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Rural Cluster Analysis

Steve Erickson, on behalf of Whidbey Environmental Action Network, May 20, 2026

Introduction.

The proposed Rural Cluster (RC) development scheme does not fulfill its stated purposes.[1] It will produce impacts to aquatic systems much more severe than what is allowed under "traditional" single lot development. It does not protect critical areas due to failure to address the exemption of non-conversion logging from County critical area protections. It will arguably convert more defacto (informal) open space to development than under single lot development. It will not provide affordable housing in the income brackets that the land capacity analysis identifies as having a housing deficit. And it will drive rural sprawl.

1. Rural Clusters in the Commercial Ag zone are inconsistent with GMA's resource lands conservation mandate.

The Commercial Ag zone comprises the only GMA natural resource lands in Island County. This zone only includes approximately 4119 acres, or ~3.1% of the entire County. The minimum lot size in this zone (20 acres) is already below what most other counties require for resource agricultural land. The

[1] These are set forth in proposed ICC 16.17.010:

> Produce a development consistent with the natural character of rural and resource lands, to prevent rural sprawl, and with non-urban utilities and services;
>
> A. Produce a development, which would be better than traditional lot-by-lot development, on either consolidated lots or unsubdivided property, through variety in design, placement of buildings, and use of open space, in order to capitalize on and preserve the special features of the individual site;
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> C. Permit flexibility that will encourage a more creative approach in the development of land and will result in a more efficient, aesthetic, and desirable use of open space;
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> D. Encourage the development of cluster housing, town houses, and other development concepts compatible with surrounding development and land uses;
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> E. Leave more undisturbed open space and natural vegetation so that more rainwater drains into the soil for groundwater recharge, and there is a reduction in pollution, flooding, erosion, and drainage problems;
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> F. Provide opportunity for affordable housing, transitional housing, and/or permanent supportive housing in a rural setting; and
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> G. Protect rural character by:
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> 1. Containing or otherwise controlling rural development;
> 2. Assuring visual compatibility with the surrounding rural area;
> 3. Reducing the inappropriate conversion of rural zoned lands into large lots;
> 4. Facilitating the protection of critical areas;
> 5. Providing for wildlife and fish and wildlife habitat;
> 6. Preserve significant portions of rural clusters for open space and regional native vegetation; and
> 7. Reducing conflicts from residential uses with lands zoned Rural Agriculture, Rural Forest, or Commercial Agriculture.

Rural Cluster scheme allows direct loss of 35% of these resource lands to development and additional loss due to impacts allowed to the open space, as discussed below. The RC scheme does not comply with GMA's requirement for the conservation of natural resource lands. Finally, while they are arguably grandfathered in, the existing PRD scheme should be completely removed for the Commercial Ag zone.

2. The proposed Rural zone density is not consistent with GMAs requirements.

The density of Rural zoned parcels can be increased to 1 DU/2.5 or 1 DU/2.25 acres using Rural Clusters.[2] Growth Management Hearings Boards have long held that 5 acres is the minimum average lot size that is *rural.* Density of 1 DU/2.5 acres is proposed for Rural Clusters in the Rural zone. Growth Management Hearings Boards have long held that the minimum rural density is 1 DU/5 acres. While GMA provides for innovative techniques including clustering, the overall development density must still be rural. We favor allowing for and possibly requiring clustering; however, the overall density of the subject parcel(s) must still be rural. The RC scheme does not meet this standard.

3. As proposed, the Rural Cluster scheme is inconsistent with purpose of Rural Ag, Rural Forest, Commercial Ag zone.

Over 1/3 of the area of parcels in the affected zones could be converted to dense cluster housing under the RC scheme.[3] The need for sufficient land for operational viability for commercial forestry and agriculture is ignored.[4] As proposed, the Rural Cluster scheme is contrary to the purpose of these zones.[5] Considering the potential siting of infrastructure in the open space and the impact of additional

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[2] The zoning ordinance allows a 10% size variation for 5-acre lots. It is not clear how this provision interacts with the Rural Cluster provisions.

> 17.03.060. B.
> 5. For lots legally created prior to or after effective date of this chapter, variations of ten (10) percent in the five (5) acre lot size may be allowed to account for special site features, unusual topography or similar factors that make strict adherence to minimum lot size impractical. Gross lot area shall include any land area that has been donated for public right-of-way or public open space.

