capacity analysis is detailed in Table . Additional detail about the LCA methodology is provided below for further information, however only the inventory of parcels has been updated for the purpose of this analysis; other assumptions such as densities remain consistent with the 2021 UGC report.

Figure 1. Updated Kent Buildable Lands Inventory



## Land Use Scenario Development

The Draft Environmental Impact Statement (Draft EIS) analyzes three land use alternatives that include one No Action Alternative and two Action Alternatives for the City's study area. These alternatives were created with input from elected and appointed officials as well as the public to envision possibilities for Kent's future.

The alternatives include Alternative 1: No Action, Alternative 2: Nodes and Corridors, and Alternative 3: Core with Transit Links. All three alternatives would build upon existing growth patterns and assume the same existing capacity as identified in the King County Urban Growth Capacity Report. While Kent's baseline capacity is consistent among all three alternatives, each alternative tests a different distribution of growth within Kent to highlight a spectrum of policy choices.

The best-performing attributes from Alternative 2 and Alternative 3 were combined to create the Preferred Alternative. This alternative was confirmed by the Kent City Council in August 2024. The alternatives are described further below.

## Alternative 1: No Action

This alternative tests development outcomes under existing land use regulations. In order to save resources and improve consistency with other planning efforts, the No Action Alternative is the same as the scenario created for the City's Transportation Master Plan. This alternative meets 2044 targets for housing growth and the target for employment growth. A No Action alternative is required by the State Environmental Policy Act (SEPA).

## Alternative 2: Nodes & Corridors

This alternative includes greater development intensity in the City's Regional Growth Centers (Downtown/Meeker, Midway, and the Industrial Valley). New activity centers are located along the Benson Corridor and at key intersections in East Hill, and significant new development in the Countywide Growth Center at 104<sup>th</sup> Avenue and 256<sup>th</sup> Street. This alternative exceeds 2044 targets for employment and exceeds targets for housing growth.

## Alternative 3: Core with Transit Links

This alternative concentrates growth in the City's Regional Centers (Downtown/Meeker, Midway, and the Industrial Valley) along with modest growth along the Benson Corridor and East Hill. Alternative 3 also includes an assumption of middle housing redevelopment in the City's existing neighborhoods and along transit corridors.<sup>3</sup> This alternative meets 2044 targets for employment and exceeds targets for housing growth.

## Preferred Alternative

This alternative includes elements from both Alternative 2: Nodes & Corridors and Alternative 3: Core with Transit Links. It includes investment and growth in nodes in the East Hill and mixed use along Benson Corridor as well as assumptions for redevelopment of

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<sup>3</sup> In the City of Kent, there are roughly 23,500 single-family detached dwelling units. Due to recent middle housing legislation in the State of Washington, single-family lots may subdivide into various middle housing types from duplexes to six-plexes, depending on site characteristics. Lots within ¼ mile of transit have even greater allowances and may see additional infill.

Middle housing legislation was only enacted recently, and interest rates have seen a significant shift, making predictions difficult. However the Preferred Alternative estimates impacts based on some general assumptions:

- For lots greater than ¼ mile walking distance from high frequency transit: Assume 2% of all Single Family Dwellings (SFD) become middle housing, averaging 2.2 units per lot. This nets 643 new middle housing units.
- For lots within ¼ mile walking distance of transit: Assume 5% of all SFD become middle housing, averaging 4 units per lot. This nets 354 new middle housing units.
- Based on these assumptions, there are a total 997 new middle housing units expected throughout the City as part of infill and redevelopment.

middle housing within existing neighborhoods and along transit corridors. The preferred alternative meets 2044 targets for employment and exceeds targets for housing growth.

To evaluate the capacity of each alternative, a set of “Place Types” was created in Urban Footprint and applied to parcels identified as vacant or redevelopable in the King County UGC Report, minus properties that had been developed in the interim. In some cases, additional redevelopment was assumed due to specific policy decisions such as inclusion of the proposed Regional Growth Center in Alternative 2 and the Preferred Alternative. Place types are described in

