



City Council - Planning Commission Joint Special Meeting Agenda

Tuesday, December 10, 2024 at 5:00 PM

9103 E Frederick Ave.

www.youtube.com/@cityofmillwood

- 1. CALL TO ORDER & ROLL CALL**
- 2. 2026 PERIODIC UPDATE PRESENTATIONS**
 - a. [Community Survey Results Summary](#)
 - b. [Millwood Land Capacity Analysis \(LCA\) Report Overview](#)
- 3. COUNCIL/COMMISSION REMARKS**
- 4. ADJOURNMENT**

File Attachments for Item:

a. Community Survey Results Summary

Joint City Council & Planning Commission Meeting 12/10/24

*Periodic Update Community
Survey Results Summary*






Comprehensive Plan & Development Regulations Periodic Update 2026









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Latest News

- Public Works
- City Council Updates
- 2026 Periodic Update**
- Upcoming Office

Meeting Agendas & Minutes

2026 Periodic Update

[Click here to view the webpage for the 2026 periodic update to the City Comprehensive Plan & Development Regulations.](#)

Hard copies are also available at City Hall or contact City Hall at 509-924-0960 to have one mailed to you.

Please Complete Community Survey

Go to Periodic Update webpage for a link to complete the survey
or follow survey QR code with your mobile phone!



[Click Here to Complete the Community Survey!](#)

(<https://forms.gle/GZiebm4TC3heDV7A>)

Community survey hard copies are also available at City Hall or contact City Hall at 509-924-0960 to have one mailed to you.

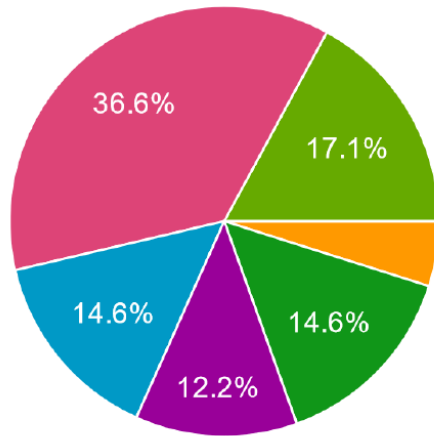
[Click here to view the Periodic Update - Community Survey flyer](#)

Available September 12th - October 23rd

- Advertised at Millwood Daze
- Sent out by email to interested parties (sign up sheet) & community groups
- Posted on community boards
- Periodic Update webpage
- Social media posts & reminders
- Flyer in October water bill
- Included in City newsletter
- Hard copies available at City Hall - mailed out as needed

How old are you?

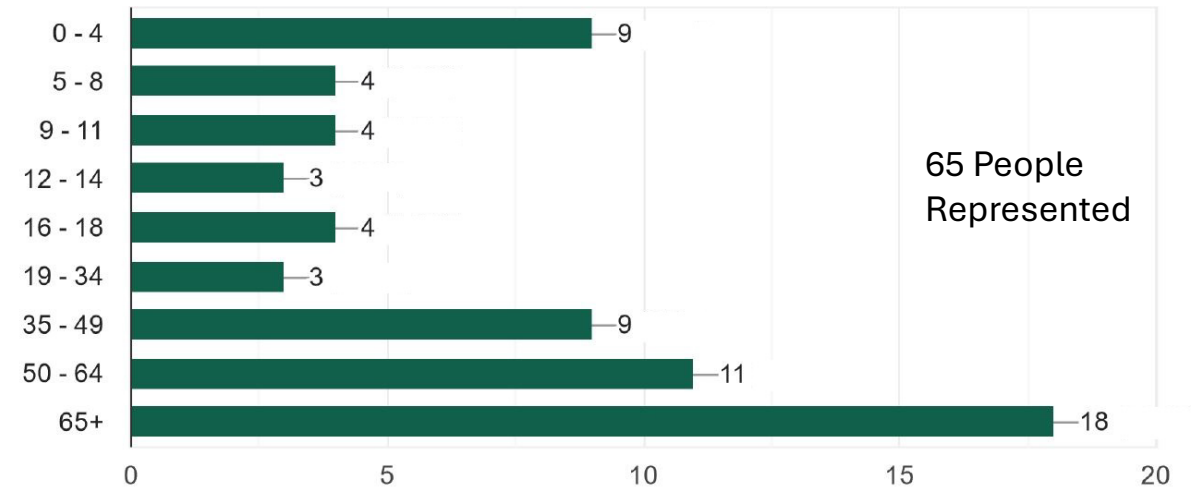
41 responses



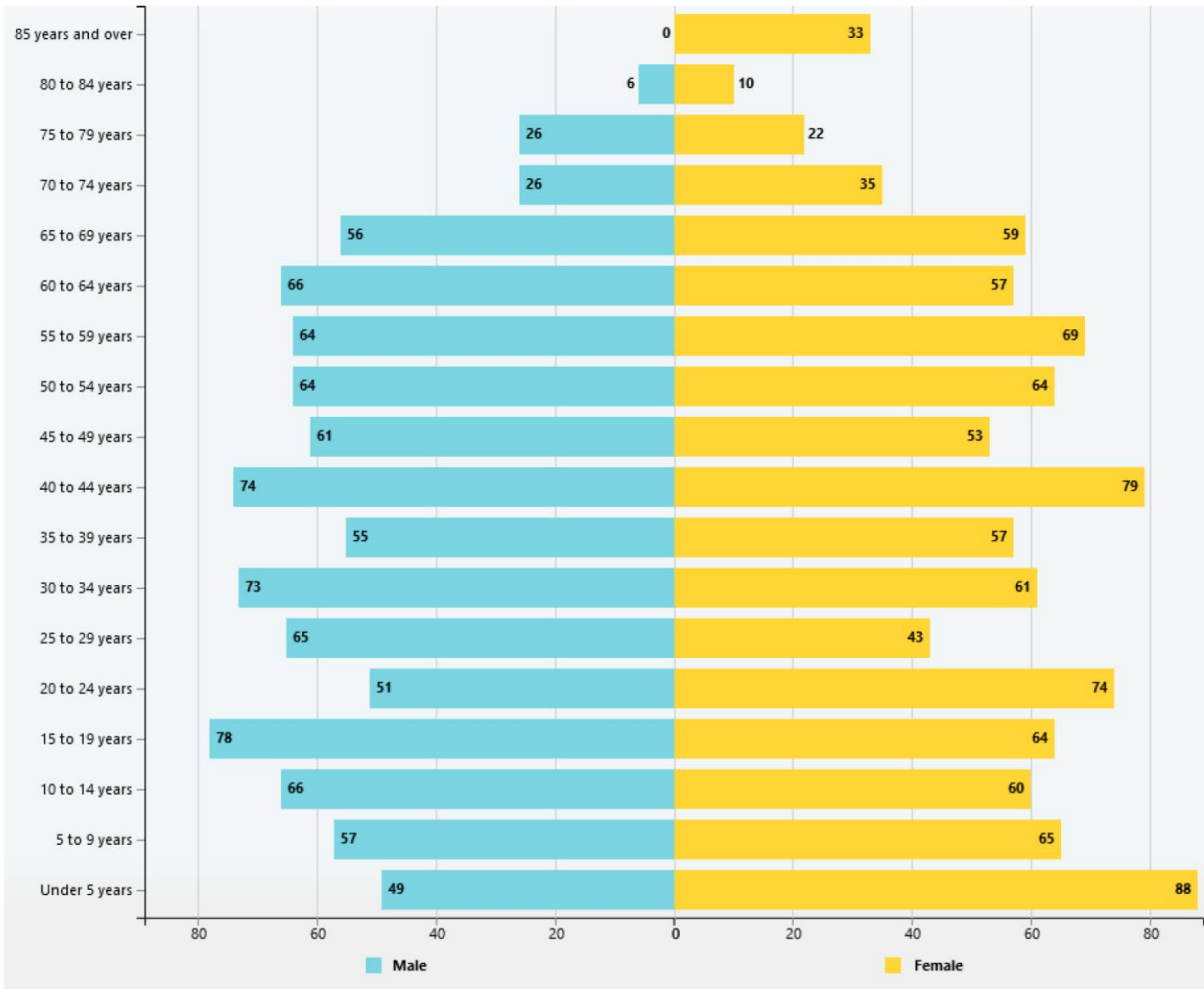
- Under 18
- 18 - 24
- 25 - 34
- 35 - 44
- 45 - 54
- 55 - 64
- 65 - 74
- 75+

Which of the following age categories make up your household (including yourself)?

41 responses



Community Survey Response to Millwood Demographics Comparison



Source: 2022 American Community Survey (ACS) 5 Year Estimates

Category	Millwood 1,930	Survey 41 Respondents
Seniors 65+	14.1%	53.7%
55 - 64	13.3%	14.6%
45 - 54	12.5%	12.2%
35 - 44	13.7%	14.6%
25 - 34	12.5%	4.9%
24 & Younger	33.8%	0%

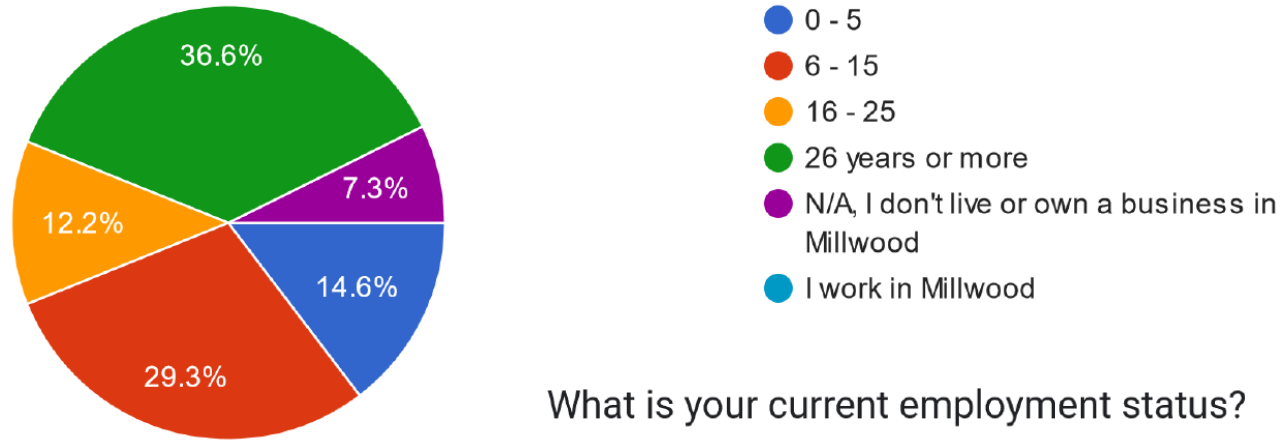
Responses were heavier from Seniors 65+ and lighter from age 34 or younger compared to Millwood demographics; however all age groups were represented in households.

Survey was representative of Millwood.

Imagine Millwood, Stakeholder Interviews, etc. will also be utilized to gather input

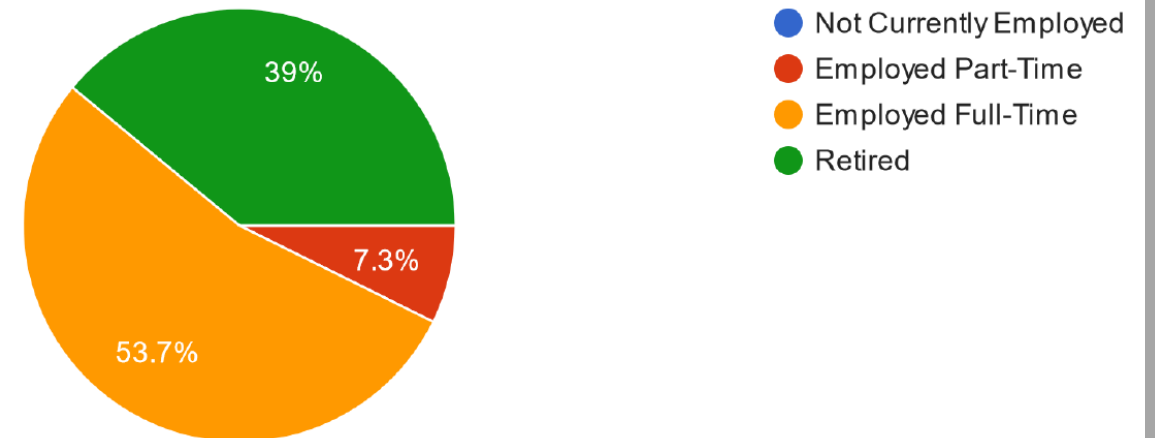
How many years have you lived or owned a business in Millwood?

