Background

A 1997 amendment to the Growth Management Act (GMA), RCW 36.70A.215, requires certain jurisdictions planning under the GMA to review and evaluate whether actual development within the urban growth areas is at urban densities and is consistent with GMA goals, the jurisdictions’ growth targets and comprehensive plans. The program is commonly referred to as “buildable lands” and jurisdictions document their results in reports every five years. If an inconsistency is found, it requires implementing reasonable measures that are likely to increase consistency during the subsequent five year period. The purpose of this requirement is to increase residential density or employment capacity within existing urban growth areas (UGAs) prior to expanding the UGA. This requirement advances GMA objectives for compact urban development and reduced sprawl. The Snohomish County Tomorrow 2002 Growth Monitoring/Buildable Lands Report was prepared to meet the GMA review and evaluation requirement, and found no inconsistency between actual development and plan policies in Snohomish County. Therefore, no reasonable measures were required. This “Reasonable Measures Background Report” reconfirms Snohomish County’s fulfillment of the GMA requirements under RCW 36.70A.215 and satisfies related requirements in the Countywide Planning Policies (CPP) for Snohomish County.

Snohomish County has adopted a Countywide Planning Policy (CPP) that implements RCW 36.70A.215, after consultation with the cities in the County through Snohomish County Tomorrow. Regardless of whether an inconsistency is found relative to RCW 36.70A.215, CPP UG-14 requires consideration of reasonable measures prior to initiating UGA expansions that are based on UG-14 d. 1-4. This requirement is achieved by referring to a list of measures and guidelines, both found in Appendix C of the CPPs.

Starting with the 2004-2005 Comprehensive Plan updates, each jurisdiction “…will demonstrate its consideration of reasonable measures in its comprehensive plan or, at its discretion, in a separate report.” Appendix C of the CPPs and the reasonable measures comments from the cities are included as Appendices C and D to this report.

Snohomish County interprets the term “reasonable measures” in two ways. First, the measures or actions may be reasonably expected to increase the efficient use of land in urban growth areas. Second, the measures are compatible with the existing development. In other words, while it might be effective to develop residences at 50 units per acre, such development might not be compatible with residential areas at the low end of allowable urban densities, both in terms of aesthetics and available services.

Snohomish County adopted initial growth targets as part of the development of its first GMA Comprehensive plan in 1995. In 2002, the County analyzed whether it still had capacity for the 2012 time horizon of that plan. The result of that analysis, the 2002 Growth Monitoring/Buildable Lands Report, found no inconsistencies between actual development and growth targets and existing policies in its evaluation of land capacity for residential development and employment. In particular, it found that the county was achieving the desired reduction in the proportion of growth in the rural areas of the county. Only 13% of growth between 1995 and 2000 went into rural areas. It also showed that achieved densities within the UGA were consistent with GMA comprehensive plans and development regulations. The report supports the conclusion that urban-rural growth patterns have been consistent with the policies of the County’s GMA Comprehensive Plan, which call for greater concentration of population within UGAs. The report also supports the conclusion that
actual population and employment densities within UGAs have been consistent with the
designations contained in the land use element of the County’s GMA Comprehensive Plan.

Snohomish County and the cities also contracted for reports on Reasonable Measures. In 2003,
EcoNorthwest prepared a report containing a list of reasonable measures and a proposed method
for analyzing the need for reasonable measures. An annotated list is included as Appendix B to this
report.

As part of the 10-year GMA Comprehensive Plan Update, the County has completed a cooperative
process of initial population allocation to the cities, unincorporated UGAs and identified rural lands
in Snohomish County for the 2025 plan time horizon. Now, the County is reviewing alternative
ways to accommodate the unincorporated County’s share of projected population growth. Review
and analysis of reasonable measures will allow the County to maximize the utilization of land within
UGAs before considering UGA expansions. This process will be completed by a reconciliation of
population targets after adoption of the County and city comprehensive plan updates in 2005.
Those updates, which will include adoption of reasonable measures by jurisdictions, will provide the
final population allocation and will be adopted into the CPPs.

