AGENDA
PLANNING COMMISSION
January 8, 2026

Hybrid Meeting In-person and via Zoom

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Meeting ID: 853 3399 9074
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CITY OF ELLENSBURG
PLANNING COMMISSION AGENDA
Council Chambers
501 North Anderson Street
Ellensburg, WA 98926
And remotely via Zoom
Thursday, January 8, 2026
5:45 PM - Regular Meeting

1. **Call to Order and Roll Call of Members**
2. **Approval of Agenda** (No Public Comment)
3. **Approval of Minutes**
   - 3.A Planning Commission November 13, 2025 regular meeting minutes
4. **New Business**
   - 4.A 2026 election of Planning Commission chair and vice chair
   - 4.B Review and discussion on Comprehensive Plan Periodic Update: Land capacity analysis and proposed zoning changes overview with Andrew Oliver of Leland Consulting.
5. **Unfinished Business**
6. **Public Comment**
7. **Staff Update/Discussion Items**
   - 7.A Staff Updates: Council Action on 2025 Code Update and 2025 Annual Code Amendments
8. **Commission Representative Update**
9. **Adjournment**

For more information on the Ellensburg Planning Commission, contact Planning Manager, Stacey Henderson, at 509-962-7232.
The Contents of this agenda have been photocopied on recycled paper.

Meeting Date: January 8, 2026
City of Ellensburg
Planning Commission Agenda Report

Agenda Subject: Planning Commission November 13, 2025 regular meeting minutes

Submitted by:

Department: Community Development

Suggested Motion/Action:
Move to approve November 13, 2025 Planning Commission regular meeting minutes.

Background/Summary:

Previous Council Action:

Analysis:

Financial Impact:

Budget Adjustment: No

Attachments:
1. 11.13.25 PC regular meeting minutes

CITY OF ELLENSBURG **Minutes of Planning Commission, Regular Meeting**

Date of Meeting **November 13, 2025**

Time of Meeting **5:45 PM**

Place of Meeting **Council Chambers**
501 North Anderson Street
Ellensburg, WA 98926
And remotely via Zoom

1. Call to Order and Roll Call of Members

Commissioner Harrell called the meeting to order at 5:45 p.m.

Present: Michael Buehn, Ed Harrell, Geraldine O'Mahony, George Bottcher, Sathy Rajendaran, Skylar Bisom-Rapp, Joe Sheeran
Absent:
Others Present: Stacey Henderson, Planning Manager; Dan Carlson, Community Development Director; Heidi Behrends Cerniwey; Derek Mayo, City Engineer; Chris Horner, City Attorney; David Miller, City Council Liaison; Kathy Boots, Planning Technician; Nancy Goodloe; and several members of the public.

2. Approval of Agenda

Commissioner Bisom-Rapp motioned to approve the agenda. Motion passed 7-0.

3. Approval of Minutes

3.A Review of October 23, 2025 Study Session Minutes
Commissioner Sheeran motioned to approve the October 23, 2025, regular meeting minutes. Motion passed 7-0.

4. New Business

4.A Public Hearing (Legislative) to Consider 2025 Annual Comprehensive Plan Amendments.
The public hearing to consider the 2025 Annual Comprehensive Plan Amendments was opened. Henderson summarized her staff report for amendments 25-01 and 25-02. Comprehensive Plan Amendment 25-01, the Capital Improvement Plans, with exhibits, were reviewed and staff recommended approval. Comprehensive Plan Amendment 25-02.001-.308 to Revise Chapter 9 of the Comprehensive Plan with exhibits was reviewed. The City Council recommended revising Chapter 9 as it currently reads to avoid legal exposure and to rewrite the entire chapter, policies, and goals in 2026 in conjunction with the DEI Commission. The meeting was opened to testimony.

Public testimony was heard about Chapter 9 by Cari Vickers, Beryl Kelley, Rosy Hall, Candice Comfort, Amber Hoefer, Jennifer Patteson, Phil Backlund,

and Christopher Hobbs.

Staff had nothing to add. Commission members asked staff questions. The options for the motion were reiterated. The public hearing was closed.

Commissioner Bisom-Rapp motioned to approve the revised chapter with changes that include not striking anything, and rather adding language to Chapter 9 that explicitly deals with compliance with executive order 14151, executive order 14173, the Attorney General's memos from March 21 and July 29, and as referenced in the document titles 6 & 7 of the Civil Rights Act of 1964. The Commission deliberated. The motion failed 2-5 (Joe Sheeran, Michael Buehn, Sathy Rajendran, Ed Harrell, Geraldine O'Mahony voting against the motion).

Commissioner Buehn motioned to recommend approval of the Comprehensive Plan Amendment 25-01 to the City Council for approval. Motion passed 7-0.

Commissioners clarified with the Director that review of Chapter 9 of the current Comprehensive Plan would be rewritten in 2026 and some members would like to include a recommendation from the Planning Commission that the City Council include some guidance that staff start with the existing Chapter 9 in that discussion. The existing Chapter 9 would not be enforced in the interim. The amended Chapter 9 would be in effect until Chapter 9 is rewritten in 2026.

Commissioner O'Mahony motioned to disapprove the rewrite of Chapter 9. Motion failed 3-4 (Joe Sheeran, Michael Buehn, Sathy Rajendran, Ed Harrell voting against the motion).

Commissioner Sheeran motioned to approve the revised Chapter 9, as written by City staff. Commissioner Bisom-Rapp motioned to amend the motion that Planning Commission approves the changes as written with explicit guidance to council that they be clarified with their acceptance of them that this is for the purpose of legal compliance, in the short term while our Comprehensive plan update process carries out through 2026. The acceptance of these edits does not in the affirmative or negative, bias whether the language of Chapter 9 as it stands is or is not appropriate. Discussion ensued. Amended motion passed 4-3 (Geraldine O'Mahony, Joe Sheeran, and George Bottcher voted against the amendment). The original motion with amendment passed 5-2 (Geraldine O'Mahony and George Bottcher voted against the motion).

5. Unfinished Business
None.

6. Public Comment
None.

7. Staff Update/Discussion Items
The December meeting was cancelled.

Individual Commission members can go to the City Council and speak for themselves.

8. Commission Representative Update
No update.

9. Adjournment
The meeting was adjourned at 7:23 p.m.

Ellensburg Comprehensive Plan

LAND CAPACITY ANALYSIS FOR HOUSING, EMPLOYMENT, AND HOUSING BY INCOME BAND | DRAFT 2025-12-22

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LELAND CONSULTING GROUP

Introduction and Targets

Leland Consulting Group (Leland) was retained by the City of Ellensburg as part of a team led by the SCJ Alliance (SCJ) to assist in completing several required analyses for its 2026 Comprehensive Plan update. As part of this work, Leland conducted a Land Capacity Analysis (LCA) to determine potential development capacity for housing and jobs in the city through 2046, including capacity for housing units by income band to comply with recent updates to the Growth Management Act (GMA). This report details the methodology and results of this analysis, which was conducted using the Kittitas County LCA Methodology (May 8, 2025), developed to ensure consistency across the County for the current Comprehensive Plan update cycle. This report follows the order of analysis steps in the County methodology, which is attached as Appendix A.

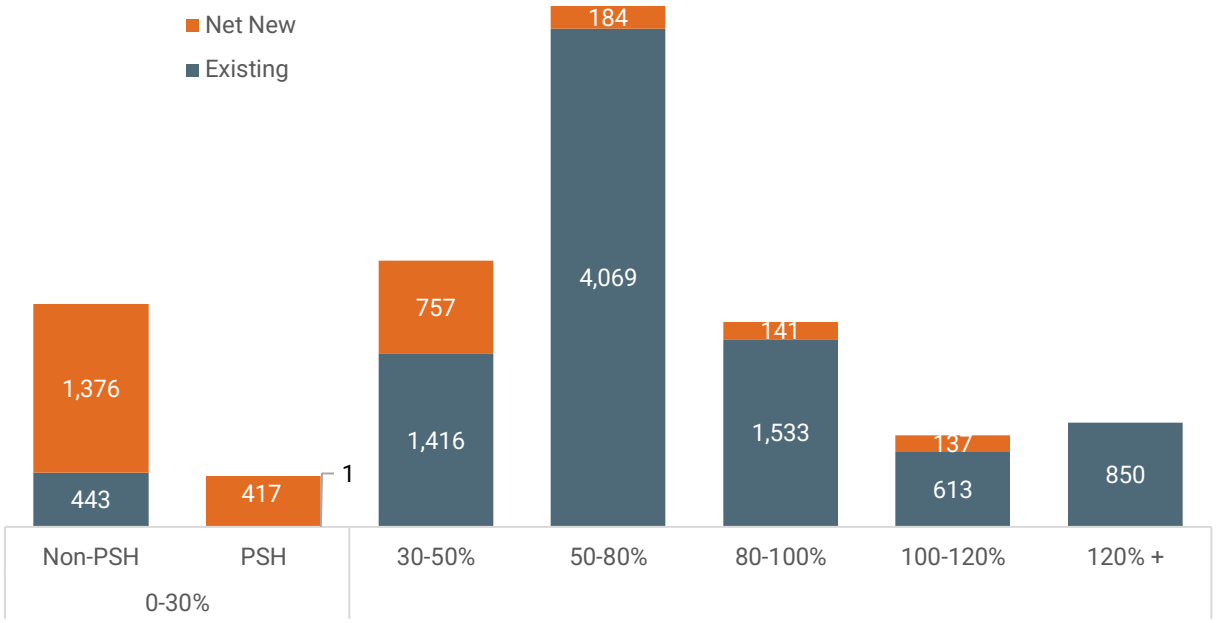
Note that, per the County methodology, the base point in time for this LCA is December 31, 2024, and that this LCA only analyzes incorporated parcels inside the City of Ellensburg. Kittitas County will analyze unincorporated parcels within the Ellensburg Urban Growth Area (UGA).

In accordance with the GMA, all Kittitas County jurisdictions are required to demonstrate that they have sufficient land capacity to accommodate the projected 2046 housing needs and jobs growth based on Washington Office of Financial Management (OFM) countywide forecasts. Kittitas County established population, housing, and employment growth targets for all cities within the County using the OFM forecasts and the Department of Commerce's Housing for All Planning Tool (HAPT) for this planning horizon, using a 2020 baseline. Ellensburg's must plan for a total of **25,631 residents by 2046, an increase of 4,834** from the 2020 baseline of 20,797. Using the HAPT, which takes into account household size, future vacancy rates needed to ensure a healthy housing market, and housing needed to accommodate homeless and cost-burdened residents, this translates to a housing target of **3,012 net new units between 2020 and 2046**. The county also established a jobs target based on the existing jobs-to-housing ratio of 0.90. This results in a target of **2,710 net new jobs** for the 2020-2026 period.

The housing unit targets are further broken down by what household income level they can serve. The chart below in Figure 1 shows Ellensburg's existing housing units (in blue) and projected net new housing units (in orange) needed for the 2020-2046 planning horizon and grouped by income band, expressed as a percentage of Kittitas County Area Median Income (AMI). The 2024 AMI for Kittitas County used in this analysis was **$99,800**. The AMI is determined by the U.S. Department of Housing and Urban Development (HUD) and is generally higher than the U.S. Census-reported median household income for a given city since it is a countywide metric and based on average family income, which excludes one-person households. The HUD AMI is used to determine eligibility and income limits for subsidized affordable housing units.

