

Appendix D: Housing Technical Appendix

Roslyn Comprehensive Plan 2026 Periodic Update

June 2026

Introduction

This document provides supporting analysis for HB 1220 requirements in the Roslyn Comprehensive Plan periodic update, including demographic data, discussion on displacement, housing capacity findings by income band, and evaluation of consistency with state housing requirements.

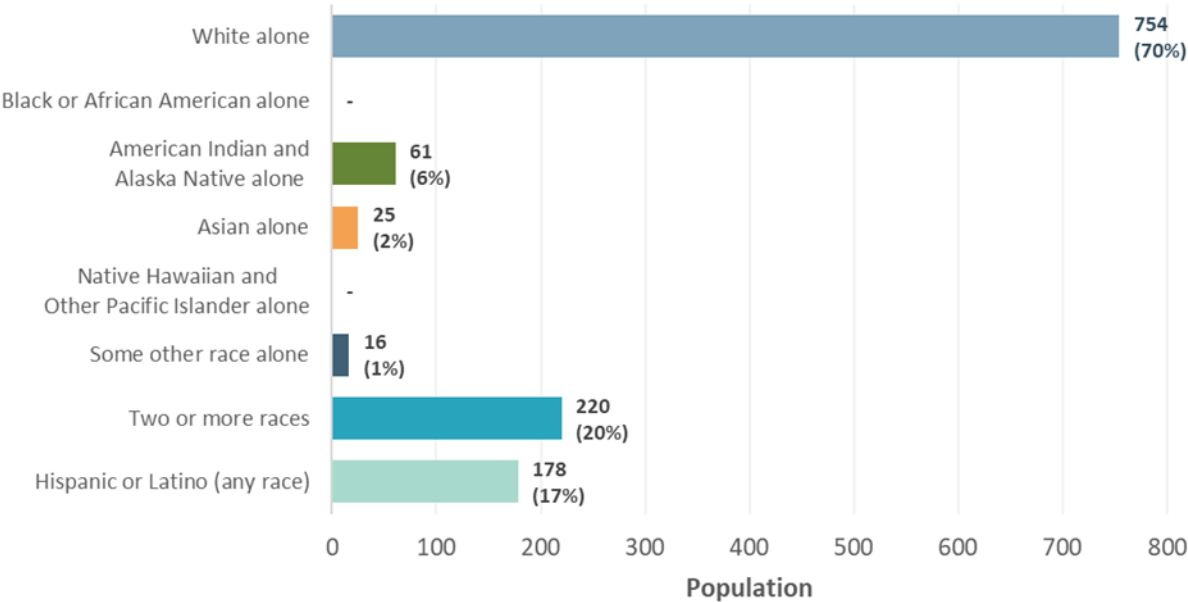
The analysis in this document includes:

- Data on racially disparate impacts, displacement, and exclusion in housing
- A summary of policy analysis findings for racially disparate impacts, displacement, and exclusion in housing
- Method and assumptions details for the housing capacity analysis by income band and STEP housing capacity.
- Completed Department of Commerce “adequate provisions” checklists for housing production and affordability

Racially Disparate Impacts, Displacement, and Exclusion

Approximately 30% of Roslyn’s population identifies as Black, Indigenous, and People of Color, including 20% of the population who identify as two or more races and 17% who identify as Hispanic or Latino (and any race) (Exhibit 1). Compared to Kittitas County as a whole, Roslyn is more diverse in terms of BIPOC population overall. Roslyn has a greater proportion of American Indian and Alaska Native, Asian, and Hispanic or Latino residents, as well as more residents who identify with two or more races. However, 0% of Roslyn’s population identify as Black or African American, compared to 1.1% in Kittitas County (Exhibit 2).

Exhibit 1: Roslyn Race and Ethnicity



Source: American Community Survey 5-year Estimates, 2024; BERK, 2026.

Exhibit 2: Race and Ethnicity County Comparison

STATUS	ROSLYN	KITTITAS COUNTY
White alone	70.1%	82.1%
Black or African American alone	0.0%	1.1%
American Indian and Alaska Native alone	5.7%	0.5%
Asian alone	2.3%	1.7%
Native Hawaiian and Other Pacific Islander alone	0.0%	0.1%
Some other race alone	1.5%	4.9%
Two or more races	20.4%	9.6%
Hispanic or Latino (any race)	16.5%	10.5%

Source: American Community Survey 5-year Estimates, 2024; BERK, 2026.

Most Roslyn residents speak English at home, however the rate of Spanish speakers is higher than Kittitas County (6.8% compared to 5.1%) (Exhibit 3).

