



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.
<p>Prohibiting some moderate density housing types, such as:</p> <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.
<p>High impervious coverage limits</p>	<p>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.</p>	<p>reductions in on-site parking.</p> <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. 	<p>Limited options are available. Note that upzoning will likely occur under the Plan that will increase allowable impervious coverage in certain areas.</p>
<p>Lack of alignment between building codes and development codes</p>	<p>No. No substantial housing impacts are expected with respect to housing production and building codes, but there are some needs for change.</p>	<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. 	
<p>Other (for example: complex design standards, tree retention regulations, historic preservation requirements)</p>	<p>No. While there may be some limited impacts from other development regulations, no other major obstacles have been identified as a concern for production.</p>	<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.
<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 moderate housing 	<p>Not applicable.</p>
<p>Design review</p>	<p>No. This is not applicable for most types of development, excluding a limited number of</p>	<ul style="list-style-type: none"> None except for downtown historic. 	<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.
	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.
PROCESS OBSTACLES			
<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			
<p>Spacing requirements (for example, minimum distance from parks, schools or other emergency/PSH housing facilities)²</p>	<p>Yes. There are no exemptions specified for religious organizations as described under the statute for notification requirements related to schools and child care facilities.</p>	<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.
<p>Parking requirements</p>	<p>No. However, the provisions of temporary uses do not include</p>	<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.
<p>DEVELOPMENT REGULATIONS</p>			
<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. 	<p>No. Current requirements under the BMC were revised by Ordinance 2415 in March 2024 to fulfill these requirements.</p>	<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.
<p>Unclear development regulations</p>	<p>No. While current development regulations need to be reviewed for compliance, development regulations are clear.</p>	<p>Bothell Municipal Code provides clear directions on ADUs. Revisions as noted above should be reviewed to maintain clarity in requirements.</p>	<ul style="list-style-type: none"> ○ Regulations will be updated to both ensure consistency with HB 1337 and maintain clarity on requirements and regulations.
<p>Large setback requirements</p>	<p>Yes. There are no specific setback requirements for ADUs, but some</p>	<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.