

# Clallam County Comprehensive Plan

## Land Capacity Analysis

May 30, 2025, Amended November 4, 2025

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### Introduction

Clallam County is conducting a periodic update of its Comprehensive Plan in accordance with the Washington State Growth Management Act (GMA). As part of the update review, the County is required to ensure the Plan and subsequent development regulations "...provide sufficient capacity of land suitable for development within their jurisdictions to accommodate their allocated housing and employment growth (RCW 36.70A.115)." This Land Capacity Analysis (LCA) represents an integral step in completing the periodic update by analyzing the current development condition of unincorporated Urban Growth Areas (UGAs) and the rural areas of Clallam County, evaluating the capacity that exists with vacant parcels, under-utilized parcels and parcels with further development potential. A series of assumptions are then applied to this information to account for barriers to future growth that will likely reduce the number of parcels and areas that will experience growth over the next 20-year planning horizon.

In accordance with RCW 36.70A.070(2)(c), the County is required to ensure housing capacity for all income segments. Specifically, the Act requires the County to analyze growth capacity against zoning requirements to ensure adequate room for growth in the following income segments based on Area Median Income (AMI):

- **Extremely low-income:** 0-30% of AMI (includes permanent supportive housing and emergency shelters)
- **Very low-income:** >30-50% of AMI
- **Low-income:** >50-80% of AMI, and
- **Moderate Income:** >80-120% of AMI

This report analyzes parcel data obtained from Clallam County Assessor's records under a GIS format that queries the information based on zoning district and whether the properties exist within an unincorporated UGA or one of the rural or resource zoning districts in unincorporated Clallam County. At the time of this report, the data was shown to include a 7% probability of error factor. Since each incorporated city within Clallam County is also required to perform their own LCA, this report is limited in scope to unincorporated areas of Clallam County.

### Population and Housing Forecast

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/Sekiu, 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, below.

**Table 1: Clallam County 2045 Housing Allocations**

	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	326
Forks UGA	10	5	9	4	1	1	0	3	33
City of Port Angeles	664	299	605	241	85	63	13	173	2143
Port Angeles UGA	100	45	91	37	13	10	2	27	325
City of Sequim	623	280	568	227	80	61	11	164	2014
Sequim UGA	100	45	91	37	13	10	2	27	325
Clallam Bay/Sekiu UGA	10	5	9	4	1	1	0	3	33
Joyce UGA	0	0	0	0	0	0	0	0	0
Carlsborg UGA	60	27	55	22	8	6	1	16	195
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>	<u>1014</u>
<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>

(\* PSH: Permanent Supportive Housing)

With an estimated population of 86,700 people by 2045, Clallam County is expected to grow by 9,545 people since the last Census was completed for Clallam County in 2020, with a total expanded housing need of an additional 6,408 units. In conducting the housing allocation exercise, planning staff from the County and the three cities came to consensus on how the projected growth and related housing needs should be allocated across Clallam County. This discussion included consideration of past growth trends, local conditions and community preferences within each jurisdiction.

As a function of population, the above housing allocations were based on the projected population growth for Clallam County. The 2020 Census data showed a total population

of 77,155 people in Clallam County at that time<sup>1</sup>. Although the population of Clallam County has been projected to include 78,550 people as of June 2024, the above HAPT Method C housing projections were based on the 2020 Census data, making it important to maintain the same projection period of 2020 to 2045. Based on this analysis, the population growth allocation for Clallam County is provided in Table 2, below.

**Table 2: Clallam County 2020 to 2045 Population Growth Allocations**

Jurisdiction	2020 Population (Census)	Percent Growth Allocation	Projected Growth	Projected Growth % of Jurisdiction
City of Forks	3,335	5.0%	477	14.3%
Forks UGA	1,302	0.5%	48	3.7%
City of Port Angeles	19,960	33.0%	3,150	15.8%
Port Angeles UGA	2,781	5.0%	477	17.2%
City of Sequim	8,024	31.0%	2,959	36.9%
Sequim UGA	1,577	5.0%	477	30.3%
Clallam Bay/Sekiu UGA	499	0.5%	48	9.6%
Joyce UGA	89	0.0%	-	0.0%
Carlsborg UGA	918	3.0%	286	31.2%
Unincorporated Rural	38,670	17.0%	<u>1,623</u>	4.2%
<b>Total County Growth by 2045:</b>			<u><u>9,545</u></u>	

It is important to note that these allocations represent consideration of past development trends, but also preferences of the participating cities and the County as to where future growth should occur. In reality, growth will be driven heavily by market factors, availability of infrastructure, economic circumstances, and a host of other factors that will contribute to the rate and form that new development will take. What this information does show are the areas that development is likely to occur, and to form the basis for the remainder of this analysis, which is to evaluate current zoning’s ability to accommodate this projected growth, or whether changes are needed in order to meet future demand.