Note that the projected housing needs for families earning under 30% AMI are broken down into permanent units (i.e. standard housing units) and permanent supportive housing (PSH), defined in the Department of Commerce guidebook as "subsidized, leased housing for people who are experiencing homelessness or are at risk of homelessness and living with a disabling condition."

Figure 1. Ellensburg Existing (2020) and New Housing Units Needed by Income Band, 2020-2046



Source: Kittitas County, Washington Department of Commerce

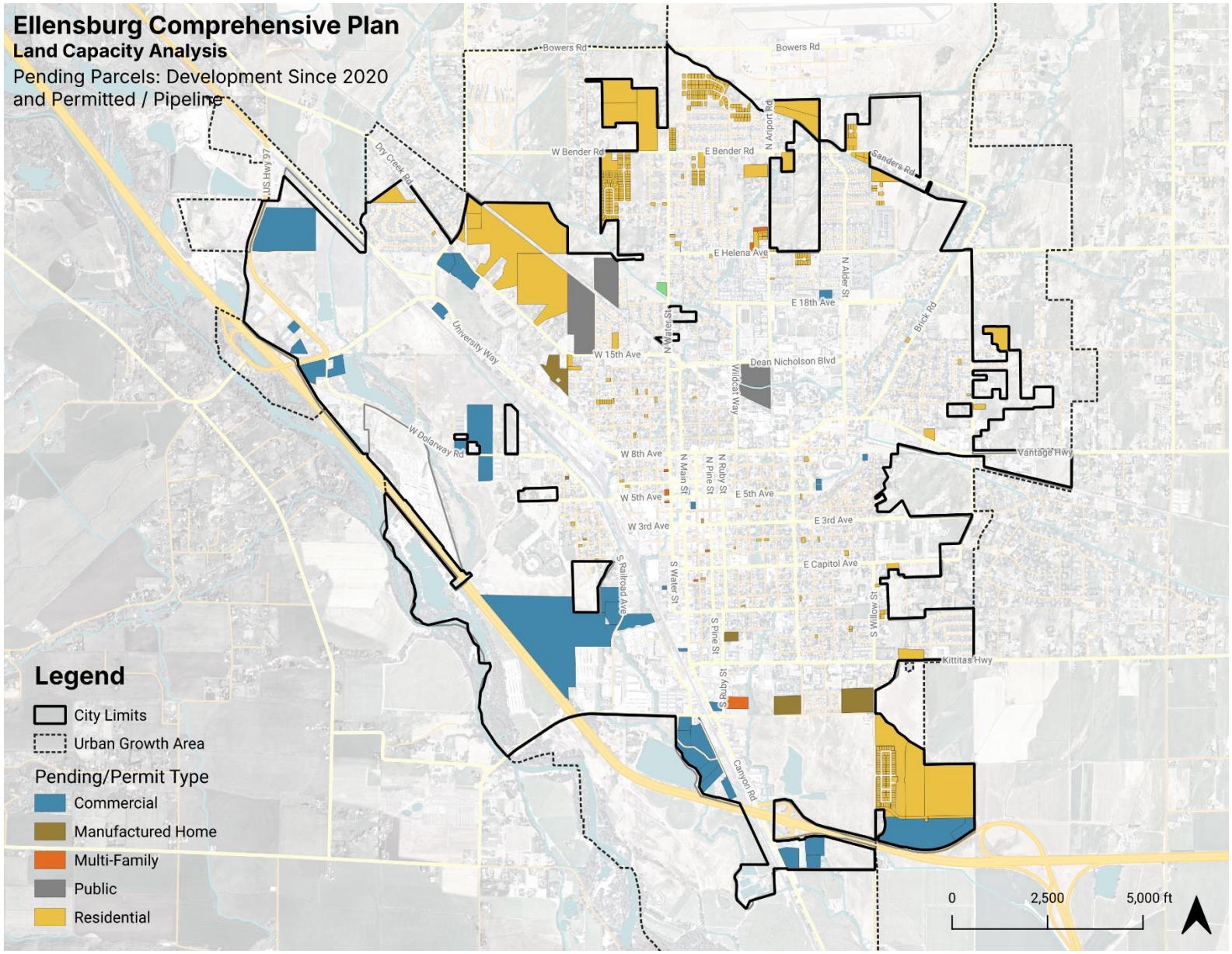
Data Collection and Calculating Gross Developable Land Inventory

The first step in the analysis involves refining the city's parcel layer to calculate the total amount of developable land with capacity for development over the 20 year horizon. Kittitas County Assessor parcel data was collected from the County's GIS hub and used to conduct this analysis.

Pending Development

Per the County's methodology, parcels with pipeline development should be removed so as not to double-count parcels in the LCA process. Additionally, as discussed above, the state sets the baseline for the housing and jobs targets at 2020. Therefore, any development which has occurred since 2020 is also counted towards meeting the city's target. Together, **development since 2020 and planned/pipeline development is called "Pending" development** for the purposes of this LCA. The map below in Figure 2 shows parcels with pending development, and the chart below in Figure 3 shows details of pending development by zone and development type. As noted in the County methodology, these parcels were removed from consideration in the LCA and will be added back into the totals at the end of the analysis.

Figure 2. Pending Parcels in Ellensburg for LCA



Source: City of Ellensburg, Kittitas County Assessor, Leland Consulting Group

Figure 3. Pending Development in Ellensburg by Zone, 2020-2046

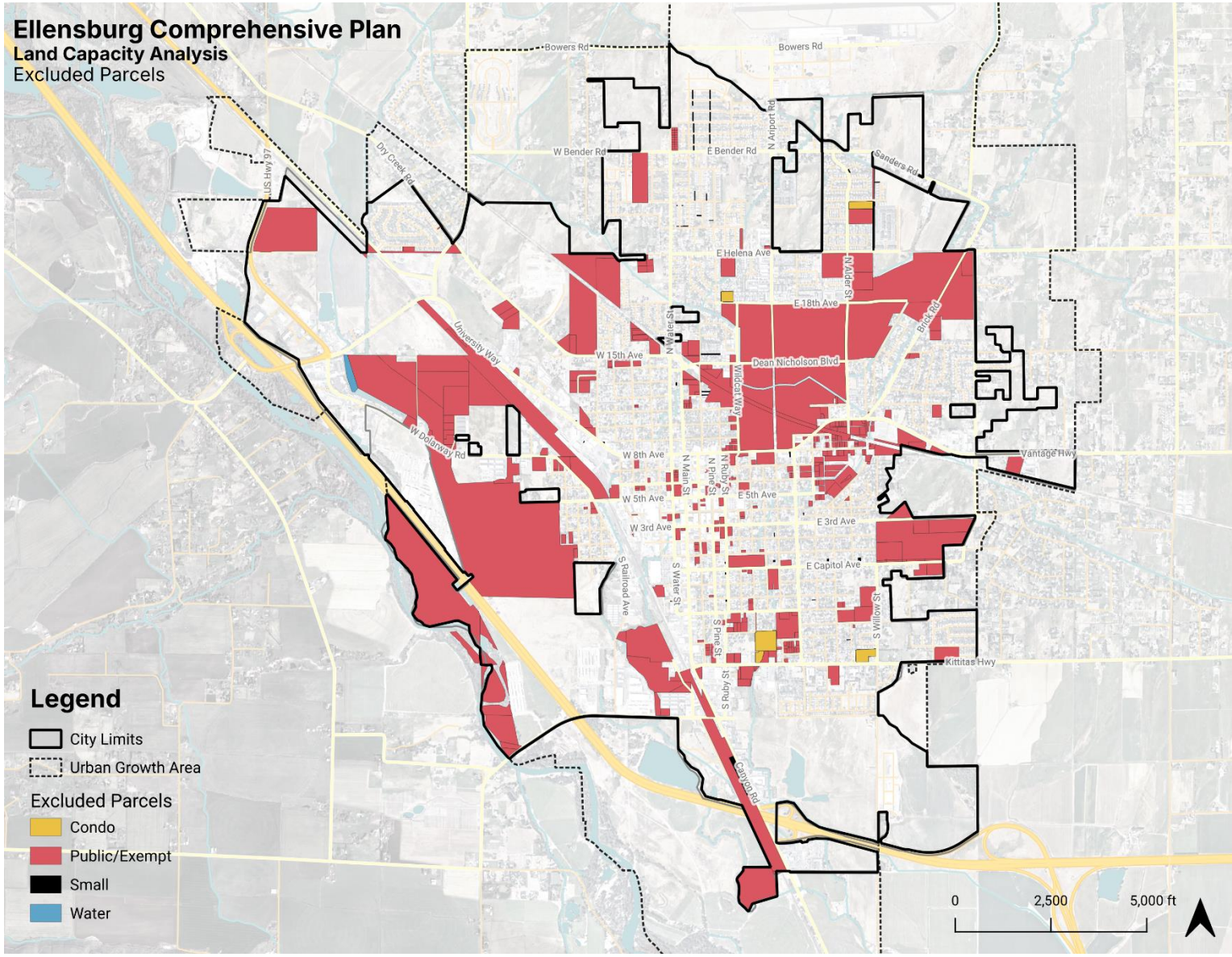
	HOUSING				EMPLOYMENT	
Zone	Single-Family or Middle Housing Units	Manufactured Home Units	Multi-Family Units	Total Units	Total Commercial Square Feet	Estimated Total Jobs
CC	2		100	102	721	2
CC II				0	1,248	3
CH	2			2	25,410	63
CN						0
IH						0
IL		1		1	900,371	1,125
MHP		9		9		
NCMU			78	78		
PR					15,806	40
PUD						
RCMU						
RH	9		20	29		
RL	30			30	2,584	7
RM	36		33	69	600	2
RO	6			6		
RS	1,100			1,100	2,800	7
Grand Total	**1,187**	**10**	**231**	**1,426**	**949,540**	**1,249**

Source: City of Ellensburg, Kittitas County Assessor, Leland Consulting Group

Excluded Parcels and Undevelopable Land

In addition to the pending parcels, the County methodology removes **publicly owned and tax-exempt parcels** from consideration in the LCA, as well as allowing jurisdictions flexibility in choosing other parcels to remove from consideration. For this analysis, condominiums were also removed, since they typically are unlikely to redevelop and the particulars of assessor data can cause them to be flagged as redevelopable using the methodology detailed below. In addition, very small fragments of parcels that are too small for any significant redevelopment, as well as easements, fragments of right-of-way, and parcels entirely made up of water were removed from consideration in this LCA. The map below shows excluded parcels by type. These parcels total **1,369 acres**.

