

DRAFT REPORT

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**COMPREHENSIVE PLAN PERIODIC  
UPDATE – HOUSING ELEMENT  
TECHNICAL ANALYSIS  
CLALLAM COUNTY**

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Prepared for: Clallam County  
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The information contained in this report is based on the application of technical guidelines currently accepted as the best available science and in conjunction with the manuals and criteria outlined in the methods section. All discussions, conclusions and recommendations reflect the best professional judgment of the author(s) and are based upon information available at the time the study was conducted. All work was completed within the constraints of budget, scope, and timing. The findings of this report are subject to verification and agreement by the appropriate local, state and federal regulatory authorities. No other warranty, expressed or implied, is made.

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# 1 Introduction

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The Clallam County Comprehensive Plan Periodic Update must be acted upon by the Board of County Commissioners before December 31, 2025.

Comprehensive plans are required to comply with the procedural and substantive requirements of RCW 36.70A. Substantively, the elements of the comprehensive plan must comply with RCW 36.70A.070 (and .080 for optional elements). HB 1220, which was signed into law in 2021, amended the GMA to instruct local governments to “plan for and accommodate” housing affordable to all income levels. This significantly strengthened the previous language, which was that local governments must “encourage” affordable housing.

## 1.1 Housing Element Requirements

The statute amendment also directed Commerce to project future housing needs for jurisdictions by income bracket and made significant updates to how jurisdictions are to plan for housing in the housing element of the comprehensive plan. Per these amendments, the Housing Element must now include:

- **Planning for sufficient land capacity for housing needs**, including all economic segments of the population (moderate, low, very low and extremely low income, as well as emergency housing and permanent supportive housing).
- **Providing for moderate density housing options within Urban Growth Areas (UGAs)**, including but not limited to duplexes, triplexes and townhomes.
- **Making adequate provisions for housing for existing and projected needs for all economic segments of the community**, including documenting programs and actions needed to achieve housing availability.
- **Identifying racially disparate impacts, displacement, and exclusion** in housing policies and regulations, and beginning to undo those impacts; and identifying areas at higher risk of displacement and establishing anti-displacement policies.

This memo provides details on Clallam County’s response to all these requirements. Commerce provides guidance on preparing various comprehensive plan elements and step-by-step instructions in how to demonstrate that the land capacity analysis identifies sufficient capacity of land to accommodate all projected housing needs during the twenty-year planning horizon:

- Establishing Housing Targets for Your Community: County-level considerations for housing planning (July 2023)
- Guidance for Updating Your Housing Element: Updating your housing element to address new requirements (August 2023)

## 1.2 Development of Housing Allocations

As a precursor to this analysis and in accordance with RCW 36.70A.070(2) and WAC 396-196-325, Clallam County adopted housing allocations for the 20-year planning horizon (see Appendix A, Resolution 101, 2024). The allocations included projected housing needs for the incorporated cities of Sequim, Port Angeles, and Forks; the unincorporated UGAs of Sequim, Carlsborg, Port Angeles, Joyce, Clallam Bay/Seki, and Forks; and unincorporated rural Clallam County. These allocations were based on the countywide population projections provided by the Washington Office of Financial Management, medium population projection. With the assistance of the Housing for All Planning Tool (HAPT), Method C as provided by the Washington Department of Commerce, the allocations were further divided into the number of housing units required for each income segment specified under RCW 36.70A.070(2). The adopted allocations are summarized in Table 1 (next page).

Overall, Clallam County must plan for and accommodate 1,849 permanent housing units in the unincorporated areas in its jurisdiction from the 2020 baseline through 2045, plus capacity for 76 emergency housing beds.

This report documents how Clallam County is providing capacity for permanent and emergency housing allocations by income bracket in accordance with published Commerce guidance.

	0-30% AMI							Emergency Housing (temp)	Total
	Non-PSH *	PSH *	>30-50%	>50-80%	>80-100%	>100-120%	>120%		
City of Forks	100	45	92	37	13	10	2	27	<b>326</b>
Forks UGA	10	5	9	4	1	1	0	3	<b>33</b>
City of Port Angeles	664	299	605	241	85	63	13	173	<b>2143</b>
Port Angeles UGA	100	45	91	37	13	10	2	27	<b>325</b>
City of Sequim	623	280	568	227	80	61	11	164	<b>2014</b>
Sequim UGA	100	45	91	37	13	10	2	27	<b>325</b>
Clallam Bay/Sekiu UGA	10	5	9	4	1	1	0	3	<b>33</b>
Joyce UGA	0	0	0	0	0	0	0	0	<b>0</b>
Carlsborg UGA	60	27	55	22	8	6	1	16	<b>195</b>
Unincorporated Rural	<u>0</u>	<u>0</u>	<u>0</u>	<u>124</u>	<u>44</u>	<u>34</u>	<u>812</u>	<u>0</u>	<b><u>1014</u></b>
<b>Total:</b>	<b><u>1667</u></b>	<b><u>751</u></b>	<b><u>1520</u></b>	<b><u>733</u></b>	<b><u>258</u></b>	<b><u>196</u></b>	<b><u>843</u></b>	<b><u>440</u></b>	<b><u>6408</u></b>

Table 1. HAPT Tool Methodology C Output, Clallam County.

Notes: Due to rounding in the tool output, the totals for individual jurisdictions may differ from the subtotals by one housing unit. PSH means Permanent Supportive Housing.

## 2 Land Capacity Analysis

### 2.1 Summary

Clallam County has completed a land capacity analysis as part of the comprehensive plan update. Capacity is provided in terms of net acres and net units by UGA.

### 2.2 Step 1: Summarize land capacity for housing production by zone

The LCA summarizes housing capacity by zone under current zoning for each UGA (reproduced here).

Zoning District	Development Status	Gross Residential Capacity in Zone		Capacity after Critical Area Deduction (12.6%)		Capacity after Market Deduction		Assigned Zone Category	Net Capacity in Zone Category	
		Units	Acres	Units	Acres	Units	Acres		Units	Acres
S(R-II)	Vacant	988	287.0	864	250.8	734	213.2	Moderate Density	<b>1,938</b>	<b>607.8</b>
	Partial use	1800	602.0	1573	526.1	1180	394.6			
S(R-III)	Vacant	64	17.6	56	15.4	48	13.1	High Density	<b>89</b>	<b>30.3</b>
	Partial use	18	11.0	16	9.6	12	7.2			
S(R-IV)	Vacant	10	2.2	9	1.9	7	1.6			
	Partial use	34	12.8	30	11.2	22	8.4			
ADU Capacity (based on Table 4. Units added to Moderate Density)						24				
<b>Total Gross Residential Capacity:</b>									<b><u>2,027</u></b>	<b><u>638.1</u></b>

Table 2. Net Residential Capacity, Sequim UGA

Zoning District	Development Status	Gross Residential Capacity in Zone		Capacity after Critical Area Deduction (3.3%)		Capacity after Market Deduction		Assigned Zone Category	Net Capacity in Zone Category	
		Units	Acres	Units	Acres	Units	Acres		Units	Acres
CR-I	Vacant	19	10.5	18	10.2	16	8.6	Moderate Density	<b>367</b>	<b>69.9</b>
	Partial use	117	34.8	113	33.7	85	25.2			
CR-II	Vacant	35	4.3	34	4.2	29	3.5	High Density	<b>579</b>	<b>61.6</b>
	Partial use	309	44.8	299	43.3	224	32.5			
CR-III	Vacant	364	38.6	352	37.3	299	31.7			
	Partial use	269	27.8	260	26.9	195	20.2			
CC *	Vacant	0	0.0	0	0.0	0	0.0			
	Partial use	61	6.9	59	6.7	45	5.0			
CN *	Vacant	26	2.5	25	2.4	21	2.1			
	Partial use	27	3.6	26	3.5	19	2.6			
ADU Capacity (based on Table 4. Units added to Moderate Density)						14				
<b>Total Gross Residential Capacity:</b>									<b><u>947</u></b>	<b><u>131.5</u></b>

(\*Mixed-use Zones Assume 33% residential, 67% Commercial.)

