



Island County Planning and Community Development

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1. 2045 Population Projections

RCW 36.70A.115 requires counties and cities to ensure that “Comprehensive plans and development regulations provide sufficient capacity of land suitable for development within their jurisdictions to accommodate their allocated housing and employment growth.” Jurisdictions comply with this requirement by completing a land capacity analysis.

Island County is not subject to the Buildable Lands Program (RCW 36.70A.215) under the Growth Management Act (GMA); instead, the Countywide Planning Policies (CPPs) direct the land capacity analyses of the municipalities and the county to ensure consistency. A land capacity analysis is a necessary step in comprehensive planning as it quantifies the housing units, population, and employment growth that can be accommodated within urban and rural lands under existing development regulations. The countywide land capacity methodology described in the CPPs (C-08-24, PLG-003-24), see APPENDIX C, establishes an overall framework to promote consistency in the calculation of growth capacity.

The way counties and cities are required to plan for growth changed significantly with the adoption of House Bill (HB) 1220 by the Washington Legislature in 2021. Under HB 1220, jurisdictions are required to evaluate whether they have sufficient land capacity to allow for the types and amount of new housing needed to meet identified housing needs at all income levels. If there is insufficient capacity for any type of housing need, the jurisdiction must identify and implement zoning changes and land use allowances that provide enough capacity prior to adoption of the comprehensive plan. The new capacity created must align with the allocated housing targets, discussed further in Section 7.

The GMA states that jurisdictions must adopt and implement any necessary changes to achieve the land capacity necessary to accommodate all housing needs by their comprehensive plan periodic update deadline. This report is the first step in that process, outlining the capacity and deficits within the County, so that amendments to the comprehensive plan provide capacity for all housing needs.

2. 2045 Population Projections

The selection of a population projection is a critical step in the development of a GMA compliant comprehensive plan. At the beginning stage of updating a comprehensive plan, counties are required to utilize the official population projections issued by the Washington State Office of Financial Management (OFM) to decide on a population projection for the planning period. These projections include three distinct ranges: a low, medium, and high

projection. In accordance with RCW 43.62.035, the medium range represents OFM's most likely estimate of a county's population. Counties must select a population projection that falls within these ranges to determine their fundamental GMA planning decisions, specifically within the land use and housing elements.

Table 1. OFM's Population Projections for Island County

Island County	Census 2020	Projections					
		2025	2030	2035	2040	2045	2050
Low		82,941	83,081	83,221	83,361	83,501	83,579
Medium	86,857	90,153	93,670	96,903	99,870	102,639	105,250
High		97,365	102,564	107,455	112,060	116,450	120,670

2.1 Process and Methodology for Population Projections

The Countywide Planning Group (CPG) comprised of representatives from Island County, City of Langley, City of Oak Harbor, Town of Coupeville, and Naval Air Station Whidbey Island (NASWI), met and determined that the previous comprehensive plan underestimated the population growth. In 2023, many of the jurisdictions had exceeded the population projections from the last comprehensive plan estimated for the year 2036 (shown in Table 2). The CPG analyzed the projections provided by OFM and determined that the medium series projection was the most accurate estimate for the 20 year planning period (C-85-23). The medium series projection was adjusted to 99,202 due to infrastructure constraints.

Table 2. Previous Comprehensive Plan's Jurisdictional Allocations and Population Growth

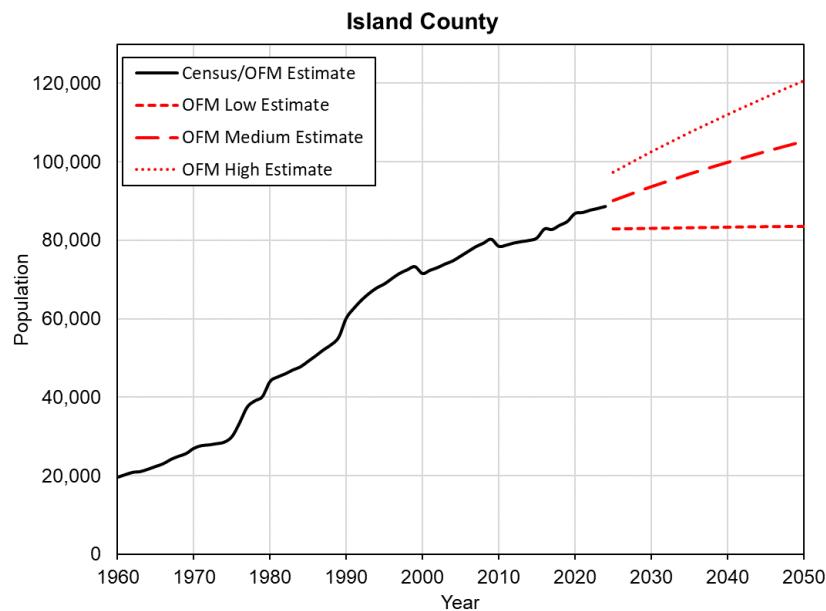
Jurisdiction	2036 Allocation	2010 Population	2020 Population
Oak Harbor	3,747	22,075	24,622
Coupeville	143	1,831	1,942
Langley	92	1,035	1,147
Island County	4,318	78,506	86,857

