



CITY OF
TUMWATER

**PLANNING COMMISSION
MEETING AGENDA**

**Online via Zoom and In Person at
Tumwater Fire Department
Headquarters, Training Room, 311 Israel
Rd. SW, Tumwater, WA 98501**

**Tuesday, August 22, 2023
7:00 PM**

1. Call to Order
2. Roll Call
3. Changes to Agenda
4. Commissioner's Reports
5. Manager's Report
6. Public Comment
7. 2025 Comprehensive Plan Periodic Update – Housing
8. Next Meeting Date - 09/12/2023
9. Adjourn

Meeting Information

The public are welcome to attend in person, by telephone or online via Zoom.

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Public Comment

The public is invited to attend the meeting and offer comment. The public may register in advance for this webinar to provide comment:

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After registering, you will receive a confirmation email containing information about joining the webinar.

The public may also submit comments prior to the meeting by sending an email to:

cdd@ci.tumwater.wa.us. Please send the comments by 1:00 p.m. on the date of the meeting.

Comments are submitted directly to the Commission Members and will not be read individually into the record of the meeting.

If you have any questions, please contact Planning Manager, Brad Medrud at (360) 754-4180 or bmedrud@ci.tumwater.wa.us.

Post Meeting

Audio of the meeting will be recorded and later available by request, please email CityClerk@ci.tumwater.wa.us.

Accommodations

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What is the Planning Commission?

The Tumwater Planning Commission is a citizen advisory commission that is appointed by and advisory to the City Council on the preparation and amendment of land use plans and implementing ordinances such as zoning. Actions by the Planning Commission are not final decisions; they are Commission recommendations to the City Council who must ultimately make the final decision. If you have any questions or suggestions on ways the Commission can serve you better, please contact the Community Development Department at (360) 754-4180.

Decorum Statement

Welcome to the Planning Commission meeting. We thank you for attending.

The City Council encourages community engagement in local government and provides a variety of ways to participate.

The Chair of the Planning Commission will be responsible for conducting orderly and efficient meetings within the scheduled time. To accomplish that, the Chair will maintain order and decorum and can regulate inappropriate debate, repetitious discussion, and disruptive behavior when needed.

The Chair will recognize those that wish to speak and may limit the time allowed for individual comments. City staff will record questions and comments during the meeting. If an issue or question cannot be addressed during the meeting, City staff will address the issue or respond to the question by following up with the individual.

We respectfully request that attendees refrain from disruptions during the meeting and comply with decorum rules.

Thank you for participating.

TO: Planning Commission
FROM: Brad Medrud, Planning Manager
DATE: August 8, 2023
SUBJECT: 2025 Comprehensive Plan Periodic Update – Housing

1) Recommended Action:

This is a discussion item about the current Housing Element for the 2025 Comprehensive Plan periodic update. Please review the attached memorandum and other materials and be prepared to discuss.

2) Background:

On a ten-year cycle, the City is required to conduct a Growth Management Act periodic update of its Comprehensive Plan and related development regulations. For the current cycle, the City is required to complete work on the periodic update by June 30, 2025. Work on the periodic update started last fall.

The Comprehensive Plan document that will come out of the periodic update process will be shorter, leaner, and more user friendly and consist of shorter individual Elements focusing on goals, policies, and actions with appendices containing the required technical information. At the end of the process, there will also be a brief Comprehensive Plan goal and policy guide for use by staff and policymakers.

The updated Comprehensive Plan will address diversity, equity, and inclusion throughout the Plan. [2025 Comprehensive Plan Update | City of Tumwater, WA](#) contains links to guidance material and information about the update.

The intent of this worksession is to present and discuss the current Housing Element and update guidance for the periodic update.

4) Alternatives:

☐ None.

6) Attachments:

- A. Staff Report
- B. Presentation
- C. Housing Element, Amended 2021
- D. Commerce Periodic Update Checklist March 2023
- E. Guidance for Updating Your Housing Element
- F. Racially Disparate Impacts Guidance
- G. Commerce Housing Introduction - Periodic Update Presentation

STAFF REPORT

Date: August 22, 2023
 To: Planning Commission
 From: Brad Medrud, Planning Manager



2025 Comprehensive Plan Periodic Update – Housing Element

On a ten-year cycle, the City is required to conduct a Growth Management Act periodic update of its Comprehensive Plan and related development regulations. For the current cycle, the City is obligated to complete work on the periodic update by June 30, 2025. Work on the periodic update started last fall.

The updated Comprehensive Plan will address diversity, equity, and inclusion throughout the Plan and incorporate a large number of state required changes addressing housing, climate change, and other topics, as well as City amendments identified through the public engagement process.

The intent of the Planning Commission meeting on Tuesday, August 22, 2023, is to start the initial review of the Housing Element by discussing the state requirements and introducing the current version of the Element. The initial review of the Housing Element will continue at the September 26, 2023 Planning Commission meeting with staff from the State Department of Commerce.

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1 – The Need

It is clear there is a need to do more to address housing supply as part of the Comprehensive Plan update, even without the state requirements to so.

According to the State Department of Commerce, statewide 1.1 million new homes will be needed in the next 20 years.

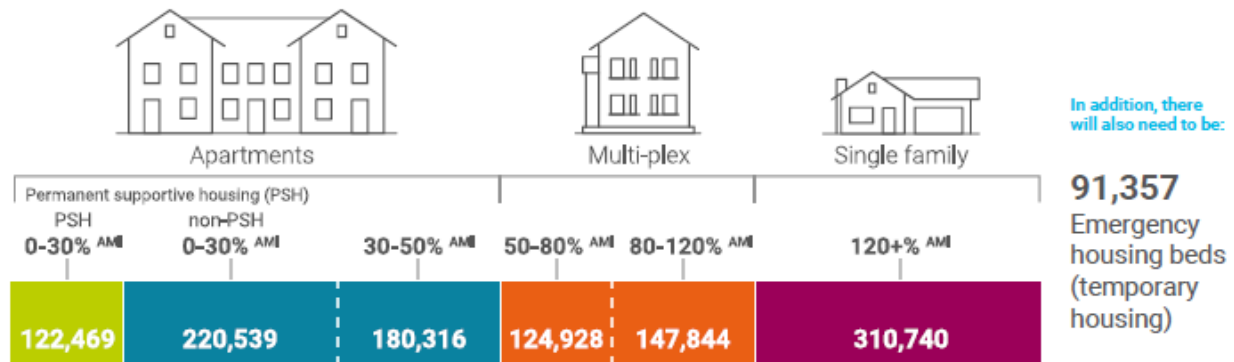


Figure 1. State Department of Commerce.

According to the December 2022 Puget Sound Regional Council and State Department of Commerce Housing Survey, 83% of the respondents said more reasonably priced housing was needed in their communities and 78% said they wanted more housing options for people in their communities.

According to the survey, housing costs were a top issue for four times as many respondents (39%), compared to traffic and transportation (8%).

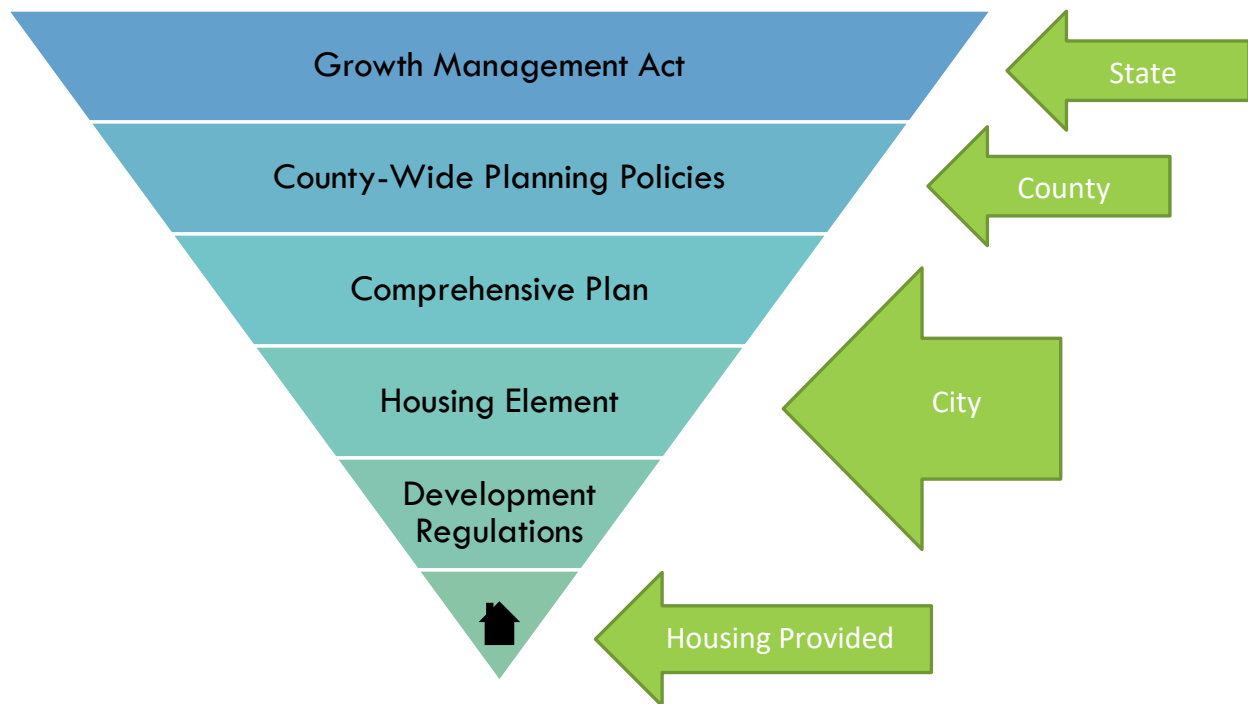
Other responses from survey respondents included:

- 77% said rents were too high
- 75% said it cost too much to buy a home
- 49% found it difficult or very difficult to find affordable housing that met their needs
- 74% experienced one or more difficulties finding or affording housing
- 76% were directly impacted or knew someone affected by housing costs and availability
- 8% experienced threats of eviction or foreclosure
- 7% experienced discrimination in housing
- 14% had been forced to move due to costs, eviction, or foreclosure
- 82% said government agencies should work together to address the need for housing
- 64% said government agencies should do more to provide housing not being delivered by the market
- 80% said that more housing, if done well, was likely to make their community better

- 58% agreed that middle housing, such as triplexes, should be allowed in single-family zones if these buildings meet all of the standards of the zone
- 66% said their community needed more diverse and affordable types of housing
- 74% preferred new housing to be in walkable neighborhoods near town centers rather than further from existing centers

2 – Requirements for the Housing Element Update

A – How All the Parts Are Related



B – Growth Management Act

Housing Goal

The state Growth Management Act (Chapter 36.70A Revised Code of Washington (RCW)) requires that the City demonstrate that each Element in its Comprehensive Plan meets the relevant fifteen planning goals contained within the Act. The fifteen goals guide the development and adoption of the City's Comprehensive Plan and development regulations.

The following is a summary of how the updated Housing Element will need to meet the housing goal of the Growth Management Act. The housing goal was substantially updated in 2022 by the state legislature.

4. **Housing.** *Plan for and accommodate housing affordable to all economic segments of the population of this state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock.*

How affordable housing will be accommodated for all economic classes will be specifically set forth in the Housing Element of the Comprehensive Plan. The Housing Element plays a role in working with the Land Use Element to allocate sufficient land to insure an adequate supply of buildable land for housing serving each economic class. Each residential land use designation, including the Mixed Use designation, will provide a variety of housing types at varying densities. Each Neighborhood subarea will also need to contain sufficient variability in housing types to ensure housing needs can be met for all segments of the City's population for the next 20 years. It is expected that the 2021 Tumwater Housing Action Plan will inform the update of the Land Use and Housing Elements. The goals, policies, and actions of the current Housing Element are found in Appendix B of this staff report.

Requirements for Housing Elements

In addition to the housing goal, the City's Housing Element will need to address the following state Growth Management Act requirements from RCW 36.70A.070 as substantially amended in 2023 to ensure the vitality and character of established residential neighborhoods.

1. Include an inventory and analysis of existing and projected housing needs that identifies the number of housing units necessary to manage projected growth, as provided by the State Department of Commerce, including:
 - a. Units for moderate, low, very low, and extremely low-income households; and
 - b. Emergency housing, emergency shelters, and permanent supportive housing;
2. Include a statement of goals, policies, objectives, and mandatory provisions for the preservation, improvement, and development of housing, including single-family residences, and moderate density housing options including, but not limited to, duplexes, triplexes, and townhomes;
3. 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 consideration of duplexes, triplexes, and townhomes;
4. Make adequate provisions for existing and projected needs of all economic segments of the community, including:
 - a. Incorporating consideration for low, very low, extremely low, and moderate-income households;

- b. Documenting programs and actions needed to achieve housing availability including gaps in local funding, barriers such as development regulations, and other limitations;
 - c. Consideration of housing locations in relation to employment location; and
 - d. Consideration of the role of accessory dwelling units in meeting housing needs;
- 5. Identify local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing, including:
 - a. Zoning that may have a discriminatory effect;
 - b. Disinvestment; and
 - c. Infrastructure availability;
- 6. Identify and implement policies and regulations to address and begin to undo racially disparate impacts, displacement, and exclusion in housing caused by local policies, plans, and actions;
- 7. Identify areas that may be at higher risk of displacement from market forces that occur with changes to zoning development regulations and capital investments; and
- 8. Establish antidisplacement policies, with consideration given to the preservation of historical and cultural communities as well as investments in low, very low, extremely low, and moderate-income housing; equitable development initiatives; inclusionary zoning; community planning requirements; tenant protections; land disposition policies; and consideration of land that may be used for affordable housing.

The adoption of nonproject actions taken that increase housing capacity, increase housing affordability, and mitigate displacement as required under RCW 36.70A.070, and that apply outside of critical areas, are not subject to administrative or judicial appeal under SEPA unless the adoption of the nonproject actions has a probable significant adverse impact on fish habitat.

The full text of the state requirements for the Housing Element from WAC 365-196-410 is found in Appendix C of this staff report

In addition to the state requirements in WAC 365-196-410, the City will need to address new state legislation regarding accessory dwelling units and conversion of existing commercial or office uses to residential uses.

C – County-Wide Planning Policies – Affordable Housing

The Growth Management Act requires that Thurston County and the other jurisdictions within the County coordinate their plans and make them consistent. The framework for this coordination is known as County-Wide Planning Policies, which was developed by Thurston County in collaboration with its cities and towns in 1992 and last amended in 2015. The Policies

are used to frame how the Comprehensive Plans of Thurston County and its seven cities and towns will be developed and coordinated.

The County-Wide Planning Policies cover a number of topics including urban growth areas, economic development, transportation, and coordination between the jurisdictions. It is expected that the Policies will be amended again after the Update process is complete to address new state requirements.

The specific County-Wide Planning Policies related to housing include the following:

I. GENERAL POLICIES

- 1.10 Meet basic human needs of clean water and air, healthy food, adequate housing, quality education, public safety, and equal access, regardless of socio-economic status.*

VIII. AFFORDABLE HOUSING

- 8.1 Increase housing choices to support all ranges of lifestyles, household incomes, abilities, and ages. Encourage a range of housing types and costs that are commensurate with the employment base and income levels of jurisdictions' populations, particularly for low, moderate and fixed income families.*
- 8.2 Accommodate low and moderate income housing throughout each jurisdiction rather than isolated in certain areas.*
- 8.3 Explore ways to reduce the costs of housing.*
- 8.4 Establish and maintain a process to accomplish a fair share distribution of affordable housing among the jurisdictions.*
- 8.5 Work with the private sector, Housing Authority, neighborhood groups, and other affected citizens, to facilitate the development of attractive, quality, low and moderate income housing that is compatible with the surrounding neighborhood and located within easy access to public transportation, commercial areas and employment centers.*
- 8.6 Regularly examine and modify policies that pose barriers to affordable housing.*
- 8.7 When possible, provide assistance in obtaining funding and/or technical assistance for the expansion or establishment of low cost affordable housing for low, moderate and fixed income individuals and families.*

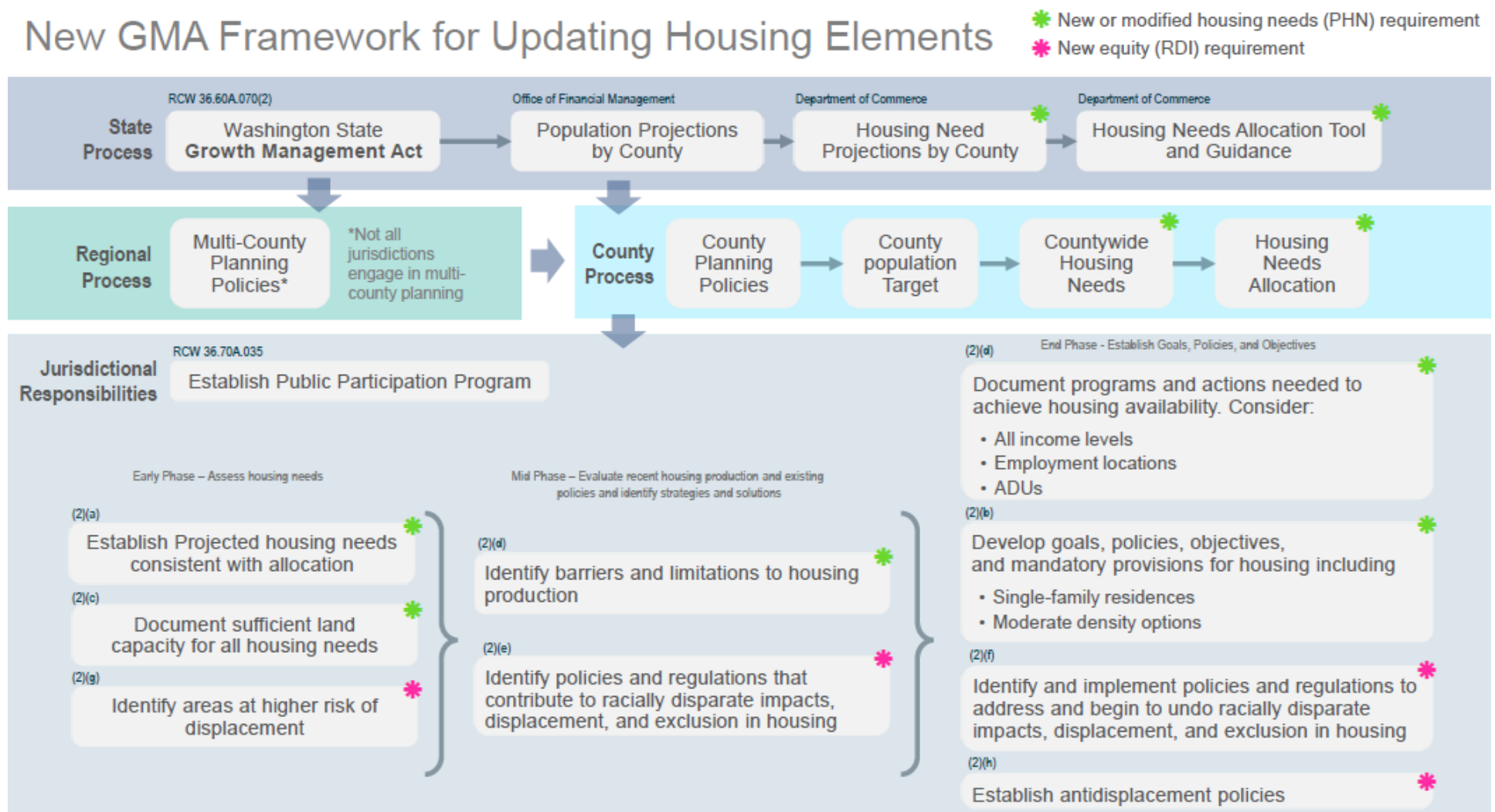


Figure 2. State Department of Commerce.

D – Other Related State Housing Laws

Washington Housing Policy Act

The Washington Housing Policy Act (RCW 43.185B.007 (1993 and amended 2004)) states:

It is the goal of the state of Washington to coordinate, encourage, and direct, when necessary, the efforts of the public and private sectors of the state and to cooperate and participate, when necessary, in the attainment of a decent home in a healthy, safe environment for every resident of the state.

[...]

The objectives of the Washington housing policy act shall be to attain the state's goal of a decent home in a healthy, safe environment for every resident of the state by strengthening public and private institutions that are able to:

- (1) Develop an adequate and affordable supply of housing for all economic segments of the population, including the destitute;*
- (2) Identify and reduce the causal factors preventing the state from reaching its goal;*
- (3) Assist very low-income and special needs households who cannot obtain affordable, safe, and adequate housing in the private market;*
- (4) Encourage and maintain homeownership opportunities;*
- (5) Reduce life-cycle housing costs while preserving public health and safety;*
- (6) Preserve the supply of existing affordable housing;*
- (7) Provide housing for special needs populations;*
- (8) Ensure fair and equal access to the housing market;*
- (9) Increase the availability of mortgage credit at low interest rates; and*
- (10) Coordinate and be consistent with the goals, objectives, and required housing element of the comprehensive plan in the state's growth management act in RCW 36.70A.070.*

E – Sustainable Thurston Goals

The Sustainable Thurston project began in early 2011 with question for the Thurston Region's residents: “How do you want your community to look, function, and feel in 2035?”

Online and in person, a thousand of engaged residents helped the Sustainable Thurston Task Force craft a regional vision of sustainable development that encompassed land use, housing, energy, transportation, food, health, and other interconnected issues.

Creating Places — Preserving Spaces: A Sustainable Development Plan for the Thurston Region was intended to integrate sustainability into all regional decision-making to achieve a healthy economy, society, and environment.

Tumwater adopted as part of the Housing Element the following Sustainable Thurston housing goals:

1.4.3 Housing Goals

- H-1: Improve regulatory clarity and predictability to encourage urban infill and redevelopment.*
- H-2: Increase housing amid urban corridors and centers to meet the needs of a changing population.*
- H-3: Provide sufficient housing for low and moderate income households within each jurisdiction.*
- H-4: Maximize opportunity to redevelop land in priority areas by investing in infrastructure and environmental remediation.*
- H-5: Provide sufficient service enriched housing for homeless and high-risk populations*
- H-6: Encourage housing density and diversity in neighborhoods to add vibrancy and increase equitable access to opportunity.*
- H-7: Encourage the construction, weatherization, and operation of homes to boost energy efficiency.*

3 – Racially Disparate Impacts

As part of its Comprehensive Plan update, the City must now do the following:

1. Identify local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing, including:
 - a. Zoning that may have a discriminatory effect;
 - b. Disinvestment; and
 - c. Infrastructure availability;
2. Identify and implement policies and regulations to address and begin to undo racially disparate impacts, displacement, and exclusion in housing caused by local policies, plans, and actions;
3. Identify areas that may be at higher risk of displacement from market forces that occur with changes to zoning development regulations and capital investments; and
4. Establish anti-displacement policies, with consideration given to the preservation of historical and cultural communities as well as investments in low, very low, extremely low, and moderate-income housing; equitable development initiatives; inclusionary

zoning; community planning requirements; tenant protections; land disposition policies; and consideration of land that may be used for affordable housing.

The State Department of Commerce released the final version of the *Racially Disparate Impacts Guidance* April 2023. The Guidance offers recommendations on how the City's Housing Element might be updated to address new Growth Management Act requirements regarding racially disparate impacts, displacement, exclusion and displacement risk.

Addressing the new housing element requirements warrants recognition that the City's current housing is the product of many forces including policy, regulations, macroeconomic changes, lending practices, cost of development, and individual preference.

Land use and related policies contribute to the City's housing conditions as they can impact who has access to "areas of opportunity" in our communities, including access to healthy environments, safety, recreational opportunities, education, jobs, nutrition and other basic needs. Land use decisions also shape the cost to produce housing, by defining the types and sizes of homes that can be built. These constraints affect the affordability and accessibility of housing for different households, and more specifically, determining if and where households can live within a community, based on their income.

Increasing housing supply and opportunity, specifically at prices affordable to Black, Indigenous, and People of Color (BIPOC) households, is one approach to reduce equity-related effects that discriminatory practices have created. Examples of these effects include:

- Past practices like redlining and restrictive covenants have denied many minorities and low-income households the opportunity to share in wealth building offered by homeownership, resulting in lasting racial and economic inequities seen today.
- Homeownership is out of reach of many minorities and low-income households, making these households particularly vulnerable to housing insecurity and displacement caused by rising rents.
- Higher poverty rates in certain minority neighborhoods have contributed to disinvestment of capital, businesses, and services from these neighborhoods.
- Compared to wealthier neighborhoods, residents in lower income and minority neighborhoods often are less engaged and less represented in local government processes and decisions that directly affect their neighborhoods and quality of life.

As part of the update, the City is required to review any history of racially disparate impacts, exclusion, and displacement, and take actions to begin to undo patterns of racial segregation and exclusion in land use policy making. Most directly, land use decisions shape the cost to produce housing, and thus the affordability and accessibility of housing for different households. The City's review and updates to housing policies and regulations will seek to provide equitable opportunity for safe and healthy housing for all members of the community.

The Guidance recommends that the Housing Element update process include, among other items, an evaluation of data and policies, as well as community engagement, following the steps below.



Figure 3. State Department of Commerce.

To assist the City on the data evaluation component, the State Department of Commerce will be issuing a Racially Disparate Impact Data Toolkit. This Toolkit will provide the City with a base level of data to use in its analysis, particularly in identifying racially disparate impacts and exclusion.

Information on the following data parameters will be available in the Toolkit, which will include comparative data for Thurston County:

- Racial composition (2015 and 2020)
- Cost burden by race and tenure (2019)
- Rental housing affordability by income categories (2019)
- Households by income and race (2019)
- Owner and renter households by racial group (2019)

At this time, the Toolkits are only available to jurisdictions in King, Pierce, Snohomish and Kitsap Counties, as these counties and their cities and towns have a December 31, 2024 periodic update deadline. Similar information will eventually be provided to other local jurisdictions in the State, as they get closer to their respective periodic update deadlines.

4 – Housing Action Plan

The City Council adopted the Tumwater Housing Action Plan in 2021. The Plan is intended to inform the City's Comprehensive Plan policies and development regulations and to guide implementation strategies to help the City meet its housing needs and strategic objectives.

The Plan built on the affordable housing work the City had started in 2018. It was the next step in the process of identifying actions to increase the amount of affordable housing in the City. The Plan consolidated all affordable housing action items into one document that the City uses to support the development of more affordable housing in the City.

The Housing Action Plan will be used to support the update of the Housing Element.

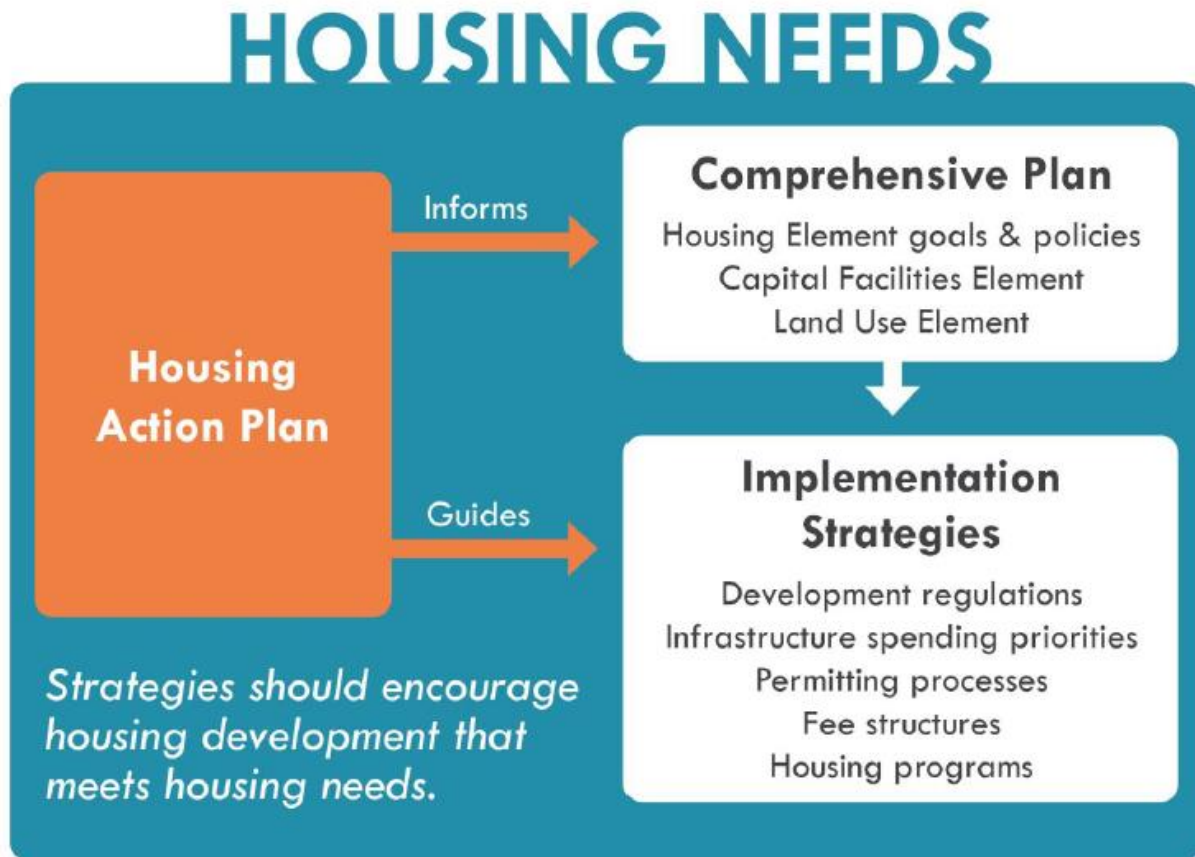


Figure 4. State Department of Commerce and BERK

5 – Current Housing Element

A – Background

The 2016 Housing Element of the Comprehensive Plan was prepared in accordance with the requirements of the Growth Management Act, adopted Thurston County-Wide Planning Policies, and Sustainable Thurston Policies and Actions.

The 2016 Housing Element covered the 20-year planning period from 2015 to 2035. The Housing Element of the Comprehensive Plan was last fully updated in 2016 and amended in 2021.

The goals, policies, and actions of the current Land Use Element are found in Appendix B of this staff report.

B – Structure

The current Housing Element consists of the following parts:

1. Introduction
 - 1.1 Introduction, including Table of Foundational Plans and Data
 - 1.2 Growth Management Act Goals Compliance
 - 1.3 County-Wide Planning Policy Compliance
 - 1.4 Sustainable Thurston Goals
 - 1.4.1 Priority Goals
 - 1.4.2 Community Goals
 - 1.4.3 Housing Goals
 - 1.5 Affordable Housing Definition
 - 1.6 Ongoing Review Program
 - 1.7 Amendments
 2. Existing Housing Distribution
 - 2.1 Introduction
 - 2.2 Housing Pattern
 - 2.3 Housing Trends and Projections
 3. Existing Housing Investment Profile
 - 3.1 Introduction
 - 3.2 Federal and State Housing Financing Programs
 - 3.3 Local Financing
 - 3.4 Conclusion
 4. Affordable Housing Needs
 - 4.1 Introduction
 - 4.2 Emergency Shelters and Transitional Housing
 - 4.3 Private Subsidized Housing
 - 4.4 Publicly Subsidized Housing
 - 4.5 Low and Moderate Income Definitions
 - 4.6 Housing Needs Gaps and Coordination Points
 - 4.7 Homelessness
 - 4.8 Conclusion
 5. Housing Goals, Policies, and Actions
 - 5.1 Housing Goals, Policies, and Actions
-

6. Regulatory Barrier Assessment

- 6.1 Introduction
- 6.2 Community Perceptions
- 6.3 Growth Management
- 6.4 Permitting
- 6.5 Infrastructure
- 6.6 Zoning Code
- 6.7 Building Code
- 6.8 Conclusion

7. Citywide Housing Needs

- 7.1 Introduction
- 7.2 Housing Needs
- 7.3 Conclusion

8. Sufficient Land for Housing

- 8.1 Introduction
- 8.2 Identification of Expected Population
- 8.3 Identification of Sufficient Land for Housing
- 8.4 Sufficient Land for Specific Housing Needs
 - 8.4.1 Government Assisted Housing
 - 8.4.2 Housing for Low Income People
 - 8.4.3 Manufactured Housing
 - 8.4.4 Multi-Family Housing
 - 8.4.5 Group and Foster Care Homes
- 8.5 Vacancy Rates
- 8.6 Conclusion

9. Existing and Future Housing Provisions

- 9.1 Introduction
 - 9.2 Protection of Existing Housing Stock
 - 9.3 Low and Moderate Income Provisions
 - 9.4 Regulatory Barriers to Affordable Housing
 - 9.5 Sufficient Land for 20 Years of Housing
-

- 9.6 Employment
 - 9.6.1 Thurston County Employment Base
- 9.7 Unemployment
- 9.8 Conclusion

C – Link to Current Housing Element

<https://www.ci.tumwater.wa.us/departments/community-development-department/tumwater-comprehensive-plan>

6 – Schedule

Phase 1 – Community Engagement (Summer 2023 – Fall 2023)

Staff is reviewing the visions, goals, and policies in the existing Housing Element and preparing a gap analysis. The community and stakeholders will be introduced to the periodic update process through a series of communications and asked to prioritize the Comprehensive Plan's vision, goals, and policies through a variety of media outreach methods, including surveys, utility inserts, open houses, informal meetings, presentations, and social media. The review is being guided by the State Department of Commerce Guidance Materials found in Appendix A of this staff report.

1) Gap Analysis

- Start July 2023, finish September 2023
- Process that will be followed:
 1. Review the following in the current Housing Element:
 - Goals, policies, and actions
 - Consider how current Housing Element goals and policies are working:
 - Have the City implemented the policies in the Element?
 - Are the City's policies working?
 - Should we consider removing or updating existing policies as the Element is updated?
 - Technical information
 - Review progress in meeting housing targets, or objectives for housing types.
 2. Use the following materials:
 - State Department of Commerce Periodic Update Checklist

- *Periodic Update Checklist for Fully Planning Cities* (Commerce, March 2023)
 - *A Guide to the Periodic Update Process Under the Growth Management Act – Fully-Planning Counties & Cities* (Commerce, 2022)
 - State Department of Commerce Periodic Update Materials
 - *Establish Housing Targets for Your Community* (Commerce, July 2023)
 - *Guidance to Address Racially Disparate Impacts* (Commerce, April 2023)
 - *Guidance for Updating Your Housing Element* (Commerce, 2022)
 - *Missing Middle*
 - *Frequently Asked Questions about Middle Housing* (Commerce, May 2023)
 - *Middle Housing in Washington: Fact Sheet for Implementing E2SHB 1110* (Commerce, May 2023)
 - *Planning for Housing in Washington* (Commerce, March 2023)
 - *Quick Guide to Washington State Agencies* (Commerce, 2023)
 - *Growth Management Act Amendments 1995-2023* (Commerce, 2023)
 - *Housing Memorandum: Issues Affecting Housing Availability and Affordability* (Commerce, June 2019)
 - 2022-23 State Legislation
 - Housing (HB 1220/ESHB 1042/E2SHB 1110/ESHB 1293/EHB 1337)
 - Missing Middle (E2SHB 1110)
 - Capacity (HB 1220)
 - ADUs (EHB 1337)
 - Design Standards (ESHB 1293)
 - Impact Fees for Construction of Smaller Residential Units (SB 5258)
 - Impact Fee Study for Bicycle and Pedestrian Facilities (SB 5442)
 - Organic Materials Management (E2SHB 1799)
 - Project Permit Review (2SSB 5290)
 - SEPA (SSB 5818/2SSB 5412)
 - Plan Adopted by the City since 2016
 - Tumwater Housing Action Plan
 - Specific Plans from Agencies Outside the City
2. Identify what needs to be updated or added to the following:

- Goals, policies, and actions
- Technical information
- Appendices

2) Data Collection

- Start July 2023, finish Spring 2024
- TRPC Population Projections – Likely ready by December 2023
- TRPC Housing Projections – Likely ready by December 2023

3) Schedule

- Initial Community Outreach
 - July 2023 – December 2023
- Data Collection
 - Completed by Spring 2024
- Gap Analysis
 - Completed by September 2023
- State Department of Commerce Grants and Contracting
 - Completed by Fall 2023
- Internal Coordination Meetings
 1. General City Department Coordination Meeting
 - September 25, 2023
- General Comprehensive Plan Meetings
 1. Update Check In
 - City Council Worksession
 - October 24, 2023
 - Joint City Council – Planning Commission Meeting
 - December 12, 2023
- Initial Housing Element Meetings – Goals, Policies, and Actions
 1. Planning Commission Worksessions
 - August 22, 2023
 - September 26, 2023
 2. General Government Committee Briefing
 - September 13, 2023

- Coordination with Other Jurisdictions and Agencies, starting September 2023
 1. Thurston County
 2. City of Olympia
 3. Intercity Transit
 4. LOTT
 5. Port of Olympia
 6. Thurston Regional Planning Council

4) Specific Topics Addressed as Part of the Update

- Incorporate consideration of Diversity, Equity, and Inclusion throughout
 1. Environmental Justice
 - Special consideration for environmental justice in goals and policies (E2SHB 1181)
- Comprehensive Plan Update
 1. General
 - Create a new format for the Comprehensive Plan that will be shorter, leaner, and more user friendly. The updated Comprehensive Plan will consist of shorter individual Elements and Plans with appendices that contain the required technical information.
 - Use the new Community Outreach Plan for the periodic update process.
 - Create a new Comprehensive Plan Goal and Policy Guide for use by staff and policymakers.
 - Create a new User Guide to the Comprehensive Plan.
 - Create a new Glossary for the Comprehensive Plan.
 - The County-Wide Planning Policies (2015) will not be revised for the 2025 periodic update.
 - Ensure that the updated Comprehensive Plan is internally consistent.
 - Ensure that all the Elements and Plans are consistent with County-Wide Planning policies, the Growth Management Act, coordinated with the Plans of adjacent jurisdictions, individual Elements and Plans, and the future land use map.
 - Update all maps that are a part of the Comprehensive Plan, including the City-Wide Land Use Map and all maps in the individual Elements and Plans.
 - Update all the appendices in the Comprehensive Plan.