Table 3. Net Residential Capacity, Carlsborg UGA

Zoning District	Development Status	Gross Residential Capacity in Zone		Capacity after Critical Area Deduction (17.5%)		Capacity after Market Deduction		Assigned Zone Category	Net Capacity in Zone Category	
		Units	Acres	Units	Acres	Units	Acres		Units	Acres
VLD	Vacant	229	116.9	189	96.4	161	81.98	Low Density	<b>775</b>	<b>475.2</b>
	Partial use	243	180.0	200	148.5	150	111.4			
VLD/LD	Vacant	324	161.5	267	133.2	227	113.3			
	Partial use	383	272.5	316	224.813	237	168.6			
LD	Vacant	764	121.7	630.3	100.4	536	85.34	Moderate Density	<b>1,715</b>	<b>243.5</b>
	Partial use	1867	255.6	1540.3	210.9	1155	158.2			
MD	Vacant	429	52.7	354	43.5	301	37.0	High Density	<b>1,520</b>	<b>140.4</b>
	Partial use	1621	131.5	1337.3	108.488	1003	81.4			
URC *	Vacant	173	20.6	143	17.0	121	14.4			
	Partial use	153	12.3	126	10.2	95	7.6			
ADU Capacity (based on Table 4. Units added to Moderate Density)						24				
<b>Total Gross Residential Capacity:</b>									<b>4,010</b>	<b>859.1</b>

(\* Mixed-use Zones Assume 33% residential, 67% Commercial.)

Table 4. Net Residential Capacity, Port Angeles UGA

Zoning District	Development Status	Gross Residential Capacity in Zone		Capacity after Critical Area Deduction (23.5%)		Capacity after Market Deduction		Assigned Zone Category	Net Capacity in Zone Category	
		Units	Acres	Units	Acres	Units	Acres		Units	Acres
URH	Vacant	34	16.7	26	12.8	22	10.9	Low Density	<b>134</b>	<b>47.1</b>
	Partial use	195	63.1	149	48.3	112	36.2			
UC *	Vacant	124	24.9	95	19.1	81	16.2	Moderate Density	<b>250</b>	<b>44.8</b>
	Partial use	294.0	49.8	225	38.1	169	28.6			
ADU Capacity (based on Table 4. Units added to Moderate Density)						0				
<b>Total Gross Residential Capacity:</b>									<b>384</b>	<b>91.9</b>

(\* Mixed-use Zones Assume 33% residential, 67% Commercial.)

Table 5. Net Residential Capacity, Joyce UGA

Zoning District	Development Status	Gross Residential Capacity in Zone		Capacity after Critical Area Deduction (30.3%)		Capacity after Market Deduction		Assigned Zone Category	Net Capacity in Zone Category	
		Units	Acres	Units	Acres	Units	Acres		Units	Acres
URH	Vacant	1022	309.3	712	215.6	605	183.2	Low Density	<b>669</b>	<b>208.3</b>
	Partial use	122	48.0	85	33.5	64	25.1			
UC *	Vacant	327	66.6	228	46.4	194	34.8	Moderate Density	<b>266</b>	<b>49.3</b>
	Partial use	134	24.5	94	17.1	70	14.5			
ADU Capacity (based on Table 4. Units added to Moderate Density)						2				
<b>Total Gross Residential Capacity:</b>									<b>935</b>	<b>257.6</b>

(\* Mixed-use Zones Assume 33% residential, 67% Commercial.)

Table 6. Net Residential Capacity, Clallam Bay/Sekiu UGA

Zoning District	Development Status	Gross Residential Capacity in Zone		Capacity after Critical Area Deduction (28.3%)		Capacity after Market Deduction		Assigned Zone Category	Net Capacity in Zone Category	
		Units	Acres	Units	Acres	Units	Acres		Units	Acres
URL	Vacant	2,030	998.2	1,456	715.7	1,237	608.4	Low Density	<b>1,603</b>	<b>833.0</b>
	Partial use	680	417.8	488	299.6	366	224.7			
UC *	Vacant	53	9.2	38	6.6	32	5.6	Moderate Density	<b>1,278</b>	<b>162.7</b>
	Partial use	136	26.1	97	18.7	73	14.0			
LD	Vacant	925	103.9	663	74.5	564	63.3	High Density	<b>49</b>	<b>3.4</b>
	Partial use	1,129	148.2	809	106.3	607	79.7			
UNC *	Vacant	16	1.0	12	0.7	10	0.6	High Density	<b>49</b>	<b>3.4</b>
	Partial use	74	5.2	53	3.7	40	2.8			
ADU Capacity (based on Table 4. Units added to Moderate Density)						2				
<b>Total Gross Residential Capacity:</b>									<b>2,930</b>	<b>999.1</b>

(\* Mixed-use Zones Assume 33% residential, 67% Commercial.)

Table 7. Net Residential Capacity, Forks UGA

Zoning District	Development Status	Gross Residential Capacity in Zone		Capacity after Critical Area Deduction (18.2%)		Capacity after 40% Market Deduction		Assigned Zone Category	Net Capacity in Zone Category	
		Units	Acres	Units	Acres	Units	Acres		Units	Acres
AR	Vacant	397	3,568.1	325	2,918.7	195	1,751.2	Rural and Resource Density	6,799	200,573.5
	Partial use	21	563.3	17	460.8	10	276.5			
CF	Vacant	3,452	355,443.5	2,824	290,752.8	1,694	174,451.7			
	Partial use	63	7,429.2	52	6,077.1	31	3,646.3			
CFM20	Vacant	50	554.9	41	453.9	25	272.3			
	Partial use	6	181.8	5	148.7	3	89.2			
CFM5	Vacant	238	1,034.2	195	846.0	117	507.6			
	Partial use	85	568.7	70	465.2	42	279.1			
R20	Vacant	173	2,034.9	142	1,664.5	85	998.7			
	Partial use	14	616.7	11	504.5	7	302.7			
NC	Vacant	1,955	5,789.5	1,599	4,735.8	960	2,841.5			
	Partial use	136	1,357.4	111	1,110.4	67	666.2			
R5	Vacant	2,209	8,498.5	1,807	6,951.8	1,084	4,171.1			
	Partial use	453	3,805.3	371	3,112.7	222	1,867.6			
RW5	Vacant	1,094	4,646.5	895	3,800.8	537	2,280.5			
	Partial use	112	880.5	92	720.2	55	432.1			
R2	Vacant	67	86.2	55	70.5	33	42.3			
	Partial use	2	14.9	2	12.2	1	7.3			
R1	Vacant	551	479.2	451	392.0	270	235.2			
	Partial use	227	448.2	186	366.6	111	220.0			
RW1	Vacant	107	103.2	88	84.4	53	50.7			
	Partial use	47	57.7	38	47.2	23	28.3			
RSC	Vacant	114	123.1	93	100.7	56	60.4			
	Partial use	44	92.3	36	75.5	22	45.3			
RCC5	Vacant	335	2,103.3	274	1,720.5	164	1,032.3			
	Partial use	33	797.1	27	652.0	16	391.2			
RCC3	Vacant	491	2,794.6	402	2,286.0	241	1,371.6			
	Partial use	39	754.4	32	617.1	19	370.3			
RLM	Vacant	255	2,002.5	209	1,638.0	125	982.8			
	Partial use	160	1,271.8	131	1,040.3	79	624.2			
QR	Vacant	188	121.3	154	99.2	92	59.5			
	Partial use	194	141.5	159	115.7	95	69.4			
RC *	Vacant	16	7.0	13	5.7	8	3.4			
	Partial use	9	6.2	7	5.1	4	3.1			
RV *	Vacant	4	1.0	3	0.8	2	0.5			
	Partial use	1	0.6	1	0.5	0	0.3			
RV2 *	Vacant	2	1.1	2	0.9	1	0.6			
	Partial use	1	2.5	1	2.1	0	1.2			
DPA *	Vacant	15	7.2	12	5.9	7	3.5			
	Partial use	-	-	-	-	-	-			
CEN *	Vacant	15	6.9	12	5.6	7	3.4			
	Partial use	9	6.4	7	5.2	4	3.1			
WRC *	Vacant	327	166.1	268	135.8	161	81.5			
	Partial use	104	62.1	85	50.8	51	30.5			
RNC *	Vacant	4	4.4	3	3.6	2	2.1			
	Partial use	11	14.6	9	12.0	6	7.2			
TC *	Vacant	17	8.4	14	6.9	8	4.1			
	Partial use	9	7.7	7	6.3	4	3.8			
ADU Capacity (based on Table 4)						82		Moderate Density	82	