**Methodology**

The process of determining growth capacity involves establishing a reliable inventory of existing development and ascertaining what remains in terms of vacant parcels,

<sup>1</sup> Population of Cities, Towns and Counties, Office of Financial Management, June 5, 2024

additional capacity within existing parcels, and additional capacity of under-utilized parcels. Clallam County's Information Technology Department (IT) assembled a link between the Clallam County Assessor's parcel database and IT's Geographic Information System (GIS). The information linked the extensive parcel database with the geospatial capabilities of GIS, enabling the query of parcel information by location and zone. This allowed for the development capacity of vacant and underdeveloped parcels to be determined. For example, the Rural Low (R5) zone has a maximum residential density of one home for every 4.8 acres. A vacant R5 parcel possessing 9.6 acres would be shown to have a capacity of two residential units ( $9.6 / 4.8 = 2$ ). Similarly, if that same parcel already contained a home, the capacity would be shown to be one residential unit.

In addition to querying for the right parcels to consider, it was necessary to omit parcels that are not available for development. The assumptions included omitting the following:

- Developed parcels without additional capacity.
- All parcels that exist outside of Clallam County's jurisdiction (e.g. cities, Olympic National Park, etc.).
- All parcels coded as public rights-of-way, common areas, tidelands and water.
- All parcels with public ownership such as parks, public facilities, or other federal, state, county or city ownerships.
- All parcels under 4,000 square feet and within a UGA and all parcels under 12,500 square feet outside of a UGA.

Concerning the latter, it was assumed that a parcel under 4,000 square feet is not feasibly buildable due to setbacks, infrastructure needs and other limiting factors. Similarly, a parcel less than 12,500 square feet in a rural area, where a septic system and well is typically required, is not considered to have sufficient area to accommodate residential development. It should be noted this LCA does not take into consideration all potential prohibiting and/or limiting factors of growth, which can include lack of infrastructure, utilities and access in areas of the City. Such issues will be addressed in appropriate chapters of the Comprehensive Plan.

The data was queried from the joined database and filtered according to the parameters described above. Additional deductions also had to be applied to account for the presence of critical areas. Critical areas include areas of environmental concern, such as wetlands, stream corridors, critical aquifer recharge areas (CARAs), and geologically hazardous areas. While not all critical areas preempt development, landslide hazard areas, water bodies (streams, ponds) and wetlands all include regulations prohibiting development within the critical area or its buffer. Although a range of buffer widths may apply depending on the type of critical area and its ranking, a standard 50-foot buffer was applied for the purpose of this review. This accounts for the fact that an owner may receive approval for buffer averaging, and the fact that the flexible zoning allowed in Clallam County is based on a gross residential density rather than a minimum lot size standard. The assumption is that more development may be accommodated through

these two regulatory features than is otherwise implied by the range of critical area buffers.

Since the GIS parcel layer and critical area layer do not have boundaries that coincide, it was not feasible to join them in a query-able layer. Rather, the acreage of all critical areas along with a standardized 50-foot buffer was obtained for each focus area (each unincorporated UGA and rural Clallam County). The resulting acreage was used as a percentage of the over-all focus area and applied as a reduction.

Another deduction that should be considered is the fact that not everything that can be developed will be developed. Personal preference, general development challenges, economics, and a host of other factors contribute to whether a property will truly see development during the 20-year planning horizon. In accordance with WAC 365-196-310)(4)(d)(F), a market factor that accounts for this variable may be applied to the capacity assessment of potentially developable parcels. The Washington Department of Commerce suggests a market factor of 15% for vacant parcels and 25% for built parcels with development or redevelopment capacity.<sup>2</sup> These percentages have been applied to development within designated UGAs. However, in rural Clallam County, the development challenges are more substantial, including provision of a septic system and private well. With these added costs and complexities, a market factor of 40% has been applied to parcels outside of designated UGAs.

### **Housing Types and Affordability by Income Bracket**

As recommended by the Department of Commerce, demonstrating sufficient development capacity includes: 1) summarizing land capacity by zone, 2) categorizing zones by allowed housing types and density levels, 3) relating zone categories to potential income levels and housing types served, 4) summarizing capacity by zone category, and 5) comparing projected housing needs to capacity. In the event a deficit in development capacity is found to exist, the County is to consider changes to zoning to address the issue, then re-assess capacity based on the actions taken.

The organization of this report will address each item recommended by Commerce, but in an adjusted order for clarity. 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

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<sup>2</sup> Guidance for Updating Your Housing Element, V. 3.4, Washington Department of Commerce, Sept. 2024.

understanding, Table 3 (below) relates zoning categories to available housing types within those categories and the potential affordability range such units may produce.

**Table 3: Relating Zoning and Housing Type to Income Bracket Affordability**

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)

The information contained in Table 3 establishes the general zone categories based on density and the types of housing allowed within similar zoning districts. The types of housing allowed within these broader zone categories are critical to analyzing the County’s ability to accommodate housing needs for all income segments. The table makes clear that accommodating the lower income segments (0-50% AMI) requires at least high-density zones. As discussed earlier, the economies of scale afforded in the high-density category provides the minimum parameters necessary for low-income and supplemental housing to be feasible.