- Review entire Plan to address the use of terms such as “neighborhood character,” stability, and similar terms in support of the Tumwater Housing Action Plan as part of Planning Commission’s 2022 Comprehensive Plan amendment cycle recommendations.
- Provide for a mutually agreeable Memorandum of Agreement between the City and tribes about collaboration and participation in the planning process unless otherwise agreed at the end of a mediation period.
- Provide for consideration for preserving property rights. The City must evaluate proposed regulatory or administrative actions to assure that such actions do not result in an unconstitutional taking of private property
- Update list of all adopted Plans.
- Update City strategic priorities.
- Revise planning period to 2025 – 2045.
- Update discussion of Growth Management Act goals.
- Add references to the updated Shoreline Master Program (2019) and Economic Development Plan (2019) and the new Tumwater Housing Action Plan (2021), Thurston Climate Mitigation Plan (2021), and Urban Forestry Management Plan (2021).
- Simplify, reduce, and update goals, policies, and actions.

2. Housing Element

- Update goals, policies, and actions for the preservation, improvement, and development of housing.
- Revise to consider of housing locations in relation to employment locations and the role of accessory dwelling units.
- Revise inventory and analysis of existing and projected housing needs over the planning period, by income band, consistent with the jurisdiction’s share of housing need, as provided by the State Department of Commerce.
- Revise to include adequate provisions for existing and projected housing needs for all economic segments of the community.
- Revise identification of 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.
- Identify local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing, including zoning that may have a discriminatory effect, disinvestment, and infrastructure availability.

- Establish policies and regulations to address and begin to undo racially disparate impacts, displacement, and exclusion in housing caused by local policies, Plans, and actions.
- Identify areas that may be at higher risk of displacement from market forces that occur with changes to zoning development regulations and capital investments.
- Establish anti-displacement policies, with consideration given to the preservation of historical and cultural communities as well as investments in low, very low, extremely low, and moderate-income housing; equitable development initiatives; inclusionary zoning; community planning requirements; tenant protections; land disposition policies; and consideration of land that may be used for affordable housing.
- Update information on federal, State, and local financing programs.
- Update housing services provided by public and private service agencies.
- Update information on housing needs gap.
- Consider policies to support rental and residential inspections programs.
- Update regulatory barrier assessment, citywide housing needs, and existing and future housing needs to year 2045.
- Incorporate provisions of the updated 2023 Hazard Mitigation Plan as appropriate.
- Address Regional Housing Council and Five-Year Thurston County Homeless Plan

Phase 2 – Plan Development (Winter 2024 – Fall 2024)

Feedback gathered through the community outreach process will be incorporated into the draft Housing Element. Staff will present the drafts to the Planning Commission and General Government Committee as well as external and internal stakeholders and focus groups comprised of subject-area experts for review.

1) Community Outreach

- Intermediate Actions:
 - To be determined based the results of Phase 1 and the Community Outreach Plan.

2) Schedule

- Continuing Community Outreach – January 2024 –June 2024
- Housing Element Development Meetings
 1. Includes Appendices, Maps, and Subarea Plans

2. Planning Commission Worksessions

- March 12, 2024
- April 23, 2024
- September 24, 2024

3. General Government Committee Briefings

- May 8, 2024
- November 13, 2024

▪ State Department of Commerce Preliminary Review

- Review of Comprehensive Plan Format
 - March 2024

▪ Complete Draft of Comprehensive Plan

- All Elements, Maps, and Appendices
- July 2024 – October 2024

Phase 3 – Legislative Process (Fall 2024 – June 30, 2025)

Staff will complete a draft version of the Comprehensive Plan during Phase III. Staff will present the draft to the Planning Commission and General Government Committee as well as external and internal stakeholders for review.

The Planning Commission will hold a number of worksessions to discuss the Comprehensive Plan and then conduct a public hearing to gather formal public comment on the draft Comprehensive Plan before developing findings of fact, conclusions, and recommendations that will be forwarded to City Council.

The City Council will hold a number of worksessions to discuss the Comprehensive Plan. The City Council will consider the recommendation forwarded by the Planning Commission.

The process will culminate in the adoption of an updated Comprehensive Plan by the Growth Management Act deadline of June 30, 2025.

1) Community Outreach

- Final Actions:
 - To be determined based the results of Phase 2 and the Community Outreach Plan.

2) Schedule

- State Department of Commerce Review

- Fall 2024 – Winter 2025
- Prepare Comprehensive Plan Update Ordinance
 - October 2024
- SEPA Review
 - November 2024 – December 2024
- State Department of Commerce Notice of Intent
 - November 2024 - December 2024
- Public Adoption Meetings
 1. Planning Commission
 - Briefing
 - November 26, 2024
 - Worksession
 - December 10, 2024 (Joint with City Council)
 - January 14, 2025
 - February 11, 2025
 - Public Hearing
 - February 25, 2025
 2. General Government Committee
 - Briefing for Comprehensive Plan Update Ordinance
 - March 12, 2025
 3. City Council Worksession
 - December 10, 2024 (Joint with Planning Commission)
 - April 15, 2025
 - May 27, 2025
 4. City Council
 - June 17, 2025
- Notice of Adoption
 1. Submit Notice of Adoption to the State Department of Commerce
 2. June 30, 2025

Appendix A –Resources and Guidance

1. City of Tumwater

[2025 Comprehensive Plan Update | City of Tumwater, WA](#) contains links to guidance material and information about the update.

2. State Department of Commerce

a) General Guidance

The State Department of Commerce has provided guidance specific to the periodic update on their Periodic Update webpage.

<https://www.commerce.wa.gov/serving-communities/growth-management/periodic-update/>

www.commerce.wa.gov/serving-communities/growth-management/growth-management-topics

The State Department of Commerce has prepared a general webinar on the periodic update process.

[Periodic Update Workshop Kickoff](#)

b) Housing Guidance

The State Department of Commerce's Growth Management Act Housing Element webpage contains guidance on planning for housing under the Growth Management Act, including the new requirements established by House Bill 1220 (2021).

[Updating GMA Housing Elements - Washington State Department of Commerce](#)

The State Department of Commerce has prepared a number of webinars on how to address the new requirements.

[Guidance and Data for Updating Housing Elements: Implementing HB 1220](#)

[Guidance and Data for Updating Housing Elements: Land Capacity Analysis and Adequate Provisions](#)

[Updating your Housing Element: Racially Disparate Impacts Training](#)

[Talking Race for Planners Toolkit](#)

The State Department of Commerce maintains an Affordable Housing Planning Resource webpage contains a number of useful resources related to housing issues.

[Affordable Housing Planning Resources](#)

The State Department of Commerce recently released a number of materials related to missing middle housing and accessory dwelling units.

[Planning for Middle Housing](#)

3. Puget Sound Regional Council

The Puget Sound Regional Council as conducted a series of workshops on a variety of topics related to the periodic update.

www.psrc.org/our-work/passport-2044-comprehensive-plan-workshop-series

4. Municipal Research Services Center

Municipal Research Services Center has a Comprehensive Planning webpage.

<https://mrsc.org/getdoc/d7964de5-4821-4c4d-8284-488ec30f8605/Comprehensive-Planning.aspx>

And prepared held a webinar on updating a Housing Element

[MRSC Webinar on Housing Elements](#)

Appendix B – Current Housing Goals, Policies, and Actions

1. Goals, Policies, and Actions in General

Goals and policies describe how the City proposes to address identified needs. Goals are statements of desired outcomes or intended achievements. Policies are specific statements that guide actions and provide a framework for future decision-making. Actions are specific implementations of goals and policies.

Example from the current Housing Element:

GOAL H-1: To conserve and improve the existing city housing stock and quality of life of neighborhoods.

Policy

Action

H-1.1

Assist city neighborhoods in maintaining and rehabilitating the existing housing stock as decent, safe, sanitary, and affordable housing.

H-1.1.1

Create a formal maintenance and rehabilitation program beyond the current City code enforcement procedures to support Policy H-1.1 in coordination with the City's work with the Regional Housing Council.

How key terms are used in goals, policies, and actions:

- “Shall” means implementation of the policy is mandatory and imparts a higher degree of substantive direction than “should”.
- “Should” means implementation of the policy is expected but its completion is not mandatory.
- “May” means the actions described in the policy are either advisable or are allowed.
- “Ensure” means actions described in the policy are guaranteed.
- “Must” means implementation of the policy is an obligation.
- “Require” means implementation of the policy is compulsory.
- “Support” means to advocate for implementation of the policy.
- “Promote” means to help bring about implementation of the policy.
- “Encourage” means to foster or help implementation of the policy.
- “Consider” means to take into account.

When developing goals and policies, it is important to understand the policy strength continuum. The following example was developed by the Puget Sound Regional Council.

Passive	Policy Strength	Active
Statements of Inclination Conveys intent, but establishes no target or definition of success	Statements of Principle Describes clear targets or conditions of success	Statements of Impact Go further, describing specific situations where housing is a priority
Example The City shall encourage expeditious and efficient infill development.	Example The City shall endeavor to process completed development applications with 120 days.	Example Work with public and private developers to support housing for income groups under 80% AMI.

2. Current Housing Element

The Housing Element contains goals, policies, and actions meant to set forth a direction for how housing will be provided and maintained in the City based on its 20-year community vision. The goals, policies, and actions ensure coordination with the Comprehensive Plan Elements, Sustainable Thurston, and County-Wide Planning Policies.

The current Housing Elements goals, policies, and actions, found in Section 5.1 of the Housing Element include the following.

GOAL H-1: To conserve and improve the existing city housing stock and quality of life of neighborhoods.

<u>Policy</u>	<u>Action</u>
H-1.1	Assist city neighborhoods in maintaining and rehabilitating the existing housing stock as decent, safe, sanitary, and affordable housing.
	H-1.1.1 Create a formal maintenance and rehabilitation program beyond the current City code enforcement procedures to support Policy H-1.1 in coordination with the City's work with the Regional Housing Council.
H-1.2	Encourage a range of housing, economic development, and community revitalization in the city.
H-1.3	Promote the quality of life of existing communities and implementation of community housing goals through the preparation of comprehensive plans and the development review process.
H-1.4	Provide assistance to improve community surroundings and infrastructure in residential areas.

- H-1.5 Encourage and facilitate economic development as an important part of provision of housing by providing jobs.
- H-1.5.1 Continue implementation of economic development efforts to provide jobs in Tumwater.

GOAL H-2: To provide a sufficient number of single family dwelling units, multi-family dwelling units, manufactured homes, and group housing to provide an affordable selection of housing to each economic segment of the Tumwater population.

<u>Policy</u>	<u>Action</u>
H-2.1	Provide sufficient, suitably zoned land for development of all housing types to accommodate the future needs for each type of housing, including single-family detached dwellings, accessory dwelling units, townhouses, duplexes, triplexes, fourplexes, multi-family dwellings, cottage housing, senior housing, roominghouses, group housing, and manufactured homes in manufactured home parks and on single lots.
H-2.2	Provide opportunities for a range of housing types to provide for all economic segments of Tumwater's population.
H-2.2.1	Monitor the Land Use Element and Zoning Code to ensure an adequate supply of suitably zoned land.

GOAL H-3: To provide adequate, affordable housing for residents of all income groups, including sufficient housing affordable to low and moderate-income groups.

<u>Policy</u>	<u>Action</u>
H-3.1	Encourage the development of innovative plans, codes, standards, and procedures in order to take advantage of new private and public sector approaches to housing provision.
H-3.1.1	The Zoning Code allows manufactured homes on single-family lots in all residential zones. It is the intent of the Housing Element to promote the designation of a sufficient supply of land for traditional mobile/manufactured home parks and to recognize that modular/manufactured housing on single family lots and in manufactured home parks is a viable form of housing construction.
H-3.1.2	Increase code enforcement efforts and build public private partnerships to encourage renovations of unfit structures for use as transitional or affordable housing.
H-3.2	Encourage provision of adequate building sites through appropriate land use planning and zoning codes, infrastructure supply, and overall regulatory climate.

H-3.3 Tumwater should assume its "fair share" of housing for low and moderate income groups, in cooperation with other jurisdictions in Thurston County.

H-3.3.1 Monitor land supply, census data, and housing policies to ensure Tumwater accommodates its fair share of housing for low and moderate income groups.

H-3.3.2 Work with Tumwater School District, Housing Authority, and other agencies and organizations to pursue grant funding and implement transitional housing strategies for families with children.

H-3.3.3 Establish a multi-family tax exemption program that gives financial incentive for developers to create multi-family structures in target areas and to set aside a percentage of units as low-income housing.

H-3.4 Tumwater should work with the other jurisdictions in Thurston County as part of the Regional Housing Council to share decision making responsibilities related to homelessness and affordable housing in Thurston County to allow for collaboration in expanding affordable housing options and sharing the planning for, identification of, and resource allocation to activities and programs intended to support individuals experiencing homelessness in Thurston County.

GOAL H-4: To provide adequate opportunities for housing for all persons regardless of age, race, color, national origin, ancestry, sex, sexual orientation, familial status, marital status, ethnic background, source of income use of federal housing assistance, or other arbitrary factors.

Policy

Action

H-4.1 Support the inclusion of living opportunities for families with children throughout the city.

H-4.2 Support and encourage a variety of housing types and price ranges through appropriate policies and regulations.

H-4.2.1 Continue the requirement for reasonable maximum lot sizes in order to create smaller lots that are more affordable and that allow a more efficient use of City services.

H-4.2.2 Encourage homeowner associations to adopt Covenants, Conditions, and Restrictions (CCRs) consistent with this policy.

GOAL H-5: To supply sufficient, safe, suitable housing sites and housing supply to meet projected future housing needs for Tumwater over the next 20 years.

Policy

Action

H-5.1 Ensure appropriate land use designations and Zoning Code designations to provide sufficient land for housing construction.

- H-5.1.1 Monitor the Land Use Element and Zoning Code to ensure an adequate supply of suitably zoned vacant land. (2.1.1)
- H-5.1.2 Continue joint planning with Thurston County to plan for future growth in Tumwater.
- H-5.2 Lands not suitable for development due to site constraints such as wetlands, steep slopes, geologically hazardous areas, etc., should be identified and considered when determining sufficient land for new housing in accordance with Tumwater's Conservation Plan.
- H-5.3 Encourage construction practices, which exceed minimum standards. Tumwater will support the use of alternative building designs and methods that exceed the minimum standards set by Tumwater.

GOAL H-6: **To promote a selection of housing that is decent, safe, and sound, in close proximity to jobs and daily activities, and varies by location, type, design, and price.**

Policy

Action

- H-6.1 Protect residential areas from undesirable activities and uses through aggressive enforcement of adopted City codes.
- H-6.2 Provide for a dynamic mix of residential land uses and zones in order to create a diverse mix of sites available for different housing types.
 - H-6.2.1 Continue to monitor the available land supply, census data, and City policies to ensure a diverse mix of land for residential housing stock.
 - H-6.2.2 Continue to implement innovative design techniques, such as zero lot line developments, architectural design standards, alley houses, and attached single-family housing. Zero lot line developments are residential real estate in which the structure comes up to or very near to the edge of the property. Zero-lot-line houses are built very close to the property line in order to create more usable space.
- H-6.3 Support increasing housing opportunities along urban corridors and centers.
- H-6.4 Encourage provision of affordable housing near public transit routes to promote efficient transportation networks.
 - H-6.4.1 Continue to involve Intercity Transit in Tumwater's development review process.
- H-6.5 Tumwater will maintain current Building Code standards and will use the most up to date future Code editions.
- H-6.6 Increase the variety of housing types outside of corridors and centers of appropriate intensities with supporting design guidelines to meet the needs of a changing population.

GOAL H-7: To ensure that housing is compatible in quality, design, and density with surrounding land uses, traffic patterns, public facilities, and environmentally sensitive areas.

<u>Policy</u>	<u>Action</u>
H-7.1	Support the stability of established residential neighborhoods through appropriate plans and codes.
	H-7.1.1 Continue to implement design standards for multi-family and attached single-family dwellings in order to ensure compatibility with existing neighborhoods.
H-7.2	Assure housing will be well maintained and safe.
H-7.3	Enhance the appearance of and maintain public spaces in residential areas.
H-7.4	Promote community involvement to achieve neighborhood improvement.

GOAL H-8: To support healthy residential neighborhoods which continue to reflect a high degree of pride in ownership or residency.

<u>Policy</u>	<u>Action</u>
H-8.1	Support the stability of established residential neighborhoods.
H-8.2	Assure housing will be well maintained and safe.
	H-8.2.1 Protect residential areas from undesirable activities and uses through aggressive enforcement of adopted City codes.
H-8.3	Enhance the appearance of and maintain public spaces in residential areas.
H-8.4	Promote community involvement to achieve neighborhood improvement.
	H-8.4.1 Encourage neighborhood meetings to discuss community issues as situations and concerns arise.
H-8.5	Encourage home ownership for Tumwater residents.

GOAL H-9: To encourage a variety of housing opportunities for those with special needs, particularly those with problems relating to age or disability.

<u>Policy</u>	<u>Action</u>
H-9.1	Require housing to meet the needs of those with special housing requirements without creating a concentration of such housing in any one area.
H-9.2	Assist social service organizations in their efforts to seek funds for construction and operation of emergency, transitional, and permanent housing.

- H-9.3 Support and plan for assisted housing opportunities using federal, state, or local aid.
- H-9.4 Encourage and support social and health service organizations, which offer support programs for those with special needs, particularly those programs that help people remain in the community.
- H-9.5 Encourage alternative housing strategies for homeless youth, which may include Host Homes.

GOAL H-10: To provide housing that is compatible and harmonious with existing neighborhood character through use of innovative designs that enhance the appearance and quality of Tumwater's neighborhoods.

Policy **Action**

- H-10.1 Encourage innovation and variety in housing design and development. Tumwater will support efforts to build housing with unique individual character, which avoids monotonous neighborhood appearance.
- H-10.2 Multi-family residential housing should be subject to design criteria that relate to density, structure bulk, size and design, landscaping, and neighborhood compatibility.
- H-10.2.1 Continue to implement multi-family housing design standards.

GOAL H-11: To provide housing to accommodate Tumwater's housing needs in the urban growth area and make the most efficient use of infrastructure and services.

Policy **Action**

- H-11.1 Reference the Transportation Element and anticipated transportation impacts when making housing decisions affecting the location and density of housing.
- H-11.2 Reference utility plans and the impact of housing decisions on capital improvements planning.
- H-11.3 Encourage the construction of affordable housing, including cottage housing and accessory dwelling units, within a half mile or twenty minute walk of an urban center, corridor or neighborhood center with access to goods and services to provide access to daily household needs.

GOAL H-12: To encourage urban growth within the city limits with gradual phasing outward from the urban core.

Policy **Action**

- H-12.1 Encourage the construction of housing on vacant property within the city and the redevelopment of underdeveloped property within residential areas to minimize urban sprawl and associated public service costs.
- H-12.1.1 Continue to review and revise, as necessary, City Development Standards deemed unnecessary and make development more expensive and/or difficult.
 - H-12.1.2 Continue to support high-density zoning within specific areas of the city that have the infrastructure and services to support high-density housing.
 - H-12.1.3 Continue to implement minimum density levels for all residential zoning districts to ensure efficient use of the urban growth area.
 - H-12.1.4 Work cooperatively with Thurston County to provide for more efficient and orderly annexations to facilitate urban service delivery.

GOAL H-13: Ensure consistency with RCW 36.70A.070(2)(c) which requires sufficient land be available for all types of housing including manufactured housing.

Policy

Action

- H-13.1 Maintain the manufactured home park district zoning in appropriate areas in order to prevent conversion of affordable housing to other uses without replacement.
- H-13.1.1 Encourage manufactured housing park district zoning to locate near transit services.
- H-13.2 When locating zones and designations for manufactured home parks, carefully consider the risks from natural hazards, such as flooding and liquefaction, and the impacts of those hazards on the future residents of those manufactured home parks, Tumwater's emergency responders, and the city as a whole.

Appendix C – WAC 365-196-410 Housing Element

WAC 365-196-410

Housing element.

(1) Requirements. Counties and cities must develop a housing element ensuring vitality and character of established residential neighborhoods. The housing element must contain at least the following features:

(a) An inventory and analysis of existing and projected housing needs.

(b) A statement of the goals, policies, and objectives for the preservation, improvement, and development of housing, including single-family residences.

(c) Identification of sufficient land for housing including, but not limited to, government-assisted housing, housing for low-income families, manufactured housing, multifamily housing, group homes and foster care facilities.

(d) Adequate provisions for existing and projected housing needs of all economic segments of the community.

(2) Recommendations for meeting requirements. The housing element shows how a county or city will accommodate anticipated growth, provide a variety of housing types at a variety of densities, provide opportunities for affordable housing for all economic segments of the community, and ensure the vitality of established residential neighborhoods. The following components should appear in the housing element:

(a) Housing goals and policies.

(i) The goals and policies serve as a guide to the creation and adoption of development regulations and may also guide the exercise of discretion in the permitting process.

(ii) The housing goals and policies of counties and cities should be consistent with countywide planning policies and, where applicable, multicounty planning policies.

(iii) Housing goals and policies should address at least the following:

(A) Affordable housing;

(B) Preservation of neighborhood character; and

(C) Provision of a variety of housing types along with a variety of densities.

(iv) Housing goals and policies should be written to allow the evaluation of progress toward achieving the housing element's goals and policies.

(b) Housing inventory.

(i) The purpose of the required inventory is to gauge the availability of existing housing for all economic segments of the community.

(ii) The inventory should identify the amount of various types of housing that exist in a community. The act does not require that a housing inventory be in a specific form. Counties and cities should consider WAC 365-196-050 (3) and (4) when determining how to meet the housing inventory requirement and may rely on existing data.

(iii) The housing inventory may show the affordability of different types of housing. It may provide data about the median sales prices of homes and average rental prices.

(iv) The housing inventory may include information about other types of housing available within the jurisdiction such as:

(A) The number of beds available in group homes, nursing homes and/or assisted living facilities;

(B) The number of dwelling units available specifically for senior citizens;

(C) The number of government-assisted housing units for lower-income households.

(c) Housing needs analysis.

(i) The purpose of the needs analysis is to estimate the type and densities of future housing needed to serve all economic segments of the community. The housing needs analysis should compare the number of housing units identified in the housing inventory to the projected growth or other locally identified housing needs.

(ii) The definition of housing needs should be addressed in a regional context and may use existing data.

(iii) The analysis should be based on the most recent 20-year population allocation.

(iv) The analysis should analyze consistency with countywide planning policies, and where applicable, multicounty planning policies, related to housing for all economic segments of the population.

(d) Housing targets or capacity.

(i) The housing needs analysis should identify the number and types of new housing units needed to serve the projected growth and the income ranges within it. This should be used to designate sufficient land capacity suitable for development in the land use element.

(ii) Counties and cities may also use other considerations to identify housing needs, which may include:

(A) Workforce housing which is often defined as housing affordable to households earning between 80 to 120 percent of the median household income.

(B) Jobs-to-housing balance, which is the number of jobs in a city or county relative to the number of housing units.

(C) Reasonable measures to address inconsistencies found in buildable lands reports prepared under RCW 36.70A.215.

(D) Housing needed to address an observed pattern of a larger quantity of second homes in destination communities.

(iii) The targets established in the housing element will serve as benchmarks to evaluate progress and guide decisions regarding development regulations.

(e) Affordable housing. RCW 36.70A.070 requires counties and cities, in their housing element, to make adequate provisions for existing and projected needs for all economic segments of the community.

(i) Determining what housing units are affordable.

(A) In the case of dwelling units for sale, affordable housing has mortgages, amortization, taxes, insurance and condominium or association fees, if any, that consume no more than 30 percent of the owner's gross annual household income.

(B) In the case of dwelling units for rent, affordable housing has rent and utility costs, as defined by the county or city, that cost no more than 30 percent of the tenant's gross annual household income.

(C) Income ranges used when considering affordability. When planning for affordable housing, counties or cities should use income ranges consistent with the applicable countywide or multicounty planning policies. If no such terms exist, counties or cities should consider using the United States Department of Housing and Urban Development (HUD) definitions found in 24 C.F.R. 91.5, which are used to draft consolidated planning documents required by HUD. The following definitions are from 24 C.F.R. 91.5:

(I) Median income refers to median household income.

(II) Extremely low-income refers to a household whose income is at or below 30 percent of the median income, adjusted for household size, for the county where the housing unit is located.

(III) Low-income refers to a household whose income is between 30 percent and 50 percent of the median income, adjusted for household size, for the county where the housing unit is located.

(IV) Moderate-income refers to a household whose income is between 50 percent and 80 percent of the median income where the housing unit is located.

(V) Middle-income refers to a household whose income is between 80 percent and 95 percent of the median income for the area where the housing unit is located.

(ii) Affordable housing requires planning from a regional perspective. Countywide planning policies must address affordable housing and its distribution among counties and cities. A county's or city's obligation to plan for affordable housing within a regional context is determined by the applicable countywide planning policies. Counties and cities should review countywide affordable housing policies when developing the housing element to maintain consistency.

(iii) Counties and cities should consider the ability of the market to address housing needs for all economic segments of the population. Counties and cities may help to address affordable housing by identifying and removing any regulatory barriers limiting the availability of affordable housing.

(iv) Counties and cities may help to address affordable housing needs by increasing development capacity. In such an event, a county or city affordable housing section should:

(A) Identify certain land use designations within a geographic area where increased residential development may help achieve affordable housing policies and targets;

(B) As needed, identify policies and subsequent development regulations that may increase residential development capacity;

(C) Determine the number of additional housing units these policies and development regulations may generate; and

(D) Establish a target that represents the minimum amount of affordable housing units that it seeks to generate.

(f) Implementation plan.

(i) The housing element should identify strategies designed to help meet the needs identified for all economic segments of the population within the planning area. It should include, but not be limited to, the following:

(A) Consideration of the range of housing choices to be encouraged including, but not limited to, multifamily housing, mixed uses, manufactured houses, accessory dwelling units, and detached houses;

(B) Consideration of various lot sizes and densities, and of clustering and other design configurations;

(C) Identification of a sufficient amount of appropriately zoned land to accommodate the identified housing needs over the planning period; and

(D) Evaluation of the capacity of local public and private entities and the availability of financing to produce housing to meet the identified need.

(ii) The housing element should also address how the county or city will provide for group homes, foster care facilities, and facilities for other populations with special needs. The housing element should provide for an equitable distribution of these facilities among neighborhoods within the county or city

(iii) The housing element should identify strategies designed to ensure the vitality and character of existing neighborhoods. It should show how growth and change will preserve or improve existing residential qualities. The housing element may not focus on one requirement (e.g., preserving existing housing) to the exclusion of the other requirements (e.g., affordable housing) in RCW 36.70A.070(2). It should explain how various needs are reconciled.

(iv) The housing element should include provisions to monitor the performance of its housing strategy. A monitoring program may include the following:

(A) The collection and analysis of information about the housing market;

(B) Data about the supply of developable residential building lots at various land-use densities and the supply of rental and for-sale housing at various price levels;

(C) A comparison of actual housing development to the targets, policies and goals contained in the housing element;

(D) Identification of thresholds at which steps should be taken to adjust and revise goals and policies; and

(E) A description of the types of adjustments and revisions that the county or city may consider.

[Statutory Authority: RCW 36.70A.050 and 36.70A.190. WSR 23-08-037, § 365-196-410, filed 3/29/23, effective 4/29/23; WSR 10-03-085, § 365-196-410, filed 1/19/10, effective 2/19/10.]

Housing Element Review for the City of Tumwater's 2025 Comprehensive Plan Update

*Balancing Nature and Community:
Tumwater's Path to Sustainable Growth*

Planning Commission – August 22, 2023



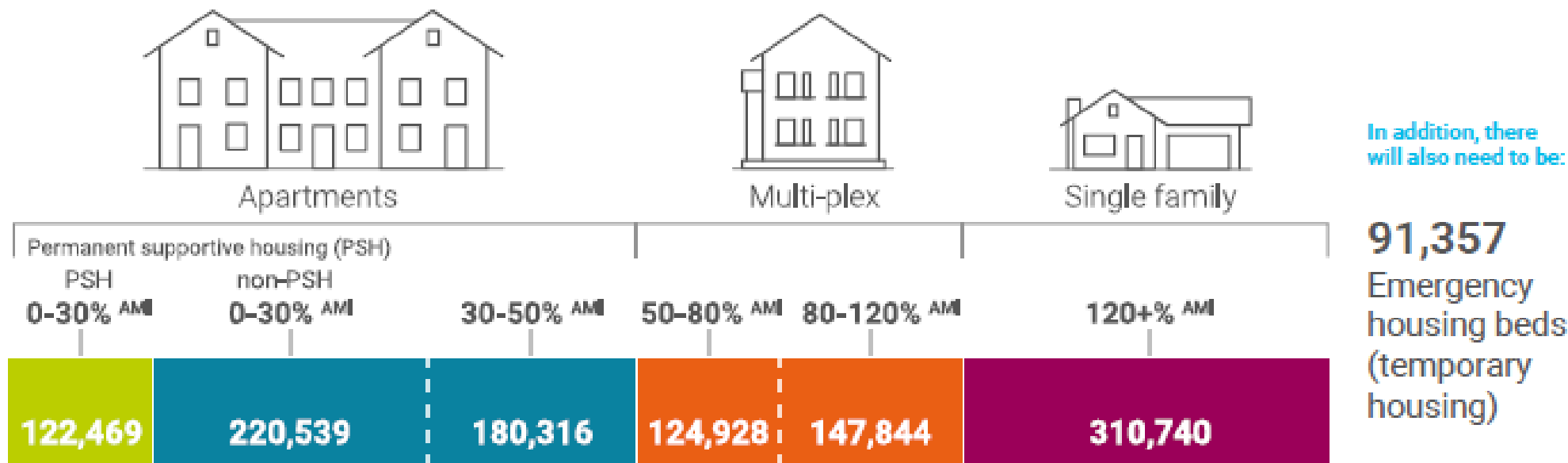
Intent

- Discuss Growth Management Act Housing Goal and requirements
- Present the current version of the Housing Element
- Consider specific issues for the Housing Element
- Consider how to incorporate diversity, equity, and inclusion throughout
- Discuss state guidance materials



Housing Need

According to the State Department of Commerce, statewide 1.1 million new homes will be needed in the next 20 years



State Department of Commerce

December 2022 State Housing Survey

The December 2022 Puget Sound Regional Council and State Department of Commerce Housing Survey noted:

- 83% of the respondents said more reasonably priced housing was needed in their communities
- 78% said they wanted more housing options for people in their communities
- Housing costs were a top issue for four times as many respondents (39%), compared to traffic and transportation (8%)



December 2022 State Housing Survey

Other responses from survey respondents included:

- 77% said rents were too high
- 75% said it cost too much to buy a home
- 49% found it difficult or very difficult to find affordable housing that met their needs
- 74% experienced one or more difficulties finding or affording housing
- 76% were directly impacted or knew someone affected by housing costs and availability
- 8% experienced threats of eviction or foreclosure
- 7% experienced discrimination in housing



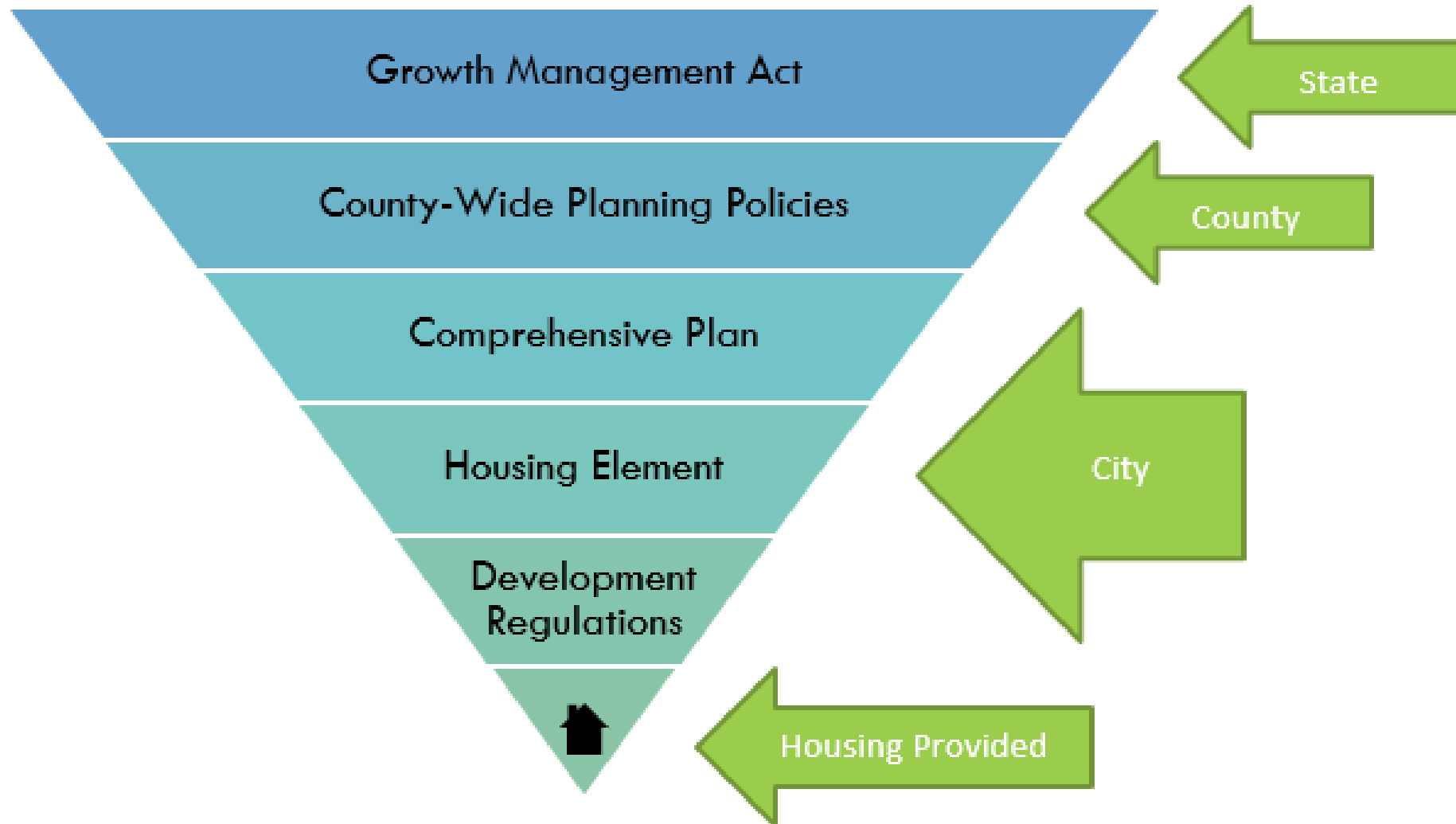
December 2022 State Housing Survey

Other responses from survey respondents included:

- 14% had been forced to move due to costs, eviction, or foreclosure
- 64% said government agencies should do more to provide housing not being delivered by the market
- 80% said that more housing, if done well, was likely to make their community better
- 58% agreed that middle housing, such as triplexes, should be allowed in single-family zones if they meet all of the standards of the zone
- 66% said their community needed more diverse and affordable types of housing



How the Requirements are Related



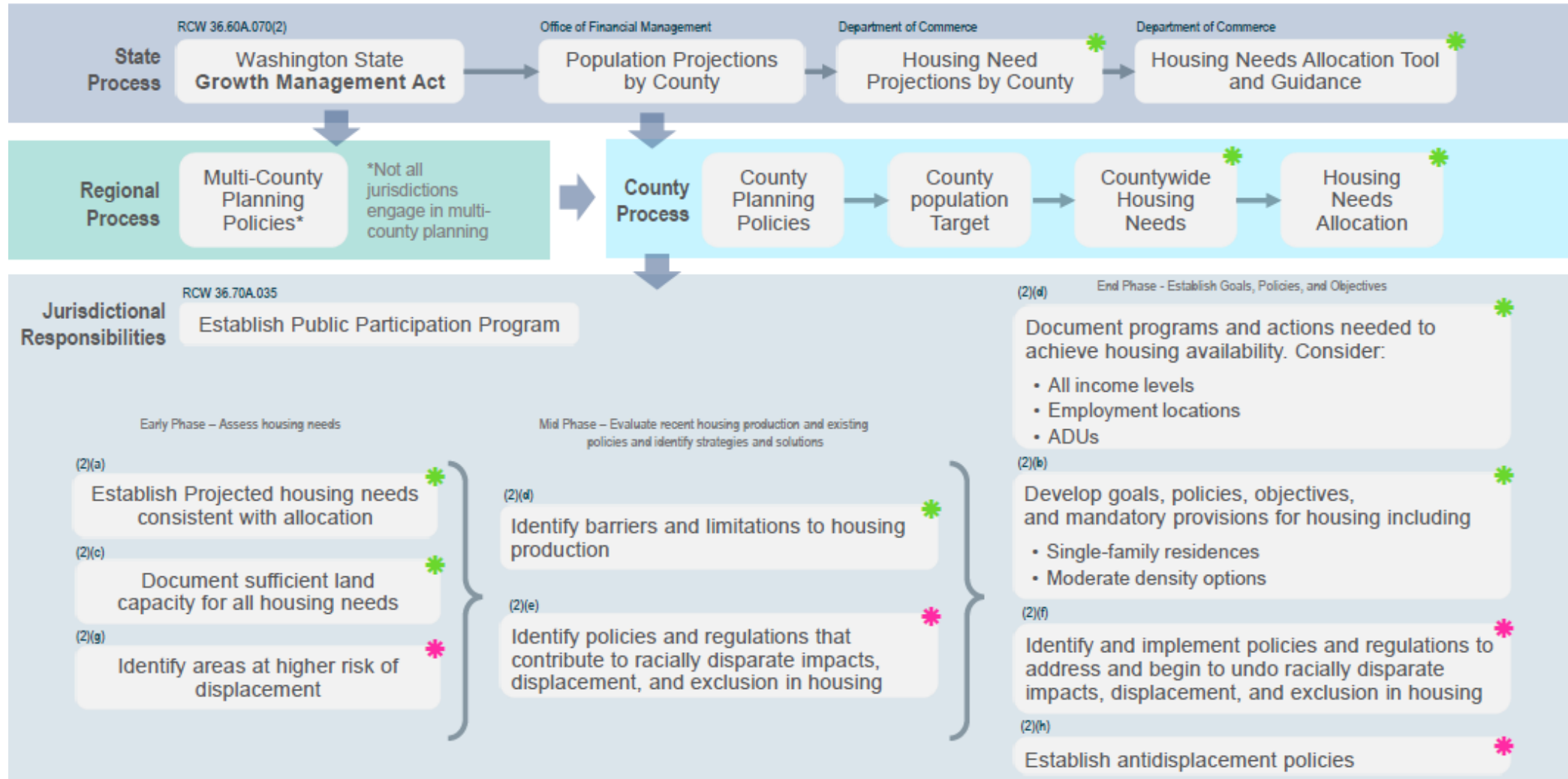
Growth Management Act – Housing Goal

- 4. Housing.** Plan for and accommodate housing affordable to all economic segments of the population of this state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock.