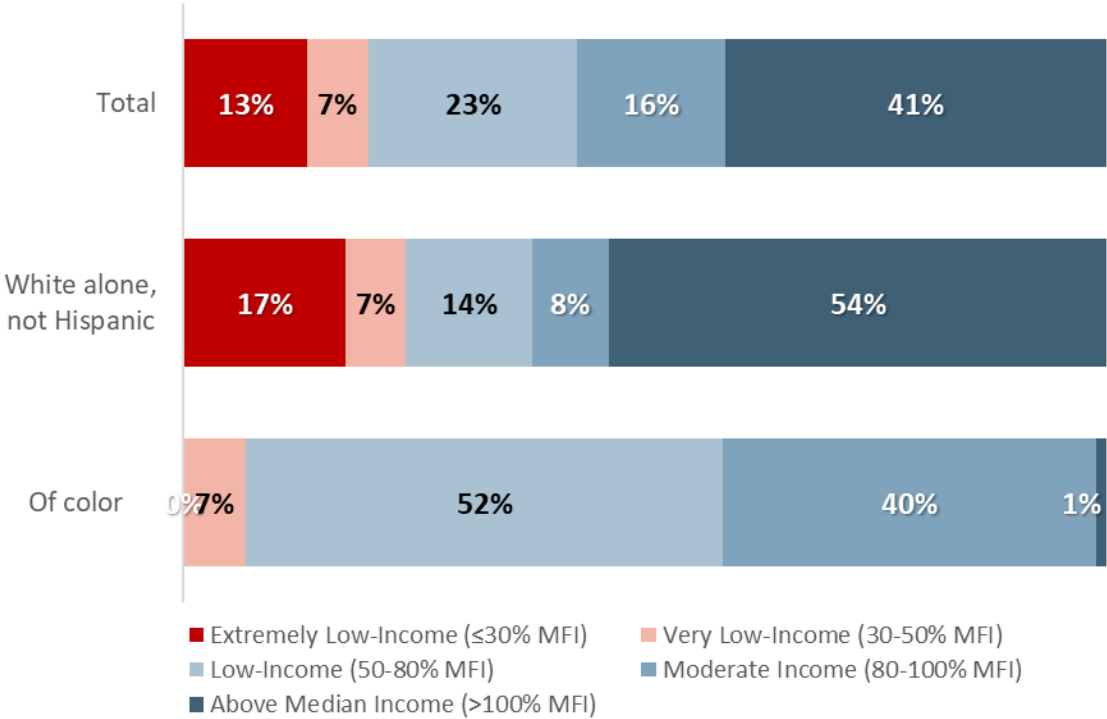
Exhibit 3: Languages Spoken At Home

STATUS	ROSLYN	KITTITAS COUNTY
Only English	91.1%	92.2%
Language other than English	8.9%	7.8%
Spanish	6.8%	5.1%
Other Indo-European languages	1.5%	1.3%
Asian and Pacific Island languages	0.7%	1.0%
Other	0%	0.3%

Source: American Community Survey 5-year Estimates, 2024; BERK, 2026.

While most White, non-Hispanic residents of Roslyn have above-median incomes (54%), this group also has a higher rate of extremely low incomes (17%) compared to the overall population (13%) (Exhibit 4). Most residents of color in Roslyn have low incomes (52%) or moderate incomes (40%). Only 1% of residents of color have incomes above the median.

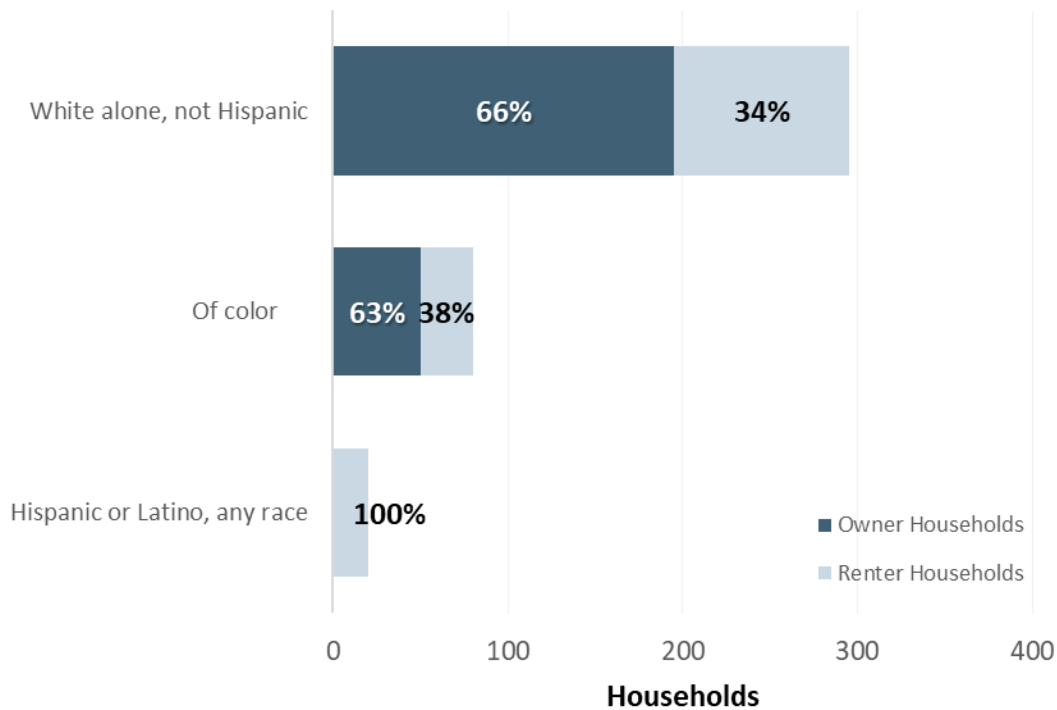
Exhibit 4: Income by Race and Ethnicity



Source: American Community Survey 5-year Estimates, 2024; BERK, 2026.

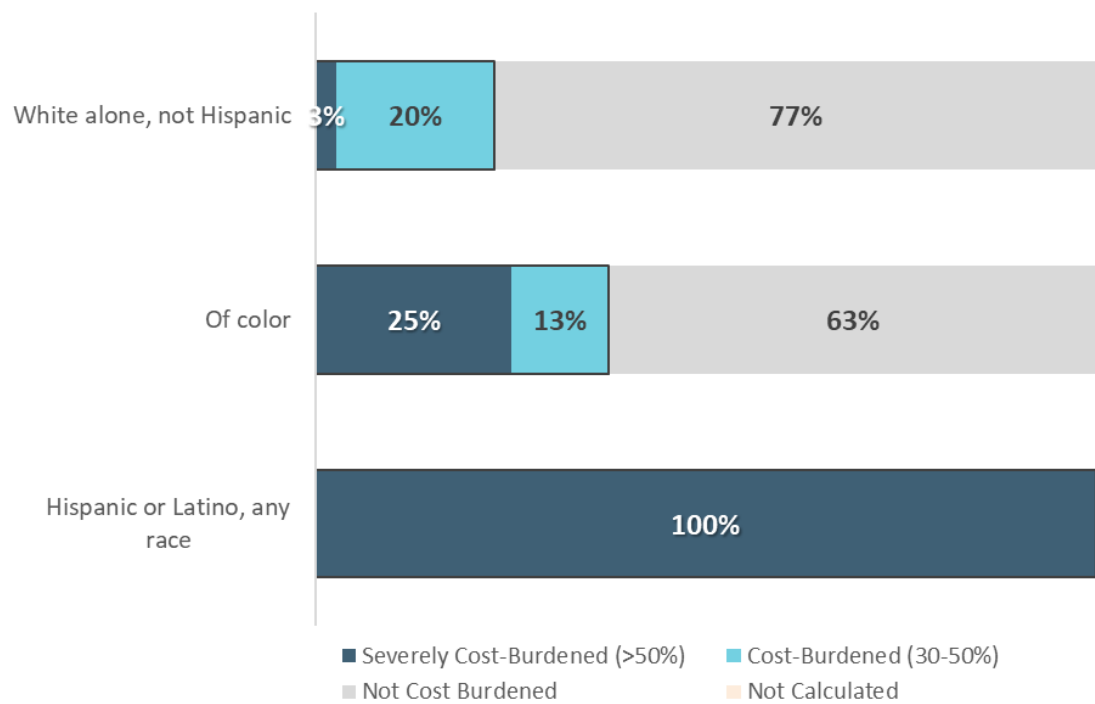
Residents of Roslyn, regardless of race and ethnicity, are more likely to be owners than renters (Exhibit 5). Approximately 23% of White residents are cost-burdened (spending more 30-50% of income on housing) or severely cost-burdened (spending more than 50%) while 38% of residents of color are cost-burdened or severely cost-burdened. It is estimated that 100% of Roslyn’s Hispanic or Latino population rents and is also severely cost-burdened (Exhibit 6).