2.1.1 Analysis and Findings

To comply with the GMA requirements and calculate a population projection, Island County reviewed the County demographic characteristics, economic conditions, and past growth trends, as well as data from the State of Washington and the U.S. Census Bureau. Based on this research, the County arrived at the following conclusions:

- In the year 2045, Island County is projected to have a population of 99,202. The 2020 census determined that Island County had a population of 86,857; this represents a total projected increase of 12,345 people over a 25 year period.
- The median age of Island County is higher than the state as a whole and is increasing at a faster rate.
- Island County's 1998 and 2005 comprehensive plan population projections significantly overestimated future population growth, while the 2016 population projection significantly underestimated future population growth.
- NASWI indicates that at the time of this report, there are no plans to add additional personnel in the next 20 year period.

Figure 1. Graph of OFM Population Projections



3. Jurisdictional Allocations

The changes in housing allocations mandated by HB 1220, prompted Island County's Countywide Planning Group (CPG) to revisit how housing is allocated in the CPPs and develop a new process for allocating housing to jurisdictions that meets the requirements in RCW 36.70A.

Utilizing Method A in the Housing for All Projection Tool (HAPT), shown in the CPPs (APPENDIX C), that was distributed by the Washington Department of Commerce, the projected population increase was distributed between the municipalities and

unincorporated Island County. More information regarding the Housing Allocation Methodology can be found in the CPPs, see APPENDIX C.

Table 3. Jurisdictional Allocations

Jurisdiction	Allocation	Allocation (People)	Allocation (Houses)
Oak Harbor	55.63%	6,868	3,992
Coupeville	4.88%	602	350
Langley	6.22%	768	446
Unincorporated Island County	33.27%	4,107	2,388

Table 4. Population Changes by Jurisdiction Over the Twenty Year Planning Period

Jurisdiction	2020 Population	2045 Population
Oak Harbor	24,622	34,639
Coupeville	1,942	2,577
Langley	1,147	1,955
Unincorporated Island County	59,146	63,468

Table 5. Population Distribution by Jurisdiction, Estimates, and Projection

Jurisdiction	2000	2010	2020	2045 Projection
Oak Harbor	20,060	22,075	24,622	31,490
Coupeville	1,723	1,831	1,942	2,544
Langley	959	1,035	1,147	1,915
Unincorporated Island County	49,081	53,565	59,146	63,253
Total	71,558	78,506	86,857	99,202
Growth	11,363	6,948	8,351	12,345
Growth Rate	18.8%	9.7%	10.6%	14.2%

Population growth was determined by the 2020 Census numbers and used for housing allocations in the HAPT tool. Commerce used an average household size of 2.33 for the entire county in HAPT; however, the individual municipalities have higher or lower household sizes. Therefore, there will be a discrepancy between the total 2045 population as reported in the HAPT tool, and populations reported by jurisdictions in their capacity analyses.

Table 6. Jurisdictional Housing Stock Change

Jurisdiction	2020 Housing Stock	2045 Housing Stock
Oak Harbor	10,057	14,049
Coupeville	1,017	1,367
Langley	743	1,189

Unincorporated Island County	25,445	27,833
Total	37,262	

4. Employment Projections

Island County obtained data from the Washington State Employment Security Department (ESD) to develop a baseline 2045 employment estimate. ESD only reports jobs that are covered by unemployment. This excludes some categories such as those who are self-employed by a non-incorporated company, corporate officers, church employees, elected officials, railroad workers, and uniformed military.

