

Housing Policy Review

City of Othello | November 2020

Introduction and Purpose

Because of smaller population and lower growth rates,¹ Adams County and the cities within – including Othello – do not plan fully under the Growth Management Act (GMA), but are required only to designate and protect critical areas and identify and conserve resource lands. Othello plans under other planning enabling laws that generally require only land use and circulation elements of a comprehensive plan. The land use element must address uses of land for housing as well as other categories of land uses. In addition to the Land Use and Transportation elements, Othello's 2015 Comprehensive Plan incorporates several optional elements, including Housing, Capital Facilities & Utilities, Economic Development, Parks & Recreation, and Conservation & Environment. Partially planning communities like Othello must also meet other statewide requirements to ensure fair housing and to allow manufactured housing, accessory dwelling units (for cities above 20,000 residents), affordable housing on religious organization properties, and other items.

Evaluation Approach

This Policy Review evaluates relevant sections of the City's 2015 Comprehensive Plan and land use regulations in terms of their effectiveness in meeting the city's housing goals, attaining the planned housing types and units, or the likelihood they will support the development of housing to meet the needs identified in the Housing Needs Assessment. Unmet housing needs include:

- Home ownership is unaffordable for many households and supply is limited.
- Rental housing costs are rising and options are limited for low and moderate income households.
- There is a lack of diversity in the housing options available to local households and a misalignment between the size of housing units and the size of households.
- Affordable and sufficiently large enough housing options for families with children are limited.
- There is a lack of permanent and seasonal housing for farmworkers – especially for those in low-income households – despite Othello being a service/retail, manufacturing, and agriculture based economy.

Housing plans, policies, and processes (including existing development regulations and permitting processes related to housing development) are further reviewed in relation to state requirements for partially planning communities to ensure fair housing and to allow manufactured housing, accessory dwelling units, affordable housing on religious organization properties, and other items.²

This Policy Review helps inform potential strategies in the future Housing Action Plan. It does not, however, update nor provide alternative policy language for the City of Othello. Goals and policies will be updated as part of the City's comprehensive planning process.

¹ RCW 36.70A.040.

² See the Statewide Housing Requirements section below for specific requirements and RCW regulations.

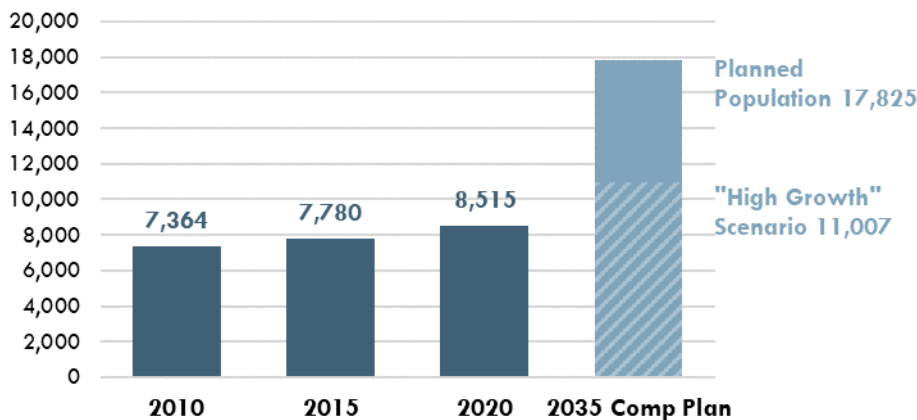
Othello Comprehensive Plan

Per the 2015 Comprehensive Plan, the City is “committed to planning its future in a way that provides a steady economy that is attractive to new industries, a cooperative and responsible government organization that supports opportunities for new growth, and a community that provides a great quality of life for its citizens.” The Comprehensive Plan does not include a defined vision for 2035. However, the goals and policies throughout the plan guide City permitting, planning, funding, and other decisions.

Comprehensive Plan Growth Evaluation

Othello is the largest city in Adams County and makes up 42% of the countywide population of 20,450 – Othello's permanent city population in 2020 is 8,515 according to the Office of Financial Management (OFM). Since 2010, the city has added 1,151 residents, and since the adoption of the 2015 Comprehensive Plan, the city has added 735 residents (Exhibit 1). The City has planned for a 2035 population of 17,825 in its Comprehensive Plan, including an estimated 3,000 current county residents who may potentially request annexation or who are living on land that will likely be annexed into the City by 2035.³ Seven annexations have occurred since 2008, none of which included new population or housing. In the last 5 years the city has grown by an average of 147 new residents a year, a greater annual amount compared to 2010-2015 at 83 persons per year. To reach the Comprehensive Plan's 2035 planned population, the city would need to grow by about 621 persons per year over the next 15 years (about 421 persons per year outside of annexation; Exhibit 2). This seems unlikely given recent growth trends. A more likely outcome is the “High Growth” scenario based on statewide OFM growth rates which projects the city will grow to a population of 11,007 people by 2035. Under this scenario, the city would grow by about 166 persons per year over the next 15 years assuming no annexations occur.

Exhibit 1. Population Change, 2010-2035



Note: The City's adopted 2035 target assumes about 3,000 people are added through annexation over the next 15 years. Source: City of Othello, 2015; OFM, 2020; BERK, 2020.

³ This number differs significantly from population projections for Othello based on OFM Forecasting Division's 2035 statewide high (1.75%), medium (1.21%), and low (0.5%) growth rates. The Comprehensive Plan applied these rates to Othello's 2015 population estimate of 7,780 resulting in a 2035 population estimate of 11,007 under high growth, 9,896 under medium growth, and 8,596 under low growth. Out of concern that these numbers did not reflect the true potential for the city, the Comprehensive Plan relied on historical population trends combined with building activity data to provide a hybrid number that reflected a more substantial population number for planning purposes. See pages 9-11 and Table I-2 in the 2015 Comprehensive Plan. Both the planned population and “High Growth” scenarios from the Comprehensive Plan are considered in this analysis.

Exhibit 2. Progress on Planned Population vs. “High Growth” Scenario in the Comprehensive Plan

	2010-2015	2015-2020	Comprehensive Plan 2020-2035*	“High Growth” Scenario 2020-2035
New Population	416	735	9,310	2,492
Annual Average	83	147	621 (no annexation occurs) 421 (3,000 added through annexation)	166 (no annexation occurs)

*The City’s planned 2035 population assumes 3,000 people of the remaining 9,310 are added through annexation.
Source: City of Othello, 2015; OFM, 2020; BERK, 2020.

According to OFM, the average household size in Othello was 3.45 in 2019. Applying a household size of 3.45 to the remaining “High Growth” population projection (2,492) and assuming a vacancy rate of 5%, about 760 new dwelling units would be needed between 2020 and 2035. Alternatively, to reach the Comprehensive Plan total population (9,310), about 2,841 new dwelling units would be needed between 2020 and 2035; about 1,925 dwelling units would be needed if applying this household size and vacancy rate to the remaining population outside of annexation (Exhibit 4).