Exhibit 5: Housing Tenure by Race and Ethnicity



Source: US HUD CHAS Data, 2024; BERK, 2026.

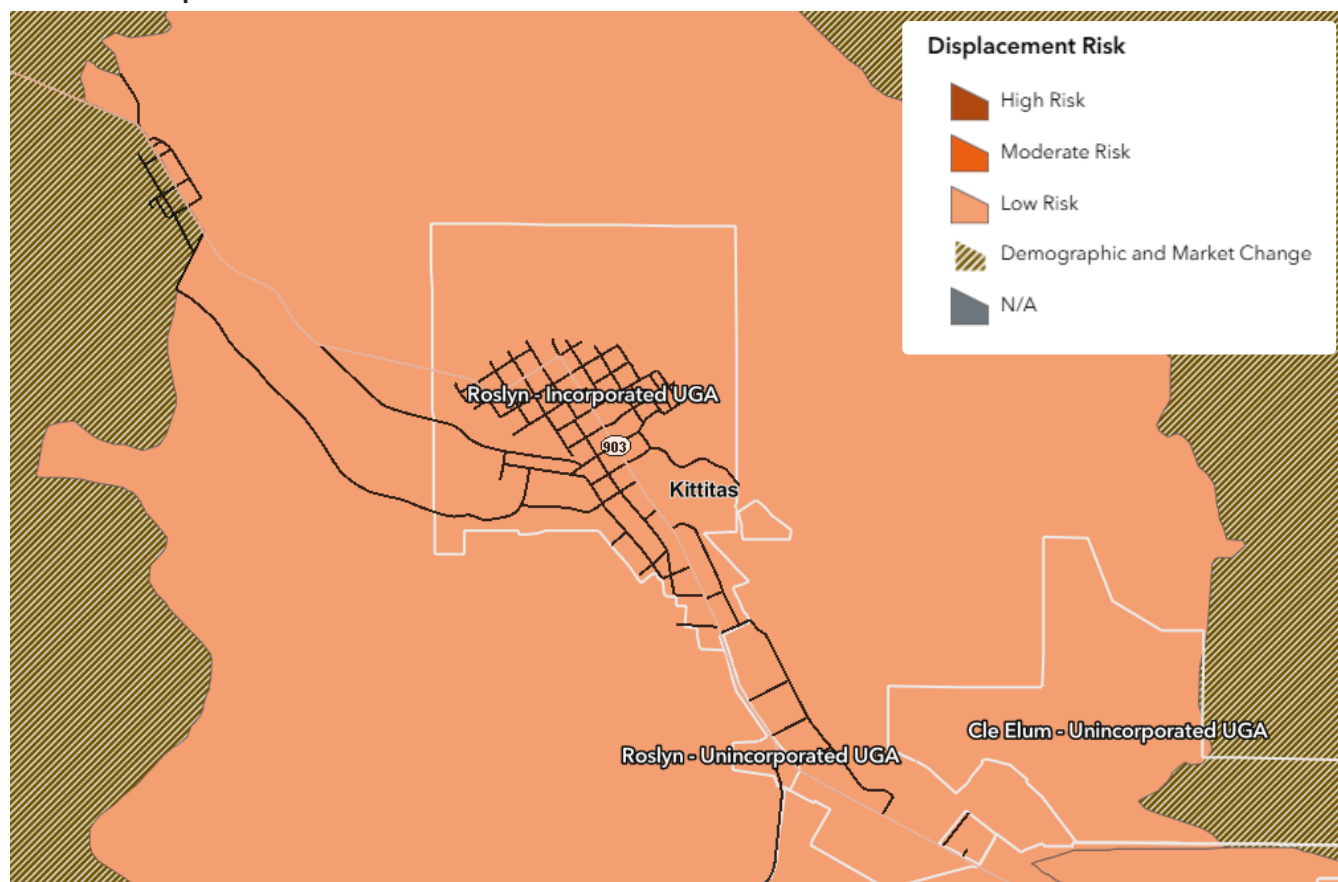
Exhibit 6: Cost Burden by Race and Ethnicity



Source: US HUD CHAS Data, 2024; BERK, 2026.

The Washington State Department of Commerce’s displacement risk mapping shows Roslyn and surrounding areas as low risk for displacement (Exhibit 7).

Exhibit 7: Displacement Risk



Source: Washington Department of Commerce, 2023.

Overall, findings suggest racially disparate impacts in terms of housing costs. Residents of color in Roslyn are less likely to have above-median incomes and more likely to have low or moderate incomes. While housing tenure for BIPOC residents is similar to White residents as a whole, Hispanic or Latino residents are predominantly renters and severely-cost burdened by their housing costs. BIPOC residents overall are also more likely to be cost-burdened or severely-cost burdened by housing than White, non-Hispanic residents. Efforts to improve housing affordability, including planning housing capacity for all income bands and addressing adequate provisions, may therefore reduce racially disparate impacts.

Policy Analysis

To review the Housing Element and related elements of the Comprehensive Plan, a series of evaluation questions were designed to identify policies and regulations that result in racially disparate impacts (RDI) and displacement and exclusion of housing. Key overarching questions, as described in the Commerce guidance for RDI review, include:

- Is the policy effective in accommodating needed housing?
- Does the policy contribute to racially disparate impacts? Displacement? Or exclusion in housing?
- Who benefits and who is burdened by the policy?
- Does the policy increase displacement risk? If so, can this be mitigated through policies or actions?
- Does the policy provide vulnerable communities protection from displacement?

Each policy in the Housing Element and Land Use Element is reviewed using the criteria shown below. Policies evaluated as “C” or “A” are addressed in the Recommendation section.

The policy analysis has informed the preliminary drafts of the updated Comprehensive Plan elements.

