Washington County

Community Development Code

Draft Approach to CDC Priorities Report

Technical Advisory Committee Review Draft

April 2026

Prepared by Cascadia Partners

Executive Summary

Introduction

Washington County, with Cascadia Partners, is undertaking a project to review the Community Development Code (CDC) and identify ways to improve its usability and support the development of needed housing.

The first step of this project resulted in a CDC Assessment Summary Report, which identified a broad range of potential amendments to improve the CDC's compliance with state law, support housing production, and make the CDC easier to use and understand.

This document represents the beginning of the second phase of the project and outlines a draft approach to organizing and prioritizing the recommended CDC changes. The document lays out a proposed framework for how to organize the amendments into packages and presents a draft set of criteria by which to evaluate the relative priority order for completion of each amendment package. Because this project is comprehensive in its review of the CDC, it includes some overlap with concurrent efforts to amend the CDC that are prioritized in the County's 2025-2027 Planning Work Program. The overlap of these concurrent efforts are addressed throughout this document.

This document is provided to gather feedback from the project's Technical Advisory Committee (TAC) on the draft prioritization criteria and the potential impact of the amendment packages. Specifically, the TAC's input is sought on the proposed Prioritization Criteria ratings for the **Urgency** and **Impact** of each amendment package. These two criteria reflect how time-sensitive each package is and what outcomes it is expected to achieve. These are areas where community and stakeholder perspective is essential. The third criterion, **Feasibility**, addresses the staffing, resources, and sequencing dependencies needed to carry out the work. Because feasibility involves internal capacity and operational considerations, it will be determined by County staff and decisionmakers and is not a focus of TAC review. The TAC's feedback, along with feedback from County staff, a community open house, Planning Commission, and the Board of Commissioners will be used to develop a final CDC Amendment Priorities Report.

Outline

This document organizes the recommended amendments into logical amendment packages and sets up a framework to guide implementation. This executive summary provides an overview and considerations for the TAC. More detail to support the TAC's discussion and feedback is provided in the main body of the document starting on page 6. The document is organized into three sections:

- **Amendment Packages** presents each package with a brief description of its scope and contents.
- **Prioritization Criteria** describes the criteria used to evaluate and sequence amendment packages.

- **Approach to Phasing** translates the prioritization criteria into a recommended order for tackling the amendment packages.

In addition to the proposed amendment packages, two ongoing or anticipated County processes will result in CDC amendments that are outside the scope of this prioritization framework:

- **Housing Facilitation Ordinance (HFO).** The County is currently developing a series of changes to the CDC to facilitate residential development, for adoption later this year as a land use ordinance. This work was prioritized in the County's 2025-2027 Planning Work Program (Task 1.3). The ordinance will propose amendments to comply with several housing-related statutes, and other amendments to remove unnecessary barriers to housing review and approval. These include, but are not limited to, changes addressing accessory dwelling units, middle housing, manufactured and prefabricated homes, single room occupancies, and affordable housing. Because the CDC Assessment covers the code broadly, it includes some attention to topics also being addressed through the HFO.
- **Housing Capacity Analysis (HCA) and Housing Production Strategy (HPS).** The County must complete an HCA by the end of 2029 and an HPS by the end of 2030. The findings from the HCA and HPS may identify additional code changes needed to ensure enough housing capacity. Those changes cannot be defined until the analysis is done and are not included as a numbered package in this report.

Amendment Packages

The report organizes the recommended CDC changes into 13 amendment packages. Each package groups related changes that should be adopted together because they affect the same code sections, address the same policy goal, or depend on each other. The packages span a range of topics, from implementing recent state legislation and removing barriers to housing, to reorganizing the code for clarity and consolidating scattered definitions and procedures. Descriptions of each amendment package are in the Amendment Packages section of the document beginning on page 8.

Prioritization Criteria

The CDC Assessment identified many recommended changes that vary in urgency, expected impact, and the resources needed to carry them out. Since they cannot all be done at once, a prioritization framework was developed to help decide the order.