However, overcrowding is a significant issue in Othello where it is quite common for multiple related families or a group of farm workers to share a house to make it more affordable. About 17% of occupied housing units in the city have more than one occupant per room compared to 13% in Adams County and 3% statewide – this is even more of a concern amongst renter households where nearly one-third of Othello’s renter households (31%) have more than one occupant per room compared to 23% in Adams County and 6% statewide (Exhibit 3).⁴

Exhibit 3. Occupied Housing Units with More than One Occupant Per Room, 2018

More than 1 Occupant/Room	Othello	Adams County	Washington State
All Households	17%	13%	3%
Owner-occupied	8%	7%	2%
Renter-occupied	31%	23%	6%

Source: U.S. Census Bureau, 2014-2018 ACS 5-Year Estimates (Table B25014); BERK, 2020.

Under the “High Growth scenario, 805 dwelling units would be needed by 2035 if applying the average household size for Adams County (3.26), while 1,029 dwelling units would be needed if applying the statewide average household size of 2.55. To accommodate planned 2035 population from the Comprehensive Plan, between 3,006 and 3,843 dwelling units would be needed assuming no annexation occurs, and between 2,037 and 2,605 dwelling units would be needed if 3,000 residents are added through annexation based on the average household size for Adams County or the state, respectively (Exhibit 4). Each of these estimates assumes a healthy 5% vacancy rate.

⁴ Persons per room (PPR) is calculated by dividing the number of people living in a housing unit by the number of rooms in a housing unit. Rooms must “be separated by built-in archways or walls that extend out at least 6 inches and go from floor to ceiling” and include bedrooms, kitchens, living rooms, and offices. Rooms do not include bathrooms, foyers, halls, or unfinished basements. Per HUD, a housing unit is considered overcrowded if it has a PPR of greater than 1.0. Above this threshold, the risk for certain health complications, mental health symptoms, accidents, and other negative outcomes increases. (U.S. HUD. 2007. *Measuring Overcrowding in Housing*. Office of Policy Development and Research. https://www.huduser.gov/publications/pdf/Measuring_Overcrowding_in_Hsg.pdf)

Exhibit 4. New Dwelling Units Needed Between 2020 and 2035 to Reach Comprehensive Plan Planned Population vs. “High Growth” Population

Growth Scenario	New Population Needing Housing	New Dwelling Units Needed		
		Household Size: 3.45 (Othello)	Household Size: 3.26 (Adams County)	Household Size: 2.55 (State)
Comprehensive Plan Scenario (2035 population of 17,825)				
No Annexation Occurs	9,310	2,841	3,006	3,843
3,000 Residents Added Through Annexation	6,310	1,925	2,037	2,605
“High Growth” Scenario (2035 population of 11,007)				
No Annexation Occurs	2,492	760	805	1,029

Note: The City's adopted 2035 target assumes 3,000 people of the remaining 9,310 are added through annexation. New dwelling units needed assumes a healthy vacancy rate of 5%.
 Source: City of Othello, 2015; US Census Bureau, 2014-2018 ACS 5-Year Estimates (Table B25014); BERK, 2020.

Based on the land capacity analysis in the 2015 Comprehensive Plan, vacant residential land within the city could accommodate an additional 2,344 units if developed at the highest density, 633 units if developed at the lowest density, and 601 units if developed at the 2015 rate of density.⁵ An additional 234 housing units have been built in the city since 2015,⁶ resulting in remaining capacity on residential land for approximately 2,110 units if developed at the highest density, 399 units if developed at the lowest density, and 370 units if developed at the 2015 rate of density (Exhibit 5). According to City staff, much of the residential development that's occurred since 2015 has been at lower rates of density than the maximum densities allowed.

Exhibit 5. Vacant Residential Land Capacity, 2015 and 2020

	2015 Comprehensive Plan	2020 Current Conditions
Housing Units	2,354*	2,588
Density of Development (du/ac)	Capacity	Remaining Capacity
High	2,344	2,110
Low	633	399
2015 Existing Rate	601	370

*Note: The 2015 Comprehensive Plan land capacity analysis reports 2,354 housing units in 2015, which is slightly higher than the 2015 OFM estimate of 2,323 units. For purposes of this analysis, the 2020 OFM estimate of 2,588 housing units is compared to the City's 2015 estimate of 2,354 to estimate remaining capacity on residential land.
 Source: City of Othello Comprehensive Plan, 2015; OFM, 2020; BERK, 2020.

⁵ See Figure 2-9 in the 2015 Comprehensive Plan.

⁶ The 2015 Comprehensive Plan land capacity analysis reports 2,354 housing units in 2015, which is slightly higher than the 2015 OFM estimate of 2,323 units. For purposes of this analysis, the 2020 OFM estimate of 2,588 housing units is compared to the City's 2015 estimate of 2,354 to estimate remaining capacity on residential land.

This result is similar to an analysis of remaining vacant residential land and the current zoning code. In early 2020, the City adopted a new zoning code and map which adjusted minimum lot sizes for most residential zones, added new provisions for multi-family and/or mixed use development in commercial zones, and upzoned several undeveloped residential parcels (primarily in the north near E Olympia St and N 2nd Ave). Zoning in existing developed neighborhoods was unchanged as part of the 2020 update.⁷ Exhibit 6 compares the minimum lot size and maximum density for residential zones as listed in the 2015 Comprehensive Plan land capacity analysis to the 2020 updated zoning code. Allowed zoning densities in most residential areas of the city currently range between 3.8 and 17.4 dwelling units per acre, while residential densities in commercial districts are effectively limited by height, parking requirements, and other development standards (see Development Regulations below).

Exhibit 6. 2015 Comprehensive Plan Residential Zoning Densities vs. 2020 Residential Zoning Densities

Zone	2015 Comprehensive Plan			2020 Zoning Code Changes		
	Min. Lot Size (Ft ²)	Allowed Unit Types	Maximum Density (Units/Acre) ¹	Min. Lot Size (Ft ²)	Allowed Unit Types	Maximum Density (Units/Acre) ¹
R-1	7,200	Single Family	4.13	8,000	Single Family	3.8
R-2	7,200	Single Family	4.13	7,000	Single Family	4.4
	3,500 ²	Duplex	8.5		Duplex	8.7
R-3	7,200	Single Family	4.13	7,000	Single Family	4.4
		Duplex			Duplex	8.7
		Tri-Plex/Four-Plex			Tri-Plex/Four-Plex	17.4
R-4	6,000	Single Family	4.96	6,000	Single Family	5.1
	3,000	Duplex	9.92		Duplex	10.2
	1,200 ³	Tri-Plex/Four-Plex	24.82		Tri-Plex/Four-Plex ⁴	13.3
		Multi-family			Multi-family	Dependent on lot size
R-M	Not analyzed in the Comprehensive Plan land capacity analysis			7,000	Single Family	4.4
S-1	Not analyzed in the Comprehensive Plan land capacity analysis			43,560	Single Family	1

1 The City's 2015 Comprehensive Plan land capacity analysis assumed 30% for right-of-way and public improvements and does not list densities for every allowed unit type within each zone. A 30% reduction was applied to the updated zoning for consistency.