41 responses



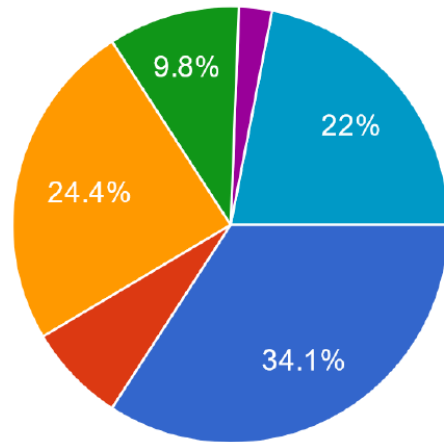
What is your current employment status?

41 responses



Where does your work primarily take place?

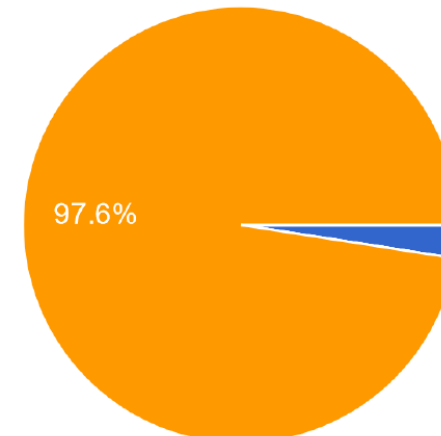
41 responses



- N/A - not currently employed or retired
- Within City of Millwood
- Neighboring Municipalities (Spokane Valley, Liberty Lake, Spokane, etc.)
- Within Greater Spokane County (15+ miles away from home)
- Outside Spokane County
- From home / remote work, including hybrid

What is your primary mode of transportation?

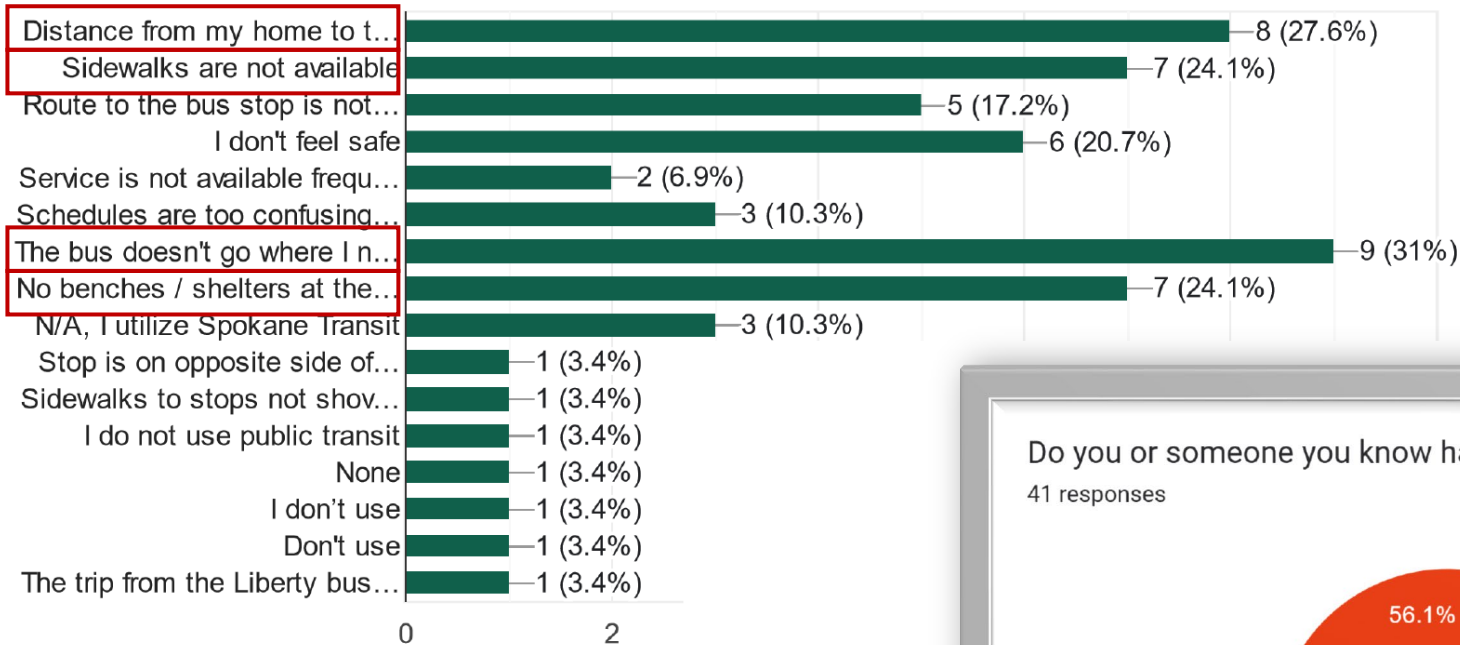
41 responses



- Walking
- Biking
- Personal Vehicle
- Rideshare
- Public Transit

Fixed route public transit is available in Millwood through Spokane Transit. Do any of the following make it difficult to utilize public transit? (Check all that apply)

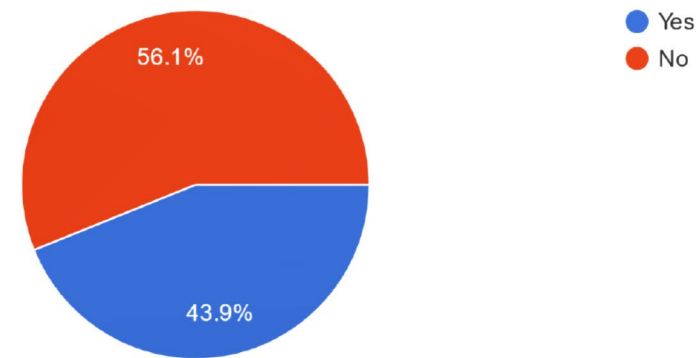
29 responses



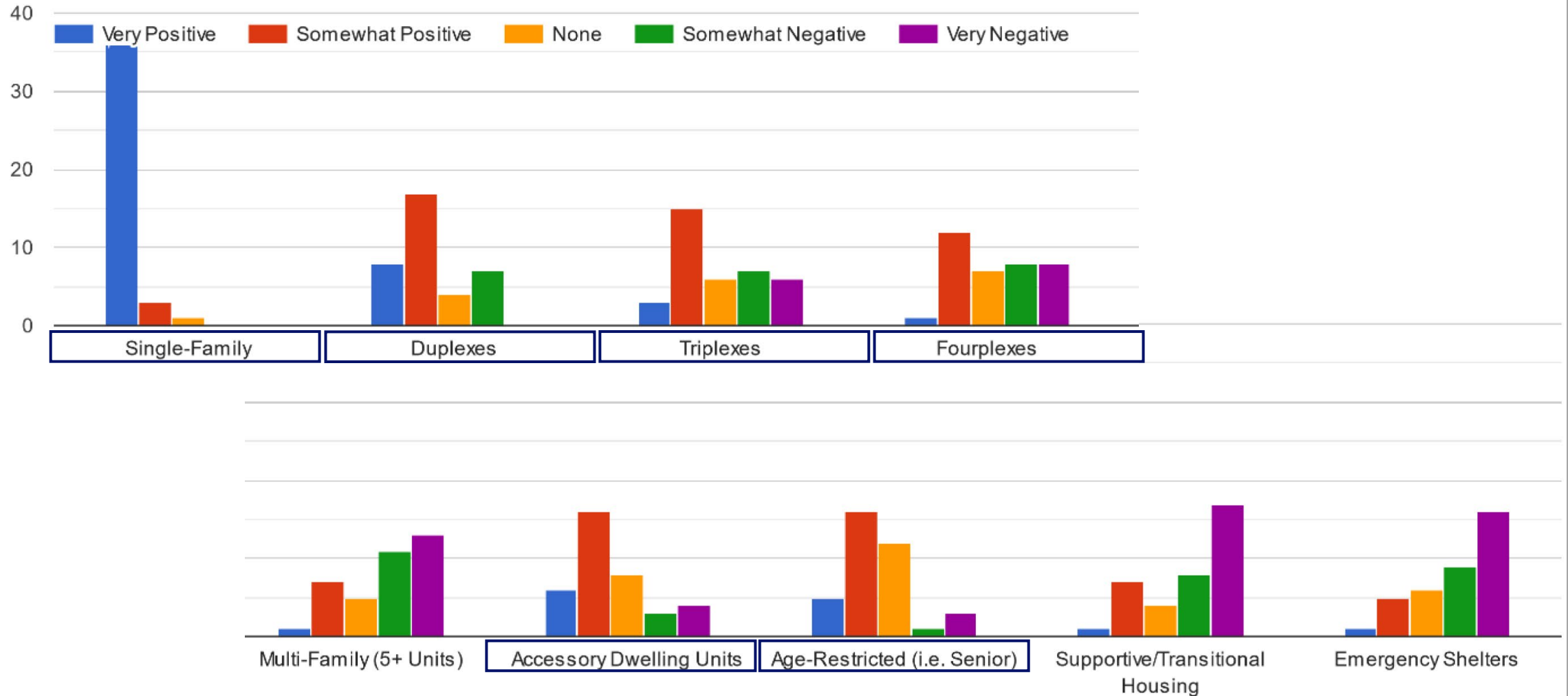
1. Bus doesn't go where I need to go
2. Distance from my home to the nearest bus stop is too far
3. Lacking infrastructure - no sidewalks or no benches / bus shelters at the bus stop

Do you or someone you know have concerns about housing affordability in Millwood?

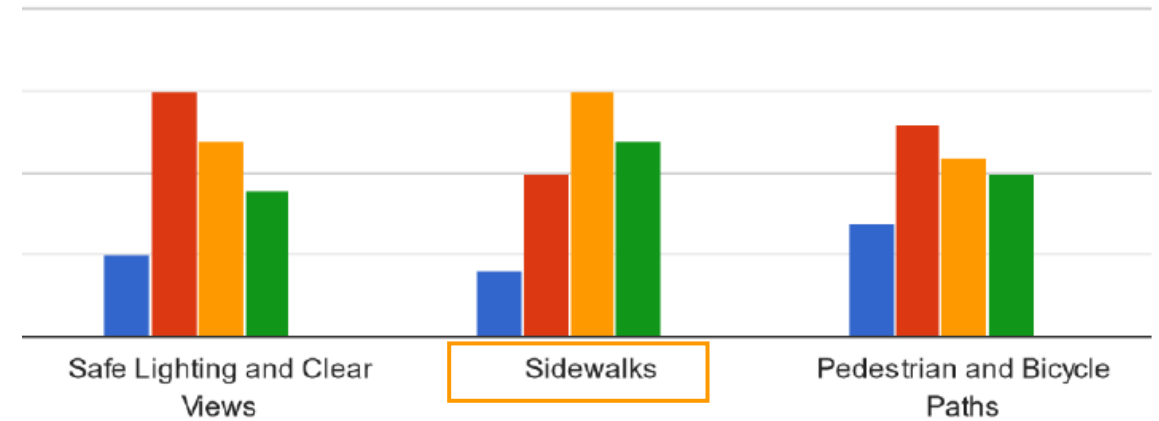
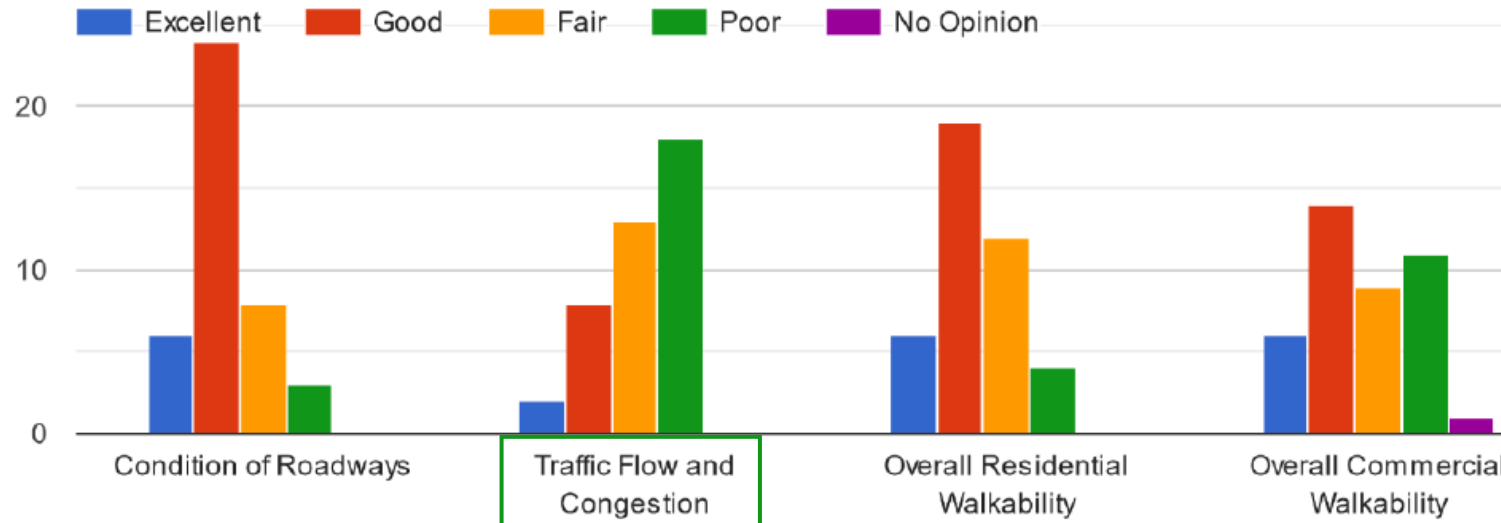
41 responses