Each amendment package is evaluated using three criteria:

- **Urgency.** How time-sensitive is the package? Some packages have state-mandated deadlines, some address areas where the County is already out of compliance, and others have no external deadline.
- **Impact.** What outcomes will the package achieve? Impact is measured across five areas:

    - *Housing Production*. Whether the package directly enables or removes barriers to the construction of new housing units
    - *Housing Affordability*. Whether the package supports production of income-restricted affordable housing or housing types that are more affordable by design.
    - *Access to Opportunity*. Whether the package affects housing production in locations with access to transit, services, and employment.
    - *Code Usability*. Whether the package improves the clarity, consistency, or navigability of the CDC.
    - *Legal Compliance*. Whether the package maximizes the County's compliance with state law to reduce exposure to legal challenges based on provisions that may not comply with current statutory requirements. This impact area captures risk beyond what the Urgency criterion addresses, including gray areas where compliance is uncertain and provisions that could be challenged.
- **Feasibility.** What resources and efforts are needed? This includes the level of staff and/or consultant effort, whether external processes (like state rulemaking) must be completed first, and whether the package depends on other packages being done first. Note this section is not included for feedback from the TAC, but it will be included in the final draft of the Priorities Report. The TAC's feedback is focused on the impact and urgency prioritization criteria.

These three criteria are evaluated independently, and the ratings across all three criteria collectively inform recommendations for the order of the work

TAC Discussion Questions:

- Do the three prioritization criteria (Urgency, Impact, and Feasibility) capture the right considerations for prioritizing CDC amendments? Is anything missing?
- Are the five Impact areas (Housing Production, Housing Affordability, Access to Opportunity, Code Usability, and Legal Compliance) the right measures of outcomes? Should any be added, removed, or redefined?

Approach to Phasing

The phasing approach translates the prioritization criteria into a recommended order for tackling the amendment packages. Phasing is shaped by several fixed constraints that apply regardless of policy preferences: packages with state-mandated deadlines come first; packages that depend on outside processes (like the Transportation System Plan update) are scheduled around those timelines; and the total workload in any phase must be realistic given available staff capacity. The County's 2025-2027 Planning Work Program will also be a factor considered in the phasing of the amendment packages.

Beyond these fixed constraints, the framework presents three scenarios that reflect different policy emphases.

- **Scenario A: Housing Impact** prioritizes packages that directly support housing production and affordability.
- **Scenario B: Balanced** weighs all five impact areas equally.
- **Scenario C: Code Modernization** prioritizes reorganizing and simplifying the code, so that future changes are easier to draft and adopt.

The recommended sequence will be presented as a draft and informed by input from the Technical Advisory Committee, the March 17 in-person community open house, the March/April online open house, Planning Commission, Board of Commissioners, and County staff. This input may shift the priority of packages within the framework's constraints.

TAC Discussion Questions:

- Are there packages that should be prioritized earlier or later than the framework suggests, based on community needs or conditions on the ground?
- Are there any dependencies between packages, such as connections to other County, regional, or state initiatives, that should be factored into the sequencing?
- Do you have a preferred scenario for phasing the amendment packages?

Summary of Urgency and Impact Ratings

The following table summarizes the urgency and impact ratings for each amendment package. Impact ratings reflect the expected outcomes of adopting the package across five impact areas. These ratings are preliminary assessments intended to support discussion and input from the Technical Advisory Committee.

TAC Discussion Questions:

- Do the preliminary Urgency classifications in the table below seem right? Are there any packages whose time-sensitivity should be reclassified?
- Looking at the Impact ratings, are there packages where you would rate Housing Production, Housing Affordability, Access to Opportunity, Code Usability, or Legal Compliance differently? Which ones, and why?

Summary of Urgency and Impact Ratings Table

This table summarizes the ratings of the urgency and impact prioritization criteria for the TAC's feedback. It excludes feasibility prioritization criteria as this will be informed by staff's capacity, but it helps to provide an overview to guide TAC's feedback. *Descriptions of each amendment package are in the Amendment Packages section of the document beginning on page 8.*