**Data Supporting Affordability Categories.** An analysis of residential permit data for the past 20 years shows that in unincorporated Clallam County, permits were issued for 32 duplexes, 32 units within three-to-four-unit buildings, and 219 units within five-or-more unit buildings. By comparison, permits were issued for 663 single-family homes over that same period.

For the purposes of this analysis, CoStar data for Clallam County was observed. This data is for the county as a whole and does not distinguish between incorporated and unincorporated areas. But given the number and variety of properties in unincorporated UGAs with urban and in some cases multifamily zoning, the data is an appropriate stand-in for unincorporated Clallam County.

The 2025 median rent (year to date) in the CoStar data was \$1,015 per month. This compares with an average monthly rent for \$960 across all apartment types reported in the Washington Center for Real Estate Research (WCRER) apartment market report in Q1 of 2025 and a median gross rent of \$1,094 reported in the 2023 ACS 1-Year Estimates. Therefore, it is likely that the CoStar data is a good representative of the median rent in Clallam County and therefore in unincorporated Clallam County as well.

**Table 4: Affordability by Income Band Summary, HUD Income Limits**

If your household earns...				
\$ 31,200	\$ 45,900	\$ 73,450	\$ 93,900	\$ 112,680
(30% of AMI)	(50% of AMI)	(80% of AMI)	(100% of AMI)	(120% of AMI)
Then you can afford...				
\$ 780	\$ 1,148	\$ 1,836	\$ 2,348	\$ 2,817
(per month rent)	(per month rent)	(per month rent)	(per month rent)	(per month rent)
Or a house worth...				
\$ 136,000	\$ 199,000	\$ 322,000	\$ 410,000	\$ 495,000

Per Table 4, above, the observed rent of \$1,015 per month for attached housing in the CoStar data roughly aligns with the 50% AMI income bracket. Given Clallam County’s inventory of small and larger multifamily units within unincorporated areas, the moderate density zones (5-9 dwelling units per acre that allow duplexes, triplexes, and small-scale multifamily) are appropriate as contributing to meeting need for under-80 percent AMI.

**Accessory Dwelling Units.** It is important to recognize the role that Accessory Dwelling Units (ADUs) play in helping the County meet its housing goals. As noted in Table 3, ADUs provide opportunity for housing within the 50% to 120% 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%** of the volume of new residential units.

Historic development patterns in unincorporated UGAs mostly include larger parcels at lower densities. With the exception of 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% 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 5, below.

**Table 5: ADU Development Capacity and Expected Growth**

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/Seki UGA	30	2
Forks UGA	30	2
Rural County	1014	<u>82</u>
<b>Total Anticipated ADUs:</b>		<b><u>150</u></b>

### Capacity Estimates by UGAs

The following section provides the capacity analysis for each unincorporated UGA within Clallam County as well as rural and resource areas of the County outside of UGAs. The information is presented in two interrelated tables. The first table distills the net available capacity for the zone categories within the focus area. The second table compares the net capacity to the allocated need for the focus area established in the Housing Allocation for Clallam County (Appendix A). This information reveals whether planned growth can be accommodated within existing zoning districts, or if adjustments are required in order to meet future housing needs.

**Sequim Urban Growth Area (UGA).** The Sequim UGA covers approximately 1,153 acres of unincorporated urban area abutting the incorporated boundaries of the City of Sequim. Zoning for the area is predominantly moderate density with some discrete areas (approx. 64 acres) of high-density. Also included are approximately 95 acres of *Sequim Research and Development (S(RDP))*, a zone established for research and development-style industrial campuses and facilities. Net capacity for the residential zone categories present is shown in Table 6-A, below.

**Table 6-A: Net Residential Capacity for Sequim UGA**

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	1,938	607.8
	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	89	30.3
	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>									<u>2,027</u>	<u>638.1</u>

The information in Table 6-A demonstrates a growth capacity of 1,938 additional units within the moderate-density category, and 89 units in the high-density category. Available acreage in these categories include 607.8 and 30.3, respectively, for a total capacity of 2,027 units over 638.1 acres. A comparison of this capacity to the future housing needs by income segment is shown in Table 6-B, below.

**Table 6-B: Housing Capacity Compared to Housing Needs for Sequim UGA**

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

The needs of a lower-density housing segment can be accommodated in a higher-density category. As shown in Table 6-B, a need of two additional units exist within the low-density category. However, all residential zoning within the UGA is either Moderate or high-density. Since all residential zones do allow all residential dwelling types found in the low-density category, those needs can be accommodated in a higher-density category. Unfortunately, the reverse does not apply.

In accordance with guidance provided by the Department of Commerce, this analysis assumes maximum residential densities allowed within the specific zoning districts. However, it must be noted that the S(R-II), S(R-III), and S(R-IV) zones all have a base

density of four units per acre. To achieve the higher densities used in this analysis, Clallam County Code requires acquisition of additional development rights through the Transfer of Development Rights (TDR) program set forth under Chapter 33.26, CCC. The TDR program is intended to allow for the transfer of existing development potential within the Agricultural Retention (AR) Zone to any of the receiving zones located within the Sequim UGA. However, since its inception in July of 1998, not one transfer of development rights has occurred in Clallam County. Unless the TDR Program can be modified to be more economically attractive, it is not working as an effective protection of agricultural lands but is acting to impede development of new housing stock within the UGA.