(\* Mixed-use Zones Assume 33% residential, 67% Commercial.)

Table 8. Net Residential Capacity, Rural Clallam County

This analysis, completed by Clallam County staff in partnership with ESRI in March 2025, addresses steps 1.1 through 1.5 of the Commerce housing element guidance to define development status, remove infrastructure gaps, critical areas, and other areas unlikely to develop, account for rights of way and future capital facilities, and determine net acres.

### 2.3 Additional capacity for ADUs on developed lots

ADUs provide opportunity for housing within the 50 percent to 120 percent AMI range, similar to the moderate-density category. While most stick-built ADUs might command rents at the upper end of this range (and possibly beyond), Modular, Manufactured homes, and tiny homes on wheels constructed and placed in accordance with State Building Code standards are also available options as ADUs that provide more affordability for this housing alternative.

Permit records for the past 20 years show a trend of approximately 15 ADUs constructed annually in unincorporated Clallam County. When related to residential building permits, ADUs track around 8.1 percent of the volume of new residential units.

Historic development patterns in unincorporated UGAs mostly include larger parcels at lower densities. Except for the Sequim UGA, most of the current parcels within the County’s UGAs were created prior to the 1990’s and homeowner associations and restrictive CC&Rs. The newer developments in Sequim are offset by a strong real estate market in that part of the County. These facts suggest there exists a high percentage of lots with capacity to accommodate ADU development. With increased opportunities in UGAs and demand for new rentals at a historic high, it can be assumed that new ADU construction will, at a minimum, continue at their current pace. It is expected that the average rate of 8.1 percent for new ADUs to new home construction will continue for the 20-year planning horizon. With these assumptions, ADU development capacity is estimated in Table 9 (below).

Jurisdiction	Total Housing Allocation	Estimated ADU Growth
Sequim UGA	298	24
Carlsborg UGA	179	14
Port Angeles UGA	298	24
Joyce UGA	0	0
Clallam Bay/Sekiu UGA	30	2
Forks UGA	30	2
Rural County	1014	<u>82</u>
<b>Total Anticipated ADUs:</b>		<b><u>150</u></b>

Table 9. ADU Development Capacity

### 3 Classify zones by allowed housing types and density levels

The next step of the analysis identifies which housing types are allowed in each zone to facilitate relating each zone category to potential affordability levels.

#### 3.1 Categories for classifying zones by housing types allowed

<b>Zone Category</b>	<b>Typical housing types allowed</b>
Low Density	Detached single-family homes
Moderate Density	Townhomes, duplex, triplex, quadplex
Low-Rise Multifamily	Walk-up apartments or condominiums (up to 3 floors)
Mid-Rise Multifamily	Apartments or condominiums in buildings with ~4 to 8 floors (~40-85 feet in height)

Table 10. Zone Categories and Housing Types Allowed

\*Manufactured homes not listed as a housing type because by law they should be allowed in all zones.

#### 3.2 Classifying land use zones using zone categories

Because Clallam County is for the most part a rural community, the range of housing types available in more urbanized areas of Washington State is not readily available. Even in the established urban areas of Port Angeles and Sequim, a three or four-story building is the exception.

Because of this, fewer options exist for the types of housing most suited for meeting extremely low and very low-income segments. Typically, multi-family apartments and similar higher-density developments are needed to create the economies of scale necessary for subsidized and low-income housing. However, flexible zoning allowing for the clustering of residential units combined with comparatively higher densities can still create opportunities for this and other income segment-appropriate housing. With this understanding, Table 11 (below) relates zoning categories to available housing types within those categories and the potential affordability range such units may produce.

Zone Category	Housing Types Allowed	Density Range	Lowest Potential Income Level Served		Assumed Affordability Level for Capacity Analysis
			Market Rate	With Subsidies and/or Incentives	
Rural Density	Detached Single Family Dwellings (SFD)	1 unit/acre and less	Higher Income (>120% AMI)	Not Feasible at Scale	Higher Income (>120% AMI)
Low Density	SFD/Duplexes	2-4 units/acre	Higher Income (>120% AMI)	Not Typically Feasible at Scale	Higher Income (>120% AMI)
Moderate Density	Duplexes/triplexes/small scale multi-family	5-9 units/acre	Moderate Income (>80-120% AMI)	Low to Moderate Income (>50-120% AMI)	Low and Moderate Income (>50-120% AMI)
High Density	Multi-family	10 units/acre and more	Low Income (>50-80% AMI)	Extremely low to Low-income (0-80% AMI)	Low Income (0-80% AMI) and PSH
ADUs (all Res. Zones)	Accessory dwelling units on developed residential lots	N/A	Moderate Income (>50-120% AMI)	N/A	Moderate Income (>50-120% AMI)

Table 11. Classification of Zone Categories using County Zones

## 4 Capacity by Zone Category and Comparison to Housing Need

The summary capacity by zone category by UGA is shown below. This sums the capacity per zone into the assigned zone category to determine capacity relative to need in the last step.