#	Amendment Package	Urgency	Housing Production Impact	Housing Affordability Impact	Access to Opportunity Impact	Code Usability Impact	Legal Compliance Impact
1	Recent State Law Implementation	Statutory Deadline	Moderate	Moderate	Moderate	Low	High
2	Barriers to Legacy Housing Types	No External Deadline	Moderate	Moderate	Moderate	Moderate	N/A
3	Barriers to Higher-Density Multi-Unit Housing	No External Deadline	High	Moderate	High	Low	N/A
4	Barriers to Housing in Commercial, Mixed-Use, and Transit-Oriented Districts	No External Deadline	High	Moderate	High	Low	N/A
5	Design and Development Standards Consolidation and Compliance	Currently Out of Compliance	Moderate	Low	Moderate	High	High
6	Allowances for Specific Housing Types	Currently Out of Compliance	Low	Moderate	Low	Low	Low
7	Affordable Housing Incentives Enhancement	Currently Out of Compliance	Moderate	High	High	Low	Moderate
8	Rural Housing Updates	Currently Out of Compliance	Low	Low	Low	Moderate	Moderate
9	Use Regulations and Land Use Districts Reorganization	No External Deadline	Moderate	Low	Low	High	N/A
10	Definitions Consolidation	No External Deadline	Low	Low	Low	Moderate	N/A
11	Application and Procedures Consolidation	Currently Out of Compliance	Moderate	Low	Low	High	High
12	Clear and Objective Standards and Technical Corrections	Currently Out of Compliance	Low	Low	Low	Moderate	High
13	Solar Access Standards Removal	No External Deadline	Low	Low	Low	Moderate	N/A

Draft Approach to CDC Amendment Priorities

The following sections provide the full detail behind the draft approach. The Amendment Packages section presents all 13 packages with descriptions of their scope and the related findings from the CDC Assessment. The Prioritization Criteria section explains each prioritization criterion in depth, including the definitions and rating scales for Urgency, Impact, and Feasibility, and describes how these criteria will interact to guide sequencing decisions. The Approach to Phasing section describes the fixed constraints and policy scenarios that will shape the recommended order of work. Together, these sections provide the complete picture that TAC members are encouraged to review and provide feedback on.

Amendment Packages

This section presents 13 amendment packages organizing recommended CDC amendments identified through the CDC Assessment. Each package groups related amendments for coordinated adoption. Related findings from the CDC Assessment Summary Report are listed under each package for cross-reference.

#	Amendment Package
1	Recent State Law Implementation
2	Barriers to Legacy Housing Types
3	Barriers to Higher-Density Multi-Unit Housing
4	Barriers to Housing in Commercial, Mixed-Use, and Transit-Oriented Districts
5	Design and Development Standards Consolidation and Compliance
6	Allowances for Specific Housing Types
7	Affordable Housing Incentives Enhancement
8	Rural Housing Updates
9	Use Regulations and Land Use Districts Reorganization
10	Definitions Consolidation
11	Application and Procedures Consolidation
12	Clear and Objective Standards and Technical Corrections
13	Solar Access Standards Review

Package 1: Recent State Law Implementation

Implements state-mandated changes not addressed in the HFO per HB 2138. This package would also include any relevant state legislation that is passed in the 2026 legislative session.

Related CDC Assessment Summary Report findings:

- *HB 2138* (Statutory Compliance Review)

Package 2: Barriers to Legacy Housing Types

Addresses certain disparities between legacy housing types (pre-HB 2001 definitions) and Middle Housing that will not be addressed in the HFO. Legacy housing types are allowed in more districts than Middle Housing. When allowed in addition to similar Middle Housing forms, they may offer more housing options, including more potential to serve larger households. CDC changes relate to density, lot size, facade requirements, setbacks, and approval processes. Legacy housing types remain subject to stricter standards even though the homes they produce can look and function much the same as Middle Housing. These disparities may discourage production of non-Middle Housing types and limit flexibility. Affects all urban residential districts (R-5 through R-25+).

Related CDC Assessment Summary Report findings:

- *Middle Housing and non-Middle Housing forms are comparable but subject to different standards* (Barriers to Housing Production, Access and Opportunity)
- *Requirements for lot coverage, screening and buffering, and height step-downs constrain buildable area* (Barriers to Housing Production, Access and Opportunity)

Package 3: Barriers to Higher-Density Multi-Unit Housing

Removes barriers to achieving intended densities in the County's highest-density residential districts, including density threshold triggers, lot coverage limits, height step-down requirements, setback scaling, screening and buffering requirements, and other standards that cumulatively constrain buildable area. Primarily affects R-24, R-25+, and R-25+ North Bethany districts. The elimination of off-street parking minimums under CFEC rules has made higher densities more achievable, meaning more projects will encounter these constraints.