Exhibit 8: Policy Evaluation Framework

Criteria	Evaluation
The policy is valid and supports achieving the GMA goal for housing. There is a need for the policy and/or it addresses identified racially disparate impacts, displacement, and exclusion in housing.	“S” Supportive
The policy can help achieve the GMA goal for housing but may be insufficient or does not specifically address racially disparate impacts, displacement, and exclusion in housing.	“A” Approaching
The policy may challenge the jurisdiction’s ability to achieve the GMA goal for housing. The policy’s benefits and burdens should be reviewed to optimize the ability to meet the policy’s objectives while improving the equitable distribution and burdens imposed by the policy.	“C” Challenging
The policy does not affect the jurisdiction’s ability to achieve GMA goal housing and has no influence or impact on racially disparate impacts, displacement, or exclusion.	“NA” Not Applicable

Source: BERK, 2026

Land Use Element

2019 Policy		Evaluation	Changes needed	Relevant changes in Draft Plan (2026)
Goal LU-1	Establish a development pattern that preserves Roslyn's historic character of while allowing for a variety of new development.	A	"Preserves" could be read as exclusionary and inflexible, suggest adjust.	Establish a development pattern that <u>allows for a variety of new development while reflecting Roslyn's historic character and promoting a resilient community.</u> Preserves Roslyn's historic character of while allowing for a variety of new development.
Policy LU 1.1	Designate the general distribution, location and extent of the uses of land for housing, commerce, recreation, open space, public utilities and facilities, and other land uses.	NA	None.	None.
Policy LU 1.2	Implement the following land use categories and their generalized characteristics and densities through the zoning ordinance and other implementing regulations: Residential. Intended to preserve residential neighborhoods in the historic style of the period in which most homes there were built. Associated uses include churches, schools, parks, playgrounds, public uses, home occupations, and bed & breakfast establishments. Accessory housing may be considered as a special conditional use. Commercial. Intended to maintain and enhance the historic character and development pattern of the central	C	Preservation of historic character could be exclusionary of other housing types where middle housing and ADUs were not historically present. ADU code must also now follow state requirements, which add more flexibility.	Implement the following land use categories and their generalized characteristics and densities through the zoning ordinance and other implementing regulations: Residential. Intended to preserve <u>serve as low density</u> residential neighborhoods <u>with single-family housing, middle housing, and accessory dwelling units that incorporate historic design features.</u> in the historic style of the period in which most homes there were built. Associated uses include churches, schools, parks, playgrounds, public uses, home occupations, and bed & breakfast establishments. Accessory housing may be considered as a special conditional use. Commercial. Intended to maintain and enhance the historic character and development pattern of the central business district area through the preservation and renovation of historic buildings, infill of vacant sites <u>with design features that reflect historic character</u> consistent with historic character, and maintaining the pedestrian orientation with a diversity of retail shops and eating establishments. <u>Upper story residential development is also allowed, providing opportunities for mixed use multifamily housing.</u> Examples of

2019 Policy	Evaluation	Changes needed	Relevant changes in Draft Plan (2026)
business district area through the preservation and renovation of historic buildings, infill of vacant sites consistent with historic character, and maintaining the pedestrian orientation with a diversity of retail shops and eating establishments. Examples of uses include retail, service, health care, and office use. Residential development is allowed under certain conditions. Light Industrial. Provides light industrial development with a minimum impact on the community while providing employment opportunities for the residents of Roslyn. Examples of light industrial uses include wholesaling, light manufacturing, and certain retail uses. Open Space. Includes City parks, the Roslyn Urban Forest and the Roslyn Cemeteries. Intended to provide open space for recreational use within the City, to protect and enhance the large urban forest in the northern portion of the City and to preserve and enhance the character of Roslyn's historic cemeteries.			<u>commercial</u> uses include retail, service, health care, and office use. Residential development is allowed under certain conditions. Light Industrial. Provides light industrial development with a minimum impact on the community while providing employment opportunities for the residents of Roslyn. Examples of light industrial uses include wholesaling, light manufacturing, and certain retail uses. Open Space. Includes City parks, the Roslyn Urban Forest and the Roslyn Cemeteries. Intended to provide open space for recreational use within the City, to protect and enhance the large urban forest in the northern portion of the City and to preserve and enhance the character of Roslyn's historic cemeteries.
Policy LU 1.3 Provide for Planning and Historic Preservation Commission review of the existing land use pattern and make recommended revisions to the Future Land Use Map, Official Zoning Map, and other regulations, with a particular emphasis on addressing non-conforming uses.	NA	None.	None.

2019 Policy		Evaluation	Changes needed	Relevant changes in Draft Plan (2026)
Policy LU 1.4	Continue to develop and implement small area studies and subarea plans that help the City achieve its vision for the future as needs are identified.	NA	None.	None.
Goal LU.2	Maintain an adequate housing supply consistent with the City's needs and historic character.	C	"historic character" is vague and could be exclusionary.	Maintain an adequate housing supply consistent with the City's needs and that reflects historic character. design features.
Policy LU 2.1	Preserve and enhance the historic character of Roslyn's low-density residential neighborhoods.	C	"historic character" is vague and could be exclusionary.	Preserve and enhance the Acknowledge the historic character of Roslyn's low-density residential neighborhoods while accommodating growth in line with adopted targets, including targets by income band.
Policy LU 2.2	Provide for accessory dwelling units in residential zones, subject to compatibility with existing residential character and quality living environment.	A	"Existing residential character and quality living environment" is vague and could be exclusionary. HB 1337 also does not allow more restrictive aesthetic requirements on ADUs than other housing types.	Provide for accessory dwelling units in residential zones, subject to compatibility with existing the same aesthetic requirements as other housing types residential character and quality living environment.
Policy LU 2.3	Provide for a diverse choice of housing types while maintaining high standards development, construction, and maintenance.	S	Specify housing types examples.	Provide for a diverse choice of housing types, including duplexes, accessory dwelling units, other middle housing types, and low-rise mixed use multifamily, while maintaining high standards for development, construction, and maintenance.
Policy LU 2.4	Support innovative design options to help preserve significant natural features, provide transitions between different types of	NA	None.	None.

