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APPENDIX D1

Growth Targets and the Urban Growth Area



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48

I. Abstract

49

50 This appendix provides an analysis of the amount of growth King County and cities in King County are
51 planning for within the Urban Growth Area (UGA) for the 20-year planning period of the 2024
52 Comprehensive Plan, and the capacity available to accommodate it. It also provides a similar analysis for
53 urban unincorporated King County. The purpose of these analyses is to ensure that the UGA is
54 appropriately sized to accommodate the housing and employment projected during the planning period of
55 the Comprehensive Plan.

56

57 Appendix D was originally prepared for the 1994 Comprehensive Plan in support of the creation of King
58 County's UGA Boundary and has been supplemented with new appendices in periodic and major updates
59 since 2004, including this 2024 Appendix. Those supplements incorporate the 1994 Appendix D by
60 reference but do not address issues already covered by the original, such as delineation of the Urban
61 Growth Area. Therefore, they supplement but do not replace the 1994 Appendix D.

62

63 The key inputs to the analysis in this appendix are housing and employment growth projections adopted as
64 growth targets in Table DP-1 of the 2021 King County Countywide Planning Policies and estimates of
65 developable capacity contained in the 2021 King County Urban Growth Capacity Report.¹ The growth
66 targets adopted in the Countywide Planning Policies are consistent with the Growth Management
67 Population Projections developed by the Washington State Office of Financial Management (OFM), and the
68 Puget Sound Regional Council's VISION 2050 Regional Growth Strategy.² The Urban Growth Capacity
69 Report³ contains the required review of the UGA and urban patterns of development compared to
70 planning objectives and goals. The 2021 King County Urban Growth Capacity Report was accepted by the
71 Washington State Department of Commerce in June 2021.

72

73 King County's UGA is sized to adequately accommodate projected growth while also accounting for
74 unpredictable circumstances that could alter the calculated supply of urban growth capacity or the number
75 of housing units needed to accommodate projected population growth. The location of the UGA includes
76 areas of the county that already have urban services or have solid commitments for future urban services,
77 and as a result, would be inconsistent with the criteria for rural or Natural Resource Lands. The most recent
78 developable capacity information, analyzed in the 2021 King County Urban Growth Capacity Report affirms
79 the adequacy of the existing UGA to accommodate all the county's projected growth through 2044. This is
80 true both for the entire UGA and for the unincorporated portions of the UGA.

81

82

II. Background

83

84 A foundational element of growth management planning in Washington state is the designation of urban,
85 rural, and natural resource lands. Urban land is composed primarily of incorporated cities and towns, and
86 secondarily of portions of unincorporated King County. Certain mapped urban lands may also be subject to
87 the sovereign governmental authority of Indian tribes. Rural and Natural Resource Lands are portions of
88 unincorporated King County, certain sub-portions of which are owned by, or held in trust for, Indian tribes.
89 The Growth Management Act (GMA) requires the delineation of urban lands by establishment of the urban
90 growth area (UGA), and of rural and natural resource lands by designation pursuant to comprehensive land
91 use and zoning. While the GMA requires coordination of local plans, and population and employment
92 projections are tacitly inclusive of tribal growth, Indian tribes have historically not been included in
93 discussions about allocating urban growth within King County. King County recognizes that urban, rural,

¹ 2021 King County Countywide Planning Policies [\[LINK\]](#); 2021 King County Urban Growth Capacity Report, ratified 2022 [\[LINK\]](#)

² Washington State Office of Financial Management, Growth Management Act County Projections, 2022 [\[LINK\]](#); Puget Sound Regional Council, VISION 2050 [\[LINK\]](#)

³ Required by Revised Code of Washington (RCW) 36.70A.215 [\[LINK\]](#), and RCW 36.70A.130 [\[LINK\]](#)

94 and natural resource lands are inclusive of certain lands held and governed by Indian tribes, and King
95 County will coordinate with Indian tribes as a part of County and countywide planning processes.
96

97 The 1992 Countywide Planning Policies established a framework UGA for King County. The County initially
98 designated the UGA in its 1994 Comprehensive Plan based on this framework. Each city or town within King
99 County is responsible for determining, through its comprehensive plan, land use within its borders,
100 including accommodating the broad range of residential and nonresidential uses associated with urban
101 growth. King County is responsible for establishing land use in the unincorporated portion of the UGA
102 through its comprehensive plan.
103