### 4.1 Capacity by Zone Category by UGA

Income Level (% AMI)	Projected Housing Need (HAPT C)	Zone Categories Serving Need Level	Aggregated Housing Needs	Total Capacity	Capacity Surplus or Deficit
0-30% Non PSH	100	High Density	236	89	<b>-147</b>
0-30% Non	45				
>30-50%	91				
>50-80%	37	Moderate Density	60	1,938	<b>1,876</b>
>80-100%	13				
>100-120%	10				
>120%	2	Low Density	2	Accommodated Above ↑	

Table 12. Capacity by Zone Category, Sequim UGA

Income Level (% AMI)	Projected Housing Need (HAPT C)	Zone Categories Serving Need Level	Aggregated Housing Needs	Total Capacity	Capacity Surplus or Deficit
0-30% Non PSH	60	High Density	142	579	<b>437</b>
0-30% Non	27				
>30-50%	55				
>50-80%	22	Moderate Density	36	367	<b>330</b>
>80-100%	8				
>100-120%	6				
>120%	1	Low Density	1	Accommodated Above ↑	

Table 13. Capacity by Zone Category, Carlsborg UGA

Income Level (% AMI)	Projected Housing Need (HAPT C)	Zone Categories Serving Need Level	Aggregated Housing Needs	Total Capacity	Capacity Surplus or Deficit
0-30% Non PSH	100	HighDensity	236	1,520	<b>1,284</b>
0-30% PSH	45				
>30-50%	91				
>50-80%	37	Moderate Density	60	1,715	<b>1,655</b>
>80-100%	13				
>100-120%	10				
>120%	2	Low Density	2	775	<b>773</b>

Table 14. Capacity by Zone Category, Port Angeles UGA

Zoning District	Development Status	Gross Residential Capacity in Zone		Capacity after Critical Area Deduction (23.5%)		Capacity after Market Deduction		Assigned Zone Category	Net Capacity in Zone Category	
		Units	Acres	Units	Acres	Units	Acres		Units	Acres
URH	Vacant	34	16.7	26	12.8	22	10.9	Low Density	<b>134</b>	<b>47.1</b>
	Partial use	195	63.1	149	48.3	112	36.2			
UC *	Vacant	124	24.9	95	19.1	81	16.2	Moderate Density	<b>250</b>	<b>44.8</b>
	Partial use	294.0	49.8	225	38.1	169	28.6			
ADU Capacity (based on Table 4. Units added to Moderate Density)						0				
<b>Total Gross Residential Capacity:</b>									<b>384</b>	<b>91.9</b>

(\* Mixed-use Zones Assume 33% residential, 67% Commercial.)

Table 15. Capacity by Zone Category, Joyce UGA (no growth has been assigned so the capacity indicates a surplus for the purposes of this analysis)

Income Level (% AMI)	Projected Housing Need (HAPT C)	Zone Categories Serving Need Level	Aggregated Housing Needs	Total Capacity	Capacity Surplus or Deficit
0-30% Non PSH	10	High Density	24	0	-24
0-30% PSH	5				
>30-50%	9				
>50-80%	4	Moderate Density	6	266	260
>80-100%	1				
>100-120%	1				
>120%	0	Low Density	0	669	669

Table 16. Capacity by Zone Category, Clallam Bay/Seki UGA

Income Level (% AMI)	Projected Housing Need (HAPT C)	Zone Categories Serving Need Level	Aggregated Housing Needs	Total Capacity	Capacity Surplus or Deficit
0-30% Non PSH	10	High Density	24	49	25
0-30% PSH	5				
>30-50%	9				
>50-80%	4	Moderate Density	6	1,278	1,272
>80-100%	1				
>100-120%	1				
>120%	0	Low Density	0	1,603	1,603

Table 17. Capacity by Zone Category, Forks UGA

Income Level (% AMI)	Projected Housing Need (HAPT C)	Zone Categories Serving Need Level	Aggregated Housing Needs	Total Capacity	Capacity Surplus or Deficit
0-30% Non PSH	0	High Density	0	0	0
0-30% PSH	0				
>30-50%	0				
>50-80%	124	Moderate Density	202	82	-120
>80-100%	44				
>100-120%	34				
>120%	812	Low/Rural Density	812	6,799	5,987

Table 18. Capacity by Zone Category, Rural Clallam County

### 4.3 Capacity by Zone Category Summary

As shown in the tables in the previous section, current zoning and land capacity is adequate to meet the housing needs of all income segments in the following GMA planning areas:

- Carlsborg UGA
- Port Angeles UGA
- Joyce UGA (no growth allocation assigned)
- Forks UGA

The rural Clallam County zones have a capacity shortfall of 120 units for the moderate density zone category (50-120 percent AMI). This requires the reallocation of 120 moderate-density units to the existing UGAs. The UGAs have plentiful excess capacity in this zone category, both individually and combined. Therefore, no additional analysis is needed on this topic.

Two UGAs have shortfalls in the high density zone category:

- Sequim UGA – 147 units
- Clallam Bay/Sekiu UGA – 24 units

The Adequate Provisions section of this analysis contains details on how these shortfalls are being addressed in the comprehensive plan periodic update.

## 5 Evaluating capacity for emergency housing needs

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### 5.1 Identify all parcels in zones that allow indoor emergency housing and indoor emergency shelters

Currently, the Clallam County Zoning Code does not list emergency housing or emergency shelters within its use tables. In accordance with CCC 33.05.010, CCC, “[u]nclassified uses may be allowed through the issuance of a conditional use permit.” Theoretically, this would allow for the development of emergency housing within any urban zoning districts. However, it is doubtful that, exclusively, the conditional use permit process would be considered compliant with the requirements of RCW 36.70A.070(2)(c). That said, CCC 33.03.010(73) defines Motel/Hotel as “...a structure which provides overnight, short-term boarding to transient guests and not defined as a bed and breakfast inn facility.”

The definitions for emergency housing and emergency shelters provided earlier are clearly a subset of the use allowed under this definition for Motel/Hotel. And although it is strongly recommended that the Clallam County Zoning Code be amended to incorporate provisions specific to emergency housing and emergency shelters, for the purposes of this capacity analysis and in accordance with the Department of Commerce’s guidance, those zones that permit Motel/Hotel developments will be considered. Since they are dependent on an urban setting, the following zones, which allow Motel/Hotel uses outright, will be considered:

- \*Urban Neighborhood Commercial, UNC (CCC 33.15.070)
- Urban Regional Commercial, URC (CCC 33.15.080)
- \* Urban Center, UC (CCC 33.15.090)
- \* Carlsborg Village Center, CN (Table 33.20.040(A))
- Carlsborg General Commercial, CGC (Table 33.20.040(A))
- \* Carlsborg Commercial, CC (Table 33.20.040(A))

\* Mixed-use zones assume 33% residential, 67% commercial.

Zoning District		Sequim UGA	Carlsborg UGA	Port Angeles UGA	Joyce UGA	Clallam Bay/CQ UGA	Forks UGA	Total
* CN	Available Lots		4.7					4.7
	Available Acres		4.3					4.3
CGC	Available Lots		10					10.0
	Available Acres		<u>11.0</u>					11.0
* CC	Available Lots							0.0
	Available Acres							0.0
* UC	Available Lots				15.4	58.3	16.1	89.8
	Available Acres				<u>50.7</u>	<u>135.1</u>	18.8	204.6
* UNC	Available Lots			60.3			2.0	62.3
	Available Acres			41.8			<u>2.1</u>	43.9
URC	Available Lots			10				10.0
	Available Acres			<u>8.6</u>				<u>8.6</u>
Gross Total	Available Lots	0	14.7	70.3	15.4	58.3	18.1	176.8
	Available Acres	0.0	15.3	50.4	50.7	135.1	20.8	272.4
Total after CA deduction	Available Lots	0	14.2	58.0	11.8	40.6	13.0	137.6
	Available Acres	<u>0.0</u>	<u>14.8</u>	<u>41.6</u>	<u>38.7</u>	<u>94.2</u>	<u>14.9</u>	<u>204.3</u>
<b>Total w/market</b>	<b>Available Lots</b>	<b>0</b>	<b>12.1</b>	<b>49.3</b>	<b>10.0</b>	<b>34.5</b>	<b>11.0</b>	<b>117.0</b>
	<b>Available Acres</b>	<b>0.0</b>	<b>12.6</b>	<b>35.3</b>	<b>32.9</b>	<b>80.1</b>	<b>12.7</b>	<b>173.6</b>
(* Mixed-use Zones Assume 33% residential, 67% Commercial.)								
(CA - Critical Areas)								

Table 19. Available lots and acreage for emergency housing

## 5.2 Narrow the search

The parcel database containing the Clallam County Assessor’s records were queried for vacant parcels within the above-mentioned zones. Mixed-use zones assumed a 33% residential development rate, leaving 67% available for commercial, including the possible development of Motels/Hotels and emergency shelters. As with housing capacity, deductions were calculated for the presence of critical areas and a standard market factor. The results are shown in Table 19, above. (Note that this returns a more limited set of parcels

## 5.3 Adopt any spacing or intensity requirements

As mentioned previously, as Clallam County does not have any development regulations specific to emergency housing/emergency shelter. While some of these regulations (namely definitions and use) are being adopted with the comprehensive plan, the Board of County Commissioners may pass a more comprehensive STEP housing ordinance during 2026.