2019 Policy	Evaluation	Changes needed	Relevant changes in Draft Plan (2026)
uses, or to meet other community objectives.			
Policy LU 2.5 Monitor new housing development and occupancy types to ensure capacity to meet projected growth targets.	S	Add mention of targets by income band.	Monitor new housing development and occupancy types to ensure capacity to meet projected growth targets, including targets by income band .
Goal LU.3 Support the continued development of the commercial area to serve the community and attract regional visitors.	NA	None.	None.
Policy LU 3.1 Promote the central business district as the location for a diverse mix of uses, including retail, office, and cultural and community gathering places.	A	Commercial zone also allows upper story residential.	Promote the central business district as the location for a diverse mix of uses, including retail, office, mixed use multifamily residential , and cultural and community gathering places.
Policy LU 3.2 Encourage tourism with land uses that provide service and tourist destination activities.	NA	None.	None.
Policy LU 3.3 Support measures that encourage small locally-owned business growth and retention.	NA	None.	None.
Policy LU 3.4 Ensure that new development and redevelopment maintains and enhances compatibility with the historic character of the central business district.	C	“compatibility with the historic character” could be exclusionary.	Ensure that the design features of new development and redevelopment maintains and enhances compatibility with reflect the historic character of the central business district.
Policy LU 3.4 Promote a pleasant and comfortable pedestrian environment in the central business district, including signage, lighting,	NA	None.	None.

2019 Policy	Evaluation	Changes needed	Relevant changes in Draft Plan (2026)
drought tolerant landscaping, and bicycle/pedestrian amenities.			
Policy LU 3.5 Where appropriate, allow conversion of commercial structures to mixed-use structures, and preserve the commercial street frontage by locating new residential development on the second floor of structures or behind commercial spaces.	S	None.	None.
Goal LU 4 Support light industrial development that positively contributes to Roslyn's economy and character.	NA	None.	None.
Policy LU 4.1 Encourage clean industrial development compatible with the character of the City and preservation of the natural environment.	NA	None.	None.
Policy LU 4.2 Encourage small light industrial uses that will add to economic diversification in Roslyn.	NA	None.	None.
Policy LU 4.3 Establish land use designations to ensure that industrial development is compatible with surrounding uses.	NA	None.	None.
Goal LU 5 Support sustainable new development and redevelopment consistent with the historic character of the community.	C	"consistent with the historic character" could be exclusionary.	Support sustainable new development and redevelopment that incorporates design features that reflect the consistent with the historic character of the community.
Policy LU 5.1 Consider revisions to development regulations to promote infill development and the efficient use	A	"consistent with the historic character and development	Consider revisions to development regulations to promote infill development and the efficient use of land, while also incorporating design features that are

2019 Policy	Evaluation	Changes needed	Relevant changes in Draft Plan (2026)
of land, consistent with the historic character and historic development pattern of the community.		pattern” could be exclusionary.	consistent with the historic character and historic development pattern of the community.
Policy LU 5.2 Develop a parking management strategy to address parking needs in the community. This may include but is not limited to shared parking and/or the development of small dispersed parking areas as opposed to larger parking lots or structures.	S	None.	None.
Policy LU 5.3 Avoid or mitigate potential adverse impacts of non-residential development by incorporating greenbelt buffers, landscaping, adequate utilities, noise, air, and water pollution control devices, attractive fencing or similar measures in keeping with the historic character of the community.	NA	None.	None.
Policy LU 5.4 Ensure dark skies within Roslyn and work with Kittitas County to enact dark skies ordinances county-wide.	NA	None.	None.
Policy LU 5.5 Consider the establishment of a new zoning overlay for existing historic business properties outside the central business core.	NA	None.	None.
Goal LU 6 Prepare and implement a Master Planned Development process to regulate	NA	None.	None.

2019 Policy	Evaluation	Changes needed	Relevant changes in Draft Plan (2026)
development of designated Unique Community Assets.			
Policy LU 6.1 Allow areas designated as a Unique Community Asset to develop in accordance with the provisions of a Master Plan approved by the City Council, provided that the following conditions the area: consists of a single parcel or contiguous parcels, a. is under common ownership or control and located fully within the City's municipal boundaries, b. is designated by the City Council as a Unique Community Asset based on a finding by the City Council that the site has unique historic attributes or characteristics, contains or is adjacent to environmentally sensitive areas, and is located near or adjacent to public facilities, such as public trails.	S	None.	None.
Policy LU 6.2 Revise development regulations and zoning controls to establish a Master Planned Development process for any designated Unique Community Assets. The Master Planned Development process shall provide for public comment and shall identify: a. The range, mix, and intensity of uses permitted;	S	None.	None.

2019 Policy	Evaluation	Changes needed	Relevant changes in Draft Plan (2026)
b. A binding site layout defining areas not suitable for development with inclusion of setbacks, buffers, and landscaping requirements; c. Access and development standards; d. Provisions to protect the City's historical character and designation as a National Historic District; and e. Design guidelines.			
Policy LU 6.3 Integrate approved master planned developments into the City's Comprehensive Plan as subarea plans.	S	None.	None.
Policy LU 6.4 Allow development agreements in accordance with the provisions of the Revised Code of Washington to implement approved master planned development(s).	NA	None.	None.
Policy LU 6.5 Provide for tailored environmental review of proposed development that provide timely and meaningful opportunities for public involvement and that protect the historical character of the site and the environmental quality of the community.	C	"protect the historical character of the site" could be exclusionary.	Provide for tailored environmental review of proposed development that provide timely and meaningful opportunities for public involvement, that ensure Roslyn's heritage is reflected through building and site design , and that protect the historical character of the site and the environmental quality of the community.
Goal LU 7 Provide adequate locations for siting essential public facilities.	S	None.	None.

2019 Policy	Evaluation	Changes needed	Relevant changes in Draft Plan (2026)
Policy LU 7.1 Locate and develop all essential public facilities so that they are compatible with adjoining land uses.	NA	None.	None.
Policy LU 7.2 Locate essential public facilities where they can best serve the populations that they serve.	S	None.	None.
Policy LU 7.3 Plan for the location of essential public facilities in coordination with other local and regional planning goals.	S	None.	None.
Policy LU 7.4 Use the City's established process for review and decisions on the siting of an essential public facility, including appropriate conditions and mitigation to minimize impacts to the community.	S	None.	None.
Goal LU 8 Promote community health through the City's land use pattern.	NA	None.	None.
LU Policy 8.1 Promote connectivity of the City's non-motorized system through connections to the existing and planned trail system, residential neighborhoods, and the commercial center.	NA	None.	None.
Policy LU 8.2 Encourage pedestrian scale improvements, such as directional signs, benches, landscaping, and other features that promote pedestrian activity.	NA	None.	None.