Related CDC Assessment Summary Report findings:

- *Few districts allow higher density multi-unit dwellings, and higher densities trigger added requirements* (Barriers to Housing Production, Access and Opportunity)
- *Requirements for setbacks, lot coverage, screening and buffering, and height step-downs constrain buildable area* (Barriers to Housing Production, Access and Opportunity)
- *Long-term bicycle parking requirements for multi-unit dwellings are unclear* (Barriers to Housing Production, Access and Opportunity)

Package 4: Barriers to Housing in Commercial, Mixed-Use, and Transit-Oriented Districts

As many of the issues identified as potential barriers to housing will be addressed in the HFO, this package addresses reducing density barriers to residential and mixed-use development in commercial, neighborhood commercial, and transit-oriented districts. It addresses restrictions that limit housing production in some parts of the County best-served by transit and services.

Related CDC Assessment Summary Report findings:

- *Commercial requirements and density limits restrict opportunities for housing development in mixed-use districts* (Barriers to Housing Production, Access and Opportunity)

Package 5: Design and Development Standards Consolidation and Compliance

Consolidates and simplifies design and development standards currently spread across multiple code sections, addresses clear-and-objective compliance issues in transit-oriented and pedestrian-oriented district design standards, and incorporates CFEC/Transportation Planning Rule requirements in coordination with the County's TSP update.

Related CDC Assessment Summary Report findings:

- *Design and development standards may be redundant across CDC sections* (Streamlining and Usability)
- *Clear and Objective Standards for Needed Housing* (Statutory Compliance Review)

Package 6: Allowances for Specific Housing Types

Codifies or updates allowances for specific housing types to comply with state law, including manufactured dwelling park density and lot size standards, manufactured home design standards, RV occupancy provisions, residential home and residential facility definitions, and prefabricated structure allowances that are not addressed in the HFO. Several of these statutory requirements are already in effect and the County is currently not in full compliance.

Related CDC Assessment Summary Report findings:

- *Occupancy of Recreational Vehicles (RVs)* (Statutory Compliance Review)
- *Residential Homes* (Statutory Compliance Review)
- *Residential Facility* (Statutory Compliance Review)

Package 7: Affordable Housing Incentives Enhancement

Reforms the County's incentives for regulated affordable housing (Section 404-5) to allow mixed-income developments, broaden maximum Average Median Income (AMI) thresholds, and reduce procedural barriers to using density and design bonuses. Also codifies state-mandated siting allowances for affordable housing, including allowances for affordable housing on commercial land and density and height bonuses. This package may include density bonuses for middle housing per HB 2138 depending on what is included in the HFO.

Related CDC Assessment Summary Report findings:

- *Incentives for Regulated Affordable Housing have limited utility* (Barriers to Housing Production, Access and Opportunity)
- *Affordable Housing: General Siting Allowances* (Statutory Compliance Review)
- *Affordable Housing: Redevelopment of Commercial Land* (Statutory Compliance Review)

- *Affordable Housing: Density and Height Bonus* (Statutory Compliance Review)
- *Affordable Housing: Expedited Review* (Statutory Compliance Review)

Package 8: Rural Housing Updates

Addresses housing-related issues in rural districts, including codification of farm dwelling allowances under state law that have not been incorporated into the CDC, simplification of approval processes for seasonal farm and forestry worker housing, dwelling alteration and replacement standards on resource lands, and clarification of fire safety access standards. Findings come primarily from detailed review of EFU, AF-20, AF-10, AF-5, and RR-5 district sections and Section 428 (Forest Structure Siting and Fire Safety Standards).

Package 9: Use Regulations and Land Use Districts Reorganization

Restructures permitted use lists into consolidated table formats, consolidates defined uses into a system of use categories, organizes similar land use districts into fewer sections to reduce repetition, and reformats density and dimensional standards for easier comparison across districts. May also include merging land use districts with very similar standards, such as R-5 and R-6, depending on policy direction. This is a large reorganization effort that would improve day-to-day usability of the code for staff, applicants, and the public.

Related CDC Assessment Summary Report findings:

- *Organization of permitted uses is complex and repetitious* (Streamlining and Usability)
- *Lists of density and dimensional standards are complex and repetitious* (Streamlining and Usability)
- *Organization of land use districts into individual CDC sections is repetitious* (Streamlining and Usability)

Package 10: Definitions Consolidation

Where appropriate, centralize defined terms in Section 106, migrating definitions currently scattered across individual code sections, and standardize capitalization and formatting of defined terms throughout the CDC. Currently, definitions appear in multiple locations, making it difficult for CDC users to determine whether or where a term is defined in the document.