2 Minimum required lot size of 3,500 ft² per unit (7,000 ft² overall).

3 Minimum required lot size of 1,200 ft² per unit plus parking area.

4 For residences with more than 2 dwelling units in the R-4 zone, the zoning code requires an additional 900 ft² of site area, 300 ft² of landscaping, and 400 ft² of parking per dwelling unit above the minimum lot size of 6,000 ft². This requires at least 7,600 ft² to accommodate a tri-plex and 9,200 ft² to accommodate a four-plex, resulting in a maximum density of 12.0 or 13.3 dwelling units per acre respectively (assuming a 30% reduction for right-of-way and public improvements).

Source: City of Othello Comprehensive Plan, 2015; City of Othello Ordinance 1547, 2020; BERK, 2020.

According to City staff, approximately 158 acres of residential land within city limits is currently vacant – 40 acres south of E Cemetery St, a 70 acre parcel north of E Olympia St, another 20 acres north of E Olympia St, 26 acres west of N 2nd Ave, and 2 acres at E Olympia St and N 2nd Ave.⁸ The 70 acre parcel north of E Olympia St has a preliminary, non-binding concept plan for single family lots of 7,000-10,000 ft² each, or about 250 single family homes assuming a 30% reduction for right-of-way and public improvements. Nearly all of the remaining 88 vacant acres are zoned R-4 (a small portion of the 20

⁷ City of Othello, 2020.

⁸ About 20 of the 26 acres west of N 2nd Ave were rezoned from commercial (C-2) to residential (R-4) as part of the 2020 zoning code update.

acres north of E Olympia St is zoned R-3 to the west of N 4th Ave). Based on current R-4 zoning, these 88 acres have capacity for about 1,167 dwelling units if developed as four-plexes (13.3 dwelling units per acre), 894 dwelling units if developed as duplexes (10.2 dwelling units per acre), or 447 single family homes developed at 5.1 dwelling units per acre (Exhibit 7).⁹

However, a 2015 sample of residential development demonstrated that even with a range of density options, the city was developing at a flat rate of density ranging between approximately 3.5 and 6.7 dwelling units per acre, with the greatest density in the R-3 zone and densities of about 3.5 dwelling units per acre in the R-4 zone.¹⁰ **There is remaining capacity for 311 units on the 88 acres of vacant residential land if developed at the 2015 rate of density (Exhibit 7), or about 561 units when combined with the 250 single family homes planned for the 70 acre parcel.**

Exhibit 7. Land Capacity of Remaining Vacant Residential Land in City Limits (~88 Acres), 2020

Type of Development	Maximum Density of Development	Remaining Capacity
2015 Rate	3.5 du/ac	311
Single Family	5.1 du/ac	447
Duplex	10.2 du/ac	894
Four-plex	13.3 du/ac	1,167

Note: Listed capacity Does not include the 70 acres of vacant residential land north of E Olympia St that has a preliminary site design for approximately 213-305 single family homes. Maximum single family, duplex, and four-plex densities account for a 30% reduction for right-of-way and public improvements consistent with Exhibit 6 and the 2015 Comprehensive Plan land capacity analysis.

Source: City of Othello, 2020; BERK, 2020.

Permit data shows the city issued between 256-283 permits from 2015 to 2019, or an average of 51-57 permits per year.¹¹ Most of these were single family permits (between 179-190), indicating that permitted development since 2015 has continued existing development patterns.¹² City permit records vary slightly from OFM and OFM data appears to lag the City data by one year, but the patterns are similar (Exhibit 8 and Exhibit 9). Both data sources show a steady number of new permits for single-family units each year (an annual average of 34 in the City data and 33 in the OFM data). Both OFM and City data show a very limited number of new permitted units in duplexes and multi-family units with the exception of 2015/16.

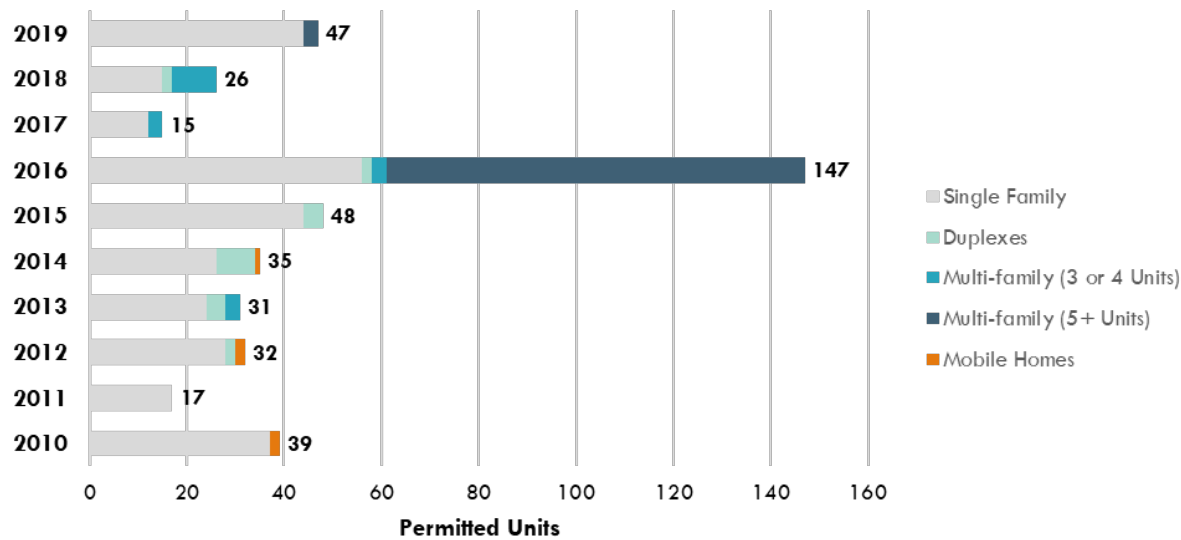
⁹ These densities account for a 30% reduction for right-of-way and public improvements consistent with Exhibit 6.

¹⁰ See Figure 2-7 in the 2015 Comprehensive Plan.

¹¹ City permit records vary slightly from OFM and OFM data appears to lag the City data by one year, but the patterns are similar (Exhibit 27). According to City records, 256 permits were issued from 2015 to 2019 compared to the 283 units reported by OFM. OFM, 2019; City of Othello, 2020.

¹² Note that the number of issued permits will not necessarily match the number of new housing units built as only one permit is issued for multi-family development (e.g., a triplex would require one building permit but add three dwelling units). According to OFM, the city added 266 new housing units or an average of 53 units per year between 2015 and 2020.

Exhibit 8. Permitted Units in the City of Othello, 2010-2019



Source: OFM, 2019; BERK, 2020.

Exhibit 9. Permitted Units, OFM vs. City of Othello Data, 2010-2019

Year	OFM				City of Othello			
	Single Family	Duplexes	Multi-family	Total Permitted Units	Single Family	Duplexes	Multi-family	Total Permitted Units
2010	39	0	0	39	Not Available			
2011	17	0	0	17	Not Available			
2012	32	2	0	32	20	0	3	23
2013	28	4	3	31	24	12	0	36
2014	35	8	0	35	35	4	0	39
2015	48	4	0	48	71	0	50	121
2016	58	2	89	147	22	0	3	25
2017	12	0	3	15	17	2	6	25
2018	17	2	9	26	35	0	3	38
2019	44	0	3	47	45	2	0	47

Sources: City of Othello, 2020; OFM, 2019; BERK, 2020.