104 Key factors used in setting the UGA size include population and employment projections, growth targets,
105 and land capacity. Population and employment projections are predictions about likely future growth based
106 on past trends. Growth targets are a jurisdiction's policy statement on the quantity of net new housing units
107 and jobs it plans to accommodate over the 20-year planning period based on projections and the
108 jurisdiction's role in the regional growth strategy. Land capacity is derived from an estimate of vacant land
109 plus the redevelopment potential of land already partially developed or underutilized. Discount factors are
110 applied to the estimate of land capacity to account for probable constraints and likelihood of developing
111 the land over the 20-year planning period.
112

113 Population and employment projections are useful as an indicator of the potential future demand for land
114 capacity. Growth targets follow the development of specific goals and objectives for future growth, and
115 under the GMA, they must be supported by commitments of funds, incentives, and regulations. Discounted
116 capacity is a market-constrained estimate of how much growth may be accommodated in a geographic
117 area.
118

119 Under the GMA, each county is required to plan to accommodate 20 years of population growth in its
120 comprehensive plan. Counties are to establish a UGA "within which urban growth shall be encouraged and
121 outside of which growth can occur only if it is not urban in nature."⁴ Further, based on OFM population
122 projections, the GMA requires the UGA to "include areas and densities sufficient to permit the urban growth
123 that is projected to occur in the county for the succeeding twenty-year period."⁵ As part of the county's
124 planning, it must accommodate housing and employment growth targets, including institutional and other
125 nonresidential uses. All cities are places for urban growth and, by law, must be included within the UGA.⁶ In
126 addition, unincorporated areas may be included within the UGA "only if such territory already is
127 characterized by urban growth or is adjacent to territory already characterized by urban growth."⁷ The UGA
128 must also include greenbelt and open space areas. Several GMA goals, such as those dealing with
129 affordable housing, economic development, open space, recreation, and the environment, also have an
130 important bearing on these UGA requirements. These goals need to be balanced with those which
131 encourage efficient urban growth and discourage urban sprawl.
132

133 The concurrency goal for public facilities and services in the GMA directs jurisdictions to ensure that "those
134 public facilities and services necessary to support development shall be adequate to serve the development
135 at the time the development is available for occupancy without decreasing current service levels below
136 locally established minimum standards."⁸ King County also coordinates with school districts to ensure that
137 schools are able to plan for projected growth. Ensuring adequate land capacity for industrial and
138 commercial development and providing enough land capacity to allow for choices in where people live can
139 help advance economic development and maintain housing affordability. If the UGA is adequately sized,
140 then pressures to develop on environmentally constrained land and areas set aside for open space are
141 reduced.

⁴ RCW 36.70A.110(1) [\[LINK\]](#)

⁵ RCW 36.70A.110(2) [\[LINK\]](#)

⁶ RCW 36.70A.110(1) [\[LINK\]](#)

⁷ RCW 36.70A.110(2) [\[LINK\]](#)

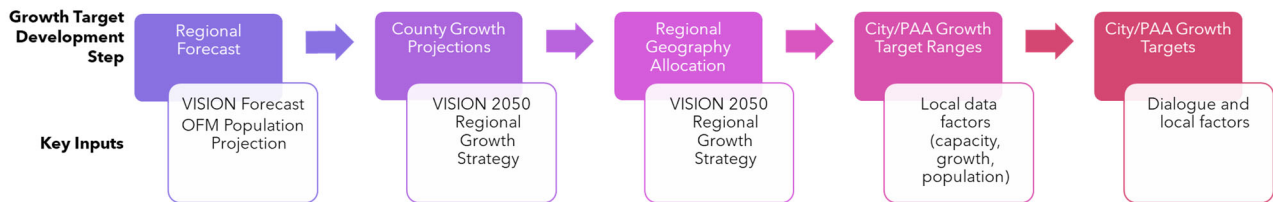
⁸ RCW 36.70A.020(12) [\[LINK\]](#)

III. Size of the Urban Growth Area

A. Growth to be Accommodated

As shown in **Figure 1: Growth Targets Development Process** below, establishing the amount of population, housing, employment growth to be accommodated countywide and in individual King County jurisdictions begins with countywide and regional forecasts. Growth is allocated to King County and to groups of jurisdictions called “Regional Geographies” via VISION 2050’s Regional Growth Strategy, and population growth is then converted to housing growth. Finally, jurisdictions grouped by Regional Geography collaboratively determine jurisdictional-level housing and employment growth targets based on local factors and input.