Related CDC Assessment Summary Report findings:

- *Definitions are distributed throughout the CDC, rather than being centralized* (Streamlining and Usability)

Package 11: Application and Procedures Consolidation

Consolidates development application submittal requirements currently distributed across multiple code sections, clarifies approval criteria and review procedures, implements SB 974 procedural requirements for urban housing applications, codifies the opt-in provision for amended regulations, and evaluates neighborhood meeting requirements. The County's current neighborhood meeting requirement for most Type II applications is applicable to a broader array of development applications than peer jurisdictions in the Portland metro area.

Related CDC Assessment Summary Report findings:

- *Development application requirements and approval criteria are distributed throughout the CDC, rather than being centralized* (Streamlining and Usability)
- *Some procedures are unclear* (Streamlining and Usability)
- *Neighborhood meeting requirements for most Type II applications may increase risk and uncertainty* (Barriers to Housing Production, Access and Opportunity)
- *Opting-In to Amended Housing Regulations* (Statutory Compliance Review)
- *SB 974* (Statutory Compliance Review)

Package 12: Clear and Objective Standards and Technical Corrections

Addresses remaining clear-and-objective compliance issues in CDC sections not covered by other packages, and corrects outdated statutory references, cross-reference errors, gendered language, and other technical issues identified throughout the CDC Assessment.

Related CDC Assessment Summary Report findings:

- *Clear and Objective Standards for Needed Housing* (Statutory Compliance Review)
- *Individual sections are inconsistently organized across CDC articles* (Streamlining and Usability)

Package 13: Solar Access Standards Review

Reviews the solar access standards in Section 427, adopted in 1989, which staff report are antiquated, rarely applied, and difficult to implement. The CDC Assessment Summary Report, Appendix A, includes a summary of staff and consultant findings for Section 427.

Prioritization Criteria

Purpose

The CDC Assessment Summary Report identified a broad range of recommended amendments spanning statutory compliance, barriers to housing, and code usability and streamlining. These amendments vary in urgency, expected impact, and the resources required for implementation. Not all can or should be pursued simultaneously.

This section describes the methodology used to evaluate and sequence recommended CDC amendment packages. The framework provides a consistent basis for comparing packages across multiple criteria and is intended to support phasing and resource allocation decisions. The framework identifies tradeoffs and highlights where amendment packages differ. The final sequencing will reflect input from County staff, decision-makers, and community alongside these criteria.

The prioritization framework will be applied to each amendment package. Each package groups related CDC amendments that are recommended for coordinated adoption because

they affect the same CDC sections, address the same policy objective, or depend on one another for coherent implementation.

Individual amendment items within a package may vary in their impact or complexity. Where this variation is significant, this report will identify which items drive the overall rating and which are secondary, so that decision-makers can understand what is inside each package without requiring item-by-item scoring.

Each amendment package is evaluated across three criteria: **Urgency**, **Impact**, and **Feasibility**. These criteria are assessed independently and are not combined into a single composite rating or score. Instead, the ratings across all three criteria will inform a recommended prioritization and sequencing.

Criterion 1: Urgency

Urgency classifies the time-sensitivity of each package. Rather than a rated scale, it is a categorical designation based on external requirements and implementation dependencies.

Classification	Definition
Statutory Deadline	The package addresses requirements with a specific compliance date established by state law. Missing the deadline may expose the County to legal risk or state enforcement action.
Currently Out of Compliance	The package addresses statutory requirements already in effect. There is no future deadline, but the County is currently not in compliance, which may expose the County to legal risk.
Prerequisite	The package must be completed before one or more other packages can proceed, or completing it substantially improves the efficiency of subsequent packages.
No External Deadline	The package addresses important policy or usability objectives but is not driven by a statutory requirement or implementation dependency.

A single package may carry more than one urgency classification. For example, a package with a statutory deadline may also be a prerequisite for subsequent work.

Criterion 2: Impact

Impact describes the expected outcomes of adopting the amendment package. The five impact areas listed below capture the range of outcomes relevant to the CDC Assessment project; each is rated on a three-point scale.

Housing Production. Whether the package directly enables or removes barriers to the construction of new housing units. Packages that affect density allowances, permitted uses, or approval processes for residential development are most likely to rate high.