**Carlsborg Urban Growth Area (UGA).** The Carlsborg UGA includes approximately 559 acres of unincorporated urban area located west of Sequim aligning roughly with Carlsborg Road and SR 101. The UGA does not abut an incorporated city. It relies on Public Utility District #1 of Clallam County (PUD#1) for power and the majority of its water supply, and the City of Sequim, through interlocal agreement, for sewage collection and disposal. Zoning for the area includes a mix of regional and local commercial, a range of moderate and high-density residential, and an industrial park of approximately 81 acres in area. Two of the three commercial zones (CC and CN) allow for high-density residential uses mixed with commercial uses. Net capacity for the zone categories present is shown in Table 7-A, below.

**Table 7-A: Net Residential Capacity for Carlsborg 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			
	Partial use	309	44.8	299	43.3	224	32.5			
CR-III	Vacant	364	38.6	352	37.3	299	31.7	High Density	<b>579</b>	<b>61.6</b>
	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>947</b>	<b>131.5</b>

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

The information in Table 7-A demonstrates a growth capacity of 367 additional units within the moderate-density category, and 579 units in the high-density category. Available acreage in these categories include 69.9 acres for moderate-density and 61.6 acres for high-density. Total capacity is shown to include 947 units over 131.5 acres. A

comparison of this capacity to the future housing needs by income segment is shown in Table 7-B, below.

**Table 7-B: Housing Capacity Compared to Housing Needs for Carlsborg UGA**

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

Again, the needs shown within the low-density category can be accommodated in the moderate-density category. Table 7-B indicates a surplus of housing capacity of 330 units for moderate-density, and 437 units for high-density categories. These suggest that current zoning is adequate to meet the housing needs of all income segments over the 20-year planning horizon.

**Port Angeles Urban Growth Area (UGA).** The Port Angeles UGA covers approximately 2,315 acres of unincorporated urban area abutting the City of Port Angeles. Zoning for the area ranges from low to high-density integrated with neighborhood and regional commercial uses. Also included is approximately 163 acres of *Industrial (M)* zoning, which allows for manufacturing and materials processing. Net residential capacity for the zone categories present is shown in Table 8-A, below.

**Table 8-A: Net Residential Capacity for Port Angeles 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.)

The information in Table 8-A demonstrates a growth capacity of 775 additional units within the low-density category, 1,715 units in the moderate-density category, and 1,520 units in the high-density category. Available acreage in these categories include 475.2, 243.5, and 140.4, respectively, for a total capacity of 4,010 units over 859.1 acres. A comparison of this capacity to the future housing needs by income segment is shown in Table 8-B, below.

**Table 8-B: Housing Capacity Compared to Housing Needs for Port Angeles UGA**

Income Level (% AMI)	Projected Housing Need (HAPT C)	Zone		Aggregated Housing Needs	Total Capacity	Capacity Surplus or Deficit
		Categories Serving Need Level				
0-30% Non PSH	100	High Density		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>

The information in Table 8-B demonstrates that existing capacity within the current zoning districts is adequate to meet the housing needs of all income segments over the 20-year planning horizon.

**Joyce Urban Growth Area (UGA).** The Joyce UGA covers an area of approximately 353 acres of unincorporated urban area located west of Port Angeles along the SR112 corridor. The UGA does not abut an incorporated city. It relies on PUD #1 of Clallam County for power and Crescent Water System for potable water supply. There is currently no public sewer system available and sewage disposal is typically handled through individual on-site septic systems.

Although the Joyce UGA is characterized by historic urban development that existed prior to the passage of the GMA, it has experienced a decline in population in the past decade. This, coupled with limited urban services, renders the UGA limited in its ability and likelihood of seeing significant growth over the 20-year planning horizon.

Zoning for the UGA includes two districts: Urban Center (UC) and Urban Residential High Density (URH). Despite its name, the URH Zone allows only a maximum density of one unit per 12,500 SF (less than 4 units per acre), making it part of the low-density zone category. In contrast, the UC Zone is a mixed-use zone that allows residential densities up to one unit per 7,000 SF, or roughly 6.2 dwellings per acre. As with all mixed-use zoning districts in this analysis, an assumption of 33% development with residential use is used.

In considering the limited urban services and the recent population decline, the UGA was not assigned growth in the allocation process. However, capacity still exists within the UGA. Net capacity for the zone categories present is shown in Table 9, below.

**Table 9: Net Residential Capacity for Joyce 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.)

The growth capacity of the Joyce UGA includes 134 units and 47.1 acres within the low-density category, and 250 units and 44.8 acres within the moderate-density category. Because no housing allocation has been assigned to the UGA, the capacity shown in Table 9 also serves as an indication of surplus housing capacity for the purposes of this analysis.