Figure 4. Parcels Excluded from Consideration in Ellensburg LCA



Source: City of Ellensburg, Kittitas County Assessor, Leland Consulting Group

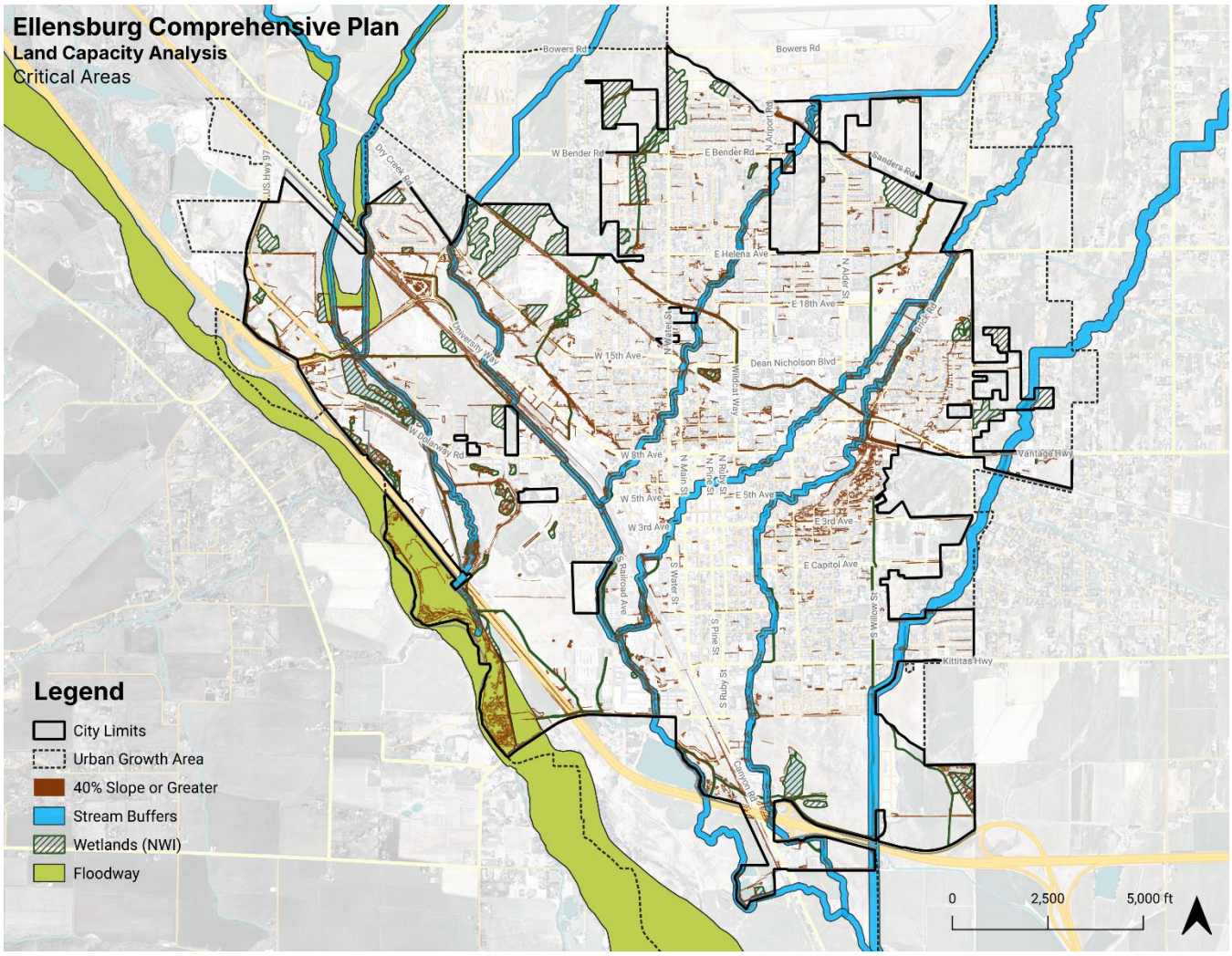
Critical Areas

The County methodology lists the following critical areas which create undevelopable conditions on properties. Data sources used for this analysis are also listed below:

- **Steep slopes** (Washington State LIDAR data – 40% slope and greater used for this analysis)
- **Streams** (City data)
- **Wetlands** (National Wetland Inventory)
- **Floodways** (FEMA maps)
- **Critical Area Buffers** (City code – 85 feet used for streams and 50 feet for Lyle Creek)

These critical areas were mapped, and the acreage was removed from the total developable acreage at the parcel level. The map below shows the critical areas by type used in this LCA:

Figure 5. Critical Areas Removed from Ellensburg LCA



Source: City of Ellensburg, Federal Emergency Management Administration, State of Washington, U.S. Fish and Wildlife Service

The table below shows the gross acres and gross developable acres by zone, after removing excluded parcels and critical area acreage:

Figure 6. Gross Developable Acres by Zone in Ellensburg for LCA

Zone	Gross Zone Area (acres)	Gross Developable Land (acres)
CC	51.0	44.0
CC II	59.2	41.5
CH	430.4	323.8
CN	9.3	4.5
IH	62.2	22.4
IL	289.5	162.2
MHP	33.4	32.3
NCMU	17.9	13.1
PR	2.3	1.5
PUD	19.9	18.6
RCMU	96.0	65.0
RH	9.6	8.0
RL	354.6	301.3
RM	250.9	208.9
RO	50.6	44.8
RS	974.0	792.3
Grand Total	**2,710.8**	**2,084.3**

Parcel Classification

To determine developable land capacity in Ellensburg, a set of assumptions was used to categorize the parcel acreage shown above as **vacant**, **partially used**, **under-utilized**, or **fully developed**, according to the County methodology.

Vacant

Parcels in all zones were identified as "vacant" if one of the following was true:

- Parcels classified as **undeveloped** or **vacant** by the Kittitas County Assessor
- Parcels with a combined improvement (building) and land value of **$10,000** or less.

Partially Used

The partially-used classification refers to parcels in single-family zones that are **large enough to be subdivided** for additional units. The threshold set by the County are parcels that are three times larger than the allowed minimum lot size. In Ellensburg, the RS and RL zones were used for this classification methodology. In addition, parcels with an improvement (building) value worth more than the 75th percentile of the assessed building value citywide were removed, to represent high-value homes on large properties that are unlikely to subdivide.

Under-Utilized

This category applies to parcels in all other zones aside from RS and RL. For this analysis, parcels are considered under-utilized if the ratio of the improvement (building) to land is less than **1.0**, indicating that the parcel **can redevelop to a more intense use** than is currently on the parcel. Additionally, single-family homes in zones allowing denser middle housing or multifamily housing are also classified as under-utilized.

Fully Developed

Parcels which were not excluded earlier in the process (i.e. pending, public, otherwise undevelopable), and which do not meet any of the criteria for vacant, partially used, or under-utilized, are classified as "**fully developed**" and are not assumed to have any development capacity for the purposes of this LCA.

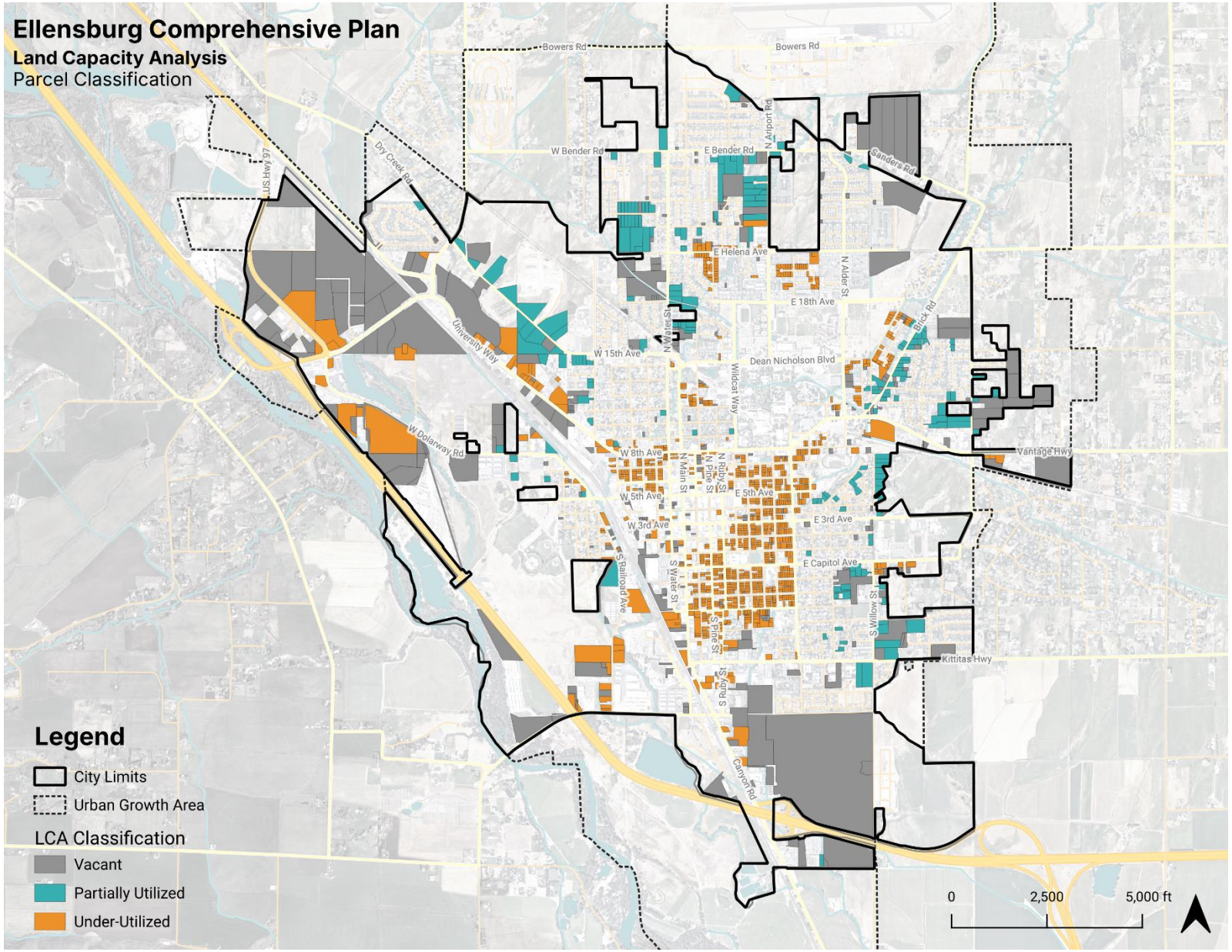
LCA Parcel Summary

The table below shows the vacant, partially-used, and redevelopable acreage in each zone after the critical area acreage was removed. The locations of these parcels are shown on the map below in Figure 8.

Figure 7. Total Gross Unconstrained Acreage of Vacant, Partially Used, and Under-Utilized Parcels by Zone

Zone	Description	Vacant	Partially Used	Under-Utilized	Total
RS	Residential Suburban	310.6	66.4	0.0	377.0
RL	Residential Low Density	15.5	22.8	0.0	38.4
RM	Residential Medium Density	25.9	0.0	89.6	115.4
RH	Residential High Density	1.9	0.0	1.9	3.8
RO	Residential Office	3.6	0.0	32.4	36.0
CH	Commercial Highway	172.9	0.0	53.9	226.8
CC	Central Commercial	3.7	0.0	7.9	11.6
CC II	Central Commercial II	8.2	0.0	12.3	20.4
MHP	Manufactured Home Park	3.7	0.0	1.9	5.6
IL	Industrial Light	71.9	0.0	45.6	117.4
IH	Industrial Heavy	3.9	0.0	7.9	11.8
PR	Public Reserve	0.5	0.0	1.0	1.5
RCMU	Regional Center Mixed Use	53.2	0.0	11.8	65.0
NCMU	Neighborhood Center Mixed Use	9.0	0.0	1.8	10.9
	Total	**684.6**	**89.2**	**267.9**	**1,041.7**

Figure 8. Land Capacity Analysis Parcel Classification Map



Deductions and Market Factors

The Kittitas County LCA Methodology indicates that jurisdictions should reduce the amount of vacant and redevelopable acreage by a reasonable amount to account for land that may not be available for redevelopment due to the market conditions or property owner decisions and preferences, as well as a deduction for land that may be needed for new infrastructure improvements such as right-of-way, landscaping, open space, stormwater management, etc. The County's methodology contains a market factor deduction of **10 percent for vacant parcels** and **25 percent for partially used and under-utilized parcels**, which were used in this analysis. The County also suggests an infrastructure deduction of 5-10 percent for cities. Ellensburg staff selected an **infrastructure deduction of 5 percent** given the overall availability of infrastructure in the city. The table below shows the total net developable acres by zone after applying these deductions.