Housing Affordability. Whether the package supports production of income-restricted affordable housing or housing types that are more affordable by design (e.g., smaller units, cottage clusters, manufactured housing). This sub-criterion distinguishes between packages that increase overall housing supply and those that specifically address affordability.

Access to Opportunity. Whether the package affects housing production in well-resourced locations, meaning areas with access to transit, services, and employment. Packages that address barriers to housing density in mixed-use, commercial, or transit-oriented districts are most likely to rate high.

CDC Usability. Whether the package improves the clarity, consistency, navigability, or administrability of the CDC. This includes structural reorganization, consolidation of scattered provisions, improved formatting, and clarification of ambiguous standards. Packages that affect commonly used code sections or that staff and stakeholders have identified as significant usability problems rate higher.

Legal Compliance. Whether the package maximizes the County's compliance with state law to reduce exposure to legal challenges based on provisions that may not comply with current statutory requirements. This impact area captures risk beyond what the Urgency criterion addresses, including gray areas where compliance is uncertain and provisions that could be challenged.

Rating	Definition
Low	Minimal or limited effect on this expected outcome.
Moderate	A meaningful but bounded effect on this expected outcome.
High	A significant, broad effect on this expected outcome.

The table on page 6 in the Executive Summary summarizes the urgency and impact ratings for all 13 amendment packages. The table provides a separate rating for each of the five impact areas (Housing Production, Housing Affordability, Access to Opportunity, CDC Usability, and Legal Compliance) for Criteria 2: Impact.

TAC Discussion Questions:

- Do the three prioritization criteria (Urgency, Impact, and Feasibility) capture the right considerations for prioritizing CDC amendments? Is anything missing?
- Are the five Impact areas (Housing Production, Housing Affordability, Access to Opportunity, Code Usability, and Legal Compliance) the right measures of outcomes? Should any be added, removed, or redefined?

Criterion 3: Feasibility

Feasibility describes the resources and conditions required to implement the package. Three criteria points (Staff and Consultant Effort, External Dependencies and Internal Dependencies, described below) are rated. Note that for **Staff and Consultant Effort**, a higher rating indicates greater effort and therefore lower feasibility. This section is not included for feedback from the TAC, but it will be included in the final draft of the Priorities Report. The TAC's feedback is focused on the impact and urgency prioritization criteria above.

Staff and Consultant Effort. The work required to draft, review, and adopt the amendment package. This is the primary feasibility consideration. Factors that increase effort include the number of CDC sections affected, whether original policy development is needed versus

straightforward compliance drafting, the complexity of internal review, and the extent of public engagement required.

Rating	Definition
Low Effort	Limited drafting scope. Straightforward amendments to a small number of sections. Minimal policy development or technical research required.
Moderate Effort	Amendments span multiple sections or require some policy development, legal review, or stakeholder coordination.
High Effort	Amendments affect numerous sections, require significant policy development or technical analysis, involve multiple rounds of stakeholder review, or depend on coordination with external agencies.

External Dependencies. Whether implementation requires completion of a process outside the County's direct control, such as DLCD rulemaking, the Transportation System Plan update, or Housing Capacity Analysis / Housing Production Strategy completion. Packages with external dependencies cannot be fully adopted until those processes conclude, regardless of their urgency or impact ratings.

Rating	Definition
None	No external dependencies. The package can proceed on the County's own timeline.
Partial	Some items within the package depend on an external process, but other items can proceed independently.
Full	The package cannot be meaningfully advanced until an external process is complete.

Internal Dependencies. Whether the package depends on or would benefit from coordination with another package. Adopting packages with shared dependencies in a coordinated sequence reduces rework and ensures consistency.

Rating	Definition
Independent	The package can be adopted without reference to any other package.
Coordination Recommended	The package shares CDC sections, policy objectives, or structural elements with other packages. Coordinated adoption is more efficient but not strictly required.
Sequentially Dependent	The package cannot be coherently adopted until one or more other packages are in place.

The three criteria points will interact to inform sequencing of CDC amendment packages but do not individually determine their sequence. The following principles will guide how ratings translate into sequencing recommendations.

- Amendment packages with statutory deadlines or current compliance gaps will be sequenced first regardless of their impact or feasibility profile.