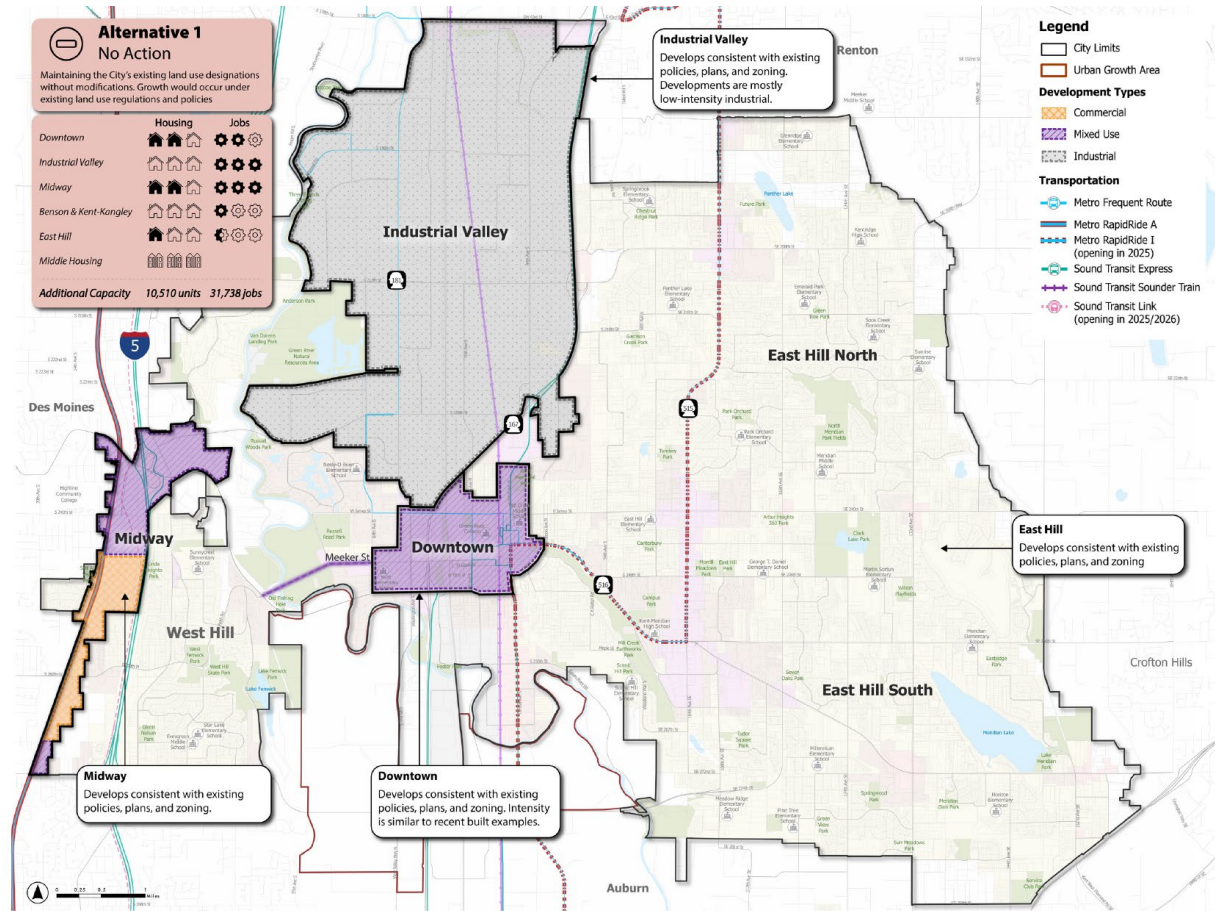
Table 2. Place Types

Future Land Use/ Zone	“Place Type” Name	Gross Dwelling Units/Jobs per Acre	Notes
SINGLE FAMILY (SF) RESIDENTIAL			
SR-1	SF Residential 1	~1 du/ac	Modeled as SF Residential development at lot sizes corresponding to zoning designation
SR-3 / SR-4.5	SF Residential 2	~3 du/ac	
SR-6 / SR-8	SF Residential 3	~4.6 du/ac	
MULTIFAMILY (MF) RESIDENTIAL			
MR-D MR-T12	MF Residential 1	~11.5 du/ac	Small lot detached, townhomes, and duplexes
MR-T16 MR-G	MF Residential 2	~15.7 du/ac	Garden Apartments, townhomes, small lot detached
MR-M	MF Residential 3	~20 du/ac	Garden Apartments, Townhomes
MR-H	MF Residential 4	~36 du/ac	Multifamily Apartments, Condos
COMMERCIAL			
GC GC-MU	General Commercial	~20 emp/ac	Low/Medium Intensity Commercial
CC CC-MU NCC	Neighborhood-Scale Mixed Use	~32 emp/ac ~3 du/ac	Main Street Commercial, Low Intensity Mixed Commercial/Residential

Future Land Use/ Zone	"Place Type" Name	Gross Dwelling Units/Jobs per Acre	Notes
<b>INDUSTRIAL</b>			
I1	Office/Industrial	~35 emp/ac	.Office, warehousing, industrial, some commercial
	Mixed Office/R&D	~43 emp/ac	
I2 CM	Mixed Employment Park	~20 emp/ac	Warehousing, light industrial, some office
I3	Industrial High	~24 emp/ac	Higher intensity industrial and warehousing
<b>MIXED USE DISTRICTS</b>			
DCE / DCE-T	City-Scale Mixed Use	~7 du/ac ; ~36 emp/ac	Low-rise office, multifamily, commercial, mixed-use structures  Midway area modeled through commercial, residential, and mixed use sites to match previous modeling
		~30 du/ac ; ~59 emp/ac	
MCR/MTC/MTC-2	Various (see note)	~36 du/ac ~20 emp/ac	