## 5.4 Assumed Density Method

There are currently no emergency housing projects within unincorporated Clallam County to consider with respect to additional emergency shelter facilities inventory. There are also no standards regarding the placement, spacing, or other controls to consider with respect to citing

such facilities. Although it is strongly recommended that Clallam County consider the adoption of such standards, their absence, for the purposes of this analysis, suggests that such facilities could be placed anywhere within the above-identified acreage.

There is currently only one significant emergency shelter in Clallam County, which is operated by Serenity House of Clallam County. The facility includes 152 available beds over 1.28 acres. This produces a comparable rate of 118.8 beds per acre for evaluating emergency shelter needs. To be clear, other non-governmental entities do operate emergency shelters in Clallam County. They include Healthy Families (18 beds), TAFY (2 beds), Forks Abuse (5 beds) and Sarges Place (8 beds)<sup>4</sup>. However, the number of beds available and their intended purposes make them less than ideal for comparison for this report.

As recommended by Commerce, the data assembled under Table 12 was compared to the HAPT C allocation for emergency housing. The results are shown in Table 20, below:

	Sequim UGA	Carlsborg UGA	Port Angeles UGA	Joyce UGA	Clallam Bay/CQ UGA	Forks UGA	Total
<b>Available acres</b>	0.0	12.6	35.3	32.9	80.1	12.7	<b>173.6</b>
<b>Current Capacity</b>	0	1497	4199	3913	9511	1509	<b>20630</b>
<b>Projected Emergency Housing Need</b>	27	16	27	0	3	3	<b>76</b>
<b>Actual Acreage needed</b>	<u>0.23</u>	<u>0.13</u>	<u>0.23</u>	<u>0.00</u>	<u>0.03</u>	<u>0.03</u>	<b><u>0.64</u></b>
<b>Capacity Surplus (deficit) # of units</b>	<u>-27</u>	<u>1481</u>	<u>4172</u>	<u>3913</u>	<u>9508</u>	<u>1506</u>	<b><u>20554</u></b>

Table 20. Emergency shelter capacity to need for unincorporated Clallam County

## 5.5 Summary

The allocated (projected) emergency shelter “need” (number of beds) is significantly less than the capacity under existing zoning, with the exception of the Sequim UGA. It is recommended that the zoning for the Sequim UGA be amended to incorporate opportunity for emergency shelter development for a minimum of 0.23 acres in order to address the projected need over the 20-year planning horizon. Per Department of Commerce guidance, this analysis should be applied to the zoning changes once completed to demonstrate adequate capacity for future emergency housing needs.

## 6 Adequate Provisions Documentation

RCW 36.70A.070(2)(d) requires jurisdictions planning under the GMA to include in their comprehensive plan a housing element that “[m]akes adequate provisions for existing and projected needs of all economic segments of the community, including:

- (i) Incorporating consideration for low, very low, extremely low, and moderate-income households;
- (ii) Documenting programs and actions needed to achieve housing availability including gaps in local funding, barriers such as development regulations, and other limitations;
- (iii) Consideration of housing locations in relation to employment location; and
- (iv) Consideration of the role of accessory dwelling units in meeting housing needs.”

### 6.1 Housing units needed to manage both current and projected housing needs, broken down by income bracket

Clallam County’s housing allocations are summarized again below. The County must accommodate 1,849 new units worth of capacity across the income brackets as shown here, plus 76 beds of emergency housing/shelter, in the unincorporated areas under its jurisdiction.

Income Level	Percent Area Median Income	Net New Units Needed, 2020-2045
Extremely Low Income	0-30% Permanent Supportive Housing (PSH)	127
	0-30% Other (Non-PSH)	280
Very Low Income	>30-50%	255
Low Income	>50-80%	228
Moderate	>80-100%	80
	>100-120%	62
Above Moderate	>120%	817
<b>Total</b>		<b>1,849</b>
<b>Temporary housing needs</b>		<b>Net new beds needed, 2020-2045</b>
Emergency Housing/Shelter		76

Table 21. Review of Housing Unit Need by Income Level

## 6.2 Documenting programs and actions needed to achieve housing availability

Clallam County is not required to construct housing or ensure that housing is produced. However, the County must identify barriers to housing production and make adequate provisions to accommodate all housing needs.

### 6.2.1 Review housing production trends to determine if barriers exist

Table 22 (below and following page) shows the raw count and 7-year annual average for permits for single-family, multi-family, and ADU housing units.

<b>Zone</b>	<b>Zone Category</b>	<b>SF Units</b>	<b>SF average annual trend</b>	<b>MF Units</b>	<b>MF average annual trend</b>	<b>ADUs</b>	<b>ADUs avg annual trend</b>	<b>Total Units</b>	<b>Total average annual trend</b>
S(R-II) (Sequim)	Moderate Density	27	3.86	1	0.14	7	1.00	35	5.00
S(R-III) (Sequim)	High Density	1	0.14	3	0.43	0	0.00	4	0.57
S(R-IV) (Sequim)	High Density	0	0.00	0	0	0	0.00	0	0.00
CR-I (Carlsborg)	Moderate Density	10	1.43	0	0	0	0.00	10	1.43
CR-II (Carlsborg)	Moderate Density	2	0.29	8	1.14	1	0.14	11	1.57
CR-III (Carlsborg)	High Density	0	0.00	0	0	0	0.00	0	0.00
CC* (Carlsborg)	High Density	1	0.14	0	0	0	0.00	1	0.14
CN* (Carlsborg)	High Density	2	0.29	0	0	0	0.00	2	0.29
VLD	Low Density	5	0.71	0	0	1	0.14	6	0.86
VLD/LD	Low Density	6	0.86	0	0	0	0.00	6	0.86
LD	Moderate Density	15	2.14	0	0	0	0.00	15	2.14
MD	High Density	3	0.43	0	0	0	0.00	3	0.43
URL	Low Density	83	11.86	0	0	0	0	83	11.86
URH	Low Density	33	4.71	2	0.29	1	0.14	36	5.14
UC	Moderate Density	16	2.29	0	0	0	0.00	16	2.29