Figure 1: Growth Targets Development Process



PAA means Potential Annexation Area

1. Projected Countywide Growth

Forecasted population growth is generally sourced from the most recent OFM growth management population projections, which are prepared at a countywide level. The OFM projections from 2017 were the most current forecast available during the target setting process in 2020 and 2021. The OFM projections contain “high,” “medium,” and “low” series of projected growth. King County has planned for the medium-series population growth projections in past Comprehensive Plan updates. In December 2022, OFM published a new population projection based on updated Census data and forecast assumptions. The 2022 medium series is approximately 1,000 persons greater from the 2017 medium series in the year 2044 (the last year in the planning period). Because of the limited differences between the 2017 and 2022 projections, the current countywide growth allocations adopted in the Countywide Planning Policies and the Comprehensive Plan are consistent with the 2022 projections.

In 2017, in preparation of VISION 2050, the Puget Sound Regional Council (PSRC) produced a regional forecast for its jurisdiction, which includes King, Kitsap, Pierce, and Snohomish Counties, forecasting population and employment through 2050. This forecast was used as the source for projected employment growth in past Comprehensive Plan updates. The PSRC forecasted population is comparable to the 2017 OFM population projection medium series for the four-county PSRC region. Because of the similar population projection, the use of the PSRC employment forecast for determining employment growth targets, and the primacy of VISION 2050’s Regional Growth Strategy in allocating growth within the region, King County utilized the PSRC forecast as the source for countywide growth allocations in developing 2019-2044 growth targets.

As the PSRC forecast is at a regional scale, countywide shares of population and employment growth are applied to the regional totals to project growth for King County alone. These shares derive from VISION 2050’s Regional Growth Strategy.⁹ The resulting population and job growth form King County’s projected

⁹ Puget Sound Regional Council, VISION 2050 Regional Growth Strategy [\[LINK\]](#)

182 countywide growth allocations for the 2019-2044 period. Figure 2 below shows how countywide growth
 183 allocations were determined.
 184

185 **Figure 2: Countywide Population and Employment Projections**

Scale		Step	Calculation	Population	Employment	Explanation and Sources
Regional	A	2019 Estimate	N/A	4,203,400	2,295,608	Base year estimates Sources: OFM Population Estimates, PSRC Total Employment Estimates
	B	2044 Projection	N/A	5,525,074	3,180,060	Horizon year projections Source: PSRC Macroeconomic Forecast
	C	2019-2044 Projection	A - B	1,321,674	884,452	Regional projection for the planning period
Countywide	D	Regional Growth Strategy Share of King County Growth	N/A	50%	59%	Source: PSRC VISION 2050 Regional Growth Strategy for King County
	E	2019-2044 Initial Countywide Growth	C * D	660,837	520,756	Regional Growth Strategy shares are applied to regional projection to create King County projection
	F	Share of Construction/Resource jobs	N/A	N/A	5.7%	Construction/Resource employment are removed from total as jobs generally do not have fixed worksites PSRC Total Employment Estimates
	G	2019-2044 Countywide Growth	E * (1-F)	660,837	490,854	Countywide population projection

186
 187 VISION 2050’s Regional Growth Strategy apportions 50 percent of the region’s population growth and 59
 188 percent of the region’s employment growth to King County. For comparison, in 2020, King County housed
 189 53 percent of the region’s population and 67 percent of the region’s jobs.¹⁰ The Regional Growth Strategy
 190 shares reflect King County’s role within the region and includes policy choices aimed at improving the
 191 regional balance of jobs and housing among the four PSRC counties. The Regional Growth Strategy
 192 disperses employment growth traditionally concentrated in King County but retains a similar share of
 193 population growth.
 194

195 Finally, before sub-county allocations are made, the countywide employment growth number is adjusted to
 196 remove construction and resource sector employment. While the contributions from these sectors are
 197 essential to King County’s economy, construction and resource jobs are less likely to have a fixed worksite,
 198 e.g., an office or storefront, and resource sector jobs are generally less urban. These jobs are removed from
 199 the countywide allocation.