[3] The RC scheme allows 35% of the area of parcels in the Rural Ag, Rural Forest, and Commercial Ag zones to be developed, reducing the land actually available for the zone purpose by that amount. In contrast, individual development of a single parcel in, i.e., Rural Forest can only remove one acre from current use tax status for the developed portion. This effectively allows only 1 acre to be developed with the rest remaining in forest. Since the minimum lot size in the Rural Forest zone is 10 acres, this limits development to no more than 10% of the lot.

[4] For example, one of the rationales in 1998 to not designate any forest land in Island County as GMA resource lands of long term commercial significance was that the blocks of forest land were too small.

[5] ICC 17.03.090. The primary purpose of the Rural Agriculture (RA) Zone is to protect and encourage the long term productive use of Island County's agricultural land resources of local importance. It is established to identify geographic areas where commercial farming practices can be conducted in an efficient and effective manner; and to help maximize the productivity of the lands so classified.

> ICC 17.03.100. The primary purpose of the Commercial Agriculture (CA) Zone is to protect and encourage the long term commercially productive use of Island County's agricultural resource lands of long term

tree removal within 1-1/2 tree heights of any "structure frequented by people," the direct and cumulative loss makes the RC scheme simply inconsistent with the purpose of these zones. See *5. Open Space requirement is inadequate.* below.

Finally, while they are arguably grandfathered in, the existing PRD scheme should be seriously revised for the two large lot rural lands zones (Rural Ag and Rural Forest). The RC scheme could potentially be revised to work in those zones.

4. Hydrological impacts.

The proposed RC scheme has three primary limitations on development physical impact. First, it prioritizes the order in which different natural features area to be designated as open space. This section is excellent. However, the standards for open space and impervious surface are inadequate to protect aquatic system function locally or, depending on how widespread and numerous these and other developments with high impervious surface occur, regionally.

The RC scheme only includes two explicit land use categories: open space and "rural cluster development site area." The RC scheme appears to leave all land not designated as open space available for development. For this reason I interpret "development site area" to include all of the subject parcel that is not designated as open space. The minimum required open space is determined as a proportion of the entire parcel, while the maximum allowed impervious surface is determined as a proportion of the "rural cluster development site area."[6] This wording is somewhat ambiguous. Therefore, determining the proportion of the entire parcel (not just the "development site area") that can be covered by impervious surface can be calculated by two simple equations:

1. Determine the proportion that is the development site area expressed as a percentage of the entire parcel:

Development Site % = Parcel Area % - Open Space %

2. Determine the impervious surface area for the entire parcel expressed as a percentage of the entire parcel:

Impervious Surface Parcel % = Development Site % X Impervious Surface Development Site Area %

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commercial significance that have been designated pursuant to RCW 36.70A.170. It is established to identify geographic areas where a combination of soil, and topography allow commercial farming practices to be conducted in an efficient and effective manner; to help maximize the productivity of the lands so classified; to protect farming operations from interference by non-farmers; and to maintain agricultural land areas for agriculture use free from conflicting non-farm uses. Otherwise, the purposes of the zoning classification are the same as the RA Zone.

ICC 17.03.110. The primary purpose of the Rural Forest (RF) Zone is to protect and encourage the long term productive use of Island County's forest land resources of local significance. It is established to identify geographical areas where commercial forest management practices can be conducted in an efficient manner; and to help maximize the productivity of the land so classified.

[6] **TABLE 16.17.075 – DEVELOPMENT STANDARDS BY ZONING DISTRICT**

Impervious 50% surface ratio shall be the percentage of the gross rural cluster development site area.

The proposed RC scheme requires a minimum open space of 45% in the Rural and 65% in the Rural Ag, Rural Forest, and Commercial Ag zones. Maximum impervious surface is set at 50% of the development site area in the Rural and 45% in the Rural Ag, Rural Forest, and Commercial Ag zones. Tables 1–4 shows the resulting proportion of impervious surface for the entire parcel at these RC scheme limits, as well as figures needed to bring the impervious surface down to the widely recognized 10% threshold as at which clear signs of aquatic system degradation are found.[7]

Table 1. Rural Zone: Maximum impervious surface allowed by proposed RC scheme.