2019 Policy	Evaluation	Changes needed	Relevant changes in Draft Plan (2026)
Policy LU 8.3 Within the commercial center, provide attractive street fronts and connecting walkways to accommodate pedestrians.	NA	None.	None.

Housing Element

2019 Policy	Evaluation	Changes needed	Relevant changes in Draft Plan (2026)
Goal H 1 Encourage the provision of affordable housing designed to be compatible with the historic character and development pattern of the community.	A	“compatible with the historic character and development pattern of the community” is vague and could potentially be exclusionary of non-single family housing types.	Encourage the provision of affordable housing <u>a variety of housing types available at all income levels, with design features that reflect the historic character of the community,</u> designed to be compatible with the historic character and development pattern of the community <u>and improve resilience from the impacts of a changing climate.</u>
Policy H 1.1 Provide an adequate supply of land to accommodate the City’s housing growth target.	S	Specify that the growth target includes targets by income band.	Provide an adequate supply of land to accommodate the City’s housing growth target, <u>including targets by income band and provisions for permanent supportive and emergency housing.</u>
Policy H 1.2 Encourage a variety of housing types and densities, including multifamily and special needs housing, to provide affordable choices for all.	S	None.	None.
Policy H 1.3 Encourage innovative approaches that are historically appropriate in the provision of affordable housing including but not limited to accessory dwelling units,	A	“Historically appropriate” is vague and could be exclusionary of certain housing types if not already present.	Encourage innovative approaches that are historically appropriate in the provision of affordable housing including but not limited to

2019 Policy		Evaluation	Changes needed	Relevant changes in Draft Plan (2026)
cottages, live/work spaces, lofts, and/or mixed-use developments.				accessory dwelling units, cottages, live/work spaces, lofts, and/or mixed-use developments.
Policy H 1.4 Consider innovative economic techniques for providing affordable housing as part of the City's overall economic development strategy.	S	None.		None.
Policy H 1.4 Ensure that manufactured housing is allowed in all residential zones and is not regulated differently than site-built housing.	S	None.		None.
Policy H 1.5 Support home ownership opportunities for residents and all economic segments of the community.	S	None.		None.
Policy H 1.6 Encourage development of housing types to support aging in place, special needs, handicapped accessibility.	S	None.		None.
Policy H 1.7 Promote and enforce City codes that maintain building safety, property maintenance, and public participation in neighborhood clean-ups and improvement programs.	NA	None.		None.
Policy H 1.8 Require that housing design is consistent with the historic character and development pattern of the community.	C	"consistent with the historic character and development pattern of the community" is vague and could potentially be exclusionary of non-single family housing types.		Require that <u>new housing includes design features that is consistent with reflect</u> the historic character and development pattern of the community <u>while incorporating resilience to wildfire and other climate change exacerbated hazards in building design and materials.</u>

2019 Policy		Evaluation	Changes needed	Relevant changes in Draft Plan (2026)
Policy H 1.9	Prevent the consolidation of lots and/or the construction of large-scale single-family residences not in keeping with the historic character and development pattern in the community.	A	This rationale could also be used against middle housing types and therefore could be exclusionary.	Prevent the consolidation of lots and/or the construction of large-scale single-family residences not in keeping with the historic character and development pattern in the community. <u>Discourage the construction of large-scale single family residences in order to reduce demolition of older, more affordable housing stock and to ensure Roslyn's housing capacity for smaller units and a wider variety of housing types that meet local housing needs.</u>
Policy H 1.10	Review onsite parking requirements for residential developments, including accessory dwelling units, and revise development regulations as needed to promote the construction of a variety of housing types consistent with the historic character and development patterns of the community.	A	"consistent with the historic character and development pattern of the community" is vague and could potentially be exclusionary of non-single family housing types. Other policies get at reflecting historic character through design.	Review onsite parking requirements for residential developments, including accessory dwelling units, and revise development regulations as needed to promote the construction of a variety of housing types consistent with the historic character and development patterns of the community.
Policy H 1.11	Collaborate with regional jurisdictions to meet housing growth targets and address housing issues that cross jurisdictional boundaries.	S	Add mention of STEP housing.	Collaborate with regional jurisdictions to meet housing growth targets and address housing issues that cross jurisdictional boundaries, <u>including needs for emergency and permanent supportive housing.</u>

Housing Capacity Analysis by Income Band

The Land Use Element of the Comprehensive Plan includes the results of the housing capacity analysis by income band for each growth and comparison to targets. The following provides background on how the capacity analysis was performed.

Findings

As described in the Land Use Element of the Comprehensive Plan, Roslyn has adequate capacity to accommodate overall housing and jobs targets and housing targets by income band through 2046. There is no target for emergency housing beds in Roslyn or elsewhere in Kittitas County. There is also no housing or jobs target for the unincorporated urban growth area (UGA).

Steps

The housing capacity analysis followed the following steps:

- Used Kittitas County assessor data as the base
- Categorized vacant, partially-used, underutilized, and developed parcels
- Updated parcel status based on permit data from 2019-2025
- Used City critical areas mapping as a base and updated where site survey was available for the city's largest vacant parcel (number 456234).
- Applied density, market factor, and housing type assumptions by zone for each alternative and categorized by affordability level
- Manually adjusted specific parcels with church property bonuses
- Summarized capacity by income band

Assumptions

Affordability assumptions are based on guidance from Commerce for a moderate-cost community (Exhibit 9). Other assumptions are detailed in Exhibit 10 and are based on guidance from Commerce, Kittitas County recommendations, Roslyn land use code, and land capacity analysis best practices.

Exhibit 9: Affordability Assumptions

Housing Type	Affordability Level	Zones
Low Density (detached single-family)	Higher Income (>120% AMI)	Residential Urban Forest Overlay
Moderate Density (townhomes, duplexes, multiplexes)	Moderate Income (80-120% AMI)	Residential, Residential Commercial Overlay

Housing Type	Affordability Level	Zones
Low-Rise (walk-up apartments, condos), 2-3 floors)	Low Income (0-80% AMI)	Commercial, Light Industrial Master Planned Development Overlay Religious organization vacant properties
ADUs	Low Income (50-80% AMI)	Residential, Residential Commercial Overlay (with ADU assumptions applied, see below)

Source: BERK, 2026; City of Roslyn, 2026; Washington Department of Commerce, 2026.