200 **2. Allocation of Population, Housing, and Job Growth within King County**

201 With the countywide population and employment growth allocations established, the next step is to allocate
 202 population, housing, and jobs to jurisdictions within King County. Growth is allocated to VISION 2050
 203 Regional Geographies before being allocated to individual jurisdictions. Regional Geographies are groups
 204 of cities and urban unincorporated areas that have similar characteristics, such as designated regional
 205 growth centers or high-capacity transit infrastructure.¹¹
 206

207 The policy goals of VISION 2050 and the 2021 Countywide Planning Policies define how growth is allocated
 208 to Regional Geographies. Metropolitan and Core Cities have regional growth centers and existing or
 209 planned high-capacity transit investments, and collectively are planned to accommodate the greatest share
 210 of projected growth. High Capacity Transit Communities are cities and urban unincorporated areas with
 211 planned high-capacity transit investments that will allow these jurisdictions to accommodate a larger share

¹⁰ US Census Bureau, Decennial Census 2020; Puget Sound Regional Council, Covered Employment Estimates, 2020 [\[LINK\]](#)

¹¹ Puget Sound Regional Council, VISION 2050 Regional Growth Strategy [\[LINK\]](#)

212 of future growth.¹² Cities and Towns and the Urban Unincorporated areas accommodate the least amount of
 213 projected growth as they lack high-capacity transit and growth centers or are surrounded by the Rural Area.
 214 Rural King County is included in the countywide distribution but does not receive a growth target. Figure 3:
 215 Share of Growth by Regional Geography Figure 3 lists the six Regional Geography categories and their
 216 associated growth shares from VISION 2050 that were used to sub-allocate the countywide growth
 217 allocations.
 218

219 **Figure 3: Share of Growth by Regional Geography**

Regional Geography	Share of Countywide Population	Share of Countywide Employment
Metropolitan Cities	44%	46%
Core Cities	40%	45%
High Capacity Transit Communities	11%	6%
Cities and Towns	5%	3%
Urban Unincorporated	0.5%	0.1%
Rural	0.7%	0.4%

220 *The shares in Figure 3 were applied to the 2019-2044 countywide growth from Figure 2 to create Regional Geography level*
 221 *population and employment growth. Population was then converted to housing units to support the development of housing*
 222 *targets. The conversion used household assumptions (share of group quarters population, household size, and vacancy rates)*
 223 *created for each regional geography from jurisdiction-level 2018 American Community Survey and OFM population estimates,*
 224 *averaged to regional geography, and then adjusted to reflect forecasted trends in reduced household size and longer-term*
 225 *vacancy rates.*
 226

227 Figure 4 shows the housing, employment, and population initially allocated to Regional Geographies.
 228

229 **Figure 4: Allocated Growth by Regional Geography**

Regional Geography	2019-2044 Population Growth	2019-2044 Housing Growth	2019-2044 Employment Growth
Metropolitan Cities	288,407	134,500	223,508
Core Cities	261,912	112,859	222,789
High Capacity Transit Communities	69,641	29,933	28,747
Cities and Towns	33,307	13,985	12,936
Urban Unincorporated	3,028	1,292	719
Rural	4,542	4,211	2,156
Urban King County Subtotal	656,295	292,569	488,698
King County Total	660,837	296,780	490,854

230

231 **3. Allocation of Projected Growth to Cities and Urban Unincorporated King County**

232 The final phase of the growth target setting process allocated growth to cities and potential annexation
 233 areas in urban unincorporated King County. This was a two-step process. First, Regional Geography
 234 allocations were apportioned into an initial range of growth target scenarios for individual cities and PAAs.

¹² In King County, the High Capacity Transit Communities regional geography includes the Potential Annexation Areas (PAAs) for Federal Way, Renton, and Seattle (North Highline). These areas were selected because a portion of each PAA falls within a ½-mile of a future light rail station or contains an existing or planned bus rapid transit stop.