Figure 2. Alternative 1 Overview



Source: Prepared by MIG, Inc. using data provided by the City of Kent

Figure 3. Alternative 1 Detailed Assumptions

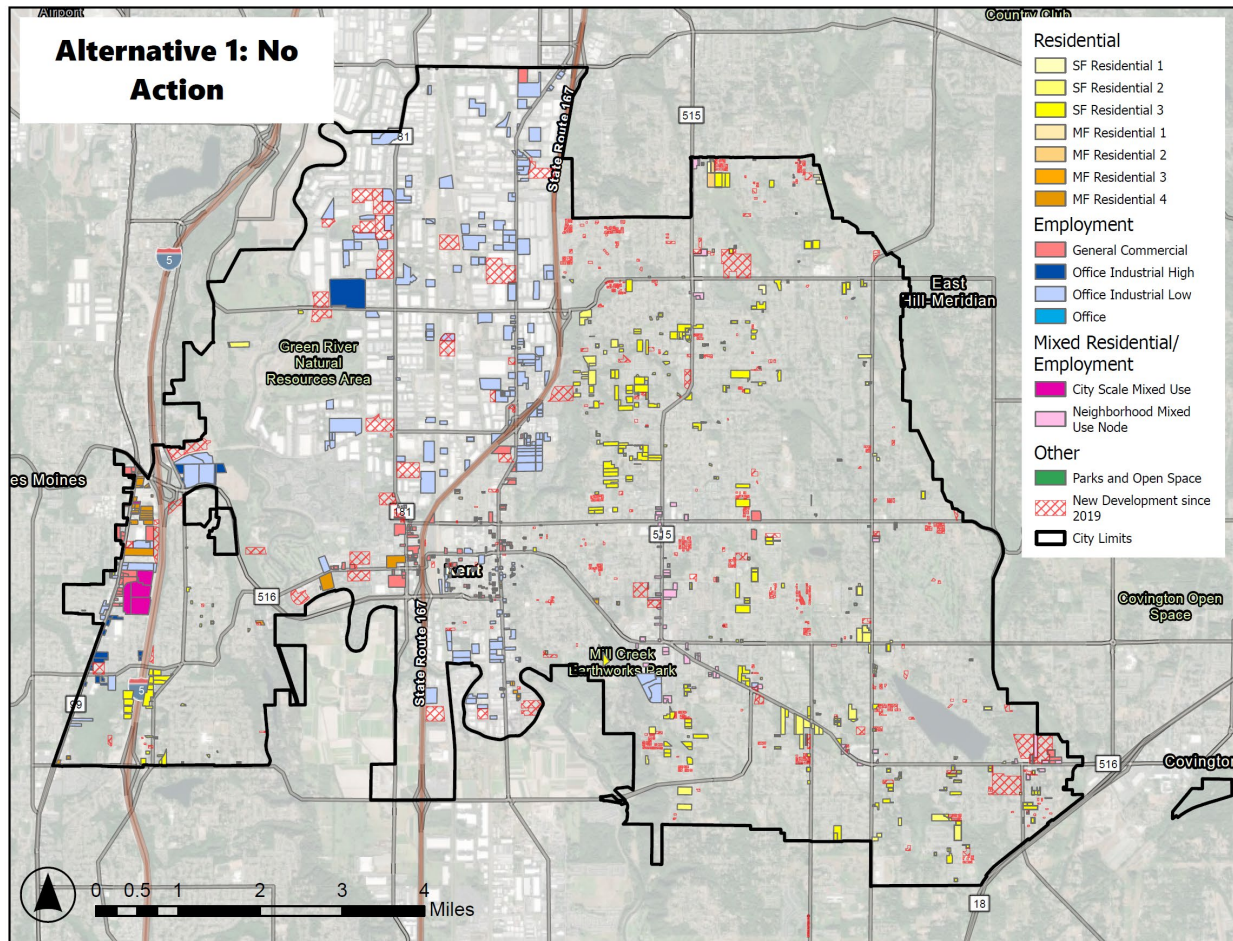
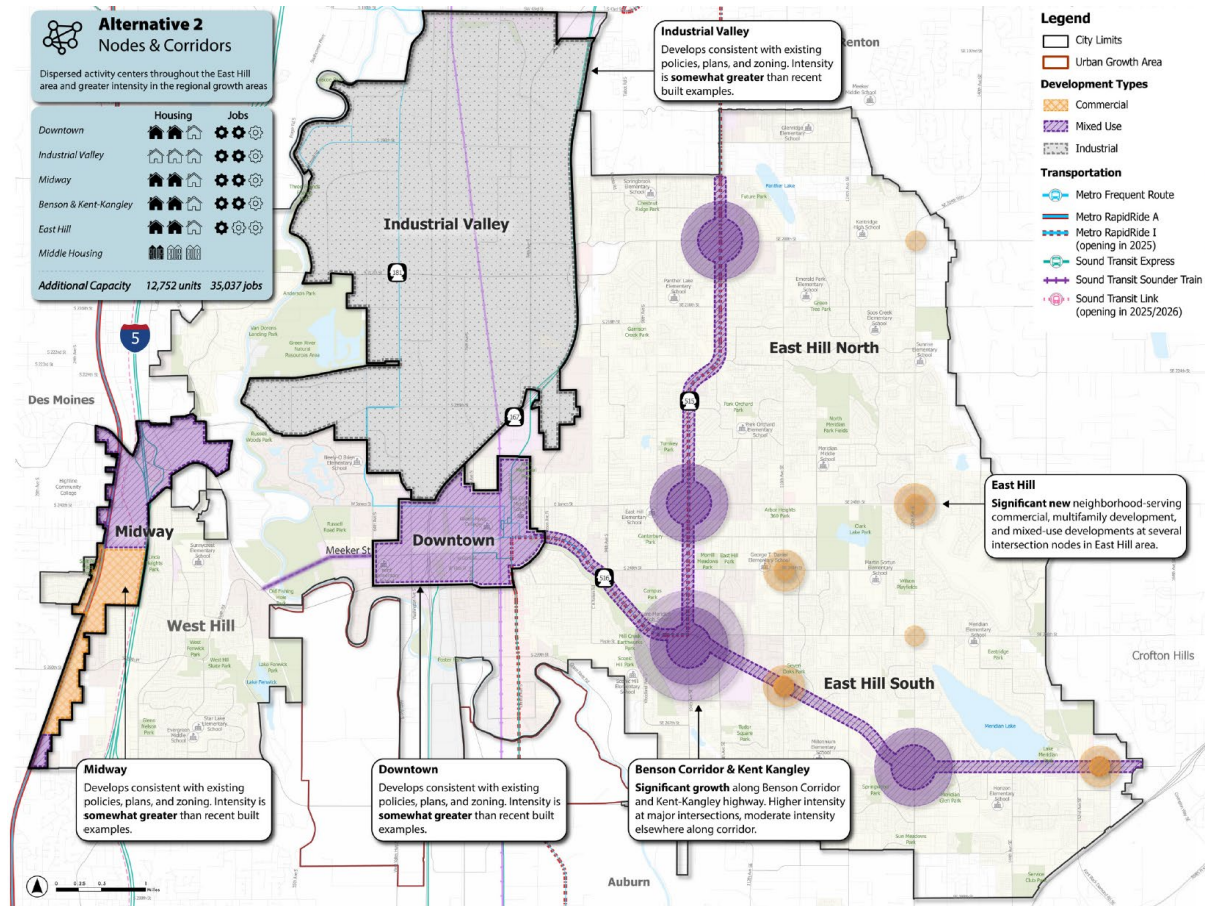