**Clallam Bay/Sekiu Urban Growth Area (UGA).** The Clallam Bay/Sekiu UGA includes approximately 1,397 acres of unincorporated urban area located along the western

portion of the Straits Regional Planning Area. The UGA does not abut an incorporated city. It relies on PUD #1 of Clallam County for power and the majority of its water supply, and Clallam County Public Works Department for the operation of its municipal sewer system. Zoning for the area includes a mix of regional commercial, a range of moderate and low-density residential, and substantial areas zoned Industrial (M). Net capacity for the zone categories present is shown in Table 10-A, below.

**Table 10-A: Net Residential Capacity for Clallam Bay/Seki 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 10-A shows a growth capacity of 669 additional units across 208.3 acres within the low-density category, and 266 units across 49.3 acres in the moderate-density category. There is no capacity shown within the high-density category. Total capacity is shown to include 935 units over 257.6 acres. A comparison of this capacity to the future housing needs by income segment is shown in Table 10-B, below.

**Table 10-B: Housing Capacity Compared to Housing Needs for CB/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	0	<b>-24</b>
0-30% PSH	5				
>30-50%	9				
>50-80%	4	Moderate Density	6	266	<b>260</b>
>80-100%	1				
>100-120%	1				
>120%	<u>0</u>	Low Density	0	669	<b>669</b>

Table 10-B shows a capacity deficit under the high-density category. At less than 4 units per acre, the URH zone, as the exclusive residential zoning designation for the UGA, does not appear adequate by itself to meet housing demand over the 20-year planning horizon for the high-density category. The capacity for growth in the low and moderate density categories suggests opportunity for reconsidering zoning for the UGA that better aligns with future housing demand.

**Forks Urban Growth Area (UGA).** The Forks UGA covers approximately 2,278 acres of unincorporated urban area abutting the incorporated boundaries of the City of Forks. Zoning for the area is predominantly a mix of low and moderate-moderate density with very limited area (approx. 3 net-acres) allowing high-density residential use. Net capacity for the zone categories present is shown in Table 11-A, below.

**Table 11-A: Net Residential Capacity for Forks 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			
	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.)

The information in Table 11-A demonstrates a growth capacity of 1,603 additional units across 833.0 acres within the low-density category, 1,278 units across 162.7 acres in the moderate-density category, and 49 units within 3.4 acres in the high-density category. A comparison of this capacity to the future housing needs by income segment is shown in Table 11-B, below.

**Table 11-B: Housing Capacity Compared to Housing Needs for 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	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 11-B indicates a surplus of housing capacity of 1,603 units for low-density, 1,272 units for moderate-density, and 25 units for high-density categories. Although this information suggests that current zoning is adequate to meet the housing needs of all income segments over the 20-year planning horizon, consideration may be given to increasing the area of high-density zoning in order to provide more balanced opportunity for housing in all segments.

**Rural Clallam County.** Clallam County covers a land base of approximately 1,739 square miles, or just over 1.1 million acres. However, shared within its borders are large areas of municipal, tribal, state and federal lands that are operated outside of the County’s jurisdiction. A summary of these areas includes:

- Olympic National Park: 313,355 acres
  - Olympic National Forest: 238,145 acres
  - Sovereign Tribal Lands: 34,322 acres
  - State Department of Natural Resources: 154,348 acres
  - State Parks Department: 4,269 acres
  - Incorporated Cities: 16,094 acres
- Total Non-County Area: 760,533 acres**

(Data source: Clallam County GIS System, March 2, 2025)

The removal of these areas reduces the actual area of Clallam County jurisdiction to **352,235 acres**, and **344,180 acres** outside of designated UGAs. Clallam County offers a range of zoning designations across the non-urban, unincorporated areas that are density-appropriate for allowing rural residential development that assures protection of rural character, environmentally sensitive areas and protection of designated resource areas. Also included are areas allowing more intensive development, including higher-density Limited Areas of More Intensive Rural Development (LAMIRDs), and nodal

community and tourist-oriented commercial areas reflective of historic community patterns.

In evaluating the capacity of rural areas, it is important to note that a fundamental goal of the GMA is to encourage new development within cities and UGAs where services necessary for development can be provided in an efficient manner (RCW 36.70A.020). As a result, it is not the intent of this Comprehensive Plan update to address housing accommodations for all affordability segments within rural Clallam County, but the allowance of reasonably scaled development within rural Clallam County is still fundamental to this effort.

Net capacity for the zone categories present in rural Clallam County is shown in Table 12-A, below.

**Table 12-A: Net Residential Capacity for rural Clallam County**

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.)

The information in Table 12-A shows a growth capacity of 6,799 additional units throughout rural Clallam County. This capacity exists within the rural-density category. A

comparison of this capacity to the future housing needs by income segment is shown in Table 12-B, below.

**Table 12-B: Housing Capacity to Housing Need for Rural Clallam County**

Income Level (% AMI)	Projected Housing Need (HAPT C)	Zone		Total Capacity	Capacity Surplus or Deficit
		Categories Serving Need Level	Aggregated Housing Needs		
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

The HAPT Method C model did not allocate any demand for very low and extremely low-income segments for rural areas. It is assumed the needs of these segments will be addressed in urban areas where the high-density zone category is feasible. Table 12-B shows a capacity deficit under the moderate-density category of 120 units. This will require the reallocation of 120 moderate-density units to the existing Urban Growth Areas. Since each UGA has capacity in the moderate-density category to accommodate this allocation, no further analysis is necessary. With this adjustment, the information demonstrates that there exists sufficient capacity within rural Clallam County under existing zoning standards to accommodate allocated housing demand over the 20-year planning horizon.