Development Site % =

Parcel Area % - Open Space %

Development Site %	**Parcel Area %**	**Open Space %**
55	100	45

Impervious Surface Parcel % =

Development Site % X Impervious Surface Development Site Area %

Impervious Surface Parcel %	Development Site %	Impervious Surface Development Site Area %
27.5	55	50

Table 2. Rural Zone: Open space and impervious surface combinations that result in parcel impervious surface of 10% or less. Results approximately reducing Parcel Impervious Surface to or below the 10% threshold are shown in bold italics.

Development Site % =

Parcel Area % - Open Space %

Development Site %	**Parcel Area %**	**Open Space %**
50	100	50
40	100	60
30	100	70
20	100	80

Impervious Surface Parcel % =

Development Site % X Impervious Surface Development Site Area %

[7]See, for example:
https://www2.clark.wa.gov/files/dept/community-planning/shoreline-master-program/proposal-comments-received/futurewise-cd-1/info-best-available-science/bas-synthesis-reports/king-county/bas-volume-ii/assessment_ch_4_stormwater.pdf

EXECUTIVE REPORT – BEST AVAILABLE SCIENCE Volume II, ASSESSMENT – FEBRUARY 2004
Chapter 4 – Assessment of Stormwater, and Clearing and Grading Ordinances King County
4 – 8
The use of 10 percent impervious surface as a threshold for estimating adverse impacts within watersheds and their basins represents the latest research findings on threshold values above which wetland (Reinelt et al. 1993; Arnold and Gibbons 1996), and aquatic areas (see Aquatic Areas Assessment above) protection declines. Therefore attempting to maintain 10 percent or less impervious surface represents BAS. Thresholds are controversial in that they are based on general relationships derived from complex watershed conditions and interactions. They are perfected as additional research findings become available. *Nevertheless, scientific studies evaluating wetland and stream health using physiochemical and biological criteria are remarkably consistent in finding deterioration at relatively low impervious surface area, which is between 10 and 20 percent.* (Italics added for emphasis.)

Impervious Surface Parcel %	Development Site %	Impervious Surface Development Site Area %	Open Space %
20	50	40	50
15	50	30	50
10	***50***	***20***	***50***
16	40	40	60
12	40	30	60
10	***40***	***25***	***60***
12	30	40	70
9	**30**	**30**	**70**
12	20	60	80
10	***20***	***50***	***80***

Table 3. Rural Ag, Rural Forest, and Commercial Ag Zones. Maximum impervious surface allowed by proposed RC scheme.

Development Site % =

Parcel Area % - Open Space %

Development Site %	**Parcel Area %**	**Open Space %**
35	100	65

Impervious Surface Parcel % =

Development Site % X Impervious Surface Development Site Area %

Impervious Surface Parcel %	**Development Site %**	**Impervious Surface Development Site Area %**
15.75	35	45

Table 4. Rural Ag, Rural Forest, and Commercial Ag Zones. Open space and impervious surface combinations that result in parcel impervious surface of 10% or less. Results approximately reducing Parcel Impervious Surface to or below the 10% threshold are shown in bold italics.

Development Site % =

Parcel Area % - Open Space %

Development Site %	**Parcel Area %**	**Open Space %**
35	100	65
30	100	70
20	100	80
10	100	90

Impervious Surface Parcel % =

Development Site % X Impervious Surface Development Site Area %

Impervious Surface Parcel %	**Development Site %**	**Impervious Surface Development Site Area %**	**Open Space %**
12.25	35	35	65
9.8	**35**	**28**	**65**
14	30	40	70
10	**30**	**33.5**	**70**

12	20	60	80
10	**20**	**50**	**80**
10	**10**	**100**	**90**

As shown in the above tables, the minimum open space and maximum impervious surface limits must be increased and decreased significantly for the RC scheme in the Rural zone to avoid or (at least) seriously reduce aquatic system impacts. The needed adjustment is substantially less for the Rural Ag, Rural Forest, and Commercial Ag zones.

5. Open Space requirement is inadequate.

Besides the potential local and regionally cumulative hydrological impacts to aquatic systems, the RC scheme is misleading in terms of how much open space is minimally provided. It will always be advantageous for developers to site the infrastructure in the open space as much as possible to allow the RC developed area to more closely resemble standard individual lots.