Zone	Zone Category	SF Units	SF average annual trend	MF Units	MF average annual trend	ADUs	ADUs avg annual trend	Total Units	Total average annual trend
UNC	High Density	0	0.00	0	0	0	0.00	0	0.00
<b>Total Urban</b>	-	204	29.14	14	2	10	1.43	228	32.57
AR	Low Density (Rural and Resource Land)	28	4.00	0	0	1	0.14	29	4.14
CF		6	0.86	0	0	0	0.00	6	0.86
CFM20		5	0.71	0	0	1	0.14	6	0.86
CFM5		6	0.86	0	0	0	0.00	6	0.86
R20		18	2.57	0	0	2	0.29	20	2.86
NC		294	42.00	0	0	50	7.14	344	49.14
R5		212	30.29	0	0	37	5.29	249	35.57
RW5		9	1.29	0	0	0	0.00	9	1.29
R2		17	2.43	0	0	0	0.00	17	2.43
R1		126	18.00	0	0	7	1.00	133	19.00
RW1		0	0.00	0	0	0	0.00	0	0.00
RSC		27	3.86	0	0	1	0.14	28	4.00
RCC5		50	7.14	0	0	4	0.57	54	7.71
RCC3		72	10.29	0	0	7	1.00	79	11.29
RLM		32	4.57	0	0	5	0.71	37	5.29
QR		5	0.71	0	0	0	0.00	5	0.71
RC*		0	0.00	0	0	0	0.00	0	0.00
RV*		0	0.00	0	0	0	0.00	0	0.00
RV2*		0	0.00	0	0	0	0.00	0	0.00
DPA*		1	0.14	0	0	0	0.00	1	0.14
CEN*	0	0.00	0	0	0	0.00	0	0.00	
WRC*	4	0.57	0	0	0	0.00	4	0.57	
RNC	0	0.00	0	0	0	0.00	0	0.00	
TC*	0	0.00	0	0	0	0.00	0	0.00	
<b>Total Rural</b>	-	912	130.29	0	0	115	16.43	1027	146.71

Table 22. Residential Building Permits by Zone in Unincorporated Clallam County

\*Mixed-use zones assume 33% residential, 67% commercial

Tables 23 through 29 (below) shows historical average annual unit production by income category by UGA to indicate whether there is a barrier to sufficient production.

Income level (% AMI)	Projected housing need (2020-2045)	Housing type(s) that best serve these needs	Aggregated housing need (2020-2045)	Annual unit production needed	Historical average annual unit production	Is there a barrier to sufficient production?
0-30% PSH	100	Low-Rise and Mid-Rise (walk-ups up to 3 stories, apartments, condos)	236	9.44	0.57	Yes
0-30% Non-PSH	45					
>30-50%	91					
>50-80%	37	Moderate Density (townhomes, duplex, triplex, 4-plex) + ADUs	60	2.4	5	No
>80-100%	13					
>100-120%	10					
>120%	2	Low Density (single family detached)	2	0.08	0	NO (accommodated in moderate density)

Table 23. Comparison of production trends to housing needs – Sequim UGA

Income level (% AMI)	Projected housing need (2020-2045)	Housing type(s) that best serve these needs	Aggregated housing need (2020-2045)	Annual unit production needed	Historical average annual unit production	Is there a barrier to sufficient production?
0-30% PSH	60	Low-Rise and Mid-Rise (walk-ups up to 3 stories, apartments, condos)	142	5.68	0.43	Yes
0-30% Non-PSH	27					

>30-50%	55					
>50-80%	22	Moderate Density (townhomes, duplex, triplex, 4-plex) + ADUs	36	1.44	3.00	No
>80-100%	8					
>100-120%	6					
>120%	1	Low Density (single family detached)	1	0.04	0	NO (accommodated in moderate density)

Table 24. Comparison of production trends to housing need – Carlsborg UGA

Income level (% AMI)	Projected housing need (2020-2045)	Housing type(s) that best serve these needs	Aggregated housing need (2020-2045)	Annual unit production needed	Historical average annual unit production	Is there a barrier to sufficient production?
0-30% PSH	100	Low-Rise and Mid-Rise (walk-ups up to 3 stories, apartments, condos)	236	9.44	2.71	Yes
0-30% Non-PSH	45					
>30-50%	91					
>50-80%	37	Moderate Density (townhomes, duplex, triplex, 4-plex) + ADUs	60	2.4	2.14	No (close to production needed)
>80-100%	13					
>100-120%	10					
>120%	2	Low Density (single family detached)	2	0.08	1.71	No

Table 25. Comparison of production trends to housing need – Port Angeles UGA

Income level (% AMI)	Projected housing need (2020-2045)	Housing type(s) that best serve these needs	Aggregated housing need (2020-2045)	Annual unit production needed	Historical average annual unit production	Is there a barrier to sufficient production?
0-30% PSH	10	Low-Rise and Mid-Rise (walk-ups up to 3 stories, apartments, condos)	24	0.96	0	Yes
0-30% Non-PSH	5					
>30-50%	9					
>50-80%	4	Moderate Density (townhomes, duplex, triplex, 4-plex) + ADUs	6	0.24	2.29	No
>80-100%	1					
>100-120%	1					
>120%	0	Low Density (single family detached)	0	0	5.14	No

Table 26. Comparison of production trends to housing need – Clallam Bay/Seki

Income level (% AMI)	Projected housing need (2020-2045)	Housing type(s) that best serve these needs	Aggregated housing need (2020-2045)	Annual unit production needed	Historical average annual unit production	Is there a barrier to sufficient production?
0-30% PSH	10	Low-Rise and Mid-Rise (walk-ups up to 3 stories, apartments, condos)	24	0.96	0	Yes
0-30% Non-PSH	5					
>30-50%	9					
>50-80%	4	Moderate Density	6	0.24	2.14	No
>80-100%	1					

>100-120%	1	(townhomes, duplex, triplex, 4-plex) + ADUs				
>120%	0	Low Density (single family detached)	0	0	11.86	No

Table 27. Comparison of production trends to housing need – Forks UGA

### 6.3 Gather information to determine what kind(s) of barriers exist

#### 6.3.1 Low-Rise or Mid-Rise housing barrier review checklist

Barrier	Is this barrier likely to affect housing production?	Why or why not?	Actions being proposed to address barrier
<b>Development regulations</b>			
Unclear development regulations	No	<ul style="list-style-type: none"> <li>Development regulations for zones in the high density zone category are clear</li> </ul>	<ul style="list-style-type: none"> <li>N/A</li> </ul>
High minimum lot sizes	No	<ul style="list-style-type: none"> <li>No high minimum lot sizes in zones in the high density zone category</li> </ul>	<ul style="list-style-type: none"> <li>N/A</li> </ul>
Low maximum densities or low maximum FAR	Yes	<ul style="list-style-type: none"> <li>Max density of 10 du/ac in CN and CR-III zones</li> <li>Max densities in S(R-III) and S(R-IV) are only available with TDR, otherwise only 4 du/ac</li> <li>URH zone allows only 1 du per 12,500 square feet of lot area even though it allows multifamily residential</li> </ul>	<ul style="list-style-type: none"> <li>County is exploring alternatives to TDR program and encoding higher density standards into base zoning (study ongoing as part of this plan update)</li> <li>Since URH is considered to be a zone that allows multiple-family dwellings, the County should</li> </ul>