Snohomish County’s review focuses primarily on residential capacity because there is a significant
need to increase residential capacity in order to accommodate the 2025 population target for the
unincorporated UGA. There is also discussion in footnote 1 and at the end of the report on
expansion of UGAs for employment land.

Section I of this report gives a brief summary of the findings of the 2002 Buildable Lands Report in
relation to reasonable measures.

Section II identifies code amendments and other actions that qualify as reasonable measures and
have been implemented by Snohomish County. The section also includes analysis of some of the
more significant measures and their impact on development throughout the countywide
unincorporated UGA.

Section III identifies additional reasonable measures for consideration. These measures are
potentially effective in increasing urban residential density in concert with the goals and policies of
the Snohomish County GMA Comprehensive Plan. This section also includes a summary of the
impact of current and proposed reasonable measures.

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1 The preferred alternative of the Comprehensive Plan update includes two large UGA expansions for employment – Wellington
Hills and North Marysville. These UGA expansions are needed in order to provide sites large enough to attract major regional
employers due to a shortage of large contiguous parcels with remaining employment capacity. A third area, the Cathcart landfill,
is already in the UGA, and has been rezoned to allow for employment, similar to Wellington Hills and North Marysville.
Appendices:

**Appendix A** - A table listing the status of all population measures recommended for consideration in unincorporated Snohomish County

**Appendix B** - Excerpt from the Phase II report: Recommended Method for Evaluating local Reasonable Measures Programs, Description and Assessment of Reasonable Measures Policies

**Appendix C** - Appendix C to the Countywide Planning Policies

**Appendix D** - Reasonable Measures reports from cities

Section I. Findings of the 2002 Buildable Lands Report

Snohomish County completed a Growth Monitoring/Buildable Lands Report in 2002. The detailed analysis of growth and development trends in Snohomish County from 1995 to 2000 contained in that report did not identify inconsistencies between actual development densities and the densities contemplated in the County’s GMA Comprehensive Plan and implementing regulations, and showed sufficient capacity in the countywide UGA to accommodate 2012 growth targets.

Therefore, no specific program requirements fell to the County at that time. Rather, the 2002 Buildable Lands Report showed that cities and the county were achieving urban densities, consistent with their comprehensive plans, within urban growth areas during the period from 1995 to 2000. Evidence of increasing achieved densities combined with improved land use forecasting has led to higher estimates of population and jobs capacity within the existing urban growth area compared with those calculated in 1995. Specific findings demonstrate the achievements of land use measures introduced prior to 2000:

- Only 13 percent of the county’s population growth since 1992 took place outside the UGA, compared with pre-GMA levels of 28 percent, while 87 percent of the county’s population growth since 1992 has been accommodated inside the UGA.

- Average gross and net densities in single-family residential subdivisions were higher in areas within each of the unincorporated area’s Urban Residential – Low (UR-L), – Medium (UR-M), and – High (UR-H) comprehensive plan designations in 2000 compared to 1995.

- Major revisions in Planned Residential Development (PRD) provisions adopted in 1995 increased the use and effectiveness of this mechanism so that 58% of the new single-family residential lots in formal plats and segregated condominiums recorded between 1995 and 1999 were in PRDs, with a notable impact on achieved densities within single-family zones as reported in the 1999 and 2000 Growth Monitoring Reports.