Figure 9. Deductions and Net Acreage by Zone (after Deductions) for Ellensburg Land Capacity Analysis

	Vacant		Partially Utilized		Under-Utilized		
Zone	Total Reduction Factor	Net Acres	Total Reduction Factor	Net Acres	Total Reduction Factor	Net Acres	Total Net Acres
RS	15%	264.0	30%	46.5	30%	0.0	**310.5**
RL	15%	13.2	30%	16.0	30%	0.0	**29.2**
RM	15%	22.0	30%	0.0	30%	62.7	**84.7**
RH	15%	1.7	30%	0.0	30%	1.3	**3.0**
RO	15%	3.1	30%	0.0	30%	22.7	**25.7**
CH	15%	147.0	30%	0.0	30%	37.7	**184.7**
CC	15%	3.2	25%	0.0	25%	5.9	**9.1**
CC II	15%	6.9	25%	0.0	25%	9.2	**16.1**
MHP	15%	3.2	30%	0.0	30%	1.4	**4.5**
IL	15%	61.1	30%	0.0	30%	31.9	**93.0**
IH	15%	3.3	30%	0.0	30%	5.5	**8.8**
PR	15%	0.4	30%	0.0	30%	0.7	**1.1**
RCMU	15%	45.2	30%	0.0	30%	8.3	**53.5**
NCMU	15%	7.7	30%	0.0	30%	1.3	**9.0**
		581.9		**62.5**		**188.5**	**832.9**

Housing and Employment Capacity

Residential/Commercial Split

Having established the amount of available developable acreage, the next step in the analysis is to determine the **share of this acreage which may redevelop as residential and nonresidential uses** in each zone. The County methodology suggests a baseline assumption of a 50/50 residential/commercial split in mixed-use zones. This was used in the CC, CCII, and NCMU zones in Ellensburg. In the RCMU zone, staff adjusted the percentage to 30 percent residential and 70 percent commercial, following recent development trends in the zone and expectations that there will continue to be a higher share of commercial compared with residential developed in the RCMU over the planning horizon. The table below shows the assumed residential share of each zone used in this analysis.

Figure 10. Assumed Residential/Commercial Share for Ellensburg LCA

Zone	Description	Assumed % Residential
RS	Residential Suburban	100%
RL	Residential Low Density	100%
RM	Residential Medium Density	100%
RH	Residential High Density	100%
RO	Residential Office	100%
CH	Commercial Highway	0%
CC	Central Commercial	50%
CC II	Central Commercial II	50%
MHP	Manufactured Home Park	100%
IL	Industrial Light	0%
IH	Industrial Heavy	0%
RCMU	Regional Center Mixed Use	30%
NCMU	Neighborhood Center Mixed Use	50%

Residential Density

The next step is to estimate the density at which the identified residential acreage could be redeveloped. Per the County methodology, this should be a **forward-looking analysis which considers allowed and achieved densities and considers a slight increase in density over existing density**. The table below shows the minimum and maximum density in Ellensburg's residential zones which have specified densities in the zoning code. It also shows the average achieved density of projects built since 2020 and in the pipeline. Finally, the right column shows the assumed housing density used for this LCA, generally a slight increase over achieved densities per the County methodology. In the case of the CH and RCMU zone which have not seen recent multifamily development, the density assumption used in RH, where apartments have been built recently, was applied since the standards and locations of those zones are most similar to RH. In CCII, the same density as CC was used, based on recent

multifamily apartments in CC and similar zoning standards between the zones. In the MHP zone, an average density of Ellensburg's three existing mobile home parks was used to forecast the eventual build-out of those parks which still contain some vacant spaces.

Figure 11. Assumed Residential Densities for Zones Allowing Housing in Ellensburg Land Capacity Analysis

Zone	Minimum Density (du/ac)	Maximum Density (du/ac)	Achieved Density (2020-2025 and Planned Projects)	Assumed Housing Density for LCA (du/ac)
RS		6.0	2.9	**4.0**
RL	6.0	8.0	4.4	**6.0**
RM	8.0		9.2	**10.0**
RH	15.0		24.2	**25.0**
RO	8.0		6.0	**8.0**
CC			96.2	**100.0**
CC II				**100.0**
MHP			7.6*	**7.6**
RCMU				**25.0**
NCMU			16	**16.0**

Employment Density

To determine the density of employment capacity on the nonresidential acreage in Ellensburg, a job density assumption was developed for each zone and measured in jobs per acre. Per the County methodology, and similar to the housing density calculations above, achieved density of commercial development since 2020 was analyzed, as well as pending development, calculated in Floor Area Ratio (FAR). An assumed FAR based on recent development was selected, with IH using the same assumption as IL and the Mixed Use zones using similar assumptions to the CH and CC zones, respectively, based on staff feedback. These FAR assumptions were then multiplied by an assumed square feet per job metric from the County methodology to generate a job capacity per acre on available employment land, as shown below:

Figure 12. Assumed Employment Densities for Land Capacity Analysis

Zone	Achieved FAR since 2020	Pending (2020-2025+) FAR	FAR for LCA	Square Feet Per Job	Assumed Job Density for LCA (Jobs/Acre)
CH	0.3	0.1	**0.3**	400	**27.2**
CC	1.0	0.0	**1.0**	400	**108.9**
CC II	0.4		**0.4**	400	**39.1**
IL	0.1	0.2	**0.1**	800	**5.4**
IH			**0.1**	800	**5.4**
RCMU			**0.3**	400	**27.2**
NCMU			**0.4**	400	**39.1**

Additional ADU Capacity

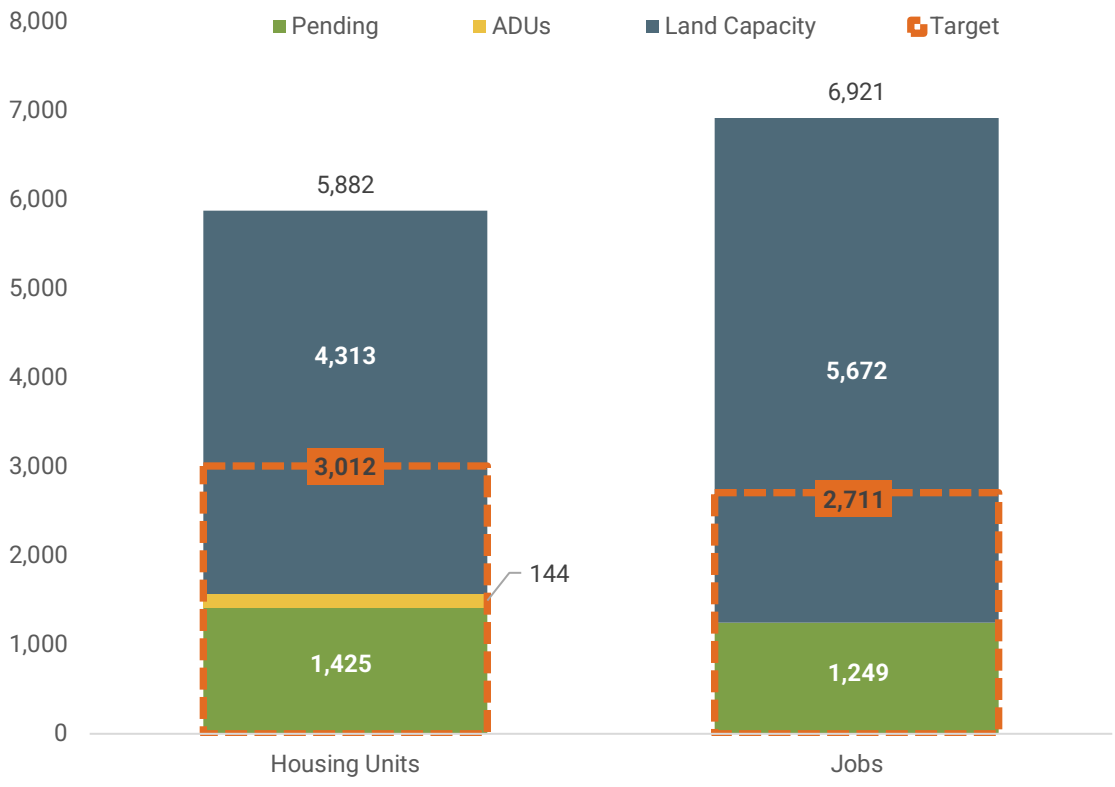
Additional capacity for ADUs was calculated **separately at a parcel level, since new ADUs can be constructed on any parcel where ADUs are allowed, regardless of whether or not it is classified as vacant, partially used, or**

under-utilized based on the criteria above. For this analysis, the total number of parcels in RL and RS which are currently listed as having a single-family use by the Kittitas County Assessor were totaled. Then, the total number of undeveloped parcels which could see single-family development in these zones were also added. This results in a total of 3,601 parcels where an ADU could be constructed over the planning horizon. The Department of Commerce suggests using an uptake rate of 2-5 percent of these parcels to estimate a reasonable ADU capacity over the planning horizon. In Ellensburg, an average of five ADUs have been permitted per year since 2020. Using a four percent uptake assumption would result in a **total ADU capacity of 144 units over the planning horizon,** or about seven per year. This represents a slight increase over recent trends, which is within reason when considering recent state legislation requiring that two ADUs will now be allowed on all lots in the city.

Results

Figure 13 shows the overall results of the housing and jobs capacity analysis. Pending units that have been developed since the 2020 baseline or are in the pipeline are indicated in green. The land capacity for housing and jobs, as calculated above, is displayed in blue. ADU capacity is shown in yellow. Under the assumptions described above, Ellensburg's **total housing capacity is 5,882 units** and the **employment capacity is 6,921 jobs**. The targets set by the County are highlighted in dashed yellow boxes. In total, Ellensburg has sufficient capacity to accommodate its housing and job targets, although the next step in the analysis is to break the housing units down by the potential income levels they can serve, which shows a deficit at lower income bands as described in the subsequent section of this report.

Figure 13. Ellensburg Land Capacity Analysis Results for Total Housing Units and Jobs, 2020-2046



Source: Kittitas County; Leland Consulting Group

Figure 14 below shows the breakdown of the total unit and job land capacity by zone, after applying the densities discussed above to the net acreage (less critical areas and infrastructure deductions) and subtracting units that would be lost to redevelopment. Note that pending units and ADUs are not included in the table below.