### Emergency Housing Capacity

In addition to ensuring capacity for housing in all income segments, RCW 36.70A.070(2)(c) specifically requires the County to ensure sufficient capacity of developable land for emergency housing and emergency shelters. This capacity is in addition to the housing capacity analyzed earlier in this report and is intended to provide for community needs presumed to exist as the community works towards meeting its allocated income-segment housing goals. RCW 36.70A.030, defines emergency housing and emergency shelters as follows:

(14) "Emergency housing" means temporary indoor accommodations for individuals or families who are homeless or at imminent risk of becoming homeless that is intended to address the basic health, food, clothing, and personal hygiene needs of individuals or families. Emergency housing may or may not require occupants to enter into a lease or an occupancy agreement.

(15) "Emergency shelter" means a facility that provides a temporary shelter for individuals or families who are currently homeless. Emergency shelter may not require occupants to enter into a lease or an occupancy agreement. Emergency shelter facilities may include day and warming centers that do not provide overnight accommodations.

The analysis for determining adequate capacity for emergency housing and emergency shelters is different from the housing allocations discussed earlier in this report. Instead of measuring capacity in dwelling units, emergency housing/shelters are measured in available beds. Depending on the circumstances, these "beds" can be arranged in discrete, private living quarters, or may be assembled in more general living arrangements. Since "...basic health, food, clothing and personal hygiene" are considered part of emergency housing, consideration must also be given to their provision. In determining the need for emergency housing over the 20-year planning horizon, Clallam County relied on the outputs from the HAPT Method C model, which included allocations for each jurisdiction. This information is summarized later in Table 14.

The Department of Commerce recommends the following sequence (summarized for space) for evaluating capacity for emergency housing and emergency shelters:

- 1) Identify all parcels in zones that allow indoor emergency housing and indoor emergency shelters.
- 2) Within this set, identify vacant parcels, under-utilized parcels, and those with existing motels and hotels.
- 3) Adjust available parcels according to development within the pipeline.
- 4) Apply any adopted spacing or intensity requirements under existing regulations.
- 5) Determine capacity of individual parcels' ability to accommodate emergency housing; or develop an assumed density method based on existing emergency shelters.
- 6) Add the calculated capacity from all available sites.
- 7) Document the available capacity compared to the allocated emergency housing need.<sup>3</sup>

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

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<sup>3</sup> Guidance for Updating Your Housing Element, V. 3.4, Washington Department of Commerce, Sept. 2024.

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 uses 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.

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 13, below:

**Table 13: Available lots and acreage for Emergency Housing**

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)								

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<sup>4</sup> 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), The Answer for Youth (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 13 was compared to the HAPT C allocation for emergency housing. The results are shown in Table 14, below:

**Table 14: Emergency Shelter Capacity to Need for Unincorporated County**

<sup>4</sup> Clallam County Coordinated Entry Annual Report, Serenity House of Clallam County, October 24, 2024.

	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>20,630</b>
<b>Projected Emergency Housing Need</b>	27	16	27	0	3	3	<b>76</b>
<b>Additional 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 or deficit # of units</b>	<b><u>-27</u></b>	<b><u>1481</u></b>	<b><u>4172</u></b>	<b><u>3913</u></b>	<b><u>9508</u></b>	<b><u>1506</u></b>	<b><u>20,554</u></b>

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.

## Employment Forecast and Allocations

The GMA requires Clallam County to determine and allocate projected employment needs for the unincorporated and incorporated portions of the County. This allocation will then be used by the County and individual cities to determine whether there is sufficient capacity to accommodate future employment growth, or whether changes are needed in the jurisdiction’s land use and zoning regulations in order to accommodate expected employment needs in the future.

In Clallam County, employment and economic activity does exist within residentially zoned properties in the form of appropriately scaled home enterprises and home-based industries. And while it is important to the economic health of the County to maintain these flexible economic opportunities, it is generally intended that development of new commercial and industrial uses will occur in appropriately zoned locations.

Therefore, this analysis looks specifically at commercial and industrial-zoned properties. It should also be noted that this analysis is simply for the purpose of evaluating growth capacity, not whether the types of business developments meet family-wage jobs or other economic indicators. Those issues will be considered in greater detail within the text of the Comprehensive Plan.