Figure 4. Alternative 2 Overview



Source: Prepared by MIG, Inc. using data provided by the City of Kent

Figure 5. Alternative 2 Detailed Assumptions

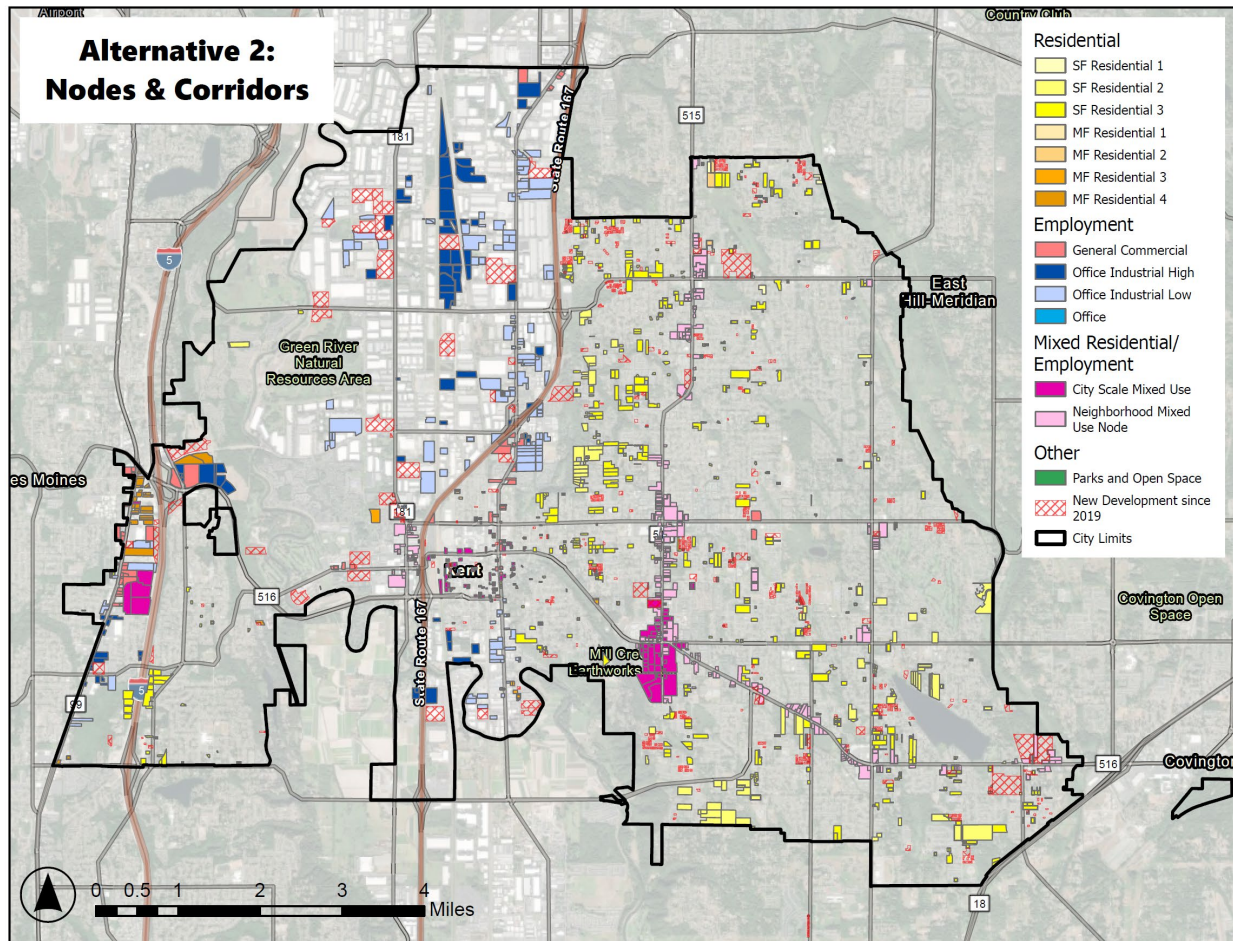