Figure 14. Housing Unit and Job Capacity by Zone in Ellensburg, 2025-2046

Zone	Description	Net Unit Capacity	Net Job Capacity
RS	Residential Suburban	**1,242**	**0**
RL	Residential Low Density	**175**	**0**
RM	Residential Medium Density	**847**	**0**
RH	Residential High Density	**74**	**0**
RO	Residential Office	**206**	**0**
CH	Commercial Highway	**0**	**4,002**
CC	Central Commercial	**454**	**173**
CC II	Central Commercial II	**807**	**136**
MHP	Manufactured Home Park	**34**	**0**
IL	Industrial Light	**0**	**333**
IH	Industrial Heavy	**0**	**18**
PR	Public Reserve	**0**	**0**
RCMU	Regional Center Mixed Use	**401**	**861**
NCMU	Neighborhood Center Mixed Use	**72**	**150**
	Total	**4,313**	**5,672**

Housing Needs by Income Band

Updates to the GMA resulting from HB1220, now codified in RCW 36.70A.070(2), require jurisdictions to analyze their housing capacity by what household income level the new units can serve, as a percentage of Countywide AMI. Each county establishes income-based projections for each city within the county, and the cities must then demonstrate that they have sufficient land capacity for the number of units allocated in each income band, as well as capacity for emergency housing unit projected needs. Ellensburg's projected housing unit needs for the 2020-2045 period are shown below.

Figure 15. Ellensburg Projected Housing Needs by Income Band, 2020-2046

Income Band (% AMI)	0-30 Non-PSH	0-30 PSH	30-50	50-80	80-100	100-120	120+	Total
Net New Units 2020-2045	1,376	417	757	184	141	137	0	**3,012**

Source: Kittitas County

Land Capacity by Income Band

Following Department of Commerce guidance, analyzing land capacity by income band is accomplished by grouping zones into zone categories based on the housing types that are allowed and then grouping those categories by the lowest potential income level that could be served by the housing types in that zone category. The table below in Figure 16 shows the Department of Commerce's guidance on the relationship of housing types to income levels and land capacity. These "moderate-cost" income band classifications are recommended for communities outside the Puget Sound region.

Note that the Commerce table shown below in Figure 16 includes columns for both assumed income bands that can be served by market-rate development and assumed income bands that can be served by subsidized development (i.e. income-restricted low-income housing funded through the Low Income Housing Tax Credit or Multifamily Tax Exemption, etc.). Following Commerce guidance, zones are categorized based on the lowest *potential* income that can be served, including by subsidized development, in the zone. **This does not imply that the entire zone will be built out with subsidized or deeply subsidized units, but it does indicate that the zone *allows* those types of units to be built without undue regulatory barriers, as required by the GMA**. Commerce guidance also indicates that jurisdictions should document available sources of subsidy that may be used over the planning horizon in order for the capacity for lower income units, particularly under 50 percent AMI, to be realized. This is found in the "Adequate Provisions" analysis in Appendix xxxx

Figure 16. Department of Commerce Guidance on Income Band Classification (Moderate-Cost Communities)

Zone category	Typical housing types allowed	Lowest potential income level served		Assumed affordability level for capacity analysis
		Market rate	With subsidies and/or incentives	
Low Density	Detached single family homes	Higher income (>120% AMI)	Not typically feasible at scale*	Higher income (>120% AMI)
Moderate Density	Townhomes, duplex, triplex, quadplex	Moderate income (>80-120% AMI)	Not typically feasible at scale*	Moderate income (>80-120% AMI)
Low-Rise Multifamily	Walk-up apartments, condominiums (2-3-floors)	Low income (>50-80% AMI)	Extremely low and Very low income (0-50% AMI)	Low income (0-80% AMI) and PSH
Mid-Rise Multifamily	Apartments, condominiums	Low income (>50-80% AMI)	Extremely low and Very low income (0-50% AMI)	Low income (0-80% AMI) and PSH
ADUs (all zones)	Accessory Dwelling Units on developed residential lots	Low income (>50-80% AMI)	N/A	Low income (>50-80% AMI) – Group with Low-Rise and/or Mid-Rise Multifamily

Source: Washington Department of Commerce "Guidance for Updating Your Housing Element" (August 2023, Updated September 2024)

To corroborate the income band classifications shown above for *market rate* units, CoStar data on rents and Redfin data on home sales was analyzed and compared to Kittitas County's AMI. Figure 17 shows sales prices for single-family and middle housing in Ellensburg, for all sales regardless of age of housing unit as well as for sales of recently built units. Newly built single-family homes are serving households earning 130 percent AMI and higher, confirming the Commerce assumptions above for single-family homes. Note that median sales prices indicate that some single-family homes are serving moderate-income households earning less than 120 percent AMI, but since the LCA is focused mostly on new housing production, the income band assumptions based on

homes built since 2020 were used. For middle housing, there was not sufficient data available on recent sales prices of 2-6 unit buildings, but the table shows the average sales price for all condos and townhomes in Ellensburg as a proxy. Although these are not necessarily new units, it does demonstrate that attached products and condos are selling for significantly less than single-family homes in the city. Finally, the table also shows that recently built mobile homes in the city are selling for prices affordable to households in the 60-80 percent AMI range, on average.

Figure 17. Market Sales Prices of Housing Units by Type in Ellensburg

	Sale Price	Affordable to AMI %
Single-Family		
Median 2025 Sales Price (All Single-Family Homes)	$430,839	110%
Average Price of 199 Homes Built and Sold Since 2020	$509,950	130%
Middle Housing		
Median 2025 YTD Sale Price (All Condos/Townhomes)	$297,375	76%
Mobile Homes		
Average Price of 48 Homes Built and Sold Since 2015	$268,012	68%

Source: Redfin, Leland Consulting Group, HUD
Note: Assumes 20% down payment, 6.5% interest rate, 30-year mortgage, 0.9% property tax rate, and $5/$1,000 insurance rate.

Figure 18 shows market rents for all multifamily apartments in Ellensburg and for recently developed apartments, by unit size. It then shows the corresponding percentage of AMI that households of various sizes would need to afford the rent, based on HUD income limits by household size. Overall, most renters earning 80 percent AMI would be able to afford an apartment in the city at an appropriate size for their household. Some 3-person households at 80 percent AMI or below may struggle to afford to rent an apartment in recently built projects. This data only captures rents in multifamily buildings reported by CoStar. For comparison, data from the Washington Center for Real Estate Research reports an average rent citywide of **$1,265**, which also includes rentals of single-family units. These rents would be affordable to **all household sizes at 80 percent AMI or below**. Overall, this data suggests that **the majority of renters in Ellensburg can afford a unit without being cost-burdened if their incomes are at 80 percent of the AMI**.

Figure 18. Market Multifamily Rents in Ellensburg, September 2025

	Average Monthly Rent	% of AMI Needed for 1-Person Household	% of AMI Needed for 2-Person Household	% of AMI Needed for 3-Person Household
HUD Income Limit		$75,400	$86,200	$97,075
Average Rent per Studio Unit (all)	$821	44%	38%	---
Average Rent per 1-Bedroom Unit (all)	$973	52%	45%	40%
Average Rent per 1-Bedroom Unit (Built Since 2020)	$1,342	71%	62%	55%
Average Rent per 2-Bedroom Unit (all)	$1,139	60%	53%	47%
Average Rent per 2-Bedroom Unit (Built Since 2020)	$1,598	85%	74%	66%
Average Rent per 3-Bedroom Unit (all)	$1,415	75%	66%	58%
Average Rent per 3-Bedroom Unit (Built Since 2020)	$1,852	98%	86%	76%

Source: CoStar, HUD Income Limits, Washington State Housing Finance Commission, Leland Consulting Group
Note: Assumes households can spend 30 percent of their income on rent/housing costs without being cost-burdened.

Based on this cost analysis and the types of housing allowed in each of Ellensburg's zoning districts, the table below shows the income-band classifications for each zone in the city.

Figure 19. Affordability Levels by Zone for Ellensburg LCA

Zone	Zone Description	Share of Zone	Housing Types	Assumed Affordability Level for Capacity Analysis (% of AMI)
RS	Residential Suburban	100%	Detached Single-Family	120% +
RL	Residential Low Density	90%	Detached Single-Family	120% +
		10%	Middle Housing (Plexes, Townhomes)	80-120%
RM	Residential Medium Density	40%	Detached Single-Family	120% +
		20%	Middle Housing (Plexes, Townhomes)	80-120%
		40%	Multifamily	0-80%
RH	Residential High Density	25%	Middle Housing (Plexes, Townhomes)	80-120%
		75%	Multifamily	0-80%
RO	Residential Office	80%	Detached Single-Family	120% +
		20%	Multifamily	0-80%
CH	Commercial Highway	100%	Multifamily	0-80%
CC	Central Commercial	100%	Multifamily	0-80%
CC II	Central Commercial II	100%	Multifamily	0-80%
MHP	Manufactured Home Park	100%	Manufactured Homes	80-120%
RCMU	Regional Center Mixed Use	100%	Multifamily	0-80%
NCMU	Neighborhood Center Mixed Use	100%	Multifamily	0-80%

Pending Units by Income Band

In addition to land capacity on vacant, partially used, and under-utilized parcels, the pending units discussed previously on p. 3 were also categorized by what income band they can serve. This is primarily based on development type, similar to the methodology above, and supplemented by data on known affordable projects or expected shares of single-family and middle housing in planned and proposed developments and subdivisions. The table below shows the allocations of the 1,425 pending units by income band:

Figure 20. Pending Units and Capacity Allocations by Zone Category

Housing Types	Pending Units	Assumed Affordability Level for Capacity Analysis
Detached single-family homes	937	120% AMI
Middle housing types including duplexes and townhomes, manufactured homes	159	80-120% AMI
Multifamily apartments	329	0-80% AMI

Totals by Income Band

The table below shows Ellensburg's targets, pipeline units, total capacity, and surplus/deficit by income band. Per the Department of Commerce's *Guidance for Updating Your Housing Element*, income bands are aggregated into three categories: 0-80% AMI, 80-120% AMI, and 120% AMI and higher, since the typologies that can serve these aggregated income ranges are the same, and the capacity analysis is based on land use and zoning. In particular, multifamily apartments are the most likely housing type to serve all income bands under 80 percent AMI, with different subsidy levels needed for each granular income band within the larger 0-80 percent category. Since these aggregated income bands can be served by the same housing types, and therefore the same land use or zoning districts, it is not meaningfully possible to disaggregate physical zoned land capacity between the more granular income bands at this point in the analysis. Showing land capacity for a variety of housing types, and for multifamily housing that can serve multiple income bands within the same zoning district is the first step in planning for affordable housing. Discussing the subsidies, financing programs, and other measures that would be necessary to actually see that housing built is a subsequent step, described in detail in Commerce's guidance under the "Adequate Provisions" analysis methodology. Ellensburg's Adequate Provisions analysis, which builds on the land capacity discussion in this report, can be found in Appendix xxx.