- Among packages without external time pressure, those with higher impact and lower effort requirements are stronger candidates for early adoption. High-impact packages that also require high effort may warrant early initiation even if adoption comes later.
- Packages with internal dependencies or coordination recommendations will be sequenced together where possible. Packages with external dependencies are positioned based on the expected timeline of the external process.
- Lastly, the packages will be examined holistically to assess the total effort across all packages in a given phase and must be realistic given available staff and consultant capacity. A high-priority package may need to be deferred if pursuing it simultaneously with other high-priority packages would exceed staff capacity.

Approach to Phasing

This section describes how the prioritization criteria will translate into a recommended sequencing of CDC amendment packages. The phasing will not be derived solely from the Criteria 2: Impact ratings. A framework that accounts for legal compliance, policy priorities, implementation capacity, and dependencies between packages will be applied.

The phasing approach will be presented to the Technical Advisory Committee as a draft for review and will be adjusted based on feedback from the TAC, County staff, and input gathered from previously held community in-person and virtual open house events. The framework provides transparency to the community and stakeholders regarding the County's phasing of amendment packages, so adjustments for the final draft of the Priorities Report can be made with a clear understanding of trade-offs.

Fixed Constraints

The following constraints apply regardless of how impact criteria are weighted:

- **Statutory deadlines.** Packages with statutory deadlines are sequenced first. Package 1 (Recent State Law Implementation) has firm compliance dates of January 1, 2027, and January 1, 2028, and must be prioritized accordingly.
- **External dependencies.** Packages contingent on external processes are phased based on the expected timing of those processes. The Transportation System Plan (TSP) update will trigger the need for certain amendments to be adopted. The Housing Capacity Analysis (HCA) and Housing Production Strategy (HPS) may inform the scale and nature of certain amendments upon their completion and adoption.
- **Capacity.** The total effort across code amendment packages in any given phase must be realistic given available staff and consultant capacity. Phases should not be overloaded with high-effort packages, even if those packages are high priority. Where a high-priority package requires significant effort, it may need to be initiated early even if adoption comes later.

Compliance Status

Several packages address areas where the County may not be in full compliance with current statutory requirements. These packages are generally prioritized over packages with no external deadline. Packages that address clear and specific statutory requirements carry more weight than packages addressing standards where compliance involves interpretation or professional judgment.

Phasing Scenarios

The five impact areas (Housing Production, Housing Affordability, Access to Opportunity, CDC Usability, and Legal Compliance) reflect different policy objectives. How these criteria are weighted relative to one another affects which packages are prioritized among those without fixed constraints. Rather than prescribing a single policy priority, this framework presents three scenarios reflecting different policy emphases. Each scenario applies the same fixed constraints and capacity limits but differs in how it ranks packages based on impact. The scenarios make trade-offs visible and support a discussion about the County's preferred emphasis.

Scenario A: Housing Impact

Packages with High ratings on Housing Production, Housing Affordability, or Access to Opportunity are sequenced first. Packages that directly remove barriers to housing or expand housing opportunities in well-served locations come earlier, with CDC usability, structural improvements, and any remaining legal compliance issues following.

Scenario B: Balanced

All five impact areas in Criteria 2: Impact are weighted equally: Housing Production, Housing Affordability, Access to Opportunity, CDC Usability, and Legal Compliance. Packages that score well across multiple criteria are elevated over packages that score high on one dimension but low on others. This balances housing outcomes with CDC functionality improvements.

Scenario C: CDC Modernization

CDC amendment packages with "high" ratings for CDC Usability are prioritized alongside compliance-driven packages. A well-organized CDC makes subsequent substantive amendments easier to draft, adopt, and administer. It also makes it easier for developers and community members to understand and submit land use applications, which saves time and effort. Structural reorganization and consolidation come first, with housing-focused amendments layered in afterward.

Community and Stakeholder Input

Each of the scenarios above will be used to create a draft recommended amendment package sequence, which will then be adjusted based on input from the TAC and previously held in-person and virtual community open house. Fixed constraints (statutory deadlines, external dependencies, and capacity limits) apply regardless of input received.

TAC Discussion Questions:

- Are there CDC amendment packages that should be prioritized earlier or later than the framework suggests, based on community needs or conditions on the ground?
- Are there any dependencies between packages, such as connections to other County, regional, or state initiatives, that should be factored into the sequencing?
- Do you have a preferred scenario for phasing the amendment packages?