New GMA Framework for Updating Housing Elements

- ✱ New or modified housing needs (PHN) requirement
- ✳ New equity (RDI) requirement



State Department of Commerce



State Requirements for the Housing Element

Housing Element will need to address the following state Growth Management Act requirements to ensure the vitality and character of established residential neighborhoods

1. Include an inventory and analysis of existing and projected housing needs that identifies the number of housing units necessary to manage projected growth, including:
 - a. Units for moderate, low, very low, and extremely low-income households
 - b. Emergency housing, emergency shelters, and permanent supportive housing
2. Include a statement of goals, policies, objectives, and mandatory provisions for the preservation, improvement, and development of housing, including single-family residences, and moderate density housing options including, but not limited to, duplexes, triplexes, and townhomes



General Requirements for the Housing Element

3. Identify sufficient capacity of land for housing including, but not limited to the following:
 - a. Government-assisted housing
 - b. Housing for moderate, low, very low, and extremely low-income households
 - c. Manufactured housing
 - d. Multifamily housing
 - e. Group homes and foster care facilities
 - f. Emergency housing, emergency shelters, and permanent supportive housing
 - g. Consideration of duplexes, triplexes, and townhomes



General Requirements for the Housing Element

4. Make adequate provisions for existing and projected needs of all economic segments of the community, including:
 - a. Incorporating consideration for low, very low, extremely low, and moderate-income households
 - b. Documenting programs and actions needed to achieve housing availability including gaps in local funding, barriers such as development regulations, and other limitations
 - c. Consideration of housing locations in relation to employment location
 - d. Consideration of the role of accessory dwelling units in meeting housing needs



General Requirements for the Housing Element

5. In addition to the state requirements in WAC 365-196-410, the City will need to address new state legislation regarding accessory dwelling units and conversion of existing commercial or office uses to residential uses



Racially Disparate Impact Requirements

As part of the review and update of the Housing Element, the City is required to:

1. Identify local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing, including:
 - a. Zoning that may have a discriminatory effect;
 - b. Disinvestment; and
 - c. Infrastructure availability;
2. Identify and implement policies and regulations to address and begin to undo racially disparate impacts, displacement, and exclusion in housing caused by local policies, plans, and actions;



Racially Disparate Impact Requirements

3. Identify areas that may be at higher risk of displacement from market forces that occur with changes to zoning development regulations and capital investments; and
4. Establish antidisplacement policies, with consideration given to the following:
 - Preservation of historical and cultural communities as well as investments in low, very low, extremely low, and moderate-income housing
 - Equitable development initiatives
 - Inclusionary zoning
 - Community planning requirements
 - Tenant protections
 - Land disposition policies
 - Land that may be used for affordable housing



Housing Element Update Process



SEPA Review for the Housing

The adoption of required nonproject actions taken that increase housing capacity, increase housing affordability, and mitigate displacement that apply outside of critical areas are not subject to administrative or judicial appeal under SEPA unless the adoption of the nonproject actions has a probable significant adverse impact on fish habitat



County-Wide Planning Policies

I. GENERAL POLICIES

- 1.10 Meet basic human needs of clean water and air, healthy food, adequate housing, quality education, public safety, and equal access, regardless of socio-economic status

VIII. AFFORDABLE HOUSING

- 8.1 Increase housing choices to support all ranges of lifestyles, household incomes, abilities, and ages. Encourage a range of housing types and costs that are commensurate with the employment base and income levels of jurisdictions' populations, particularly for low, moderate and fixed income families
- 8.2 Accommodate low and moderate income housing throughout each jurisdiction rather than isolated in certain areas
- 8.3 Explore ways to reduce the costs of housing



County-Wide Planning Policies

VIII. AFFORDABLE HOUSING

[...]

- 8.4 Establish and maintain a process to accomplish a fair share distribution of affordable housing among the jurisdictions
- 8.5 Work with the private sector, Housing Authority, neighborhood groups, and other affected citizens, to facilitate the development of attractive, quality, low and moderate income housing that is compatible with the surrounding neighborhood and located within easy access to public transportation, commercial areas and employment centers
- 8.6 Regularly examine and modify policies that pose barriers to affordable housing
- 8.7 When possible, provide assistance in obtaining funding and/or technical assistance for the expansion or establishment of low cost affordable housing for low, moderate and fixed income individuals and families



Sustainable Thurston Goals

- H-1: Improve regulatory clarity and predictability to encourage urban infill and redevelopment
- H-2: Increase housing amid urban corridors and centers to meet the needs of a changing population
- H-3: Provide sufficient housing for low and moderate income households within each jurisdiction



Sustainable Thurston Goals

- H-4: Maximize opportunity to redevelop land in priority areas by investing in infrastructure and environmental remediation
- H-5: Provide sufficient service enriched housing for homeless and high-risk populations
- H-6: Encourage housing density and diversity in neighborhoods to add vibrancy and increase equitable access to opportunity
- H-7: Encourage the construction, weatherization, and operation of homes to boost energy efficiency



Housing Action Plan

- The City Council adopted the Tumwater Housing Action Plan in 2021
- The Plan is intended to inform the City's Comprehensive Plan policies and development regulations and to guide implementation strategies to help the City meet its housing needs and strategic objectives
- The Housing Action Plan will be used to support the update of the Housing Element and development regulations



Housing Action Plan

HOUSING NEEDS



State Department of
Commerce and
BERK



Purpose of the Housing Element

Housing Element – Studies the existing housing stock and explores methods of providing sufficient affordable housing for all economic segments



Structure of Current Housing Element

1. Introduction
 - 1.1 Introduction, including Table of Foundational Plans and Data
 - 1.2 Growth Management Act Goals Compliance
 - 1.3 County-Wide Planning Policy Compliance
 - 1.4 Sustainable Thurston Goals
 - 1.4.1 Priority Goals
 - 1.4.2 Community Goals
 - 1.4.3 Housing Goals
 - 1.5 Affordable Housing Definition
 - 1.6 Ongoing Review Program
 - 1.7 Amendments



Structure of Current Housing Element

- 2. Existing Housing Distribution
 - 2.1 Introduction
 - 2.2 Housing Pattern
 - 2.3 Housing Trends and Projections
- 3. Existing Housing Investment Profile
 - 3.1 Introduction
 - 3.2 Federal and State Housing Financing Programs
 - 3.3 Local Financing
 - 3.4 Conclusion



Structure of Current Housing Element

- 4. Affordable Housing Needs
 - 4.1 Introduction
 - 4.2 Emergency Shelters and Transitional Housing
 - 4.3 Private Subsidized Housing
 - 4.4 Publicly Subsidized Housing
 - 4.5 Low and Moderate Income Definitions
 - 4.6 Housing Needs Gaps and Coordination Points
 - 4.7 Homelessness
 - 4.8 Conclusion



Structure of Current Housing Element

- 5. Housing Goals, Policies, and Actions
 - 5.1 Housing Goals, Policies, and Actions
- 6 Regulatory Barrier Assessment
 - 6.1 Introduction
 - 6.2 Community Perceptions
 - 6.3 Growth Management
 - 6.4 Permitting
 - 6.5 Infrastructure
 - 6.6 Zoning Code
 - 6.7 Building Code
 - 6.8 Conclusion



Structure of Current Housing Element

- 7. Citywide Housing Needs
 - 7.1 Introduction
 - 7.2 Housing Needs
 - 7.3 Conclusion
- 8. Sufficient Land for Housing
 - 8.1 Introduction
 - 8.2 Identification of Expected Population
 - 8.3 Identification of Sufficient Land for Housing
 - 8.4 Sufficient Land for Specific Housing Needs
 - 8.4.1 Government Assisted Housing
 - 8.4.2 Housing for Low Income People
 - 8.4.3 Manufactured Housing
 - 8.4.4 Multi-Family Housing
 - 8.4.5 Group and Foster Care Homes



Structure of Current Housing Element

- 8.5 Vacancy Rates
- 8.6 Conclusion
- 9. Existing and Future Housing Provisions
 - 9.1 Introduction
 - 9.2 Protection of Existing Housing Stock
 - 9.3 Low and Moderate Income Provisions
 - 9.4 Regulatory Barriers to Affordable Housing
 - 9.5 Sufficient Land for 20 Years of Housing
 - 9.6 Employment
 - 9.6.1 Thurston County Employment Base
 - 9.7 Unemployment
 - 9.8 Conclusion



Current Housing Element

Link to current Housing Element:

<https://www.ci.tumwater.wa.us/departments/community-development-department/tumwater-comprehensive-plan>



Commerce Housing Guidance Materials

- Periodic Update Checklist for Fully-Planning Cities (March 2023)
- Guidance to Address Racially Disparate Impacts (April 2023)
- Establishing Housing Targets for Your Community (July 2023)
- Guidance for Updating Your Housing Element (2022)
- Missing Middle
 - Frequently Asked Questions about Middle Housing (May 2023)
 - Middle Housing in Washington: Fact Sheet for Implementing E2SHB 1110 (May 2023)



Commerce Housing Guidance Materials



WASHINGTON STATE
Department of
Commerce

GROWTH MANAGEMENT SERVICES

Middle Housing in Washington:

May 2023 Fact Sheet for Implementing E2SHB 1110

In 2023, the Washington State Legislature passed E2SHB 1110, which substantially changes the way many cities in Washington are to plan for housing. The bill requires cities of certain sizes and locations to allow multiple dwelling units per lot in a middle housing type of form.

What is middle housing? "Middle housing" is defined in the bill as "buildings that are compatible in scale, form, and character with single-family detached homes, duplexes, triplexes, fourplexes, townhomes, and cottage housing."

What are cities required to do? Each city must update its comprehensive plan and development regulations to reflect the requirements of the bill.

Which cities are required to update? Cities with a population of 10,000 or more, or cities in a designated growth area, are required to update their plans and regulations by January 1, 2025.

When does a local government need to update its plan? Local governments must update their comprehensive plans and development regulations within 12 months of the effective date of the bill.

¹ E2SHB 1110, Section 3 (1)
² Estimate: <https://ofm.wa.gov/population>
³ If your city is listed or not listed in the table, you must update your plan.

E2SHB 1110 MIDDLE
V3.1



Washington State
Department of
Commerce

We strengthen communities

Guidance for Updating Your Housing Element - Public Review Draft

To meet evolving community needs

LOCAL GOVERNMENT DIVISION
GROWTH MANAGEMENT
SERVICES



WASHINGTON STATE
Department of
Commerce


GROWTH MANAGEMENT SERVICES

Establishing Housing Targets for your Community

County-level considerations for housing planning

LOCAL GOVERNMENT DIVISION
GROWTH MANAGEMENT
SERVICES

V3.4




WASHINGTON STATE
Department of
Commerce

LOCAL GOVERNMENT DIVISION
GROWTH MANAGEMENT SERVICES

Periodic Update Checklist for Fully-Planning Cities

Overview: This checklist is intended to help cities that are fully planning under the Growth Management Act (GMA) conduct the "periodic review and update" of *comprehensive plans* and *development regulations* required by [RCW 36.70A.130 \(4\)](#). This checklist identifies components of comprehensive plans and development regulations that may need updating to reflect the latest local conditions or to comply with GMA changes since the last periodic update cycle (2015-2018). Statutory changes adopted since 2015 are emphasized in highlighted text to help identify new GMA requirements that may not have been addressed during the last update or through other amendments outside of the required periodic update process.

City
Staff contact, phone + email



Washington State
Department of
Commerce

We strengthen communities

Guidance to address racially disparate impacts

Updating your housing element to address new requirements

LOCAL GOVERNMENT DIVISION
GROWTH MANAGEMENT
SERVICES

Phase I – Community Engagement

Summer 2023 – Fall 2023

- Community Outreach – Initial Actions
- Gap Analysis – Completed September 2023
- Data Collection – Completed Spring 2024
- Format of the Updated Plan – Completed September 2023



Phase I – Gap Analysis

The Gap Analysis will use the following materials to review the Land Use Element:

1. Commerce Periodic Update Checklist
2. Ecology Critical Areas Checklist
3. Commerce Periodic Update Materials
4. 2022-23 State Legislation
5. Plans Adopted by the City since 2016
6. Specific Plans from Agencies Outside the City



Phase I – Gap Analysis

The Gap Analysis will identify what needs to be updated or added to the following in the Land Use Element:

1. Goals, policies, and actions
2. Technical information
3. Maps
4. Appendices
5. Subarea Plans



Phase I – Initial Element Review Worksessions

1. Housing Element– August 22, 2023 and September 26, 2023
 - Laura Hodgson, Senior Planner at the State Department of Commerce with a focus on GMA housing related issues, will be attending the September 26, 2023 worksession

Phase II – Plan Development

Winter 2024 – Fall 2024

- Community Outreach
 - Actions to be determined based on Phase 1 results and Community Outreach Plan
- Schedule
 - Continuing Community Outreach – January 2024 – June 2024
 - Commerce review proposed Plan format – March 2024
 - Comprehensive Plan Individual Element Development Meetings – January 2024 – October 2024
 - Development Code Amendment Meetings – March 2024 – October 2024



Phase III – Legislative Process

Fall 2024 – June 30, 2025

- Commerce Review – Fall 2024 – Winter 2025
- Prepare Ordinance – October 2024
- SEPA Review and Commerce Notice of Intent – November 2024 – December 2024
- Public Adoption Meetings
 - Planning Commission November 2024 – February 2025
 - City Council March 2025 – June 2025
- Notice of Adoption – June 30, 2025



Next Steps

- September 12, 2023 – Land Use Element worksession
- September 26, 2023 – Housing Element worksession

Comments and Contact information

Written comments are welcome at any time during the periodic update process and staff will address and publish all formal comments

City of Tumwater Contact:

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City of Tumwater Planning Manager
Community Development Department
555 Israel Road SW
Tumwater, WA 98501
Phone: 360-754-4180
Email: bmedrud@ci.tumwater.wa.us

- The periodic update email is compplan@ci.tumwater.wa.us
- All documents related to the periodic update will be located on the [City's periodic update webpage](#)



Tumwater City Plan 2036 Housing Element



**CITY OF TUMWATER
HOUSING ELEMENT**

*2016 Update/Adopted December 20, 2016
Amended January 2018, Ordinance O2017-024
Amended January 2019, Ordinance O2018-006
Amended December 2019, Ordinance O2019-004
Amended November 2020, Ordinance O2020-002
Amended October 2021, Ordinance O2021-003*

TUMWATER CITY COUNCIL

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Brad Medrud, AICP, Planning Manager
David Ginther, Senior Planner
Megan Lande, Planning Intern

**CITY OF TUMWATER
HOUSING ELEMENT**

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Amended November 2020, Ordinance O2020-002
Amended October 2021, Ordinance O2021-003*

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**HOUSING ELEMENT
CHAPTER 1**

INTRODUCTION

1. INTRODUCTION

1.1 Introduction

Table 1 identifies documents that address each of the listed facilities in detail. These documents are incorporated by reference into the Housing Element.

Table 1. Foundational Plans and Data

Topic Index	Supporting Plan and Materials
General Policy	<ul style="list-style-type: none"> • See Land Use Element • County-Wide Planning Policies, Thurston County (2015) • Sustainable Thurston, Thurston Regional Planning Council (2013)
Homelessness	<ul style="list-style-type: none"> • Accountability Audit Report, Housing Authority of Thurston County (2014) • Thurston County Homeless Census Report (2016)
Housing Trends and Projections	<ul style="list-style-type: none"> • See Land Use Element • 2015 Profile, Thurston Regional Planning Council • Buildable Lands Report for Thurston County, Thurston Regional Planning Council (2014) • US Census Data • Washington State Housing Needs Assessment, Affordable Housing Advisory Board (2015)

The Housing Element, a portion of Tumwater's overall Comprehensive Plan has been prepared in response to the Growth Management Act (Chapter 36.70A RCW). The Act requires:

"...housing element recognizing the vitality and character of established residential neighborhoods that: (a) Includes an inventory and analysis of existing and projected housing needs; (b) includes a statement of goals, policies, and objectives for the preservation, improvement, and development of housing, including single family residences; (c) identifies sufficient land for housing, including, but not limited to, government-assisted housing, housing for low-income families, manufactured housing, multifamily housing, and group homes and foster care facilities; and (d) makes adequate provisions for existing and projected needs of all economic segments of the community."

The Housing Element has been prepared in accordance with the requirements of Chapter 36.70A RCW and WAC 365-196.

1.2 Growth Management Act Goals Compliance

Chapter 36.70A RCW requires that Tumwater show how the Housing Element meets the relevant planning goals contained within the Act. The following is a listing of the applicable goals of housing and an analysis of how the Housing Element helps meet the goals:

1. *Urban growth. Encourage development in urban growth areas where adequate public facilities and services exist or can be provided in an efficient manner.*

The Housing Element contains policies encouraging development in the urban growth area (Goal #11, Policies 11.1 and 11.2).

2. *Reduce sprawl. Reduce the inappropriate conversion of undeveloped land into sprawling, low density development.*

The Tumwater Housing Element contains goals and policies encouraging urban growth to be phased outward from the urban core and encourages development of housing on vacant and underdeveloped properties in order to reduce urban sprawl. In conjunction with the Land Use Element, the Housing Element establishes policies requiring minimum lot sizes in order to reduce overall residential lot sizes and thereby reduce sprawl.

4. *Housing. Encourage the availability of affordable housing to all economic segments of the population; promote a variety of residential densities and housing types; and encourage preservation of existing housing stock.*

The Housing Element includes a variety of policies expressly designed to encourage housing affordability, including a multitude of regulatory changes dispersed throughout the document.

7. *Permits. Application for both state and local government permits should be processed in a timely and fair manner to ensure predictability.*

This document has a chapter on barrier assessment. Tumwater tracks permit processing times and it has historically achieved relatively short turnaround times for permits. There is no indication that Tumwater permit process times affect housing affordability.

11. *Citizen participation and coordination. Encourage the involvement of citizens in the planning process and ensure coordination between communities and jurisdictions to reconcile conflicts.*

The Tumwater Housing Element was originally prepared through open public meetings in the early 1990s by the Land Use and Housing Committee, a subcommittee of the Tumwater Planning Commission. During the update to the Tumwater Comprehensive Plan in 2015-2016, Tumwater conducted a survey utilizing a professional phone survey service, postal mailings, and Tumwater's website. General announcements appeared on Tumwater's website, Tumwater's Constant Contact email list was used to send announcements, and articles appeared in the Tumwater On Tap e-newsletter. Tumwater staff also attended meetings with homeowner associations, civic and business groups. The Mayor also included the update in his "State of the City" presentations. This approach ensured public participation.

1.3 County-Wide Planning Policy Compliance

The Growth Management Act requires that comprehensive plans be consistent with Thurston County's County-Wide Planning Policies, as amended in 2015. The following is a list of the relevant sections of the County-Wide Planning Policies that apply to the Housing Element. All County-Wide Planning Policies are adopted as Appendix B to the Land Use Element of the Comprehensive Plan.

The Housing Element of the Comprehensive Plan is the principal policy document concerning affordable housing. The Land Use Element works with the Housing Element to provide adequate suitably zoned vacant land to further the policies of the Housing Element. Each residential designation in the Land Use Element, including the Mixed Use designation, provides a variety of housing types to ensure that affordable housing is provided for all economic segments of the Tumwater population. The Land Use Element, in conjunction with the Housing Element, includes policies and land use designations designed to ensure the provision of affordable housing.

The Housing Element includes a variety of policies expressly designed to encourage housing affordability, including but not limited to, suggested regulatory changes dispersed throughout the document.

VIII. Affordable Housing

8.1 Increase housing choices to support all ranges of lifestyles, household incomes, abilities, and ages. Encourage a range of housing types and costs that are commensurate with the employment base and income levels of jurisdictions' populations, particularly for low, moderate and fixed income families.

The Housing Element addresses how best to provide affordable housing for all economic segments of Tumwater's population by examining current housing conditions, regulatory barriers, and projected housing needs. The Element contains a variety of policies encouraging a wide range of housing choices, such as providing sufficient, suitably zoned land for housing; encouraging development of innovative plans, codes, and standards for affordable housing; and implementation of a mixed-use zone to provide a mix of housing types.

8.2 Accommodate low and moderate income housing throughout each jurisdiction rather than isolated in certain areas.

The Housing Element discourages the concentration of low and moderate income housing, favoring dispersal of such housing.

8.3 Exploring ways to reduce the costs of housing.

The Housing Element's purpose is to explore ways to reduce the cost of housing.

8.4 Establish and maintain a process to accomplish a fair share distribution of affordable housing among the jurisdictions.

The Housing Element recommends that the fair share distribution of affordable housing among the jurisdictions be decided on a regional basis.

8.5 Working with the private sector, Housing Authority, neighborhood groups, and other affected citizens, to facilitate the development of attractive, quality, low and moderate income housing that is compatible with the surrounding neighborhood and located within easy access to public transportation, commercial areas and employment centers.

Throughout the Housing Element, there are numerous policies

HOUSING ELEMENT CHAPTER 1

INTRODUCTION

encouraging the development of attractive low and moderate income housing to serve the needs of Tumwater. The City will comply with these goals by increasing density in specified areas, increasing the range of housing types, considering accessory dwelling units, and building partnerships with other agencies and organizations including homeowners associations to reduce restrictions and increase affordable housing stock

8.6 Regularly examine and modify policies that pose barriers to affordable housing.

The chapter on barrier assessment in the Housing Element provides specific recommendations on regulatory amendments to encourage affordable housing.

8.7 When possible, provide assistance in obtaining funding and/or technical assistance for the expansion or establishment of low cost affordable housing for low, moderate, and fixed income individuals and families.

The Housing Element contains language that encourages the City Council to consider funding requests favorably for low income housing providers, such as the Thurston County Housing Authority.

1.4 Sustainable Thurston Goals

Tumwater adopts as part of the Housing Element the following Sustainable Thurston Goals:

1.4.1 Priority Goals

Priority Goal 1: Create vibrant centers, corridors, and neighborhoods while accommodating growth.

1.4.2 Community Goals

C-1: North County – Urban Corridors & Centers: Create vibrant city centers and activity nodes along transit corridors that support active transportation and housing, jobs, and services.

1.4.3 Housing Goals

HOUSING ELEMENT CHAPTER 1

INTRODUCTION

- H-1: Improve regulatory clarity and predictability to encourage urban infill and redevelopment.
- H-2: Increase housing amid urban corridors and centers to meet the needs of a changing population.
- H-3: Provide sufficient housing for low and moderate income households within each jurisdiction.
- H-4: Maximize opportunity to redevelop land in priority areas by investing in infrastructure and environmental remediation.
- H-5: Provide sufficient service enriched housing for homeless and high-risk populations
- H-6: Encourage housing density and diversity in neighborhoods to add vibrancy and increase equitable access to opportunity.
- H-7: Encourage the construction, weatherization, and operation of homes to boost energy efficiency.

1.5 Affordable Housing Definition

WAC 365-196-410 requires that the Comprehensive Plan include a definition of "affordable housing." This is a difficult definition to arrive at, because obviously what is affordable for one family can be drastically different from what is affordable for another family. A higher income family may be looking to purchase a larger home, while a lower income family may be struggling to pay the rent on an apartment that is too small for their needs.

Because of this possible disparity, the U.S. Department of Housing and Urban Development uses a definition of affordability that is based on a percentage of gross income. U.S. Department of Housing and Urban Development allows up to 30% of a family's gross income to be available for gross housing costs, including mortgage payments or rent, and utility payments. The Housing Element will use the same definition of "affordable housing."

In practice, the median family income for a family in Tumwater was \$62,366 in 2013. For the median family, affordable housing would be any housing that cost \$1,559 per month or less, including utilities. Similarly, a family that earned 80% of the median income could afford \$1,247 a month in mortgage/rent and utilities. Currently, Tumwater's average rent is \$1,056 per month, and \$1,233 with utilities.

1.6 Ongoing Review Program

Tumwater will review and update the Housing Element as necessary to address community needs or to comply with State law. In order to monitor the performance of the housing strategy, Tumwater will continue to work with the Thurston Regional Planning Council to track land use, population, and housing, and provide periodic reports.

1.7 Amendments

The Housing Element is subject to amendment in order to ensure internal and interjurisdictional consistency of the Comprehensive Plan and with the development regulations implementing the Comprehensive Plan. This evaluation will be an integral part of the amendment process.

State law does not allow more amendments than once annually, except in cases of emergency. The amendment process will consider concurrently all proposed changes to the document accumulated over time since the last amendment, in order to ascertain the cumulative impact of the proposed changes.

2. EXISTING HOUSING DISTRIBUTION

2.1 Introduction

In order to effectively plan for the housing needs of Tumwater residents, present and future, it is necessary to understand the existing housing distribution in Tumwater. This chapter of the Housing Element serves as an analysis of the existing housing profile in Tumwater. It will include information on the number and housing stock type.

To aid the housing study, Tumwater has been divided into several neighborhood planning areas, which are roughly defined by the predominant land uses or significant characteristics of each area.

2.2 Housing Pattern

Table 2 and Figure 1 show the total number of dwelling units for Tumwater as a whole. A dwelling unit is defined as a structure or portion of a structure that one family lives in. As an example, a single-family dwelling would have one dwelling unit, a duplex – two dwelling units, and an apartment building might have eight or more dwelling units.

Tumwater has 8,680 total dwelling units. The totals of each type of housing unit are also shown for the entire city. It is interesting to note that 55% of the units are single family; 37% are multi-family; and 8% are manufactured units.

2.3 Housing Trends and Projections

It is difficult to estimate housing trends and projections because the provision of housing is still primarily a function of the marketplace. Additionally, annexations can skew these estimates and projections significantly. However, one way to ensure accurate projections of housing need and housing stock is to review the historical growth in housing stock and apply that growth level to the future.

From 1991 to January 1, 2016, the total housing units in Tumwater increased from 4,691 to 8,680, and 11,390 including the Urban Growth Area. This amounts to a 100% increase over the 25-year period between 1991 and 2016. Although this increase sounds significant, annexations account for a sizeable amount of this increase. Between 2000 and 2016, 32 annexations were completed which brought more than 2,000 additional housing units into Tumwater accounting for over half the increase. Over the next 20-year planning period, Tumwater expects to require an additional 8,000 housing units to accommodate population growth with a different mix of housing than has been needed in the past. The impact of annexations on total housing units will be much smaller over the next 20 years than in the past because

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EXISTING HOUSING DISTRIBUTION

Tumwater has annexed the majority of the Urban Growth Area. Most of the new housing units will be built within the existing city limits of Tumwater.

The State Office of Financial Management and Thurston Regional Planning Council have estimated that 370,600 people will live in Thurston County by the year 2035.¹ This is a 39% increase over the 2015 population of 267,400.

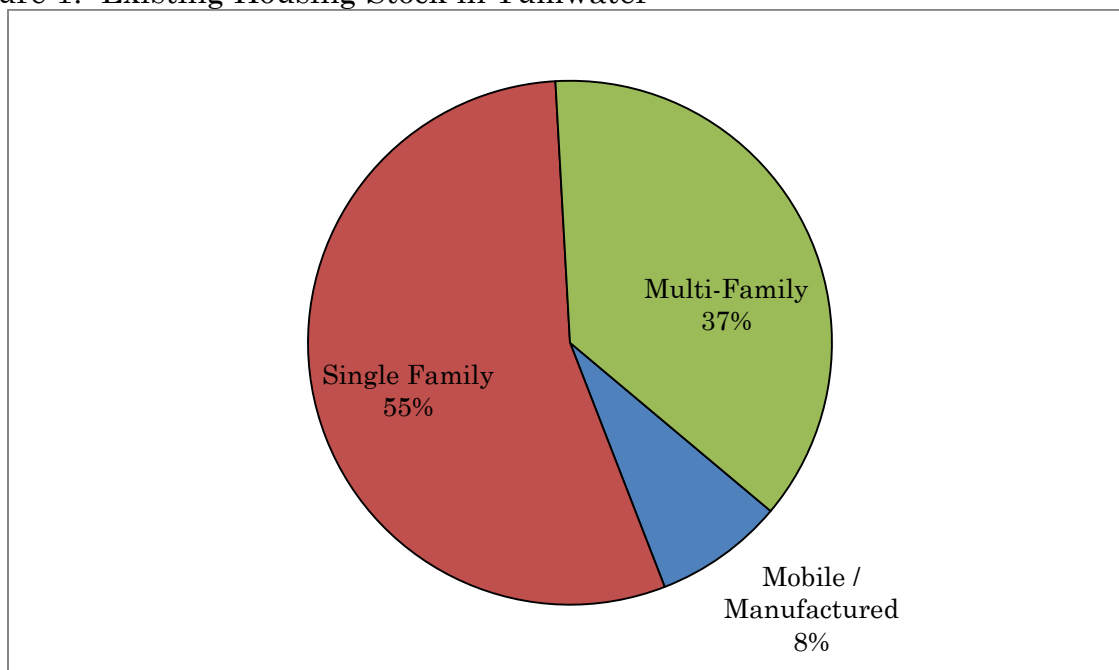
The ratio of owner-occupied and non-owner occupied housing is another aspect of housing that gives some insight into the community's makeup. In 1990, 53% of the housing units in Tumwater were owner occupied. In 2000, that number dropped to 48% and increased again to 54% in 2015. Just under half of all homes in Tumwater are rented, higher than the state average of 38% rental to owner occupied.

Table 2. Existing Housing Stock in in the City of Tumwater

City Wide	Totals
Single Family	4,770
Multi-Family	3,190
Mobile / Manufactured	720
Total	8,680

¹ The City of Tumwater started the update process in 2015 using data from 2015 and did not receive 2016 data until it was too late to incorporate in the update process.

Figure 1. Existing Housing Stock in Tumwater



3. EXISTING HOUSING INVESTMENT PROFILE

3.1 Introduction

The provision of affordable housing for all economic segments of the Tumwater population is largely a function of private enterprise. An important part of the private sector's role in providing housing occurs through construction financing and home mortgage financing. Sufficient rental housing is partially dependent on the developer's ability to obtain construction financing. Similarly, the ability to purchase housing is dependent upon the ability to obtain financing through a lending institution. This chapter of the Comprehensive Plan provides an analysis of the existing financing profile in Tumwater and the wider Thurston County area.

There are two primary ways loans are made available to potential home buyers. The first is conventional loans through banks and other lending institutions. Money is loaned to the potential homeowner based upon that person's credit rating and ability to fund a down payment.

The second is federally insured loans. The federal government, through the FHA, VA, or other programs, guarantees the loan that a lending institution might make. Should the borrower forfeit the loan, the federal government would repay it.

3.2 Federal and State Housing Financing Programs

There are a number of federal and state programs designed to assist home buyers and renters. This web of programs and regulations is very complex and is beyond the scope of the Housing Element to analyze each of these programs fully.

Because these programs can change significantly over a short period and interest rates change daily, it is most effective to contact local authorities with expertise in these programs to obtain assistance. The following organizations can provide further information:

- Housing Authority of Thurston County
- Washington State Information Network (Dial 211)
- Crisis Clinic of Thurston County (www.crisis-clinic.org)
- Thurston County Veterans Outreach Center, 4232 Sixth Avenue SE, Suite 202, Lacey

- Washington State Department of Commerce Housing and Homeless Program

3.3 Local Financing

Local funding from cities and Thurston County mostly takes the form of local matching funds to federal or state funding programs. In addition to this, however, local governments do have some limited local options for financing public housing and related social service programs. These include:

- Use of general funds to provide grants and loans to service organizations through regional partnerships. For example, the City of Tumwater has committed 1/2% of its sales tax receipts to match funds from other jurisdictions and United Way as part of a Community Investment Partnership agreement that funds local housing and social service programs. This partnership also distributes Federal HOME and State housing grant funds.
- Use of general funds for direct funding of housing and social service programs through contract with the City. For example, the City of Tumwater has traditionally budgeted about \$10,000 annually to directly fund social service programs.
- Under RCW 84.54.105, the City Tumwater also has the option of asking voters to support an excess property tax levy of up to 50 cents per \$1,000 valuation to support affordable housing and related programs. Local affordable housing advocates have requested City exercise this option.
- The City of Tumwater recently signed an agreement with Thurston County and the City of Lacey that makes the three jurisdictions entitled to receive Federal Community Development Block Grants. Under this agreement, the City of Tumwater gets to decide how to allocate these funds once every three years. In the first cycle of this agreement, the City allocated a majority of this funding for affordable housing programs. Discussions are currently underway to explore if all three jurisdictions would be willing to do this to provide another reliable funding source for these programs.

See Sections 4.3 and 4.4 of the Housing Element for additional discussion of subsidized housing.

3.4 Conclusion

As stated in the introduction to this chapter, the provision of rental and owner occupied housing is primarily accomplished by the private sector. Policies at the federal level about taxes and financial regulations on private lenders greatly influence the availability of funding for the construction of rental and owner-occupied housing construction and purchase. There are, however, some limited programs available to federal, state, and local governments for funding housing and related social programs.

4. AFFORDABLE HOUSING NEEDS

4.1 Introduction

Despite the efforts of non-profit and other public and private housing service agencies and organizations, there is increasing demand for affordable housing. Funding for these types of housing and related services is limited.

This chapter of the Housing Element will identify some of the services that are provided to people in Tumwater and Thurston County. In addition, an analysis of the need vs. demand will be made and conclusions will be drawn from the information provided. This portion of the Housing Element is very important because affordable housing needs are increasing.

4.2 Emergency Shelters and Transitional Housing

In Thurston County, outside of the Thurston County Jail, there are currently 252 beds in shelters and transitional (subsidized) housing. Sixty-six additional beds are available in cold weather during snow or other anticipated cold weather events and accommodating approximately 82% of the homeless during cold weather and 68% at other times. None of the emergency shelters are located in the City of Tumwater. However, in the past, City of Tumwater has authorized use of City buildings for cold weather shelters. In addition, the Tumwater Municipal Code allows for the establishment of temporary homeless encampments by sponsoring religious organizations.

While no emergency shelters currently exist in the City of Tumwater, there are a number of transitional and permanent publically subsidized housing units. These include units managed by the Community Action Council, the Thurston County Housing Authority, Homes First!, and Habitat for Humanity. The City of Tumwater has also established a specific zoning category for mobile/manufactured housing to ensure properties containing these affordable housing units are not converted to other more expensive forms of housing or commercial land uses. This ordinance has been successfully defended in both state and federal court. In addition, Behavioral Health Resources operates several subsidized permanent housing facilities in the City of Tumwater for individuals with mental health issues.

See Table 3 for additional information on available emergency shelters in the Tumwater area and Table 4 for additional information on transitional and low-income housing units in the City.

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Table 3. Shelter Capacity in Tumwater Area

Service Agency	Facility	Total Beds / Living Units	Type
Community Care Center	225 State Avenue NE Olympia, WA (360) 915-8623	100 Spaces	Daytime Service Centers Only
Community Youth Services (CYS)	Young Adult Shelter 711 State Avenue NE Olympia, WA	12 + 27 (11/1 – 4/30)	Youth Age 18- 24
Community Youth Services (CYS)	Rosie's Place 520 Pear Street SE Olympia, WA (360) 918-7879	40 Spaces	Children Daytime Shelters Only
Drexel House	1139 5th Avenue SE Olympia, WA (360) 515-5587	16	Single Adults
Family Support Center	Pear Blossom Place 201 Capitol Way Olympia, WA (360) 628-7343	36 + 30 (11/ 1 – 4-30)	Families
Family Support Center	201 Capitol Way N Olympia, WA (360) 754-9297	10 Spaces	Daytime Shelters Only
Interfaith Works	701 Franklin Street SE Olympia, WA (360) 918-8424	42	Single Adults
Lacey Veteran HUB	4232 6th Avenue Suite 202 Lacey, WA (360) 456-3850	Not available	Daytime Service Centers Only
Partners in Prevention Education (PiPE)	408 – 7th Avenue SE Olympia, WA (360) 357-4472	Not available	Daytime Service Centers Only

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Service Agency	Facility	Total Beds / Living Units	Type
SafePlace (Domestic Violence Victims)	521 Legion Way SE Olympia, WA (360) 754-6300	28	Families
St. Michael's Catholic Parish/Sacred Heart Parish (rotating)	1208 11 th Avenue SE Olympia, WA (360) 754-4667	14 (11/1 – 3/15)	Single Adults
Salvation Army	824 5 th Avenue SE Olympia, WA (360) 252-9569	30 (11/1 – 4/30)	Single Adults
Thurston County Jail	3490 Ferguson Street SW Tumwater, WA	352	Jail
Union Gospel Mission	413 Franklin Street NE #A Olympia, WA (360) 709-9725	65 Spaces + 15 (11/1 – 4/30)	Single Adults
Union Gospel Mission	413 Franklin Street NE #A Olympia, WA (360) 709-9725	140 Spaces	Daytime Shelters Only

Table 4. Transitional and Low Income Housing Units in the City of Tumwater

Service Agency	Facility	Living Units
Behavioral Health Resources (BHR)	Recovery Services 6128 Capitol Boulevard Tumwater, WA	Not Known
Behavioral Health Resources (BHR) Housing Properties	The Gardens 1275 2nd Avenue SW Tumwater, WA	34

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Service Agency	Facility	Living Units
Behavioral Health Resources (BHR) Housing Properties	115 X Street SW Tumwater, WA	8
Catholic Community Services of Western Washington (CCSWW)	Tumwater Apartments 5701 6th Avenue SW Tumwater, WA	50 – Section 202 Supportive Housing for the Elderly
Community Action Council (CAC) of Lewis, Mason, and Thurston Counties	Deschutes Cove Apartments 7201 Henderson Boulevard SE Tumwater, WA	44
Foundation for the Challenged	4014 61st Court SW Tumwater, WA	1 Single Family House
Housing Authority of Thurston County (HATC)	Falls Pointe 411 Lee Street SW Tumwater, WA	108
Housing Authority of Thurston County (HATC)	Lake Park 1233 Lake Park Drive SW Tumwater, WA	8
Housing Authority of Thurston County (HATC)	McKenna Lane 206 – 226 McKenna Lane SW Tumwater, WA	6
Housing Authority of Thurston County (HATC)	Sequoia Landing 7136 Littlerock Road SW Tumwater, WA	40
Housing Authority of Thurston County (HATC)	Spring Court 5735 Linderson Way SW Tumwater, WA	8
Housing Authority of Thurston County (HATC)	Trails End Duplexes 7440 – 7446 Trails End Drive SE Tumwater, WA	8

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Service Agency	Facility	Living Units
Housing Authority of Thurston County (HATC)	Twin Homes at Allen Orchard 202 – 256 Allen Orchard Lane SE Tumwater, WA	28
South Puget Sound Habitat for Humanity	Shepard's Grove 5108 – 5116 Henderson Boulevard SW Tumwater, WA	5 Single Family Houses
Homes First!	1344 Susitna Lane SW Tumwater, WA	1 Single Family House
Homes First!	423 Z Street SE Tumwater, WA	1 Single Family House
Quixote Village	3350 Mottman Road SW Tumwater, WA	30
Union Gospel Mission	6617 – 6631 Littlerock Road SW Tumwater, WA	12
Union Gospel Mission	3118 Hampton Drive SW Tumwater, WA	1
Union Gospel Mission	1044 Grant Street SW Tumwater, WA	2

4.3 Private Subsidized Housing

Subsidized housing is made available by private building owners and through public vouchers. With private subsidized housing, an owner of housing units receives low interest loan or grants for construction or rehabilitation of housing units. In exchange, the owner agrees to make available a certain number of units at a price affordable to low income families. These agreements are made by contract for a set period. Tumwater currently has 94 subsidized housing units of this type with 50 units reserved for the disabled or elderly. Waiting lists for access to these units are kept by the individual property owners and averaging two years.