To estimate the number of uncovered jobs, Island County gathered data from the ESD Labor Area Summaries, the Census, and NASWI staff. The 2022 total Island County employment estimated is 28,440 jobs.

Island County forecasted the 2045 total employment level based on the calculation of a population to employment ratio (PER) and the assumption that the County's PER will continue to track closely with the State's PER from 2022–2045. Based on an analysis of past trends, it is assumed that the distribution of jobs across sectors will not significantly change from 2022–2045.

- The 2022 PER for the County was generated using the April 1, 2022, OFM estimate and ESD 2022 data for the total County employment estimate.
- Both the 2022 PER and a 2045 PER for Washington State was generated using OFM's Forecast of Washington Labor Force, 2022 and April 1st Population Estimates. The change in the State's PER between 2022 and 2045 was calculated to be 0.072.
- The same rate of change (2022 – 2045) in the PER for the state was applied to the 2022 County PER, yielding a 2045 PER for the County. This PER ratio is 5.04.
- The Island County 2045 PER was applied to the population forecast to yield a total employment forecast for 2045. Because military jobs are not assumed to grow during this planning period, the PER was not applied to military employment.
- The total 2036 forecast for non-military jobs is 20,348, derived by dividing the 2036 PER ratio by the County's total 2036 population forecast. This equals an increase of 2,708 jobs over the 20 year planning period.

Naval Air Station Whidbey Island (NASWI) employment was treated differently, as it is not dependent on the local economy, but rather, is determined by U.S. Navy staffing decisions. The NASWI representative at CPG meetings stated that there will not be a significant increase of uniformed personnel within this 20 year planning period.

Methodology on how employment capacity was calculated for commercial and industrial areas within Mixed Use Limited Areas of More Intense Rural Development (LAMIRDs) and UGAs can be found in the CPPs, see APPENDIX C.

The results of the employment projection can be summarized as follows:

- The baseline employment estimate for Island County in 2022 is 28,440 jobs and the forecast is 31,148 jobs in 2045. This represents a growth of 2,708 jobs.

4.1. Employment Allocations by Jurisdiction

Utilizing 2021 Census “On the Map” data, percentage shares for each jurisdiction were derived based on current employment density, and then increased slightly to shift weight away from rural areas to UGAs to be consistent with the housing methodology.

Table 7. Jurisdictional Employment Allocations

Jurisdiction	2022 Jobs Total	% Share	Urban Rural Split		Est. 2045 Total
			Urban (City Limits & NMUGA)	Rural (UGA or County)	
Oak Harbor					
Military*	10,800	0%	0	0	10,800
Non-Military	6,233	54.5%	1,225	251	7,709
Coupeville	2,484	15.0%	406	0	2,891
Langley	587	5.0%	135	0	722
Unincorporated Island County	8,335	25.5%	69	622	9,026
Totals	28,440		1,835	873	31,148

*Military current jobs of 10,800 includes 8,700 active duty and 2,100 civilians at NASWI.

4.2. Employment Assumptions:

- Oak Harbor Urban/Rural Split was 83% to 17%. Due to the size of Langley’s UGA and absence of a UGA in Coupeville, no urban split was applied for those two municipalities.
- The Freeland Non-Municipal Urban Growth Area (NMUGA) received 10% of Island County’s share and is placed under the “Urban” split.
- Military growth is not included in the employment shares split and will not be increasing during this planning period.

4.3. Mixed Use LAMIRD & UGA Employment Capacity:

Table 8 presents the future employment land capacity analysis in UGAs and Mixed Use LAMIRDs, including the land supply available for future commercial and industrial development and the associated employment capacity of those lands.

