

FINAL DRAFT MEMORANDUM

Date:	May 7, 2024
То:	Paul Dennis, Senior Planner – Jackson Civil
From:	Eli Mulberry, AICP – Planner
Subject:	Housing Needs and Land Capacity Summary – City of Winlock

1. Background

This memo discusses the results of Winlock's Land Capacity analysis to determine housing, population, and employment land capacities. This helps determine whether the jurisdiction has adequate land densities and buildable lands to accommodate future growth. This analysis used the GIS option and methods established by Lewis County, supplemented with guidance for the Department of Commerce for allocating housing by income bracket.

This study analyzed housing capacity according to new 2021 Washington House Bill 1220 requirements, which updated the Growth Management Act (GMA). The new legislation requires that jurisdictions plan for very low-, low-, and moderate-income housing needs when conducting their Comprehensive Plan updates. Jurisdictions are required to demonstrate that land capacity exists in their Urban Growth Areas for housing types that meet these income needs. In other words, *do the current zoning and development regulations allow housing types and quantities that meet need by income bracket*. Whether development occurs to meet this need ultimately depends on private market trends.

This analysis finds that the City has sufficient buildable lands to meet population, housing, and employment targets.

The following Exhibits show the Lewis County provided population and housing targets.

City (Incorporated + UGA)	ty 2022 Total 2045 Population A) Allocation		20-Year Population Increase	20-Year Growth Rate					
Winlock	2,115	4,756	2,641	124.87%					

Exhibit 1 – Population Targets



Exhibit 2 – Housing Targets

· · · ·			Permanent Housing Needs by % of Area Median Income						ncome	EH
Total 2045 Populati	ion = 104,951		0-3	0%						
		Total	Non- PSH	PSH	>30-50%	> 50-80 %	>80- 100%	>100- 120%	>120%	
Unincorporated	Estimated Housing Supply (2020)	19,519	667	25	3,146	4,704	2,798	2,016	6,163	0
Lewis County	Allocation Method C (2020-2045)	403	88	38	115	58	28	23	53	21
City of Centralia	Estimated Housing Supply (2020)	7,593	578	14	1,614	3,154	1,153	302	778	38
	Allocation Method C (2020-2045)	767	227	184	0	0	0	134	222	78
City of Chehalis	Estimated Housing Supply (2020)	3,139	140	0	442	1,537	509	140	371	22
	Allocation Method C (2020-2045)	6,215	1,390	563	1,000	900	425	280	1,657	332
City of Morton	Estimated Housing Supply (2020)	506	16	0	167	221	69	8	25	0
	Allocation Method C (2020-2045)	23	5	1	4	3	2	1	7	1
City of Mossyrock	Estimated Housing Supply (2020)	322	10	0	160	108	14	7	23	0
	Allocation Method C (2020-2045)	72	16	5	12	7	5	4	24	4
City of Napavine	Estimated Housing Supply (2020)	718	11	0	135	286	120	42	124	0
	Allocation Method C (2020-2045)	477	89	28	90	75	28	32	135	16
City of Pe Ell	Estimated Housing Supply (2020)	284	6	0	90	157	9	6	16	0
	Allocation Method C (2020-2045)	10	2	1	2	1	1	1	3	1
City of Toledo	Estimated Housing Supply (2020)	303	5	0	64	152	30	13	39	0
	Allocation Method C (2020-2045)	845	92	27	139	210	125	40	211	16
City of Vader	Estimated Housing Supply (2020)	257	0	0	100	90	43	6	18	0
	Allocation Method C (2020-2045)	100	30	7	0	6	2	10	45	5
City of Winlock	Estimated Housing Supply (2020)	564	30	0	121	323	32	16	42	0
	Allocation Method C (2020-2045)	1,248	271	115	282	210	83	50	237	67
Total	Sum of Allocations to Jurisdictions	10,160	2,210	969	1,643	1,471	698	575	2,594	542
	Percent of Sum of Allocations to Jurisdictions	100.00%	21.75%	9.54%	16.17%	14.48%	6.87 %	5.66%	25.53%	5.33%

2. Housing Capacity Analysis

2.1 Housing Assumptions

To determine the number of units that can reasonably be accommodated under the land capacity, this analysis uses an assumed density, rather than the maximum zoned density. An assumed density considers both the existing built density and likely density of further development.¹ Where there was a choice, or a scale of possible densities, we selected the most conservative number. The following, Exhibit 3, establishes the assumed housing densities for this analysis. Considering recent annexations, this analysis combined both UGA and incorporated lands.