4.4 Publicly Subsidized Housing

In contrast to private subsidized housing, assistance is also available from Section 8 Federal Funds directed through the Housing Authority of Thurston County. Section 8 works like rental assistance where you generally find a private owner and then the

voucher pays part of the rent, usually 70% if income qualified.

Additional funding for housing is available through Federal and State sources, including revenues from recording fees that are authorized by the State of Washington. Those funds are scheduled to sunset in 2019 unless reauthorized by the Legislature.

4.5 Low and Moderate Income Definitions

The State of Washington, as part of its Comprehensive Housing Affordability Study, defines various low and moderate-income levels in order to determine eligibility for federal and state housing assistance programs and benchmarking. The following are general state definitions for various low and moderate income groups:

- Poverty or Extremely Low Income Families are defined as a family of four, earning \$23,050 per year or less. This is about 30% of Washington's median family income. Currently, approximately 11% of Tumwater families meet the poverty criteria.
- Very Low Income Families earn less than 50% of median income. This income group has the greatest difficulty in locating and staying in affordable housing. There are very few areas of the state that have fair market rents low enough for people in this bracket to afford without assistance.
- Low Income Families earn approximately \$31,000 annually, which is between 51% and 80% of median income. Families in this income category are not as likely to find rental housing at rates they can afford. Searches for affordable housing will be difficult because of low vacancy rates. Families in this income range will not be able to afford single-family housing without some form of assistance.
- Moderate Income Families earn approximately between 81% and 95% of median income. These families are able to afford rental housing, although vacancy rates are a concern for this group as well. Families in this income bracket have historically been able to become homeowners. Buying a home for this group is becoming much more difficult in the Puget Sound region where housing price increases and real income level decreases have taken a toll. Because of this difficulty in purchasing housing, many families in this group continue to rent when they would prefer to buy. The presence of families in this income category in the rental market tends to focus property owners and developers toward higher end rental units, driving prices up and lower income families out of the rental market.

- Middle Income Families earn between 96% and 120% of median income. Families in this income category are able to find rental housing in every market in Washington State. Purchasing a home can still be difficult in the Puget Sound region, especially in King and Pierce Counties, but also Thurston County and Tumwater. In most other areas of Washington outside Puget Sound, families in this group can afford the mortgage payments on a house, but may find accumulating a down payment while renting difficult.

Median Family Income is determined periodically by Department of Housing and Urban Development based on state and local employment and earnings data and is the official yardstick for calculating income levels, which qualify for particular federal programs. The figures are adjusted according to family size, so that median income level would be less for a family of two than for a family of four. See Section 1.4 for a more detail discussion.

4.6 Housing Needs Gaps and Coordination Points

It is very difficult to fill gaps in the web of service provision to low and moderate income groups at the local level through public action. Funding for low and moderate income families in Tumwater must compete with all services provided by a municipality, such as streets, police, and fire.

Based on the data available, it is clear that the need for affordable housing and human services far exceeds the available supply. In addition, the process of drafting a Housing Element requires that the various jurisdictions meet and discuss the salient issues involved with affordable housing provision. This also raises the level of awareness of the decision-makers in Thurston County.

In summary, while direct public action can fill some of the gaps in affordable housing this are broader societal issues that cannot be solved by Tumwater alone. Additional efforts will be needed at regional, state, and federal levels to make progress in the underlying causes of lack of affordable housing.

4.7 Homelessness

While overall homelessness in Thurston County is down from the peak of the recession in 2010-2012, to 476 living outdoors, in shelters or in transitional housing, data that is more recent shows that the trend is increasing again in our community. The increase in homelessness among children, disabled populations, and the aging is the greatest concern.

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Table 5. 2019 Tumwater School District - Poverty and Homelessness

Student Poverty and Homelessness	Number of Students	Percentage of Students
Free and Reduced Lunches	1,736	27%
Students Experiencing Homelessness	210	3%
Total Student Population	6,501	100%

Note: Source: Thurston County Homeless Census Report for 2019

Recent state studies show that Office of Superintendent of Public Instruction captures only 58% of homeless children in their surveys. This means that Tumwater's total number of homeless children is more likely in the range of 420 to 430.

4.8 Conclusion

In conclusion, it appears that the emergency shelter needs in Thurston County are beyond capacity at this time and homelessness among the young, disabled and aging is of particular concern. Additional emergency shelters of all types will likely be needed over the 20-year period of the Housing Element. Tumwater should consider targeted planning efforts to evaluate gaps and funding options to serve these critical needs in the community. The City should work with Tumwater School District and other regional partners to conduct a needs assessment evaluating gaps and funding options to improve the safety net for families with children, aging, and disabled populations living within the community.

Human service agencies throughout Thurston County emphasize housing as a top priority to meet the goals of stabilizing families. Until families find safe, affordable, permanent housing, it is very difficult to work on other crisis issues, which affect the family. Thurston County shelter and housing providers have continually emphasized the need for transitional and permanent housing. Transitional housing, usually apartments, are provided free or on a sliding scale basis in order to allow their occupants to save enough money to make the jump to market-rate, rental housing.

While several organizations provide transitional and permanent subsidized housing in Tumwater, there are currently not enough of these units available. With market rents being relatively high and the average monthly rent with utilities in Tumwater is \$1,233.00, there is a tremendous gap between transitional and subsidized housing and market rents. This gap is only partially filled by public and private subsidized housing

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and transitional housing.

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HOUSING GOALS, POLICIES, AND ACTIONS

5. HOUSING GOALS, POLICIES, AND ACTIONS

5.1 Housing Goals, Policies, and Actions

GOAL H-1: To conserve and improve the existing city housing stock and quality of life of neighborhoods.

<u>Policy</u>	<u>Action</u>
H-1.1	Assist city neighborhoods in maintaining and rehabilitating the existing housing stock as decent, safe, sanitary, and affordable housing.
	H-1.1.1 Create a formal maintenance and rehabilitation program beyond the current City code enforcement procedures to support Policy H-1.1 in coordination with the City's work with the Regional Housing Council.
H-1.2	Encourage a range of housing, economic development, and community revitalization in the city.
H-1.3	Promote the quality of life of existing communities and implementation of community housing goals through the preparation of comprehensive plans and the development review process.
H-1.4	Provide assistance to improve community surroundings and infrastructure in residential areas.
H-1.5	Encourage and facilitate economic development as an important part of provision of housing by providing jobs.
	H-1.5.1 Continue implementation of economic development efforts to provide jobs in Tumwater.

GOAL H-2: To provide a sufficient number of single family dwelling units, multi-family dwelling units, manufactured homes, and group housing to provide an affordable selection of housing to each economic segment of the Tumwater population.

<u>Policy</u>	<u>Action</u>
H-2.1	Provide sufficient, suitably zoned land for development of all housing types to accommodate the future needs for each type of housing, including

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single-family detached dwellings, accessory dwelling units, townhouses, duplexes, triplexes, fourplexes, multi-family dwellings, cottage housing, senior housing, roominghouses, group housing, and manufactured homes in manufactured home parks and on single lots.

H-2.2 Provide opportunities for a range of housing types to provide for all economic segments of Tumwater's population.

H-2.2.1 Monitor the Land Use Element and Zoning Code to ensure an adequate supply of suitably zoned land.

GOAL H-3: To provide adequate, affordable housing for residents of all income groups, including sufficient housing affordable to low and moderate-income groups.

Policy Action

H-3.1 Encourage the development of innovative plans, codes, standards, and procedures in order to take advantage of new private and public sector approaches to housing provision.

H-3.1.1 The Zoning Code allows manufactured homes on single-family lots in all residential zones. It is the intent of the Housing Element to promote the designation of a sufficient supply of land for traditional mobile/manufactured home parks—and to recognize that modular/manufactured housing on single family lots and in manufactured home parks is a viable form of housing construction.

H-3.1.2 Increase code enforcement efforts and build public private partnerships to encourage renovations of unfit structures for use as transitional or affordable housing.

H-3.2 Encourage provision of adequate building sites through appropriate land use planning and zoning codes, infrastructure supply, and overall regulatory climate.

H-3.3 Tumwater should assume its "fair share" of housing for low and moderate income groups, in cooperation with other jurisdictions in Thurston County.

H-3.3.1 Monitor land supply, census data, and housing policies to ensure Tumwater accommodates its fair share of housing

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for low and moderate income groups.

H-3.3.2 Work with Tumwater School District, Housing Authority, and other agencies and organizations to pursue grant funding and implement transitional housing strategies for families with children.

H-3.3.3 Establish a multi-family tax exemption program that gives financial incentive for developers to create multi-family structures in target areas and to set aside a percentage of units as low-income housing.

H-3.4 Tumwater should work with the other jurisdictions in Thurston County as part of the Regional Housing Council to share decision making responsibilities related to homelessness and affordable housing in Thurston County to allow for collaboration in expanding affordable housing options and sharing the planning for, identification of, and resource allocation to activities and programs intended to support individuals experiencing homelessness in Thurston County.

GOAL H-4: To provide adequate opportunities for housing for all persons regardless of age, race, color, national origin, ancestry, sex, sexual orientation, familial status, marital status, ethnic background, source of income use of federal housing assistance, or other arbitrary factors.

Policy

Action

H-4.1 Support the inclusion of living opportunities for families with children throughout the city.

H-4.2 Support and encourage a variety of housing types and price ranges through appropriate policies and regulations.

H-4.2.1 Continue the requirement for reasonable maximum lot sizes in order to create smaller lots that are more affordable and that allow a more efficient use of City services.

H-4.2.2 Encourage homeowner associations to adopt Covenants, Conditions, and Restrictions (CCRs) consistent with this policy.

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GOAL H-5: To supply sufficient, safe, suitable housing sites and housing supply to meet projected future housing needs for Tumwater over the next 20 years.

<u>Policy</u>	<u>Action</u>
H-5.1	Ensure appropriate land use designations and Zoning Code designations to provide sufficient land for housing construction.
H-5.1.1	Monitor the Land Use Element and Zoning Code to ensure an adequate supply of suitably zoned vacant land. (2.1.1)
H-5.1.2	Continue joint planning with Thurston County to plan for future growth in Tumwater.
H-5.2	Lands not suitable for development due to site constraints such as wetlands, steep slopes, geologically hazardous areas, etc., should be identified and considered when determining sufficient land for new housing in accordance with Tumwater's Conservation Plan.
H-5.3	Encourage construction practices, which exceed minimum standards. Tumwater will support the use of alternative building designs and methods that exceed the minimum standards set by Tumwater.

GOAL H-6: To promote a selection of housing that is decent, safe, and sound, in close proximity to jobs and daily activities, and varies by location, type, design, and price.

<u>Policy</u>	<u>Action</u>
H-6.1	Protect residential areas from undesirable activities and uses through aggressive enforcement of adopted City codes.
H-6.2	Provide for a dynamic mix of residential land uses and zones in order to create a diverse mix of sites available for different housing types.
H-6.2.1	Continue to monitor the available land supply, census data, and City policies to ensure a diverse mix of land for residential housing stock.
H-6.2.2	Continue to implement innovative design techniques, such

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as zero lot line developments, architectural design standards, alley houses, and attached single-family housing. Zero lot line developments are residential real estate in which the structure comes up to or very near to the edge of the property. Zero-lot-line houses are built very close to the property line in order to create more usable space.

H-6.3 Support increasing housing opportunities along urban corridors and centers.

H-6.4 Encourage provision of affordable housing near public transit routes to promote efficient transportation networks.

H-6.4.1 Continue to involve Intercity Transit in Tumwater's development review process.

H-6.5 Tumwater will maintain current Building Code standards and will use the most up to date future Code editions.

H-6.6 Increase the variety of housing types outside of corridors and centers of appropriate intensities with supporting design guidelines to meet the needs of a changing population.

GOAL H-7: To ensure that housing is compatible in quality, design, and density with surrounding land uses, traffic patterns, public facilities, and environmentally sensitive areas.

<u>Policy</u>	<u>Action</u>
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H-7.1	Support the stability of established residential neighborhoods through appropriate plans and codes.
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H-7.1.1	Continue to implement design standards for multi-family and attached single-family dwellings in order to ensure compatibility with existing neighborhoods.
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H-7.2	Assure housing will be well maintained and safe.
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H-7.3	Enhance the appearance of and maintain public spaces in residential areas.
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H-7.4	Promote community involvement to achieve neighborhood improvement.
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GOAL H-8: To support healthy residential neighborhoods which continue to reflect a high degree of pride in ownership or residency.

<u>Policy</u>	<u>Action</u>
H-8.1	Support the stability of established residential neighborhoods.
H-8.2	Assure housing will be well maintained and safe.
	H-8.2.1 Protect residential areas from undesirable activities and uses through aggressive enforcement of adopted City codes.
H-8.3	Enhance the appearance of and maintain public spaces in residential areas.
H-8.4	Promote community involvement to achieve neighborhood improvement.
	H-8.4.1 Encourage neighborhood meetings to discuss community issues as situations and concerns arise.
H-8.5	Encourage home ownership for Tumwater residents.

GOAL H-9: To encourage a variety of housing opportunities for those with special needs, particularly those with problems relating to age or disability.

<u>Policy</u>	<u>Action</u>
H-9.1	Require housing to meet the needs of those with special housing requirements without creating a concentration of such housing in any one area.
H-9.2	Assist social service organizations in their efforts to seek funds for construction and operation of emergency, transitional, and permanent housing.
H-9.3	Support and plan for assisted housing opportunities using federal, state, or local aid.
H-9.4	Encourage and support social and health service organizations, which

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offer support programs for those with special needs, particularly those programs that help people remain in the community.

- H-9.5 Encourage alternative housing strategies for homeless youth, which may include Host Homes.

GOAL H-10: To provide housing that is compatible and harmonious with existing neighborhood character through use of innovative designs that enhance the appearance and quality of Tumwater's neighborhoods.

Policy Action

- H-10.1 Encourage innovation and variety in housing design and development. Tumwater will support efforts to build housing with unique individual character, which avoids monotonous neighborhood appearance.

- H-10.2 Multi-family residential housing should be subject to design criteria that relate to density, structure bulk, size and design, landscaping, and neighborhood compatibility.

- H-10.2.1 Continue to implement multi-family housing design standards.

GOAL H-11: To provide housing to accommodate Tumwater's housing needs in the urban growth area and make the most efficient use of infrastructure and services.

Policy Action

- H-11.1 Reference the Transportation Element and anticipated transportation impacts when making housing decisions affecting the location and density of housing.

- H-11.2 Reference utility plans and the impact of housing decisions on capital improvements planning.

- H-11.3 Encourage the construction of affordable housing, including cottage housing and accessory dwelling units, within a half mile or twenty minute walk of an urban center, corridor or neighborhood center with access to goods and services to provide access to daily household needs.

**HOUSING ELEMENT
CHAPTER 5**

HOUSING GOALS, POLICIES, AND ACTIONS

GOAL H-12: To encourage urban growth within the city limits with gradual phasing outward from the urban core.

<u>Policy</u>	<u>Action</u>
H-12.1	Encourage the construction of housing on vacant property within the city and the redevelopment of underdeveloped property within residential areas to minimize urban sprawl and associated public service costs.
H-12.1.1	Continue to review and revise, as necessary, City Development Standards deemed unnecessary and make development more expensive and/or difficult.
H-12.1.2	Continue to support high-density zoning within specific areas of the city that have the infrastructure and services to support high-density housing.
H-12.1.3	Continue to implement minimum density levels for all residential zoning districts to ensure efficient use of the urban growth area.
H-12.1.4	Work cooperatively with Thurston County to provide for more efficient and orderly annexations to facilitate urban service delivery.

GOAL H-13: Ensure consistency with RCW 36.70A.070(2)(c) which requires sufficient land be available for all types of housing including manufactured housing.

<u>Policy</u>	<u>Action</u>
H-13.1	Maintain the manufactured home park district zoning in appropriate areas in order to prevent conversion of affordable housing to other uses without replacement.
H-13.1.1	Encourage manufactured housing park district zoning to locate near transit services.
H-13.2	When locating zones and designations for manufactured home parks, carefully consider the risks from natural hazards, such as flooding and liquefaction, and the impacts of those hazards on the future residents of those manufactured home parks, Tumwater's emergency responders, and

the city as a whole.

6. REGULATORY BARRIER ASSESSMENT

6.1 Introduction

A number of local, state, and federal regulations make housing more expensive. These regulations are designed to make housing more safe. However, there are instances where the benefit received from a particular regulation may not be worth the corresponding cost. This chapter of the Housing Element will focus on those regulations under Tumwater's control, and will recommend changes to certain regulations in order to promote affordable housing. There are also state and federal regulations that may increase the cost of housing.

6.2 Community Perceptions

For a variety of reasons, the public remains concerned about the fast rate of growth in the Puget Sound region. The public, for many understandable reasons, has the perception that growth is not being controlled properly. Because of this and other reasons, citizens have organized and suggested changes.

However, oftentimes citizens oppose projects during the permitting process that would increase the supply of housing, thus tending to drive housing costs higher. While these housing applications are often ultimately approved, they are often approved with additional conditions and time delays. For example, in 2011 the Habitat for Humanity development on Henderson Boulevard (Shepherds Grove) was appealed by some residents of adjacent subdivisions. The appeal resulted in a several week delay and the need for Habitat for Humanity to spend about \$40,000 on a "Transfer of Development Right" in order to proceed with the project. The appeal added significant cost and delay for this affordable housing project. In some instances, these delays and conditions can make it unfeasible to proceed with the project or at least drive up project costs and subsequent rents or housing costs. Depending upon your point of view, these conditions could be perceived as a vital step in the process, or of little or no value.

Tumwater has taken major steps to streamline the development process while taking the views of citizens into consideration. Probably the most significant single action taken in this regard was implementation of a hearing examiner system. Tumwater has employed a hearing examiner to conduct hearings and make decisions on all discretionary land use permits, such as rezones, conditional use permits, preliminary plats, etc. The hearing examiner considers the staff report, public hearing testimony, environmental information, and the site itself to issue a decision based on applicable policies and codes. This process allows a more objective approach to site specific land use decisions, which reduces time delays and costs.

6.3. Growth Management

The Growth Management Act (RCW 36.70) seeks to control growth by channeling it into urban growth areas in order to provide more orderly and efficient service provision and to reduce sprawl. The Act also specifically authorizes charging impact fees in order to offset the costs of new development. It also directs jurisdictions to “encourage the availability of affordable housing.”

6.4 Permitting

The Community Development Department is a full service, one stop department, composed of planners, engineers, and building/fire inspectors, that is especially suited to guiding applicants through the approval process and responding quickly to development requests. While a slow permitting process can add to housing costs, research of permit application history in Tumwater has shown that the average permit processing time is very good. Those that require public hearings are inherently more time consuming than those that do not. Similarly, a more straightforward application, such as a single-family house on a lot of record, is much simpler and less involved than a 50-house subdivision and associated construction permits.

6.5 Infrastructure

City Development Standards, adopted through the *Tumwater Development Guide Manual*, sets standards for various road, water, and sewer projects. For example, a residential subdivision is required to install water and sewer lines of a certain type and dimension. Likewise, roads and sidewalks are required to be a certain width, and so forth.

Alternate street designs are allowed under the *Tumwater Development Guide Manual*, which is based on guidance provided in the National Association of City Transportation Officials, *Urban Streets Design Guide*, and by other organizations. These optional design methods for Neighborhood Collector and Local Residential Streets allow reduced right-of-way widths, which should reduce development costs while improving the human scale of neighborhoods.

6.6 Zoning Code

Zoning ordinances regulate the use of land through controls on density, lot sizes, setbacks, storm water management, and the placement and mix of residential, commercial, and industrial uses. Zoning codes have been used since the late 1800s to protect property values and ensure an orderly arrangement of land uses within a jurisdiction.

Tumwater Zoning Code provides for increased density (number of units per acre) in target areas to support a greater range of housing options. Minimum lot sizes are supportive of diversity in housing stock. Similarly, zero lot line developments, where the structure is located directly on the lot line on one side of the lot in order to provide more usable side yard space on a smaller lot, are currently allowed in all residential zones.

6.7 Building Code

The International Residential Code beginning July 1, 2004 regulates the construction of all structures in Tumwater by setting minimum standards for building construction to ensure safety. The International Residential Code is adopted by all jurisdictions in Washington State, with no or minor changes. For residential construction, Tumwater does have the option of increasing or decreasing the regulations by ordinance for residential structures of more than three dwelling units. Any change to the regulations for single-family and duplex units does require approval by the State Building Code Council, which amounts to significant disincentive to following this route.

As mentioned previously, however, the International Residential Code is designed to be a minimum standard. As such, any minimization of those standards would have a corresponding impact on life safety.

There are possible cost saving measures that meet the International Residential Code standards. For example, use of pre-engineered building components can significantly cut labor costs. While many of these components are as much as 10% more expensive to purchase, they can save 25% of labor costs in installation. Engineered roof trusses are a good example of this type of component. Designing houses to take maximum advantage of lumber and truss span capabilities, such as 24-inch on-center rather than 16-inch on-center framing, and two instead of three stud corners. These and other simple measures can result in substantial cost savings to the builder and subsequent buyer of housing.

There are many options for housing construction available in the International Residential Code that are rarely used. This may be because builders are unaware of these possibilities or are simply accustomed to building in a certain way. Another possible reason may be that the perception is that the housing market will not bear such design innovations. There is an opportunity for the builders and City building officials to innovate to help contain or reduce housing prices. This could be facilitated through meetings or exchanges.

6.8 Conclusion

This chapter has attempted to identify barriers to affordable housing that are internal to City processes and that affect housing affordability, as well as regulations that can be changed to heighten housing affordability. It also examined the various roles and responsibilities of adjacent jurisdictions, the Housing Authority of Thurston County, and builders/developers in providing affordable housing. This chapter also examined existing provisions in Tumwater Codes that promote affordability, but are rarely used in Tumwater. It is hoped that their identification here and the suggested subsequent meetings between Tumwater and builders will stimulate their use.

7. CITYWIDE HOUSING NEEDS

7.1 Introduction

Chapter 4 of the Housing Element examined the housing needs of low and moderate income people in Tumwater. This chapter will focus on the housing needs of the remainder of the Tumwater population.

7.2 Housing Needs

Housing needs for middle-income groups tend to be associated primarily with housing, as opposed to low-income groups, which may have a number of additional needs because of their very low incomes. The State of Washington and the federal Department of Housing and Urban Development, for purposes of determining eligibility for assistance, define any household paying more than 30% of household income on housing expenses as “cost-burdened.” For example, a household earning \$100,000 per year but spending more than \$30,000 for housing is cost burdened.

In 2015, the Multiple Listing Service reported that the average price of a single-family house in Tumwater is \$289,970; Census figures for median house value show a value of \$72,000 in 1990, \$141,000 in 2000, and \$274,000 in 2015.

This means families that would normally purchase a home may be unable to because of rising housing costs. The 1990 census showed that 14% of single-family homeowners in Tumwater paid 30% or more of their income for housing costs. In 2000, 20% of single-family households paid 30% or more of their gross income for housing costs. In 2015, 36% of single-family households paid 30% or more of their income for housing. Thirty percent of a family's gross income is a common indicator of housing affordability, including mortgage/rent and utilities. Many people that purchased a house years ago could not purchase the house they live in now at today's market rate.

The situation for renters of housing is worse. The 1990 census data shows that the median rent in Tumwater in 1990 was \$442. In 2000, the median rent was \$609, and in 2015, median rent was \$1,056.00 excluding utilities. The 1990 census showed that 36% of the renters in Tumwater paid 30% or more of their gross income in rent. Of this group, nearly 28% of the renters in Tumwater paid 35% or more of their gross income for rent. In 2000, 36% of the renters in Tumwater paid 30% or more of their gross income for rent, and in 2015, 49% of renters pay more than 30% for housing. Paying this amount of salary for housing costs means that money that would normally be used for other household expenses, such as cars, insurance, day care, even clothing and food, are instead used for shelter.

For this income group, any measures that can lower housing costs would be helpful.

The cost saving building practices identified in Chapter 6 would make incremental improvement in housing costs by encouraging a more diverse housing stock.

There are income groups in Tumwater of which housing costs are not a daily concern. The concerns for these people revolve around neighborhood stability and vitality and the protection of housing investments rather than day-to-day housing affordability. While this group could benefit from regulatory and private industry changes to improve housing affordability, these changes are not necessary in order to provide adequate housing for this income group.

7.3 Conclusion

This Chapter describes the housing needs of Tumwater today and over the next 20 years. Current and projected data indicates that a high percentage of the people in Tumwater are paying more per month for housing than they should, based on state and federal criteria. This trend is increasing and it indicates a need for a broader range of housing options and more diverse housing stock.

8. SUFFICIENT LAND FOR HOUSING

8.1 Introduction

The Growth Management Act requires Tumwater to identify sufficient land to provide for a variety of housing types for the next 20 years. Providing an adequate number of suitably zoned lots for different types of housing will help curb prices for land, which is a significant factor in housing costs.

This chapter will also analyze current vacancy rates for housing in Tumwater, which shows housing units available for occupancy. A very competitive housing market tends to drive up the costs of housing for purchase and rent.

8.2 Identification of Expected Population

Population growth is driven by two factors: net migration, people moving in minus people moving out, and natural increases, births minus deaths. Since 1960, most growth in Thurston County has been due to immigration. Little change in birth rates occurred between 2000 and 2015. Between 2000 and 2010, an average of 3,500 people moved to Thurston County per year, which is 77% of total growth. While much of this immigration was likely due to the relatively stable economy in Thurston County, it is likely that the increasing cost of living in the Seattle metropolitan area played a role as well, as individuals from the metropolitan area looked for ways to reduce escalating costs of living, particularly in housing. Immigration since 2010 has slowed to 1,900 new residents per year. It also accounts for a smaller proportion of total growth (63%).

Tumwater's population in 2002 of 12,730 increased to today's 21,939, an increase of 58%. Population is expected to see similar growth over the next 20 years reaching approximately 35,000 people in the incorporated area and 42,000 people within the Urban Growth Area. These population figures will be the basis on which all of Tumwater's Growth Management Act planning documents will be based.

8.3 Identification of Sufficient Land for Housing

The Growth Management Act requires Tumwater to identify and plan for 20 years of population growth. An important part of this equation is providing sufficient land area to accommodate sufficient housing units to house adequately the people expected to live in Tumwater in the next 20 years. To accomplish this goal, the Housing Element will work in concert with the Land Use Element. The Housing Element will identify how many housing units of each type; single family, multi-family, or manufactured, will be needed. This estimation of housing units will then be coordinated with the Land Use Element in order to provide sufficient land for housing within the existing city limits

and the urban growth area.

The following projection of housing units shown in Table 6 is anticipated to meet the needs of 12,741 additional people.

**HOUSING ELEMENT
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Table 6. Housing Units Needed for 20-Year Planning Period

Planning District	2015 Total Dwellings	2015 Single Family Units	2015 Multi- Family Units	2015 Manufactured Units	2035 Total Dwellings	2035 Single Family Units	2035 Multi- Family Units	2035 Manufactured Units	Total Capacity	Total Single Family Capacity	Total Multi- Family Capacity	Total Manufactured Capacity
Airport	244	201	33	10	894	717	168	10	1,125	760	356	10
Brewery	80	48	32	-	217	48	169	-	248	58	190	-
Deschutes	941	719	218	4	1,055	800	251	4	1,109	830	275	4
Littlerock	1,566	1,112	243	211	3,644	2,587	847	211	3,966	3,117	638	211
Mottman-Black Lake	48	44	-	4	180	159	17	4	231	203	24	4
Southeast Capitol Blvd.	1,599	735	739	125	2,026	985	916	125	2,206	1,022	1,059	125
Trosper	1,087	308	433	345	1,986	942	700	345	2,250	1,109	796	345
Tumwater Hill	3,143	1,752	1,311	80	3,692	2,133	1,479	80	3,941	2,243	1,618	80
New Market	406	59	345	2	461	72	387	2	489	80	407	2
Bush Prairie	1,299	1,045	212	42	1,911	1,554	315	42	2,069	1,662	365	42
Southside UGA	627	284	80	263	1,814	1,207	344	263	2,104	1,375	466	263
Westside UGA	582	338	38	206	1,287	986	95	206	1,533	1,189	138	206
TOTAL	11,622	6,645	3,684	1,292	19,167	12,190	5,688	1,292	21,272	13,648	6,332	1,292

Source: Thurston Regional Planning Council, Profile 2015

Notes: The City of Tumwater started the update process in 2015 using data from 2015 and did not receive 2016 data until it was too late to incorporate in the update process.

Total Capacity, Total Single Family Capacity, and Total Multi-Family Capacity were updated during the 2017 and 2018 Comprehensive Plan amendment cycles.

Multi-Family Capacity updated during 2017 Comprehensive Plan Update Process.

8.4 Sufficient Land for Specific Housing Needs

The Growth Management Act also requires that Tumwater provide sufficient land for government assisted housing, housing for low-income people, group homes, and foster care homes.

8.4.1 Government Assisted Housing

Government assisted housing means federal, state, local, or some combination of funding that makes the housing possible. This usually takes the form of Section 8 housing through the federal government or federal low interest construction loans for low-income people. The GMA requires that sufficient land for such housing be made available. Because this is a residential use, sufficient land for residential housing will insure that sufficient land is available for government-assisted housing. When possible, this type of housing should be located on or near public transit routes, because very often low income groups will be dependent on public transportation. In addition, Chapter 6 has identified specific measures to reduce housing costs, in particular smaller required lot sizes, use of low impact stormwater management, and improved provisions for accessory housing will have beneficial impacts on government assisted housing.

8.4.2. Housing for Low Income People

Low income people typically rent housing that is priced so that lower income groups are able to afford it. Very often, this housing falls into the government assisted category explained above. As such, sufficient land area for this type of housing is provided in much the same way as government assisted housing, by providing sufficient residentially zoned vacant land, especially for multi-family housing, and adequate single family zoning in conjunction with small lot sizes and smaller dwellings, in the 1,000 sq. ft. to 1,500 sq. ft. range. Again, whenever possible, this housing should be located on or near public transit routes.

8.4.3. Manufactured Housing

Manufactured housing refers to housing that is mobile in nature and permitted under federal Housing and Urban Development standards, which are less restrictive than the Uniform Building Code standards. These houses can be less expensive than conventional "stick-built" homes, making them attractive for people wishing to move out of rental housing into single-family housing. Historically, these housing units looked more like trailers than houses, but this has changed dramatically. Because of the styling changes and relatively recent housing cost increases, the Housing Element recommends the continuation of allowing manufactured housing on single-family lots. This will appreciably open up the supply of vacant land for this use, which will help

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control prices.

8.4.4. Multi-Family Housing

The issue of Multi-family housing has been addressed elsewhere in this chapter of the Housing Element. The key to providing adequate multi-family housing from Tumwater's perspective is to make certain that adequate suitably zoned acreage is available. The Housing Element identifies the number of the various housing units needed to serve 20 years of population growth, including multi-family. The Land Use Element will then designate adequate acreage on which to build the various housing units. Historically, multi-family units are sometimes perceived as a detriment to the community. This problem can largely be overcome by implementing reasonable design standards for apartments that enable this type of housing to blend better and be more compatible with surrounding neighborhoods.

8.4.5. Group and Foster Care Homes

Group homes are facilities that care for people with a variety of disabilities, including adult family homes, which make it possible for them to live with assistance. Foster care homes provide homes for children that for some reason are unable to live with their biological parents. In 1990, Tumwater amended the Zoning Code to allow group and foster care homes as a permitted use in all zoning classifications, as required by the State of Washington. Because of these amendments, group and foster care facilities are adequately provided for currently.

8.5 Vacancy Rates

According to 2014-15 Census information, 6% of all housing units in Tumwater are vacant, up from 5% reported in the 2000 census. Any vacancy rate of less than 5% is considered a tight rental market.

8.6 Conclusion

This chapter has projected the number of housing units necessary to house the Tumwater population over the next 20 years. Projections were made for 12,741 additional people to live in Tumwater in 2035,² and 8,000 new housing units of various types. It also identifies the Land Use Element as the operative document in ensuring adequate vacant land to provide housing for the next 20 years.

² The City of Tumwater started the update process in 2015 using data from 2015 and did not receive 2016 data until it was too late to incorporate in the update process.

9. EXISTING AND FUTURE HOUSING PROVISIONS

9.1 Introduction

The Growth Management Act requires that provisions be identified for existing and future housing needs. In fact, for the most part this has been done in various sections of the preceding six chapters of the Housing Element. This chapter will recap the various housing needs and provisions identified for addressing those needs, expanding where necessary.

9.2 Protection of Existing Housing Stock

One of the most important methods to maintain and generate an adequate supply of housing is to retain existing housing. The existing housing stock in Tumwater is quite good. Policies to protect the quality of existing neighborhoods and encourage maintenance and improvement of the housing stock are addressed in the goals, policies, and actions portion of the Housing Element, Chapter 5.

9.3 Low and Moderate Income Provisions

Low and moderate income people have a variety of needs in addition to the provision of adequate shelter. Of course, lack of adequate shelter is usually foremost among a multitude of needs. Having this exceedingly small income makes obtaining shelter very difficult. In addition, there are many reasons for this low income status, such as mental and physical challenges that require assistance. This assistance is typically provided through public and private human service agencies. The most effective way for Tumwater to assist the needs of low income people in the Tumwater community is through funding assistance to established human resource agencies.

9.4 Regulatory Barriers to Affordable Housing

There are a number of federal, State, and local regulations that tend to make housing more expensive. These regulations are designed to protect the environment and make housing safer. However, these regulations also can cause a corresponding increase in housing costs. Federal and State regulations are of course outside Tumwater's control. Chapter 6, however, makes a detailed assessment of our own regulatory structure and makes specific recommendations regarding changes to ease the burden of housing affordability. Please refer to Chapter 6 for specific suggested code amendments. Chapter 6 also delineates a number of existing provisions, currently allowed under the Tumwater Municipal Code, that help make housing more affordable. These provisions are highlighted to encourage their use in the future.

9.5 Sufficient Land for 20 Years of Housing

An important component of affordable housing is providing sufficient vacant land for a variety of housing types. Chapter 8 examines this issue in detail. Providing sufficient land for housing can only be accomplished in conjunction with the 20-year population projection. With an accurate population projection, the Housing Element can estimate the number of each type of housing unit necessary to house the Tumwater population. The Land Use Element can then ensure a sufficient supply of suitable vacant lots that will help curb land prices, which are a major determining factor in housing costs.

Another land related housing cost is lot size. Large lot sizes are of course more expensive, and result in higher housing prices, costlier infrastructure improvements because of increased sprawl, increased environmental degradation, and an accelerated use of the land use base.