As shown below in Figure 21, under current zoning, Ellensburg has sufficient capacity for housing serving households earning 80 percent of the AMI and above, but a deficit of land capacity to serve households earning under 80 percent AMI during the 2020-2046 planning horizon. Therefore, per Commerce Guidance and the GMA, the city will need to make zoning and/or regulatory changes to increase capacity for housing that can serve these income bands and adopt them concurrently with this Comprehensive Plan update.

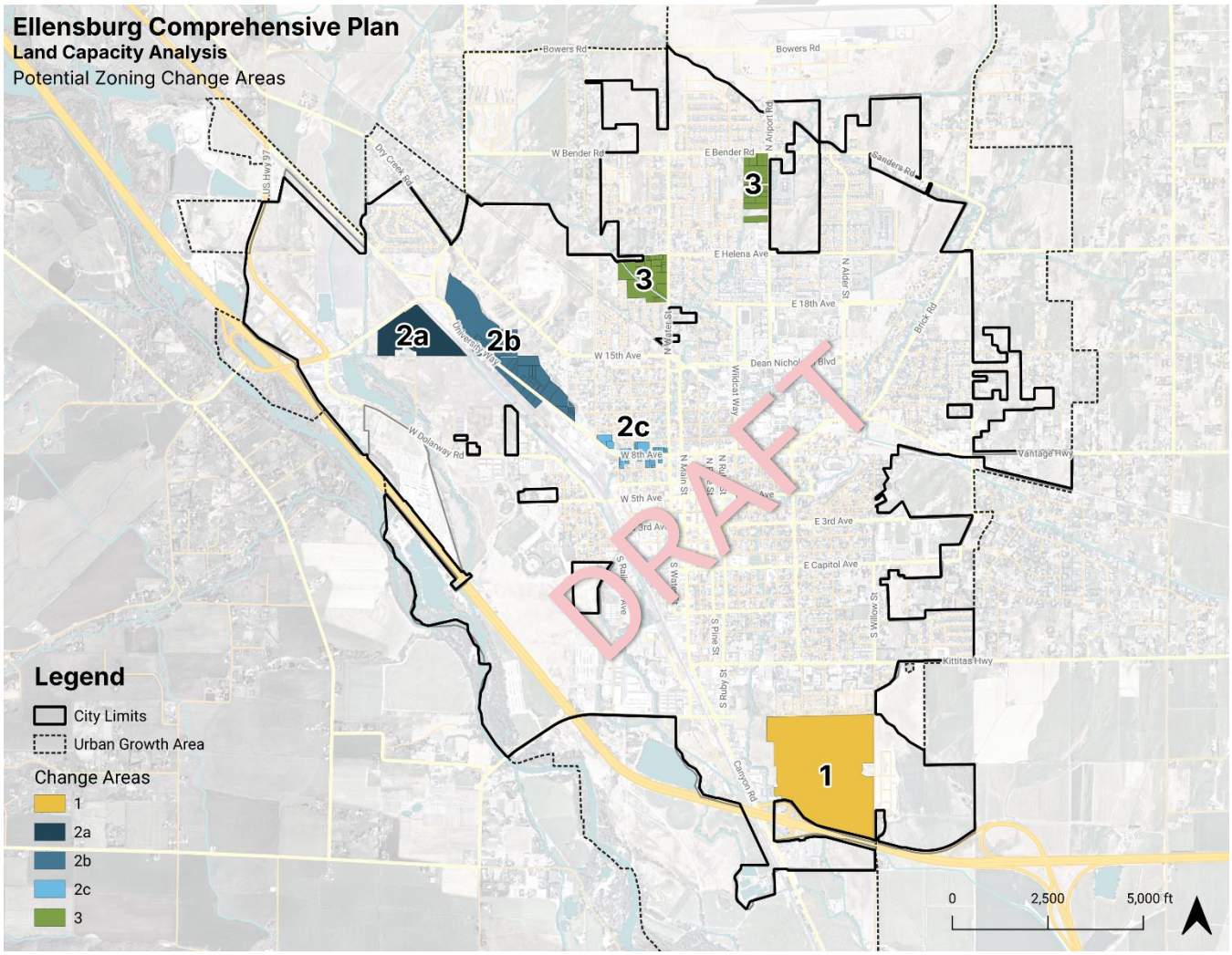
Figure 21. Ellensburg Land Capacity Analysis by Income Band Results under Current Zoning, 2020-2046

Income Band	Housing Needs	Aggregated Housing Needs	Pending Units	Remaining Needs	Total Capacity	Surplus/ Deficit
0-30 PSH	417	2,734	329	2,405	2,314	**(91)**
0-30 Non PSH	1,376					
30-50	757					
50-80	184					
80-100	141	278	159	119	240	**121**
100-120	137					
120+	0	0	937	-937	1,903	**2,840**
Total	**3,012**	**3,012**	**1,425**	**1,587**	**4,457**	**2,870**

Options to Address Low-Income Deficit

As shown above, Ellensburg has insufficient capacity to serve projected household needs under 80 percent AMI. To address this deficit, staff and the consultant team have proposed a number of options for increasing capacity for multifamily housing in the city. (Note that, as discussed above, these options are exploring the potential to create increased *capacity of land zoned for multifamily housing* that has the potential to serve lower-income households. Subsidy will also be required to construct these affordable units, which is discussed further in the "Adequate Provisions" analysis). The map below shows the three potential targeted areas of zoning change:

Figure 22. DRAFT Potential Zoning Change Areas



- **Area 1** is a large vacant parcel where the "Canals of Ellensburg" development had been proposed in recent years. This was a large-scale proposed development project, but the developer is no longer moving forward with the project. Therefore, the parcel was classified as "Vacant" in the LCA, as shown above in Figure 8. Currently, this parcel is zoned RS (Residential Suburban), which only allows low-density development. If this parcel were rezoned to NCMU, this would allow for a wider variety of housing types, including multifamily, as well as commercial development on the parcel. Using the same NCMU assumptions detailed in the LCA methodology above (50 percent residential, 16 dwelling units per acre

and 39.1 jobs per acre), this rezone would increase multifamily capacity (with the potential to serve 0-80 percent AMI households) by **887 units**.

- **Area 2** comprises three sets of parcels currently zoned CH (Commercial Highway). In these areas, multifamily is already allowed as a conditional use, but the CH zone has not seen multifamily development in recent years. Rather than proposing to change development regulations in the entire CH zone, staff has proposed three targeted areas which may make sense to change the zoning to a mixed-use designation to provide opportunity for by-right multifamily development in areas which have more potential for denser mixed-use development based on their proximity to employment opportunities and transit. Areas 2a and 2b are proposed to be rezoned to RCMU (30 percent residential, 25 units per acre, 27.2 jobs per acre), which would still allow for a reasonable amount of commercial development, and area 2c, closer to downtown, would be rezoned to CC II (50 percent residential, 100 units per acre, 39.1 jobs per acre). Together, these areas would add the capacity for **674 additional units** of multifamily housing.
- **Area 3** comprises two areas of R-L and R-S zoning that are already adjacent to higher density housing development. These could be rezoned to R-H to compliment the neighboring areas, which would add additional capacity for **419 units** of multifamily housing.

The table below shows the additional multifamily capacity generated by these proposed rezones. Note that not all of this capacity for multifamily housing would necessarily serve households earning under 80 percent AMI. Thus, having a surplus of land capacity for multifamily units that can serve lower-income households can help the city ensure sufficient capacity to meet its housing targets at all income levels. Additionally, as noted above, these proposed rezones are intended to add to Ellensburg's zoned capacity for housing types that can serve lower-income households. Significant funding and subsidy, in addition to developer interest and capacity, will also be needed in order for these units to be built, as discussed in more detail in the "Adequate Provisions" analysis in Appendix xxx.

Figure 23. DRAFT Additional Multifamily Capacity Resulting From Proposed Rezones in Ellensburg

Number	Description	Additional Multifamily DU Capacity
1	Rezone Canals of Ellensburg from CH to NCMU	887
2a	Rezone from CH to RCMU	246
2b	Rezone from CH to RCMU	289
2c	Rezone from CH to CC-II	139
3	Rezone from R-L/R-S to RH	419
	Total	**1,980**

In addition to these proposed rezones, staff is also proposing to **consolidate the R-S and R-L zones** into a single zone which allows for more flexibility for townhomes and duplexes compatible with the predominant single family residential uses, consistent with the city's housing action plan goal of adding more variety to the housing stock and strategies for development of more of these housing types. For the purposes of understanding the impacts of this rezone on land capacity, parcels in R-S were reassigned to R-L with the assumed R-L density of 6 units per acre. Parcels currently zoned R-S which are in the airport overlay, which has a maximum density of 3 units per acre, were not assumed to redevelop with this increased density. These changes did not have an impact on lower-income capacity, since R-L and R-S are unlikely to acommodate housing types that can serve households earning under 80 percent AMI, but did slightly change the capacity at income bands above 80 percent AMI.

The table below shows **revised LCA results incorporating all of the proposed zoning changes noted above** – the rezones of areas 1-3, and the consolidation of R-S and R-L (excepting parcels in the airport overlay). As shown, these changes result in a **significant surplus at all income levels**, allowing Ellensburg to meet its required housing targets as well as provide a **substantial buffer** which ensures sufficient capacity for lower-income housing, since housing in multifamily zones may not all develop at lower income levels, particularly deeply subsidized housing. Note that these rezones also provide surplus capacity at all income levels without any proposed annexations or changes to the UGA boundaries.

Figure 24. DRAFT Ellensburg Land Capacity Analysis by Income Band Results under Proposed Rezones, 2020-2046

Income Band	Housing Needs	Aggregated Housing Needs	Pending Units	Remaining Needs	Total Capacity	Surplus/ Deficit
0-30 PSH	417	2,734	329	2,405	4,290	**1,885**
0-30 Non PSH	1,376					
30-50	757					
50-80	184					
80-100	141	278	159	119	423	**304**
100-120	137					
120+	0	0	937	-937	1,438	**2,375**
Total	**3,012**	**3,012**	**1,425**	**1,587**	**6,151**	**4,564**

Emergency Housing Land Capacity Analysis

In addition to permanent housing, jurisdictions are required to show sufficient land capacity to accommodate their allocation of Emergency Housing and Emergency Shelter under RCW 36.70A.070(2)(c). However, Commerce's Housing for All Planning Tool (HAPT) indicates that Kittitas County already has a sufficient capacity of Emergency Housing and Emergency Shelter to accommodate the projected need during the 2020-2046 planning horizon, as shown below. Therefore, an Emergency Housing Land Capacity Analysis for the City of Ellensburg is not required.