Exhibit 10: Other Land Capacity Analysis Assumptions

Assumption		Rationale
Percent of single family parcels with ADU “capacity”	7.5%	This assumes code updates to comply with HB 1337. Roslyn also has existing code for ADUs that is more flexible in some places than HB 1337 requires (for example, parking). Commerce guidance recommends maximum 10% assumption.
Possible ADUs per lot	1.25	With code updates, Roslyn will allow up to two ADUs per lot. This assumes one in four could have capacity for two ADUs.
Church density assumption	20 dua	This assumes townhome style development or similar on limited vacant sites.
Rezones	One rezone from Residential to Commercial is assumed – parcel 142634	Based on amendment request from property owner and staff review
Market factor	Vacant – 10% Partially used or underutilized – 25% Church-owned lot – 25%	Similar assumptions to other LCAs in Washington.
Infrastructure deduction	10%	Kittitas County suggests 5-15%.
Density	Residential zone – per minimum lot sizes	Code requires housing in these zones to be on upper floors, as

	Assumption	Rationale
	Commercial zone and MPD overlay – 24 dua	apartment style housing. 24 dua is on the conservative end of a density range for a three-story apartment building (based on 35 foot height limit). Mixed use split and deductions are also applied to calculations and would result in lower dua in practice.
Mixed Use Split	50% residential / 50% commercial in Commercial zone and MPD overlay	Code requires housing in these zones to be on upper floors, as apartment style housing. This assumes that some parcels would be fully developed as commercial and others would have ground floor commercial and upper-story residential.

Source: BERK, 2026; City of Roslyn, 2026; Kittitas County, 2025.

Commerce “Adequate Provisions” Checklists

The following analysis is based on a review of the code and staff input.

Moderate Density housing and Low-rise/Mid-rise housing barrier review checklist

The checklists for moderate density housing and low-rise/mid-rise housing have been combined as the barriers are similar for these housing types in the Roslyn context.

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
DEVELOPMENT REGULATIONS			
Unclear development regulations	No.	Developer feedback has been more related to restrictions, not clarity.	N/A
Prohibiting some moderate density housing types, such as: ▪ Duplexes ▪ Triplexes ▪ Four/five/six-plexes ▪ Townhomes ▪ Cottage housing ▪ Live-work units ▪ Manufactured home parks	No.	Roslyn explicitly allows duplexes. Other housing types would be allowed in some zones as multifamily if including ground-floor commercial, including live-work units in the Commercial Zone and Industrial - Master Planned Development overlay. Demand to develop these housing types has been low. HB 1110 does not apply to Roslyn as the city is too small. Roslyn does not allow mobile homes or RV parks in any zone.	Could adjust code to make middle housing types (such as live-work units and townhomes) more explicitly allowed.

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
High minimum lot sizes	No.	Staff have not received feedback on lot size as a barrier to housing development. Many existing residential parcels are around 6,000-7,000 square feet with narrow street frontages. The current minimum is 6,500 square feet for newly platted residential lots.	Could consider reducing minimum lot size to 5,000 square feet, similar to Cle Elum.
Low maximum densities or low maximum FAR	No.	Does not apply, there is no maximum density or maximum FAR (just height limits).	
Low maximum building heights	No.	Roslyn has a 35-foot height limit. Guidance from Commerce middle housing model ordinance suggests 35 feet or higher. A two or three story low-rise apartment building is possible with a 35-foot limit.	
Large setback requirements	No.	Setbacks are already minimal, and create existing issues with snowfall so should not be reduced further.	
High off-street parking requirements	Yes.	Currently requires two spaces per dwelling unit, which can often be accommodated for single-family development but	Consider reducing parking requirement to 1 to 1.5 spaces per multifamily unit.

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
		would require a large amount of parking for middle housing and multifamily that may be challenging to accommodate.	
High impervious coverage limits (lot coverage)	No.	Existing coverage limits are 60% for residential and 100% for the commercial zone.	
Lack of alignment between building codes and development codes	No.	Has not been suggested as a barrier by applicants.	
Other (for example: complex design standards, tree retention regulations, historic preservation requirements, ground floor retail requirements, open space requirements)	Yes.	Tree requirements in Roslyn are minimal and only protect a few significant trees. Developers have suggested that the design review process slows down projects. The design review process supports the City's National Historic District designation. Mixed-use buildings in the Commercial zone and in the Master Planned Development Overlay require ground floor commercial uses.	Potentially create fact sheets to make the design review process and requirements clearer. Review ground floor retail requirements and consider adding flexibility.
PROCESS OBSTACLES			
Conditional use permit process	No.	There are no housing types that are conditional uses in any zone.	
Design review	Yes.	Developers have suggested that the design review process	Potentially create fact sheets to make the design review

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
		slows down projects. The design review process supports the City's National Historic District designation.	process and requirements clearer.
Lack of clear and accessible information about process and fees	Yes.	Staff have received feedback that applicants are unclear on the process and fees.	Potentially create fact sheets to make the permit process and fees more clear.
Permit fees, impact fees and utility connection fees	Yes.	This has not historically been an obstacle based on feedback, however utility fees are being raised in 2026 to keep up with infrastructure needs. There are no impact fees in effect.	2026 utility rates have already been adopted but if future feedback indicates this is an obstacle, could revisit for certain housing types.
Processing times and staffing challenges	Yes.	Applicants have given feedback that the process is slow. Roslyn has one planner who handles code compliance, permit applications, and long-range planning so capacity is limited.	Could provide more clarity on processing timelines via website and applicant meetings.
SEPA process	No.	This has not been cited as an issue by applicants.	
LIMITED LAND AVAILABILITY AND ENVIRONMENTAL CONSTRAINTS			
Lack of large parcels for infill development	Yes.	Much of Roslyn is built out. The former mine site is the largest available parcel and owner has expressed intent to develop as	Continue working with MPD applicants to encourage housing production.

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
		mixed use, including housing. The site has received a Master Planned Development Overlay designation.	
Environmental constraints	Yes.	Wetland buffers currently exceed Ecology recommendations.	Update Critical Areas Ordinance for best available science, including smaller buffers.