Figure 6. Alternative 3 Overview

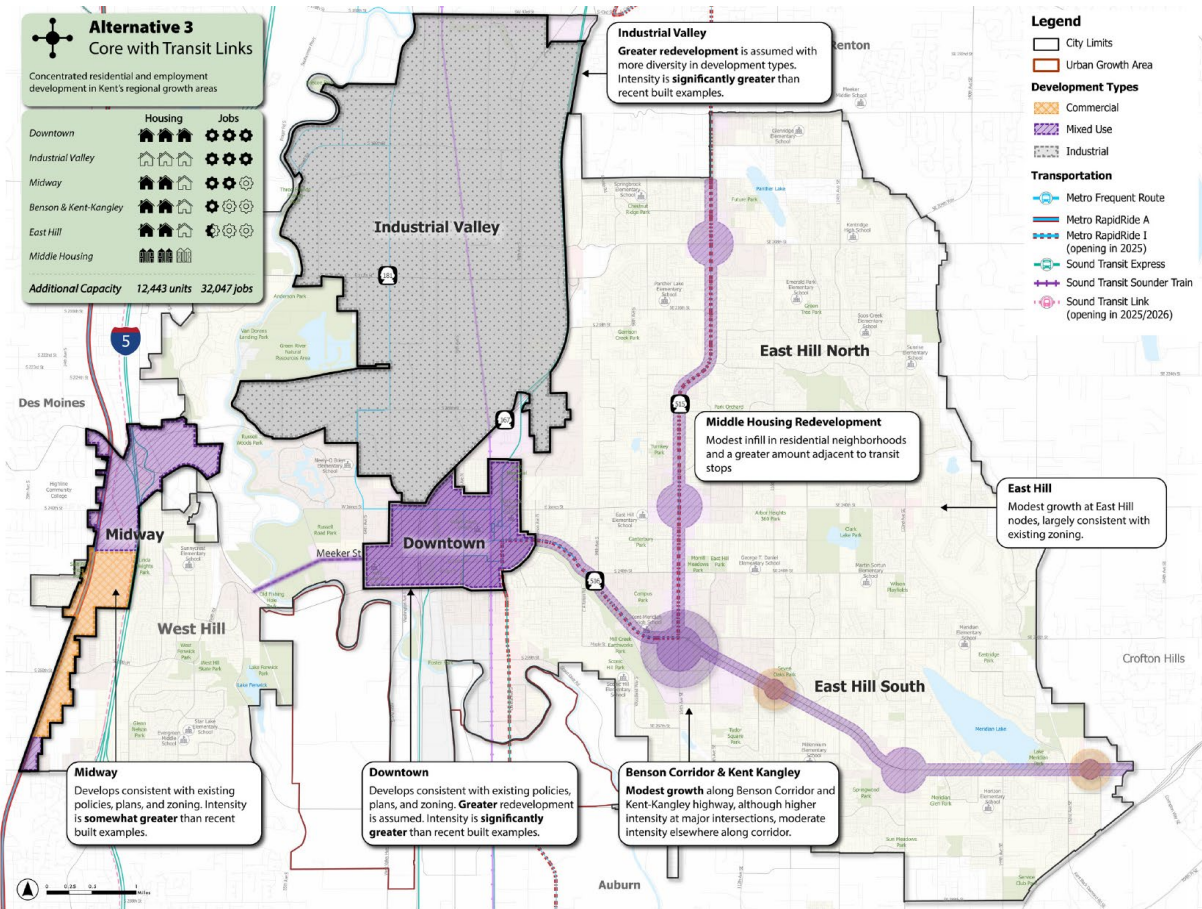


Figure 7. Alternative 3 Detailed Assumptions

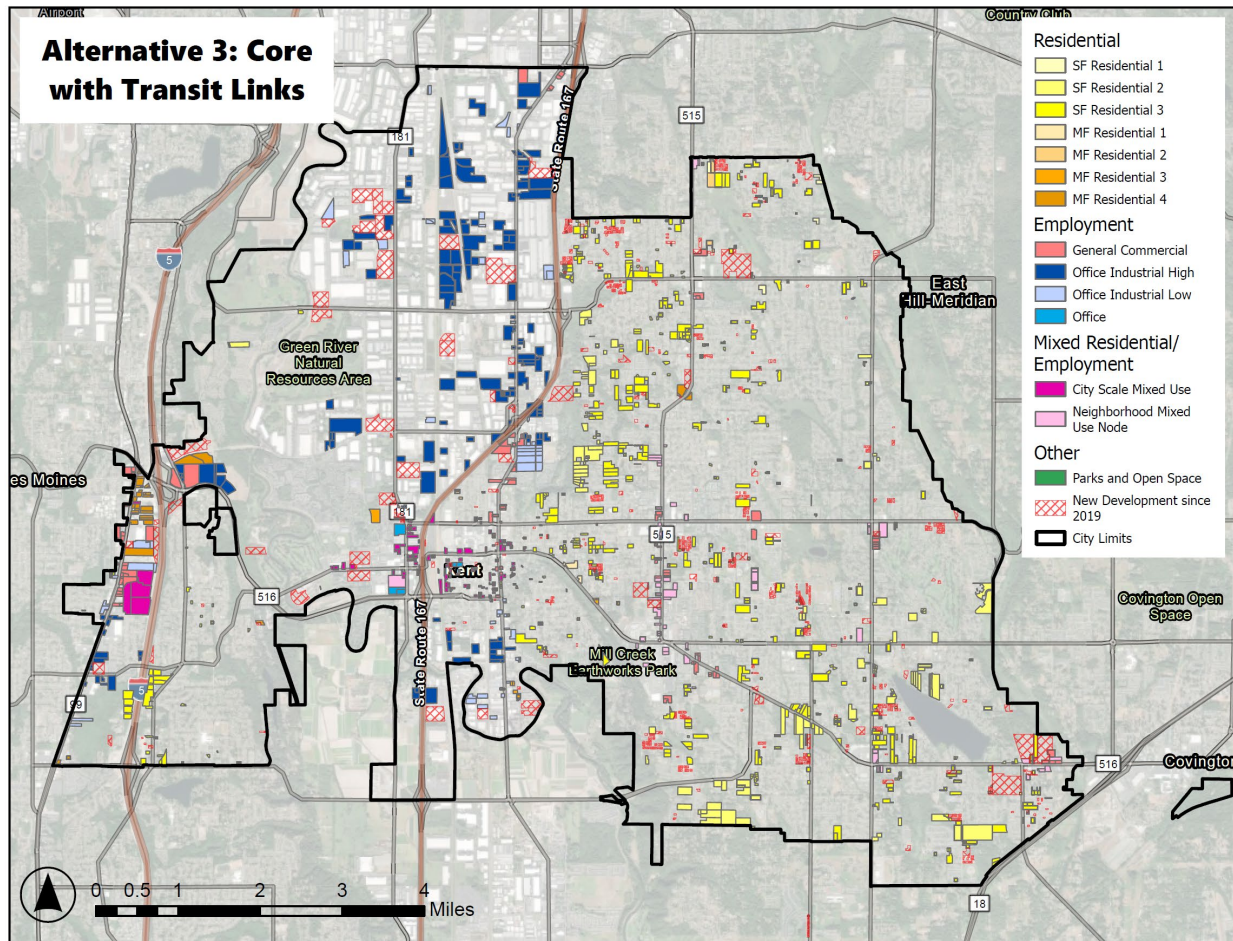