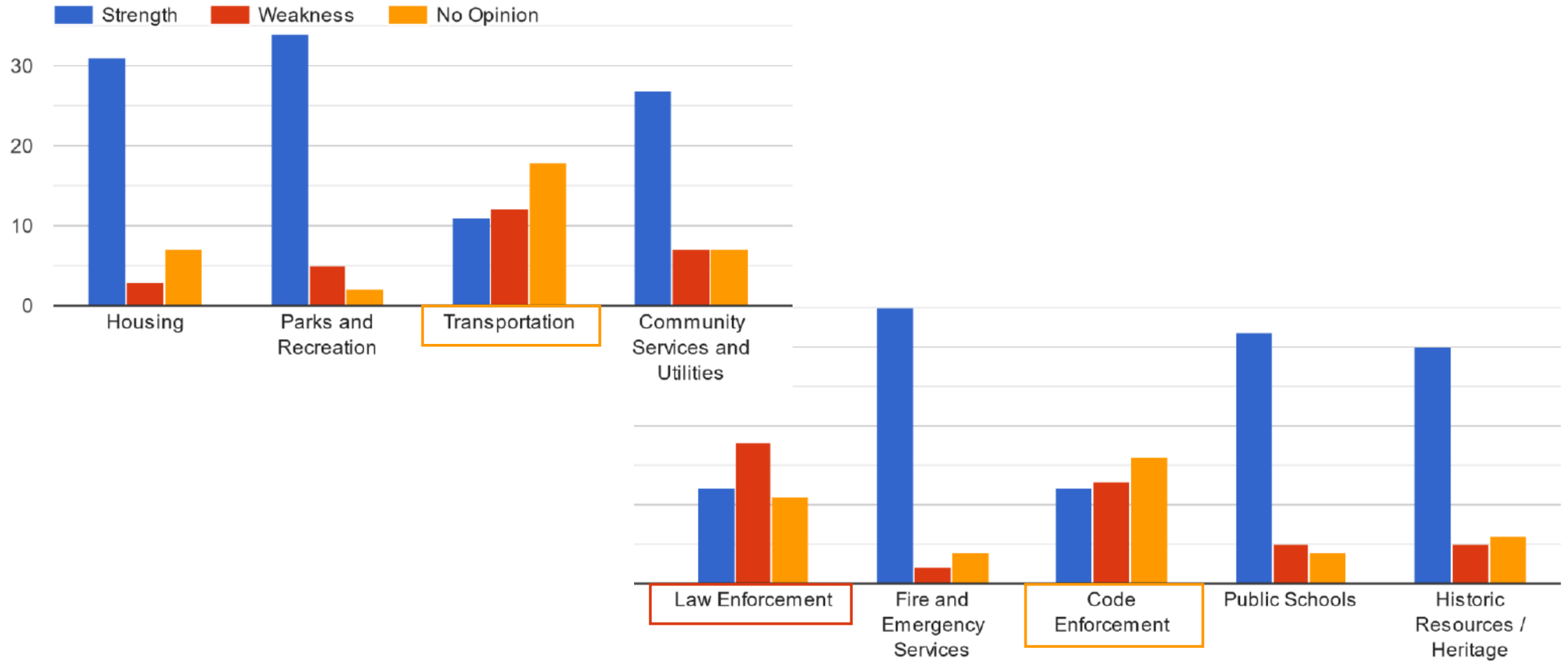
WA State legislation now requires the City of Millwood to plan for multiple housing types and incomes. What impact do you believe the following residential development types have on Millwood?



How would you rate the quality of the following transportation conditions?

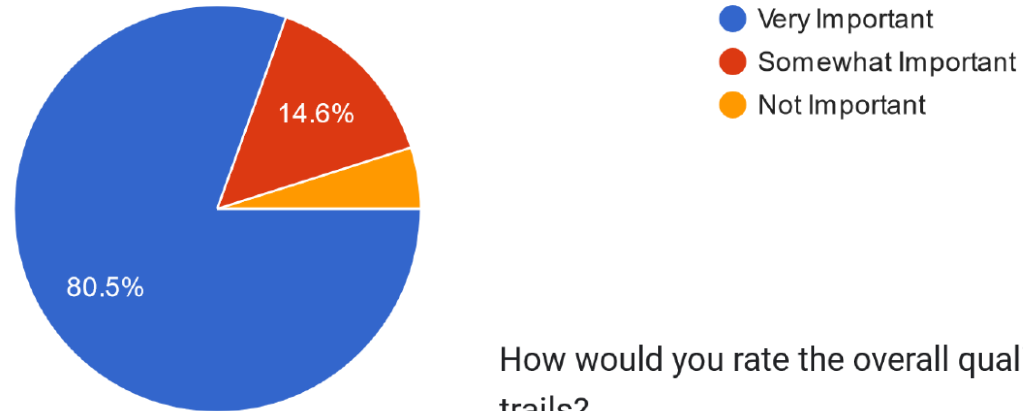


Which of the following are Millwood's strengths and weaknesses?

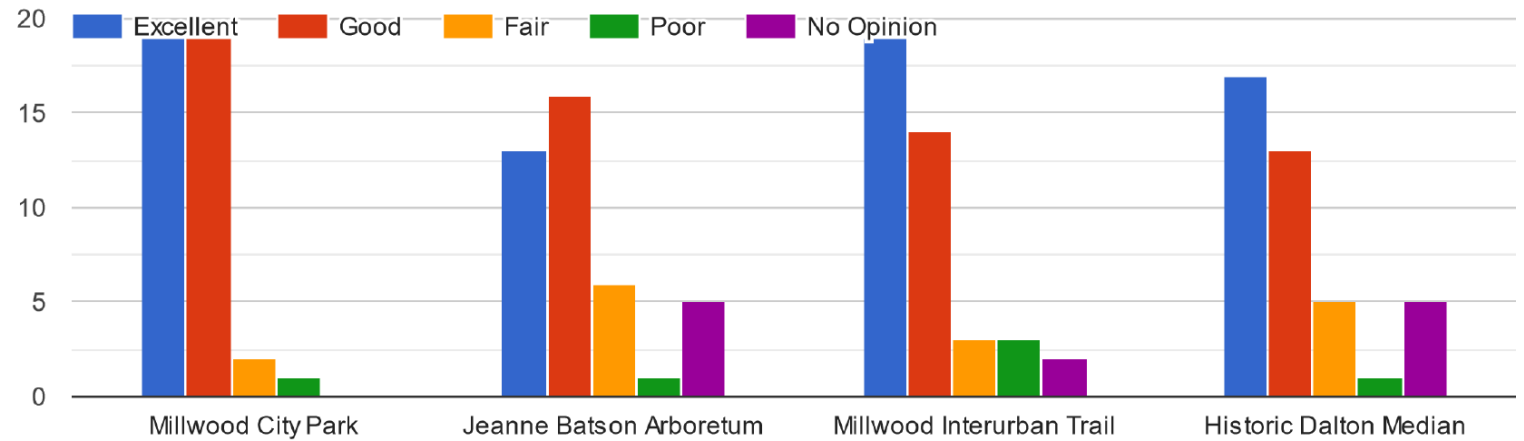


How important is access to parks, recreation, open space, and trails within the City of Millwood?

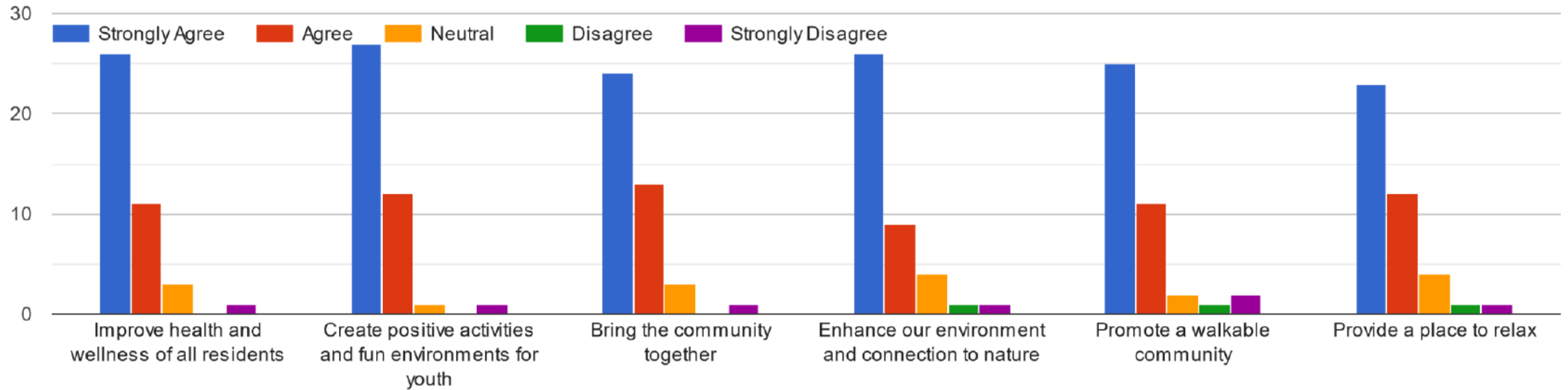
41 responses



How would you rate the overall quality and maintenance of City of Millwood parks, open space, and trails?

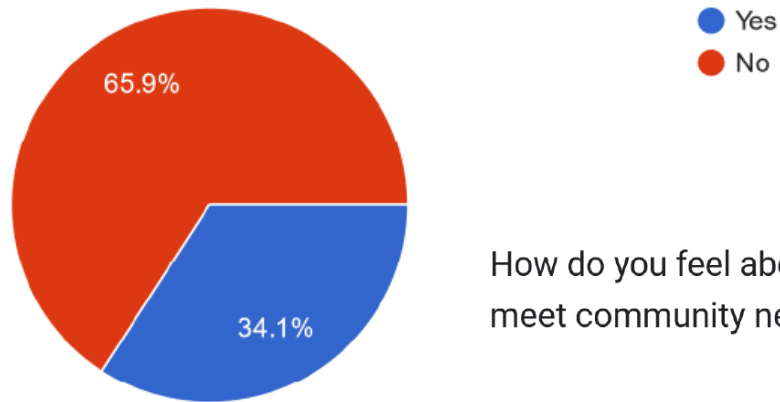


What are the most important things Millwood parks, recreation, open space, and trails can do for our community?