In Scenario B of the Buildable Lands Report, the Gold Bar UGA showed inadequate capacity for its 2012 population growth target, but lack of sewers in that UGA do not permit measures to increase densities and the county does not plan to expand the UGA at this time. Scenario B also showed insufficient employment capacity within the Lake Stevens UGA to meet its 2012 employment target.
Section II. Adopted Reasonable Measures

Although the Buildable Lands Report found that the County has grown consistently with its GMA Comprehensive Plan, Snohomish County has nonetheless chosen to implement a wide range of reasonable measures from the adopted list in Appendix C of the CPPs in its efforts to better advance the goals of the GMA. An evaluation of the effectiveness of each measure is found in the Phase II Report: Recommended Method for Evaluating local Reasonable Measures Programs, ECO Northwest, June 2003. This material is included as Appendix B to this report. Descriptions of measures adopted by Snohomish County and comments on experience with certain measures follow.

A. Permit Accessory Dwelling Units (ADUs) in single family zones

The Snohomish County Code (SCC) permits accessory dwelling units (ADUs) both attached and detached, on single family, owner-occupied lots in residential zones.

Provisions allowing ADUs are codified at chapter 30.28 SCC. These sections have been in place in code since before 1995. Under the code, one ADU is permitted; the single family dwelling on the lot must be owner-occupied; the ADU size must be at least 360 sq. ft. and must not reduce the primary dwelling to less than 900 sq. ft.; one off-street parking space is required. For both attached and detached units, there are requirements for compatibility with the primary unit. The owner may reside in either unit.

As shown in Table 1 below, there have not been many legal ADUs created within the UGA since 1995. However, the numbers of approvals were higher in 2003 and 2004. This recent evidence suggests that ADUs may be created at a slightly higher rate in the future.

<table>
<thead>
<tr>
<th></th>
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<tbody>
<tr>
<td>Accessory Apartment Approvals</td>
<td>5</td>
<td>2</td>
<td>2</td>
<td>4</td>
<td>5</td>
<td>4</td>
<td>3</td>
<td>1</td>
<td>8</td>
<td>9</td>
<td>43</td>
</tr>
</tbody>
</table>

Source: Data from Snohomish County Planning and Development Services permit database, March 2005.

B. Provide Multifamily Housing Tax Credits to Developers

Tax Credit projects within Snohomish County are administered by the Washington State Housing Finance Commission. The Office of Housing and Community Development of Snohomish County has funded developments that also receive tax credits. As of 1999, 473 Housing Authority of Snohomish County dwelling units were developed using Low Income Housing Tax Credits (LIHTC).

From 2001 through 2003, 140 units were approved for allocation under the LIHTC.
C. Provide Density Bonuses to Developers

Chapter 30.42B SCC provides a 20 percent density bonus for residential developments using the PRD approach. It includes a multiplier related to housing type, offering more than a 20 percent bonus for retirement housing. This provision has been in place in code since before 1995.

Changes in 1995 allowed the bonus to be calculated based on gross site acreage, as opposed to net site acreage after the subtraction of roads, public dedications, and critical areas, greatly increasing the potential density bonus that could be achieved. In 1999, the minimum lot size was increased, reducing the potential density that could be achieved. 2001 changes capped the density that could be achieved at 7 dwelling units per net acre in single family zones. However, May 2004 amendments reduced the minimum lot size, raised the density cap, increased flexibility in development requirements and open space standards, and reduced perimeter landscaping requirements, increasing the potential density that can be achieved.

The impact of PRDs was studied as part of the 2000 Growth Monitoring Report published by Snohomish County Tomorrow.

Figure 1 on the following page shows that PRD provisions resulted in higher density subdivisions compared to non-PRD subdivisions within each urban zone in every year from 1995 to 1999 except one case – 1996 recorded plats within the R-9600 zone. That one case is basically a statistical anomaly as a result of a small sample size.
As shown in Figure 2, the majority of lots created in urban zones between 1995 and 1999 were created in subdivisions utilizing PRD provisions.
Together, these tables show that PRD density bonus provisions have been an effective measure contributing to higher achieved densities within the unincorporated UGA. Changes were made in the regulations in May 2004 offering more generous bonuses. These code changes are expected to result in higher density development inside the UGA in the future.