Up to 25% of the "development site area" may be developed as "community area, including for infrastructure and "recreational purposes;" this infrastructure can then be located in the open space.[8] [9] Here is the basic math for a 20 acre Rural zone RC:

Development Site Area = Parcel Area % - Open Space % = 20 acres - 9 acres = 11 acres

Community Area = Development Site Area X 25% = 11 acres X 25% = 2.75 acres

Unencumbered Open Space = Open Space - Community Area = 9 acres – 2.75 acres = 6.25 acres

6.25 acres = 31.25% of 20 acres

In this way, the actual effective open space in Rural zone RCs can be reduced from 45% of the entire parcel to 32.5%. For Rural Ag, Rural Forest, and Commercial Ag RCs the open space reduction is from 65% to 56.25%.

The infrastructure typically sited in the open space includes:

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[8]Note that this also places the infrastructure closer to, i.e., critical areas.

[9]. Footnotes for Table 16.17.075.

> ….
>
> 4. A portion of any required open space area, not to exceed twenty-five (25) percent of the total rural cluster development site area may be designated community area.
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> 5. Community area may be used for well sites, drain fields, or recreational purposes. The uses authorized for the community areas must be appropriate to the scale and character of the planned residential development considering its location, size, density, expected population, topography, and the number and type of dwellings to be provided.

• well and wellhouse with the required 100 foot radius buffer and access road
• engineered stormwater system, potentially including detention pond and access road (possibly necessary due to the high level of allowed impervious surface)
• community septic tank, drainfield, and reserve area

Additionally, structures such as club houses and their supporting infrastructure may also be sited in the open space.

The area likely required by this infrastructure is summarized here and compared to the minimum 9 acres of open space for a Rural zoned 20 acre RC.

• The 100 foot radius well buffer is ~.72 acres.
• A minimum lot size of 1/3 acre is required for an individual septic system and drainfield.[10] I assume that a community drain field with additional area required for the reserve area, access road, etc. would be comparable. For 8 DUs this would be ~2.7 acres. Even if it were only 2/3 of this, that would be 1.8 acres.
• It is difficult to model a standard area for stormwater detention, since this is dependent on site specific conditions, including, soils, slopes, etc. However, the high impervious surface allowed suggests that some engineered facilities would be necessary, particularly to avoid degradation of local aquatic systems by alteration of their hydroperiods. The impacts on aquatic systems of the Rural Cluster scheme do not appear to have been considered.
• Similarly, developed recreation structures are impossible to model.
• The Dept. of Natural Resources considers every tree within 1-1/2 tree heights of a "structure frequented by people" as exempt from any regulation regarding tree removal. Neither does Island County have any regulations or policies (as far as I am aware) specifically addressing this exemption outside of critical areas. DNR considers "1-1/2 tree heights" in Island County to range from 150-225 feet.

If only the infrastructure listed above with reasonably firm numbers is used, a 20 acre Rural zone RC will virtually always have the open space reduced from 9 to 6.25 acres, or 45% to 31.25%.

In some instances, the infrastructure may not interfere with agricultural or recreational use; pasture or hayfield is an example. In others, it will certainly interfere; examples include the well buffer and drainfield as far as grazing or tillage agriculture, or almost any of these uses as far as forest is concerned. Practically speaking, this means that the minimum fully functioning open space for a Rural zoned RC is actually 31.25%.

Finally, there is one other problem regarding the open space requirement. It is not clear if after the minimum open space standard is met additional area must be designated in order to fulfill the prioritization list. There does not appear to be an explicit requirement for this. This needs to be clarified to assure that all necessary *and desirable* areas are included.

6. Critical Area protection loophole must be closed.

Because of the loopholes provided by the interaction of the Forest Practices Act (FPA) and local County regulations, critical areas and buffers can still be logged under the RC scheme. The FPA allows logging of critical areas unless the land is being "converted" (i.e. developed) to a non-forest use; in that event local critical area regulations apply. Island County's critical area regulations recognize this

[10]https://doh.wa.gov/sites/default/files/legacy/Documents/Pubs/337-101.pdf

supremacy over local regulation.[11] Once developed, additional logging on that parcel will again not be considered a conversion and be exempt from local regulation. The Forest Practices Act allows logging of wetlands, streams, and buffers, impacts that would practically never be allowed under the County's critical area regulations.