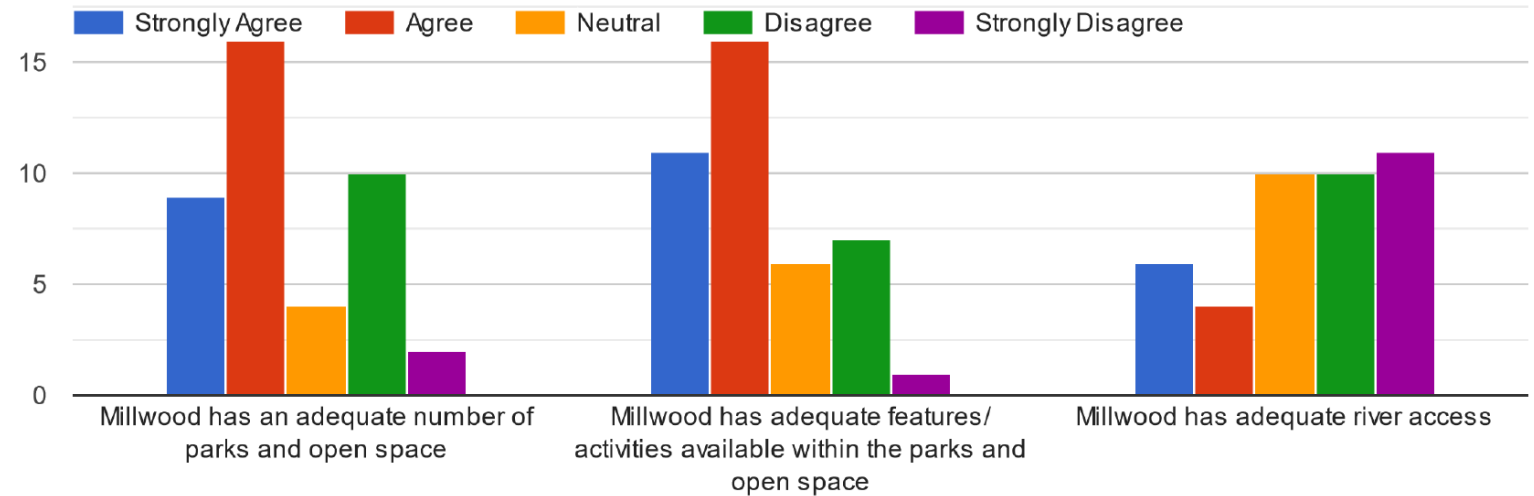


Do you encounter any barriers to individuals with disabilities accessing Millwood's parks, recreation, open space, or trails ?

41 responses



How do you feel about the following statements about how well Millwood's parks and open space meet community needs?



Respondents were asked to expand upon their answers to the community needs question and the following is a summary of the responses by topic and majority opinion:

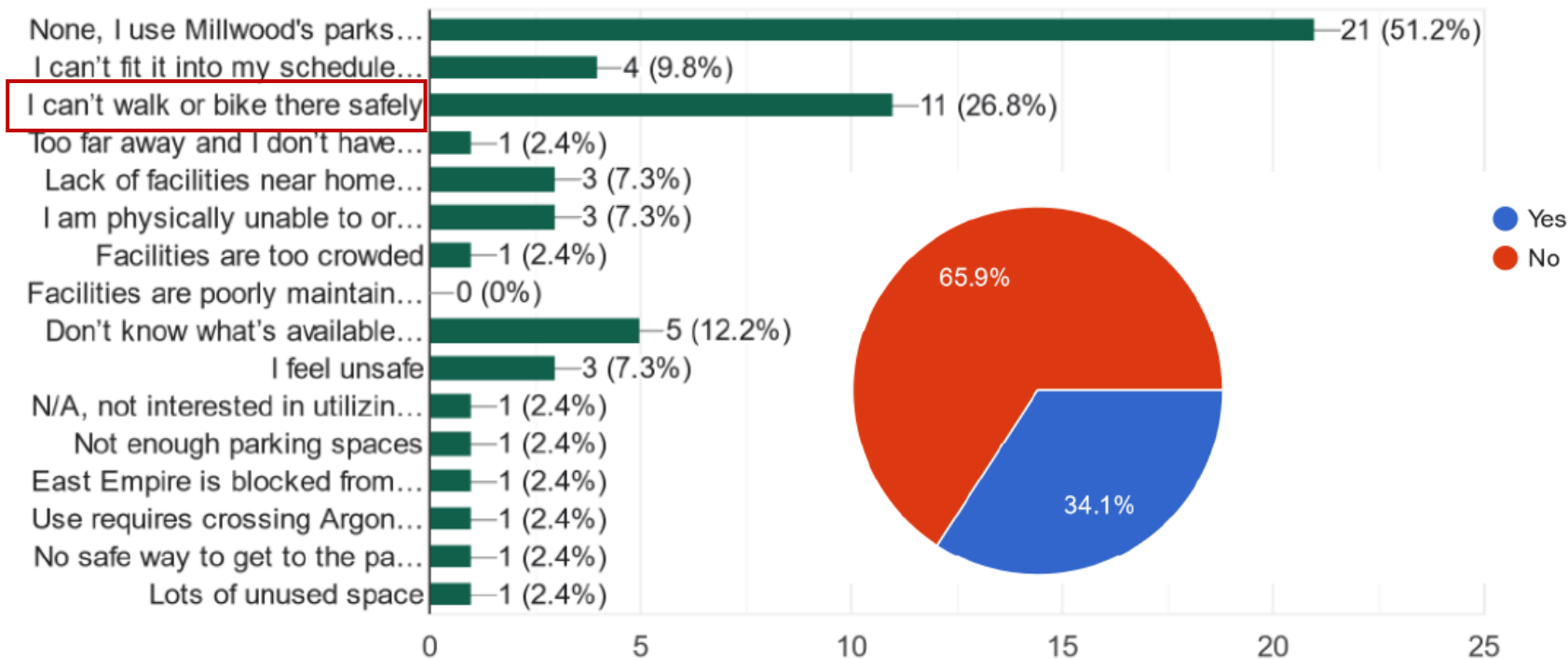
- There is only one park and playing at the school playgrounds isn't a good daytime option unless it is summer. The park is nice but it has limited parking and no handicap accessibility. Parts of the park could be updated and used for more activities / amenities (i.e. pickleball courts, space for food trucks at events, space for performances, adding power outlets, etc.). The current City Park has gotten smaller over the years for construction of the city shop building, the fire station, etc. that have all taken land without adding replacement park land.
- The river is an important Millwood feature yet there is no direct public access and very minimal visual access to the river for anyone that does not own a house on the river, we need clean and safe river access for Millwood residents. We are a City bordered by the Spokane River and the city owns property on the river. Residents should have access to small walk-to neighborhood river parks to launch kayaks, paddle boards, and small canoes, and enjoy the river views.

There were also individual responses about selling the city's lots on the Spokane River / not creating river access, not adding more walkability, having the city work on maintaining / beautifying trail connections between residences, issues with residents / animal control near parks, needing a way to cross Argonne on the Centennial Trail, and the need for sidewalks and streetlights throughout the whole community (especially the east side of Millwood), as well as other element topics such as traffic and transit.

The majority of respondents do not face barriers to visiting parks and open spaces or participating in activities; however some do experience barriers such as not being able to walk or bike there safely and 34.1% do encounter barriers to individuals with disabilities accessing Millwood's parks, recreation, open space, or trails.

What barriers do you face when trying to visit parks and open spaces or participate in activities, or why would you choose not to use Millwood's parks, recreation, open space, or trails?

41 responses



"The Farmers Market is on the grass, making it inaccessible to those in wheel chairs. It's one of the best Farmers Markets in Spokane"

"Hard to get to farmers market with walkers, canes for elderly or disabled"

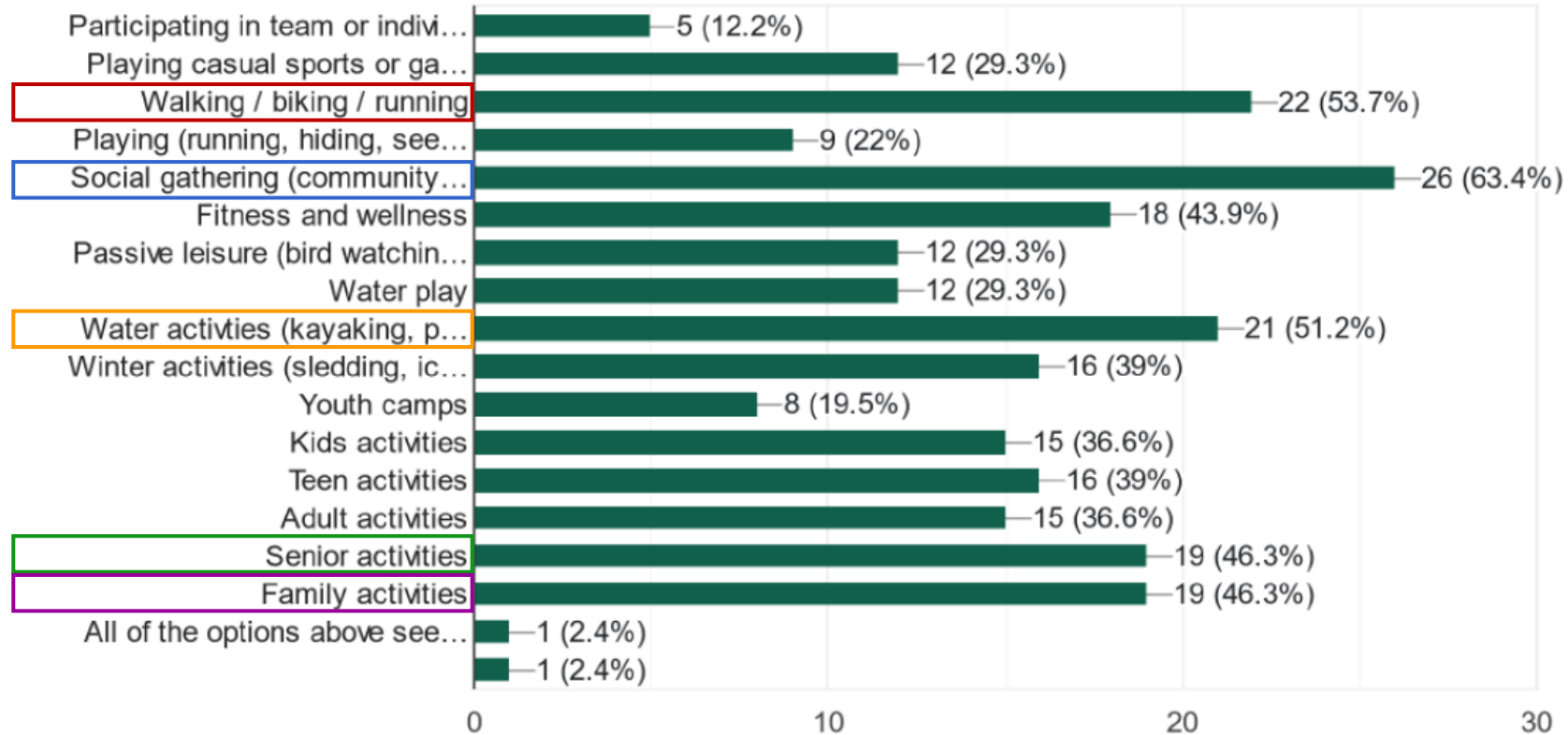
"Not enough hard surfaces"

"While my family does not personally, I could see it being difficult for some to get through the rocks at the Millwood City Park playground"

"Getting from parking on Frederick down into the park is too steep for persons using walkers, canes or wheelchairs"

What activities would you like to see more of in Millwood? Check all that apply.

41 responses

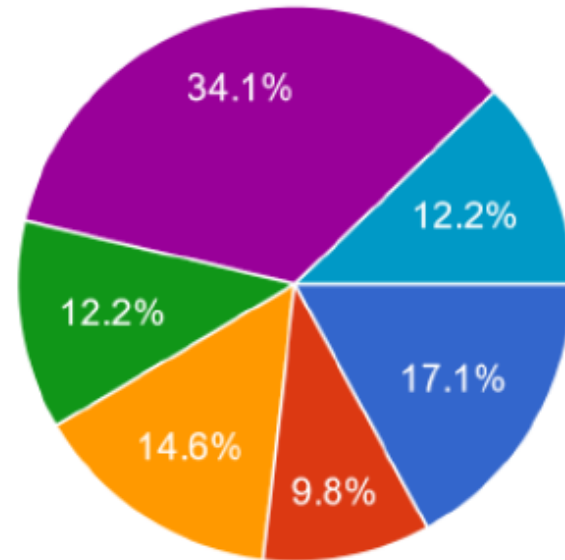


Concerning Millwood activities, the top five activities that respondents would like to see more of in Millwood are social gatherings / community events, walking/biking/running opportunities, water activities (kayaking, paddle boarding, etc.), senior activities, and family activities.

Developing river access is the most important thing the city can do followed by upgrading facilities/amenities at existing sites like Millwood Park. Although walking / biking / running received the second highest response to “what activities would you like to see more of in Millwood,” adding more trails / better trail connectivity tied for fourth place on most important improvement.