235 Each scenario within the range is based on a proportional allocation of Regional Geography growth to cities
236 and potential annexation areas based on relevant data, including existing capacity from the Urban Growth
237 Capacity Report, existing development and recent growth, the number of regional growth centers, and
238 number of transit station areas.
239

240 The initial growth target ranges provided the foundation for the second step of this stage of the process,
241 where planning staff representing the 39 cities and unincorporated King County were convened by their
242 VISION 2050 Regional Geography to negotiate the set of draft growth targets. Each Regional Geography
243 group met approximately five times. Groups discussed the preliminary target ranges created in the previous
244 step, weighing the merits and relevancy of capacity, existing development, transit and transportation
245 connections, growth rates, and other supplied data to allocate growth targets within their Regional
246 Geography. Groups worked iteratively, collectively identifying a baseline set of housing and employment
247 targets from the preliminary target ranges as a starting place for negotiation, and then individually working
248 with other jurisdictional staff and elected officials to develop a jurisdictional position on the baseline. King
249 County staff then assembled the individual positions from jurisdictions and convened the Regional
250 Geography groups again to collectively review and attempt to close any gap between the individual growth
251 target positions and the Regional Geography growth allocation.
252

253 The ultimate result of this process are the growth targets adopted by the King County Council and ratified
254 by the cities in the 2021 King County Countywide Planning Policies.¹³ Figure 5 displays the adopted housing
255 and employment growth targets for 2019-2044.
256

257 **Figure 5: King County Jurisdiction Growth Targets 2019-2044**

		Net New Units and Jobs	
		2019-2044 Housing Target	2019-2044 Jobs Target
Metro Cities	Jurisdiction		
	Bellevue	35,000	70,000
	Seattle	112,000	169,500
Metropolitan Cities Subtotal		147,000	239,500
Core Cities	Auburn	12,000	19,520
	Bothell	5,800	9,500
	Burien	7,500	4,770
	Federal Way	11,260	20,460
	Issaquah	3,500	7,950
	Kent	10,200	32,000
	Kirkland	13,200	26,490
	Redmond	20,000	24,000
	Renton	17,000	31,780
	SeaTac	5,900	14,810
	Tukwila	6,500	15,890
Core Cities Subtotal		112,860	207,170
High Capacity Transit Communities	Des Moines	3,800	2,380
	Federal Way PAA*	1,020	720
	Kenmore	3,070	3,200
	Lake Forest Park	870	550

¹³ GMPC Motion 21-1 initially adopted by Ordinance 19384 [\[LINK\]](#), and amended in 2022 by GMPC Motion 22-1 adopted by Ordinance 19553 [\[LINK\]](#)

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Appendix D1 - Growth Targets and the Urban Growth Area
Attachment G to PO 2023-0440**

		Net New Units and Jobs	
		2019-2044 Housing Target	2019-2044 Jobs Target
	Jurisdiction		
	Mercer Island	1,239	1,300
	Newcastle	1,480	500
	North Highline PAA*	1,420	1,220
	Renton PAA* - East Renton	170	0
	Renton PAA* - Fairwood	840	100
	Renton PAA* - Skyway/West Hill	670	600
	Shoreline	13,330	10,000
Woodinville	2,033	5,000	
High Capacity Transit Communities Subtotal		29,942	25,570
Cities and Towns	Algona	170	325
	Beaux Arts	1	0
	Black Diamond	2,900	680
	Carnation	799	450
	Clyde Hill	10	10
	Covington	4,310	4,496
	Duvall	890	990
	Enumclaw	1,057	989
	Hunts Point	1	0
	Maple Valley	1,720	1,570
	Medina	19	0
	Milton	50	900
	Normandy Park	153	35
	North Bend	1,748	2,218
	Pacific	135	75
	Sammamish	2,100	728
	Skykomish	10	0
	Snoqualmie	1,500	4,425
Yarrow Point	10	0	
Cities and Towns Subtotal		17,583	17,891
Urban Unincorporated	Auburn PAA*	12	0
	Bellevue PAA*	17	0
	Black Diamond PAA*	328	0
	Issaquah PAA*	35	0
	Kent PAA*	3	300
	Newcastle PAA*	1	0
	Pacific PAA*	134	0
	Redmond PAA*	120	0
	Sammamish PAA*	194	0
	Unaffiliated Urban Unincorporated	448	400
Urban Unincorporated Subtotal		1,292	700

Jurisdiction	Net New Units and Jobs	
	2019-2044 Housing Target	2019-2044 Jobs Target
Urban Growth Area Total	308,677	490,831

258 **4. 2019-2044 Urban Unincorporated Growth Targets**

259 As shown in Figure 5, growth targets for urban unincorporated King County are divided across two Regional
 260 Geographies. Growth targets for the Federal Way PAA, North Highline, and Renton PAA are in the High
 261 Capacity Transit Communities Regional Geography, reflecting the planned transit investments in these
 262 areas.¹⁴ Targets for other PAAs and unaffiliated urban areas are included in the Urban Unincorporated
 263 Regional Geography. Per the Countywide Planning Policies, growth targets were allocated to PAAs in the
 264 Urban Unincorporated Regional Geography proportionately based on their relative capacity.¹⁵ Growth
 265 targets for the PAAs in the High Capacity Transit Communities geography were also allocated relative to
 266 their existing capacity to be consistent with the intent of the Countywide Planning Policies, but not directly
 267 proportional to the capacity of urban unincorporated King County given the other jurisdictions in the group.