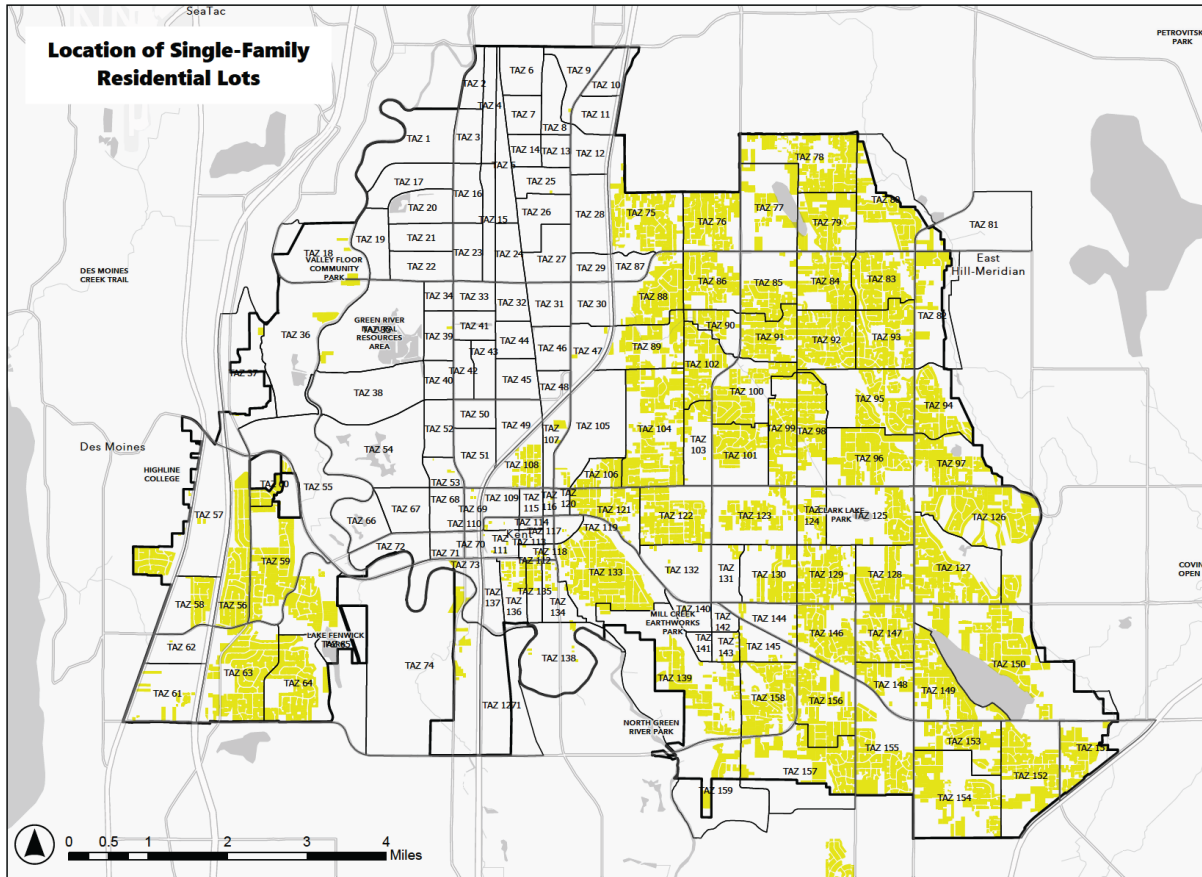


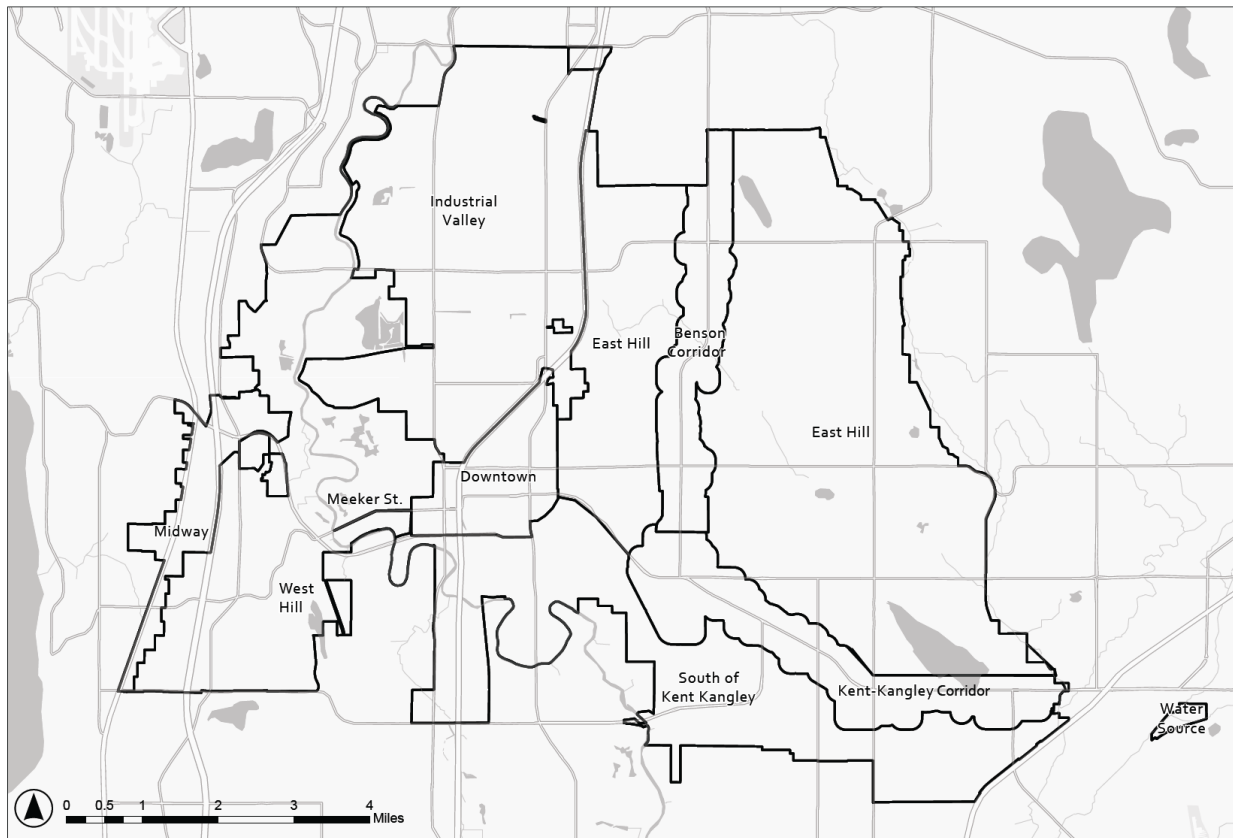
Figure 8. Existing Single Family Homes in Kent (for Middle Housing Redevelopment Assumptions)