What is the most important thing the City could do to improve Millwood's parks, recreation, open space, and trails?

41 responses



- Upgrade facilities/amenities at existing sites (i.e. Millwood City Park)
- Build additional facilities at new locations
- Provide additional activities for all ages and abilities
- Add more trails / better trail connectivity
- Develop river access
- No improvement is needed



MILLWOOD PARK REIMAGINED

Based on previous feedback for Millwood Park Reimagined, the following amenities/features have been proposed for City Park. Please rank each project by priority (1 is highest priority & 10 is lowest priority)

Section 2, Item a.

The results derived were as follows:

1. New Playground (ADA Compliant)
2. Wading Pool / Splash Pad (ADA Compliant)
 - Tiered Hard Surface Plaza for Gatherings, Events, etc.
 - Additional Parking
 - New Tennis / Pickleball Courts
 - Picnic Shelters
 - Wider Multi-Use Paths (ADA Compliant)
 - Walking Paths (ADA Compliant)
 - New Basketball Court / Sport Court
 - Additional Bathroom

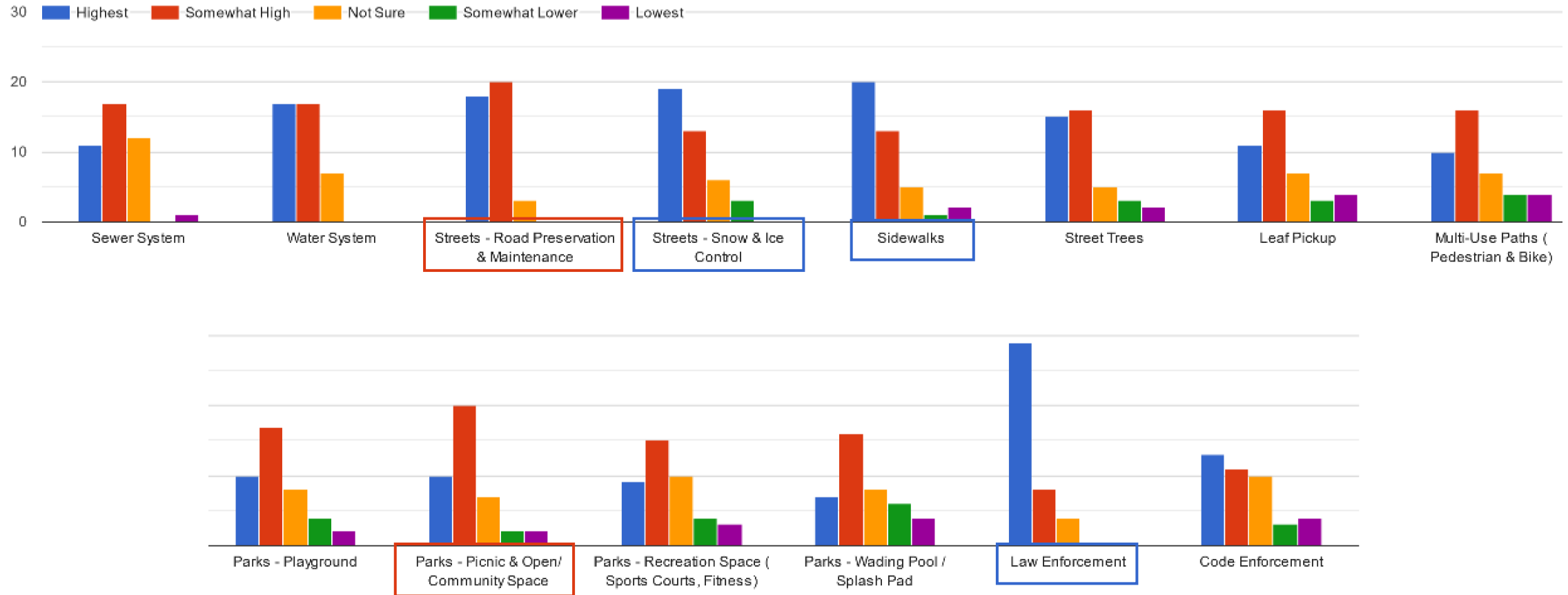
New Playground (ADA Compliant) and Wading Pool / Splash Pad (ADA Compliant) were clearly the highest priorities while the remaining were closely ranked.



Are there any other parks, recreation, open space, or trails projects that you believe should be a priority?

- “Plaza on Dalton next to Argonne for winter festival and other events”
- “Space for food trucks - around town, Events (power for performance), Space to put in at river”
- “River access” “River accessible”
- “Develop local river access for launching paddle boards and kayaks that is designed for walkable (no parking or facilities). Provide place for residents to sit and enjoy views of the river and wildlife”
- “Develop local river access for residents that they can walk to. Small parks for access to the river. We already own the properties - use them”
- “River access - both visual and physical with paddleboard, kayak and canoe launching facilities”
- “S. Riverway by the boating ramp, a small park”
- “Park on East South Riverway”
- “The property on South Riverway should be developed to offer River Access for small river craft as well as picnic area and small sports courts, as space allows”
- “Empty lots that city of Millwood owns”
- “Should decide on what to do with the river property”
- “Building nature space”
- “Would love to see a better splash pad”
- “Walking path around the park, upgraded water facility and pickleball courts”
- “No. Millwood already has a lot to offer”
- “None: Ok as is” “N/A”

How would you prioritize the following potential infrastructure projects / improvements or City services that the City of Millwood might need to plan for in the next 20 years?



Based on your responses to the priorities question above, why did you prioritize your highest and your lowest potential infrastructure projects / improvements or City services how you did?

- “Millwood is very well run. Keeping it peaceful and beautiful should be a priority”
- “Maintain high quality of basic city services and assets”
- “Highest choices based upon public safety. Lowest choices because either these will currently be unsafe to access, space currently lacking, or just plain frivolous”
- “Need safe secure space for people to live” “Health and safety”
- “Water, sewer, sidewalks, etc are necessities to keep the community moving and functioning. While parks, etc are lovely, these are amenities”
- “I think we need to completely replace the old water supply lines and obtain better police protection. Everything else is secondary or tertiary”
- “Highest walking paths”
- “Appears that we have an established water and sewer system so not sure we need to spend a bunch to improve it - just maintain what we have. We should have river access and better access to the Centennial trail system. Our trail doesn't go anywhere - we should have spent the resources to connect the the Centennial trail with a safer connection. Crossing Argonne and the Argonne bridge is a huge barrier to connecting to the trail”
- “Millwood lacks sidewalks in many areas and on many streets connecting to Argonne or other High Traffic areas. This forces people to drive rather than walk for safety issues. Many street trees have been removed over the years and not replaced, others may need replacing. Increasing the number of street trees should be a high priority. As I recall, most of the sewers were built or replaced in the 1990s. The sewer system should not be a major concern for at least another 20 years.”

If you were given \$10 total to spend on the following, how would you spend it? Please double check that your total adds up to \$10.



What do you think is the most critical challenge facing Millwood in the next 20 years?

- Crime rates, safety, keeping the addicts and riff raff out, keeping both the residential and business districts safe and accessible for local traffic and pedestrians, crime in our neighborhood, homeless and theft
- Traffic and trains, traffic congestion (Argonne / at Euclid), taming the traffic on Argonne (both speed and volume) and controlling cut-through traffic on Liberty and Empire, managing growing Argonne traffic, railroad, paper mill congestion
- TRAFFIC! Overpopulation of the area
- Taming Argonne traffic. Keeping Argonne the width it is now. Keeping all our cross walks and beef them up with lights and signs. The Central Business District is a pedestrian active area, need it marked as such with lighting, signage, etc.
- Updating Argonne, water lines and expanding the commercial area to create more for the people that live around the area. Condos or higher end townhomes to be built
- Growth, the growth with no place to build multi-housing the state wants, which will create more citizens and more traffic; put more influx on the water and sewer
- For residents, property taxes are very high in comparison. It makes it difficult to consider this area for living. For the city, I believe it will be growth and finding the level ground between providing affordable housing and not diminishing the feel, aesthetics, home values, etc. with a bunch of apartments
- Lack of housing options, multi units going in and compromising community
- Pressure to cram housing into small spaces and uninformed residents
- Use limited tax base to cover current level of utilities & services. Likewise, improvement and repair of roads, street trees and park/open spaces

What do you think is the most critical challenge facing Millwood in the next 20 years? (continued)

- We have an established park that we could make minimal improvements. Playgrounds appeal to small segment of society - young kids. Instead, let's focus on small parks that can be walked to with river access and benches to view the river. The City already owns the property so this is a much better use of resources. Vehicles are using our arterials to avoid Argonne - let's put resources towards speed humps and raised crossed walks to slow traffic and make walking safer for everyone.
- Enhancing the charm of Millwood
- It is critical to keep Millwood's special historic character and healthy livability while conforming to state regulation that requires more dense housing. Millwood has an invaluable National Historic Register listed Historic District. Millwood also is a community of modest sized houses lived in by friendly, caring residents who look after each other. People walk the residential streets a lot, smile and nod and often stop to chat with neighbors. We are a community with many "Blue Zone" type characteristics that should be nurtured, enhanced and built upon but which could be easily disrupted. The health, wellbeing and life quality of current and future residents depend on how carefully we can shape any future growth
- City Council celebrating and welcoming resident input, management, the people working in City Hall Should live in the town of Millwood, reasonable planning, innovation- ability to get information to citizens in the community in a timely manner (use email social media, etc.), stop raising rates and building in bureaucracy
- Lack of residents' ethical sense
- We need new small businesses

Do you have any other comments or ideas you would like to share?

- “We have only lived in this area for two years and have already had three property crime incidents and there have been two deadly shootings nearby”
- “Some road about”
- “No turn lane on Argonne. The project is a waste of money and had been mostly hidden from the citizens. Put it to vote and let the people speak. This isn't the mayors decision.”
- “The answer to the problem of Argonne’s traffic should not be allowing everyone to go faster in much narrower and more congested lanes.”
- “Make the signals on Argonne at Empire and at Liberty - 1 direction per cycle. Then turners wouldn't impede others and cause drivers to cause accidents trying to jump out of their lane.”
- “1) Mitigating the emotional and physical damage done to Millwood by the 2025 Argonne "Congestion Relief" Project will be a special challenge. Physically widening the road by adding another strip of pavement down the center while narrowing crucial areas of pedestrian/bike walkway make it less safe for pedestrians to reach parks and businesses. 10 valuable parking spots will be lost. The city used eminent domain against our oldest business. Given the trains and current and projected traffic patterns, "congestion relief" is unlikely. Sadly it is an expensive step backwards from where Millwood should be going. Also, since the city was not open or communicative with its businesses and citizens on this project, a lot of damage has been done to everyone's attitude. As a result, it may be very difficult to get the kind of community support and participation that re-visioning the next 20 years of comprehensive planning in challenging times deserves. 2) It is important not to completely leave Millwood's historic resources and identity out of the comprehensive plan discussion.”

Do you have any other comments or ideas you would like to share? (continued)

- “The Argonne Project should focus on pedestrian safety versus getting traffic to move faster through our town. Seems like the engineers (Adam was helpful but the other guy should be fired) focused on traffic congestion and pedestrian safety was an afterthought. Make our City more walkable with river access for local residents - not a regional park like Boulder Beach.”
- “Argonne as a boulevard sounds charming.”
- “Have safe Millwood river access for paddle boards/kyaks; bring the Millwood Farmers Market back to Dalton Ave. Millwood City Hall and Governance needs to have an appreciation/awareness/respect of the value and importance of our heritage and Historic District. Possibly training and/or education in the value of what we have here.”
- “Millwood needs to protect its Historic Fabric, develop its river property, and place more emphasis on Pedestrian safety and enjoyment. The Automobile and "Through Traffic" needs to be a lower priority. Words used should include lower speeds, less traffic, better street lighting, better crosswalks, better sidewalks, more sidewalks, more pedestrian trails, direct river access, more river visual access, more street trees, better tree canopy, protected Historic Buildings, protected Historic sites., better ADA access, etc.”
- “Vibrant historic district - businesses that can thrive and not have to close, better parking around historic area”
- “Although this survey asked very few questions about it, history is an important part of Millwood's "brand", ambience and quality of life.”
- “Need more progressive mindset to growing commercial ease of business and growth”

Do you have any other comments or ideas you would like to share? (continued)

- “Project ID buses idling in front of houses for hours at a time when Millwood Presbyterian Church has a large empty parking lot for Buses to park in.”
- “Stop raising rates - if you want revenue install red light cameras and speed cameras.”
- “When did we ever vote for code enforcement? You add this stuff and we never vote on it You people probably can’t even remember how come we lost our fire station but I could explain that to you, but you probably don’t live in the town of Millwood so you would have no idea what’s really going on...”
- “I lived in Millwood for years before moving to the Valley, and prior to that I lived in Shadle. Millwood stands out like a bright and shiny star in Spokane. Excellent leadership and City managing!”