D. Allow Clustered Residential Development.

See discussion of PRDs in C. above. Lot size averaging, discussed in F. below, allows clustering of development on small lots in appropriate portions of a development area.

E. Allow Duplexes, Townhomes, and Condominiums.

- Chapter 30.22.100 SCC and chapter 30.22.130 (42) SCC allow duplexes in all single family zones on lots 1 ½ times the minimum lot size within UGAs. Table 2 shows the units created in duplexes since 1990.

<table>
<thead>
<tr>
<th>Year</th>
<th>Duplex Units</th>
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</thead>
<tbody>
<tr>
<td>1990</td>
<td>76</td>
</tr>
<tr>
<td>1991</td>
<td>70</td>
</tr>
<tr>
<td>1992</td>
<td>94</td>
</tr>
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<td>1993</td>
<td>86</td>
</tr>
<tr>
<td>1994</td>
<td>106</td>
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<td>1996</td>
<td>108</td>
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<tr>
<td>1997</td>
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<tr>
<td>1998</td>
<td>210</td>
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<td>1999</td>
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<td>2000</td>
<td>102</td>
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<tr>
<td>2001</td>
<td>76</td>
</tr>
<tr>
<td>2002</td>
<td>219</td>
</tr>
<tr>
<td>Total</td>
<td>1,575</td>
</tr>
</tbody>
</table>

Source: Data for Table 2 from the Snohomish County Tomorrow 2003 Growth Monitoring Report

- Townhomes are allowed in single family zones subject to the requirements of chapter 30.31E SCC including:
  - Limit of six units per building.
  - Bulk and setback variation.
  - Setbacks, lot area and coverage.
  - Landscaping and open space requirements.
  - Submittal of a Binding Site Plan.
- Condominiums created under chapters 64.32 or 64.34 RCW may obtain approval under the terms of chapter 30.41D SCC including:
  - Submittal of a Binding Site Plan.
  - Compliance with the noise code, building code and variety of fire safety codes.

Condominiums (as a form of ownership, not housing type) are allowed in all single family and multi-family zones.

F. Allow Small Residential Lots.

Snohomish County has had a lot size averaging code provision, codified at chapter 30.23.210 SCC, in place since before 1995. The minimum lot size was established at 6,000 square feet, and could include portions of critical areas. This resulted in an increase in gross and net densities achieved within the UGA. In October 2003, the lot size averaging code section was changed to allow lots as small as 3,000 square feet. Since that time, lot size averaging has been used for a majority of plats and is generally increasing the density achieved in subdivisions.
Out of 82 formal plats filed in 2004 for properties within the unincorporated UGA, 61 or 74.4% utilized lot size averaging. Subdivisions using lot size averaging accounted for 60.3% of the total lots in formal plats filed in 2004. In addition, 62.5% of the 72 short plats in the unincorporated UGA filed during that period took advantage of lot size averaging provisions.

Chapter 30.22.100 SCC allows for small-lot single-family development and a variety of attached housing options through the LDMR and MR zones.

**G. Encourage Infill and Redevelopment.**

See discussion of Urban Centers and Villages in I. below.

**H. Plan and Zone for Affordable and Manufactured Housing Development.**

Snohomish County provides sufficient land for multi-family housing through analysis conducted as part of the comprehensive planning process. Using the Residential Land Use Needs Analysis (RLUNA), staff determines the amount of land needed to be zoned for multi-family housing. The assumption is that most low-income housing will be multi-family. In addition, land is zoned for small lots, townhouses, and duplexes as described elsewhere in the report. While not a proxy for affordability, higher density zoning provides greater opportunity for housing affordability.

Modular and manufactured housing certified by U.S. Department of Housing and Urban Development since 1976 are allowed in all zones allowing single family housing in Snohomish County.