This loophole can be closed by specifically including obeying IC critical area regulation in the required approval criteria:

(Proposed language shown in green.)

> **16.17.070 Specific criteria for approval.**
> A. No application for rural cluster approval shall be approved unless it meets the requirements of this section . . .
> 1. Preservation of natural features.
> a. . . .
> b. Open space, in the amount required by ICC 16.17.075, shall be clearly defined and protect natural features. The proposal must include a binding legal mechanism prohibiting commercial logging and clearing of native forest understory ("parking out") and requiring compliance with County critical area requirements in all circumstances.. Trails may be constructed, and control of invasive plants and prescribed burning may be performed as appropriate. Open space shall be designated in the following order of priority:

7. The high number of potential new DU's will drive or induce rural sprawl.
Table 5 shows the potential number of development units the RC scheme could allow. Several details of this analysis are important to understand for evaluating these results:

• The underlying data was obtained from the County Assessors office and was current as of Jan. 23, 2026.

• The analysis is based on individual parcels. For example, a Rural Forest zoned parcel that is 25 acres is analyzed as a having an RC development potential of 1 DU/5 acres or 5 DUs. It does not

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[11] **17.02B.040 - Relationship to other regulations.**
. . .
D. Relationship to Forest Practices Act.
1. Forest practices regulated by, and conducted in full compliance with, Chapter 76.09 RCW and all applicable Washington State forest practices regulations shall not be subject to the requirements of this chapter when the forest practices are conducted under a non-conversion forest practice permit and no conversion option harvest plan as contemplated in section 11.02.270 has been submitted to the County, except as otherwise provided in paragraph 3. below.
. . .
3. During the six (6) years following issuance of a non-conversion forest practice permit, conversions of all or part of a parcel to non-forestry use, as described in Chapter 76.09 RCW, shall cause the entire parcel to be subject to the full requirements of this chapter.

take into consideration whether that landowner may have contiguous property below the 20 acre size threshold for RC developments. For example, if a landowner has contiguous 25 and 15 acre Rural Forest zoned parcels the analysis will only show the 25 acre parcel as potentially developable as an RC; it does not recognize the possibility of adjusting parcel sizes via lot combination or boundary line adjustment.

• I decided to not include an improvement value threshold for this analysis for several reasons. First, the ordinance itself now includes a provision allowing existing structures to be included in the RC for purposes of determining development potential. The ordinance authors appear to recognize that already developed parcels may be re-developed as RCs with increased density; I agree. Second, the time when re-development of these parcels is most likely to occur is when existing ownership of the parcel changes. This may happen, for example, when the owner moves, dies, or must move to a more supportive living situation, and the heirs wish to sell the parcel. In that situation the potential increased density and resulting value of the parcel when developed as an RC will provide an economic incentive for re-development as an RC. Third, over time the increased value due to the possibility of higher density RC development will increase the assessed valuation and resulting tax liability of similar parcels, again providing economic pressure to develop them as RCs. Over time, this could become a self-reinforcing feedback loop.

Table 5. RC potential development.

Zone	Parcel Size (Acres)	Total Acres	Number of Existing Parcels	Acres/DU[12]	Number of Potential RC DUs	Potential New DUs[13]
Rural	≥20	9816.6	298	2.25	3802	3500
Rural	≥20	9816.6	298	2.5	3487	3189
Rural AG	≥20	3447.2	90	5	525	435
Rural Forest	≥20	7508	196	5	1091	895
Commercial AG	≥20	3396.4	96	10	279	183
TOTAL: *1 DU/2.25 Acres*	**>20**	**23,538.6**	**680**		**5697**	**5017**
TOTAL: *1 DU/2.5 Acres*	**>20**	**23,538.6**	**680**		**5382**	**4702**

Table 5 shows that with existing parcelization of the subject zones over 5,000 new DUs could potentially be created that would not be allowed under current zoning. As shown in the next section, almost all of these will not fill the gaps in housing affordability identified in the Land Capacity

[12] 2.25 acres is also modeled for Rural zoned parcels. The zoning ordinance allows a 10% size variation for 5-acre lots. An example is a 9 acre parcel subdivided into two 4.5 acres parcels. It is not clear if this allowance would extend to calculating the density of a Rural zoned RC.