Source: Prepared by MIG, Inc. using data provided by the City of Kent and Urban Footprint



Figure 9. City of Kent Subareas (For Capacity Reporting)



Source: Prepared by MIG, Inc. using data provided by the City of Kent

Note: These are general areas that were used in the growth calculations for the alternatives and do not align with established or adopted sub-area boundaries. This figure was created for the reader of this Draft EIS to understand where and how much growth would occur citywide under each of the alternatives.

Table 3. Unit Growth by Subarea, Alternatives 1-3 and Preferred Alternative

Planning Area	Alternative 1: No Action		Alternative 2: Nodes & Corridors		Alternative 3: Core with Transit Links		Preferred Alternative	
	Dwelling Units	Jobs	Dwelling Units	Jobs	Dwelling Units	Jobs	Dwelling Units	Jobs
Downtown	3,058	3,670	918	2,599	1,646	4,019	1,126	2,775
East Hill (except Benson and Kent-Kangley Corridors)	1,405	1,258	2,516	1,368	3,123	912	2,876	687
Benson Corridor	495	751	842	3,740	1,055	746	1,150	834
Kent-Kangley	465	2,019	2,780	6,294	495	1,675	1,786	5,659
Industrial Valley	-	16,271	-	15,070	-	18,304	0	16,293
Meeker Street	1,546	1,408	1,146	63	1,220	147	1,220	147
Midway	2,813	4,211	3,315	3,927	3,335	3,921	3,329	3,921
South of Kent-Kangley	504	1,647	818	1,609	1,111	1,929	786	1,905
West Hill	224	301	331	342	457	342	415	342
<b>Total</b>	<b>10,510</b>	<b>31,738</b>	<b>12,752</b>	<b>35,037</b>	<b>12,443</b>	<b>32,047</b>	<b>12,688</b>	<b>32,563</b>

## Land Capacity Analysis by Income Band

The Department of Commerce HB 1220 Book 2 provides detailed guidance for conducting an LCA and explains how to compare land capacity to housing needs by income band. The following section applies the Commerce methodology to Kent's LCA.

### Needed Housing by Income Level

RCW 36.70A.030 describes the following income levels in terms of Area Median Income (AMI). Each income category has been assigned a growth target for the City of Kent, as follows. Nearly half of Kent's growth target lies in high income units, which are generally assumed to be provided by the housing market. Table 4 shows the number of new residential units needed in each income category. These numbers were established through a process with the King County Growth

Management Planning Council (GMPC) and are adopted in the King County Countywide Planning Policies.

Table 4. Housing Growth Targets by Income Category

Income Category	Growth Target (units)
Extremely Low Income - (0-30% AMI (Permanent Supportive Housing)):	984
Extremely Low Income - (0-30% (Non PSH)):	1,872
Very Low Income - (>30-50% AMI):	788
Low Income - (>50-80% AMI):	318
Moderate Income - (>80-100% AMI):	820
Moderate Income - (>100% - 120% AMI):	929
High Income - (>120% AMI):	4,489
<b>Total</b>	<b>10,200</b>

## Step 1: Perform analysis of land capacity by zone

This step was completed by updating Kent's BLI from the 2021 King County UGC, as previously discussed.

## Step 2: Classify zones by allowed housing types and density levels

Commerce guidance provides the following examples for how to classify zones by housing types, which informed the categorization of primary housing type identified in the following table.

Table 5. HB 1220 Book 2 example of categories for classifying zones by housing types allowed

Zone category	Typical housing types allowed*
Low Density	Detached single-family homes
Moderate Density	Townhomes, duplex, triplex, quadplex
Low-Rise Multifamily	Walk-up apartments or condominiums (up to 3 floors)
Mid-Rise Multifamily	Apartments or condominiums in buildings with ~4-8 floors (~40-85 feet in height)
High-Rise/Tower**	Apartments or condominiums in buildings with ~9 or more floors (>85 feet in height) and requiring steel frame construction

\* Manufactured homes are not listed as a housing type because by law they should be allowed in all zones.

\*\* High-Rise/Tower zones are likely to be relevant only in major metropolitan cities.