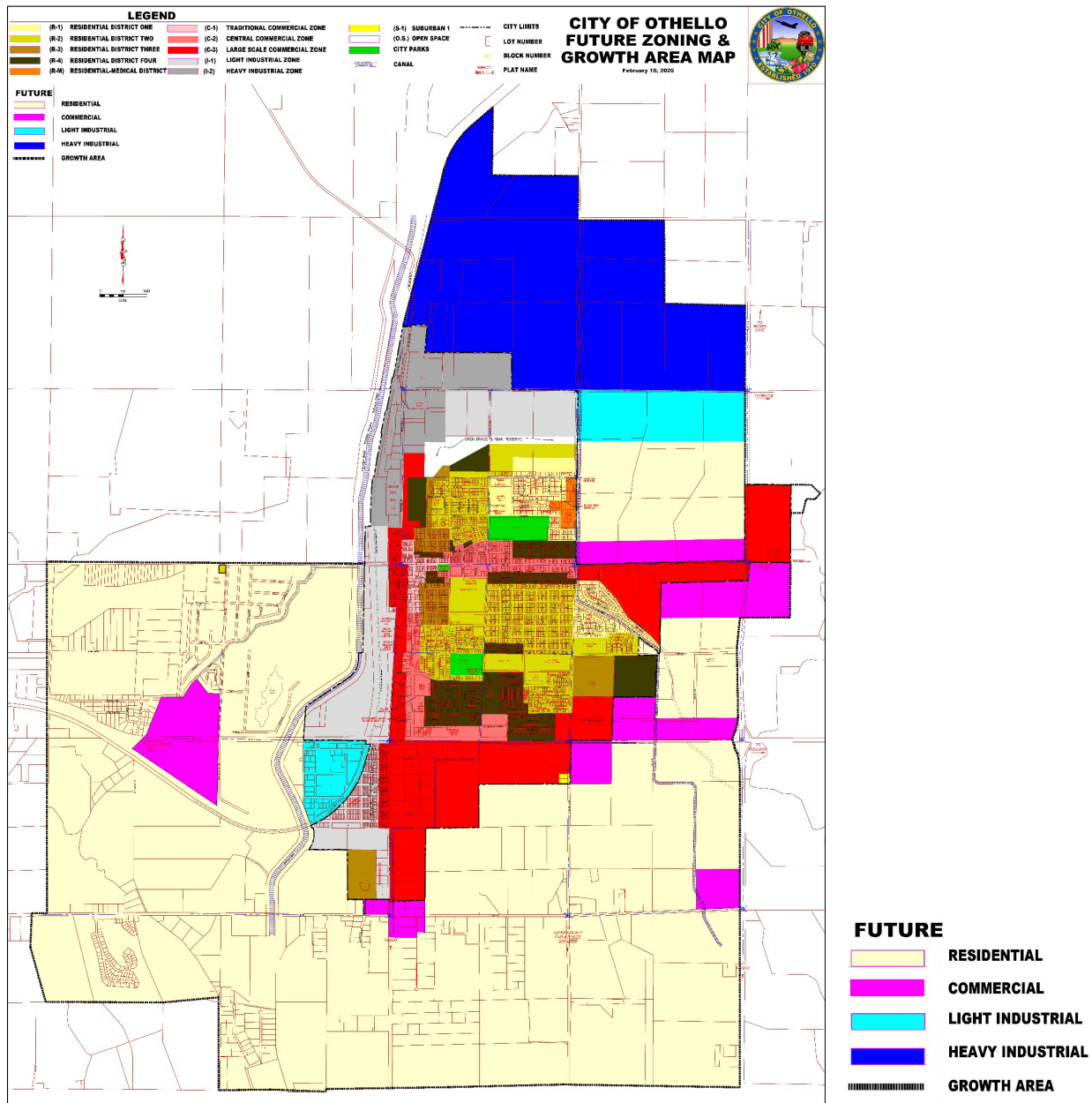
Given the slightly higher densities, upzones in undeveloped areas, and updates to allow multi-family or mixed-use development in most commercial areas, existing residential capacity in the city may be slightly greater than the estimates listed in Exhibit 5 or Exhibit 7. In particular, several large vacant commercial areas in the southern and eastern portions of the city zoned C-3 now allow mixed-use development opportunities.

Othello Growth Area

The City's 2015 Comprehensive Plan identifies the "Othello Growth Area" (OGA), which includes identified commercial, industrial, and residential lands currently outside city boundaries, but which the City believes may either request annexation or be annexed into the city between 2015 and 2035 (Exhibit 10). The Comprehensive Plan estimated that roughly 3,000 individuals lived in the OGA in 2015.¹³

¹³ City of Othello. 2015. *Comprehensive Plan*. <https://evogov.s3.amazonaws.com/media/49/media/37803.pdf>

Exhibit 10. City of Othello Future Zoning and Growth Area, 2020



Note: The Othello Growth Area is not a designated Urban Growth Area as Adams County and the cities within do not plan fully under the Growth Management Act.

Source: City of Othello, 2020.

Land Use Policy 1.5.2 in the Comprehensive Plans states that:

Annexation areas will automatically be zoned for high-density (R-4 or as amended) residential unless the annexation is accompanied by land use applications and a zone change request for a specific zoning district.

Assuming most of the OGA areas identified as residential in the 2020 Future Zoning and Growth Area Map are annexed with R-4 zoning, future development in the OGA could contribute to reducing existing and forecast housing shortages. However, many large areas of residential land within the OGA, particularly to the south of existing city limits, are currently used for agriculture and not necessarily available to accommodate future residential development.

Goals and Policies

The Othello Comprehensive Plan establishes the community's desire for a robust housing market with a mix of old and new neighborhoods, housing styles, densities, and a range of housing affordability. This section evaluates the City's current housing goals, policies, and objectives based on the likelihood they will help meet the needs identified in the Housing Needs Assessment. Each policy is assessed according to the criteria in Exhibit 11.

Exhibit 11. Evaluation Criteria

Evaluation	Criteria
V: Valid	The policy is valid and helpful. There is a continued need for the policy and it is likely to help the city meet the needs identified in the Housing Needs Assessment.
P: Partial	The policy is aligned to the needs identified in the Housing Needs Assessment but may not be sufficient to meet those needs.
C: Challenge	The policy may challenge the city's ability to meet the needs identified in the Housing Needs Assessment. The policy's benefits and consequences should be reviewed to optimize the ability to meet the policy's objectives while minimizing the negative impacts on meeting the housing needs of all community members.
NA: Not Applicable	The policy does not impact the city's ability to meet the needs identified in the Housing Needs Assessment.