[13] This is calculated as:
Potential New DUs = Number of Potential RC DUs - Number of Existing Parcels.
This assumes that all of existing parcels already have one DU on them. Since not every existing parcel is already developed, the result understates the number of Potential New DUs.

Analysis or based on typical market rate housing in Island County. The effect will be to induce and drive rural sprawl.

8. The market rate RCs do not provide housing in the income brackets that have a housing deficit.

The Land Capacity Analysis does not support the wholesale potential increased density provided in the rural lands and agricultural resource lands. The Land Capacity Analysis categorizes all rural lands (Rural, Rural Ag, and Rural Forest zones) as "low density."[14]. "Low density" lands have "assumed affordability" of 100 – 120+%.[15] (The Commerical Ag zone is simply omitted from the Land Capacity Analysis.) The "low density" 80 – 120+% bracket has an existing capacity surplus for moderate and low density.[16] Housing capacity deficits only occur in the 80% or lower brackets. As shown below, it appears that the RC developments as proposed would contribute little or nothing to providing needed affordable housing in Island County.

I conducted a study to try to determine if the Land Capacity Analysis was still correct in its conclusion that the rural lands will not contribute to providing needed affordable housing in light of the addition of the market rate RCs. Would market rate RCs provide housing cheaply enough to be affordable to the income brackets identified as having a housing deficit? The answer is no.

This analysis has these steps:

i. Determine the Island County annual household median income (AHMI) in dollars for different income brackets from 60%-100%.

ii. Using a standard publicly available housing affordability calculator, determine the maximum value in dollas of a DU that would be affordable at the upper end of each bracket.

iii. Using Island County Assessors data, find developed parcels that serve as analogues to RC developments based on proposed RC density. Determine which income brackets these RCs will likely serve by treating the value of the analogous parcels as representing the likely value of the RC DUs.

i. Determine the Island County annual household median income (AHMI).

Island County median household income in 2025 was $93,221.[17] The AHMI was then calculated for income brackets from 60% – 100% in 10% intervals.

ii. Using a standard publicly available housing affordability calculator, determine the maximum value of a DU that would be affordable at the upper end of each bracket.

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[14] Land Capacity Analysis, p. 17, Table 14.

[15] Land Capacity Analysis, p. 18, Table 15.

[16] Land Capacity Analysis, p. 20, Table 18.

[17] Washington State Median Household Estimates by County (ACS-SAIPE Series)
NOTE: THIS TABLE CONTAINS THE FINAL HOUSEHOLD INCOME ESTIMATES FOR 2025
A downloadable spreadsheet with this data may be found at:
https://ofm.wa.gov/data-research/economy/median-household-income-estimates/

The Fannie Mae Mortgage Affordability calculator was used to determine the value of housing deemed affordable at the different AHMI income levels.[18] Assumptions used were: no debts or monthly payments; 20% down payment; 6% interest; and 30 year fixed mortgage. The first of these may be unrealistic, but render the results somewhat conservative; if anything, they increase the house value deemed affordable by the calculator. The other assumptions are standard for financing market rate housing. The results are shown below in Table 6, below. The Fannie Mae affordability calculator results are that housing affordable by income brackets below 80% AHMI, the brackets with an identified housing capacity deficit according to the Land Capacity Analysis, must cost less than $400,000.

Table 6. Housing affordability for different AHMI brackets.

% Island County Median Income	Annual Income ($)	Monthly Income ($)	Down Payment ($)	Mortgage Loan Amount ($)	Monthly Payment ($)	Monthly Payment – % of Monthly Income	You Can Afford a House Up to ($)
60	55,932.60	4661.05	58,500	234,002	1,678	36	292,502
70	65,254.70	5437.09	70,149	280,597	1,957	36	350,746
80	74,576.80	6214.73	81,828	327312	2,237	36	409,140
90	83,898.90	6991.57	93,492	373,967	2,517	36	467,459
100	93,221.00	7768.42	105,140	420,562	2,796	36	525,702