Table 6. Zoning, Place Types, Housing Types, and Zoning Categories for Analysis

City of Kent Zoning	“Place Type” Categories	Housing Type(s)	Zone Category
Low-density Residential			
SR-1	SF Residential 1	Detached Single-Family. Middle Housing Infill (2-6 plex)	Low Density
SR-3			
SR-4.5	SF Residential 2		Middle Housing Infill
SR-6	SF Residential 3		
SR-8			
Moderate-density Residential			
MR-D		Townhomes, 2-6plex	Moderate Density
MR-T12	MF Residential 1		
MR-T16	MF Residential 2		
MR-G			
MHP	N/A	Manufactured Homes	
MR-M	MF Residential 3	Walk-up apartments	Low-rise Multifamily / Mixed Use
MR-H	MF Residential 4		
NCC	Neighborhood-Scale Mixed Use		
CC-MU			
DCE			
DCE-T	City-Scale Mixed Use	Mid-rise apartments, condominiums, Mixed Use	Mid-rise Multifamily/ Mixed Use
GC-MU			
MTC-1			
MTC-2			
MCR			

### Step 3: Relate zone categories to potential income levels served

Commerce guidance provides the following examples for how to relate zone categories to housing types and income categories.

Table 7. Commerce example of relating zone categories to housing types and income levels

Zone category	Typical housing types allowed	Lowest potential income level served		Assumed affordability level for capacity analysis
		Market rate	With subsidies and/or incentives	
Low Density	Detached single family homes	Higher income (>120% AMI)	Not typically feasible at scale*	Higher income (>120% AMI)
Moderate Density	Townhomes, duplex, triplex, quadplex	Moderate income (>80-120% AMI)	Not typically feasible at scale*	Moderate income (>80-120% AMI)
Low-Rise Multifamily	Walk-up apartments, condominiums (2-3-floors)	Low income (>50-80% AMI)	Extremely low and Very low income (0-50% AMI)	Low income (0-80% AMI) and PSH
Mid-Rise Multifamily	Apartments, condominiums	Low income (>50-80% AMI)	Extremely low and Very low income (0-50% AMI)	Low income (0-80% AMI) and PSH
ADUs (all zones)	Accessory Dwelling Units on developed residential lots	Low income (>50-80% AMI)	N/A	Low income (>50-80% AMI) – Group with Low-Rise and/or Mid-Rise Multifamily

Table 8 shows how each zone category for Kent relates to assumed affordability levels. Assumptions for low-rise Multifamily / Mixed Use and Mid-Rise Multifamily / Mixed Use are assumed to be split across income bands to acknowledge that some new construction of these types will serve moderate and higher income households.

Table 8. Affordability Assumptions by Zone Category and Housing Types for Kent LCA

Zone Category	Typical Housing Types Allowed	Lowest Potential Income Level Served		Assumed Affordability Level for Analysis
		Market Rate	With Subsidies	
<b>Low Density</b>	Detached Single Family Homes,	Higher Income (>120% AMI)	Not typically feasible at scale	<b>Higher Income (&gt;120% AMI)</b>
<b>Moderate Density</b>	Townhomes, 2-4plex	Moderate Income (80%-120% AMI)	Not typically feasible at scale	<b>20% High Income (&gt;120% AMI), 40% Moderate Income (80-120% AMI), 40% Low Income (50-80% AMI)</b>
<b>Low-Rise Multifamily / Mid-Rise Multifamily / Mixed Use</b>	Walk-up Apartments, Mid-Rise Apartments, Condominiums, PSH	Low Income (50%-80% AMI)	Extremely Low and Very Low Income (0-50% AMI)	<b>65% Low Income (0-80% AMI), 20% Moderate Income (80-120% AMI), 20% High Income (&gt;120% AMI)</b>
<b>Middle Housing Infill</b>	2-6 Plexes, Townhomes	Moderate Income (80%-120% AMI)	Not typically feasible at scale	<b>20% High Income (120%+ AMI), 40% Middle Income (80-120% AMI), 40% Low Income (50-80% AMI)</b>



Table 9 aggregates projected housing needs identified in Table 4 into categories defined by zone categories. These new income ranges are 120%+ AMI, 80-120% AMI, and 0-80% AMI.

Table 9. Aggregated Need and Zone Categories by Income

Income Level	Projected Housing Need	Zone Categories Serving These Levels	Aggregated Need
>120%	4,489	Low Density, Market Rate Low/Mid/High Rise Multifamily and Mixed Use	4,489
100-120%	929	Moderate Density, Market Rate	1,749
80-100%	820	Low/Mid/ High Rise Multifamily and Mixed Use	
0-30% PSH	984	Subsidized Moderate Density, Low/Mid/High Rise Multifamily and Mixed Use	
0-30% Non PSH	1,872		
30-50%	788		
50-80%	318		
Total	10,200		10,200

Table 10 compares the residential capacity of the preferred alternative to the aggregated need categories of Table 9. When applying the assumptions of income distribution listed in Table 8, the Preferred Alternative meets the aggregated housing needs by aggregated income range.

Table 10. Kent Preferred Alternative Housing Capacity by Income Range

Income Range Served	Housing Types	Aggregate Need		Preferred Alternative	
120%+ AMI	Detached Single Family, some Middle Housing and Multifamily	4,489	44%	4,767	38%
80-120% AMI	Townhomes, 2-6plex, Some Middle Housing and Multifamily	1,749	17%	3,513	28%
0-80% AMI	Low-rise Multifamily, Mid-rise Multifamily, Mixed Use, Manufactured Homes	3,962	39%	4,409	35%
<b>Total</b>		<b>10,200</b>	<b>100%</b>	<b>12,688</b>	<b>100%</b>