File Attachments for Item:

b. Millwood Land Capacity Analysis (LCA) Report Overview



Comprehensive Plan & Development Regulations Periodic Update 2026



Land Capacity Analysis Report



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INTRODUCTION

The City of Millwood is undertaking a periodic review of its Comprehensive Plan and applicable Development Regulations. As part of this Update, the Growth Management Act (GMA) and Countywide Planning Policies for Spokane County (CWPP), require local governments to complete a Land Capacity Analysis (LCA). This report meets the requirements for the Land Capacity Analysis Methodology For Spokane County, adopted in March 2024, which augments the Washington State Department of Commerce (DOC) Urban Growth Area Guidebook: Reviewing, Updating and Implementing Your Urban Growth Area - Chapter 5: Land Capacity Analysis and Buildable Lands Program for Urban Growth Areas.

Each jurisdiction within Spokane County, including the City of Millwood, was responsible for developing its own land quantity analysis report. The land quantity analysis reports from each jurisdiction are intended to provide quantitative information regarding the theoretical ability of existing urban areas to accommodate additional residential and nonresidential growth which in addition to other information, will be utilized by the Steering Committee of Elected Officials (SCEO), the Spokane County Board of County Commissioners (BOCC), each jurisdiction, and the public in the course of designating and adjusting Urban Growth Areas (UGAs).

The primary purpose of this land capacity analysis report was to analyze residential, commercial, and industrial growth capacity within the City of Millwood and includes the following information:

- Total number of existing platted lots in the City of Millwood.
- Total number of lots in approved preliminary plats in the City of Millwood broken down by year of approval and sunset date for the preliminary plat approval.
- Total number of approved, but un-built, multi-family units in the City of Millwood.
- Total areas of vacant commercial and industrial land in the City of Millwood, sorted according to parcel size ranges (less than .25 acre; .25 acre to 1 acre; 1 acre to 5 acres; 5 acres to 10 acres; etc.)
- Total acres of unplatted land available for development in the City of Millwood, sorted according to the City's existing zoning categories.
- Future capacity projections, based upon current City of Millwood zoning regulations.
- Listing of all assumptions made, list of participants (both governmental and non- governmental), and recommendations for wider public comment.

The City of Millwood zoning map and records of the Spokane County Assessor's Office were utilized as the base information for this report with information supplemented by other sources such as Google Earth and 'field' methods as appropriate. Information contained in this report was compiled from January through September 2024; however, parcel data is frequently updated so information may be subject to change. Several properties that are coded as 91 Vacant Land, have actually been classified as Underutilized or not included in Vacant because they contain uses such as parking for adjoining businesses or outdoor sales lots (i.e. Paul's All Wood Custom Sheds).

For more information about the City of Millwood Periodic Update, please contact:
Amanda Tainio, Contract City Planner at planner@millwoodwa.us.

METHODOLOGY & ASSUMPTIONS

Spokane County adopted a revised Land Capacity Analysis (LCA) Methodology in March 2024 (included in Appendix A). The following are the primary methodology steps and assumptions utilized by the City of Millwood:

Step #1: Identify lands that are potential candidates to accommodate future growth, including vacant, partially used, and underutilized land.

1. Vacant Land - Initial identification of these lands includes any lot or parcel that does not contain improvement value exceeding \$5000 in value, as determined from the Assessor's records. Regardless of improvement value, land containing a distinctive land use or clearly supporting other nearby uses should not be considered vacant. Parking lots, storage yards, and golf courses are some examples of such land which would not be considered vacant. This is initially determined using Property Class codes ending in *91 (e.g., 891 "land with adjoining use"), though identification by other means may be required. Additionally, some parcels may contain a significant part of a structure but have no improvement value because the assessor typically only assigns improvement value to one of multiple related parcels. Again, Assessor Property Codes can be used to identify these parcels and remove them from the "vacant land" inventory. Where a planned unit development (PUD) or preliminary plat has been adopted for a given area, jurisdictions may use the approval of those instruments to inform the capacity of those vacant areas. For example, if a PUD has been approved for 1,000 units, and only 750 units have been platted and constructed, the jurisdiction can consider the area to contain 250 units of additional capacity. Steps two through five below should not be applied to areas within PUDs and preliminary plats. Likewise, if a jurisdiction has adopted a sub area plan, specific plan, or study for a given area which provides for an estimated buildout scenario, that study or plan can be relied upon to determine the capacity of an area rather than steps two through four below.

2. Partially Used Land - Land in this category is occupied by a use which is consistent with zoning but contains enough land to be further subdivided without need of rezoning. Partially used residential land in urban areas includes those properties that can be subdivided into eight (8) or more lots, parcels, or tracts consistent with existing zoning standards. As an additional consideration, jurisdictions can subtract lands from this category that contain a very valuable home, as very valuable homes on large lots are not expected to subdivide or redevelop within the 20-year timeline. Accordingly, any partially used land with at least eight times more improvement value than land value can be removed from the available capacity. Commercial and industrial lands will not be calculated in this category.

2024 & 2025 values utilized.

3. Underutilized Land - These parcels include those zoned for more intensive use than that which currently occupies the property. For example, a single family home in a multi-family zoning district would fit within this category. If a parcel is classified as underutilized, it is not included in the partially used category as the capacity does not assume the existing use would remain if redeveloped. An existing residential use(s) on a commercial or industrial zoned parcel will be considered under-utilized and counted as such. A parcel in a commercial or industrial zone with an improvement value of four times the land value or less should also be reviewed further for the likelihood that it would redevelop as either

residential or commercial/industrial use. Each jurisdiction should then determine the likelihood that redevelopment of these parcels would include residential units or commercial/industrial uses and include them in their underutilized land accordingly. An improvement to land value ratio of 4 to 1 is considered “average” for normal uses by the Assessor. Accordingly, these parcels may not redevelop in the 20-year timeframe if the improvement value is high enough, even if the use is generally non-conforming. Likewise, an Assessor Property Class of 391 can be used to select for these properties and to review whether they should be included in the Underutilized category.

2024 & 2025 values utilized. 4x land to building value not utilized in UR-1 or UR-2 determinations due to inconsistent assessment values for comparable homes and the majority of homes in Millwood being in underutilized category based on this criterion. As homes are re-assessed in 2026-2027, building values will likely increase. UR-3 underutilized includes single family homes in the multi-family zone with a building value of less than 4x the land value.

4x land to building value not utilized for properties with a Millwood Historic District Overlay either (C-2 and UR-2 Zone determinations).

2 properties on Millwood Historic Register have been removed from available land in Step #1.

Inland Empire Paper (IEP) owned land has been removed from the available land due to IEP policy of retaining land for noise buffers and air sheds (6 parcels zoned I-2 & 6 parcels zoned UR-2 were removed in Step #1).

Union Pacific Railroad parcel that bisects the City of Millwood has been included under right-of-way (ROW).

Step #2: Subtract all parcels that the community defines as not developable because of physical limitations.

Lands consisting of designated critical areas or other physical constraints may, in some cases, be subtracted from the inventory due to the presence of certain features which makes them difficult or impossible to develop. Critical areas, such as wetlands or streams, are commonly constrained by policies and regulations prohibiting development in these areas. Accordingly, any lands containing these features should be subtracted from the lands identified in Step 1. Affected areas should include not just the boundary of a known critical area but also the associated buffer that may be required by local code or policy. If policies or regulations are such that development is completely prohibited, then the area would be subtracted from the available land supply. If development would be allowed with mitigating measures, then the land area or a portion of it should be counted as available. However, any exclusion should not imply that such land cannot be developed, but instead recognizes that the difficulties associated with doing so are enough to limit development potential. Areas that may be excluded to one degree or another from the available land supply include, but are not limited to:

- Critical areas (as defined in RCW 36.70A)
- Natural resource lands (as defined in RCW 36.70A)
- Steep slopes and other geohazards (according to locally adopted critical areas ordinances or other local delineation)

- Shoreline Jurisdictional Areas
- Water bodies, including designated wetlands and their buffers.

In any case, it is up to the individual jurisdiction to analyze and to justify in their report how the various policies or regulations impact the land capacity analysis, according to local regulations and data sources.

Per the adopted Millwood Shoreline Management Program (SMP), residential development is prohibited waterward of the OHWM and within native conservation areas, as defined for the SRE designation. Parcels with a shoreline residential designation that have approx. 70% or more of the lot within the OHWM or native conservation areas / shoreline buffer, have been removed from the underutilized land category (per Step #2 of LCA methodology) - 1 parcel removed (45064.0023), parcel 45064.0026 approx. 60%.

Step #3: Subtract lands which will be needed for other public purposes.

This includes utility corridors, landfills, sewage treatment plants, recreation, schools, and other public uses (GMA, Section 15, RCW 36.70A. 150). Areas in this category include both public and private properties which are either currently owned and operated or those which will be needed to meet future needs in developing areas. Common owners of these lands, for example, may include utility companies, school districts, parks departments, or railroads to name a few. Likewise, the type of property tax exemption applied to these properties can be used to make an initial selection of these lands. In any case though, any lands removed from the capacity for Step 3 should consider that the predominate existing or planned use of the land is such that it would not reasonably be considered as available for any type of residential, commercial, or industrial development. Sample areas to be removed from available capacity include, but are not limited to:

1. Roads or rights-of-way (ROWs) - this category includes lands which will be needed for circulation facilities as relatively undeveloped areas begin to develop. Existing ROWs should be removed, but also a percentage of acres of land capacity should be subtracted from the overall capacity to account for internal circulation and other circulation needs. The actual percentage subtracted should be determined based upon development trends unique to the individual jurisdiction. Those assumptions then need to be documented in the individual jurisdictions' report.
2. School sites - this includes both existing sites and those additional needs which will be generated by growth in development areas.
3. Park sites - this includes both existing sites and those additional needs which will be generated by growth in developing areas. When available, the local jurisdiction's level of service for parks provision should be used to estimate the amount to be removed.
4. Utility substations, corridors, and other facilities - this category includes both existing and anticipated sites and corridors which would preclude residential, commercial, or industrial development.
5. Other public lands - any other public need which is known to the local jurisdiction.

Right-of-way (ROW) and railroad line parcels have been excluded from this LCA. Per LCA Step #3, additional ROW land is not needed based on current development trends for Millwood.

Step #4: Subtract ... "that percentage of land" ... which you assume will not be available for development within your plan's 20-year timeframe.

Assume that a certain percent of vacant, under-utilized, and partially-used lands will always be held out from development. This factor takes into consideration the fact that not all available lands will actually become available for development in the next 20 years. This could be due to a variety of personal and economic reasons. Applied universally to all capacity areas, it is safe to assume a percentage of all vacant, partially used, or underutilized land will simply not develop within the 20-year timeframe. This percentage that is taken out of capacity for various unknown economic and social reasons is known as the market factor. There is insufficient data available locally, regionally, or on a state level to determine an exact market factor to apply—there are simply too many variables at play to determine the market factor with any certainty. Therefore, jurisdictions in the County assume that approximately 30 percent of the total available land will not be available for development during the next 20 years.

Step# 5: Determine total capacity.

After determining desirable densities and land uses for various areas within your jurisdiction (i.e., vacant, partially used, and underutilized), multiply the number of acres in remaining parcels by the number of units per acre allowed in the area where the parcel is located. Add together to determine total capacity of vacant, underutilized, and partially-used lands. The sorting of the available land supply according to the generalized existing zoning categories of residential, commercial, and industrial is key to determining total land capacity. The land quantity analysis and report will estimate that future land capacity given existing zoning. To do this, historic development data along with other information sources available to each jurisdiction should be used to determine an assumed development capacity by zone for all capacity lands. Assumptions should be provided for the number of dwelling units per acre expected in various zones as well as the resulting number of people per unit expected in those areas. Secondary information sources, such as the US Census and Office of Financial Management data can be used to inform the population assumptions in this step. Separate calculations can be applied to vacant, underutilized, and partially used portions of each jurisdictions' capacity, provided the assumptions behind those are clearly documented.