Table 8. Employment Capacity in Mixed Use LAMIRDs and UGAs

Area	Acres	Employment Capacity	Employment Reserve
Oak Harbor UGA	202	687	436

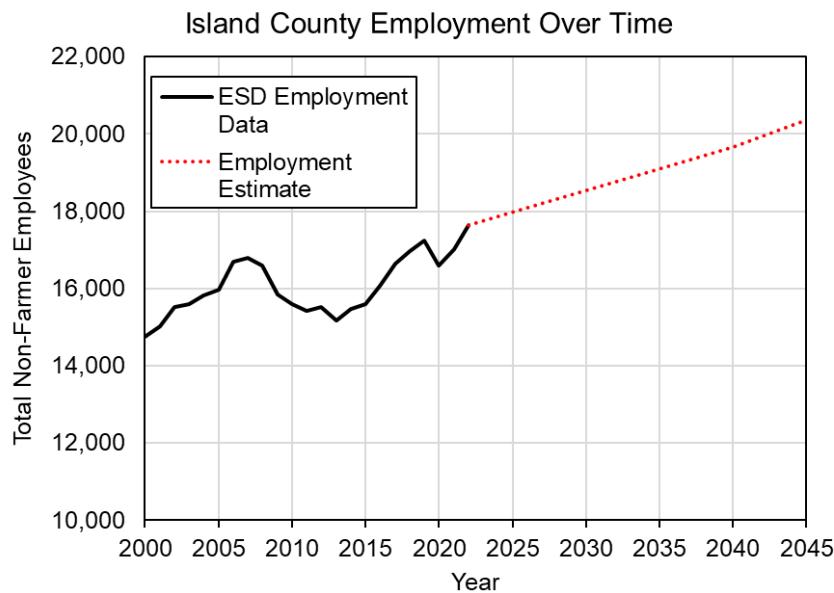
Freeland NMUGA	124	753	684
Mixed Use LAMIRDs	97	1,643	1,021
Langley UGA	0	0	0

- Oak Harbor UGA, Freeland NMUGA, and the Mixed Use LAMIRDs all have excess employment capacity.
- Each municipality analyzed their respective employment capacity separately, which can be found in their Land Capacity Analyses in the Appendix.
- The Langley UGA does not have any land available for commercial or industrial uses, therefore there is no employment capacity.

4.4. Employment Growth Over Time

The number of employed persons in Island County grew 1.13% from 15,520 in 2012 to 17,640 in 2022. This growth percentage was a slight increase from the 2000 to 2010 decade, where the yearly growth averaged 1.05%.

Figure 2. Island County Employment Estimates



5. Land Capacity Analysis

As part of the 2025 Comprehensive Plan update, Island County has completed a Land Capacity Analysis to estimate the amount of land available for development in Island

County. The analysis evaluated current land use patterns and the amount of land which could be subdivided, developed, or redeveloped.

5.1. Methodology

A step-by-step methodology of the Land Capacity Analysis can be found in the CPPs, APPENDIX C.

5.1.1. Glossary:

1. **Accessory dwelling units (ADUs):** ADUs are separate living quarters either contained within the primary residence (attached ADUs), or a detached dwelling unit situated on the same parcel as a primary residence that shares a common access point as the primary residence.
2. **Critical Areas:** Mapped and verified streams, wetlands, lakes, ponds, frequently flooded areas, steep slopes, and geologically hazardous areas, and their maximum associated buffers.
2. **Critical Area Constraint Factor:** A number representing the percentage of land (specific to each area analyzed) which is presumed to be constrained by critical areas, and therefore less likely to be available for development.
3. **Development Potential, Non-Residential & Multi-Family Residential:** The number of acres available for non-residential and multi-family residential development in each industrial, commercial, mixed use, and multi-family zone. In this analysis, development potential is used as a subtotal to express the gross capacity of vacant or re-developable parcels before the total development potential is calculated.
4. **Development Potential, Single-Family Residential:** The potential number of lots or dwelling units which can be created by dividing or developing vacant or partially vacant parcels in zones which permit single-family residential development. In this analysis, development potential is used as a subtotal to express the gross capacity of vacant or partially vacant parcels before the total development potential is calculated.
5. **Low Probability for Development:** Parcels which are not likely to be available for development because they are owned by a charitable organization, institution, or governmental entity. Low probability development parcels shall be identified based on Assessor's parcel data. Parcels which are tax exempt based on Assessor's parcel data shall be considered low probability development parcels. Parcels with an easement that restricts future development shall also be considered low probability development parcels.
6. **Partially Vacant Parcel:** A partially vacant parcel is a parcel which contains an existing dwelling unit but which is large enough to be divided.
7. **Public Purpose Land:** Includes land required for such things as streets, drainage facilities, and parks/open space.