**I. Encourage the Development of Urban Centers and Urban Villages.**

The Snohomish County Comprehensive Plan embodies an over-all concept known as diversified centers, which reflects the PSRC vision of urban centers while also recognizing the diverse character and scale of the county’s 20 towns and cities. The Plan designates several locations within unincorporated portions of UGAs for the development of new urban centers. These center locations are near arterial roads or highways and transit routes and will evolve over time primarily through infill and redevelopment.

To help stimulate this process, Snohomish County has established an Urban Centers Demonstration (UCD) program to encourage high-density residential—up to 50 units per acre, mixed use infill development within specified center locations (chapter 30.34A SCC). This program was adopted in 2001, and in the fall of 2003 the county established specific boundaries for the urban center at 164th and I-5. Two high-density mixed use developments have been approved. Newberry Square, currently under construction includes housing at 23 units per gross acre plus 60,000 square feet of office and retail space on 5.9 acres. A second project, Esplanade at Mill Creek, which includes apartments, town homes, and senior housing along with a retail center, began construction in 2004.

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3 Data from Snohomish County Planning and Development Services permit database, March 2005.
Modifications to standard zoning code requirements under the demonstration program include reductions in parking, increased building heights, and reductions in perimeter landscaping. The demonstration program is expected to lead to a permanent program to be governed by new sections of the code expected to be in place by mid-2005.

J. Allow Mixed Uses.

The Urban Centers Demonstration Program, described in I. above, requires mixed uses. Mixed use, including residential and commercial and/or retail, is an allowed use in designated Urban Centers, Urban Villages and Transit/Pedestrian Villages under chapter 30.34A SCC.

Residential uses are permitted in selected commercial zoning districts, providing the opportunity for mixed-use development in those zones under SCC 30.22.100.

SECTION III: Recommended Reasonable Measures

The reasonable measures listed below are recommended for further analysis and possible implementation as required. These measures are designed to improve the quality of infill development, to provide for a wider range of housing sizes and types, and to increase residential capacity inside the UGA.

A. Implement the Comprehensive Plan through County-initiated Rezoning of Urban Residential Land to Match the Higher End of Densities Contemplated by the Future Land Use Map (FLUM) Designations.

This measure calls for legislative rezoning of those areas with medium and high density FLUM land use designations that are currently zoned R-9600 or R-8400 to higher density classifications, such as Low Density Multi-Residential (LDMR) and Multi-Residential (MR). By eliminating the need for applicants to apply for a rezone when seeking development at densities intended in the plan, this measure would facilitate higher density development at a lower cost to developers.

B. Mandate Higher Minimum Residential Densities in Multi-family Zones.

By mandating higher minimum net residential densities on parcels designated for medium and high density residential development, the average density of residential development may be increased. Current code sets the countywide minimum net density at 4 units per acre in all residential zones. The existing minimum net density is the same throughout the UGA including multi-family zones, chapter 30.23.020(2) and (3) SCC. Setting minimum densities at 8 units per acre in the Urban Medium Density Residential (UMDR) areas and at 12 units per acre in the Urban High Density Residential (UHDR) areas would assure that those lands are developed at the appropriate densities and with appropriate housing types.

Actual development experience in UMDR and UHDR indicates that development already approaches the maximum allowable density. Raising the minimum assures that a change in market conditions will not result in a loss of potential capacity.
C. Design Standards

Revisions to multi-family zone (LDMR and MR) design standards, including setbacks, building heights, and parking and landscape requirements could improve livability of higher density urban development in appropriate locations. Urban design standards help achieve attractive development that is compatible with the character of the surrounding area.

The Snohomish County Tomorrow process has been used to analyze the transition between cities and their unincorporated UGAs. The CPPs now include OD-9, which provides for the “... orderly transition of unincorporated to incorporated areas within UGAs. Such policies may include urban design standards or guidelines.” The County intends to develop improved design standards for UGAs as part of the implementation program for the Comprehensive Plan update.

D. Increase Allowable Residential Densities

The Preferred Alternative Future Land Use Map incorporates changes in land use designations within the UGAs that will allow higher residential densities. Areawide rezones will be submitted to implement these designations.