¹ Department of Commerce. "Draft Guidance for Evaluating Land Capacity to Meet All Housing Needs." Washington State Department of Commerce, 2022 <u>https://deptofcommerce.app.box.com/s/k14gbqe7z8d7ek6z8ibui79zb7bo9vpa</u>.



Exhibit 3 – Assumed Housing Densities

Zone	Assumed density (du/acre)	Comments
LDR 10	4	Minimum density established under zoning.
LDR 6	4	Minimum density established under zoning.
MDR	8	Minimum density established under zoning.
MX	8	Minimum density established under zoning. This is the du/acre of the entire site despite being mixed use, based on local zoning code.

Under the Commerce guidance, to compare land capacity with housing need by income band, the analysis needs to assume, based on existing housing diversity and local conditions, what income levels the existing zones reasonably accommodate.² For example, if a single-family residential zone has land values and home costs that would not be affordable to lower income brackets, the analysis allocates the capacity in that zone to higher income brackets using a ratio. Some zones may have housing types that serve multiple income brackets. The analysis adjusted the ratio weights to reflect this. The following Exhibit lists each bracket and the zones that the zones that provide housing affordable to this level. Appendix A discloses the exact allocation ratios by zone and Area Median Income (AMI) level.

Exhibit 4 – Assumed Zones Serving Income Levels

Income Level	Income Bracket	Zones with Housing Serving Each Income Level
0-30% AMI	\$0 - \$20,174	MDR, MX
30-50% AMI	\$20,174 - \$33,624	MDR, MX
50-80% AMI	\$33,624 - \$53,798	MDR, MX
80-100% AMI	\$53,798 - \$67,247	LDR 6, MDR, MX
100-120% AMI	\$67,247 - \$80,696	LDR 10, LDR 6
>120% AMI	\$80,696+	LDR 10, LDR 6

2.2 Housing Capacity Results

To determine the total net residential acreage, we first deducted critical areas and percentage deduction factors for infrastructure, future public uses, and market forces. We then converted acreage to housing units based on the assumed density by zone. The results of this analysis are summarized in the following Exhibit 5. See Appendix B for the full deduction factors and calculations.

² Department of Commerce. "Draft Guidance for Evaluating Land Capacity to Meet All Housing Needs." Washington State Department of Commerce, 2022 <u>https://deptofcommerce.app.box.com/s/k14gbqe7z8d7ek6z8ibui79zb7bo9vpa</u>.



Zone	Net Developable Acres	Residential Capacity (units)	Pipeline Units	Total Units (Capacity + Pipeline)
LDR 10	191.4	766	0	766
LDR 6	70.9	284	630	914
MDR	93.0	744	426	1,170
MX	60.7	486	334	820
Total	416.0	2.279	1390	3,669

Exhibit 5 – Housing Capacity

To assess whether this unit capacity could potentially ensure sufficient housing for population growth, the analysis deducted units based on the local occupancy rates and converted units to individuals based on the local average household size. The US Census Bureau provides the data for census places and tracts for occupancy and household size statistics. We then compared the future population demand target established in Exhibit 1 with the total population capacity to determine whether the jurisdiction has sufficient capacity for future population growth, as seen below in Exhibit 6.

Zone	Total Unit Occupancy Capacity Rate*		Total Occupied Units	Population Capacity (persons) ⁺	
LDR 10	766	93%	709	2,312	
LDR 6	914	93%	846	2,759	
MDR	1,170	93%	1,083	3,532	
MX	820	93%	759	2,474	
	11,077				
	2,641				
	8,436				

Exhibit 6 – Population Capacity Results

*Based on latest OFM and Census estimates.

*Based on the latest Census estimate for the local average household size of 2.65.

After allocating housing capacity based on our housing affordability assumptions, we can determine whether there is sufficient land and density to accommodate housing demands by income level, shown in. Exhibit 7.