8. **Re-Developable Parcel:** A parcel zoned for non-residential uses or multi-family residential uses that has the potential to be redeveloped and used more intensively.
9. **Total Development Potential, Non-Residential & Multi-Family Residential:** The total gross quantity of land available for multi-family or non-residential development before land is subtracted to account for public purposes and critical areas.
10. **Total Development Potential, Single-Family Residential:** The total gross number of lots or dwelling units which could be created by dividing and/or developing all vacant and partially vacant parcels available for single-family development before land is subtracted to account for public purposes and critical areas.
11. **Total Net Capacity:** The total net capacity of each single-family, multi-family, industrial, commercial, and mixed use zone after land is subtracted for public purposes and critical areas. Total net capacity is expressed in acres for multi-family and non-residential zones, and dwelling units or lots for single-family zones.
12. **Vacant Parcel:** A parcel which is either vacant or has an improved value of less than \$4,000 based on Assessor's parcel data. Parcels which contain a mobile or manufacture home shall not be considered vacant even if they have an improved value of less than \$4,000.
13. When the term **value** is used in this document it shall mean the assessed value identified in the Island County Assessor's database.
14. When the term **BOCC** is used in this document it shall mean the Board of Island County Commissioners.

5.1.2. Assumptions:

Please see APPENDIX C for assumptions outlined in the CPPs.

5.1.2.1. Sewer Assumptions

The densities stated within the Island County Code for the Freeland NMUGA, Langley UGA, and Oak Harbor UGA assume that these areas will be served by sewer. The numbers shown in this report are therefore subject to change if sewer is or is not served within those areas.

5.1.2.2. ADUs in Rural Areas Assumptions

RCW 36.70A.070(2)(d)(iv) states that the role of ADUs in meeting housing needs must be considered in the housing element of the comprehensive plan. The Department of Commerce has stated that ADUs may be utilized as affordable housing options for the 50% to 120%+ Area Median Income (AMI) levels. Island County Code (ICC) states that only 35 detached accessory dwelling units (DADUs) are allowed to be built each year (ICC 17.03.180.l), with no limit to attached ADUs. To determine the number of potential ADUs that may be built over

the next twenty years, the average number of ADUs (detached and attached) was determined using data provided by the Island County Building Department (

APPENDIX **B**

ADU PERMIT DATA

Table 19). The average of 40 ADUs (detached and attached) per year, resulted in a total of 800 ADUs over the twenty year planning period.

5.1.2.3. ADUs in Urban Growth Areas Assumptions

The Oak Harbor UGA, Langley UGA, and Freeland NMUGA are not subject to the DADU limit that is imposed in the rural areas. Following the adoption of House Bill 1337 in 2023, cities and counties must allow at least two ADUs on all lots that allow for single family residences within an urban growth area. The Department of Commerce guidance suggests that ADUs in UGAs can represent 1% to 10% of the housing supply. Island County applied 10% for the Freeland NMUGA, Langley UGA, and Oak Harbor UGA to represent ADU growth. The number of parcels under the assessor's single family code was multiplied by 10% and then to account for allowing for at least two ADUs per parcel as described above from HB 1337, that number was multiplied by two. The results can be found in Table 9 below.

Table 9. ADU Capacity

Area	Lots that could accommodate ADUs	Estimated Number of ADUs Anticipated During Planning Period
Rural Lands	34,927	800
Oak Harbor UGA	818	160
Freeland NMUGA	216	42
Langley UGA	4	0

Commented [EC1]: Update for annexation area?

6. Findings

- Unincorporated Island County currently has an estimated 28,568 dwelling units, with the majority of these units located in the Rural zone.
- The Rural Residential LAMIRDs hold the next largest density of dwellings in the unincorporated areas.
- Under current zoning regulations, the Oak Harbor UGA has a deficit in land necessary to meet the projected population growth.
- With a net capacity of 7,971 dwelling units, Island County has enough aggregate land to accommodate the 2,388 units allocated, before the income analysis was applied.
- Known septic constraints and available water connections will limit capacities in some areas.
- An average of 21.99% of unincorporated Island County lands are encumbered by critical areas.