9.6 Employment

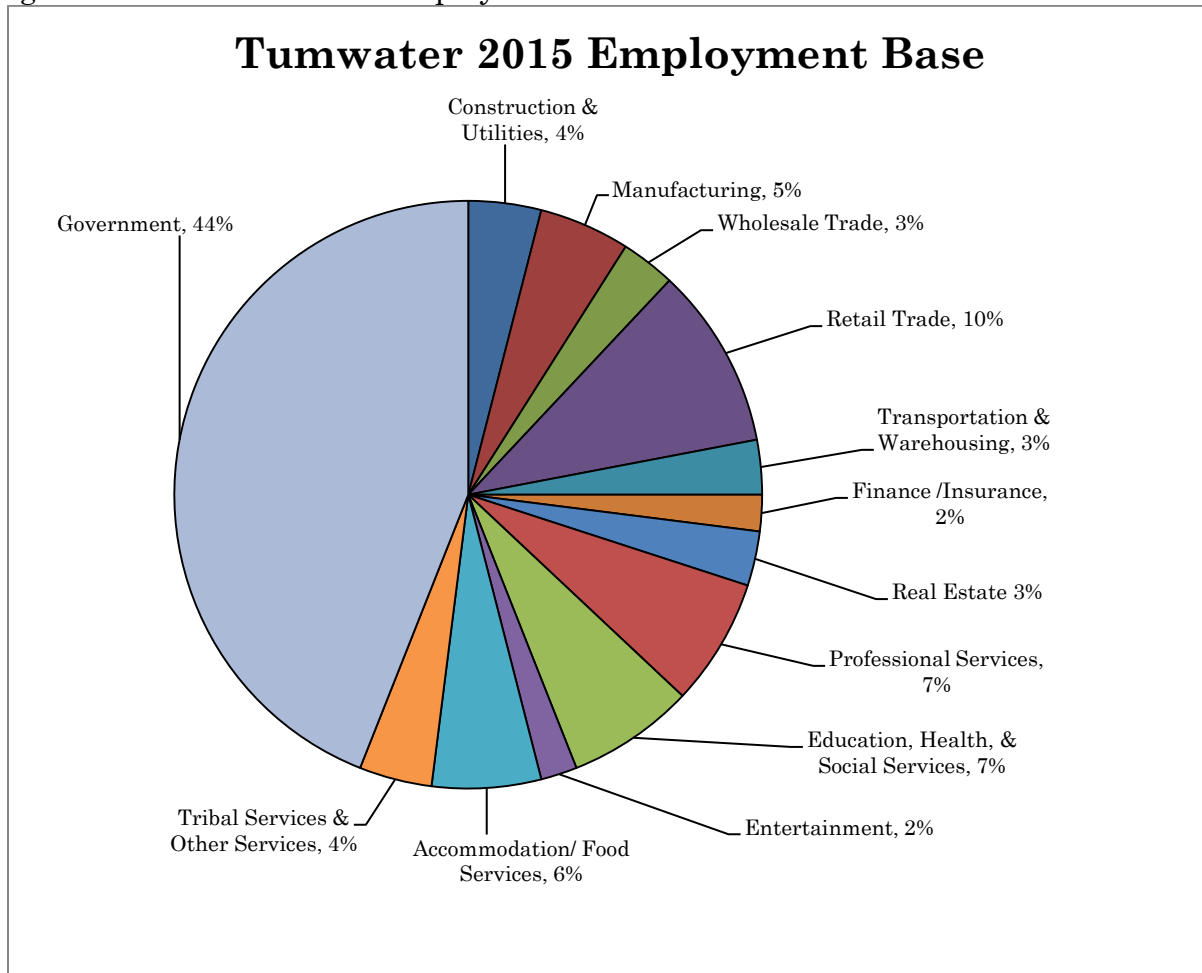
Employment quantity and quality is an important consideration when considering housing affordability. The availability of jobs that pay a wage adequate to enable people to afford housing is of paramount importance. Much of the information included in this section is compiled from The Profile, assembled by the Thurston Regional Planning Council.

9.6.1 Thurston County Employment Base

Industries and businesses that produce goods that are exported to surrounding areas, such as foreign countries, other states, and other communities, are referred to as "basic" industries. These firms form the backbone of the local economy by exporting goods out of the area and importing dollars into the area. An excellent example of a basic industry is Cardinal CG Glass. A "non-basic" industry is in a support role to the basic industries in a community. An example of a non-basic industry is a shopping center that provides goods to basic industries and their employees.

In Thurston County, State government is the largest basic industry, comprising 25% of the jobs. The proportion of people employed in government jobs in Thurston County is more than double the percentage of the entire State, with local, State, and federal employment together. This is common in counties that have the seat of state government.

Figure 2. Tumwater 2015 Employment Base



Unemployment rates continue to fall in Thurston County and payrolls expand. Compared to 2010, overall employment has increased by 2% and unemployment has declined 35%. Non-farm employment has increased by 9%. Government employment expanded slightly (0.5%) since 2010.

Increasing taxable sales since 2010 were especially notable in e-commerce (up 107%), transportation and warehousing (up 93%), specialty food and beverage stores (up 107%) and professional, scientific, and technical services (up 57%). Sales for all industries were up 2%.

Personal income in Thurston County has increased 15% since 2010 while the population has increased 5%.

9.7 Unemployment

The unemployment rate is important for the obvious reason that unemployed people have a difficult time obtaining and retaining housing. Unemployment trends in Thurston County have closely mirrored national unemployment figures. Thurston County's unemployment rate was 8.2% in 1980, 4.8% in 1990, and 5.0% in 2000. Currently it is at 4.1%. The national unemployment rate is 4.9%.

9.8 Conclusion

This chapter has augmented other chapters of the Comprehensive Plan in order to identify provisions for existing and projected housing needs. Most indications show that Tumwater is meeting the housing needs of the existing population. The Housing Element has identified two emphasis areas: homelessness and housing mix that warrant additional review and planning. Of special concern are the increasing homelessness trends among children, disabled, and the aging populations in the community.



LOCAL GOVERNMENT DIVISION GROWTH MANAGEMENT SERVICES

Periodic Update Checklist for Fully-Planning Cities

Overview: This checklist is intended to help cities that are fully planning under the Growth Management Act (GMA) conduct the “periodic review and update” of ***comprehensive plans*** and ***development regulations*** required by [RCW 36.70A.130 \(4\)](#). This checklist identifies components of comprehensive plans and development regulations that may need updating to reflect the latest local conditions or to comply with GMA changes since the last periodic update cycle (2015-2018).

Statutory changes adopted since 2015 are emphasized in highlighted text to help identify new GMA requirements that may not have been addressed during the last update or through other amendments outside of the required periodic update process.

What’s new: For the 2024-2027 update cycle, Commerce has updated and streamlined periodic update resources including checklists, guidebooks and a [webpage](#) to serve you better. A checklist and guidebook for *partially-planning jurisdictions* will be available prior to their 2026-2027 updates. A separate checklist is available for counties.

2021-2022 Legislative Session:

[HB 1220](#) substantially amends housing-related provisions of the GMA, [RCW 36.70A.070\(2\)](#). Please refer to the following Commerce housing webpages for further information about the new requirements: [Updating GMA Housing Elements](#) and [Planning for Housing](#).

[HB 1241](#) changes the periodic update cycle described in RCW 36.70A.130. Jurisdictions required to complete their update in 2024 now have until December 31, 2024 to finalize their review and submit to Commerce. Jurisdictions required to complete their updates in 2025-2027 are still required to submit prior to June 30th of their respective year. Additionally, jurisdictions that meet the new criteria will be required to submit an implementation progress report five years after the review and revision of their comprehensive plan.

[HB 1717](#) adds new requirements in [RCW 36.70A.040](#) and [RCW 36.70A.190](#) regarding tribal participation in planning efforts with local and regional jurisdictions.

[HB 1799](#) adds a new section to the GMA, [RCW 36.70A.142](#), requiring some local governments to begin providing separated organic material collection services within their jurisdictions in order to increase volumes of organic materials collected and delivered to composting and other organic material management facilities.

[SB 5593](#) adds new elements to RCW [36.70A.130\(3\)](#) regarding changes to planning and/or modifying urban growth areas.

City

Staff contact, phone + email

[SB 5818](#) promotes housing construction in cities through amendments to and limiting appeals under the state environmental policy act (SEPA) and the GMA, amending [RCW 36.70A.070\(2\)](#).

Local governments should review local comprehensive plan policies, countywide planning policies and multicounty planning policies (where applicable) to be consistent with the new requirements.

Checklist Instructions

With the most recent versions of your comprehensive plan and development regulations in hand, fill out each item in the checklist, answering the following questions:

Is this item addressed in your current plan or development regulations? If YES, fill in the form with citation(s) to where in the plan or regulation the item is addressed. Where possible, we recommend citing policy or goal numbers by element rather than page numbers, since these can change. If you have questions about the requirement, follow the hyperlinks to the relevant statutory provision or rules. If you still have questions, visit the Commerce [Periodic Update webpage](#) or contact the [Commerce planner assigned to your region](#).

Is amendment needed to meet current statute? Check YES to indicate a change to your plan will be needed. Check NO to indicate that the GMA requirement has already been met. Local updates may not be needed if the statute hasn't changed since your previous update, if your jurisdiction has kept current with required inventories, or if there haven't been many changes in local circumstances.

Use the "Notes" column to add additional information to note where your city may elect to work on or amend sections of your plan or development regulations, to call out sections that are not strictly required by the GMA, or to indicate if the item is not applicable to your jurisdiction.

Submit your checklist! This will be the first deliverable under your periodic update grant.

PlanView system and instructions: Completed checklists can be submitted through Commerce's PlanView portal. The PlanView system allows cities and counties to submit and track amendments to comprehensive plans or development regulations online, with or without a user account. You can also submit via email: reviewteam@commerce.wa.gov Fill out and attach a [cover sheet](#), a copy of your submittal and this checklist. *Please be advised that Commerce is no longer accepting paper submittals.*

For further information about the submittal process please visit Commerce's [Requirements and procedures for providing notice to the state](#) webpage.

Need help?

Please visit Commerce's [periodic update webpage](#) for additional resources

or contact:

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(Ctrl + Click each element)

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UTILITIES

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Section I: Comprehensive Plan Elements

Land Use Element

Consistent with countywide planning policies (CWPPs) and RCW 36.70A.070(1)

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
<p>New 2021-2022 legislation ESSB 5593: changes to RCW 36.70A.130 regarding UGA size, patterns of development, suitability and infrastructure.</p> <p>Coordinate these efforts with your county</p>			
<p>a. The element integrates relevant county-wide planning policies into the local planning process, and ensures local goals and policies are consistent. For jurisdictions in the central Puget Sound region, the plan is consistent with applicable multicounty planning policies. RCW 36.70A.210 WAC 365-196-305</p> <p>Coordinate these efforts with your county</p>			
<p>b. A future land use map showing city limits and UGA boundaries. RCW 36.70A.070(1) and RCW 36.70A.110(6) WAC 365-196-400(2)(d), WAC 365-196-405(2)(i)(ii)</p>			
<p>c. Consideration of urban planning approaches that increase physical activity. RCW 36.70A.070(1) and WAC 365-196-405(2)(j). Additional resources: Transportation Efficient Communities, The Washington State Plan for Healthy Communities, Active Community Environment Toolkit</p>			
<p>d. A consistent population projection throughout the plan which should be consistent with the county's sub-county allocation of that forecast and housing needs. RCW 36.70A.115, RCW 43.62.035 and WAC 365-196-405(f)</p>			

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
<p>e. Estimates of population densities and building intensities based on future land uses and housing needs. RCW 36.70A.070(1), WAC 365-196-405(2)(i)</p> <ul style="list-style-type: none"> For cities required to plan under the Buildable Lands Program, RCW 36.70A.215 amended in 2017, some jurisdictions may need to identify reasonable measures to reconcile inconsistencies. See Commerce's Buildable Lands Program page. 			
<p>f. Provisions for protection of the quality and quantity of groundwater used for public water supplies. RCW 36.70A.070(1); WAC 365-196-405(1)(c); WAC 365-196-485(1)(d)</p>			
<p>g. Identification of lands useful for public purposes such as utility corridors, transportation corridors, landfills, sewage treatment facilities, storm water management facilities, recreation, schools, and other public uses. RCW 36.70A.150 and WAC 365-196-340</p>			
<p>h. Identification of open space corridors within and between urban growth areas, including lands useful for recreation, wildlife habitat, trails, and connection of critical areas. RCW 36.70A.160 and WAC 365-196-335</p>			

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
<p>i. If there is an airport within or adjacent to the city: policies, land use designations (and zoning) to discourage the siting of incompatible uses adjacent to general aviation airports. RCW 36.70A.510, RCW 36.70.547</p> <p>Note: The plan (and associated regulations) must be filed with the Aviation Division of WSDOT. WAC 365-196-455</p>			
<p>j. Where applicable, a review of drainage, flooding, and stormwater run-off in the area and nearby jurisdictions and provide guidance for corrective actions to mitigate or cleanse those discharges that pollute waters of the state. RCW 36.70A.070(1) and WAC 365-196-405(2)(e)</p> <p>Note: RCW 90.56.010(27) defines waters of the state.</p> <p>Additional resources: Protect Puget Sound Watersheds, Building Cities in the Rain, Ecology Stormwater Manuals, Puget Sound Partnership Action Agenda</p>			
<p>k. Policies to designate and protect critical areas including wetlands, fish and wildlife habitat protection areas, frequently flooded areas, critical aquifer recharge areas, and geologically hazardous areas. In developing these policies, the city must have included the best available science (BAS) to protect the functions and values of critical areas, and give “special consideration” to conservation or protection measures necessary to preserve or enhance anadromous fisheries.</p> <p>RCW 36.70A.030(6), RCW 36.70A.172, WAC 365-190-080</p> <p>Best Available Science: see WAC 365-195-900 through -925</p>			

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
l. If forest or agricultural lands of long-term commercial significance are designated inside city: a program authorizing Transfer (or Purchase) of Development Rights. RCW 36.70A.060(4) , RCW 36.70A.170			
m. If there is a Military Base within or adjacent to the jurisdiction employing 100 or more personnel: policies, land use designations, (and consistent zoning) to discourage the siting of incompatible uses adjacent to military bases. RCW 36.70A.530(3) , WAC 365-196-475			
n. New section RCW 36.70A.142; new 2021-2022 legislation HB 1799: Development regulations newly developed, updated, or amended <i>after January 1, 2025</i> allow for the siting of organic materials (OM) management facilities as identified in local solid waste management plans (SWMP) to meet OM reduction and diversion goals. Siting must meet criteria described in RCW 70A.205.040(3) See also RCW 36.70.330 . For applicability, see RCW 70A.205.540			

Housing Element

In the 2021 legislative session, HB 1220 substantially amended the housing-related provisions of the Growth Management Act (GMA), RCW 36.70A.070 (2). Local governments should review local comprehensive plan policies and countywide planning policies to be consistent with the updated requirements. Please refer to Commerce's housing webpages for further information about the new requirements:

Updating GMA Housing Elements and Planning for Housing

a. Goals, policies, and objectives for the preservation, improvement, and development of housing. RCW 36.70A.070(2)(b) and WAC 365-196-410(2)(a)			
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	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
b. Within an urban growth area boundary, consideration of duplexes, triplexes, and townhomes. RCW 36.70A.070(2)(c) amended in 2021, WAC 365-196-300			
c. Consideration of housing locations in relation to employment locations and the role of ADUs. RCW 36.70A.070(2)(d) amended in 2021			
d. An inventory and analysis of existing and projected housing needs over the planning period, by income band, consistent with the jurisdiction's share of housing need, as provided by Commerce. RCW 36.70A.070(2)(a) amended in 2021, WAC 365-196-410(2)(b) and (c)			
e. Identification of 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. RCW 36.70A.070(2)(c) amended in 2021, WAC 365-196-410(e) and (f)			
f. Adequate provisions for existing and projected housing needs for all economic segments of the community. RCW 36.70A.070(2)(d) amended in 2021, WAC 365-196-010(g)(ii) , WAC 365-196-300(f) , WAC 365-196-410 and see Commerce's Housing Action Plan (HAP) guidance: Guidance for Developing a Housing Action Plan			

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
<p>g. Identify local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing, including:</p> <ul style="list-style-type: none"> • Zoning that may have a discriminatory effect; • Disinvestment; and • Infrastructure availability <p><u>RCW 36.70A.070(e)</u> new in 2021</p>			
<p>h. Establish policies and regulations to address and begin to undo racially disparate impacts, displacement, and exclusion in housing caused by local policies, plans, and actions.</p> <p><u>RCW 36.70A.070(2)(f)</u> new in 2021</p>			
<p>i. Identification of areas that may be at higher risk of displacement from market forces that occur with changes to zoning development regulations and capital investments.¹</p> <p><u>RCW 36.70A.070(2)(g)</u> new in 2021</p> <p>Establish anti-displacement policies, with consideration given to the preservation of historical and cultural communities as well as investments in low, very low, extremely low, and moderate-income housing; equitable development initiatives; inclusionary zoning; community planning requirements; tenant protections; land disposition policies; and consideration of land that may be used for affordable housing.</p> <p><u>RCW 36.70A.070(2)(h)</u> new in 2021</p>			

¹ This work should identify areas where anti-displacement tools may be applied, but may not need to be in the comprehensive plan. See Commerce's housing guidance: [Updating GMA Housing Elements - Washington State Department of Commerce](#)

Capital Facilities Plan (CFP) Element

To serve as a check on the practicality of achieving other elements of the plan, covering all capital facilities planned, provided, and paid for by public entities including local government and special districts, etc. including water systems, sanitary sewer systems, storm water facilities, schools, parks and recreational facilities, police and fire protection facilities. Capital expenditures from park and recreation elements, if separate, should be included in the CFP Element. The CFP Element must be consistent with CWPPs, and [RCW 36.70A.070\(3\)](#), and include:

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
a. Policies or procedures to ensure capital budget decisions are in conformity with the comprehensive plan. RCW 36.70A.120			
b. An inventory of existing capital facilities owned by public entities. RCW 36.70A.070(3)(a) and WAC 365-196-415(1)(a)			
c. A forecast of needed capital facilities. RCW 36.70A.070(3)(b) and WAC 365-196-415(1)(b) Note: The forecast of future need should be based on projected population and adopted levels of service (LOS) over the planning period.			
d. Proposed locations and capacities of expanded or new capital facilities. RCW 36.70A.070(3)(c) and WAC 365-196-415 (1)(c) and (3)(c) ²			
e. A six-year plan (at least) that will finance such capital facilities within projected funding capacities and identify sources of public money to finance planned capital facilities. RCW 36.70A.070(3)(d) , RCW 36.70A.120 , WAC 365-196-415(1)(d)			

² Infrastructure investments should consider equity and plan for any potential displacement impacts.

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
f. A policy or procedure to reassess the Land Use Element if probable funding falls short of meeting existing needs. RCW 36.70A.070(3)(e) WAC 365-196-415(2)(d) Note: park and recreation facilities shall be included in the capital facilities plan element			
g. If impact fees are collected: identification of public facilities on which money is to be spent. RCW 82.02.050(5) and WAC 365-196-850(3)			

Utilities Element

Consistent with relevant CWPPs and RCW 36.70A.070(4). Utilities include, but are not limited to: sanitary sewer systems, water lines, fire suppression, electrical lines, telecommunication lines, and natural gas lines.

The general location, proposed location and capacity of all existing and proposed utilities. RCW 36.70A.070(4) and WAC 365-196-420			
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Transportation Element

Consistent with relevant CWPPs and RCW 36.70A.070(6)

a. An inventory of air, water, and ground transportation facilities and services, including transit alignments, state-owned transportation facilities, and general aviation airports. RCW 36.70A.070(6)(a)(iii)(A) and WAC 365-196-430(2)(c) .			
b. Adopted levels of service (LOS) standards for all arterials, transit routes and highways. RCW 36.70A.070(6)(a)(iii)(B) and (C) , WAC 365-196-430			
c. Identification of specific actions to bring locally-owned transportation facilities and services to established LOS. RCW 36.70A.070(6)(a)(iii)(D) , WAC 365-196-430			

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
d. A forecast of traffic for at least 10 years including land use assumptions used in estimating travel. RCW 36.70A.070(6)(a)(i) , RCW 36.70A.070(6)(a)(iii)(E) , WAC 365-196-430(2)(f)			
e. A projection of state and local system needs to meet current and future demand. RCW 36.70A.070(6)(a)(iii)(F) and WAC 365-196-430(1)(c)(vi)			
f. A pedestrian and bicycle component to include collaborative efforts to identify and designate planned improvements for pedestrian and bicycle facilities and corridors that address and encourage enhanced community access and promote healthy lifestyles. RCW 36.70A.070(6)(a)(vii) , WAC 365-196-430(2)(j)			
g. A description of any existing and planned transportation demand management (TDM) strategies, such as HOV lanes or subsidy programs, parking policies, etc. RCW 36.70A.070(6)(a)(vi) and WAC 365-196-430(2)(i)(i)			
h. An analysis of future funding capability to judge needs against probable funding resources. RCW 36.70A.070(6)(a)(iv)(A) , WAC 365.196-430(2)(k)(iv)			
i. A multi-year financing plan based on needs identified in the comprehensive plan, the appropriate parts of which serve as the basis for the 6-year street, road or transit program. RCW 36.70A.070(6)(a)(iv)(B) and RCW 35.77.010 , WAC 365-196-430(2)(k)(ii)			

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
j. If probable funding falls short of meeting identified needs: a discussion of how additional funds will be raised, or how land use assumptions will be reassessed to ensure that LOS standards will be met. RCW 36.70A.070(6)(a)(iv)(C) , WAC 365-196-430(2)(l)(iii)			
k. A description of intergovernmental coordination efforts, including an assessment of the impacts of the transportation plan and land use assumptions on the transportation systems of adjacent jurisdictions and how it is consistent with the regional transportation plan. RCW 36.70A.070(6)(a)(v) ; WAC 365-196-430(1)(e) and 430(2)(a)(iii)			

Shoreline

For shorelines of the state, the goals and policies of the shoreline management act as set forth in [RCW 90.58.020](#) are added as one of the goals of the Growth Management Act (GMA) as set forth in [RCW 36.70A.480](#). The goals and policies of a shoreline master program for a county or city approved under [RCW 90.58](#) shall be considered an element of the county or city's comprehensive plan.

a. The policies, goals, and provisions of RCW 90.58 and applicable guidelines shall be the sole basis for determining compliance of a shoreline master program with this chapter except as the shoreline master program is required to comply with the internal consistency provisions of RCW 36.70A.070 , 36.70A.040(4) , 35.63.125 , 35A.63.105 , 36.70A.480			
b. Shoreline master programs shall provide a level of protection to critical areas located within shorelines of the state that assures no net loss of shoreline ecological functions necessary to sustain shoreline natural resources as defined by department of ecology guidelines adopted pursuant to RCW 90.58.060 .			

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
c. Shorelines of the state shall not be considered critical areas under this chapter except to the extent that specific areas located within shorelines of the state qualify for critical area designation based on the definition of critical areas provided by RCW 36.70A.030(5) and have been designated as such by a local government pursuant to RCW 36.70A.060(2) .			
d. If a local jurisdiction's master program does not include land necessary for buffers for critical areas that occur within shorelines of the state, as authorized by RCW 90.58.030(2)(f) , then the local jurisdiction shall continue to regulate those critical areas and their required buffers pursuant to RCW 36.70A.060(2) .			

Provisions for siting essential public facilities (EPFs)

Consistent with CWPPs and [RCW 36.70A.200](#), amended 2021. This section can be included in the Capital Facilities Element, Land Use Element or in its own element. Sometimes the identification and siting process for EPFs is part of the CWPPs.

a. A process or criteria for identifying and siting essential public facilities (EPFs). RCW 36.70A.200 and WAC 365-196-550(1) Notes: RCW 36.70A.200, amended 2021 regarding reentry and rehabilitation facilities. EPFs are defined in RCW 36.70A.200 . Regional transit authority facilities are included in the list of essential public facilities.			
b. Policies or procedures that ensure the comprehensive plan does not preclude the siting of EPFs. RCW 36.70A.200(5) Note: If the EPF siting process is in the CWPPs, this policy may be contained in the comprehensive plan as well. WAC 365-196-550(3)			

Tribal Participation in Planning new in 2022 (see [HB 1717](#))

A federally recognized Indian tribe may voluntarily choose to participate in the local and regional planning processes.

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
a. Mutually agreeable memorandum of agreement between local governments and tribes in regard to collaboration and participation in the planning process unless otherwise agreed at the end of a mediation period. RCW 36.70A.040(8)(a) new in 2022, RCW 36.70A.190 new in 2022			
b. <i>Port elements</i> , if adopted, are developed collaboratively between the city, the applicable port and the applicable tribe(s), which shall comply with RCW 36.70A.040(8) . RCW 36.70A.085 amended in 2022			
c. <i>Urban Growth Areas</i> : counties and cities coordinate planning efforts for any areas planned for urban growth with applicable tribe(s). RCW 36.70A.110(1) amended 2022, RCW 36.70A.040(8)			

Future required elements: pending state funding

As of 2022, these elements have not received state funding to aid local jurisdictions in implementation. Therefore, these elements are not required to be added to comprehensive plans at this time. Commerce encourages jurisdictions to begin planning for these elements, pending the future mandate.

	In Current Plan? Yes/No If yes, cite section	Notes
Economic Development Although included in RCW 36.70A.070 “mandatory elements” an economic development element is not currently required because funding was not provided to assist in developing local elements when this element was added to the GMA. However, provisions for economic growth, vitality, and a high quality of life are important, and supporting strategies should be integrated with the land use, housing, utilities, and transportation elements. RCW 36.70A.070(7) amended 2017		
Parks and Recreation Although included in RCW 36.70A.070 “mandatory elements” a parks and recreation element is not required because the state did not provide funding to assist in developing local elements when this provision was added to the GMA. However, park, recreation, and open space planning are GMA goals, and it is important to plan for and fund these facilities. RCW 36.70A.070(8)		

Optional Elements

Pursuant to [RCW 36.70A.080](#), a comprehensive plan may include additional elements, items, or studies dealing with other subjects relating to the physical development within its jurisdiction, including, but not limited to:

	In Current Plan? Yes/No If yes, cite section	Notes
Climate Change Mitigation & Resilience As of 2022, this optional element has not yet received state funding to aid local jurisdictions in implementation. Please visit Commerce's Climate Program page for resources and assistance if interested in developing climate mitigation and resilience plans for your jurisdiction.		
Sub-Area Plans		
Other		

Consistency is required by the GMA

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
a. All plan elements must be consistent with relevant county-wide planning policies (CWPPs) and, where applicable, multi-county planning policies (MPPs), and the GMA. RCW 36.70A.100 and 210 , WAC 365-196-305 ; 400(2)(c) ; 510 and 520			
b. All plan elements must be consistent with each other. RCW 36.70A.070 (preamble) and WAC 365-197-040			
c. The plan must be coordinated with the plans of adjacent jurisdictions. RCW 36.70A.100 and WAC 365-196-520			

Public Participation

a. Plan ensures public participation in the comprehensive planning process. RCW 36.70A.020(11) , .035 , and .140 , WAC 365-196-600(3) provide possible public participation choices.			
b. If the process for making amendments is included in the comprehensive plan: <ul style="list-style-type: none"> • The plan provides that amendments are to be considered no more often than once a year, not including the exceptions described in RCW 36.70A.130(2), WAC365-196-640 • The plan sets out a procedure for adopting emergency amendments and defines emergency. RCW 36.70A.130(2)(b) and RCW 36.70A.390, WAC 365-196-650(4) 			

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
<p>c. Plan or program for monitoring how well comprehensive plan policies, development regulations, and other implementation techniques are achieving the comp plan's goals and the goals of the GMA. WAC 365-196-660 discusses a potential review of growth management implementation on a systematic basis.</p> <p>New 2021-2022 legislation HB 1241 provides that those jurisdictions with a periodic update due in 2024 have until December 31, 2024 to submit. The legislation also changed the update cycle to every ten years after the 2024-2027 cycle. Jurisdictions that meet the new criteria described in RCW 36.70A.130(9) will be required to submit an implementation progress report five years after the review and revision of their comprehensive plan.</p>			
<p>d. Considerations for preserving property rights. Local governments must evaluate proposed regulatory or administrative actions to assure that such actions do not result in an unconstitutional taking of private property. RCW 36.70A.370. For further guidance see the 2018 Advisory Memo on the Unconstitutional Taking of Private Property</p>			

Section II: Development Regulations

Must be consistent with and implement the comprehensive plan. [RCW 36.70A.040](#), [WAC 365-196-800](#) and [810](#)

Critical Areas

Regulations protecting critical areas are required by [RCW 36.70A.060\(2\)](#), [RCW 36.70A.172\(1\)](#), [WAC 365-190-080](#) and [WAC 365-195-900 through 925](#).

Please visit Commerce's [Critical Areas webpage](#) for resources and to complete the [Critical Areas Checklist](#). Critical areas regulations must be reviewed and updated, as necessary, to incorporate legislative changes and best available science. Jurisdictions using periodic update grant funds to update critical areas regulations must submit the critical areas checklist as a first deliverable, in addition to this periodic update checklist.

Zoning Code

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
a. Zoning designations are consistent and implement land use designations that accommodate future housing needs by income bracket as allocated through the countywide planning process (RCW 36.70A.070(2)(c) - Amended in 2021 with HB 1220)			
b. Permanent supportive housing or transitional housing must be allowed where residences and hotels are allowed. RCW 36.70A.390 New in 2021, (HB 1220 sections 3-5) "permanent supportive housing" is defined in RCW 36.70A.030 ; "transitional housing" is defined in RCW 84.36.043(2)(c)			
c. Indoor emergency shelters and indoor emergency housing shall be allowed in any zones in which hotels are allowed, except in cities that have adopted an ordinance authorizing indoor emergency shelters and indoor emergency housing in a majority of zones within one-mile of transit. Indoor emergency housing must be allowed in areas with hotels. RCW 35A.21.430 amended in 2021, RCW 35.21.683 , amended in 2021, (HB 1220 sections 3-5) "emergency housing" is defined in RCW 84.36.043(2)(b)			

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
d. The number of unrelated persons that occupy a household or dwelling unit except as provided in state law, for short term rentals, or occupant load per square foot shall not be regulated or limited by cities. (HB 5235) , RCW 35.21.682 new in 2021, RCW 35A.21.314 new in 2022, RCW 36.01.227 new in 2021			
e. Limitations on the amount of parking local governments can require for low-income, senior, disabled and market-rate housing units located near high-quality transit service. RCW 36.70A.620 amended in 2020 and RCW 36.70A.600 amended in 2019			
f. Family day care providers are allowed in all residential dwellings located in areas zoned for residential or commercial RCW 36.70A.450 . Review RCW 43.216.010 for definition of family day care provider and WAC 365-196-865 for more information.			
g. Manufactured housing is regulated the same as site built housing. RCW 35.21.684 amended in 2019, RCW 35.63.160 , RCW 35A.21.312 amended in 2019 and RCW 36.01.225 amended in 2019. A local government may require that manufactured homes: (1) are new, (2) are set on a permanent foundation, and (3) comply with local design standards applicable to other homes in the neighborhood, but may not discriminate against consumer choice in housing. See: National Manufactured Housing Construction and Safety Standards Act of 1974			

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
<p>h. Accessory dwelling units: cities (and counties) must adopt or amend by ordinance, and incorporate into their development regulations, zoning regulations and other official controls the requirements of RCW 36.70A.698 amended in 2021; Review RCW 36.70A.696 amended in 2021 through 699 and RCW 43.63A.215(3)</p> <p>Watch for new guidance from Commerce on the Planning for Housing webpage.</p>			
<p>i. Residential structures occupied by persons with handicaps, and group care for children that meets the definition of “familial status” are regulated the same as a similar residential structure occupied by a family or other unrelated individuals. No city or county planning under the GMA may enact or maintain ordinances, development regulations, or administrative practices which treat a residential structure occupied by persons with handicaps differently than a similar residential structure occupied by a family or other unrelated individuals.</p> <p>RCW 36.70A.410, RCW 70.128.140 and 150, RCW 49.60.222-225 and WAC 365-196-860</p>			

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
<p>j. Affordable housing programs enacted or expanded under RCW 36.70A.540 amended in 2022 comply with the requirements of this section. Examples of such programs may include: density bonuses within urban growth areas, height and bulk bonuses, fee waivers or exemptions, parking reductions, expedited permitting conditioned on provision of low-income housing units, or mixed-use projects. WAC 365-196-300</p> <p>See also RCW 36.70A.545 and WAC 365-196-410(2)(e)(i)</p> <p>“affordable housing” is defined in RCW 84.14.010</p> <p>Review RCW 36.70A.620 amended in 2020 for minimum residential parking requirements</p>			
<p>k. Limitations on regulating: outdoor encampments, safe parking efforts, indoor overnight shelters and temporary small houses on property owned or controlled by a religious organization. RCW 36.01.290 amended in 2020</p>			
<p>l. Regulations discourage incompatible uses around general aviation airports. RCW 36.70.547 and WAC 365-196-455. Incompatible uses include: high population intensity uses such as schools, community centers, tall structures, and hazardous wildlife attractants such as solid waste disposal sites, wastewater or stormwater treatment facilities, or stockyards. For more guidance, see WSDOT’s Aviation Land Use Compatibility Program.</p>			

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
m. If a U.S. Department of Defense (DoD) military base employing 100 or more personnel is within or adjacent to the jurisdiction, zoning should discourage the siting of incompatible uses adjacent to military base. RCW 36.70A.530(3) and WAC 365-196-475 . Visit Military One Source to locate any bases in your area and help make determination of applicability. If applicable, inform the commander of the base regarding amendments to the comprehensive plan and development regulations on lands adjacent to the base.			
n. Electric vehicle infrastructure (jurisdiction specified: adjacent to Interstates 5, 90, 405 or state route 520 and other criteria) must be allowed as a use in all areas except those zoned for residential, resource use or critical areas. RCW 36.70A.695			
Shoreline Master Program Consistent with RCW 90.58 Shoreline Management Act of 1971			
a. Zoning designations are consistent with Shoreline Master Program (SMP) environmental designations. RCW 36.70A.480			
b. If updated to meet RCW 36.70A.480 (2010), SMP regulations provide protection to critical areas in shorelines that is at least equal to the protection provided to critical areas by the critical areas ordinance. RCW 36.70A.480(4) and RCW 90.58.090(4) See Ecology's shoreline planners' toolbox for the SMP Checklist and other resources and Ecology's Shoreline Master Programs Handbook webpage			

Natural Resource Lands

Defined in [RCW 36.70A.030\(3\), \(12\) and \(17\)](#) and consistent with [RCW 36.70A.060](#) and [RCW 36.70A.170](#)

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
a. Zoning is consistent with natural resource lands designations in the comprehensive plan and conserves natural resource lands. RCW 36.70A.060(3) , WAC 365-196-815 and WAC 365-190-020(6) . Consider innovative zoning techniques to conserve agricultural lands of long-term significance RCW 36.70A.177(2) . See also WAC 365-196-815(3) for examples of innovative zoning techniques.			
b. Regulations to assure that use of lands adjacent to natural resource lands does not interfere with natural resource production. RCW 36.70A.060(1)(a) and WAC 365-190-040 Regulations require notice on all development permits and plats within 500 feet of designated natural resource lands that the property is within or near a designated natural resource land on which a variety of commercial activities may occur that are regulations to implement comprehensive plan			
c. For designated agricultural land, regulations encourage nonagricultural uses to be limited to lands with poor soils or otherwise not suitable for agricultural purposes. Accessory uses should be located, designed and operated to support the continuation of agricultural uses. RCW 36.70A.177(3)(b)			
d. Designate mineral lands and associated regulations as required by RCW 36.70A.131 and WAC 365-190-040(5) . For more information review the WA State Dept. of Natural Resources (DNR)'s Geology Division site			

Siting Essential Public Facilities

Regulations for siting essential public facilities should be consistent with [RCW 36.70A.200](#) and consider [WAC 365-196-550](#). Essential public facilities include those facilities that are typically difficult to site, such as airports, state education facilities, state or regional transportation facilities, state and local correctional facilities, solid waste handling facilities, and in-patient facilities including substance abuse facilities, mental health facilities, group homes, and secure community transition facilities. Regulations may be specific to a local jurisdiction, but may be part of county-wide planning policies (CWPPs).

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
Regulations or CWPPs include a process for siting EPFs and ensure EPFs are not precluded. RCW 36.70A.200(2), (3), (5) . WAC 365-196-550(6) lists process for siting EPFs. WAC 365-196-550(3) details preclusions. EPFs should be located outside of known hazardous areas. Visit Commerce's Behavioral Health Facilities Program page for information on establishing or expanding new capacity for behavioral health EPFs.			

Subdivision Code

a. Subdivision regulations are consistent with and implement comprehensive plan policies. RCW 36.70A.030(5) and 36.70A.040(4) .			
b. Written findings to approve subdivisions establish adequacy of public facilities. RCW 58.17.110 amended in 2018 <ul style="list-style-type: none"> Streets or roads, sidewalks, alleys, other public ways, transit stops, and other features that assure safe walking conditions for students. Potable water supplies, sanitary wastes, and drainage ways. RCW 36.70A.590 amended 2018 Open spaces, parks and recreation, and playgrounds Schools and school grounds Other items related to the public health, safety and general welfare WAC 365-196-820(1) .			

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
<p>c. Preliminary subdivision approvals under RCW 58.17.140 and RCW 58.17.170 are valid for a period of five or seven years (previously five years).</p> <p>Note: preliminary plat approval is valid for: seven years if the date of preliminary plat approval is on or before December 31, 2014; five years if the preliminary plat approval is issued on or after January 1, 2015; and ten years if the project is located within city limits, not subject to the shoreline management act, and the preliminary plat is approved on or before December 31, 2007.</p>			
Stormwater			
<p>a. Regulations protect water quality and implement actions to mitigate or cleanse drainage, flooding, and storm water run-off that pollute waters of the state, including Puget Sound or waters entering Puget Sound. RCW 36.70A.070(1) Regulations may include: adoption of a stormwater manual consistent with Ecology's latest manual for Eastern or Western Washington, adoption of a clearing and grading ordinance –See Commerce's 2005 Technical Guidance Document for Clearing and Grading in Western Washington.</p> <p>Adoption of a low impact development ordinance. See Puget Sound Partnership's 2012 Low Impact Development guidance and Ecology's 2013 Eastern Washington Low Impact Development guidance.</p> <p>Additional Resources: Federal Grants to Protect Puget Sound Watersheds, Building Cities in the Rain, Ecology Stormwater Manuals, Puget Sound Partnership Action Agenda</p>			

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
b. Provisions for corrective action for failing septic systems that pollute waters of the state. RCW 36.70A.070(1) . See also: DOH Wastewater Management, Ecology On-Site Sewage System Projects & Funding			

Organic Materials Management Facilities

New in 2022, HB 1799 added a section to the GMA aimed at reducing the volumes of organic materials collected in conjunction with other solid waste and delivered to landfills, supporting productive uses of organic material waste and reduction of methane gas (a greenhouse gas).

<p>New section RCW 36.70A.142; new 2021-2022 legislation HB 1799: Development regulations newly developed, updated, or amended <i>after January 1, 2025</i> allow for the siting of organic materials (OM) management facilities as identified in local solid waste management plans (SWMP) to meet OM reduction and diversion goals. Siting to meet criteria described in RCW 70A.205.040(3).</p> <p>See also RCW 36.70.330. For applicability, see RCW 70A.205.540</p>			
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Impact Fees

May impose impact fees on development activity as part of the financing for public facilities, provided that the financing for system improvements to serve new development must provide for a balance between impact fees and other sources of public funds; cannot rely solely on impact fees.

a. If adopted, impact fees are applied consistent with RCW 82.02.050 amended in 2016, .060 amended in 2021, .070 , .080 , .090 amended in 2018 and .100 . WAC 365-196-850 provides guidance on how impact fees should be implemented and spent.			
---	--	--	--

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
b. Jurisdictions collecting impact fees must adopt and maintain a system for the deferred collection of impact fees for single-family detached and attached residential construction, consistent with RCW 82.02.050(3) amended in 2016			
c. If adopted, limitations on impact fees for early learning facilities RCW 82.02.060 amended in 2021			
d. If adopted, exemption of impact fees for low-income and emergency housing development RCW 82.02.060 amended in 2021. See also definition change in RCW 82.02.090(1)(b) amended in 2018			

Concurrency and Transportation Demand Management (TDM)

Ensures consistency in land use approval and the development of adequate public facilities as plans are implemented, maximizes the efficiency of existing transportation systems, limits the impacts of traffic and reduces pollution.