Exhibit 7 –	UGA+Incor	porated Ho	using Need	Sumlus	/Deficit Results
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Income Level	Income Bracket	Zones Serving Income Levels	Projected Housing Need	Allocated Units	Surplus/ (Deficit)
0-30% AMI	\$0 - \$20,174	MDR, MX	386	497	111
30-50% AMI	\$20,174 - \$33,624	MDR, MX	282	497	215
50-80% AMI	\$33,624 - \$53,798	MDR, MX	210	497	287
80-100% AMI	\$53,798 - \$67,247	LDR 6, MDR, MX	83	726	643
100-120% AMI	\$67,247 - \$80,696	LDR 10, LDR 6	50	611	561
>120% AMI*	\$80,696+	LDR 10, LDR 6	237	840	603
Total			1,248	3,669	2,421

*HB 1220 does not require jurisdictions to demonstrate policy changes to meet sufficient capacity for upper incomes.

3. Employment Capacity Analysis

3.1 Employment Assumptions

To convert total land area into net employment capacity area, we must make a few assumptions. First is the assumed density for employment area. We used Floor Area Ratio (FAR) as our measure of employment density. The assumed FAR by zone used in the analysis are established below in Exhibit 8.

Zone	Assumed FAR	Comments
C1	0.6	This zone covers much of the jurisdiction's downtown businesses. A lot of the older buildings appear to be FAR 1. However, given their code's requirements on landscaping and parking, these would likely be unallowed under the current zoning, so this has been reduced.
C2	0.3	This is zoned by the interchange, so we examined nearby examples from adjacent interchanges. Uses are dominated by low density business uses such as fast-food retail and gas stations.
LI	0.3	Based on zoning, a max would be a FAR .5, assuming one story. Existing local buildings are a bit less based on assessor data.
МХ	0.6	This zone currently has a lot of vacant land. Assuming most buildings are one-story developments given local building patterns and based on development regulations, the zoned max would be a 0.85 FAR. However, we reduced this to be more conservative.

Exhibit 8 – Assumed Employment Densities



This analysis divides job calculations into three employment sectors: industrial, general commercial, and retail. To estimate employment capacity, we follow the Lewis County methodology for Land Capacity Analysis, which allocates square footage per employee as follows: 650 square feet for industrial jobs, 400 square feet for general commercial jobs, and 600 square feet for retail jobs.

Given that nonresidential zones can host multiple types of businesses, we've used allocation ratios to distribute the employment capacity among the three sectors. As a starting point, these ratios were derived by analyzing developed parcels within each zone, identifying the proportion of parcels engaged in industrial, commercial, or retail activities. This approach is based on the premise that the distribution of future jobs will mirror the current pattern of employment across these sectors within the area. These ratios were then adjusted based on a review of the jurisdictions' permitted use table to best reflect the intent of the zone, rather than existing uses alone. Exhibit 9 provides a detailed breakdown of these assumptions.

Zone	Industrial	General Commercial	Retail	
C1	0%	50%	50%	
C2	0%	0%	100%	
LI	100%	0%	0%	
MX	0%	50%	50%	

Exhibit 9 – Assumed Employment Allocation Ratios

Numbers total to 100% by row

3.2 Employment Capacity Results

This analysis determined the total net developable land by deducting critical areas and percentage deduction factors for infrastructure, future public uses, and market forces. We then multiplied this net capacity with our assumed densities from Exhibit 8 to find net capacity square footage. Lastly, to consider occupancy and vacancy rates for businesses and leasing space, we assumed a 95% occupancy rate to find the total occupied capacity square footage, found in the following Exhibit 10. See Appendix B for the full deduction factors and calculations.

To convert square footage capacity into jobs, we first allocated a percentage of the square footage capacity into each of the employment sectors for analysis: industrial, general commercial, and retail using the assumptions established in Exhibit 9. We then converted square footage into jobs by dividing by our assumed square footage per employee. The total job capacity for each zone is shown in Exhibit 10.



Exhibit 10 – Employment Capacity Results

Total		Indu	strial	General Commercial Retail		Total Job		
Zone	Occupied Sq. Ft. Capacity	Land Capacity (sq. ft)	Jobs	Land Capacity (sq. ft)	Jobs	Land Capacity (sq. ft)	Jobs	Capacity
C1	186,404	-	-	93,202	233	93,202	155	388
C2	501,698	-	-	-	-	501,698	836	836
LI	3,818,298	3,818,298	5,874	-	-	-	-	5,874
MX	1,944,806	-	-	972,403	2,431	972,403	1,621	4,052

Given that we know the projected housing unit demand, we can then use the American Community Survey's estimates for job status by households and family to find an average jobs per household number.³ We then multiplied this rate with housing unit demand to determine employment demand.