Table 10. Existing Conditions

Zoning District	Acres	Number of Parcels [†]	Current Dwelling Units
Rural	65,088	16,132	12,452
Rural Forest	13,045	227	103
Rural Ag	6,504	131	89
Commercial Ag	4,391	49	27
Rural Residential LAMIRDs	9,611	13,523	10,321
Mixed Use LAMIRDs	409	330	137
Oak Harbor UGA	1,089	947	901
Freeland UGA	451	452	412
Camano Rural	14,680	5,309	4,112
Airport	287	58	14
Langley UGA	38	4	4
Totals	115,594	37,162	28,572

[†] Parcel count is after removing government and publicly owned lands

The following land capacity analysis results were calculated in three steps outlined below, with the net density numbers being the final density used in all further steps:

- Gross Density: a density calculation based upon the number of units constructed across the entire county, without deductions.
- Buildable Density: a density calculation that removes critical areas and buffers to better determine the density of construction over the buildable area.
- Net Density: a density calculation that removes critical areas and buffers, adjustment factors, as well as roads, utilities, and other areas not explicitly used for residential units.

Table 11. Gross Density

Zoning District	Acres	Number of Parcels [†]	Gross Dwelling Units
Rural	65,088	16,132	4,884
Rural Forest	13,045	227	132
Rural Ag	6,504	131	48
Commercial Ag	4,391	49	10
Rural Residential LAMIRDs	9,611	13,523	4,999
Mixed Use LAMIRDs	409	330	162
Oak Harbor UGA	1,089	947	120*
Freeland UGA	451	452	826*
Camano	14,680	5,309	1,328
Airport	287	58	52
Langley UGA	38	4	17
Totals	115,594	37,162	12,578

[†] Parcel count is after removing government and publicly owned lands

*Densities assume sewer service and are likely not achievable on septic.

Table 12. Buildable Density

Zoning District	Acres	Critical Areas Percent [†]	Buildable Dwelling Units
Rural	65,088	15.05%	4,117
Rural Forest	13,045	12.57%	115
Rural Ag	6,504	14.06%	41
Commercial Ag	4,391	88.88%	21
Rural Residential LAMIRDs	9,611	19.52%	3,947
Mixed Use LAMIRDs	409	9.41%	146
Oak Harbor UGA	1,089	7.63%	106*
Freeland UGA	451	10.78%	731*
Camano	14,680	13.94%	1,161
Airport	287	0.017%	51
Langley UGA	38	50.00%	8
Totals	115,594	21.99%	10,444

*Densities assume sewer service and are likely not achievable on septic.

†Critical areas percent was averaged across the zoning district.

Table 13. Net Density

Zoning District	Parcels*	Potentially Developable Parcels	Net Dwelling Units (Future Capacity)
Rural	16,589	4,356	2,907 + 800 ADUs
Rural Forest	227	102	83
Rural Ag	125	40	27
Commercial Ag	49	9	16
Rural Residential LAMIRDs	13,130	3,364	2,366
Mixed Use LAMIRDs	330	228	198
Oak Harbor UGA*	921	106	45 + 160 ADUs*
Freeland UGA*	455	162	406 + 42 ADUs*
Camano	5,309	1,187	820
Airport	58	26	34
Langley UGA	4	2	5*†
Totals	37,135	9,614	7,909

*Densities assume sewer service and are likely not achievable on septic.

†This number does not take into consideration the assigned sewer connections.

7. Area Median Income (AMI) Capacity Analysis

7.1. Background

Counties and Cities are now required to conduct an inventory and analysis of all housing needs by income, and for permanent supportive housing and emergency housing; and identify sufficient capacity of land for identified housing needs.

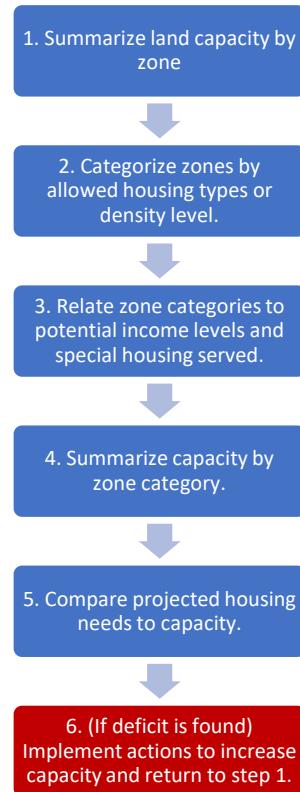
RCW 36.70A.070(2)(c) states that the land capacity analysis needs to identify “sufficient capacity of land for housing including, but not limited to, government-assisted housing, housing for moderate, low, very low, and extremely low-income households, manufactured housing, multifamily housing, group homes, foster care facilities, emergency housing, emergency shelters, permanent supportive housing, and within an urban growth area boundary, consideration of duplexes, triplexes, and townhomes.”