Exhibit 12. Review of Housing Related Comprehensive Plan Goals, Policies, and Objectives

Adopted Goals, Policies, and Objectives	Link to HNA Needs
Land Use Element	
GOAL 1.1 Create a City Vision for Othello.	V
Objective 1.1.1: Define the character of Othello through a visioning process.	P – a defined vision would likely support affordable and accessible housing opportunities; the public process could advance the type and balance of housing in relation to job needs and other land uses. Without careful attention, a focus on neighborhood character could discourage development that supports some identified communitywide housing needs.
Objective 1.1.2: Create a comprehensive plan for Othello which can be conscientiously pursued once defined.	NA
Objective 1.1.3: Create an annexation strategy for evaluating annexation requests.	NA
Policy 1.1.1: The City of Othello vision should be revisited regularly as new councilmembers join the city council.	NA
Policy 1.1.2: Promote a service delivery system visible to users, accessible to all, and centrally located.	NA
Policy 1.1.3: Promote an annexation strategy that ensures requests for expansion result in development projects; effective and efficient service delivery; and that do not place undue burden on city taxpayers for the expansion of city services.	P – supports development opportunities but lacks specificity.
GOAL 1.2 Provide major activity centers along transportation corridors.	NA
Objective 1.2.1: Develop an Othello Growth Area map which identifies the area where the City intends to grow and develop infrastructure for the provision of city services.	NA

Adopted Goals, Policies, and Objectives		Link to HNA Needs
	Objective 1.2.2: Identify commercial nodes within the Othello Growth Area which provide for commercial growth opportunities without taking the focus off of the City's existing commercial corridors.	NA
	Policy 1.2.1: The City must ensure that new commercial activity centers along transportation corridors are used as gateway sites that provide a positive impression of Othello from the transportation corridor.	NA
	Policy 1.2.2: Development opportunities created by city expansion should not sacrifice quality of life, aesthetics, city reputation, or the overall impression of the City as a whole, in order to maximize individual economic opportunities.	NA
	Policy 1.2.3: Developments adjacent to transportation corridors, gateways, or intersections of concern, should be responsible for contributing to the development of gateway features.	NA
GOAL 1.3	Identify Focused Public Investment Areas (FPIA) for efficient and targeted spending on urban services.	P – supporting policies could be added that support housing co-located with amenities and targeted investments.
GOAL 1.4	Develop sub-area or neighborhood plans with detailed plans for self-identified areas or neighborhoods.	P – supporting policies could be added to promote affordable and accessible owner and rental housing opportunities within future neighborhood delineations.
GOAL 1.5	Integrate land use decisions with public facility and utility uses.	V
	Policy 1.5.1: Annexations shall be evaluated by the annexation priorities outlined in this plan.	NA
	Policy 1.5.2: Annexation areas will automatically be zoned for high-density (R-4 or as amended) residential unless the annexation is accompanied by land use applications and a zone change request for a specific zoning district.	V
GOAL 1.6	Provide a land use pattern that can be efficiently provided with services.	V
	Objective 1.6.1: Create a Mixed Use zone which provides opportunities for mixed residential and commercial uses in attractive developments that enhance the City's character, quality of life, and economic vitality.	V
	Policy 1.6.1: Encourage industry to locate next to major routes of transportation.	NA
	Policy 1.6.2: Services should only be provided upon showing that development is consistent with the desired goals and policies of the comprehensive plan.	NA
	Policy 1.6.3: In order to prevent premature rural-density development within the growth area, lots created in the County after the CP is adopted should not be considered for service provision unless they are annexed prior to division.	V
GOAL 1.7	Create an attractive development atmosphere where commercial and industrial opportunities can provide local economic growth.	NA
	Policy 1.7.1: Build on local goods and services that can be made regional, national or international export opportunities.	NA
	Policy 1.7.2: The City commits to creating regulations and processes which encourage development activities without sacrificing quality of life.	NA
GOAL 1.8	Create a regulatory atmosphere that encourages development in a responsible manner.	V
	Objective 1.8.1: Adopt and enforce building, fire and development code standards that ensure a safe and attractive community.	NA

Adopted Goals, Policies, and Objectives		Link to HNA Needs
	Objective 1.8.2: Create an environment where development occurs concurrent with the utilities, infrastructure, and facilities required to support the growth.	V
	Objective 1.8.3: Encourage new growth to locate in or near the built-up area of Othello or where utilities are readily available for extension.	P – policy could be strengthened to better support housing co-located with amenities/access to opportunities in addition to infrastructure. The City could also invest in infrastructure to help attract housing.
GOAL 1.9	Create a development process that is clear, responsive, timely, and predictable.	V
	Objective 1.9.1: Adopt changes to the Othello Municipal Code to simplify the development process.	V
	Objective 1.9.2: Reorganize the Othello Municipal Code so that information is organized in a manner which eliminates conflicts; clarifies processes; and clarifies applicable standards.	V
	Objective 1.9.3: Create processes that have clear submittal standards, timelines, and approval criteria.	V
Housing Element		
GOAL 2.1	Provide for a diverse mix in housing types, density, location and affordability.	V
	Policy 2.1.1: Develop an inclusionary zoning program which requires mixed affordability in a zone.	P – supports more affordable housing options but could be strengthened by identifying specific land use categories.
	Policy 2.1.3: Pursue Crime Free Rental Housing practices.	C – may disproportionately target low-income renters, discourage victims of abuse or other crime from contacting authorities, and inadvertently violate prohibitions against housing discrimination (e.g., Federal and State fair housing laws).¹⁴ The City repealed this practice from the Othello Municipal Code in 2019. Consider amending the policy to focus more on landlord-tenant relationships and quality design per Objectives 2.1.1 and 2.1.3.
	Policy 2.1.4: Explore a mix of densities and housing types that serve seniors, disadvantaged, and disabled housing needs.	V
	Policy 2.1.5: Develop a program for the maintenance of residential units that can be seen from highways.	NA
	Objective 2.1.1 Create a tenant/landlord handbook focusing on rights and responsibilities for each.	C – may inadvertently raise rents if landlords perceive an increased fiscal cost.
	Objective 2.1.2 Create tools and mechanisms to make housing affordable.	P – supports affordable housing but lacks specificity.
	Objective 2.1.3: Create a Crime Prevention Through Environmental Design (CPTED) program.	NA
	Objective 2.1.4: Develop a financial mechanism to preserve and rehabilitate small apartment complexes (8-20 units?).	V
	Objective 2.1.5: Develop a program for the rehabilitation of residential units that can be seen from highways.	NA
	Objective 2.1.6: Develop a range of density targets for implementation through zoning.	V

¹⁴ See: <https://www.atg.wa.gov/news/news-releases/ag-takes-discriminatory-blanket-housing-bans-renters-criminal-histories>.