Conclusion

The Relationship of Reasonable Measures to the 2005 Comprehensive Plan Update

As a result of the reasonable measures adopted by Snohomish County prior to 2002, it has been possible for the County to put forward a preferred land use alternative that expands the UGA by only 3.4 square miles, while accommodating significant population and employment growth over the next 20 years. The area of expansion for residential uses was determined after a careful consideration of Reasonable Measures from the adopted list.

The unincorporated portion of the Southwest UGA will be able to accommodate its 2025 initial growth target with no new capacity from UGA expansion. This results from implementation of capacity enhancement measures during the preceding several years, including redesignating a number of areas for higher density residential development to encourage greater infill.

Based on a draft analysis, additional capacity created throughout the existing countywide unincorporated UGA as a result of new reasonable measures is about 18,000 persons, compared with new capacity through UGA expansion of about 12,000 persons. The total additional capacity for 2025 in the unincorporated UGA as recommended is about 30,000 persons greater than the projected population capacity under the No Action Alternative.4

4 Draft capacity estimates based on the October 2004 PDS draft preferred alternative. Minor changes to that map are reflected in the April 2005 preferred alternative. The No Action Alternative (Alternative 1) 2025 population capacity for the unincorporated UGA was calculated as 323,941 for the Draft Environmental Impact Statement for the Snohomish County GMA Comprehensive Plan 10-Year Update published in May 2004. It was derived by extending the time horizon for development from 2012 as used in the 2002 Growth Monitoring/Buildable Lands Report. That report included two capacity scenarios. Scenario A showed a capacity of 304,036 within the unincorporated UGA through 2012, while Scenario B showed a capacity of 281,358. Please consult the Draft UGA Land Capacity Technical Report for more detailed information on this topic. The capacity figures shown in the Reasonable Measures report will be
A portion of the UGA expansion consists of large parcels of land for employment in response to new economic development challenges. These UGA expansions are needed to create contiguous areas large enough to attract large-scale employers in support of countywide economic development goals contained in the Economic Development Element of the GPP. An analysis of available large tracts for employment use showed a very small number of such sites. Fewer than 2% of all parcels inside the existing unincorporated UGA with remaining employment capacity are 20 acres or larger. In contrast, the expansions in Wellington Hills and North Marysville add contiguous sites of approximately 120 acres and 400 acres respectively to the UGA.

A comparison of employment capacity between the counties that completed a Buildable Lands analysis showed that while Snohomish County had almost no excess employment capacity relative to projected need, each of the other counties had a capacity two to five times greater than employment projections. In light of those figures, these UGA expansions are necessary for Snohomish County to be competitive in attracting major regional employers.

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5 Data from Snohomish County Planning and Development Services April 2001 parcel inventory.
## Appendices

### Appendix A - Status of all measures that increase residential capacity and selected others recommended for consideration by unincorporated Snohomish County

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<thead>
<tr>
<th>Measures</th>
<th>Implemented?</th>
<th>Comments</th>
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<td>Permit Accessory Dwelling Units (ADUs) in single family zones</td>
<td>Yes</td>
<td>See Section 2A of the report.</td>
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<td>Provide Multi-Family Housing Tax Credits</td>
<td>Yes -- State Program</td>
<td>See Section 2B of the report.</td>
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<td>Provide Density Bonuses</td>
<td>Yes</td>
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<td>Transfer/Purchase of Development Rights</td>
<td>Yes</td>
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<td>See Section 2C of the report.</td>
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<td>Allow Duplexes, Townhomes, and Condominiums</td>
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<td>Allow Small Residential Lots</td>
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<td>Encourage Infill and Redevelopment</td>
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<td>Enact an inclusionary zoning ordinance for new housing developments</td>
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<td>Encourage the Development of Urban Centers</td>
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<td>Allow Mixed Uses</td>
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