7.2. AMI Methodology

The goal of evaluating capacity by AMI level is to show quantitatively whether the jurisdiction has enough capacity to meet its allocated housing needs at each income level. If, at the conclusion of this analysis, there is a deficit of capacity at any income level, the jurisdiction must identify actions that increase capacity. Once effective steps or actions

are put into place, the jurisdiction must return to the beginning of the AMI analysis to recalculate capacity and compare needs. The Department of Commerce requires a different analysis for Emergency Housing.

Figure 3. Flowchart of AMI Analysis Methodology



1. *Summarize land capacity by zone.* See
- 2.
- 3.

4. Table 13 for net densities by zone.
5. *Classify zones by allowed housing types and densities.* The zoning code for each zoning district (e.g., Rural, Rural Forest, Residential LAMIRDs, etc.) was analyzed to determine what housing types are currently allowed and the maximum density allowed. In some areas where different densities are allowed, such as Residential LAMIRDs, Mixed Use LAMIRDs, and the Freeland NMUGA, the average density was utilized.

Table 14. Land Uses by Density Allowed

Zoning	Housing Types Allowed	Max Density Allowed (dwelling units)	Assigned Zone Category
Rural	Single family, ADU, group home, manufactured home park	1 du per 5 acres	Low Density
Rural Forest	Single family, ADU, group home, manufactured home park	1 du per 10 acres	Low Density
Rural Ag	Single family, ADU, group home, farm worker housing	1 du per 10 acres	Low Density
Rural Residential LAMIRDs	Single family, ADU, duplex, tri plex, four plex, group home	1.8 du per acre	Low Density, Moderate Density
Mixed Use LAMIRDs	Mixed use, multifamily, group home	2.25 du per acre	Moderate Density, Multifamily
Freeland UGA	Single family, ADU, cottage housing, group home, mixed Use, multi family, ADU	4.6 du per acre	Multifamily

Airport	Single family, ADU	2 du per acre	Low Density
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6. *Relate zone categories to potential income levels and PSH/emergency housing types served.* The zoning districts were then assigned a zone category based on the type of housing that is currently allowed in that zone. The zone categories were assigned an assumed affordability based on the maximum density allowed and housing types allowed.

Table 15. Zone Category by Income Level

Zone Category	Housing Types Allowed	Assumed Affordability
Low Density	Single family	100-120%+
Moderate Density	Townhouses, duplex, triplex, four plex, planned residential developments	80-120%
Accessory Dwelling Units (ADUs)	2-4 dwelling units per lot	50-120%
Multifamily	Apartments, condos, group homes, manufactured home parks	0-80%

Summarize capacity by zone category. The zoning districts were then grouped based on the zone category. Using the net densities (found in

7. Table 13), the zone capacity for each zone category was determined.

Table 16. Capacities by Zoning Category

Zoning District	Net Density	Zone Category	Capacity in Zone
Rural	3,741	Low Density	3,853
Rural Forest	95		
Rural Ag	28		
Commercial Ag	16		
Mixed Use LAMIRDs	198	Moderate Density, Multifamily	198
Freeland	406	Low Density, Moderate Density, Multifamily	406
ADUs	1,002	Low Density, Moderate Density	1,002
Rural Residential LAMIRDs	2,366	Low Density, Moderate Density	2,366
Airport	34	Low Density, Moderate Density	34
Oak Harbor UGA	46	Low Density, Moderate Density, Multifamily	45

8. *Compare projected housing needs to capacity.*

- Referencing the HAPT tool, the projected need for unincorporated Island County was tabulated by income level bracket.

b. The HAPT tool states the percentage of the housing stock that each income level should encompass (shown in Table 17). This information was used to determine the percentage of each zoning district within the zone categories will be utilized for each income level. For example, 13% of the total net density in Mixed Use LAMIRDs should accommodate the 50-80% income level.

Table 17. Distribution of Units by Income Level, from HAPT Tool

Income Bracket	0-30%	30-50%	50-80%	80-100%	100-120%	120%+
Distribution of Units	4%	7%	13%	14%	14%	47%
Added Dwellings	500	486	414	196	187	604

c. Certain zoning districts can accommodate housing across multiple zone categories (e.g., Mixed Use LAMIRDs, Freeland, and ADUs). To determine the total zone capacity per income level, the zone capacity was multiplied by the percentage shown in Table 17 and then the capacities were summed.

d. The capacity surplus or deficit was determined by subtracting the total zone capacity from the projected need per income level (stated in the HAPT tool, APPENDIX C).