268 **B. Land Capacity in the UGA**

269 **1. Countywide**

270 The GMA requires King County and the cities in King County to include land area and densities sufficient to
 271 accommodate projected growth over the 20-year planning period within the UGA.¹⁶ Through the review
 272 and evaluation program, King County ensures that sufficient urban capacity for growth persists during the
 273 planning period and beyond, ensuring a stable UGA boundary. In 2021, King County completed the Urban
 274 Growth Capacity Report, its fourth edition of the required evaluation.¹⁷ King County’s previous reports have
 275 consistently reported sufficient capacity within the UGA for projected growth.

276 The Urban Growth Capacity Report assesses patterns of development within the UGA and uses assumptions
 277 to estimate a more “market-based” capacity for growth, to test whether capacity is realistically available for
 278 future development.¹⁸ Available land supply is identified by its likeliness to re-develop. Densities used to
 279 calculate capacity are informed by recent development in a zone, rather than the base or maximum
 280 densities expressed in zoning. A “market factor” is applied to the calculated capacity to discount capacity
 281 unlikely to develop during the planning period. Therefore, capacity calculated under the Urban Growth
 282 Capacity Report is generally a more conservative estimate than the total amount allowed by zoning.

283 The Urban Growth Capacity Report found that King County had capacity for over 400,000 housing units and
 284 600,000 jobs within the UGA.¹⁹ This was ample capacity to accommodate the remaining projected growth
 285 from the previous, 2006-2035 growth targets, and sufficient to accommodate the projected growth under
 286 the 2019-2044 growth targets, as reported in Figure 5.

287 Amendments to the GMA in 2017 ushered in new requirements for the review and evaluation program.²⁰
 288 The amendments formalized how assumptions about infrastructure gaps and market factors should be
 289 considered and expanded the purview for when “reasonable measures” would be required to correct for
 290 measured inconsistencies to include the achievement of growth targets and urban densities. The Urban
 291
 292
 293

¹⁴ The Puget Sound Regional Council assigned the entirety of an affiliated PAA to its VISION 2050 Regional Geographies. While Fairwood and East Renton do not have planned high-capacity transit investments during this planning period, they are in the High Capacity Transit Communities geography because the Renton PAA was assigned to it.

¹⁵ 2021 King County Countywide Planning Policy DP-12g [\[LINK\]](#)

¹⁶ RCW 36.70A.110 [\[LINK\]](#)

¹⁷ King County, 2021 King County Urban Growth Capacity Report, ratified 2022 [\[LINK\]](#)

¹⁸ Patterns of development analysis required by RCW 36.70A.130 [\[LINK\]](#)

¹⁹ King County, 2021 King County Urban Growth Capacity Report, ratified 2022 [\[LINK\]](#)

²⁰ Engrossed Second Substitute Senate Bill 5254, 2017 [\[LINK\]](#)

294 Growth Capacity Report reported on these additional indicators, as a part of its assessment of the patterns
295 of development with the UGA.

296
297 The Urban Growth Capacity Report analyzed progress made by cities and urban unincorporated King
298 County towards achieving 2006-2035 growth targets. Because past reports had not focused on this specific
299 outcome before, the 2021 report examined growth since 2006 and through 2018. Over this period, urban
300 King County grew at a rate to achieve its adopted growth targets. Approximately 41 percent of the previous
301 target period had elapsed between 2006-2018. Urban King County achieved 47 percent of its housing and
302 employment targets during the period, growing slightly faster than this prorated pace.

303
304 Countywide, development trends analyzed under the Urban Growth Capacity Report showed that urban
305 densities were being achieved within the UGA. While there is not a stated definition of “urban” growth
306 stated as a density goal, 70 percent of residential development during the period analyzed by the report
307 was developed at densities of at least 48 dwelling units per acre, and about 17 percent of development
308 occurred at densities less than 10 dwelling units per acre. 98 percent of residential development was over
309 four dwelling units per acre.