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
<p>a. The transportation concurrency requirement includes specific language that prohibits development when level of service standards for transportation facilities cannot be met. RCW 36.70A.070(6)(b), WAC 365-196-840.</p> <p>Note: Concurrency is required for transportation, but may also be applied to park facilities, etc.</p>			
<p>b. Measures exist to bring into compliance locally owned transportation facilities or services that are below the levels of service established in the comprehensive plan. RCW 36.70A.070(6)(a)(iii)(B) and (D). Levels of service can be established for automobiles, pedestrians and bicycles. See WAC 365-196-840(3) on establishing an appropriate level of service.</p>			
<p>c. Highways of statewide significance (HSS) are exempt from the concurrency ordinance. RCW 36.70A.070(6)(a)(iii)(C)</p>			
<p>d. Traffic demand management (TDM) requirements are consistent with the comprehensive plan. RCW 36.70A.070(6)(a)(vi). Examples may include requiring new development to be oriented towards transit streets, pedestrian-oriented site and building design, and requiring bicycle and pedestrian connections to street and trail networks. WAC 365-196-840(4) recommends adopting methodologies that analyze the transportation system from a comprehensive, multimodal perspective.</p>			

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
e. If required by RCW 82.70 , a commute trip reduction (CTR) ordinance to achieve reductions in the proportion of single-occupant vehicle commute trips has been adopted. The ordinance should be consistent with comprehensive plan policies for CTR and Department of Transportation rules.			
Tribal Participation in Planning new in 2022 (see HB 1717) A federally recognized Indian tribe may voluntarily choose to participate in the county or regional planning process.			
a. Mutually agreeable memorandum of agreement between local governments and tribes in regard to collaboration and participation in the planning process unless otherwise agreed at the end of a mediation period RCW 36.70A.040(8)(a) new in 2022			
b. Policies consistent with countywide planning policies that address the protection of tribal cultural resources in collaboration with federally recognized Indian tribes that are invited, provided that a tribe, or more than one tribe, chooses to participate in the process. RCW 36.70A.210(3)(i) new in 2022			
Regulations to Implement Optional Elements			
a. New fully contained communities are consistent with comprehensive plan policies, RCW 36.70A.350 and WAC 365-196-345			
b. If applicable, master planned resorts are consistent with comprehensive plan policies, RCW 36.70A.360 , RCW 36.70A.362 and WAC 365-196-460			

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
c. If applicable, major industrial developments and master planned locations outside of UGAs are consistent with comprehensive plan policies, RCW 36.70A.365 , RCW 36.70A.367 and WAC 365-196-465			
d. Regulations include procedures to identify, preserve, and/or monitor historical or archaeological resources. RCW 36.70A.020(13) , WAC 365-196-450			
e. Other development regulations needed to implement comprehensive plan policies such as energy, sustainability or design are adopted. WAC 365-196-445			
f. Design guidelines for new development are clear and easy to understand; administration procedures are clear and defensible.			

Project Review Procedures

<p>Project review processes integrate permit and environmental review. RCW 36.70A.470, RCW 36.70B and RCW 43.21C.</p> <p>Also: WAC 365-196-845, WAC 197-11(SEPA Rules), WAC 365-197 (Project Consistency Rule, Commerce, 2001) and Ecology SEPA Handbook.</p> <p>Integrated permit and environmental review procedures for:</p> <ul style="list-style-type: none"> • Notice of application • Notice of complete application • One open-record public hearing • Combining public hearings & decisions for multiple permits • Notice of decision • One closed-record appeal 			
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Plan & Regulation Amendments

If procedures governing comprehensive plan amendments are part of the code, then assure the following are true:

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
a. Regulations limit amendments to the comprehensive plan to once a year (with statutory exceptions). RCW 36.70A.130(2) and WAC 365-196-640(3) .			
b. Regulations define <i>emergency</i> for an emergency plan amendment. RCW 36.70A.130(2)(b) and WAC 365-196-640(4) .			
c. Regulations include a docketing process for requesting and considering plan amendments. RCW 36.70A.130(2) , RCW 36.70A.470 , and WAC 365-196-640(6) .			
d. A process has been established for early and continuous public notification and participation in the planning process. RCW 36.70A.020(11) , RCW 36.70A.035 and RCW 36.70A.140 . See WAC 365-196-600 regarding public participation and WAC 365-196-610(2) listing recommendations for meeting requirements.			
e. A process exists to assure that proposed regulatory or administrative actions do not result in an unconstitutional taking of private property RCW 36.70A.370 . See the 2018 Advisory Memo on the Unconstitutional Taking of Private Property			
f. Provisions ensure adequate enforcement of regulations, such as zoning and critical area ordinances (civil or criminal penalties). See implementation strategy in WAC 365-196-650(1) .			



Washington State
Department of
Commerce

We strengthen communities

Guidance for Updating Your Housing Element - Public Review Draft

To meet evolving community needs

LOCAL GOVERNMENT DIVISION
GROWTH MANAGEMENT
SERVICES

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For people with disabilities, this report is available on request in other formats. To submit a request, please call 360.725.4000 (TTY 360.586.0772).

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Chapter 1. Introduction

Housing is the most basic of human needs. When people can secure stable and affordable housing near locations of jobs and opportunity, they are able to focus on achieving other life goals, such as education, career advancement, health and wellness or raising a family. Without stable and affordable housing, they face significant and sometimes insurmountable challenges to achieving these goals.

Local governments do not provide housing, but they set the conditions in place to encourage the market to develop housing affordable to all members of the community. Housing planning and policymaking are integral functions of cities and counties, and essential for supporting inclusive, diverse and economically vibrant communities. Reviewing, evaluating and updating housing plans, policies, and associated development regulations can help jurisdictions meet evolving community needs for housing variety and affordability, as well as achieve other planning goals for land use, economic development, transportation and the environment.

Each county and city in Washington state is to review and revise, if needed, their comprehensive plan and development regulations every eight years, according to a schedule in RCW 36.70A.130. At these times, a jurisdiction should review the housing element and assess the performance of implementing development regulations and programs, in order to prepare a thorough update. Local governments may also amend their comprehensive plans each year in order to address pressing needs and/or requests from the community.

The guidance is a resource to support cities and counties in Washington state to review and update the housing element of their comprehensive plan. It clarifies required and recommended steps for communities planning under the Growth Management Act (GMA). It provides examples of best practices from a wide variety of community types and it references other resources that provide more detailed guidance on topics such as housing needs assessments and housing action plans.

Purpose of a Housing Element

Washington cities and counties all have their own unique housing context and challenges. However, our state's natural beauty, temperate climate and healthy economy continues to attract new residents. This has increased competition for existing housing, raising costs and increasing the demand for more housing and a wider variety of housing types. Local governments must grapple with the complications of accommodating this projected growth in

Reader's Guide

This guidebook is a resource to support cities and counties with developing or updating the housing element of their comprehensive plan, with a focus on the legal and policy framework in Washington state. It is organized in eight parts:

- 1. Introduction:** Overview of the guidebook and purpose of preparing a housing element.
- 2. Housing Needs Assessment:** Required and recommended topics, relationship to the comprehensive plan and available resources to support preparation.
- 3. Countywide Planning Policies (CPPs):** Requirements and best practices for developing CPPs related to housing, as well as guidance for maintaining consistency between local plans and CPPs.
- 4. Housing Element Review:** Guidance for evaluating your current housing element, including alignment with needs, implementation of policies and achievement of growth targets.
- 5. Updating Goals and Policies:** Best practices for evaluating and updating existing goals and policies and crafting clear and effective new ones.
- 6. Identifying Strategies to Implement Your Policies:** How to select strategies to implement your policies.
- 7. Adopting your Housing Element:** Recommendations for managing a successful adoption process, including public and stakeholder engagement.
- 8. Implementing and Monitoring:** Guidance for developing an effective implementation plan and monitoring program.

a manner that takes into account the needs of all economic segments of the community while managing impacts to neighborhood character and quality of life.

The housing element provides the opportunity to identify and prioritize local housing problems and trends, and to craft solutions appropriate to the local context. Such solutions are likely to involve a mix of strategies that can work together to shape opportunities for development and encourage the kinds of housing production that are in greatest need.

Recognizing that most communities already have a comprehensive plan and housing element they need to update, the comprehensive planning process provides an opportunity to evaluate existing housing policies and analyze what's changed within the housing context. This exercise may demonstrate a need to strengthen the policies by adding more specific guidance, and/or it may demonstrate a need to shift policies in a new direction.

The main objectives in preparing or updating a housing element are to:

- Understand the county-wide housing market(s) and the local community's role in it.
- Update the local housing needs assessment to understand how the community's housing stock does or does not meet the needs of the population.
- Assess the amount of land available to meet projected housing needs.
- Consider strategies to address housing needs by estimating their potential impact on the housing market.
- Adopt or update local housing goals, policies and implementation strategies that provide solutions to existing problems and guidance to future housing development,

Ultimately, there's substantial flexibility in how local communities craft their housing elements. Beyond integrating the components listed above, there's no prescribed format for the element. Each community should choose an approach that fits its unique context and needs, ensuring the housing element is consistent with the land use element and supported by the other elements of the plan.

Requirements for a Housing Element under GMA

Cities and counties fully planning under the GMA¹ must include a housing element in their comprehensive plans. [RCW 36.70A.070\(2\)](#) sets out the requirements for a housing element, which must include the following components:

- **Housing Needs Assessment:** An inventory and analysis of existing and projected housing needs that identifies the number of housing units necessary to manage projected growth.
- **Goals, Policies and Objectives:** A statement of goals, policies, objectives and mandatory provisions for the preservation, improvement and development of housing.
- **Residential Land Capacity Analysis:** Analysis to identify sufficient land to accommodate housing growth targets.
- **Provisions for all Economic Segments:** Adequate provisions to address existing and projected needs of households at all income levels.

Exhibit 1 lists both required and recommended topics for a housing element based on RCW 36.70A.070(2) and WAC 365-196-410.

¹ Requirements for who must plan under GMA are defined in RCW 36.70A.040. A list and map of counties that are fully and partially planning under GMA is available here: <https://deptofcommerce.app.box.com/s/z8ygn0ifeimybnlh4j6v8cl1wxkp1jfa>.

Exhibit 1. Required and Recommended Topics for a Housing Element

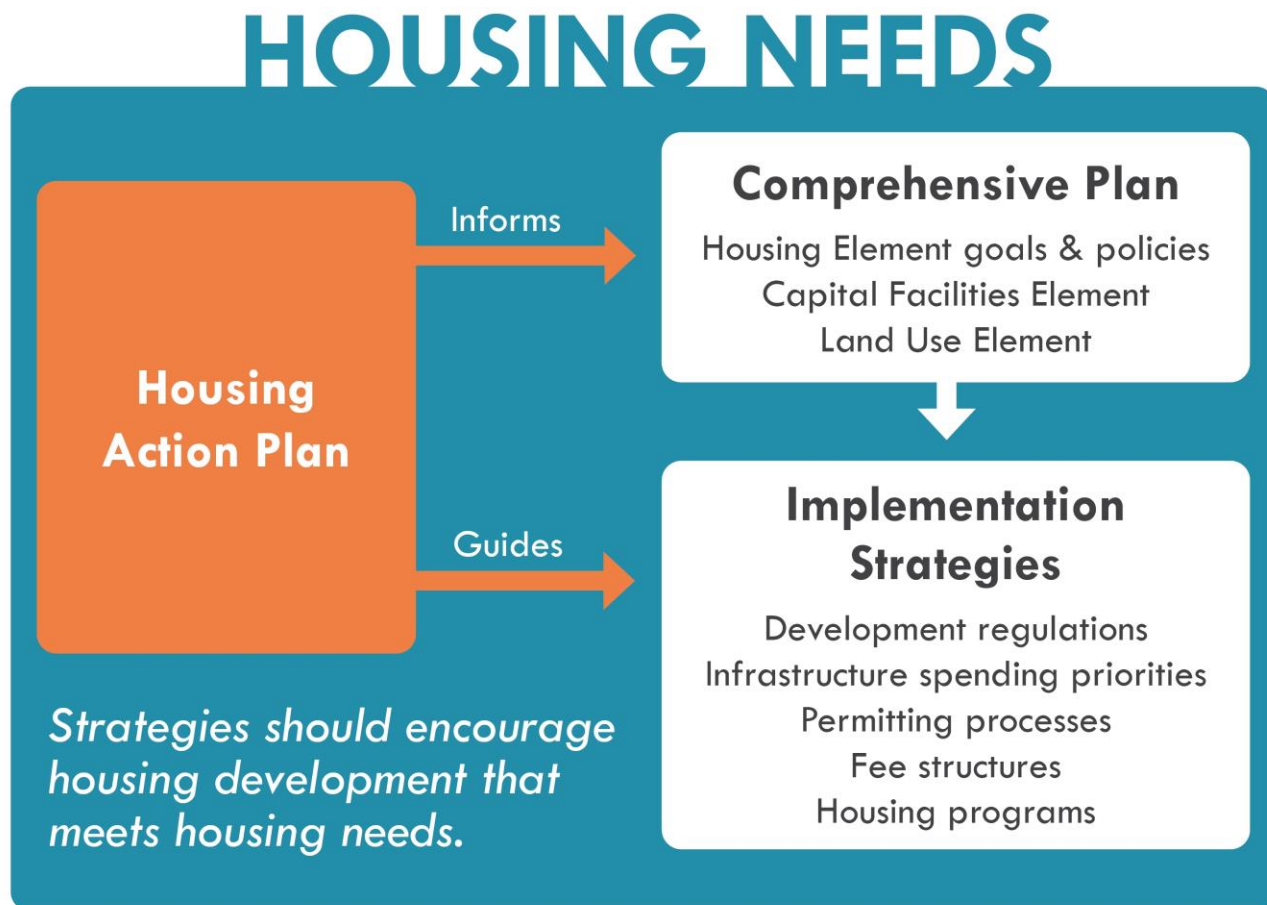
Topic	Guidance	Notes
Housing needs assessment		See Chapter 2. Housing Needs Assessment
<ul style="list-style-type: none"> Community profile (population and household characteristics) 	<ul style="list-style-type: none"> Required 	For details on required and recommended contents for a housing needs assessment, see the separate Commerce report Guidance for Developing a Housing Needs Assessment , p. 16.
<ul style="list-style-type: none"> Population trends 	<ul style="list-style-type: none"> Required 	
<ul style="list-style-type: none"> Housing inventory 	<ul style="list-style-type: none"> Required 	
<ul style="list-style-type: none"> Gap analysis by income level 	<ul style="list-style-type: none"> Required 	
<ul style="list-style-type: none"> Units needed to manage projected growth 	<ul style="list-style-type: none"> Required 	
<ul style="list-style-type: none"> Land capacity analysis 	<ul style="list-style-type: none"> Required 	
<ul style="list-style-type: none"> Housing market conditions 	<i>Recommended</i>	
<ul style="list-style-type: none"> Workforce profile and employment trends 	<i>Recommended</i>	
<ul style="list-style-type: none"> Special housing needs 	<i>Recommended</i>	
Outreach and engagement		See "Public Engagement" in Chapter 7 as well as Guidance for Developing a Housing Action Plan (Commerce, 2020) for more detailed recommendations.
<ul style="list-style-type: none"> Public engagement plan 	<ul style="list-style-type: none"> Required 	RCW 36.70A.130(2)
<ul style="list-style-type: none"> Broad public and stakeholder engagement 	<ul style="list-style-type: none"> Required 	
Housing element review		See Chapter 4. Housing Element Review
<ul style="list-style-type: none"> Evaluate progress to meet housing targets (including types and units) 	<i>Recommended</i>	
<ul style="list-style-type: none"> Evaluate achievement of housing element goals and policies 	<i>Recommended</i>	
<ul style="list-style-type: none"> Evaluate implementation of the schedule of programs and actions 	<i>Recommended</i>	
Goals, policies and objectives		See Chapter 5. Updating Goals and Policies
<ul style="list-style-type: none"> Goals, policies, objectives and mandatory provisions for the preservation, improvement and development of housing 	<ul style="list-style-type: none"> Required 	
<ul style="list-style-type: none"> Provisions for all economic segments 	<ul style="list-style-type: none"> Required 	
Implementation and monitoring		See Chapter 8. Implementing and Monitoring Your Housing Element
<ul style="list-style-type: none"> Schedule of programs and actions to implement housing policies 	<i>Recommended</i>	WAC 365-196-410 subsection (2)(f)
<ul style="list-style-type: none"> Monitoring program to track progress towards goals and objectives as well as outcomes of implemented policies 	<i>Recommended</i>	WAC 365-196-410 subsection (2)(f)

Source: [RCW 36.70A.070\(2\)](#); [WAC 365-196-410](#)

Relationship between Housing Element and Housing Action Plan

In 2019, many cities across Washington state were awarded grants from Washington State Department of Commerce to prepare a Housing Action Plan (HAP). The process of developing a HAP includes preparing a housing needs assessment and conducting an evaluation of existing policies, plans and regulations in relation to identified needs or gaps.² The HAP should also include strategies to address housing needs and an implementation plan. This work can be directly used to support future housing element updates. Other portions of the HAP can be used to guide action steps for the housing element.

Exhibit 2. Relationship between a Housing Action Plan and Comprehensive Plan



Source: Commerce, 2020; BERK, 2020

² See [Guidance for Developing a Housing Action Plan](https://www.commerce.wa.gov/serving-communities/growth-management/growth-management-topics/planning-for-housing/) (Commerce, 2020) at <https://www.commerce.wa.gov/serving-communities/growth-management/growth-management-topics/planning-for-housing/>.

Chapter 2. Housing Needs Assessment

This chapter reviews requirements for cities and counties planning under GMA to conduct a housing needs assessment (HNA) as part of their comprehensive plan update. It also provides guidance for evaluating progress towards your housing targets and conducting a land capacity analysis. For more detailed guidance on preparing an HNA, see the separate report from Commerce: [Guidance for Developing a Housing Needs Assessment](#).³

An HNA is a study to identify current and future housing needs to serve all economic segments of the community. To do this task, your HNA should answer the following kinds of questions:

- Who lives and works here and what are their demographic and socioeconomic characteristics?
- What types of housing currently exist in the community?
- Are there any groups of people who are not able to find housing that is safe, affordable and meets their household needs? If so, what are their housing needs?
- How many new units are needed to accommodate current needs as well as planned population growth over the 20-year planning horizon? How is this broken down by affordability level?
- What types of housing could accommodate these needs and price points?
- Is there enough buildable land capacity to accommodate this growth and housing diversity?

Answering these questions typically involves the quantitative analysis of data from the Census, county assessor, city permit records or other sources. However, important insights should also be gained through engagement with community members and service providers that can describe challenges that are not well reflected in available data. See the "Public Engagement" section of Chapter 7 of this guidance for a more detailed discussion of public and stakeholder engagement.

Requirements for an HNA

The housing needs assessment should include two of the four housing element topics required by the Growth Management Act⁴:

- 1) *An inventory and analysis of existing and projected housing needs that identifies the number of housing units necessary to manage projected growth;*
- 3) *Identification of sufficient land for housing including, but not limited to, government-assisted housing, housing for low-income families, manufactured housing, multifamily housing, group homes and foster care facilities.*

Jurisdictions should begin preparing their HNA in advance of (or as a first step to) the comprehensive plan update. The HNA should consider population and housing growth targets and how that will impact land use and capital facility investments.

The Washington Administrative Code (WAC) provides advisory guidance for completing a housing element.⁵ It recommends that jurisdictions complete an inventory and needs assessment, and identifies specific components for analysis. The inventory should include information about current housing including number of units, types of housing and affordability. It should also include information about housing for populations that

³ Find this report on the Commerce website at:

<https://www.commerce.wa.gov/serving-communities/growth-management/growth-management-topics/planning-for-housing/>

⁴ RCW 36.70A.070(2)

⁵ WAC 365-196-410

may have special needs such as the elderly, differently abled or people with low incomes. A needs assessment should also determine housing needed to accommodate the populations at the end of the planning period and ensure sufficient land capacity to meet these needs.

Exhibit 3 provides a detailed list of information that can be included in your HNA. It also notes which of these topics are required or recommended for cities and counties preparing an HNA as part of their GMA comprehensive plan update (see "GMA Housing Element"). To read a more detailed description about what each of these topics entails, see [Guidance for Developing a Housing Needs Assessment](#). These required and recommended topics are similar to those required for inclusion in a Housing Action Plan (HAP), described in RCW 36.70A.600(2). Those cities preparing a HAP can typically use the same HNA to support their subsequent housing element update.

Housing Targets

Chapter 3 describes how 20-year population growth targets are developed by the Washington State Office of Financial Management (OFM) for each county, and then allocated to cities, urban growth areas and rural areas as a countywide process. Based on countywide population growth targets, individual jurisdictions should ensure their portion of the housing growth targets can be accommodated within the existing or planned capacity of land and capital facilities.⁶

In addition to determining the total number of housing units needed to accommodate projected growth, jurisdictions also should review if there are any existing housing gaps that exist today and identify types of housing needed based on the income levels of current and expected future residents. This section provides guidance on how to determine if there are existing housing gaps, or underproduction, within your community and how to develop future housing targets broken down by different income segments based on population growth targets. It also explains how to track progress toward those targets. For more information on how to break down total housing unit targets by types of housing that are aligned with housing needs, see "[Targets by Housing Unit Types](#)" in Chapter 4.

⁶ See WAC 365-196-410 (2d)

Exhibit 3. Comparison of Various Housing Planning Requirements

Housing Needs Assessment	GMA Housing Element	HB-1923 Housing Action Plan	HUD Consolidated Plan
Community Profile			
Population Characteristics			
Count of population	•	•	•
Population by age group		•	•
Population diversity: Race, ethnicity, languages spoken, etc		o	•
Population forecasts	20-year	Planning period	5 -year
Household Characteristics			
Household count	•	•	•
Household sizes		•	•
Household types		o	
Household tenure (rental versus ownership)	•	•	•
Overcrowding estimates			•
Household income and cost burden	•	•	•
Extremely low-, low-, moderate-, and middle-income families	•	•	•
Displacement risk		•	
Special Housing Needs			
Groups with special housing needs	o	o	•
Individuals and families experiencing homelessness	o	o	•
Workforce Profile			
Local workforce characteristics		o	
Jobs to housing ratio	o	o	
Employment trends and projections	o	•	
Housing Supply			
General Housing Inventory			
Unit count by type (single or multifamily, manufactured)	•	•	•
Size (number of bedrooms)	•	•	•
Housing Market Conditions			
Housing development trends		o	
Sales prices	o	o	
Rental rates	o	o	
Vacancy rate		o	
Housing condition			
Housing production			o
Housing affordability	o	o	o
Special Housing Inventory			
Subsidized/public housing units	•	•	•
Group homes or care facilities	•	•	•
Housing for homeless individuals: shelters, transitional housing, etc	o	o	
Gap analysis			
Quantity of housing units available to various income brackets	•	•	•
Alignment of household size to housing unit sizes	o	o	•
Units needed for special demographic groups	o	o	•
Projection of future housing demand	•	•	
Land capacity analysis			
Land available to meet housing unit demand	•	•	
Land available to meet special housing needs	o	o	

Legend

- Requirement
- o Recommendation

Sources: WAC [365-196-410](#), RCW [36.70A.600](#), HUD Consolidated Plan [24 CFR Part 91](#)

Underproduction

In recent years, housing production decreased after the great recession of 2008. Fewer housing units combined with significant in-migration into Washington state has led to an imbalance in supply and demand of housing. This imbalance is evident in the abnormally low vacancy rates across many jurisdictions in the state which many speculate has led to escalated prices. This overall lack of supply has been called underproduction.⁷ To truly meet a community's housing needs, a community should examine the level of underproduction and factor that into their plans for future housing. While there are several methods to calculate underproduction,⁸ a simple approach most consistent with the methodology in this guidance and Commerce's Guidance for Developing a Housing Needs Assessment includes the following steps:

- 1) Go to data.census.gov and pull up Occupancy Status (TableID: B25002) for your jurisdiction. This table provides total units, occupied units, and vacant units.
- 2) Calculate the vacancy rate by dividing vacant units by total units (vacant units/total units). If the rate is less than 5%, there is a shortage of housing; move on to Step 3. If the vacancy rate is 5% or greater, there may not be a noticeable underproduction issue within your community.
- 3) Calculate the total units needed to bring the vacancy rate to 5% by dividing the occupied units by 0.95.
- 4) Calculate the baseline housing deficit by subtracting the total existing units from the total units calculated in Step 3 (total units needed – total existing units).

It is important to note that this baseline housing deficit or underproduction calculation, has the potential to oversimplify baseline housing deficits and needs. Additionally, caution should be used in areas with significant numbers of vacation homes or short-term rentals. In those areas, consider using the Vacancy Status (TableID: B25004) estimates from the Census' American Community Survey (ACS) to refine these calculations by subtracting units "for seasonal, recreational, or occasional use" from both the vacant units and the total units before Step 2 if you are assuming these are units that are not effectively available on the market for long-term housing needs.⁹ Even with this adjustment, jurisdictions facing this issue should be careful when interpreting the results and consider other indicators of baseline housing deficits that are more targeted at specific populations in need. [Leavenworth's Housing Needs Assessment](#) provides one example of how to examine the housing needs of specific populations while considering the city's high demand for vacation homes.

Targets for Total Housing Growth

[Exhibit 4](#) walks through an example method for calculating housing growth targets based on the City of Yakima's 2040 population target. Here the City of Yakima assumes that current average household size will remain constant over the entire planning horizon. However, some jurisdictions may wish to consider whether the average household size may be expected to change in future years due to the kinds of new housing that are anticipated to be built or demographic trends. In many communities, household sizes have been declining over time – particularly those in which much of the historic housing stock was single family homes but much of the newer development is multifamily.

⁷ Up for Growth, "[Housing Underproduction in Washington State](#)," 2020.

⁸ Other methods to calculate under production include the following: (1) Methodology in Up for Growth's "[Housing Underproduction in Washington State](#)," 2020. (2) Methodology in the [Palouse Regional Housing Assessment](#) (2019) on pages 96-99. (3) Methodology in [Redmond's Housing Needs Assessment](#) (2020) on pages 33-34, that is similar to the Up for Growth methodology.

⁹ Comparing property addresses to owners' addresses and reviewing utility records can provide additional information about vacant and second homes.

Exhibit 4. Example Method for Calculating a Housing Growth Target (City of Yakima)

Variable	Value	Notes
Estimated population in 2020	95,490	Source: OFM, 2020
Population target, 2040	110,387	Source: City of Yakima, 2017; Yakima County, 2017
Target population growth, 2020-2040	14,897	Target population minus 2020 population
Average household size	2.7	Source: American Community Survey Table S1101, 5-year estimates 2014-2018
Target household growth, 2020-2040	5,517	Planned population growth divided by assumed household size (assumes no growth in group quarter population)
Target housing unit growth, 2020-2040	5,808	Assumes 5% vacancy ¹⁰ (divide households by 0.95)
Average annual housing unit production needed to achieve target in 2040	290	Target housing unit growth divided by planning period (20 years)

Breaking Down the Housing Target to Income Segments

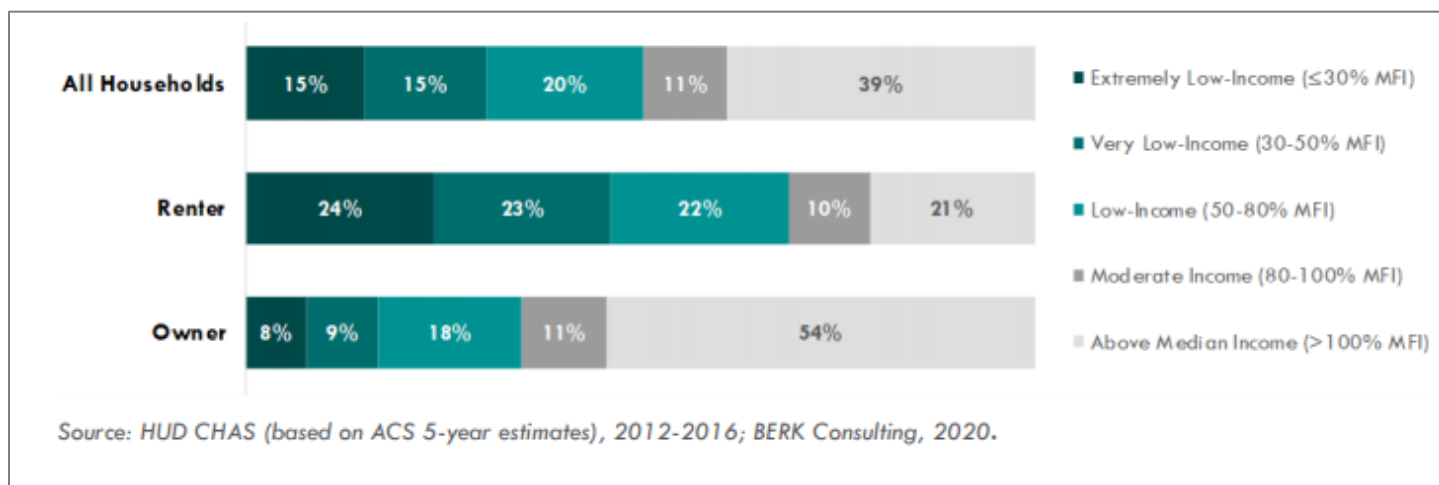
Unless there are specific countywide planning policies allocating how affordable housing is to be planned for or unique circumstances within the county, jurisdictions should assume that they should plan for housing to meet the needs of the various economic segments within the county. This is important because housing is regional in nature and people may not be able to afford to live in the community that they would otherwise choose. Commerce recommends projecting housing needs by income segments at both county and city levels and selecting targets that are appropriate for your unique circumstances that meet the goal for affordable housing.¹¹

A simple way to translate future housing needs into income brackets is to take the projected housing needs and break them down by the income segments within the county. Continuing the example, we use Department of Housing and Urban Development's Comprehensive Housing Affordability Strategy (CHAS) data to understand the approximate distribution of income segments in Yakima County. [Exhibit 5](#) and [Exhibit 6](#) show both City of Yakima and Yakima County's households by income segment. These graphics show there are proportionately more lower-income people within this particular city, which you might expect given subsidized housing within urban areas. Using the countywide breakdown of housing needs by income level, the City of Yakima would need to provide the number of units shown in [Exhibit 7](#).

¹⁰ A five percent vacancy rate across all housing types (ownership and rental included) is generally considered enough to provide for housing choices and options for residents seeking to move. Vacancy rates much higher than this indicate an oversupply of housing which can depress housing values. A lower vacancy rate results in increased competition for housing and can drive up housing prices.

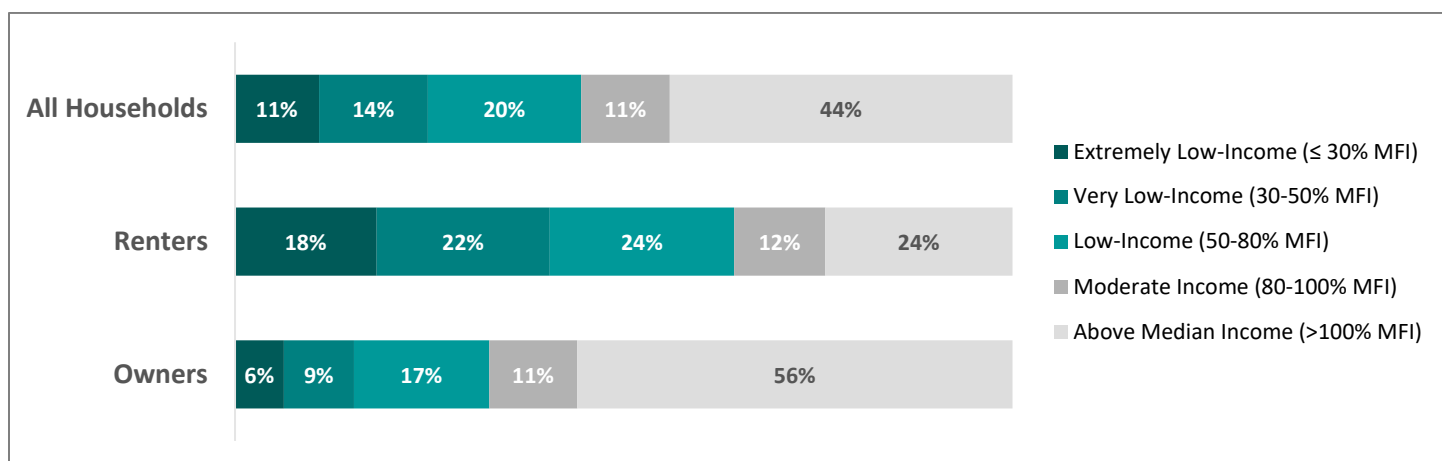
¹¹ For example, if you're calculating housing targets for Federal Way, using King County's income breakdown for future growth may not be appropriate, given that the county's incomes are so much higher than local incomes, and will continue to be so in the future.

Exhibit 5. Percentage of Households by Income Level in City of Yakima, 2012-2016



Source: [City of Yakima DRAFT Housing Needs Assessment](#), April 22, 2020

Exhibit 6. Percentage of Households by Income Level in Yakima County, 2013-2017



Source: HUD CHAS (based on ACS 5-year estimates), 2013-2017; Department of Commerce, 2021

Exhibit 7. Growth Related Housing Need by Income Segment

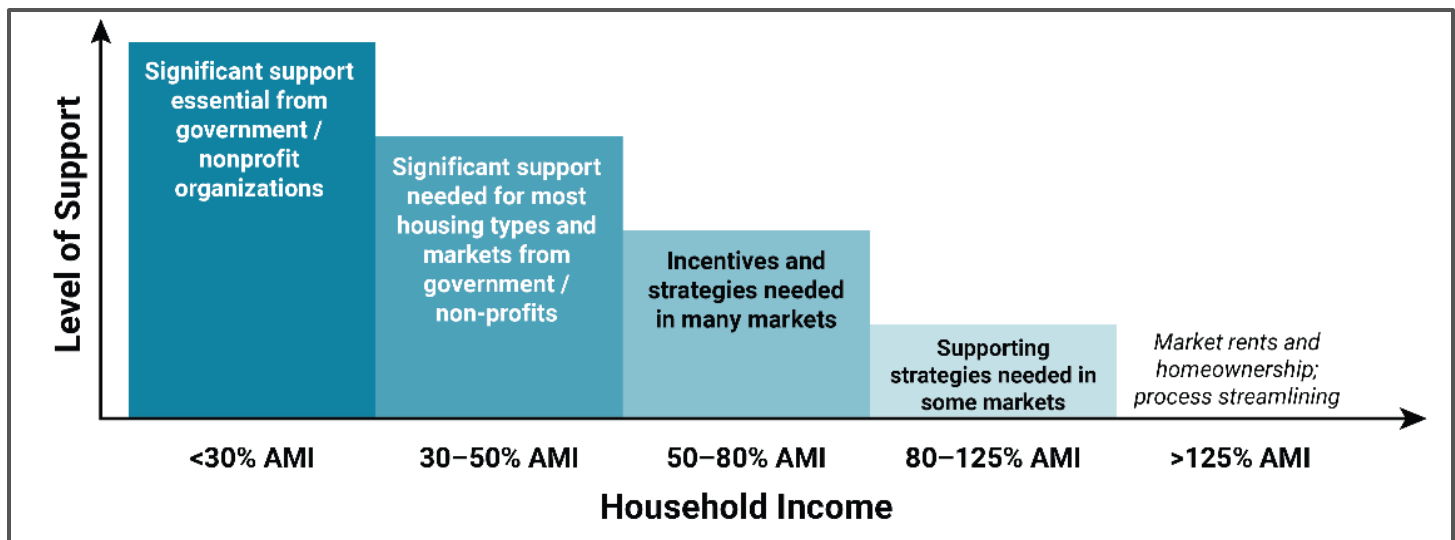
Household Income Distribution (MFI = median family income)	County Percentage	Total Future Units Needed
Extremely Low-Income (\leq 30% MFI)	10.8%	625
Very Low-Income (30-50% MFI)	14.0%	811
Low-Income (50-80% MFI)	19.7%	1,147
Moderate Income (80-100% MFI)	11.4%	664
Above Median Income ($>$ 100% MFI)	44.1%	2,562
TOTAL	100.0%	5,808

Source: HUD CHAS, 2013-2017

Exhibit 7 shows that the majority of future housing will be needed at the $>$ 100% area median income (AMI) bracket (2,562 units or 44%), and 2,583 housing units (or 44%) will be needed at the low-income, very low-income, and extremely low-income segments. Special measures will be needed to encourage and enable production of new housing or rehabilitation of existing housing to meet the needs of these groups. Exhibit 8 below notes that subsidies, incentives and partnerships are necessary to achieve housing for lower income segments (100% AMI and below). In addition to new production, "filtering" may help to meet the needs of lower income segments in some markets. Filtering is the idea that as new market-rate housing is built, higher-income people move into it, leaving behind older housing stock for lower-income people.

In order to plan for the lower income segments, we need to make assumptions about the types of housing each household is likely to occupy. It can be assumed that the extremely low- and very low-income segments will require multifamily housing, manufactured housing, and/or subsidized housing (25% of housing needs). Low-income housing needs may be met with attached housing types (20%), and moderate and higher income segment will be able to afford single-family housing (55%). In addition to tailoring housing typologies and associated policies to meet the needs of lower income segments, support will be needed for developers of affordable housing. See [Chapter 6. Identifying Strategies to Implement Your Policies](#) for more on strategies to meet various housing needs.

Exhibit 8. Strategies Needed for Different Income Segments



Source: BERK, 2020

Evaluating Progress toward Housing Targets

After adopting housing targets, jurisdictions should evaluate their past progress towards their housing targets. The purpose is to determine whether the jurisdiction's rate of growth puts it on track to meet or exceed its planned target, or whether additional actions may be necessary to encourage certain types of housing production. This evaluation should also look at the production of various housing types to meet housing needs.