Per the US Census Bureau 2022 American Community Survey (ACS), Millwood has an average of 2.44 persons per household (3.04 persons per family). This has increased from the data utilized in the previously adopted City Comprehensive Plan (2.28 persons per household based on 2017 ACS).

Based on bulk density standards under Table 15 in the adopted City Comprehensive Plan, the following were the factored units per sq. ft. based on the zone. Lot coverage and allowed uses were also factored consistent with RCW 36.70A.115 (comprehensive plans and development regulations must provide sufficient land capacity for development) and WAC 365-196-325 (providing sufficient land capacity suitable for development).

Table 15 Bulk Density Standards			
Bulk Standards	UR-1	UR-2	UR-3
Maximum density	2 units per 10,000 sq. ft.	1 Unit per 5,000 sq. ft. or 2 units per 7,200 sq. ft	2,500 sq. ft. per dwelling unit

Additional mixed use and residential development can also be accommodated in the C-2 and C-1 zones based on current development regulations, but likely at a smaller household/family size.

Additionally, the western portion of Millwood has an ACZ-5 Overlay for Felts Field. An analysis was performed based on Millwood Municipal Code (MMC) Section 17.38.005 - General provisions - K. Airport Compatibility and Millwood has plenty of remaining capacity to accommodate growth in the affected zones.

Step# 6: Compare the population and unit capacity estimated by this process against the adopted population forecast and housing allocation forecast for each jurisdiction.

Once the capacity in both units and population is generated, it should be compared to the population growth forecast for each jurisdiction as well as the housing allocation required by House Bill 1220. By comparing population and unit capacity against the forecast allocation set by the Steering Committee of Elected Officials and ultimate the Board of County Commissioners, jurisdictions can determine what steps are required by the State to comply (i.e., annexation, UGA modifications, regulation amendments).

Spokane County Population Allocation (Millwood is 0.05% or 49 persons by 2046) with a housing allocation of up to 106 units (Berk Method A Prime – November 2024). HAPT needs to use each jurisdiction's/area's share of housing growth as input vs. their share of population growth to accurately apportion housing unit income targets to each jurisdiction/area.

BUILDING INTENSITIES BY ZONE

The City of Millwood has 829 total parcels, excluding right-of-way (ROW). This is an increase of only two (2) parcels since the last Comprehensive Plan update. The following table further breaks down this information by each zoning category (based on the July 2022 Official City Zoning Map) for parcels, acres, and percent of the total.

Zoning Category	# of Parcels	Acres	Percent
Residential (UR-1)	85	46.98	10.5%
Residential (UR-2)	575	162.79	36.3%
Residential (UR-3)	42	12.44	2.8%
General Commercial (C-1)	49	38.24	8.5%
Low-Intensity Commercial / Mixed Use (C-2)	53	13.06	2.9%
Light Industrial (I-1)	5	5.65	1.3%

Industrial / Manufacturing (Paper Mill Alternative I-2)	6	53.29	11.9%
Public Reserve (P-1)	14	27.10	6.0%
Zoning Total	829	359.55	80.3%
Right-of-Way & Railroad Parcel (10.66 Acres)	N/A	88.45	19.7%
City Total (0.7 Square Miles in City Boundary)	829	448	100%

There are no currently approved preliminary plats that have not been finalized, nor any approved but un-built, multi-family units in the City of Millwood. In the UR-1 Zone, Magnolia Village was approved in April 2024 for 17 units (manufactured home park) on two (2) parcels, one that is vacant and one that currently contains a single-family home; however, no action has yet been taken to finalize or begin construction on the project.

BUILDABLE LANDS ANALYSIS

Based on the methodologies and assumptions above, the following sections analyze the unplatted land, residential land, commercial / industrial land, and public reserve land capacity in the City of Millwood.

Unplatted Land

The vast majority of land within the City of Millwood has been platted with subdivisions dating back to the early 1900's. Inland Empire Paper Company (IEP) owns a large area of unplatted land with one parcel that has large vacant pieces totaling approximately seven (7) acres in the northeast portion of the City; however, in the foreseeable future, IEP has no plans of leaving Millwood or selling off portions of the land. Should land become available, this would open up unplatted land within the city boundary and allow for new growth within the current industrial / manufacturing (Paper Mill Alternative) I-2 zone that would be re-zoned per City Code. The UR-2 Zone also has several unplatted parcels; however, they all contain residential uses with only one (1) parcel classified as underutilized residential. The UR-3 Zone has two (2) unplatted and underutilized residential parcels. The following table represents the unplatted land available in the City of Millwood.

Zoning Category	Unplatted Parcels	Unplatted Acres	Land Status	Available for Development
Residential (UR-1)	None	None	N/A	N/A
Residential (UR-2)	87	25.51	All parcels are Utilized Residential except: 1 Parcel - 2 acres in size is Underutilized Residential 1 Parcel - 0.04 acres in size (non-conforming lot) is Vacant Residential	No / Not Currently

Zoning Category	Unplatted Parcels	Unplatted Acres	Land Status	Available for Development
Residential (UR-3)	3	0.96	1 Parcel - 0.28 acres in size is Utilized Residential 2 Parcels - 0.34 acres each are Underutilized Residential	No / Not Currently
General Commercial (C-1)	2	8.45	1 Parcel - 3.92 acres in size is Utilized Commercial 1 Parcel - 4.53 acres in size is Utilized Commercial	No
Low-Intensity Commercial / Mixed Use (C-2)	1	0.55	Utilized Commercial	No
Light Industrial (I-1)	None	None	N/A	N/A
Industrial / Manufacturing (Paper Mill Alternative I-2)	2	37.39	1 Parcel - 35.83 acres in size is Utilized Industrial 1 Parcel - 1.56 acres in size is Utilized Industrial	No - IEP
Public Reserve (P-1)	11	16.40	Public Reserve	No
Zoning Total	106	89.26	Only 4 Unplatted Parcels totaling 2.72 acres are Vacant or Underutilized Residential There are no Unplatted Parcels that are Underutilized or Vacant Commercial / Industrial	None are currently available

Residential Land Analysis

Zoning Category	Vacant Residential Acreage	Partially Used Residential Acreage	Underutilized Residential Acreage	Utilized Residential Acreage	Total Acreage	Total Sq. Ft.
Residential (UR-1)	2.32	0	1.65	43.01	46.98	2,047,825.45

Residential (UR-2)	0.94	0	2.00	159.85	162.79	7,082,862.44
Residential (UR-3)	0.26	0	6.62	5.56	12.44	541,970.52
Zoning Total	3.52	0	10.27	208.42	222.21	9,672,658.41

Commercial and Industrial Land Analysis

Zoning Category	Vacant Commercial / Industrial Acreage	Underutilized Commercial / Industrial Acreage	Utilized Commercial / Industrial Acreage	Total Acreage	Total Sq. Ft.
General Commercial (C-1)*	0.44	4.63	33.17	38.24	1,665,528.76
Low-Intensity Commercial / Mixed Use (C-2)*	0.40	4.42	8.24	13.06	567,973.40
Light Industrial (I-1)	0.71	1.62	3.32	5.65	245,805.00
Industrial / Manufacturing (Paper Mill Alternative I-2)	0	0	53.29	53.29	2,321,447.95
Zoning Total	1.55	10.67	98.02	110.24	4,800,755.11
* Additional mixed use and residential can also be accommodated in the C-2 and C-1 zones based on current development regulations.					

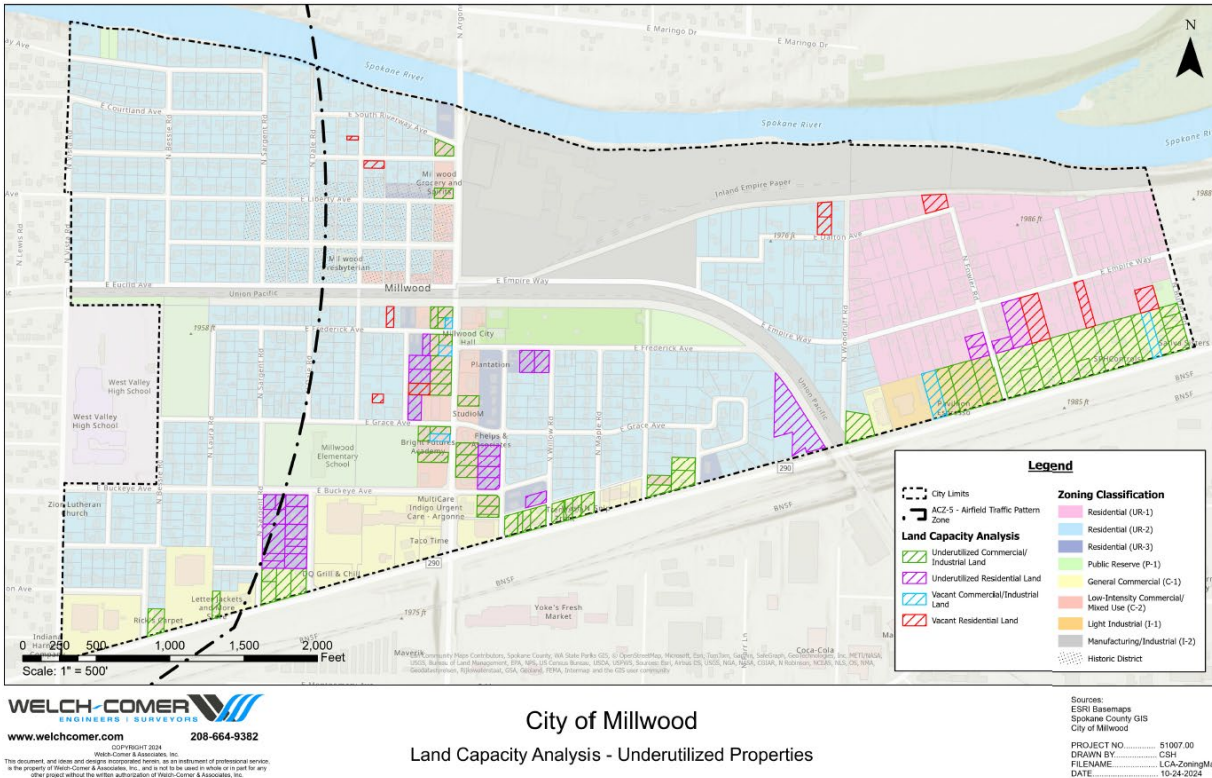
Zoning Category	Total Vacant Commercial / Industrial Acreage	Parcels less than 0.25 acres	Parcels 0.25 acre - 0.50 acres	Parcels 0.51 acres - 1 acre	Parcels greater than 1 acre
General Commercial (C-1)*	0.44	0	1	0	0
Low-Intensity Commercial / Mixed Use (C-2)*	0.40	3	0	0	0
Light Industrial (I-1)	0.71	0	0	1	0
Industrial / Manufacturing (Paper Mill Alternative I-2)	0	0	0	0	0
Zoning Total	1.55	3	1	1	0
* Additional mixed use and residential can also be accommodated in the C-2 and C-1 zones based on current development regulations.					

Public Reserve Land Analysis

Zoning Category	Parcel Class Code	Acreage	Sq. Ft.	Ownership - Use
Public Reserve (P-1)	91 Vacant Land	0.26	11,325.60	City of Millwood - Future Riverfront Park
	91 Vacant Land	0.25	10,890.00	City of Millwood - Future Riverfront Park
	91 Vacant Land	0.87	37,768.00	Spokane County - Abandoned Burlington Northern Railroad R/W Branch Line 60ft Wide (Interurban Trail)
	91 Vacant Land	0.42	18,092.00	Spokane County - Abandoned Burlington Northern Railroad R/W Branch Line 60ft Wide (interurban Trail)
	67 Service - Governmental	5.19	226,072.00	City of Millwood - Millwood Park & New Park Water Well
	67 Service - Governmental	0.40	17,327.00	City of Millwood - Water Tower, Old Park Water Well, and Eastern Portion Of Millwood Park w/ Locust Rd. ROW
	67 Service - Governmental	0.49	21,232.00	City of Millwood - Public Works
	67 Service - Governmental	0.51	22,400.00	City of Millwood - Butler Water Well & Storage Shop
	67 Service - Governmental	0.41	17,710.00	City of Millwood - City Hall
	67 Service - Governmental	0.32	14,068.00	City of Millwood - Millwood Fire Station
	68 Service - Education	5.38	234,494.00	West Valley School District - West Valley High School Ballfields
	68 Service - Education	6.10	265,686.00	West Valley School District - Millwood Elementary School / Kindergarten Center
	69 Service - Education	4.09	178,067.00	West Valley School District - Millwood Elementary School / Kindergarten Center Ballfields
	48 Utilities	2.41	105,000.00	Avista Corporation - Power Plant
Zoning Total		27.10	1,180,131.60	

Land Capacity Analysis Map by Zone

The following map identifies the vacant and underutilized properties by zone, prior to completion of the capacity analysis Steps #4 - #6.