Supplementary barrier review checklist for PSH and emergency housing

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barriers.
DEVELOPMENT REGULATIONS			
Spacing requirements (for example, minimum distance from parks, schools or other emergency/PSH housing facilities) ¹	No.	City does not have existing code on PSH and emergency housing	When developing code, ensure requirements align with Commerce guidance
Parking requirements	No.	City does not have existing code on PSH and emergency housing	When developing code, ensure requirements align with Commerce guidance

¹ Note that RCW 35A.21.430 expressly states requirements on occupancy, spacing, and intensity of use may not prevent the siting of a sufficient number of permanent supportive housing, transitional housing, indoor emergency housing or indoor emergency shelters necessary to accommodate each code city's projected need for such housing and shelter under RCW 36.70A.070(2)(a)(ii). The restrictions on these uses must be to protect public health and safety.

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barriers.
On-site recreation and open space requirements	No.	City does not have existing code on PSH and emergency housing	When developing code, ensure requirements align with Commerce guidance
Restrictions on support spaces, such as office space, within a transitional or PSH building in a residential zone	No.	City does not have existing code on PSH and emergency housing	When developing code, ensure requirements align with Commerce guidance
Arbitrary limits on number of occupants (in conflict with RCW 35A.21.314)	No.	City does not have existing code on PSH and emergency housing	When developing code, ensure requirements align with Commerce guidance
Requirements for PSH or emergency housing that are different than the requirements imposed on housing developments generally (in conflict with RCW 36.130.020)	Yes.	City does not have existing code on PSH and emergency housing	Develop code for PSH and emergency housing, ensuring requirements are not more restrictive.
Other restrictions specific to emergency shelters, emergency housing, transitional housing and permanent supportive housing	No.	City does not have existing code on PSH and emergency housing	When developing code, ensure requirements align with Commerce guidance

Accessory dwelling unit barrier review checklist

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barriers.
DEVELOPMENT REGULATIONS			
- Consistent with HB 1337 (2023) - Must allow two ADUs on each lot in urban growth areas; - May not require the owner to occupy the property, and may not prohibit sale as independent units, but may restrict the use of ADUs as short term rentals;	Yes	Roslyn has an ADU code but it is not in alignment with some of these requirements.	Update ADU code in alignment for HB 1337.

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barriers.
▪ Must allow an ADU of at least 1,000 square feet; ▪ Must set parking requirements based on distance from transit and lot size; ▪ May not charge more than 50% of the impact fees charged for the principal unit; ▪ Must permit ADUs in structures detached from the principal unit; ▪ May not restrict roof heights of ADUs to less than 24 feet, unless that limitation applies to the principal unit; ▪ May not impose setback requirements, yard coverage limits, tree retention mandates, restrictions on entry door locations, aesthetic requirements, or requirements for design review for ADUs that are more restrictive than those for principal units; ▪ Must allow an ADUs on any lot that meets the minimum lot size required for the principal unit; ▪ Must allow detached ADUs to be sited at a lot line if the lot line abuts a public alley, unless the city or county routinely plows snow on the public alley; ▪ Must allow conversions from existing structures, even if they violate current code requirements for setbacks or lot coverage; and ▪ May not require public street improvements as a condition of permitting ADUs.			
Unclear development regulations	No.	ADU code is easy to find and clear (Chapter 18.140)	
Large setback requirements	No.	Setbacks are not distinct from requirements for other unit types.	
Off-street parking requirements	No.	City code already allows reduced parking for	

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barriers.
		detached ADUs, and no parking is required for attached ADUs.	
Other (for example: burdensome design standards, tree retention regulations, historic preservation requirements, open space requirements, etc.)	No.	Design standards are the same for ADUs and other housing types.	
PROCESS OBSTACLES			
Lack of clear and accessible information about process and fees	Yes.	Staff have received feedback that applicants are unclear on the process and fees.	Potentially create fact sheets to make the permit process and fees more clear.
Permit fees, impact fees and utility connection fees that are not proportionate to impact	No.	Fees are generally lower for ADUs than other residences because they are based on square footage. There are no impact fees in effect.	
Processing times and staffing challenges	Yes.	Applicants have given feedback that the process is slow. Roslyn has one planner who handles code compliance, permit applications, and long-range planning so capacity is limited.	Could provide more clarity on processing timelines via website and applicant meetings.

Checklist for local option tools for addressing affordable housing funding gaps

Adopted housing targets for Roslyn include a total of 178 units serving incomes below 50% of area median income (AMI) by 2046. These income bands are rarely served by market rate units and many households will require subsidies for housing. Using median per unit costs for affordable housing projects from the Washington State Housing Finance Commission's [December 2025 report](#) (\$414,000 per unit), this could cost more than \$73 million to build in 2025 dollars. In addition to external sources of incentives and funds, the table below outlines potential local funding tools and implementation status.

Local option tools for addressing affordable housing funding gaps*	Implementation status	Plans for implementation
Housing and related services sales tax (RCW 82.14.530)	Not implemented.	None.
Affordable housing property tax levy (RCW 84.52.105)	Not implemented.	None.
REET 2 (RCW 82.46.035) - GMA jurisdictions only and only available through 2025	Implemented, but not used explicitly for housing. Generates minimal revenue.	
Affordable Housing Sales Tax Credit (RCW 82.14.540) - was only available to jurisdictions through July 2020	Not implemented.	None.
Lodging Tax (RCW 67.28.150 and RCW 67.28.160) to repay general obligation bonds or revenue bonds	Implemented, but not currently used for affordable housing.	
Mental Illness and Drug Dependency Tax (RCW 82.14.460) - jurisdictions with a population over 30,000	Not applicable.	
Donating surplus public lands for affordable housing projects (RCW 39.33.015)	Not implemented.	Could be considered if approached by an affordable housing developer and if a site were vacant. The City owns very limited vacant land.
Impact fee waivers for affordable housing projects (RCW 82.02.060)	Not implemented. There are no impact fees in Roslyn currently.	
Application fee waivers or other benefits for affordable housing projects (RCW 36.70A.540)	Not implemented.	Consider with 2026 code updates.

Local option tools for addressing affordable housing funding gaps*	Implementation status	Plans for implementation
Multifamily Tax Exemption (MFTE) with affordable housing requirement (RCW 84.14)	Not implemented.	None. Planner capacity to manage a program is limited (one planner for current and long-range planning).
General funds (including levy lid lifts to increase funds available)	Not implemented.	None.

* Some tools may be unavailable for certain jurisdictions. For example, only GMA jurisdictions can use REET 2, or the surrounding county may have already implemented the housing and related services sales tax. See MRSC's summary of [Affordable Housing Funding Sources](#) for more details and the Association of Washington Cities (AWC)/MRSC booklet on [Homelessness & housing toolkit for cities](#) (2022).