Data about historic housing production can be in city or county permit records or summarized in [annual housing unit estimates](#) from OFM.¹² When using permit data, make sure to subtract demolished units to calculate the net new housing units added during the period of analysis.

[Exhibit 9](#) provides an example summarizing net new units with City of Yakima permit data between 2015 and 2019. During this period, a total of 1,391 net new units were produced, or about 278 units per year. This is slightly short of the 290 units needed each year to reach the city's housing target (see [Exhibit 4](#) above). However, the last two years in this series show an uptick in housing production of attached and multifamily types, following adoption of the city's comprehensive plan in 2017 and subsequent implementing actions. Continued monitoring of this trend will help determine whether additional actions are necessary to encourage an increase in housing production or additional incentives are necessary to guide production towards attached units for people with lower incomes.

¹² See the "Housing units Excel" link on this page: <https://www.ofm.wa.gov/washington-data-research/population-demographics/population-estimates/april-1-official-population-estimates>, which includes permits, completions, and demolitions for various housing types.

Exhibit 9. Permitted Housing Units in City of Yakima, 2015 - 2019

Housing Type	2015	2016	2017	2018	2019	Total
Single Family	114	107	90	144	89	544
Duplex	26	40	32	70	96	264
Multifamily with 3 & 4 unit in structure	3	0	3	36	35	77
Multifamily with 5 + unit in structure	0	0	0	15	616	631
Mobile Home	15	10	18	15	16	74
Total New	158	157	143	280	852	1,590
Demolitions (all types)	40	29	27	48	55	199
Net New Units (all types)	118	128	116	232	797	1,391
Average Annual Net New Units (2015-2019)	278					

Source: City of Yakima; BERK 2020

If the City of Yakima had adopted targets by housing type, rather than a total housing production target, then this same kind of analysis could be used to determine whether there has been an over- or under-production of units within any of those types compared to the targets. See "[Targets by Housing Unit Types](#)" in Chapter 4 for additional guidance on creating targets by housing unit type based on housing needs.

Land Capacity Analysis

The GMA requires that housing elements identify "mandatory provisions for the preservation, improvement, and development of housing" and "sufficient land for housing including, but not limited to, government-assisted housing, housing for low-income families, manufactured housing, multifamily housing, group homes and foster care facilities."¹³ In other words, the HNA should evaluate whether the jurisdiction has sufficient land capacity available to allow for the types of new housing needed to meet identified housing needs.¹⁴

One way to fulfill this requirement is conducting a land capacity analysis (LCA). This is a study conducted by counties and cities to determine the amount of vacant, partially used and under-utilized lands, as well as the redevelopment potential of built properties, to accommodate new residential development. This process identifies the potential for land within a community's boundaries to accommodate anticipated housing growth, given its current zoning restrictions. Analysis is typically conducted with Geographic Information System (GIS) and should consider capacity by housing type, such as single family detached, single family attached (e.g.,

¹³ RCW 36.70A.070(2)

¹⁴ RCW 36.70A.115 says that fully planning counties and their cities must "provide sufficient capacity of land suitable for development within their jurisdictions to accommodate their allocated housing and employment growth." This guidance focuses on the housing portion of sufficient capacity within this statute.

duplexes, triplexes, and townhomes), and multifamily units. Counties and cities use an LCA to determine if existing urban growth areas (UGAs) can accommodate twenty years of urban growth. The LCA involves applying assumptions of future densities and deduction factors, such as critical areas, rights-of-way and a market factor since all land is not going to be available for sale within the planning period. It is important to check whether these assumptions are realistic based on past development trends.

To inform the housing element update, you should review the LCA and consider how likely it is that designated zones will produce housing of different densities, types and affordability levels. See [Chapter 4. Housing Element Review](#) regarding the review of future land use designations and targets by housing unit types for more information. A more detailed discussion of methodology is also available in the [Department of Commerce's UGA Guidebook](#) (2012)¹⁵, starting on page 84.

Requirements for Buildable Lands Counties

If you are in a “buildable lands” county, subject to RCW 36.70A.215, then your jurisdiction has extra responsibilities. These counties (which include Clark, King, Kitsap, Pierce, Snohomish, Thurston and Whatcom) and the cities and towns within their boundaries, must gather data on the density and type of development that is occurring to understand whether development is occurring as planned. Unlike the LCA, which looks forward at how your current capacity and new population targets will work as you update your plan, buildable lands looks back at how your current comprehensive plan is functioning and whether the jurisdiction met their assumed density goals. The buildable lands review must be completed prior to the periodic review and update of the comprehensive plan and development regulations required under RCW 36.70A.130. If actual development patterns are different than those planned for in the comprehensive plan, the jurisdiction must adopt “reasonable measures” that will address those inconsistencies during the next update period. Any observations on development patterns and achieved densities are useful for making assumptions about undeveloped land and can be used for completing an LCA.

Revisions to the buildable statute under Engrossed Second Substitute Senate Bill 5284 (2017) now requires a deeper analysis related to the availability of infrastructure and housing affordability. In response, Commerce developed two new guidance documents, [Buildable Lands Guidelines \(2018\)](#) and [Housing Memo: Issues Affecting Housing Availability and Affordability](#). The guidelines provide general guidance for developing a land capacity analysis. The Housing Memo provides information on housing economics and provides advice for addressing various trends in the housing market.

Technical Resources

[UGA Guidebook \(Department of Commerce, 2012\)](#) - Detailed guidance for land capacity analysis methodology can be found starting on **page 84**.

[Buildable Lands Guidelines \(Department of Commerce, 2018\)](#) - Guidance on methodology starts on **page 30**.

[Housing Memo: Issues Affecting Housing Availability and Affordability \(Department of Commerce, 2019\)](#) - Considerations for housing trends in your community.

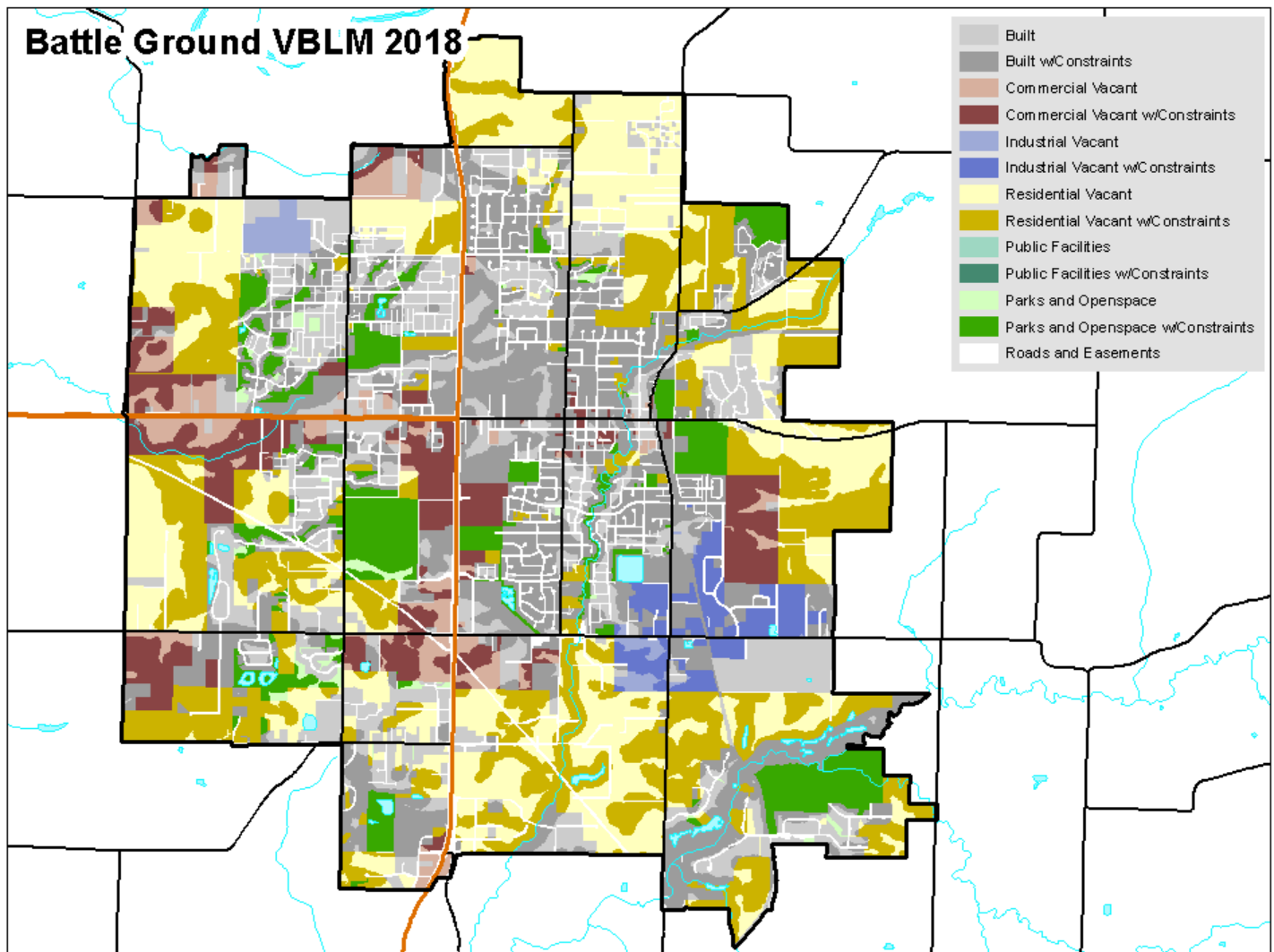
County-level buildable lands reporting should offer detailed methodology notes for reference by included communities.

¹⁵ <https://deptofcommerce.app.box.com/s/pnkar5j81ghxrqfdgr3ofa7pmw5v37da>

Calculating Available Land Capacity for Residential Development

Each community should review available land for development, and assess whether existing zoning provides capacity for a sufficient number of housing units to meet the 20-year population forecast. Associated housing targets may also include housing type and density assumptions which are needed to estimate the amount of land needed to meet housing targets. The capacity for future housing units should close the gap between the existing housing inventory and projected needs accounting for unit size, affordability and type, while taking into account regional housing needs. Exhibit 10 maps vacant and underutilized parcels for Battle Ground, a first step in estimating available land for development.

Exhibit 10. Clark County Parcel Capacity Designations for Battle Ground, 2018



Source: [Clark County Vacant Buildable Lands Model \(VBLM\) Maps and Data, 2018](#)

The LCA steps that focus on housing and affordability include the following:

1. Calculate total available land capacity by zone.
 - Identify parcels where residential or mixed-use development are permitted.

- Classify each parcel as either vacant, partially-utilized, under-utilized or developed. Jurisdictions must select a reasonable threshold for determining which parcels are partially-utilized, under-utilized or built-out.
 - Vacant parcels have no development.
 - Partially-utilized parcels have some development, but contain enough land to be subdivided without an upzone.¹⁶
 - Under-utilized parcels are built at a density level significantly below what is allowed under current zoning. Therefore, they could conceivably see redevelopment during the planning period.¹⁷
 - Developed parcels already built out are not expected to see additional infill or redevelopment activity.
- 2. Subtract land that will not see new residential development. This typically includes critical areas, utility easements and lands for public uses such as parks and schools, but may also include other local factors such as historic districts.
- 3. Identify any infrastructure and utility service gaps that could inhibit residential development during the planning period. Review whether service is planned within the capital facilities or transportation elements. If it is not planned, this points to infrastructure as a strategy to address affordability.¹⁸
- 4. Calculate total number of parcels and total acreage classified for accommodating growth by zone. Deduct a percentage of acreage for infrastructure such as roads and market factors.¹⁹ Consider whether deductions should be adjusted for vacant, partially-utilized and under-utilized lands.
- 5. Use current zoning and density assumptions to estimate the total capacity for housing on these parcels.
- 6. Subtract housing that already exists on these parcels from the total capacity to estimate the net new housing units that could be built.
- 7. Summarize total capacity for net-new housing in each zone. Then, based on allowed housing types in each zone, summarize potential capacity by housing type. Select categories for summarization that align with housing targets (or vice-versa). For example:
 - Single-family detached
 - Single-family attached
 - Multifamily

Comparing Capacity to Housing Targets

After completing an LCA, the next step is comparing capacity to projected housing needs. This analysis should help answer the following questions:

¹⁶ When setting these thresholds, consider local context, current market building trends and possibly a simple pro-forma analysis. Examples of thresholds for vacant, partially-used and under-utilized parcels have been set by Whatcom County and are included on page 95 and 96 of the [Urban Growth Area Handbook](#) (2012).

¹⁷ Some communities use a ratio of a parcel's improvement to land value to determine if a parcel is underutilized. In Kittitas County, if that value is below 0.5, they assume the parcel is underutilized and available for additional development. The county also assumes that any single-family home on a commercial, industrial or multi-family parcel is underutilized and can be removed for redevelopment. ([BERK, 2016](#))

¹⁸ See WAC 365-196-325 to 330 for details on infrastructure phasing. A dedicated funding source or sources must be a part of the six-year capital improvement plan. The 20-year capital facilities plan should support the desired growth patterns. See [Commerce's Capital Facilities Planning Guidebook](#) (2014) for more guidance on planning for and financing infrastructure and services needed to accommodate anticipated growth.

¹⁹ A market factor is often set in countywide planning policies, and are usually consistent across the county, but may be adjusted on type of land use. County-level buildable lands reports are a good resource for estimating these percentage deductions. For example, Snohomish County uses a market factor of roughly 17% based on information collected from surveys.

- Is there enough buildable land capacity to accommodate the total net new housing units projected to be needed for the planning period?
- Based on assumptions about the affordability of various types of housing, is there enough zoned capacity to accommodate future needs by housing type?

Other Questions the LCA Can Help Answer

- Is the new capacity in areas with the greatest opportunity? Map land capacity along with "opportunity" factors such as public transportation, job centers, schools and amenity clusters. Note areas in the community where zoned capacity is low, while opportunities are present. These may be focus areas for zoning and land use changes.
- Are there infrastructure gaps that could slow or hinder development? Use maps to show where public infrastructure is not available to support new growth. These areas should be a focus of public investment in infrastructure and should be addressed in the capital facilities element.
- What do the results tell you about the 'key findings' list from the gap analysis? Compare these findings with the needs in the HNA to identify where gaps exist, and what types of changes to the housing element, development regulations, development review processes or development incentives may be necessary to encourage the needed types of development.

What if There is Not Enough Capacity?

If your land capacity analysis shows there is insufficient capacity to meet new housing demand, or doesn't allow for the types of housing in greatest need, you should first consider increasing allowed residential densities and housing types within existing zones to increase capacity. This should be considered in combination with the housing needs and incomes of the community to ensure alignment of zoned capacity with housing needs and housing production targets by housing type.

Another option is to examine other zones, such as the potential for mixed-use or residential development in excess commercially-zoned land. Increasing densities in existing zones or encouraging redevelopment of excess commercial land can leverage your existing infrastructure investments. You also could consider reassessing your growth targets with your county planning partners, or expanding the UGA boundary in areas suitable for development. Expanding UGA boundaries should include consideration for the cost of providing infrastructure in new areas. For more information, refer to Commerce's [Urban Growth Area Guidebook](#).

- If an examination of affordability shows there are not enough ownership units at the low end of the spectrum, then increasing density through land use and zoning changes to allow smaller and more attached units may be an important strategy. When adding attached units as an allowed use, it may be useful to reconsider the use of unit-based densities (e.g., seven units per acre), and instead consider minimum lot size (e.g., 6,000 square feet) so that a given parcel is able to add units through attached housing types and not be limited by density restrictions. Infrastructure must be considered with these changes. See Commerce's [Guidance for Developing a Housing Action Plan \(2020\)](#) for a more detailed discussion of these and other strategies.
- If the gap analysis shows there are not enough rental apartments, additional land may need to be zoned at multifamily densities. Local strategies may require incentives such as bonus densities for the development of more rental units or, if eligible, incentives such as multifamily tax exemption.

Land Available to Meet Special Housing Needs

Another useful analysis is a review of properly zoned land to allow for the development of housing for special needs populations. The housing element requires local governments to identify “sufficient land for housing, including, but not limited to, government-assisted housing, housing for low-income families, manufactured housing, multifamily housing and group homes and foster care facilities” ([RCW 36.70A.070\(2\)](#)). The gap analysis between the community profile and housing inventory is an opportunity to review where there are sufficient facilities. The land capacity analysis provides the opportunity to determine whether there is enough land zoned to allow construction of senior homes, group homes or other types of needed housing identified in the needs analysis. You should also consider if available land is located in areas with sufficient amenities, such as transit and other services.

Next Steps: How the HNA fits into your Comprehensive Plan

As noted above, an HNA should be prepared in advance of the comprehensive plan update and consider population and housing growth targets. The HNA should inform housing element goals and policies, as discussed in [Chapter 5. Updating Goals and Policies](#). Typically, the HNA is integrated with the comprehensive plan as an appendix, separate from the housing element.

Chapter 3. Countywide Planning Policies

The Growth Management Act (GMA) includes a requirement that fully planning counties and their cities develop countywide planning policies (CPPs) to promote coordination and consistency for items of regional importance within the county (see [Exhibit 11](#) below). The framework CPPs²⁰ must include policies for:

- Designating urban growth areas (UGAs) per RCW 36.70A.110;
- Promoting contiguous and orderly development and providing urban services to such development;
- Siting public capital facilities of a countywide or statewide nature, including transportation facilities of statewide significance as defined in RCW 47.06.140;
- Countywide transportation facilities and strategies;
- Considering the need for affordable housing, such as housing for all economic segments of the population and parameters for its distribution;
- Joint county and city planning within urban growth areas;
- Countywide economic development and employment, which must include consideration of the future development of commercial and industrial facilities; and
- Analysis of the fiscal impact.

Many of these CPP topics directly or indirectly inform a coordinated county-city approach to housing including: allocating population growth among cities, unincorporated urban growth areas and rural areas; providing necessary infrastructure for housing (water, sewer, roads, etc.) and services to support residents (fire, school, parks, transit, etc.); fair share of affordable housing (subsidized, permanent supportive housing, shelters) and their siting within the county; joint planning for housing in unincorporated UGAs; and the support of economic development with workforce housing.

This chapter provides an overview of the role of CPPs in preparing and updating housing elements, and in guiding collective strategies to achieve affordable housing. It is organized as follows:

- Coordinated housing planning under the GMA
- Updating countywide planning policies
- Example countywide planning policies for housing
- Regional housing studies and strategies

Coordinated Housing Planning Under the GMA

The GMA includes specific requirements for how cities and counties should plan for housing, including especially housing affordable to lower-income households. The requirements apply in the 28 “fully planning” counties that must plan under the GMA (see [Exhibit 11](#)). Implementation of the GMA is guided by 14 overlapping goals including a housing goal (see sidebar).

GMA Housing Goal

The GMA housing goal is to “encourage the availability of affordable housing to all economic segments of the population of this state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock.” ([RCW 36.70A.020](#))

Countywide Planning Policies must include policies that consider the need for affordable housing, such as housing for all economic segments of the population and parameters for its distribution. ([RCW 36.70A.210 \(3\)\(e\)](#))

²⁰ RCW 36.70A.210

As housing is of a regional nature, countywide planning policies are an important tool to coordinate local approaches. Countywide planning policies should establish goals and policies that are consistent with the GMA housing goal, and provide a framework to address local and regional needs. The CPP policy topics must consider the need for affordable housing, for all economic segments and parameters for its distribution (see sidebar on previous page). Some counties include housing targets within CPPs. Local goals and policies must be consistent with countywide planning policies.²¹

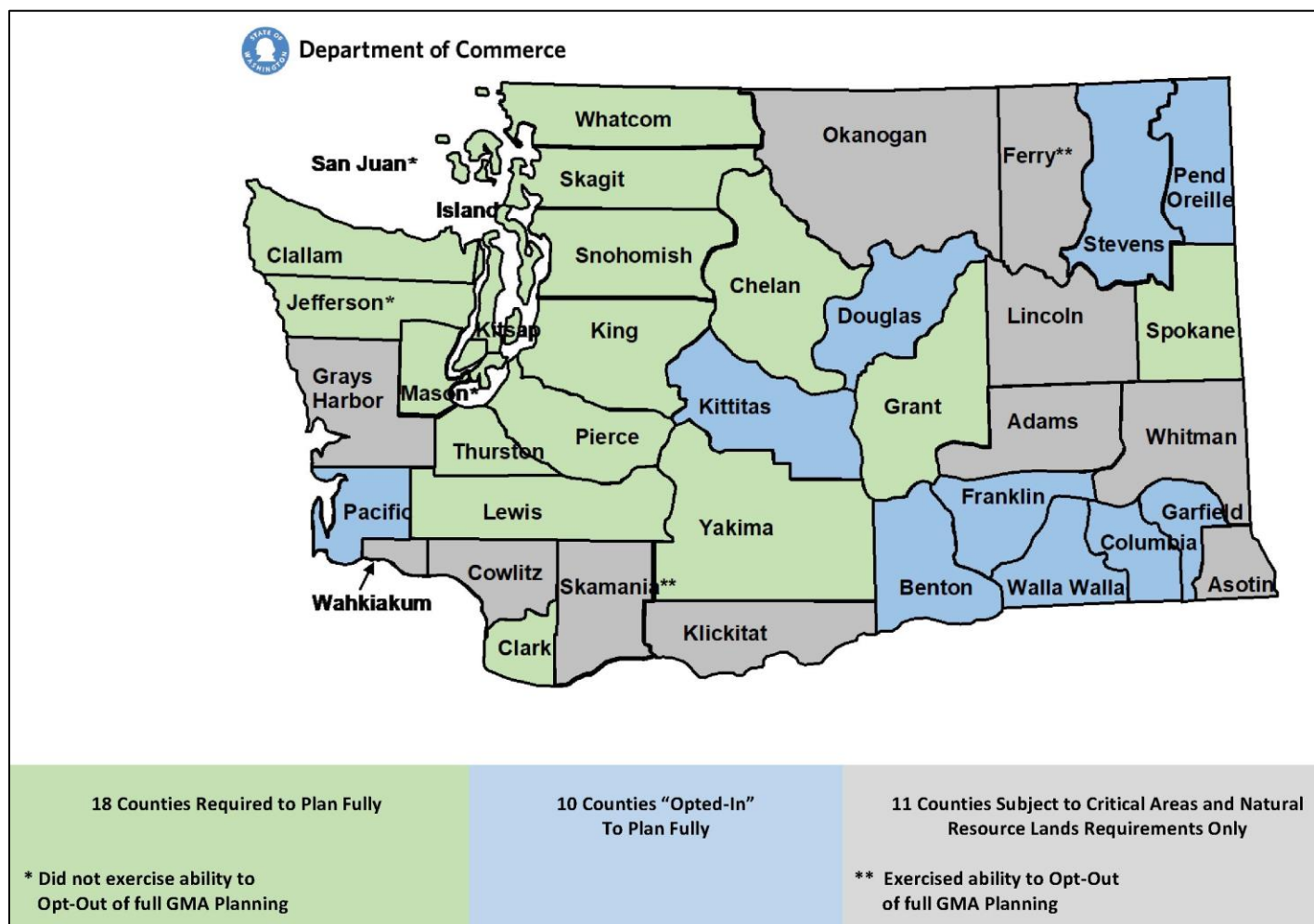
The policies of city and county comprehensive plans in Kitsap, King, Pierce and Snohomish counties must also be consistent with the multicounty planning policies (MPPs) in [Vision 2050](#) approved by the General Assembly of the Puget Sound Regional Council (PSRC) in October 2020. VISION 2050 includes a housing vision and housing goal, which reflect the GMA housing goal (see sidebar). The vision and goal emphasize a range of housing choices and affordability across income levels. The related housing policies also address health and safety, equity, preventing displacement, supporting ownership and public cooperation to provide housing for the most vulnerable (see [Exhibit 12](#)). Vision 2050 includes several actions for local jurisdictions: to conduct a housing needs analysis, to consider affordable housing incentives such as inclusionary and incentive zoning regulations, to assess displacement risk, and to update housing regulations to remove barriers to housing development.

Vision 2050 Housing Goal:

"The region preserves, improves and expands its housing stock to provide a range of affordable, accessible, healthy and safe housing choices to every resident. The region continues to promote fair and equal access to housing for all people."

²¹ See Paul Stickney and Richard Birgh v. City of Sammamish, Case No. 15-3-0017.

Exhibit 11: "Fully Planning" Counties in Washington State



Source: [Washington State Department of Commerce](https://www.wa.gov/department-of-commerce), 2017

Exhibit 12. PSRC's VISION 2050 Plan

"VISION 2050 calls for cities and counties to support the building of more diverse housing types, especially near transit, services, and jobs, to ensure all residents have the opportunity to live in thriving urban places. VISION 2050 also calls for more housing affordable to low- and very low-income households. It recognizes that providing long-term affordable housing for the region's most vulnerable residents requires public intervention through funding, collaboration, and jurisdictional action and cannot be met by market forces alone." ([Vision 2050](#), page 4)

- MPP-H-1: Plan for housing supply, forms and densities to meet the region's current and projected needs consistent with the Regional Growth Strategy and to make significant progress towards jobs/housing balance.
- MPP-H-2: Provide a range of housing types and choices to meet the housing needs of all income levels and demographic groups within the region.
- MPP-H-3: Achieve and sustain – through preservation, rehabilitation and new development – a sufficient supply of housing to meet the needs of low-income, moderate-income, middle-income and special needs individuals and households that is equitably and rationally distributed throughout the region.
- MPP-H-4: Address the need for housing affordable to low- and very low-income households, recognizing that these critical needs will require significant public intervention through funding, collaboration and jurisdictional action.
- MPP-H-5: Promote homeownership opportunities for low-income, moderate-income, and middle-income families and individuals while recognizing historic inequities in access to homeownership opportunities for communities of color.
- MPP-H-6: Develop and provide a range of housing choices for workers at all income levels throughout the region that is accessible to job centers and attainable to workers at anticipated wages.
- MPP-H-7: Expand the supply and range of housing at densities to maximize the benefits of transit investments, including affordable units, in growth centers and station areas throughout the region.
- MPP-H-8: Promote the development and preservation of long-term affordable housing options in walking distance to transit by implementing zoning, regulations and incentives.
- MPP-H-9: Expand housing capacity for moderate density housing to bridge the gap between single-family and more intensive multifamily development and provide opportunities for more affordable ownership and rental housing that allows more people to live in neighborhoods across the region.
- MPP-H-10: Encourage jurisdictions to review and streamline development standards and regulations to advance their public benefit, provide flexibility and minimize additional costs to housing.
- MPP-H-11: Encourage interjurisdictional cooperative efforts and public-private partnerships to advance the provision of affordable and special needs housing.
- MPP-H-12: Identify potential physical, economic and cultural displacement of low-income households and marginalized populations that may result from planning, public investments, private redevelopment and market pressure. Use a range of strategies to mitigate displacement impacts to the extent feasible.

Source: PSRC, "[Vision 2050](#)," 2021. All policies above are direct quotes.

Updating Countywide Planning Policies

Each fully planning county has adopted countywide planning policies in cooperation with their cities. Typically, there is an interjurisdictional body that provides recommendations to the county legislative body, and a process by which the policies are reviewed and amended. For example, in some counties the interagency body provides recommendations to the county government. Some counties also have a ratification process where a number of cities representing a majority share of population must affirm the amendments prior to final approval by the county legislative body.

The original deadline for fully planning counties and cities to prepare CPPs was very early after the GMA was passed, as one of the first steps in implementing growth management (see [RCW 36.70A.210](#)). Most counties adopted policies in the mid-1990s, and have updated their policies at least once or more ([Exhibit 13](#)).

There is currently no recommendation to update countywide planning policies, however it may be appropriate to review and revise CPPs periodically. This update could be after a new 20-year population forecast from the state Office of Financial Management (generally every five years, RCW 36.70A.040) or prior to a periodic review and update (RCW 36.70A.130), as appropriate.

COUNTY-CITY INTERJURISDICTIONAL COORDINATION

Each county and city that develops CPPs often works through existing cooperative bodies or specifies the formation of such a body in its CPPs or in other interlocal agreements. Two examples are described below.

Snohomish County Tomorrow (SCT): SCT began in March 1989 as a voluntary association of cities, towns, the county and the Tulalip Tribes. In July 1991, SCT agreed to use the SCT Goals as a basis for establishing the countywide planning policies required by RCW 36.70A.210. SCT has six committees that meet monthly. A full assembly of all the entities meets annually. Refinements and future amendments to CPPs involves one of the standing committees of SCT – usually, but not always, the Planning Advisory Committee (PAC) – to take the lead in formulating draft policy amendments to the Steering Committee. The Steering Committee then takes input and forwards its recommendation(s) to the county council. Finally, the council holds a public hearing and takes final action. A complete update of CPPs was accomplished in 2011 but there have been several amendments between 2011 and 2016.

Kittitas County Conference of Governments (KCCOG): This regional county-city body was organized under RCW 36.70.060. A primary duty at its founding in 1995 was to create the CPPs under GMA. The KCCOG also reviews population projections under GMA. A super majority vote is needed to decide issues of land use (60% of voting members representing 75% of population). The board meets monthly.

Exhibit 13. Countywide Planning Policies Dates Amended as of 2020

GMA Fully Planning Counties	CPPs Last Amended	GMA Fully Planning Counties	CPPs Last Amended	GMA Fully Planning Counties	CPPs Last Amended
Benton	2017	Jefferson	2015	San Juan	2008
Chelan	1992	King	2016	Skagit	2016
Clallam	2018	Kitsap	2015	Snohomish	2016
Clark	2016	Kittitas	2016	Spokane	2011
Columbia	2019	Lewis	2017	Stevens	1995
Douglas	2002	Mason	2016	Thurston	2015
Franklin	2019	Pacific	1997	Walla Walla	2005
Garfield	2008	Pend Oreille	2020	Whatcom	2005
Grant	2009	Pierce	2018	Yakima	2003
Island	2017				

Source: BERK review of County Countywide Planning Policies, October 2020

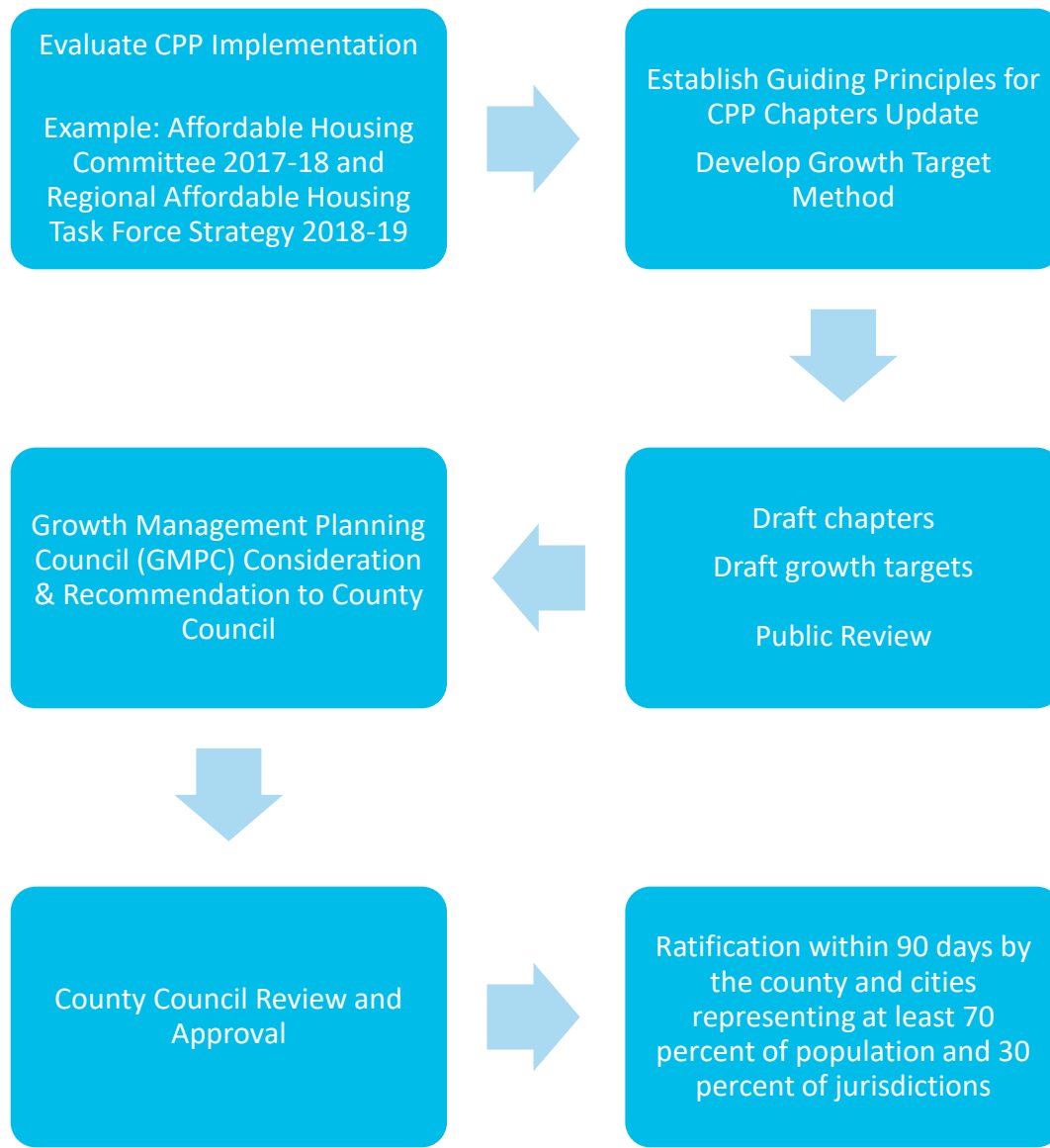
For example, King County is planning to prepare updates to CPPs to respond to OFM population allocations and prepare for a periodic review due by 2024. As part of the process, King County and its cities anticipate addressing the work of a 2017-2018 Affordable Housing Committee and to consider more local responsibility. Drawn from the 2018-19 Regional Affordable Housing Task Force Strategy²², one regional housing strategy likely to be considered in CPPs:

- "STRATEGY A: The Affordable Housing Committee will work with cities and the county to identify and prioritize new resources to build or preserve 44,000 units in the next five years and track progress toward the goal." The methods to address the strategy include more federal and state funding as well as "explore unused authority to raise revenue."

The King County process to update the CPPs regarding housing and other related growth management topics is illustrated in Exhibit 14.

²² Regional Affordable Housing Task Force. December 2018; Revised October 2019. Final Report and Recommendations for King County, WA. Available: <https://kingcounty.gov/initiatives/affordablehousing.aspx>.

Exhibit 14. King County CPP Amendment Process, 2021

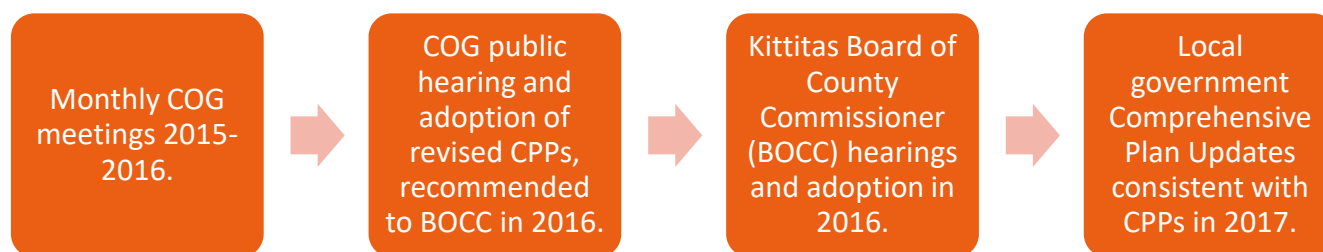


Source: <https://www.kingcounty.gov/depts/executive/performance-strategy-budget/regional-planning/Growth-Management/GMPC.aspx>

Other counties have similar procedures to amend their CPPs. Kittitas County's Conference of Governments (KCCOG), attended by elected officials from each city and the county, prepares policy amendments and approves them periodically. Since 1998, the CPPs had been lightly amended, but KCCOG conducted a thorough update of them in 2016 ([Exhibit 15](#)), ahead of the required periodic updates of county and city comprehensive plans, due in 2017.²³

²³ Per KCCOG bylaws, a super majority vote is needed to decide issues of land use (60% of voting members representing 75% of population).

Exhibit 15. Kittitas County Conference of Governments CPP Amendment Process, 2016



Example Countywide Planning Policies for Housing

One key function of CPPs or MPPs should be to provide a coordinated framework that ensures regional housing needs, including needs among households of all income levels, are collectively addressed in local housing plans. In other words, the goals and targets in local housing plans should, in aggregate, collectively address needs for housing by type in the county or multi-county area. This is because housing is a regional issue, and should be addressed at a regional level. Different counties and metropolitan regions have taken different approaches to creating this framework.

This section presents example policies in the following order, from most common to least common:

- Affordable Housing: "Policies that consider the need for affordable housing..." (RCW 36.70A.210(3)(e))
- Growth Target Allocation and Monitoring: Policies to implement urban growth areas (RCWs 36.70A.210(3)(a) and 36.70A.110) including specific policies regarding growth target allocations²⁴
- Fair Share Affordable Housing: "... housing for all economic segments of the population and parameters for its distribution." (RCW 36.70A.210(3)(e))

Affordable Housing Policies

CPPs guide each community's housing element, and vary in their detail, including listing housing types or regulatory techniques to address housing affordability. See examples in [Exhibit 16](#).

Exhibit 16. Examples of Countywide Policies Regarding Affordable Housing

County	Policy Text Quote
Spokane County	<p>4. Each jurisdiction's development policies, regulations and standards should provide for the opportunity to create affordable housing in its community, such policies may include regulatory tools, such as inclusionary zoning, performance/impact zoning, mixed-use development and incentives for increasing density to promote greater choice and affordable housing.</p> <p>6. In conjunction with other policy topics, coordinate housing, transportation, and economic development strategies to ensure that sufficient land and densities for affordable housing are provided in locations readily accessible to employment centers.</p>

²⁴ A few counties and cities ratify growth targets in their CPPs, though most counties adopt growth targets in other formats outside their CPPs following interjurisdictional coordination.