To determine the projected employment capacity surplus or deficit, we then subtracted demand from total employment capacity, shown in the following Exhibit 11.

Exhibit 11 – Employment Demand Surplus/ Deficit Results

Employment Demand	
20-Year Housing Unit Demand Increase (dwelling units)	1,248
Assumed jobs / household	1.22
20-year employment demand (jobs)	1,523
<i>Total Employment Capacity (jobs)</i> Total job capacity (Incorporated + UGA)	11,150
Projected Surplus/ (Deficit)	
Total surplus/ (deficit) (jobs)	9,628

³ 2022 ACS, Employment Characteristics of Families (S2302). Family and household are not counted the same by the US Census, but we used family as a proxy.

Appendix A

The following table shows the allocation ratios used to allocate zoned capacity to income bracket. This method recognizes that zones can accommodate more than a single income level or bracket. Ratios add up to 100% by row. The ratios are multiplied with the zone's unit capacity to determine the estimated units at each income level.

Residential Zones	0-30% AMI	30-50% AMI	50-80% AMI	80-100% AMI	100-120% AMI	>120% AMI
LDR 10					0.50	0.50
LDR 6				0.25	0.25	0.50
MDR	0.25	0.25	0.25	0.25		
MX	0.25	0.25	0.25	0.25		

Assumed Housing Allocation Ratios Table



Appendix B

Formulas and calculations:

Critical areas were deducted in GIS.

Net Developable = ((Gross Dev. Land minus critical areas * (1- Future Use Deduction)) * (1 – Infrastructure Deduction)) * (1 – Market Factor Deduction) Total Capacity = Net Developable acres * Assumed Density Total Occupied Employment Capacity (sq. ft) = Total Sq. Foot Capacity * Occupancy Rate. We used an occupancy rate of 95%.

Buildable Acre Capacities and Deductions - Housing

Zone	Gross Developable Land minus critical areas (acres)		ole Land as (acres)	Future	Public Use [Deduction	Infrast	ructure Dedu	iction	Marke	et Factor Ded	uctions	Net	Developabl	e Land (ad	cres)	Total Dwelling	Pipeline/ Recently	Total Units (Capacity +
	Vacant	Partially- utilized	Under- utilized	Vacant	Partially- utilized	Under- utilized	Vacant	Partially- utilized	Under- utilized	Vacant	Partially- utilized	Under- utilized	Vacant	Partially- utilized	Under- utilized	Total	Capacity	Bullt	Pipeline)
LDR 10	100.10	244.48	0.31	5%	5%	5%	25%	25%	25%	15%	25%	25%	60.6	130.6	0.2	191.4	766	0	766
LDR 6	82.52	36.86	2.33	5%	5%	5%	25%	25%	25%	15%	25%	25%	50.0	19.7	1.2	70.9	284	630	914
MDR	74.37	0.00	89.75	5%	5%	5%	25%	25%	25%	15%	25%	25%	45.0	0.0	48.0	93.0	744	426	1170
MX	31.25	0.00	78.16	5%	5%	5%	25%	25%	25%	15%	25%	25%	18.9	0.0	41.8	60.7	486	334	820

Residential Deductions Summary							
Total gross developable land (minus critical areas)	740.2						
Future Public Use - total acres deducted	37.0						
Infrastructure - total acres deducted	175.8						
Market Factor - total acres deducted	111.3						
Total net developable acres	416.1						
Total dwelling unit land capacity	2,279						
Total pipeline units	1,390						
Grand total units	3,669						

Zone	Gross minus	Developabl critical areas	e Land s (acres)	Future	Public Use De	duction	Infrasti	ructure Dedu	uction	Market	Factor Ded	uctions	Ne	et Developab	le Land (ac	res)	Total Sq. Foot	Total Occupied Employment	Pipeline Employment	Total Employment Capacity
	Vacant	Partially- utilized	Under- utilized	Vacant	Partially- utilized	Under- utilized	Vacant	Partially- utilized	Under- utilized	Vacant	Partially- utilized	Under- utilized	Vacant	Partially- utilized	Under- utilized	Total	Capacity	Capacity (sq. ft)	Sq. Footage	(sq. ft)
C1	8.33	0.00	1.95	5%	5%	5%	25%	25%	25%	15%	25%	25%	5.0	0.0	1.0	6.1	195,585	185,806	599	186,404
C2	51.97	0.00	2.56	5%	5%	5%	25%	25%	25%	15%	25%	25%	31.5	0.0	1.4	32.8	527,677	501,293	405	501,698
LI	328.20	0.00	96.10	5%	5%	5%	25%	25%	25%	15%	25%	25%	198.8	0.0	51.4	250.1	4,018,927	3,817,981	317	3,818,298
MX	54.90	0.00	56.99	5%	5%	5%	25%	25%	25%	15%	25%	25%	33.2	0.0	30.5	63.7	2,047,164	1,944,806	-	1,944,806