Barrier	Is this barrier likely to affect housing production?	Why or why not?	Actions being proposed to address barrier
			consider development regulations changes that allow a higher max density in the zone for multifamily dwellings. 1 du/12,500 square feet of lot area is highly unlikely to ever result in multifamily dwellings being constructed in the zone.
Low maximum building heights	No	<ul style="list-style-type: none"> <li>• Most urban zones do not have maximum heights</li> <li>• Sequim UGA zones that do have max heights are reasonable (35 feet for the moderate density zones, 50 feet for the high density zones)</li> <li>• Carlsborg UGA max heights are 36 feet across the board, but these are consistent with max densities (10 du/ac for higher density zones)</li> </ul>	<ul style="list-style-type: none"> <li>• N/A</li> </ul>
Large setback requirements	Yes	<ul style="list-style-type: none"> <li>• Many zones have large setbacks for zones that theoretically allow multifamily housing – depends on type of street frontage but front setbacks start at 45 feet for local access streets</li> </ul>	<ul style="list-style-type: none"> <li>• County should consider reduced front setbacks for zones that theoretically allow multiple-family dwellings</li> </ul>
High off-street parking requirements	No	<ul style="list-style-type: none"> <li>• In Carlsborg and Sequim UGA zoning code standards, duplexes and multifamily housing have a 1.5 space per dwelling unit requirement</li> </ul>	<ul style="list-style-type: none"> <li>• Non-Carlsborg and Sequim urban residential zones do not appear to have off-street parking requirements for non-commercial or industrial uses; if this is intentional this is welcome, if not the County should consider applying the same standards from Carlsborg</li> </ul>

Barrier	Is this barrier likely to affect housing production?	Why or why not?	Actions being proposed to address barrier
			and Sequim county-wide in the urban zones.
High impervious coverage limits	No	<ul style="list-style-type: none"> <li>• Sequim UGA zones have max lot coverages of 50%</li> <li>• LAMIRDs have max impervious coverage of 35%</li> <li>• No max lot coverage or impervious coverage limits in Sequim UGA zones or other urban zones</li> </ul>	<ul style="list-style-type: none"> <li>• N/A</li> </ul>
Lack of alignment between building codes and development codes	No	<ul style="list-style-type: none"> <li>• Not an issue</li> </ul>	<ul style="list-style-type: none"> <li>• N/A</li> </ul>
Other	No	<ul style="list-style-type: none"> <li>• N/A</li> </ul>	<ul style="list-style-type: none"> <li>• N/A</li> </ul>
<b>Process Obstacles</b>			
Conditional use permit process	No	<ul style="list-style-type: none"> <li>• Multifamily residential development is a permitted use in all high density residential zones</li> </ul>	<ul style="list-style-type: none"> <li>• N/A</li> </ul>
Design review	No	<ul style="list-style-type: none"> <li>• There are landscaping and screening standards for mixed use, duplex, and multifamily infill and redevelopment in LAMIRDs. There are also landscaping and lighting requirements for all development except single-family located in chapter 33.53.</li> </ul>	<ul style="list-style-type: none"> <li>• Design standards are clear.</li> </ul>
Lack of clear and accessible information about process and fees	No	<ul style="list-style-type: none"> <li>• County has a consolidated development permit process chapter in code (26.10).</li> <li>• Fee schedules (310-A and 310-B) are cited in CCC 5.100.310 and includes line for multiple family residential</li> </ul>	<ul style="list-style-type: none"> <li>• N/A</li> </ul>

Barrier	Is this barrier likely to affect housing production?	Why or why not?	Actions being proposed to address barrier
Permit fees, impact fees and utility connection fees	Yes	<ul style="list-style-type: none"> <li>Permit fees are reasonable</li> <li>No impact fees, but utility connection fees are through Clallam County PUD and are not clear. Capital facilities charges appear to be substantial for water service based on meter size, but it is not clear</li> </ul>	N/A. Clallam County does not control utility connection fees, as those are set by the PUD.
Process times and staffing challenges	Yes	<ul style="list-style-type: none"> <li>Permit processing is always an issue with a very large jurisdiction and relatively small staff, but this is not overly a problem affecting low- to mid-rise multifamily dwelling units.</li> </ul>	<ul style="list-style-type: none"> <li>No plans to change at this time</li> </ul>
<b>Limited Land Availability and Environmental Constraints</b>			
Lack of large parcels for infill development	No	<ul style="list-style-type: none"> <li>County does not have an absence of parcels with capacity in UGAs, merely a shortage in a couple instances of parcels with zoning sufficient to accommodate housing types that would be affordable to households making under 80% AMI.</li> </ul>	<ul style="list-style-type: none"> <li>Land use changes proposed for existing urban area in Clallam Bay/Seki (changing all URH to MD, which increases capacity from 669 units to 3,124 units) and Sequim (three parcels currently zoned S(R-II) proposed to be rezoned. 14.1 acres to S(R-IV), adding 155 high-density units of capacity, and 17.2 acres to S(R-III), adding 86 high-density units)</li> </ul>
Environmental constraints	Potentially	<ul style="list-style-type: none"> <li>URH zone in Clallam Bay/Seki UGA is subject to vast critical areas restrictions that limit developability</li> </ul>	<ul style="list-style-type: none"> <li>County is proposing re-designation of all area currently zoned URH in Clallam Bay/Seki to MD, increasing capacity on the 208.3 acres of developable land not encumbered by critical areas. This will create plentiful capacity at much</li> </ul>

Barrier	Is this barrier likely to affect housing production?	Why or why not?	Actions being proposed to address barrier
			higher potential densities (and therefore lower income brackets) in a UGA with a shortage of low-rise multifamily capacity.
Gaps in local funding	Yes	<ul style="list-style-type: none"> <li>• Very little local funding for affordable housing</li> </ul>	<ul style="list-style-type: none"> <li>• . None at this time</li> </ul>

Table 28. Low- to Mid-Rise Multifamily housing barrier review checklist

### 6.3.2 Permanent Supportive Housing (PSH) and emergency housing

As noted in the previous section, Clallam County has ample capacity for emergency housing once definitions and permitted uses are clarified in the development regulations in this plan update. However, the permanent supportive housing and emergency housing analysis is as follows.

Barrier	Is this barrier likely to affect housing production?	Why or why not?	Actions being proposed to address barrier
<b>Development regulations</b>			
Spacing requirements (for example, minimum distance from parks, schools or other emergency/PSH housing facilities)	No	<ul style="list-style-type: none"> <li>• County does not have spacing requirements for permanent supportive housing</li> </ul>	<ul style="list-style-type: none"> <li>• County is adding definitions and use permissions for PSH and emergency and transitional housing as part of this plan update. County will explore a more full-featured STEP ordinance after adoption of the plan that may include performance standards.</li> </ul>
Parking requirements	No	<ul style="list-style-type: none"> <li>• County does not have parking requirements specifically for PSH and emergency housing</li> </ul>	<ul style="list-style-type: none"> <li>• County is adding definitions and use permissions for PSH and emergency and transitional housing as part of this plan update. County will explore a more full-featured STEP ordinance after adoption of the plan</li> </ul>

Barrier	Is this barrier likely to affect housing production?	Why or why not?	Actions being proposed to address barrier
			that may include performance standards.
On-site recreation and open space requirements	No	<ul style="list-style-type: none"> <li>County does not have on-site recreation and open space requirements specific to PSH and emergency housing</li> </ul>	<ul style="list-style-type: none"> <li>County is adding definitions and use permissions for PSH and emergency and transitional housing as part of this plan update. County will explore a more full-featured STEP ordinance after adoption of the plan that may include performance standards.</li> </ul>
Restrictions on support spaces, such as office space, within a transitional or PSH building in a residential zone	No	<ul style="list-style-type: none"> <li>There are no standards specific to office support within permanent supportive housing or group housing.</li> </ul>	<ul style="list-style-type: none"> <li>County is adding definitions and use permissions for PSH and emergency and transitional housing as part of this plan update. County will explore a more full-featured STEP ordinance after adoption of the plan that may include performance standards. This will include making sure support spaces are allowed</li> </ul>
Arbitrary limits on number of occupants (in conflict with RCW 35A.21.314)	Yes	<ul style="list-style-type: none"> <li>County has definitions that contain the word “family” but no definition for family. Lack of clarity</li> </ul>	<ul style="list-style-type: none"> <li>County is working on code changes as part of this plan update that include a more expansive definition of household and corrects references in other definitions as appropriate.</li> </ul>
Requirements for PSH or emergency housing that are different than the requirements imposed on housing developments generally (in conflict with	No	<ul style="list-style-type: none"> <li>There are no standards specific to office support within permanent supportive housing or group housing.</li> </ul>	<ul style="list-style-type: none"> <li>County is adding definitions and use permissions for PSH and emergency and transitional housing as part of this plan update. County will explore a more full-featured STEP ordinance after adoption of the plan that may include performance standards. This will include making sure standards are not different</li> </ul>