Figure 25. Detail from Kittitas County Housing for All Planning Tool (HAPT) Showing No New Emergency Housing Needed Countywide 2020-2046

Table 2: Projected Countywide Housing Needs Based on User Inputs

Kittitas County

Population Target = 60,621

	Affordability Level (% of Area Median Income)								
		0-30%							Emergency Housing/Shelter Beds
	Total	Non-PSH	PSH	30-50%	50-80%	80-100%	100-120%	120%+	
Total Future Housing Needed (2046)**	25,601	2,763	582	3,858	6,741	3,131	2,824	5,702	119
Estimated Housing Supply (2020)*	19,975	841	1	2,799	6,330	2,814	2,519	4,671	119
Net New Housing Needed (2020-2046)	5,626	1,922	581	1,059	411	317	305	1,031	0

Source: Washington Department of Commerce, Kittitas County

Appendix A – Kittitas County LCA Methodology

#	Step	Definition/Reason	Method/Assumptions	Data Source	Required Output (where applicable)
1	Base point in time	Determine the point in time at which land capacity will be analyzed. Land use or zoning changes that occur after this point in time should not be considered within the LCA.	December 31st, 2024 is the base point in time for the LCA.	Jurisdiction Code and county assessor data	
2	Study area boundaries	Define the spatial boundary that each jurisdiction will analyze as part of the LCA.	Each City will analyze their respective incorporated city property. The County will analyze unincorporated UGA properties and unincorporated rural properties.	Allocations to each area are on the adopted HAPT output table.	
		Data Collection and Calculating Gross Developable Land Inventory			
3	Parcel Data	County Assessor Parcel data is a dataset which has important information that will be used in the LCA. Note information such as: land value, improvement value, zoning designation, lot size, parcel number, legal description, owner, tax exemption, and building footprint (if available).	County parcel data can be requested from the County or downloaded off their open data portal. The parcel analysis can happen within GIS or excel.	County Assessor.	
4	Pipeline Development	Identify and remove all properties with pipeline developments in order to not double count capacity in the LCA. The HAPT results are based on the existing housing supply in 2020 so pipeline developments include parcels which have been built out since Jan 1, 2020. Any development that has occurred between 2020 and 2025 should be identified as "capacity" and the underlying parcels should be removed from the LCA.	Pipeline developments **include the following between Jan 1, 2020 and Dec 31, 2024**: - Housing units built. - Square footage of commercial developments built - Approved building permits. - Approved subdivisions. - Vested applications (including those vested before 2020). Approved commercial developments. - Pre-application meetings may be considered depending on local circumstances and staff knowledge that the application will develop as applied. Document this information into total pipeline units per zone and total commercial floor area per zone. This information will be used in the final capacity formula.	Jurisdiction-specific permitting data.	- Pipeline parcels, - Number of pipeline units and commercial area by zone, and - Pipeline unit types by zone.
5	Easements and tracts	Remove areas in easements and tracts. Easements are typically placed over utilities and shared access roads. Tracts are typically native growth protection areas, commonly owned property (landscaping, open space, etc.), and drainage areas. Typically, it is unlikely for structures to be built over an existing tract or easement.	Use plat information, utility provider easement data, and County parcel data to map easements and tracts in each zone. Remove these areas from the total developable area of each zone.	Local easement maps, utility providers, and old plats. County parcel data.	- Undevelopable area total by zone from easement and tract removal.

#	Step	Definition/Reason	Method/Assumptions	Data Source	Required Output (where applicable)
6	Publicly owned and tax-exempt properties	Remove publicly owned and tax-exempt properties from further analysis. These properties generally include churches, schools, utility buildings, parks, and other protected lands. Most land owned by governments or public agencies is unlikely to be developed for housing in the near future and should be excluded from the available land supply. Other local factors such as historic districts or ownership by a non-profit organization should also be considered for removal when identifying public-use properties.	Use county parcel data to search for tax exempt properties. Use local zoning data to identify publicly zoned lots. Refine this search using local knowledge. Remove these areas from the total developable area of each zone.	County parcel data, local zoning data, aerial imagery, and local knowledge.	- Undevelopable area total by zone from publicly owned or tax-exempt property removal.
7	Other lands that should be removed	**Jurisdictions should use local circumstances to identify other specific types of developments that are unlikely to develop/redevelop.** Examples of properties to consider removed are condos and gas stations. Condominiums may show up in the results due to the relatively low improvement to land value of any one unit, however, the aggregate improvement to land value generally makes condominiums unlikely to redevelop. Gas stations often have a low improvement to property value because they generally have very limited facilities and expensive real estate; however, they are highly unlikely to redevelop. These parcels should be excluded from further analysis.	Use aerial imagery and County parcel data to search for condos and gas stations. Remove these areas from the total developable area of each zone. Document reasoning used if any area was removed which was not identified in this methodology.	County parcel data, aerial imagery, and local knowledge.	- Undevelopable area total by zone from other factors.
8	Critical Areas	Remove critical areas from the area of each zone. Certain critical areas create undevelopable conditions on properties. These critical areas include **steep slopes, streams, wetlands, floodways, and critical area buffers**. Therefore, these areas should be mapped, labeled as undevelopable area, and removed from the LCA. Critical area buffers impact the developable area of a lot. The intensity of impact depends on local regulations. Buffer area for critical areas should be assumed to be the actual buffer or an average buffer for unrated critical areas using local regulations. Buffers should be mapped for each zone.	Use City, County, and/or State publicly available critical area GIS data to map critical areas (in order of locally available information up to state information). This data can be reinforced with any local studies. Use local regulations to define buffers for each critical area. Use the average buffer distance from all ratings for that critical area when exact rating of a critical area is unknown. Remove these areas from the total developable area of each parcel. The remaining area in each zone at this step is the Gross Developable Land.	City, County, and State critical area information.	- Map of critical areas and - Gross Developable Land total by zone (**see example below**).
	EXAMPLE TABLE				

Zone	Gross zone area (acres)	Gross Developable Land (acres)
Single Family Residential (R-4)	856	588
Medium Density Residential (R-8)	512	256
Multifamily Residential (R-30)	356	301
Mixed-use (MU-1)	250	233
Commercial (CB)	644	406

#	Step	Definition/Reason	Method/Assumptions	Data Source	Required Output (where applicable)
9	Analysis Parcels	**The next section will use the Gross Developable Land of each Analysis Parcel to categorize them into four LCA types.** All parcels which were categorized as unlikely to develop in Steps 4-7 were removed from each zone. Step 8 removed critical areas from parcels.	The remaining parcels after Steps 4-8 are the land capacity analysis parcels (Analysis Parcels). The remaining parcel area after Steps 4-8 is the Gross Developable Land of each parcel. Fully developed parcels will be removed in Step 14.	Local analysis	- Analysis Parcels - Gross Developable Land of each Analysis Parcel.
	LCA Types				
10	Vacant Parcels	**For use in all zones.** Parcels of land that contain no structures or have buildings with low assessed value. Vacant parcels have the lowest base market factor because they have the highest likelihood of developing during the planning period.	Where County parcel data designates the parcel as vacant or if the improvement value is less than $10,000. Vacant parcels can be reviewed through aerial imagery to ensure that any non-vacant parcels were captured in the initial search. Label these parcels as "Vacant".	County parcel data	- Count of Vacant parcels by zone and - Total Developable Area of Vacant parcels by zone.
11	Partially used Parcels	**For use in rural and single-family zones.** Parcels occupied by an existing use, but which include enough land to be further subdivided for additional development without rezoning. For example, a 1-acre lot zoned for four units per acre that contains one single-family home could be subdivided to allow development of up to three additional units. Partially used Parcels have a scaling market factor depending on the existing lot size and density.	In single-family and rural zones: search for all parcels that are three times larger (>=3) than the allowed minimum lot size. For single-family and rural zones that use max density, search for parcels with an existing density three times or less (<=3) of the max allowed density. **Label these parcels as "Partially used"**. Document the number of existing housing units on these parcels. Search for parcels with homes worth (improvement value) more than the 75th (>75th) percentile of home values in the jurisdiction. **Remove >75th percentile improvement value lots from further analysis.**	County parcel data	- Number of Partially used parcels, - Total Developable Area of Partially used parcels by zone, and - Total number of existing housing units on Partially used parcels. - Current number of housing units by parcel should be determined based on Assessor land use codes and parcel improvement value. Assume no more than one unit per parcel unless better information is available.
12	Under-utilized Parcels	**For use in multi-family, mixed-use, commercial, and industrial zones**. Parcels that are likely to redevelop to a more intensive land use than that which currently occupies the property, either due to market forces or because applicable zoning allows a more intensive use than the current development. For example: A single-family home on property in a multifamily zone. A multifamily residential property developed at a density below that allowed by the applicable zone. A property with relatively low improvement value compared to the value of the land.	For multi-family, mixed-use, commercial, and industrial zones, calculate the improvement-to-land value ratio of each parcel. **Parcels with an improvement value to land value ratio below 1.0 should be labeled as "Under-utilized".** Single-family homes in these zones should also be labeled as "Under-utilized". Document the number of existing housing units or existing commercial/industrial floor area on these parcels. See the Deductions and Market Factors section for more information on specifying deductions for different zones.	County parcel data	- Number of Under-utilized parcels, - Total Developable Area of Under-utilized parcels by zone, and - Total number of existing housing units or commercial square footage on Under-utilized parcels.
13	Full Developed Parcels	Fully Developed parcels are all parcels which do not fit into either Pipeline, Vacant, Partially used, Under-utilized, or Undevelopable categories.	Label the remaining parcels as "Fully Developed". These parcels will not be used for this analysis as these parcels are assumed to have no capacity for additional development under current zoning regulations.	County parcel data	- Fully developed parcels.
14	LCA parcel summary	Summarize developable area of each LCA type by zone	For each zone, add up the developable area for each LCA parcel type: Vacant, Partially used, and Under-utilized.	Local analysis	- Table showing each zone and the Developable Area of each zone by LCA type (example below).

#	Step	Definition/Reason	Method/Assumptions	Data Source	Required Output (where applicable)
	EXAMPLE TABLE		<table><tr><th>Zone</th><th>Gross Developable Land (acres)</th><th>LCA Type</th><th>Developable Area (acres)</th></tr><tr><td>Single Family Residential (R-4)</td><td>588</td><td>Vacant</td><td>41</td></tr><tr><td></td><td></td><td>Partially used</td><td>102</td></tr><tr><td>Medium Density Residential (R-8)</td><td>256</td><td>Vacant</td><td>18</td></tr><tr><td></td><td></td><td>Partially used</td><td>20</td></tr><tr><td>Multifamily Residential (R-30)</td><td>301</td><td>Vacant</td><td>28</td></tr><tr><td></td><td></td><td>Under-utilized</td><td>104</td></tr><tr><td>Mixed-use (MU-1)</td><td>223</td><td>Vacant</td><td>16</td></tr><tr><td></td><td></td><td>Under-utilized</td><td>67</td></tr><tr><td>Commercial (CB)</td><td>406</td><td>Vacant</td><td>68</td></tr><tr><td></td><td></td><td>Under-utilized</td><td>121</td></tr></table>		
	Deductions and Market Factors				
15	Vacant parcel deduction	The Vacant parcel deduction accounts for some portion of the remaining developable land supply may remain unavailable for development during the planning period due to site conditions, economic factors, or unwillingness to develop or sell on the part of the property owner.	15% in unincorporated rural areas. 10% in UGAs.	Consistent with State guidance.	Alternatively, if a community has conducted specific market factor analysis, such as analysis performed under the requirements of the buildable lands program, the results of that evaluation may be used here, provided the jurisdiction documents the analysis and associated assumptions.
16	Partially used parcel deduction	The Partially used parcel deduction accounts for some portion of the remaining developable land supply may remain unavailable for development during the planning period due to site conditions, economic factors, or unwillingness to develop or sell on the part of the property owner.	25%	Consistent with State guidance.	
17	Under-utilized parcel deduction	The Under-utilized parcel deduction accounts for some portion of the remaining developable land supply may remain unavailable for development during the planning period due to site conditions, economic factors, or unwillingness to develop or sell on the part of the property owner.	25%	Consistent with State guidance.	
18	Infrastructure deduction	New development generally requires new infrastructure improvements (roads, utilities, landscaping, open space, etc.). These improvements occupy land, reducing the acreage available for housing development. The amount of the deduction for infrastructure can vary by location and development status. For example, redevelopable land and infill vacant lots in urban areas may already be partially or fully served by existing infrastructure and may require a smaller deduction than greenfield areas.	5-15% depending on specific circumstances of each zone. (Suggested: 15% for rural county and unincorporated UGA. 5-10% scaling by zone for cities, depending on availability of infrastructure).	Local circumstances and staff analysis. Consistent with discussions with city/county staff.	- Infrastructure deduction for each zone.