Buildable Acre Capacities and Deductions – Employment

Employment Deductions Summary								
Total gross developable land (minus critical areas)	601.0							
Future Public Use - total acres deducted	30.0							
Infrastructure - total acres deducted	142.7							
Market Factor - total acres deducted	75.5							
Total net developable acres	352.7							
Total Sq. Foot Capacity	6,789,353							
Total occupied sq. ft. land capacity	6,789,353							
Total pipeline sq. ft.	1,321							
Grand total employment capacity (sq. ft)	6,451,206							



Appendix C

This appendix lists this analysis' assumptions and disclosures when implementing the methodology. It also includes disclosures of data limitations.

GIS Analysis Process Assumptions and Data Limitations

- Critical area buffers for deducting nonresidential parcels. All jurisdictions do not have a published critical areas code chapter on their respective code publishing or municode websites. Or, they adopt the County codes by reference. This analysis therefore used county buffer distances for all analysis jurisdictions. The adopted county codes for wetland and stream buffers are based on category and impact.
 - Since the wetland database does not include wetland category or score, nor are we able to identify impact level without a site-level biological study, we took an average buffer size of 120 feet to apply for simplicity to avoid doing a site-by-site GIS analysis.
 - Using DNR stream data, we applied a buffer distance of 150 feet for Fish-containing streams, which is the buffer distance for Type F waters under Lewis County Code 17.38.420. For unknown, non-fish, and waters with no type or designation, we used a buffer distance of 75 feet based on LCC.
 - Shoreline buffers. For streams that are designated shorelines, this analysis used the buffer areas identified in the local Napavine and Winlock SMP's.
 - Winlock Shoreline buffer for High Intensity: 250 feet. While a buffer of 100 feet is allowed for water-related structures, we used 250 feet for a more conservative estimate. No buffer for Shoreline Residential District and Urban Conservancy.
- There are several parcels in all cities that are split by zone. To control this, this analysis split these parcels using an intersect geoprocess in GIS to find the gross acreage by zone.
- There are several parcels in all cities that straddle the boundary. Like zoning, these parcels were split using an intersect to only calculate areas within the city boundary and UGA.

Deductions and Assumed Densities

- The criterion for partially-used in the Lewis County methodology has conflicting logic: "Don't count parcels with improvement values >93rd percentile of jurisdiction improvement values unless the parcel is sized 3 times the minimum allowed under zoning." This is the same criteria as is applied for the rest: "Parcel size >3 times the minimum allowed under zoning." We applied this literally and counted all parcels >3 times the minimum.
- For determining a reasonable allocation ratio for jobs under industrial, retail, and general commercial, we assumed that capacity would be split across these sectors consistent with existing splits. To determine existing splits, we isolated developed parcels and used assessor <u>land use</u> <u>codes</u> to classify them under these three categories. The ratios were then adjusted based on the permitted use tables in the development regulations to better reflect intended uses in each zone.
 - o Industrial included codes related to manufacturing, transportation, and resource extraction

- **21-49**
- 81-89
- o General commercial included codes related to services:
 - 61-69
- Retail included codes related to trades:
 - **50-59**

The following tables disclose acreage deducted in GIS for critical areas.

Residential Zone	City	UGA	Total
LDR 10	18.2	215.6	233.9
LDR 6	428.3	78.1	506.5
MDR	274.9	40.8	315.7
MX	39.6	93.1	132.7
PF	130.0	2.6	132.6
Total	891.1	430.2	1,321.4

Commercial Zones	City	UGA	Total
C1	305	0	305
C2	0	187	187
LI	296	92	387
MX	46	109	155
Grand Total	647	387	1,034

The following parcels were identified as being built or having active plats/plans to develop. These were excluded from the model and included as "pipeline" capacity.