Adopted Goals, Policies, and Objectives		Link to HNA Needs
	Objective 2.1.7: Develop the tools to implement mixed densities. Examples include mixed lot sizes, smaller lot sizes, accessory dwelling units off of alleys, single room occupancy units, bungalows, and cottages.	V
GOAL 2.2	Develop an Othello Growth Area that provides adequate land designated for residential development.	V
	Objective 2.2.1: Develop and periodically update the Othello Growth Area map to address growth pressures and opportunities.	V
GOAL 2.3	Preserve, protect & strengthen the vitality and stability of existing neighborhoods.	V
	Objective 2.3.1: Develop and periodically update the Othello Growth Area map to...	Note: This objective is unfinished in the Comprehensive Plan but appears to be a duplicate of Objective 2.2.1. Suggest removing or clarifying.
	Objective 2.3.2: Create a neighborhood planning structure for the creation of individual neighborhood plans.	V
	Objective 2.3.3: Encourage neighborhoods to develop centered on schools and grouped around retail and civic areas.	V
	Objective 2.3.4: Improve the quality of housing and neighborhoods by educating landlords, tenants and property owners about health and safety code requirements, property maintenance Best Management Practices, and by enforcing code compliance when necessary.	V
GOAL 2.4	Create a development process that is clear, responsive, and predictable.	V
	Objective 2.4.1: Improve the planned unit development process so that it provides new opportunities for residential and mixed use developments.	V
	Objective 2.4.2: Review planned unit development (PD) provisions in the Land Use Code to ensure maximum opportunity for flexible siting, design, and construction of residential developments and amend the provisions as appropriate. Clustering of new structures to promote open space and quality of life, and the provision of mixed densities within each new subdivision should be encouraged.	V
Other Elements		
<u>Capital Facilities & Utilities</u>		
GOAL 3.1	Develop a funding strategy that balances project funding between private contributions, the City's budget, the City's reserves, and obtaining grants.	V
	Objective 3.1.1 Pursue grants from state and federal agencies as a means to encourage development.	P - consider adding some priorities around encouraging diverse and affordable housing and living wage jobs to strengthen the policy.
<u>Economic Development</u>		
GOAL 5.3	Stimulate and diversify Othello's retail and commercial economy.	V
	Objective 5.3.6 Seek community input to determine if in-home businesses might expand with additional business development assistance. This includes business planning, business marketing and business loans.	P – could stimulate development of more diverse types of housing conducive to live-work opportunities.
	Objective 5.3.12 Facilitate diverse residential growth that results in an increase in moderate and upper income population levels to support retail expansion and recruitment.	C – supports diverse residential growth but emphasis on higher income earners may displace low and moderate income households without proper protections.

Adopted Goals, Policies, and Objectives		Link to HNA Needs
<u>Parks & Recreation</u>		
GOAL 6.1	Coordinate land use decisions and financial resources with a schedule of park and recreation capital improvements to meet adopted level of service standards, measurable objectives, and provide existing and future facility needs.	V
	Policy 6.1.1 Ensure that developers, and/or the City as applicable, provide for the availability of park and recreation facilities to support development, concurrent with the impacts of such development, in accordance with the level of service standards stated herein.	V
<u>Parks & Recreation</u>		
GOAL 6.5	Coordinate open space development which will assist in directing the desired urban growth and land use pattern.	V
	Policy 6.5.2 Require the dedication of land, improvements, or fees in lieu thereof, for park and recreational purposes in all new subdivision in the city.	V
<u>Conservation & Environment</u>		
GOAL 7.2	Protect General Agricultural land from urban sprawl and low density residential development.	V
	Policy 7.2.1 Urban sprawl is considered a net density of 4 units or less per acre for the overall density for a project.	V
	Policy 7.2.2 Mixed Use developments may be exempt from this density if it can be demonstrated that the project meets the goals and polices of this plan.	V
	Policy 7.2.3 Developments with a mix of housing types and lot sizes may be exempt from this density if it can be demonstrated that the project meets the goals and polices of this plan.	V

Source: City of Othello, 2015; BERK, 2020.

Key Takeaways

- Remaining land capacity in areas zoned residential is likely not sufficient to meet current and projected 2035 housing needs, especially if the community wishes to achieve a household size more consistent with the county or statewide averages. Overcrowding is a significant issue in Othello and is most pronounced amongst renter households.¹⁵ Under the “High Growth” scenario (2035 population of 11,007 or 2,492 over the 2020 population), an estimated 805-1,029 new dwelling units will be needed by 2035 to achieve an average household size consistent with Adams County or the state. Based on 2020 zoning code updates and City staff’s current estimates of vacant residential land within city limits, vacant residential land (including 70 acres with a preliminary site design) could accommodate about 561 units if developed at the 2015 rate of density (see bullet below).¹⁶ If developed at the maximum densities allowed, vacant residential land could accommodate

¹⁵ About 17% of occupied housing units in the city have more than one occupant per room compared to 13% in Adams County and 3% statewide. Amongst renter households, nearly one-third of Othello households (31%) have more than one occupant per room compared to 23% in Adams County and 6% statewide. U.S. Census Bureau, 2014-2018 ACS 5-Year Estimates (Table B25014); BERK, 2020.

¹⁶ Based on the land capacity analysis in the 2015 Comprehensive Plan and new housing units added since then, vacant residential land within the city could accommodate an additional 2,110 units if developed at the highest density, 399 units if developed at the lowest density, and 370 units if developed at the 2015 rate of density. Zoning code and map updates adopted in early 2020 slightly increased citywide residential land capacity, primarily by upzoning vacant parcels and allowing multi-family or mixed-use in most commercial areas.

between 697-1,417 units depending on the type of development.¹⁷ In addition, multi-family or mixed-use development is now allowed in most commercial areas. Several large vacant commercial areas in the southern and eastern portions of the city zoned C-3 could be developed as mixed-use.

- Despite the range of residential density options, the city has developed at a flat rate of density ranging between approximately 3.5 and 6.7 dwelling units per acre, with the greatest density in the R-3 zone and densities of about 3.5 dwelling units per acre in the R-4 zone.¹⁸ Data from OFM and the City indicate that new permitted units since 2015 are mostly single-family and thus continuing existing development patterns.
- Future development in the OGA could contribute to reducing existing and forecast housing shortages. However, many large areas of residential land within the OGA, particularly to the south of existing city limits, are currently used for agriculture and not necessarily available to accommodate future residential development. Land Use Policy 1.5.2 in the Comprehensive Plans directs the City to automatically zone residential areas in the OGA that are annexed as high density (R-4).
- Many policies in the Comprehensive Plan align with gaps identified in this needs assessment, either as-is or with minor adjustments. Some policies could be strengthened or added to more specifically support affordable and accessible housing opportunities (for both renters and owners) and to support housing co-located with amenities and infrastructure investments. A few policies may disproportionately target low-income renters, inadvertently raise rents, or displace low and moderate income households.

Development Regulations

This section reviews relevant existing codes to assess the possibility of clarifying or streamlining regulations to support development of additional diverse types of affordable and market rate housing to meet the needs of a wider variety of households.

Zoning Code

The City currently offers residential and commercial zoning designations that allow a range of housing types and densities (Exhibit 13). Gross densities vary from 1 to 17 dwelling units per acre in residential districts and are effectively limited by height, parking requirements, and other development standards in commercial districts. A single accessory dwelling unit for on-site security or maintenance personnel and family is allowed in some industrial areas. Development standards in residential zones include minimum lot sizes, maximum stories (effectively regulating height), maximum dwelling units per lot, setback and landscaping requirements, and off-street parking requirements. Residential zones require front setbacks of 20 feet, interior side setbacks of 5 feet (10-15 feet for corner lots), and rear setbacks of 5-8 feet. In all residential zones, a maximum of 35% of the lot area can be covered by residential and accessory buildings. All commercial zones have a maximum building height of 4 stories or 62 feet and

¹⁷ Most of the remaining vacant residential land within city limits is zoned R-4. However, maximum residential densities for tri-plex and four-plex development are currently lower in the R-4 zone than the R-3 zone (see Key Takeaways under Development Regulations). If developed at the maximum densities currently allowed in the R-3 zone, vacant residential land could accommodate between 633-1,783 units depending on the type of development.