iii. Using Island County Assessors data, find developed parcels that serve as analogues to RC developments based on proposed RC density. Determine which income brackets these RCs will likely serve by treating the value of the analogous parcels as representing the likely value of the RC DUs. The underlying assumption is that there is no exact analogue for the likely price of market rate RC DUs. The number of PRDs is insufficient to use in a meaningful analysis. For this reason, I used the value of developed lots that are equivalent in size to the RC densities. Rural zoned developed 2-3 acre parcels were used as analogues for RC Rural zoned densities of 1 DU/2.25 or 1 DU/2.5 acres. Similarly, Rural zoned developed 4-6 acre parcels were used as analogues for Rural Ag and Rural Forest zoned RCs with proposed 1 DU/5 acre density.

The RCs are explicitly "market rate." I performed an analysis using County Assessor data to try to determine which income brackets could affordable these DUs. Commercial Ag was omitted from this analysis because I felt that there was no reasonable analogue for which I had value data. The RC lot size of 10 acres is ½ of the normal minimum CA size and no other zone is designated as GMA natural resource lands that the County is mandated to conserve.

The Assessors data was obtained in January 2026 and was current as of Jan. 20, 2026. It was provided in spreadsheet form and was then imported into Filemaker, a widely used relational database. The various datasets obtained from the Assessors' office were linked (related) together. This allows comprehensively searching the data sets by, i.e., parcel numbers and ID; zoning; size; land, improvement, and market valuation; sales history; Assessors codes, etc. Searches can be conducted using any combination of data (i.e., data fields). Searches can use different sets of criteria sequentially and can include or omit the various find requests.

[18] The calculator may be accessed with this link:
Https://yourhome.fanniemae.com/calculators-tools/mortgage-affordability-calculator

Since the Commercial Ag zone was omitted from the analysis, two separate sets of searches were performed; these were for Rural by itself, and Rural Ag and Rural Forest together. In an attempt to at least partially capture recent construction and assure that there was likely a DU present on the found parcels, changed ownership between 1/1/2015 – 1/1/2016 and improvement value of more than $150,000 were included in the search criteria. I felt that this 11 year cohort was long enough to reflect accumulated economic variation and trends, and that the selected improvement value would reflect developed lots while still capturing lower economic value DUs, such as manufactured homes, small owner built homes, etc.

Table 7 summarizes the parcels meeting these criteria:

- Rural zone
- Parcel size range analogous to the proposed density of the RCs if converted to a parcel size
- Number of parcels meeting the search criteria (market value >$150,000, ownerhship change between 1/1/15 – 1/1/2026)
- Minimum, maximum, and average market value

Table 7. All search results.

Zone	Analogous Parcel Size (acres)	Number of Parcels Found	Minimum Market Value ($)	Maximum Market Value ($)	Average Market Value ($)
Rural	2 – 3	1144	276,851	3,016,325	771,845
Rural	4 – 6	1650	3,79241	3,008342	849,800

Table 8 shows the parcels in table 7 separated into different AHMI Income brackets, the number of existing parcels with valuation within those brackets, and the market values of those parcels.

Table 8. Search results by AHMI bracket.

Analogous Parcel Size (acres)	Number of Parcels Meeting Search Criteria	AHMI Bracket (%)	Minimum Market Value ($)	Maximum Market Value ($)	Average Market Value ($)
2 – 3	0	60		292,502	
2 – 3	0	70	292,502.01	350,746	
2 – 3	1	80	406,727	406,727	406,727
2 – 3	8	90	412,952	455,100	437,459
2 – 3	15	100	501926	525,702	498,014
4 – 6	0	60		292,502	
4 – 6	0	70	292,502.01	350,746	
4 – 6	1	80	413,576	413,576	413,576
4 – 6	17	90	416,317	466,512	451,522
4 – 6	84	100	467,764	525,105	498,946

The results show that the approach of using analogous parcels reaches the same conclusion as the Land Capacity Analysis. No parcels were assessed at a value that would be affordable to the AHMI levels where a housing deficit was identified by the Land Capacity Analysis. Only two parcels were valued at the AHMI level at the 80% level, the boundary of that deficit. This confirms that the RC scheme as

currently proposed will make virtually no contribution to providing affordable housing in the AHMI brackets identified in the Land Capacity Analysis as having a housing deficit.