310
311 While the Urban Growth Capacity Report found that sufficient capacity was available in the UGA for
312 projected growth, that urban densities were being achieved, and that urban King County was on track to
313 achieve its 2006-2035 growth targets, a small number of cities lacked sufficient capacity for projected
314 growth or were not growing at a rate to achieve their targets. The Urban Growth Capacity Report noted the
315 cities where inconsistencies were identified and recommended that the cities evaluate whether reasonable
316 measures were required to be taken in the 2024 periodic update to comprehensive plans to correct for the
317 inconsistency.

318
319
320 Figure 6 lists these cities and the observed inconsistencies. Some inconsistencies may have been corrected
321 by adopting revised growth targets for the 2019-2044 planning period. The observed inconsistency for the
322 City of Sammamish related to an infrastructure deficiency that has since been resolved. Following the
323 adoption of comprehensive plans in 2024, each jurisdiction will be required to monitor progress toward
324 resolving the inconsistency, with regular reporting to the Growth Management Planning Council.

325

326 **Figure 6: Recommendations for Adoption of Reasonable**
327 **Measures from the 2021 Urban Growth Capacity Report**

Jurisdiction	Inconsistency Identified
Burien	<ul style="list-style-type: none"> Insufficient employment capacity Employment growth inconsistent with target
Pacific	<ul style="list-style-type: none"> Insufficient employment capacity
Sammamish	<ul style="list-style-type: none"> Insufficient housing capacity
Shoreline	<ul style="list-style-type: none"> Insufficient employment capacity
Tukwila	<ul style="list-style-type: none"> Housing growth inconsistent with target Employment growth inconsistent with target

328 **2. Unincorporated King County**

329 The Urban Growth Capacity report found sufficient capacity for the remaining portion of the previous
330 housing growth targets, with a shortfall of capacity for the remaining employment target. The evaluation
331 revealed capacity for 7,383 housing units and 2,207 jobs, with 7,339 housing units and 4,343 jobs remaining
332 of the previous period’s 2006-2035 growth targets. The 2006-2035 urban unincorporated employment
333 targets included a target of over 4,000 jobs for the Bear Creek Urban Planned Development, a fully

334 contained community surrounded by the rural area. The target was a reflection of estimates of commercial
335 space planned for the community. As the development built out in Bear Creek in the last decade, the
336 community added 1,100 jobs between 2006 and 2020, approximately a quarter of the anticipated growth
337 there.²¹ Because of the nature of the development in a fully contained community constrained by developer
338 agreements and subdivision controls, additional growth is not expected to reach the originally targeted
339 level. The 2019-2044 growth targets reflect reduced expectations for employment growth in the urban
340 unincorporated area, more in line with the land supply and capacity for employment growth, to remedy the
341 apparent capacity shortfall.

342
343 For the 2019-2044 planning period, King County is planning for a total of 5,412 housing units and 3,340
344 jobs in the urban unincorporated area. The land capacity analysis performed to support the development of
345 the 2024 update to the Comprehensive Plan found capacity for 29,600 housing units and 62,900 jobs under
346 current zoning at base densities.

347
348 Zoned capacity is higher than the capacity calculated in the Urban Growth Capacity Report, particularly for
349 employment. This reflects the differences seen in recent development, which strongly influenced the
350 capacity calculated in the Urban Growth Capacity Report, and what is allowed under the zoning code. The
351 significant difference in non-residential capacity also owes to the imprecision in estimating a job-based
352 capacity, as the quantity of employees varies across businesses and workplace types and is not directly
353 controlled by the zoning code or land use designations.

354

355 IV. Conclusion

356
357 The UGA is sized appropriately to accommodate the projected growth in housing and employment over the
358 2019-2044 planning period. As demonstrated in the 2021 King County Urban Growth Capacity Report,
359 patterns of development within the UGA have been urban in nature and growth has been occurring at a rate
360 to achieve growth targets. Urban unincorporated King County has sufficient capacity under the current
361 zoning to accommodate its growth targets for the 2019-2044 period.

²¹ Puget Sound Regional Council, Covered Employment Estimates, 2020 [\[LINK\]](#)