#	Step	Definition/Reason	Method/Assumptions	Data Source	Required Output (where applicable)
19	Net Developable Area	Net Developable Area is the remaining developable area after applying the LCA parcel type deduction and the Infrastructure deduction.	Apply the deduction to the previous Developable area of each zone in the following order: 1. LCA Parcel specific deduction; 2. Infrastructure deduction; The remaining area is the Net Developable Area of each zone. See example below.	Local analysis.	- Net developable acreage of each zone.
	EXAMPLE TABLE				

Zone	LCA Type	Developable Area (acres)	LCA Parcel deduction	Infrastructure deduction	Net Developable Area (acres)
Single Family Residential (R-4)	Vacant	41	10%	10%	**102.06**
	Partially used	102	25%		
Medium Density Residential (R-8)	Vacant	18	10%	10%	**28.08**
	Partially used	20	25%		
Multifamily Residential (R-30)	Vacant	28	10%	5%	**98.04**
	Under-utilized	104	25%		
Mixed-use (MU-1)	Vacant	16	10%	5%	**61.42**
	Under-utilized	67	25%		
Commercial (CB)	Vacant	68	10%	10%	**136.76**
	Under-utilized	121	25%		

Excel formula can be found in the attached excel file.

	Housing and Employment Capacity				
20	Assumed Density for zones allowing residential development	Assign assumed residential densities to each zone that allows residential development. The LCA is a forward-looking analysis. Jurisdictions should focus on the level of development expected to occur during the planning period. Assumed densities for use in the LCA should consider: - The maximum and minimum densities allowed under current zoning, - Historically achieved residential densities, - Any factors which may cause trends to change in the future. In some cases, achieved densities will be similar to maximum allowed densities. However, many factors beyond the control of cities and counties can influence the level of future development. Therefore, compare allowed densities to achieved densities	Local jurisdictions will develop their own assumed densities. When developing assumed densities for each zone, do not take into account any decrease in assumed density due to infrastructure, critical areas, or property owner willingness. These deductions have already been made in previous sections of the methodology. Consider a slight increase in density over existing density in urban zones. At a minimum, assumed densities should reflect the current achieved residential densities for each zone but should not exceed the maximum density allowed by right under the development code. In mixed-use zones and areas regulated under form-based codes, assumed residential densities must consider the potential development of non-residential uses. To avoid counting more residential capacity than will develop over the planning period, jurisdictions must account for non-residential uses when calculating capacity in these zones. Mixed-use and form-based development	Local analysis.	- Assumed densities for each zone that allows residential development. The 2012 Commerce UGA Guidebook and WAC Sections 365-196-210(6), 365-196-310(4)(b)(ii)(E) and 365-196-325(2) establish guidance on the factors that should be considered when establishing growth and density assumptions for a land capacity analysis.

#	Step	Definition/Reason	Method/Assumptions	Data Source	Required Output (where applicable)
		to identify zones that have historically underperformed relative to planned levels of development.	regulations can vary by geography and urban context, so jurisdictions should choose an approach that is most consistent with their development code**. Assume 50% residential and 50% commercial for mixed-use as a baseline.**		
21	Gross Residential Capacity	Calculate housing capacity by zone using the Assumed Density of each zone which allows residential and the Net Developable Area of each zone.	For each zone, multiply their respective Assumed Density by their Net Developable Area. The result is the Gross Residential Capacity for each zone. Add up all the zones to get total Gross Residential Capacity.	Local analysis.	- Gross Residential Capacity for each zone and for study area.
22	Net Residential Capacity	Add pipeline units and subtract existing units from Partially used and Under-utilized parcels per zone to get Net Residential Capacity by zone	Add pipeline units and subtract existing units from Partially used and Under-utilized LCA parcels by zone to get Net Residential Capacity. See the table below for an example.	Local analysis.	- Net Residential Capacity in dwelling units for each zone and for study area.
	EXAMPLE TABLE				
23	Calculate net commercial and industrial floor area	Use existing floor-area-ratio (FAR) in zones allowing commercial and industrial zones to determine total commercial and industrial floor area by zone in square feet.	Calculate assumed FAR using existing commercial and industrial developments (FAR is built floor area divided by site area). - Multiply net commercial and industrial developable area by the assumed FAR for each zone to get gross floor area capacity. - Multiply by 95% (generic occupancy rate) to get assumed occupied floor area capacity. - Subtract existing building square footage on partially used and under-utilized land. - **Add in floor area of pipeline commercial and industrial development to get net commercial and industrial floor area capacity by zone.**	Local analysis.	- Net commercial and industrial floor area in square feet.
24	Assumed Employment Density	Use generic commercial and industrial employment density assumptions to calculate employment capacity. Assumed densities can be adjusted using local knowledge and analysis. Ranges of assumed employment densities have been provided.	Commercial density: 300-500 square feet per employee. Industrial density: 700-900 square feet per employee.	Consistent with State guidance and previous discussions with cities/county. Local analysis.	- Assumed commercial and industrial density by zone.
25	Job Capacity	Calculate total job capacity by zone using the Assumed Employment Density of each zone and the net commercial and industrial floor area of each zone.	Multiply Assumed Employment Density and net floor area of each zone to get **total Employment Capacity of each zone. Add up the Employment Capacity of each zone to get total Employment Capacity for the study area.** **See example below.**	Local analysis.	- Total Employment Capacity in jobs for each zone and by the study area.

Zone	Net Developable Area (acres)	Assumed Density (du/ac)	Gross Residential Capacity	Add Pipeline Units	Subtract existing units on lots	**Net Residential Capacity**
Single Family Residential (R-4)	102.06	6	612	80	246	**590**
Medium Density Residential (R-8)	28.08	12	337	188	84	**505**
Multifamily Residential (R-30)	98.04	32	3,137	242	104	**3,275**
Mixed-use (MU-1)	61.42	20	1,228	40	67	**1,201**
Study Area Total	**289.60**		**5,315**	**550**	**501**	**5,572**

#	Step	Definition/Reason	Method/Assumptions	Data Source	Required Output (where applicable)
	EXAMPLE TABLE				

Zone	Net Developable Area (acres)	Assumed FAR	Floor Area	Apply 95% Occupancy Rate	Add Pipeline Floor Area	Subtract existing floor area on lots	Assumed Employment Density (sf/job)	**Net Employment Capacity**
Commercial (CB)	136.76	0.4	2,382,819	2,263,678	21,000	121,000	450	4,808

#	Step	Definition/Reason	Method/Assumptions	Data Source	Required Output (where applicable)
26	Net Population Capacity	Use ACS 5-year estimates to find housing occupancy data (pull the existing vacancy and season/vacation rate) and people per household data. A portion of new homes may not be occupied year-round due to vacation and seasonal-uses. These homes should not be used as population capacity.	1. Multiply Net Residential Capacity by jurisdiction-specific vacancy rate. 2. Apply the season/vacation home rate to get total occupied units. 3. Multiply Total Occupied Units by jurisdiction-specific persons per household to get Net Population Capacity.	ACS data and local analysis.	- Vacancy Rate - Seasonal/vacation home rate - Average person per household - Net Population Capacity for the study area.
	EXAMPLE TABLE				

Net Residential Capacity	Vacancy Rate	Seasonal/ Vacation home rate	Average person per household	**Net Population Capacity**
5,572	4.3%	9.6%	3.11	**14,992**

#	Step	Definition/Reason	Method/Assumptions	Data Source	Required Output (where applicable)
27	Compare Capacity to Allocated growth	Calculate the projected surplus or deficit for housing, population, and employment.	Compare the following to the jurisdiction-specific allocations: - Net Population Capacity, - Total Employment Capacity, and - Net Residential Capacity results	Local analysis and growth targets.	- Projected surplus or deficit for housing, population, and employment.
	Other State required findings				
	Capacity by Affordability	New HB 1220 legislation requires jurisdictions to split residential capacity by affordability.	Use HB 1220 Housing Element Guidance Book 2 to calculate the residential capacity for each income level (Chapter 3 Land Capacity Analysis). Summarize this data in a table and compare to the allocated growth targets. If there is a deficit in any income level, use Commerce Guidance (linked above) to resolve the gap as part of your comprehensive plan update.	Local analysis, State regulations, and Commerce guidance.	https://deptofcommerce.app.box.com/s/1d9d5l7g509r389f0mjpowh8isjpirlh
	Optional Studies for more Capacity				
	Middle Housing	**Middle housing legislation and additional capacity for affordable units.** With the next periodic update, jurisdictions required to implement middle housing with HB 1110 (2023) must allow increased development potential if some of the units are affordable. Although generally middle housing will not support households earning under 80% of AMI, in these specific circumstances that assumption would not remain true.	From Commerce guidance: Jurisdictions may want to consider using the following approach - drawn from the Puget Sound Regional Council's (PSRC) impact analysis of HB 1110 - to help determine the capacity impacts of this bill. When considering additional density because of middle housing regulation changes, consider: 1. Which lots would be potentially redevelopable (i.e., those without Homeowners Association (HOA) restrictions, those that are vacant or have only one dwelling unit, those with a developable area over 2,000 square feet, etc.). 2. Of the lots in Step 1, determine which subset of lots may	Local analysis, State regulations, and Commerce guidance.	

#	Step	Definition/Reason	Method/Assumptions	Data Source	Required Output (where applicable)
			economically make sense to redevelop. A starting point for this analysis could be where the land value is greater than the improvement value and the built square footage is less than 1,400 square feet. 3. Estimate the total development potential of lots selected through Step 2, i.e., the maximum number of dwelling units allowed to be developed on these lots net of existing units. Then determine what percentage of the total development potential (or net maximum dwelling units) could reasonably be expected to redevelop over the 20-year planning period. A conservative estimate could be 25%, but tailor this factor to what is most appropriate for your jurisdiction and local market conditions.		
	ADUs	Changes to the housing element requirements in 2021 call for jurisdictions to consider the role of accessory dwelling units (ADUs) in meeting housing needs. Changes in 2023 require jurisdictions to allow up to two ADUs per lot in urban growth areas, with the option for separate sale. Although capacity for ADUs has not typically been measured in a land capacity analysis, they are very likely to become important in meeting housing needs.	Use the optional methodology outlined in Chapter 1.6 of the Commerce HB 1220 Housing Element Guidance Book 2 to calculate ADU capacity by zone.	Local analysis, State regulations, and Commerce guidance.	https://deptofcommerce.app.box.com/s/1d9d5l7g509r389f0mjpowh8isjpirlh