Table 18. Zone Category Capacities by Income Level

Income Levels	Zone Categories	Projected Need	% from HAPT	Total Zone Capacity	Capacity Surplus/Deficit
0-30%	Multifamily	500	4%	26	- 474
30-50%		486	7%	44	- 442
50-80%	Moderate Density	414	13%	212	-202
80-100%		196	14%	565	369
100-120%	Low Density	187	14%	2,225	2,038
120%+		604	47%	4,833	4,229

Note: Oak Harbor UGA was removed from this analysis and will be analyzed separately.

7.3. Findings

- There are significant deficits in the 0-30% and 30-50% and 50-80% AMI capacities.
- The deficits in the 0-80% AMI housing numbers were an anticipated outcome of the land capacity analysis, given the new State requirements.
- Island County will have to consider reasonable alternatives to increase the supply of 0-80% AMI housing during this planning period within the Land Use and Housing Elements.

APPENDIX A
CONSTRAINTS AND ASSUMPTIONS

Discount Factors Applied

Adjustment Factor	Definition from CPPs	Constraint
Critical Areas Constraint	For critical areas, including FEMA floodplains, hazardous slopes, wetlands, and streams, and their buffers, GIS data was collected through the Island County GIS database and appropriate areas were deducted from parcels using GIS software. A critical areas discount factor was developed by comparing acreage before and after GIS analysis per zoning district. This number was then applied to the gross density.	Varies by zone. See percents outlined in Table 12.
Land for Public Purposes	In LAMIRDs and UGAs, 15% of available land will be needed for public purposes.	15%
Seasonal/Recreational Dwellings	Some dwelling units will not be available for residential occupancy, as they are used for short term rentals (e.g., VRBOs), second homes, etc. A seasonal/recreational factor will be based on the most current census data but may be refined using local data.	11.1% Calculated from Census Table H1 .
Vacancy Rate	A reasonable factor for vacant units will be based on the most current census data but may be refined using local data.	4.01% Calculated from adding up vacant, for sale, and for rent units in Census Table H5 .

The CPPs Required Adjustments Specific to Each Zone

Constraint/Adjustment Factor	Applicable Zone(s)	Adjustment %
Vacant Parcels	Rural, Rural Agriculture, Rural Forest, Commercial Agriculture, Airport, Freeland, Residential LAMIRDs, Mixed-Use LAMIRDs, Oak Harbor UGA, Langley UGA	10%
Partially Vacant Parcels	Rural, Rural Agriculture, Rural Forest, Commercial Agriculture, Airport, Freeland, Residential LAMIRDs, Mixed-Use LAMIRDs, Oak Harbor UGA, Langley UGA	Between 0-90% based on lot size.
Re-Development	All Oak Harbor non-residential zones, All Freeland non-residential zones, Mixed-Use LAMIRDs, and Rural zoned parcels that met the re-development criteria in the CPPs	50%

Critical Area Buffers

Type of Critical Area	Buffer	Code Section/Other Notes	Data Source
Streams		17.02B.420	Island County GIS
Type F	100 ft		
All Other Streams	75 ft		
Wetlands	N/A	17.02B.240	Island County GIS
Steep Slopes		11.02.160	Island County GIS
Over 40%	N/A		
Unstable	N/A		
Frequently Flooded Areas		14.02A, 17.05A.090.L	Island County GIS

FEMA Flood Zones

N/A

APPENDIX B
ADU PERMIT DATA

Table 19. ADU and DADU Permits by Year (as of July 30, 2024)

Year	ADU	DADU	Total
2001	No data	25	25
2002	No data	28	28
2003	No data	31	31
2004	No data	35	35
2005	No data	35	35
2006	No data	35	35
2007	No data	35	35
2008	No data	27	27
2009	No data	11	11
2010	No data	21	21
2011	0	19	19
2012	1	12	13
2013	1	11	12
2014	1	18	19
2015	0	15	15
2016	0	29	29
2017	2	26	28
2018	4	31	35
2019	5	35	40
2020	5	35	40
2021	5	35	40
2022	2	35	37
2023	7	35	42
2024	0	29	29
Totals	33	648	681

APPENDIX C
COUNTYWIDE PLANNING POLICIES