Barrier	Is this barrier likely to affect housing production?	Why or why not?	Actions being proposed to address barrier
RCW 36.130.020)			than those imposed on housing generally in conflict with RCW 36.130.020.
Other restrictions specific to emergency shelters, emergency housing, transitional housing and permanent supportive housing	No	<ul style="list-style-type: none"> <li>There are no standards specific to office support within permanent supportive housing or group housing</li> </ul>	<ul style="list-style-type: none"> <li>County is adding definitions and use permissions for PSH and emergency and transitional housing as part of this plan update. County will explore a more full-featured STEP ordinance after adoption of the plan that may include performance standards.</li> </ul>
Gaps in local funding	Yes	<ul style="list-style-type: none"> <li>No financial incentive for development of affordable units</li> </ul>	<ul style="list-style-type: none"> <li>No additional funding streams anticipated</li> </ul>

Table 29. PSH and Emergency Housing barrier review checklist

### 6.3.3 Accessory Dwelling Unit (ADU) barrier review checklist

Barrier	Is this barrier likely to affect housing production?	Why or why not?	Actions being proposed to address barrier
<b>Development regulations</b>			
<p>Must allow two ADUs on each lot in urban growth areas;            May not require the owner to occupy the property, and may not prohibit sale as independent units, but may restrict the use of ADUs as short term rentals;            Must allow an ADU of at least 1,000 square feet;            Must set parking requirements based on distance from transit and lot size;            May not charge more than 50% of the impact fees charged for the principal unit;</p>	Yes	<ul style="list-style-type: none"> <li>Various sections of code needed to be revised on account of HB 1337</li> </ul>	<ul style="list-style-type: none"> <li>County is working on code changes that adopt updated ADU requirements in tandem with the periodic update.</li> </ul>

Barrier	Is this barrier likely to affect housing production?	Why or why not?	Actions being proposed to address barrier
<p>Must permit ADUs in structures detached from the principal unit;                      May not restrict roof heights of ADUs to less than 24 feet, unless that limitation applies to the principal unit;                      May not impose setback requirements, yard coverage limits, tree retention mandates, restrictions on entry door locations, aesthetic requirements, or requirements for design review for ADUs that are more restrictive than those for principal units;                      Must allow an ADUs on any lot that meets the minimum lot size required for the principal unit;                      Must allow detached ADUs to be sited at a lot line if the lot line abuts a public alley, unless the city or county routinely plows snow on the public alley;                      Must allow conversions from existing structures, even if they violate current code requirements for setbacks or lot coverage; and                      May not require public street improvements as a condition of permitting ADUs.</p>			
Unclear development regulations	Yes	<ul style="list-style-type: none"> <li>Unclear how “satellite bedroom” applies to ADUs</li> </ul>	<ul style="list-style-type: none"> <li>County is working on code changes that adopt updated ADU requirements in tandem with the periodic update.</li> </ul>
Large setback requirements	No	<ul style="list-style-type: none"> <li>No unduly large setback requirements that are hampering</li> </ul>	N/A

Barrier	Is this barrier likely to affect housing production?	Why or why not?	Actions being proposed to address barrier
		construction of ADUs	
Off-street parking requirements	Yes	<ul style="list-style-type: none"> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• County is working on code changes that adopt updated ADU requirements in tandem with the periodic update.</li> </ul>
Other (for example: burdensome design standards, tree retention regulations, historic preservation requirements, open space requirements, etc.)	No	<ul style="list-style-type: none"> <li>• No other burdensome</li> </ul>	<ul style="list-style-type: none"> <li>• N/A</li> </ul>
<b>Process Obstacles</b>			
Lack of clear and accessible information about process and fees	No	<ul style="list-style-type: none"> <li>• Process for ADU review is outlined on County planning website</li> </ul>	<ul style="list-style-type: none"> <li>• N/A</li> </ul>
Permit fees, impact fees and utility connection fees that are not proportionate to impact	Potentially	<ul style="list-style-type: none"> <li>• ADUs are not specified in fee schedules</li> </ul>	<ul style="list-style-type: none"> <li>• County could consider clarifying ADU permit fees separate from other dwelling unit types</li> </ul>
Processing time and staff challenges	No	<ul style="list-style-type: none"> <li>• Clallam County is a large jurisdiction with a comparatively small staff. However, processing time and staff challenges are</li> </ul>	<ul style="list-style-type: none"> <li>• N/A</li> </ul>

<b>Barrier</b>	<b>Is this barrier likely to affect housing production?</b>	<b>Why or why not?</b>	<b>Actions being proposed to address barrier</b>
		not specific to ADUs	

Table 30. ADU barrier review checklist

## 6.4 Checklist for local option tools for addressing affordable housing funding gaps

<b>Local option tools for addressing affordable housing funding gaps*</b>	<b>Implementation Status</b>	<b>Plans for Implementation</b>
Housing and related services sales tax (RCW 82.14.530)	Already implemented	N/A
Affordable housing property tax levy (RCW 84.52.105)	Not implemented	No plans to implement
REET 2 (RCW 82.46.035) GMA jurisdictions only and only available through 2025	Not implemented	Will no longer be available after 2025
Affordable Housing Sales Tax Credit (RCW 82.14.540) – was only available to jurisdictions through July 2020	Already implemented	No longer available
Lodging Tax (RCW 67.28.150 and RCW 67.28.160) to repay general obligation bonds or revenue bonds	Already implemented	N/A
Mental Illness and Drug Dependency Tax (RCW 82.14.460) – jurisdictions with a population over 30,000	Already implemented	N/A
Donating surplus public lands for affordable housing projects (RCW 39.33.015)	Not implemented	County could consider adopting
Impact fee waivers for affordable housing projects (RCW 82.02.060)	Clallam County does not have impact fees	N/A
Application fee waivers or other benefits for affordable housing projects (RCW 36.70A.540)	Not implemented	County could consider adopting
Multi-Family Tax Exemption (MFTE) with affordable housing requirement (RCW 84.14)	Not implemented	Clallam County does not have a residential college with a sufficient on-campus student

		body, making it ineligible for MFTE at this time.
General funds (including levy lid lifts to increase funds available)	Not implemented	No plans to implement at this time

Table 31. Local tools for addressing affordable housing funding gaps



# References

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Clallam County Code (CCC). (2025) Clallam County Code

Revised Code of Washington (RCW). (2025) Revised Code of Washington (RCW)

Washington State Department of Commerce (2023) "Guidance for Updating Your Housing Element: Updating your housing element to address new requirements."  
<https://deptofcommerce.app.box.com/s/1d9d5l7g509r389f0mjpowh8isjpirlh>