## Allocations to Cities and County

Clallam County considered data from the Washington State Employment Security Department (ESD) for determining current employment numbers for all of Clallam County. As of December 2024, there were a total of **26,536** employed individuals and a total of **1,737** unemployed individuals for a total labor force of **28,273** within the County. In order to align current employment data with current population, the projected 2024 Population Estimate of **78,550**<sup>5</sup> was used. Combined, the two figures provide a *Population to Employment Ratio (PER)* of:

$$78,550 / 28,273 = 2.78$$

The PER of 2.78 indicates that, to maintain adequate employment capacity, a capacity of one new job for every 2.78 people that move into the County will have to be demonstrated. Projecting this PER over the 20-year Planning Horizon assumes the current demographic mix within the County remains stable. Since the PER is based on 2024 data, the expected population growth has to be adjusted to 2024 figures. Subtracting the difference of the 2020 census total (77,155) and the 2024 projected total (78,550) from the projected 2045 growth estimate (Table 2) means that the expected population growth total from 2024 to 2045 will be:

$$9,545 - 1,395 = 8,150$$

As a function of population growth, the number of new jobs needed over the 20-year planning horizon for each jurisdiction is included in Table 15, below.

**Table 15: Employment Allocations for All Jurisdictions**

Jurisdiction	Percent Growth Allocation	Projected Population Growth	Employment Growth Allocation
City of Forks	5.0%	408	147
Forks UGA	0.5%	41	15
City of Port Angeles	33.0%	2,690	967
Port Angeles UGA	5.0%	408	147
City of Sequim	31.0%	2,527	909
Sequim UGA	5.0%	408	147
Clallam Bay/Sekiu UGA	0.5%	41	15
Joyce UGA	0.0%	-	-
Carlsborg UGA	3.0%	245	88
Unincorporated Rural	17.0%	1,386	498
<b>Totals by 2045:</b>		<u>8,150</u>	<u>2,932</u>

## Employment Capacity Estimate Methodology

<sup>5</sup> Population of Cities, Towns and Counties, Office of Financial Management, June 5, 2024

Establishing capacity for accommodating future employment needs within existing commercial and industrial areas requires a combination of determining existing land availability and what the likely density of employment will be within these areas. Unlike residential zoning, determining underutilized commercial and industrial areas is more difficult as the economic use of land is not necessarily determined solely by building area, and related zoning districts do not require density standards per se. For this reason, only vacant parcels are being considered as future capacity stock. The pivotal assumption is that future business growth will likely occur at densities and character similar to that which currently exists in some of the more established commercial and industrial areas of unincorporated Clallam County—including a commensurate mix of underutilized parcels.

Establishing metrics for the anticipated density of employment likely to occur in future commercial and industrial development also requires examining existing conditions in areas of Clallam County with more established businesses as a measure of what is likely to be experienced throughout the available commercial and industrial land base. To achieve this, three local business areas were analyzed:

**Figure 1: Representative Commercial & Industrial Nodes**



- *The commercial core of the east Port Angeles Urban Growth Area. This area consists of approximately 272.6 acres consisting of 99.8 acres of Urban Regional Commercial (URC) and 177.8 acres or Urban Neighborhood Commercial (UNC) zoning. The area consists of a mix of long-standing commercial activity intermixed with new commercial developments serving both local and regional goods and service needs. The over-all density of businesses makes this area a good proxy for capacity analysis of urban-density commercial areas throughout unincorporated Clallam County.*

- *The commercial node at Highway 101 and O'Brien Rd/Old Olympic Highway.* This area covers approximately 98.5 acres, consisting of 42.8 acres of Rural Limited Commercial (RLC) and 20.1 acres of Rural Neighborhood Commercial (RNC) zoning. The density of business and character of development make this area a good proxy for rural commercial zoning districts throughout unincorporated Clallam County.
- *The Carlsborg Industrial Park.* The Carlsborg Industrial Park covers approximately 86.1 acres of Carlsborg Industrial (CI) zoning. Historically, this area began without the benefit of public sewer, which was later provided in 2017. The moderate degree of development that exists is representative of industrial areas developing where full provision of urban services may be phased in at a later date. For this reason, it is an excellent proxy for industrial lands within unincorporated Clallam County.

The parcel database for each of the three areas was analyzed for commercially developed lots and corresponding lot area. Information regarding the number of employees was obtained from a variety of sources, including permit history, online business data, and simply contacting the owner for inquiry. Where no data was available, the specific parcel and development was not included in the analysis. By totaling the number of employees and total acreage of all parcels considered, an Employees Per Acres (EPA) ratio for each representative area was developed, as follows:

**Table 16: Demonstrated Employees Per Acre (EPA) Ratio**

Focus Area	# of Lots		Total	EPA
	Considered	Lot Acreage	Employees	
East PA UGA Commercial Core	64	127.1	1258	9.9
O'Brien/SR 101 Commercial Node	11	21.27	97	4.6
Carlsborg Industrial Park	22	37.92	301	7.9

The demonstrated EPA was applied to the identified vacant parcels contained in the existing commercial and industrial zoning districts in unincorporated Clallam County. To ensure internal consistency, land determined necessary for future emergency shelter needs as identified in Table 14, above, were removed from consideration. The following is a series of tables that detail the findings of this analysis:

**Table 17: Summary of Employment Capacity under Current Zoning**

Jurisdiction	Zoning	Gross Vacant Lots		Reduction for Critical areas		Reduction for Market Factor		Net Employment Capacity under Current Zoning
		# of Lots	Acres	# of Lots	Acres	# of Lots	Acres	
Sequim UGA	Commercial	0	0	0.0	0	0	0	0
	Industrial	9	32.0	7.9	28.0	6.7	23.8	188
Carlsborg UGA	Commercial *	14.7	16.0	14.2	15.4	12.1	13.1	130
	Industrial	11	26.8	10.6	25.9	9.0	22.0	174
Port Angeles UGA	Commercial *	70.3	50.2	58.0	41.4	49.3	35.2	348
	Industrial	20	57.9	16.5	47.8	14.0	40.6	321
Joyce UGA	Commercial *	15.4	50.7	11.8	38.7	10.0	32.9	326
Clallam Bay/Seki UGA	Commercial *	58.3	135.1	40.6	94.2	34.5	80.0	792
	Industrial	4	272.2	2.8	189.7	2.4	161.3	1274
Forks UGA	Commercial *	18.1	20.8	13.0	14.9	11.0	12.7	126
	Industrial	1	156.9	0.7	112.5	0.6	95.6	755
Rural Clallam County	Commercial *	102.1	447.8	83.5	366.3	50.1	219.8	1011

\* Mixed Use zones are presumed 67% commercial, 33% residential.

Based on the existing employment capacity demonstrated in Table 17 (above) and the employment needs allocation shown in Table 15, earlier, the adequacy of existing zoning to meet the projected employment needs of unincorporated Clallam County is calculated as shown in Table 18, below:

**Table 18: Adequacy of Current Zoning for Future Employment Needs**

	Sequim UGA	Carlsborg UGA	Port Angeles UGA	Joyce UGA	Clallam Bay/Seki UGA	Forks UGA	Rural Clallam County
Current Capacity	188	304	669	326	2066	881	1011
Projected Employment Need	<u>147</u>	<u>88</u>	<u>147</u>	<u>0.0</u>	<u>15</u>	<u>15</u>	<u>498</u>
Capacity Surplus (Deficit)	<u>41</u>	<u>216</u>	<u>522</u>	<u>326</u>	<u>2051</u>	<u>866</u>	<u>513</u>

The information summarized in Table 18, above, demonstrates that sufficient capacity exists in current zoning to accommodate the projected, allocation employment growth that is expected in unincorporated Clallam County over the 20-year planning horizon.

## Findings and Recommendations

The information contained in this analysis produced key findings and recommendations for future decision-making concerning the 2025 periodic update of the Clallam County Comprehensive Plan, including the following:

1. Per Commerce guidance, data showed nominal shortfall in fully accommodating very low and extremely low-income segments in the Sequim and Clallam Bay/SekiU UGAs. Specifically, the unincorporated Sequim UGA shows a need for an additional 147 units in the *High-Density* category, and the Clallam Bay/SekiU UGA shows a need for an additional 24 units also in the *High-Density* category. Changes are needed to current zoning in order to correct these deficiencies.
2. A reallocation of approximately 120 units in the *Moderate-Density* category is needed from rural County to unincorporated UGAs. Sufficient capacity exists in all UGAs to accommodate this need. All other areas of unincorporated Clallam County are shown to have sufficient capacity under existing zoning to accommodate growth over the 20-year planning horizon.
3. The lack of successful implementation of the Transfer of Development Rights (TDR) program as set forth under CCC 33.26, is proving to be a barrier to achieving housing and agricultural preservation objectives. Without an economically attractive program design, the requirement is merely proving to be a barrier to higher-density residential growth in the unincorporated Sequim UGA. Consideration should be given to adjusting the program to improve its attractiveness, or its removal as a requirement.
4. The analysis shows a lack of opportunity for the development of emergency shelters and emergency housing within 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, a new analysis should be applied to any subsequent zoning changes, once completed, to demonstrate adequate capacity for future emergency housing needs.
5. The Clallam County Zoning Code should be amended to incorporate provisions specific to emergency housing and emergency shelters. Standards should be considered regarding the placement, spacing, or other operational and nuisance controls for the appropriate siting of such facilities.
6. Per Commerce guidance, the analysis concerning employment allocation shows that existing zoning is adequate to accommodate projected and allocated employment needs based on the capacity of lands within existing commercial and industrial zoning categories according to demonstrated employee per acre (EPA) assumptions.
7. This analysis considered only the minimum conditions required to accommodate projected and allocated housing and employment needs according to Commerce guidelines and the requirements of the GMA (RCW 36.70A). Arriving at final

recommendations for meeting future housing demand and employment growth will require further analysis and considerations under the Housing and Economic Development Elements of the Comprehensive Plan.

## **List of Appendices**

- A. Clallam County Resolution 101, November 26, 2024**
- B. Housing for All Planning Tool (HAPT), Method C, August 28, 2024**
- C. Accessory Dwelling Unit (ADU) Data, March 4, 2025**
- D. Zoning Districts and Densities, May 19, 2025**
- E. Parcel Data for Commercial Nodes, May 20, 2025**
- F. Employment Capacity EPA, May 30, 2025**