¹⁸ See Figure 2-7 in the 2015 Comprehensive Plan.

require various setbacks. Parking requirements vary, but stalls must be at least 9 feet wide and 20 feet long, or 180 square feet per stall; tandem parking spaces are allowed for residences of up to four dwelling units.

The Comprehensive Plan communicates a desire to have a zoning code that creates opportunities for multiple types of housing units, a mix of housing types (both within the community and within individual developments), and options for mixed use housing. New provisions for mixed use development in commercial zones were added as part of the zoning code update in early 2020.

Exhibit 13. Maximum Residential Densities and Summary of Development Standards by Zone, 2020

Designation Name	Maximum Residential Density	Summary of Development Standards
Residential		
R-1: Residential District One	<ul style="list-style-type: none"> 3.8 du/ac 	<ul style="list-style-type: none"> Min lot size: 8,000 ft² Max height: 2 stories Max du/lot: 1 Residential parking: min of 2 and max of 4
R-2: Residential District Two	<ul style="list-style-type: none"> 4.4 du/ac for single family and 8.7 du/ac for duplexes. 	<ul style="list-style-type: none"> Min lot size: 7,000 ft² Max height: 2 stories Max du/lot: 2 Residential parking: min of 2 per dwelling unit; max of 4 per single family, max of 3 per dwelling unit for duplexes
R-3: Residential District Three	<ul style="list-style-type: none"> 4.4 du/ac for single family, 8.7 du/ac for duplexes, 13.1 du/ac for tri-plexes, and 17.4 du/ac for four-plexes. 	<ul style="list-style-type: none"> Min lot size: 7,000 ft² Max height: 2 stories Max du/lot: 4 Residential parking: min of 2 per dwelling unit; max of 4 for single family, 3 per dwelling unit for duplexes, and 2 per dwelling unit for tri-plexes/four-plexes
R-4: Residential District Four	<ul style="list-style-type: none"> 5.1 du/ac for single family, 10.2 du/ac for duplexes, 12.0 du/ac for tri-plexes, and 13.3 du/ac for four-plexes. No limit for multi-family development. Density limited by height (3 stories), parking requirements, and other development standards. 	<ul style="list-style-type: none"> Min lot size: 6,000 ft² – if more than 2 dwelling units, code requires an additional 900 ft² of site area, 300 ft² of landscaping, and 400 ft² of parking per dwelling unit Max height: 3 stories Max du/lot: dependent on lot size Residential parking: min of 2 per dwelling unit; max of 4 for single family, 3 per dwelling unit for duplexes, and 2 per dwelling unit for tri-plexes/four-plexes/multi-family
R-M: Residential-Medical District	<ul style="list-style-type: none"> 4.4 du/ac 	<ul style="list-style-type: none"> Min lot size: 7,000 ft² Max height: 3 stories and 60' Max du/lot: 1 Residential parking: min of 2 and max of 4
S-1: Suburban	<ul style="list-style-type: none"> 1 du/ac 	<ul style="list-style-type: none"> Min lot size: 1 acre Max height: 2 stories Max du/lot: 1 Residential parking: min of 2 and max of 4

Designation Name	Maximum Residential Density	Summary of Development Standards
Commercial		
Commercial Use District One (C-1)	<ul style="list-style-type: none"> Mixed use development allowed with residential in a basement or upper story. Density limited by height (4 stories or 62'), parking requirements, and other development standards. 	<ul style="list-style-type: none"> Max height: 4 stories or 62' Max front yard setback: 0' Residential parking: there are currently no parking standards established for residential development in commercial zones
Commercial Use District Two (C-2)	<ul style="list-style-type: none"> Residential without street frontage commercial must be located more than 140' (a half block) from Main Street or Highway 26. Minimum of 3 du/building with no upper limit for multi-family development. Mixed use development allowed with residential in a basement or upper story. Density limited by height (4 stories or 62'), parking requirements, and other development standards. 	<ul style="list-style-type: none"> Max height: 4 stories or 62' Min front yard and corner lot side setbacks: 15' Residential parking: there are currently no parking standards established for residential development in commercial zones
Commercial Use District Three (C-3)	<ul style="list-style-type: none"> Mixed use development allowed with residential in a basement or upper story. Density limited by height (4 stories or 62') and other development standards. 	<ul style="list-style-type: none"> Max height: 4 stories or 62' Min front yard and corner lot side setbacks: 15' Residential parking: there are currently no parking standards established for residential development in commercial zones
Industrial		
Industrial District One (I-1)	Not applicable. A single dwelling unit per site is allowed as an accessory use for on-site security or maintenance personnel and family.*	
Industrial District One (I-2)	Not applicable. A single dwelling unit per site is conditional as an accessory use for on-site security or maintenance personnel and family.*	
Open Space		
Open Space Recreational	Not applicable.	
Open Space Urban Reserve	Not applicable.	
Overlays		
Planned Development District Overlay	<ul style="list-style-type: none"> Population density and building intensity evaluated in light of the densities and intensities permitted in the underlying zone Density uniquely determined through PDD process and any associated development agreements, where applicable. More intensive use than the underlying zoning only permitted if there is a true mixed use within the planned unit development. 	

*Note: The sole purpose of the dwelling must be to furnish housing for an employee, including family, engaged in on-site security or maintenance.

Source: City of Othello Ordinances 1546 and 1547, 2020; BERK, 2020.

Planned Development District Overlay

Othello Municipal Code (OMC) Section 17.54.010 states that the purpose of planned development district overlay is "...to allow greater flexibility in the design of residential, commercial or industrial uses or a mixture of such uses by permitting specific modifications of the bulk and use regulations and performance standards of the underlying zone(s) as applied to a particular parcel of land. A planned development district is a floating district. Each approved planned development district is superimposed on the underlying zone to the extent that the planned development district shall modify and supersede the bulk and use regulations and performance standards of the underlying zone."

Planned development districts encourage flexibility in design and development through clustering, more efficient layout of public improvements, and deviations from the underlying zoning that allow for more intensive but complimentary uses. This can result in a more desirable use of the land and can better accommodate development on sites limited by geography, topography, or shape. Othello allows for appropriate commercial, public, or quasi-public uses in planned unit residential developments if these uses are for the exclusive benefit of the residential development (OMC 17.54.020(c)(2)).

There is currently one planned development district in the city, which includes Coventry House assisted living and the neighborhood fronting on Coventry and Larkspur to the north.