Parcel	City	Use	Development Name / Notes
15436002000	Winlock	residential	Mitchel Homes
15413002003	Winlock	residential	Mitchel Homes
6292002000	Winlock	residential	Grant Ave homes
6291002000	Winlock	residential	Grant Ave homes
6290002000	Winlock	residential	Grant Ave homes
15419001000	Winlock	residential	Hidden highlands
15634001001	Winlock	public/utility/easement	public/utility/easement
15634001002	Winlock	public/utility/easement	public/utility/easement
15634013067	Winlock	public/utility/easement	public/utility/easement
6526009000	Winlock	commercial	mini storage
15384015000	Winlock	residential	Winlock Heights
6526014000	Winlock	residential	Creswood Heights
15638007009	Winlock	commercial	storage
15638007008	Winlock	commercial	storage
15638007007	Winlock	commercial	storage
15589000000	Winlock	public/utility/easement	PUD substation

Parcel	City	Use	Development Name / Notes
15631008001	Winlock	residential	Hilltop Meadows
15631008002	Winlock	residential	Hilltop Meadows
15354001010	Winlock	both	water tower
15633008000	Winlock	mixed	Skyhawk Summit. 5.41 acres commercial
6523003002	Winlock	residential	Heights of Winlock
6438000000	Winlock	residential	Double H Investments
6435000000	Winlock	residential	Double H Investments
6487000000	Winlock	residential	Window Short Plat
6201001000	Winlock	residential	Winlock Estates (Tapani)
6201002000	Winlock	residential	Winlock Estates (Tapani)
620000000	Winlock	residential	Winlock Estates (Tapani)
6202000000	Winlock	residential	Winlock Estates (Tapani)
620900000	Winlock	residential	Winlock Estates (Tapani)
6213000000	Winlock	residential	Winlock Estates (Tapani)
6296002000	Winlock	residential	Graham Acres
6306002000	Winlock	residential	Graham Acres
15591002000	Winlock	residential	Bear Creek Landing
15588001000	Winlock	residential	Bear Creek Landing
6282004000	Winlock	residential	Shannon Lewis mobile homes
6543001016	Winlock	residential	Hawks View Lane subdivision
6543001017	Winlock	residential	Hawks View Lane subdivision
6543001018	Winlock	residential	Hawks View Lane subdivision
6543001019	Winlock	residential	Hawks View Lane subdivision
6543001020	Winlock	residential	Hawks View Lane subdivision
6543001021	Winlock	residential	Hawks View Lane subdivision
6543001022	Winlock	residential	Hawks View Lane subdivision
6543001023	Winlock	residential	Hawks View Lane subdivision
6543001024	Winlock	residential	Hawks View Lane subdivision
6543001025	Winlock	residential	Hawks View Lane subdivision
6543001026	Winlock	residential	Hawks View Lane subdivision
6543001027	Winlock	residential	Hawks View Lane subdivision
6543001028	Winlock	residential	Hawks View Lane subdivision
6543001015	Winlock	residential	Hawks View Lane subdivision
6543001003	Winlock	residential	Hawks View Lane subdivision
6543001014	Winlock	residential	Hawks View Lane subdivision
6543001013	Winlock	residential	Hawks View Lane subdivision
6543001012	Winlock	residential	Hawks View Lane subdivision
6543001011	Winlock	residential	Hawks View Lane subdivision
6543001010	Winlock	residential	Hawks View Lane subdivision
6543001009	Winlock	residential	Hawks View Lane subdivision
6543001008	Winlock	residential	Hawks View Lane subdivision
6543001007	Winlock	residential	Hawks View Lane subdivision

Parcel	City	Use	Development Name / Notes
6543001006	Winlock	residential	Hawks View Lane subdivision
6543001005	Winlock	residential	Hawks View Lane subdivision
6543001004	Winlock	residential	Hawks View Lane subdivision
15625002005	Winlock	residential	Martin Development
15625002003	Winlock	residential	Martin Development
15625002004	Winlock	residential	Martin Development
15588003001	Winlock	commercial	Frogmore
15384020059	Winlock	commercial	Peregrine Place
11966003003	Winlock	commercial	Shell expansion
15354001009	Winlock	commercial	Benaroya/Crow
15354001002	Winlock	commercial	Benaroya/Crow