FUTURE CAPACITY PROJECTIONS

Based on the analysis above and current zoning regulations, the following are future capacity projections for the City of Millwood.

Commercial / Industrial Capacity

An employee per acre (EPA) calculation has not been established for the City of Millwood. The City of Cheney utilized the *Oregon Department of Land Conservation and Development (DLCD)'s Industrial and Other Employment Lands Analysis: Basic Guidebook (2005)* for their LCA. This guidebook advocates for EPAs of 7-12 for heavy industrial uses, 10-15 for light industrial uses, and 12-20 for commercial uses. For consistency within Spokane County, this is the resource that has been utilized for Millwood's Commercial / Industrial Lands.

C-1 Zone	Vacant Commercial / Industrial	Underutilized Commercial / Industrial
General Commercial (C-1) Parcels	1 Parcel	32 Parcels
General Commercial (C-1) Acreage	0.44 Acres	4.63 Acres
30% Market Factor Reduction (LCA Step #4)	0.13 Acres	1.39 Acres
C-1 Zone - Available Land After 30% Market Factor Reduction*	0.31 Acres	3.24 Acres
Maximum Building / Site Coverage	75%	75%
Remaining Available Land	0.23 Acres	2.43 Acres
C-1 Zone Land Capacity - EPA Calculation (LCA Step #5)	Vacant Commercial / Industrial	Underutilized Commercial / Industrial
12-20 EPA for commercial uses	2.76 - 4.60 Additional Employees	29.16 - 48.60 Additional Employees
* Additional residential units on parcels without a commercial use or with mixed use can also be accommodated in the C-1 zone based on current development regulations.		

C-2 Zone	Vacant Commercial / Industrial	Underutilized Commercial / Industrial
Low-Intensity Commercial / Mixed Use (C-2) Parcels	3 Parcels	21 Parcels
Low-Intensity Commercial / Mixed Use (C-2) Acreage	0.40 Acres	4.42 Acres
30% Market Factor Reduction (LCA Step #4)	0.12 Acres	1.33 Acres
C-2 Zone - Available Land After 30% Market Factor Reduction*	0.28 Acres	3.09 Acres
Maximum Building / Site Coverage	50% (85% w/ mixed use)	50% (85% w/ mixed use)
Remaining Available Land	0.14 Acres (0.24 w/ mixed use)	1.55 Acres (2.63 w/ mixed use)
C-2 Zone Land Capacity - EPA Calculation (LCA Step #5)	Vacant Commercial / Industrial	Underutilized Commercial / Industrial
12-20 for commercial uses	1.68 - 4.80 Additional Employees	18.60 - 52.60 Additional Employees
* Additional residential units can also be accommodated in the C-2 zone through mixed use based on current development regulations.		

I-1 Zone	Vacant Commercial / Industrial	Underutilized Commercial / Industrial
Light Industrial (I-1) Parcels	1 Parcel	3 Parcels
Light Industrial (I-1) Acreage	0.71 Acres	1.62 Acres
30% Market Factor Reduction (LCA Step #4)	0.21 Acres	0.49 Acres
I-1 Zone - Available Land After 30% Market Factor Reduction	0.50 Acres	1.13 Acres
Maximum Building / Site Coverage	75%	75%
Remaining Available Land	0.38 Acres	0.85 Acres
I-1 Zone Land Capacity - EPA Calculation (LCA Step #5)	Vacant Commercial / Industrial	Underutilized Commercial / Industrial
10-15 for light industrial uses	3.80 - 5.70 Additional Employees	8.50 - 12.75 Additional Employees

I-2 Zone	Vacant Commercial / Industrial	Underutilized Commercial / Industrial
Industrial / Manufacturing (Paper Mill Alternative I-2) Parcels	0	0
Industrial / Manufacturing (Paper Mill Alternative I-2) Acreage	0	0
30% Market Factor Reduction (LCA Step #4)	0	0
I-2 Zone - Available Land After 30% Market Factor Reduction	0	0
I-2 Zone Land Capacity - EPA Calculation (LCA Step #5)	Vacant Commercial / Industrial	Underutilized Commercial / Industrial
7-12 for heavy industrial uses	0 Additional Employees	0 Additional Employees

Residential Capacity

Per the Millwood Municipal Code (MMC), legal nonconforming lots shall be considered a buildable lot even though such lots fail to meet the requirements for frontage width or lot area that are generally applicable in the zone, provided that yard setbacks and requirements other than frontage width or lot area shall conform to the regulations for the zone in which such lot is located. Legal non-conforming lots, including secondary lots with access likely via a driveway easement, have been included for future projections. Per the US Census Bureau 2022 American Community Survey (ACS), Millwood has an average of 2.44 persons per household.

UR-1 Zone	Vacant Residential	Underutilized Residential
Residential (UR-1) Parcels	4 Parcels	4 Parcels
Residential (UR-1) Acreage	2.32 Acres	1.65 Acres
30% Market Factor Reduction (LCA Step #4)	0.70 Acres	0.50 Acres
UR-1 Zone - Available Land After 30% Market Factor Reduction	1.62 Acres	1.16 Acres
Maximum Building / Site Coverage	40%	40%
Remaining Available Land	0.65 Acres	0.46 Acres
UR- 1 Zone Land Capacity - Current # of units w/ current zoning (LCA Step #5)	Vacant Residential (Current Zoning)	Underutilized Residential (Current Zoning)
2 Dwelling Unit per 10,000 Sq. Ft.*	5.66 Units	4.00 Units
UR- 1 Zone Land Capacity - Proposed # of units w/ proposed zoning (LCA Step #5)	Vacant Residential (Proposed Zoning)	Underutilized Residential (Proposed Zoning)
1 Dwelling Unit per 5,000 Sq. Ft. (At Least 2 or 3 units permitted per lot)	5.66 Units	4.00 Units
Estimated Additional Population	Vacant Residential	Underutilized Residential
2.44 persons per household	13.81 People	9.76 People
* Multi-Family (3 or more units) currently requires a Conditional Use Permit (CUP) in UR-1 Zone. Single Family and Duplex (2 Units) are currently Permitted (P) uses in UR-1 Zone.		

UR-2 Zone	Vacant Residential	Underutilized Residential
Residential (UR-2) Parcels	6 Parcels	1 Parcel
Residential (UR-2) Acreage	0.94 Acres	2.00 Acres
30% Market Factor Reduction (LCA Step #4)	0.28 Acres	0.60 Acres
UR-2 Zone - Available Land After 30% Market Factor Reduction	0.66 Acres	1.40 Acres
Maximum Building / Site Coverage	40%	40%
Remaining Available Land	0.26 Acres	0.56 Acres
UR- 2 Zone Land Capacity - Current # of units w/ current zoning (LCA Step #5)	Vacant Residential (Current Zoning)	Underutilized Residential (Current Zoning)
1 Dwelling Unit per 5,000 Sq. Ft.	2.27 Units	4.88 Units
2 Dwelling Unit per 7,200 Sq. Ft.	3.15 Units	6.78 Units
UR- 2 Zone Land Capacity - Proposed # of units w/ proposed zoning (LCA Step #5)	Vacant Residential (Proposed Zoning)	Underutilized Residential (Proposed Zoning)

1 Dwelling Unit per 3,600 Sq. Ft. <i>(At Least 2 or 3 units permitted per lot)</i>	3.15 Units	6.78 Units
Estimated Additional Population	Vacant Residential	Underutilized Residential
2.44 persons per household	7.69 People	16.54 People
Multi-Family (3 or more units) is currently Not Allowed in UR-2 Zone. Single Family and Duplex (2 Units) are currently Permitted (P) uses in UR-2 Zone.		

UR-3 Zone	Vacant Residential	Underutilized Residential
Residential (UR-3) Parcels	1 Parcel	23 Parcels
Residential (UR-3) Acreage	0.26 Acres	6.62 Acres
30% Market Factor Reduction (LCA Step #4)	0.08	1.99
UR-3 Zone - Available Land After 30% Market Factor Reduction	0.18 Acres	4.63 Acres
Maximum Building / Site Coverage	40%	40%
Remaining Available Land	0.07 Acres	1.85 Acres
UR- 3 Zone Land Capacity - Current # of units w/ current zoning (LCA Step #5)	Vacant Residential (Current Zoning)	Underutilized Residential (Current Zoning)
1 Dwelling Unit per 2,500 Sq. Ft.	1.22 Units	32.23 Units
UR- 3 Zone Land Capacity - Proposed # of units w/ proposed zoning (LCA Step #5)	Vacant Residential (Proposed Zoning)	Underutilized Residential (Proposed Zoning)
1 Dwelling Unit per 2,500 Sq. Ft. <i>(2 or more units permitted per lot)</i>	1.22 Units	32.23 Units
Estimated Additional Population	Vacant Residential	Underutilized Residential
2.44 persons per household	2.98 People	78.64 People
Single Family, Duplex (2 Units), and Multi-Family (3 or more units) are currently Permitted (P) uses in UR-3 Zone.		

Comparison (Step #6) and Conclusions

Zoning Category	Vacant & Underutilized Remaining Available Land	Total Dwelling Unit Capacity (Vacant & Underutilized Land)	Estimated Additional Population
Industrial (I-1 & I-2)	1.23 Acres	N/A	12.30 - 18.45 Employees
Commercial (C-1* & C-2**)	4.35 - 5.53 Acres	Varies	52.20 - 110.60 Employees
Residential (UR-1, UR-2, & UR-3)	3.85 Acres	53.04	129.42 People
* Additional residential units on parcels without a commercial use or with mixed use can also be accommodated in the <u>C-1 zone</u> based on current development regulations, but likely at a smaller household/family size.			
** Additional residential units can also be accommodated in the <u>C-2 zone</u> through mixed use based on current development regulations, but likely at a smaller household/family size. Example: C-2 has an 85% mixed use lot coverage with the opportunity for shared parking and 2.87 acres (125,017 sq. feet) of remaining available land. Using a typical three-story (3 story), 10,950 sq. ft mixed use building that encompasses a footprint of 3,650 sq. ft (0.08 acres) with at least 25% of the building or one floor being devoted to residential and units sized at approximately 750 sq. ft. each, the building could accommodate 4 units. Based on this example building, if 15% of the available land (18,752 sq. ft.) was utilized for mixed use, the land could accommodate an additional 20 units.			
Housing Allocation (per HAPT for Spokane County)	As of November 2024, Millwood needs to plan for up to 106 additional housing units (dependent on share of housing % allocated to the City of Millwood) with housing units allocated across income bands as well as 2 - 5 temporary emergency housing units.		

Total population and housing allocation can be accommodated within Millwood's Urban Growth Area (UGA) which is the City boundary, under current zoning designations utilizing infill development; however, code amendments will be required to comply with state legislation for Accessory Dwelling Units (ADU) and the Housing for All Planning Tool (HAPT) for allocated housing units across income bands and number of units.

Potential methods to accommodate additional units (*in addition to or in cooperation with code amendments that will be required to comply with state legislation for Accessory Dwelling Units (ADU) and the Housing for All Planning Tool (HAPT) for housing units allocated across income bands*):

- Additional missing middle housing types as permitted uses
- Lot coverage reductions
- Setback reductions / zero lot line option
- Lot width reductions
- Lot area reductions or removal of minimum / maximum lot sizes (form based)
- Private driveways to serve up to 3 lots (up to 6 units – i.e. duplexes or additional for triplex, fourplex, multi-family, etc. – research other jurisdictions' standards)

PUBLIC PARTICIPATION

This Land Capacity Analysis (LCA) Report will be posted on the City of Millwood's Periodic Update webpage for public and agency review (<https://www.millwoodwa.us/periodic-updates>) with advertisement via social media, email, etc., as outlined in the City of Millwood's Periodic Update 2026 Public Participation Plan. This LCA Report will also be presented to the Millwood Planning Commission and City Council.

APPENDIX

- 2024 Spokane County Land Capacity Analysis Methodology