Key Takeaways

- The new zoning code and map adopted in early 2020 have increased residential land capacity through slightly higher densities, upzones in undeveloped areas, and updates to allow multi-family or mixed-use development in most commercial areas. Numerous large vacant commercial areas in the southern and eastern portions of the city zoned C-3 now allow mixed-use development opportunities.
- Maximum residential densities for tri-plex and four-plex development are currently lower in the R-4 zone than the R-3 zone. In the R-4 zone, the current code requires an additional 900 ft² of site area, 300 ft² of landscaping, and 400 ft² of parking (1,600 ft²) per dwelling unit above the minimum 6,000 ft² lot size when developing more than two dwelling units. This means a tri-plex requires a minimum lot size of 7,600 ft² and a four-plex requires a minimum lot size of 9,200 ft², which is higher than the minimum lot size of 7,000 ft² required in the R-3 zone for either type of development. Removing the additional lot area requirements would be more consistent with the intended purpose of the R-4 zone to allow the highest-density residential.
- The existing code lacks incentives to develop at the higher residential densities allowed. Some strategies that could encourage smaller detached single family homes, family-sized multi-family development, or infill development within existing city limits include density bonuses for affordable housing, reduced permitting fees or development costs, provisions for ADUs or smaller lot homes, increasing the maximum lot area covered by buildings in residential zones, and changes to overly large minimum lot sizes or lot widths, setbacks and allowed uses within setbacks, or landscaping standards. Such strategies could be coupled with other tools such as design standards and/or guidelines to promote higher density housing that is compatible with existing neighborhood and communities.
- A lack of minimum densities (maximum lot sizes) in residential zones is contributing to the homogenous housing environment and existing housing supply shortage. Requiring a minimum

density could be coupled with other tools (such as design standards and/or guidelines, streetscape improvements, or floor area ratio caps) to mitigate negative impacts and enhance the design of development. Exempting desired housing types, such as townhomes or tri-plexes, from lot size minimums or other restrictive standards would allow flexibility in the size and design of housing and encourage higher allowed residential densities.

- Allowing clustering and/or lot size averaging in some residential zones or subdivisions provisions could increase housing supply and diversity (lot size averaging is currently allowed in Planned Development Districts). This arrangement within the standard zoning or subdivision process can create more predictability for developers by simplifying the development review process and eliminating or minimizing the possibility of costly conditions of approval.
- Encouraging or requiring alleys, parking in the rear, or shared parking areas could support higher density attached and detached residential development while maintaining desired community character. If an alley exists, parking could be required in the rear and to be accessed via the alley. In areas without an alley or feasible alley access, adding provisions for adjacent properties to share a driveway could more efficiently accommodate rear parking. Parking standards for multi-family development could also be revised to be based on the number of bedrooms instead of dwelling units, or to allow reduced parking standards for senior, low-income, or other types of households that often have lower rates of car ownership.
- Residential parking standards that support mixed-use and multi-family development should be established for commercial zones.
- Reducing street width requirements, particularly for neighborhood streets with lower speed limits, could facilitate additional housing and would support households or housing types with typically lower rates of car ownership. This could be incorporated via planned development districts or through changes to the Public Works Design Standards.

Statewide Housing Requirements

Partially planning communities like Othello must meet statewide requirements to ensure fair housing and to allow manufactured housing, accessory dwelling units, affordable housing on religious organization properties, or other items. Exhibit 14 summarizes statewide housing requirements and reviews Othello's housing plans, policies, and processes (including existing development regulations and permitting processes related to housing development) in relation to these requirements and needs identified in the housing needs assessment.

Exhibit 14. Statewide Housing Requirements

Housing Topics	Summary of Requirements	Link to Othello Plans, Policies, and Processes and HNA Needs
<p>Manufactured Homes and Manufactured Home Communities RCW 35.63.160-161, RCW 35A.63.145-146, and RCW 36.70.493</p>	<p>Cities and counties may designate new manufactured housing communities as a nonconforming use, but may not order the removal or phased elimination of an existing manufactured housing community because of it is a nonconforming use. Cities are also not allowed to prohibit the entry or require the removal of a manufactured/mobile home, park model, or recreational vehicle authorized in a manufactured housing community because the community is a nonconforming use.</p> <p>Cities that don't allow for manufactured homes on individual lots in their comprehensive plans had to review the need and demand for such homes by December 31, 1990.</p> <p>The state also sets definitions standards for the terms "designated manufacture home" and "new manufactured home" in RCW 35.63.160.</p>	<p>Manufactured homes are allowed subject to applicable standards and any footnotes in all of Othello's residential zones (OMC 17.20.030).</p> <p>In the OGA, the Adams County Code (ACC) allows manufactured homes in the RR, PA, and GA zones, and requires a conditional use permit in the R-1 and RS zones (ACC 17.08.040).</p>
<p>Persons with Handicaps RCW 35.63.210-220, RCW 35A.63.240, RCW 36.70.493</p>	<p>Policies and regulations cannot treat a residential structure occupied by persons with handicaps differently than a similar residential structure occupied by a family or other unrelated individuals.</p>	<p>A policy on fair housing practices could be added to the Comprehensive Plan to strengthen the City's commitment to fair housing in general and specifically for persons with a disability.</p>
<p>Increased Density for Religious Organizations RCW 35.63.280 and RCW 35A.63.300</p>	<p>Cities must allow an increased density bonus consistent with local needs for an affordable housing development on property owned or controlled by a religious organization.</p>	<p>This is a new state law. Density bonuses are not currently incorporated into the Othello zoning code. At a minimum, the City should incorporate density bonuses for affordable housing located on property owned by a religious organization to be consistent with state code.</p> <p>There are several church properties within city limits. Some properties may be opportunities to develop long-term affordable housing at lower costs.</p>

Housing Topics	Summary of Requirements	Link to Othello Plans, Policies, and Processes and HNA Needs
Residential Care Facilities RCW 35A.63.149 and RCW 36.70.755	Counties that do not provide for the siting of residential care facilities in zones that are designated for single-family or other residential uses were required to conduct a review of the need and demand for the facilities by August 30, 1990. Municipalities within those counties were then required to adopt an ordinance to implement changes identified in the county's findings by June 30, 1991.	For the OGA, Adams County Code allows residential care facilities (convalescent homes/nursing homes) through conditional use permits in residential zones R-1, RR, and RS (ACC 17.08.040). The City of Othello allows nursing homes, convalescent homes, assisted living, or similar residential/medical uses and their support facilities in the R-M zone and conditionally in the R-4 zone (OMC 17.20.030).
Accessory Dwelling Units RCW 35A.63.230 and RCW 43.63A.215.	Requires Washington cities and towns with populations above 20,000 residents to plan for ADUs in single family neighborhoods.	Othello's current population is below the 20,000 threshold of this law. Incorporating provisions for ADUs in some or all residential zones, however, could be an effective tool to add a wider variety of housing choices in the city, increase housing supply on existing land, and stimulate development densities closer to those allowed by the existing zoning code. It may also support more affordable homeownership opportunities.

Source: RCW, 2020; Adams County Code, May 2020; Othello Municipal Code, 2020; BERK, 2020.

Key Takeaways

- Othello's existing plans and regulations are mostly in compliance with statewide housing requirements. However, per RCW 35.63.280 and RCW 35A.63.300, the City should add language to their development code to allow density bonuses for affordable housing located on property owned by a religious organization.
- A policy on fair housing practices could be added to the Comprehensive Plan to strengthen the City's commitment to fair housing practices in general and specifically for persons with a disability.
- While not required by state law because of the city's current population level, incorporating provisions for ADUs in some or all residential zones could be an effective tool to add a wider variety of housing choices in the city, increase housing supply on existing land, and stimulate development densities closer to those allowed by the existing zoning code through infill.