County	Policy Text Quote
Snohomish County	<p>HO-2. The county and cities shall make provisions in their comprehensive plans to accommodate existing and projected housing needs, including a specific assessment of housing needs by economic segment within the community as indicated in the housing report prescribed in CPP.</p> <p>HO-5. Those provisions should consider the following factors:</p> <ul style="list-style-type: none"> a. Avoiding further concentrations of low-income and special needs housing. b. Increasing opportunities and capacity for affordable housing in urban centers. c. Increasing opportunities and capacity for affordable housing close to employment, education, shopping, public services, and public transit. d. Increasing opportunities and capacity for affordable and special needs housing in areas where affordable housing is currently lacking. e. Supporting affordable housing opportunities in other Snohomish County jurisdictions, as described below in CPP HO-4.
Clark County	<p>2.1.7. Encourage flexible and cost efficient land use regulations that allow for the creation of alternative housing types which will meet the needs of an economically diverse population.</p>
Walla Walla County	<p>8.5. The housing and land use elements of the local comprehensive plans will include an assessment of land availability and general criteria for siting special purpose housing within the UGA to ensure that such housing can be accommodated. The assessment should include the extent to which demands from all segments will be met.</p> <p>8.6. Special purpose housing should include, but not be limited to, migrant farm worker housing and homeless shelters, as well as transitional and/or group homes for the developmentally or mentally disabled, recovering chemically dependent persons and the chronic mentally ill.</p>
Whatcom County	<p>5. The county and the cities shall review existing regulations and policies that exclude or discourage affordable housing in their communities and shall not adopt regulations and policies which do so. Mobile, modular, and manufactured homes on individual lots, mobile home parks, accessory units, inclusionary zoning, mixed use, and increased densities shall be reviewed as affordable housing alternatives.</p> <p>7. Low income housing shall not be concentrated in only a few communities or neighborhoods.</p> <p>8. The county and the cities shall consider reducing impact and/or mitigation fees for affordable housing provided in a proposed development.</p>

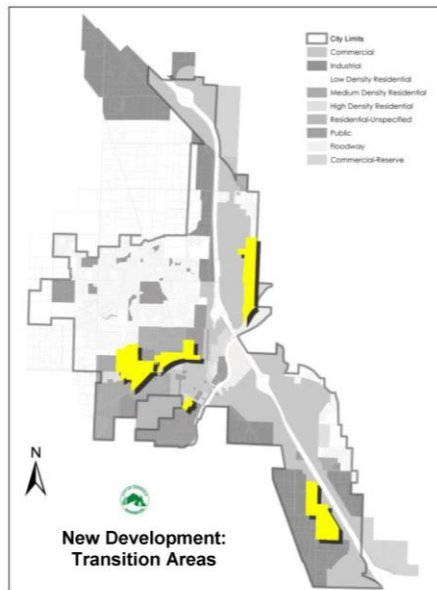
Source: BERK review of CPPs in Washington State, October 2020.

CPPs lead to more detailed locally-developed policies by individual cities. For example, consistent with Whatcom County CPPs, the City of Ferndale adopted a housing element that identified a range of housing types by neighborhood. See example in [Exhibit 17](#).

Exhibit 17. Ferndale Housing Element Excerpt

CHAPTER 3: HOUSING ELEMENT FERNDALE COMPREHENSIVE PLAN

NEW DEVELOPMENT – TRANSITION AREAS (PORTAL WAY, LABOUNTY, WEST MAIN):



Properties along Portal Way, LaBounty Drive and Main Street west of Washington Avenue have been designated for high density residential uses that may be used as a buffer or transition area between single family and mixed use or commercial development. In addition to duplexes, cottage housing and mixed-density Planned Unit Developments which are shared between single family and transition areas, the following housing forms will likely be the dominant type of development in these areas (though they may not be applicable to all zones):

Source: [City of Ferndale](#), 2016, p. 37

Ferndale also adopted policies that are consistent with CPPs about housing types and locations, such as:

- "Allow for alternative high density developments in multifamily zoning that allow for owner-occupied units, zero lot line development, duplex divisions and more."
- "Consider amending development regulations to consider the overall cost of residential occupancy, including additional costs associated with inefficient design, access to transportation (including transit), access to recreational opportunities, access to schools and access to employment opportunities."²⁵

Growth Target Allocation and Monitoring Policies

Most CPPs give guidance to how growth would be allocated across jurisdictions. Targets themselves are often adopted outside the CPPs. Counties that provide for growth targets in their CPPs also address the factors considered in allocation including housing (e.g., jobs/housing balance) and reference updating targets per Office of Financial Management (OFM) county forecasts. For selected examples, see [Exhibit 18](#). Cities then

²⁵ City of Ferndale, [City of Ferndale - Comprehensive Plan](#), 2016, p. 52

implement the targets in their land use and housing elements. Where CPPs provide population targets, local governments can adapt them into housing targets including by type as described in Chapters 2 and 4.

Exhibit 18. Growth Target Allocation and Monitoring

County	Growth Target Allocation and Monitoring, Policy Quote Text
Benton County	<p>Policy #2: The County shall allocate future projected populations through the use of the latest population projections published by the Washington State Office of Financial Management (OFM). Allocation of future populations shall be based on the following distribution: City of Kennewick 40% of total county population; City of Richland 28% of total county population; Benton County 19% of total county population; City of West Richland 8% of total county population; City of Prosser 3% of total county population and City of Benton City 2% of total county population. The County, in consultation with the Cities, will review the OFM population projection ranges (Low, Medium and High) and allocation percentages whenever OFM publishes new GMA population projections.</p>
King County	<p>DP-11: GMPC [Growth Management Planning Council] shall allocate residential and employment growth to each city and unincorporated urban area in the county. This allocation is predicated on:</p> <ul style="list-style-type: none"> • Accommodating the most recent 20-year population projection from the state Office of Financial Management and the most recent 20-year regional employment forecast from the Puget Sound Regional Council; • Planning for a pattern of growth that is consistent with the Regional Growth Strategy including focused growth within cities with countywide designated centers and within other larger cities, limited development in the Rural Area, and protection of designated Resource Lands; • Efficiently using existing zoned and future planned development capacity as well as the capacity of existing and planned infrastructure, including sewer and water systems; • Promoting a land use pattern that can be served by a connected network of public transportation services and facilities and pedestrian and bicycle infrastructure and amenities; • Improving the jobs/housing balance within the region and the county; • Promoting sufficient opportunities for housing and employment development throughout the Urban Growth Area; • Allocating growth to individual Potential Annexation Areas within the urban unincorporated area proportionate to its share of unincorporated capacity for housing and employment growth. <p>DP-12: GMPC shall:</p> <ul style="list-style-type: none"> • Update housing and employment targets periodically to provide jurisdictions with up-to-date growth allocations to be incorporated in state-mandated comprehensive plan updates; • Adopt housing and employment growth targets in the Countywide Planning Policies pursuant to the procedure described in policy G-1; and • Adjust targets administratively upon annexation of unincorporated Potential Annexation Areas by cities. Growth targets for the 2006-2031 planning period are shown in table DP-1. <i>[Table contains detailed growth allocations.]</i>

Fair Share Affordable Housing Policies

Each county has taken a different approach in developing policies that address affordable housing and parameters for its distribution. Most focus on guiding planning for affordable housing including housing supply, housing variety and type of housing in urban areas. Fewer identify a policy for determining each jurisdiction's fair share contribution to regional affordable housing needs. "Fair share" means that a county has determined the need for housing at various affordability levels and has allocated that across the jurisdictions with a coordinated approach (see [Exhibit 19](#)).

Exhibit 19. Example Fair Share Policies in Countywide Planning Policies

County	Fair Share Policies, Policy Quote Text	Fair Share Allocation Method
Jefferson County	6. Each UGA shall accommodate its fair share of housing affordable to low and moderate income households according to its percentage share of the county population and by promoting a balanced mix of diverse housing types.	There are two UGAs, the City of Port Townsend (36% of allocated population), and the unincorporated Port Hadlock-Irondale UGA (21%).
Thurston County	8.4. Establish and maintain a process to accomplish a fair share distribution of affordable housing among the jurisdictions.	Regional Housing Plan, Final December 2013, Appendix Table 2.1: Fair Share Distribution of Renter- and Owner-Occupied Housing in Thurston County. Allocated to each City and County. Based on Cost-burdened households, adjusted for transportation costs and accessibility to low-wage jobs.
Pierce County	3.3. It shall be the goal of each jurisdiction in Pierce County that a minimum of 25% of the growth population allocation is satisfied through affordable housing.	Each jurisdiction creates a Comprehensive Plan that identifies how 25% of the population allocation from 2008-2030 could be accommodated in affordable housing.
King County	<p>H-1. Address the countywide need for housing affordable to households with moderate, low and very-low incomes, including those with special needs. The countywide need for housing by percentage of Area Median Income (AMI) is:</p> <ul style="list-style-type: none"> ○ 50-80% of AMI (moderate) - 16% of total housing supply ○ 30-50% of AMI (low) - 12% of total housing supply ○ 30% and below AMI (very-low) - 12% of total housing supply <p>H-2. Address the need for housing affordable to households at less than 30% AMI (very low income), recognizing that this is where the greatest need exists, and addressing this need will require funding, policies and collaborative actions by all jurisdictions working individually and collectively.</p>	<p>The percent share by income is based on existing need. All must work individually and collectively to promote affordable housing for those earning less than 30% AMI.</p> <p>Each city and the County identifies how it contributes to meeting the countywide need for all income levels by preparing affordable housing need analysis.</p> <p>CPP Appendix 4 indicates: In order for each jurisdiction to address its share of the countywide housing need for very-low, low and moderate income housing, a four step approach has been identified:</p> <ol style="list-style-type: none"> 1. Conduct an inventory and analysis of housing needs and conditions; 2. Implement policies and strategies to address unmet needs; 3. Measure results; and 4. Respond to measurement with reassessment and adjustment of strategies.

County	Fair Share Policies, Policy Quote Text	Fair Share Allocation Method
Snohomish County	<p>HO-3. County and city comprehensive plans shall include policies for accommodating affordable housing goals throughout the County consistent with Vision 2040. The land use and housing elements should demonstrate they can accommodate needed housing availability and facilitate the regional fair share of affordable housing...</p> <p>HO-5. The cities and the county shall collaborate to report housing characteristics and needs ... this report shall, for the entire county and each jurisdiction:</p> <p>a. Describe the measures that jurisdictions have taken (individually or collectively) to implement or support CPPs on housing, especially ... housing affordability.</p> <p>b. Quantify and map existing characteristics ...</p> <p>c. Identify the number of housing units necessary to meet the various housing needs ..., by income ranges, and special needs populations. The number of units identified for each jurisdiction will be utilized for planning purposes and to acknowledge the responsibility of all jurisdictions to plan for affordable housing within the regional context.</p>	Requires each local government to evaluate their need and plan individually and collectively facilitate the regional fair share of housing.

Source: BERK review of CPPs in Washington State, October 2020

As an example of implementation, the City of Wenatchee has adopted the following policy regarding its fair share of housing affordable to low and moderate income households:

- Coordination, Policy 4: "Coordinate with regional agencies to stay abreast of and share in the responsibility for achieving a reasonable and equitable distribution of affordable housing to meet the needs of middle and lower income persons."²⁶

Example of Planning for All Housing Needs: California, Bay Area

Since 1969, California law requires cities, towns and counties to plan for housing needs, regardless of income. A regional housing needs allocation is prepared every eight years by the California Department of Housing and Community Development. Each region then allocates the need for housing at all income levels to individual local governments. A new allocation has been developed for 2022-2030.

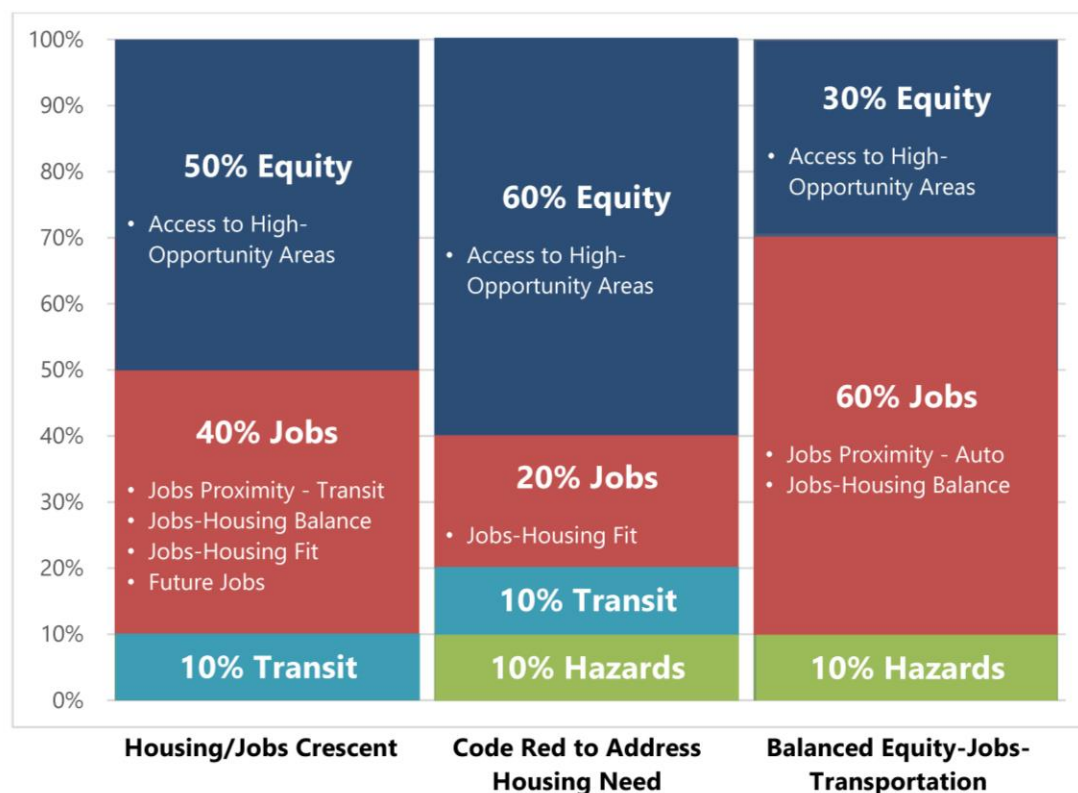
For example, the Association of Bay Area Governments (ABAG), a Metropolitan Planning Organization (MPO), is developing a methodology to allocate each jurisdiction's fair share of the regional allocation in a multi-county area of the San Francisco Bay Area (see [Exhibit 20](#)). In the spring of 2020, several methodologies were developed to consider how to allocate affordable housing, balancing different considerations. Factors include:

- Equity - access to high opportunity areas

²⁶ [Planning to Blossom 2037: Wenatchee Urban Area Comprehensive Plan](#)

- Jobs - jobs/housing balance, jobs-housing fit²⁷
- Transit - proximity
- Hazards - consideration of natural hazards

Exhibit 20. Association of Bay Area Governments Regional Housing Needs Allocation Factors and Weights Method Options, Spring 2020



Source: https://abag.ca.gov/sites/default/files/hmc_rhna_methodology_update_april2020.pdf

In the fall of 2020, the region's Housing Methodology Committee developed six methods and screened them according to criteria including:

- **Objective 1:** Does the allocation increase the housing supply and the mix of housing types, tenure and affordability in all cities and counties within the region in an equitable manner?
- **Objective 2:** Does the allocation promote infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns and the achievement of the region's greenhouse gas reductions targets?
- **Objective 3:** Does the allocation promote an improved intraregional relationship between jobs and housing, including an improved balance between the number of low-wage jobs and the number of housing units affordable to low wage workers in each jurisdiction?
- **Objective 4:** Does the allocation direct a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category?

²⁷ Jobs-housing fit refers to the "extent to which locally available housing fits the ability of locally employed workers to afford it." See <https://www.americanprogress.org/issues/economy/reports/2020/08/10/488313/expanding-supply-affordable-housing-low-wage-workers/>, by Michela Zonta, dated August 10, 2020.

○ **Objective 5:** Does the allocation affirmatively further fair housing?²⁸

A final allocation will be approved by the region after consideration of these recommendations.

A critique of California's regional housing needs allocation process cited lack of local government implementation of policies that increase housing supply and diversity and corresponding lack of enforcement by the state.²⁹ Oregon's statewide housing policy requires implementation include a continuous review of housing need projections and a process for accommodating those needed revisions.³⁰

Regional Housing Studies and Strategies

Many housing issues cross boundaries and strategies of one community may influence another. Regional housing studies can form the basis for coordinated housing policies and strategies. Coordinating across communities can build understanding of the region's housing market and leverage resources to achieve regional housing strategies that more fully address needs than any jurisdiction can do on their own. Example efforts and strategies across Washington state include, but are not limited to:

- [Chelan Valley Housing Needs Assessment](#), 2018, and resulting [Chelan Valley Housing Trust](#)
- King County Regional Affordable Housing Task Force, [Final Report and Recommendations for King County, WA, 2019](#)
- [Puget Sound Regional Council, Regional Housing Needs Assessment and Regional Housing Strategy, 2021](#)
- Skagit County Council of Governments, [Housing Inventory and Transportation Analysis Report, 2017](#) and [Skagit County Housing Action Plan, 2017](#)
- Snohomish County [Housing Affordability Regional Taskforce \(HART\), 2019](#)
- [South King County Housing and Homelessness Partners \(SKHHP\)](#)
- Walla Walla Regional Housing Action Plan, 2021
- Lacey, Olympia, Tumwater Regional Housing Action Plan, 2021

²⁸ ABAG describes "affirmatively further fair housing" as focusing "on overcoming patterns of segregation and fostering inclusive communities."

²⁹ See Bromfield et al, 2017: <https://medium.com/the-block-project/ensuring-fair-shares-of-housing-across-local-jurisdictions-324b5f525054>.

³⁰ Oregon Department of Land and Conservation and Development, [Oregon's Statewide Planning Goals & Guidelines: Goal 10: Housing](#)

Chapter 4. Housing Element Review

Reviewing and evaluating the current housing element is a recommended step for any jurisdiction that is undergoing a comprehensive plan update. The best time to conduct this review is after completing a preliminary housing needs assessment and after the county has developed new CPPs that address housing and population growth. This chapter provides guidance on how to carry out a housing element review.

Purpose of a Housing Element Review

A housing element review can serve several purposes:

- Assess the alignment of goals and policies with:
 - Growth Management Act goals
 - CPPs and MPPs (for jurisdictions in the Central Puget Sound region)
 - Other comprehensive plan elements
 - Current and projected housing needs in your region and jurisdiction
 - Community vision and engagement findings
 - Regional plans and initiatives
- Evaluate progress in meeting housing targets or objectives for housing types
- Consider new opportunities that were not foreseen by the current comprehensive plan
- Review the future land use map and designations for potential to meet housing needs
- Identify related infrastructure or service needs, including those that are barriers to new housing development
- Consider reasonable measures identified in buildable lands reports

The findings from a housing element review can inform the development of new goals and policies (see [Chapter 5. Updating Goals and Policies](#)) as well as strategies for effective implementation.

Review of Housing Element Goals and Policies

Alignment with GMA

First and foremost, the housing element review should confirm whether the element reflects the GMA goal for housing (see sidebar). During this review, the following questions should be considered:

- Do housing element policies reflect the GMA goal for: housing production; a variety of housing types, densities and price points; and housing preservation?
- Is the housing element update consistent with the latest GMA requirements (tip – see [Commerce's Periodic Update Webpage](#))? The GMA is frequently updated and new requirements may present a need for policy updates.

In their efforts to align with GMA, some communities approach housing policy as a balancing act between encouraging new types of housing development to meet housing needs and "ensuring the vitality and character of established residential neighborhoods" as called for in RCW 36.70A.070(2). It is important to keep in mind that these two

"Encourage the availability of affordable housing to all economic segments of the population of this state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock."

Growth Management Act Housing Goal, RCW 36.70A.020(4)

goals are not necessarily in conflict. All neighborhoods and communities in Washington will change over time as residents move in and out and the demographic profile of our population continues to evolve. Planners have an important role to play in making sure that our neighborhoods can also evolve and change over time to adapt to the changing needs of residents. Policies that seek to preserve neighborhoods from any new forms of development can contribute to housing supply shortages and the displacement of long-time residents when housing costs escalate. These outcomes fail to align with the GMA housing goal and can detract from the vitality and character of established neighborhoods.

Alignment with CPPs and MPPs

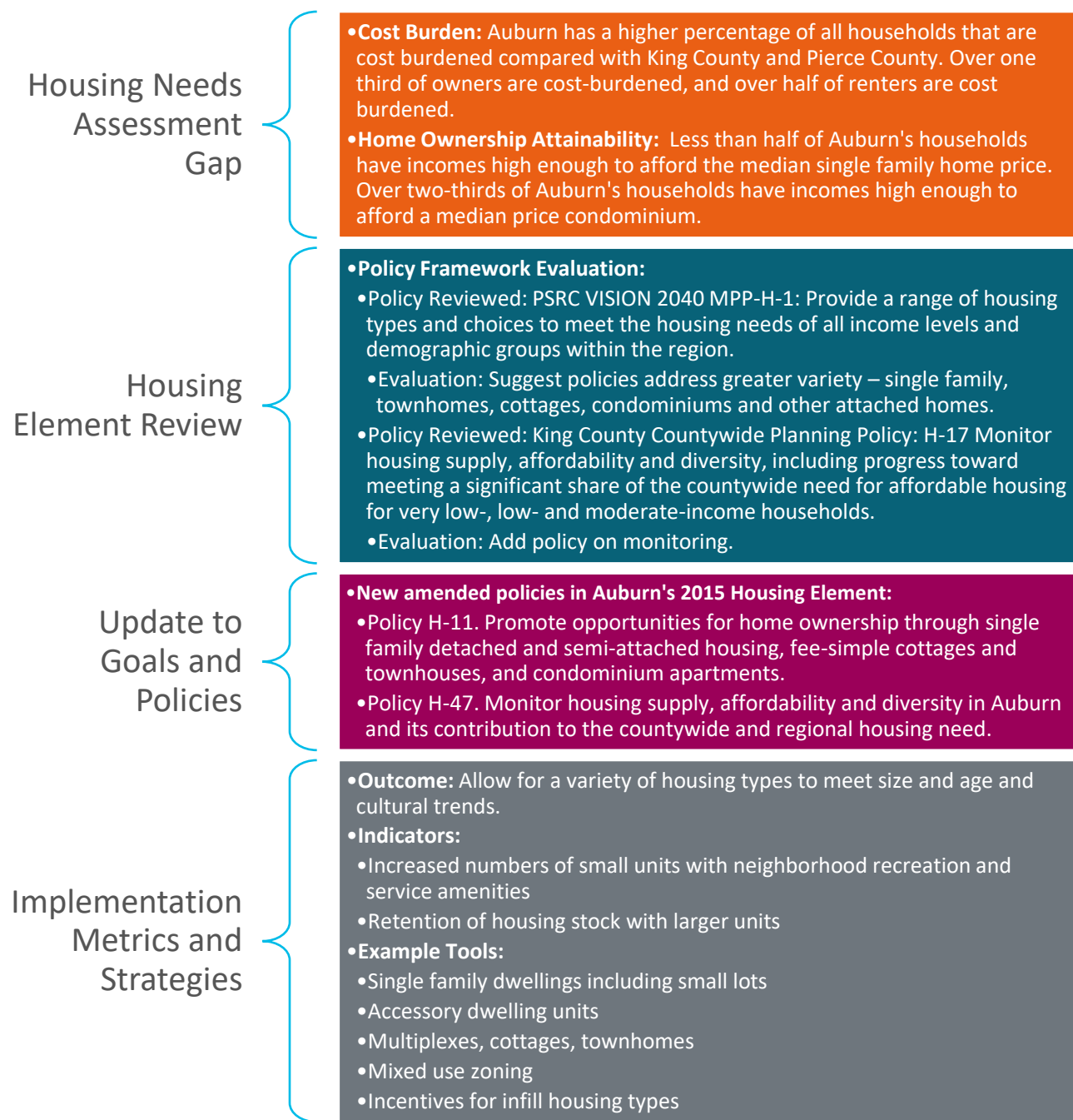
As discussed in Chapter 2, the housing element must be consistent with, and help to implement, countywide planning policies. Therefore, the housing element review should consider whether the goals and policies are, in fact, consistent with CPPs (and MPPs, where applicable). It should also consider whether those goals and policies help to implement CPPs/MPPs at the local level.

For example, during the City of Auburn Housing Element Update (2015), planners reviewed housing policies from PSRC VISION 2040, including MPP-H-1: "Provide a range of housing types and choices to meet the housing needs of all income levels and demographic groups within the region." The city's own housing element partially implemented this policy (e.g., mixed use, accessory dwelling units (ADUs), manufactured homes) and needed some adjustment to add additional housing types (e.g., single family - small lots, townhomes, cottages, and other attached homes) to further promote housing diversity. Therefore, the city identified a new policy in its housing element update: "Policy H-11. Promote opportunities for home ownership through single family detached and semi-attached housing, fee-simple cottages and townhouses, and condominium apartments." This is a simple example of the types of findings that a housing element review can reveal. [Exhibit 21](#) provides additional details about Auburn's housing element review process.

WAC 365-196 defines consistency as: "...no feature of a plan or regulation is incompatible with any other feature of a plan or regulation. Consistency is indicative of a capacity for orderly integration or operation with other elements in a system."

Vision 2040 has been updated into Vision 2050 applies to King, Pierce, Snohomish and Kitsap counties, as well as cities, towns, ports, state and local transportation agencies, and tribal governments within the region. It includes 12 housing policies to guide the development of countywide planning policies and local policies ([Exhibit 12](#)). It also includes five local actions to address the housing policies at the local level. This progressive and comprehensive document is likely to be useful to other Washington communities as they develop countywide planning policies and comprehensive plan goals and policies.

Exhibit 21. Example - Auburn Housing Element Update, 2015



This example walks through how the City of Auburn's housing element review aligned with findings from their housing needs assessment, update to goals and policies, and ultimately their implementation metrics and strategies.

Source: City of Auburn 2015 Comprehensive Plan Update; BERK, 2020

Alignment with Housing Needs

A community's housing element policies will be most effective if they recognize the diverse housing needs of its population including affordability, life cycle, cultural desires and others. The housing needs assessment is the primary way to identify these needs and gaps. Review existing policies to see whether they guide and authorize actions to address these needs, or if they need updates to reflect changes in the community. The example from Auburn's [2015 Comprehensive Plan Update](#) (Exhibit 21) shows the link between gaps identified in their housing needs assessment and new housing policies selected to address those gaps.

Alignment with Community Vision and Engagement Findings

Through the public engagement process, planners may find qualitative housing needs not seen in data and the interrelationships of housing and services. For example, Auburn found in its [housing needs and characteristics assessment](#) a concern about the cost of assisted living with seniors, and a desire for improved safety and children's play areas affecting quality of life for a Latinx community. These kinds of insights can also inform the housing element review and development of updated goals and policies.

Alignment with Regional Plans and Initiatives

The review should also consider whether the housing element is aligned with, and implements, regional plans and initiatives, such as regional transportation plans or countywide homeless housing plans. For example, consider questions such as:

HOMELESSNESS PLANNING

In 2006, the Washington state Legislature passed the Homeless Housing and Assistance Act ([RCW 43.185c](#)) directing Commerce to [grant document recording fees](#) to local governments to help meet the need of homeless families and individuals. This includes writing a local five-year plan to address homelessness, responsibility for administering the annual [Point-in-Time Count](#), reporting client data in the [Homeless Management Information System](#), conducting outreach to landlords, ensuring [coordinated entry](#) and more. Lead grantees are also responsible for ensuring their homeless crisis response system prioritizes people most in need and that services meet funders' performance expectations. As your housing element should consider countywide housing needs, policies should be consistent with the needs identified in the five-year and Continuum of Care (CoC) plans. Countywide planning policies should also be considering these plans to align strategies and approaches on a countywide basis.

The following definitions are used with homelessness planning:

- Emergency shelter provides temporary shelter for people experiencing homelessness.
- Rapid rehousing quickly moves homeless people into permanent housing by providing temporary rent subsidies and housing-focused case management. The household does not have to leave when services end.
- Transitional housing provides housing for no longer than 24 months and is designed to move people experiencing homelessness into permanent housing.
- Homeless prevention resolves imminent homelessness with housing-focused case management and temporary rent subsidies. The services are time-limited and the household does not have to leave when services end.
- Permanent supportive housing is subsidized, non-time-limited housing with support services for homeless households that include a household member with a permanent disability.

The [Homelessness & Housing Toolkit for Cities](#) produced by Association of Washington Cities and Municipal Research and Services Center (MRSC) (2020) provides resources and case studies.

- Does your housing element and comprehensive plan concentrate higher densities of housing in areas of opportunity such as designated centers and transit hubs?
- Does your housing element promote greater access to jobs and services, particularly among residents with low- and moderate-incomes?
- Does this analysis identify logical places for higher density housing with infrastructure or priorities for investment in capital facilities to further the regional and local land use plan?
- Are the land use, transportation and capital facilities elements also consistent with the regional plan?

RURAL HOUSING

Rural elements must protect rural character and provide for a variety of rural densities (RCW 36.70A.070(5)). Counties should define rural development both in terms of its visual character and in terms of the density and intensity of uses (WAC 365-196-425 (2)(c)).

Clustering and density transfer are some potential tools to protect rural character. Counties should establish a limit on the size of residential cluster so that a cluster does not constitute urban growth in a rural area; it is possible to have multiple smaller clusters that are separated from each other and use a different access point (WAC 365-196-425 (5)(b)).

There are also opportunities to define Type 1 limited areas of more intensive rural development (LAMIRDs), which recognize pre-GMA villages and allow for infill. Infill development or redevelopment in Type 1 LAMIRDs may be allowed and encouraged if it is consistent with the character of the LAMIRD's building size, scale, use and intensity (WAC 365-196-425 (6)(b)).

Accessory dwelling units (ADUs) can provide extra units but should be planned carefully in rural areas. The ADU should share infrastructure and be secondary to the primary unit.

Policy examples include:

Walla Walla County: Policy RL 2.2 - "Encourage affordable housing opportunities that are compatible with rural character, including farm worker housing and accessory dwelling units."

Snohomish County: LU Policies 6.B.1 - "Use of a clustering subdivision technique should be encouraged ... to 1) preserve the rural character of Snohomish County; 2) avoid interference with resource land uses; 3) minimize impacts upon critical areas; 4) allow for future expansion of the UGAs, where appropriate, and 5) support the provision of more affordable housing in rural areas. ... Modest density incentives should be provided in a manner which encourages use of the technique and maximum preservation of open space and maintenance of rural character ..."

Alignment with the Comprehensive Plan

It is a requirement for comprehensive plans to be internally consistent.³¹ This means that all elements of the plan include goals and policies that are both consistent and mutually supportive. An important step in the housing element review is to compare the goals and policies in the housing element to those in other elements, such as land use, capital facilities and economic development. For example, this review could

³¹ RCW 36.70A.070

identify issues such as whether the land use element and future land use map designate sufficient land for higher density housing development to meet identified housing needs, and whether that housing capacity is focused in areas with investments in public transportation and other supporting facilities. Have you considered programming investments in areas that need facilities in order to develop? Along with the land use element, counties should also review rural elements at the same time as the housing element update. (See "Rural Housing" sidebar above.)

Consider Opportunities and Trends Not Foreseen by the Comprehensive Plan

The housing element review can highlight new opportunities for development including surplus public land, changing land needs and other trends that may have come about after the last comprehensive plan update. Land may no longer be needed for its original purpose, and new opportunities for housing can present themselves. For example, former military or institutional sites, power and utility properties, vacant commercial areas and others can be locations for new housing opportunities. Major transportation investments may also bring opportunities for new transit-oriented development (TOD). See sidebar for examples.

Examples of New Opportunities

Non-Residential Sites Converted to Mixed Use

- [Vista Field, Kennewick](#), former airport
- [Southport, Renton](#), former power plant

Major Transportation Investments and TOD

- Bothell, SR-522 and SR-527 Improvements and [Downtown Revitalization Plan](#)
- Seattle, Othello Station light rail station and [transit oriented development](#)

Societal and cultural trends can also shape housing needs and land use implications. While some topics like demographic trends should be identified and considered in the housing needs assessment, other topics may be worth considering for their implications. For example, previous comprehensive plans could not have anticipated the rapid shift to widespread teleworking that occurred in 2020 due to COVID-19. There are signs this shift could have permanent impacts in some economic sectors, as could the increasing use of retail delivery. Planners may also consider how technological changes looming on the horizon, such as autonomous vehicles, have the potential to impact housing and land use before the next comprehensive plan update. Another trend to look for is short term rentals which may take available homes off the market. A quick review of some of the rent by owner websites can tell you whether this is an issue in your community. MRSC provides guidance on this topic.³²

Another example is the increased focus on equity and past discrimination, and the need to address exclusionary zoning policies in local plans. Local governments should review how discrimination may have affected land use and housing policies. Displacement may also be a factor where redevelopment and public investment are planned. Policies should guide how potential displacement will be avoided and mitigated.

Evaluating Progress towards Growth Targets

Many jurisdictions have targets or objectives for either population or housing growth. These may be found in countywide planning policies, the county or city comprehensive plan, or other programs. [Chapter 2. Housing Needs Assessment](#) provides guidance on how to measure progress towards these targets. The housing element review should consider the findings of this analysis and its implications for progress towards achieving goals and policies. It should also consider whether total housing growth targets should be broken

³² See MRSC's [12 Examples of Short-term Vacation Rental Regulations](#) and other webpages.

down by housing types to promote new housing production that is more closely aligned to housing needs (see "Targets by Housing Unit Types" below). Adjustments to goals, policies or implementing actions may be necessary when housing production is not keeping pace with targets, or when the diversity of new housing produced does not align with housing needs.

Policies for Monitoring Progress

Some jurisdictions also include policies regarding monitoring progress towards housing growth targets. See [Exhibit 21](#) for an example from the City of Auburn, or [Exhibit 22](#) from Snohomish County. These represent good first steps for developing an annual monitoring program to track growth trends and support course-correction as necessary in between comprehensive plan updates. See [Chapter 8. Implementing and Monitoring Your Housing Element](#) for more details on monitoring.

Exhibit 22. Example of a Monitoring Policy: Snohomish County HO Policy 4.B

Objective HO 4.B: "Track the provision of affordable housing units to assess whether an adequate supply of housing affordable to the county's lower income and special needs residents, as defined in the Housing Characteristics and Needs report for Snohomish County, is being provided."

Policy 4.B.1: "In support of countywide housing policies, the county shall seek partnerships with other jurisdictions, through the Alliance for Housing Affordability, the Housing Consortium of Everett and Snohomish County, Snohomish County Tomorrow and similar forums, to track the provision of housing by type and affordability. This effort will include an assessment of progress toward meeting the county's housing goals, including housing that addresses the needs of households within the Under 30% area median income (AMI), 30-50% AMI and 51-80% AMI segments, as projected in the current Housing Characteristics and Needs Report for Snohomish County."

Policy 4.B.2: "Based upon the monitoring and evaluation results from Policy 4.B.1, the county shall evaluate the effectiveness of its zoning regulations to produce housing developments that meet the diverse housing needs identified in the Housing Characteristics and Needs Report for Snohomish County."

Source: <https://snohomish.county.codes/CompPlan/GPP-HO>

Targets by Housing Unit Types

The GMA housing goal is to "[e]ncourage the availability of affordable housing to all economic segments of the population of this state, promote a variety of residential densities and housing types." This goal can be supported by developing targets for specific housing types in goals and policies, as detailed in WAC 365-196-410 (2)(d) and (2)(e). When developing these targets, it often makes sense to consider broad categories that are associated with local zoning, such as detached single family, attached single family (or "missing middle"), and multifamily. This makes it easiest to compare targets for these housing types to capacity in land zoned for these housing types. Some communities also adopt targets for subsidized and income-restricted affordable housing production. As described in Chapter 3, these kinds of targets are sometimes adopted in CPPs. They can also be adopted by individual cities.

There are several types of findings from the housing needs assessment that can be used to help evaluate which kinds of housing are likely to be in greatest need or demand. A few examples to consider are:

- **Housing costs:** Consider how the affordability of various housing types lines up with local incomes. Are new single-family homes affordable to middle-income families in your community? Are ownership housing types available at lower price points, such as townhomes or condominiums? What income level is needed to afford local apartment rents? Based on this analysis, consider what kinds of units are most likely to be affordable at each income level. The answer to this question may vary based on local market conditions and should be analyzed with best available housing market data.³³ [Exhibit 23](#) provides an example of aligning income level to housing types. [Exhibit 24](#) provides an example of how projected housing needs might be broken out by housing type for Walla Walla and neighboring jurisdictions.
- **Household incomes:** Select a mix of housing types that align with the household incomes in your community. For example, if over half of the households in a jurisdiction have incomes below 50% of area median income (AMI), then the housing targets should assume at least over half of housing growth will be in types that are more likely to be affordable to these households. See [Exhibit 23](#) and [Exhibit 24](#). [Exhibit 25](#) shows an example of projected housing needs by income level for the Walla Walla region.

Exhibit 23. Assumptions about Housing Types Needed for Various Income Segments

Household Income Level	Housing Types (Examples only: Conduct local market analysis for you area)
Greater than 120% AMI	Single family homes
80 - 120% AMI	Small lot single family, cottage homes, townhomes, row houses, condominiums
50-80% AMI	Apartments, accessory dwelling units
30-50% AMI	Manufactured homes, subsidized apartments, single-room occupancy (SRO), shared housing
Below 30% AMI	Subsidized apartments, tiny homes villages, permanent supportive housing

Note: Housing types can fit in more than one income bracket.

Exhibit 24. Projected Housing Need by Housing Type, Walla Walla Region, 2021

Projected 2040 Housing Needs						
Housing Type	Walla Walla UGA	College Place UGA	Waitsburg UGA	Dayton UGA	Walla Walla Region	Remainder of Walla Walla County
Single-Family Detached						
Standard Lots	1,142	261	112	9 +	1,523	225
Small Lots, cottages, mfg. homes (lots)	899	205	-	-	1,104	-
Townhouses / Plexes (units)	556	155	19	1 +	732	-
Multi-family units (5+ units per structure)	816	78 +	-	-	894	-
Mobile homes/ADUs/other (units)	297 +	78 +	56 +	3 +	433	56 +
Total Dwelling Units	3,710	776	187	13 +	4,685	282

Source: FCS Group, [Walla Walla Regional Housing Action Plan, Task 2: Housing Needs Assessment](#), 2020

³³ Multiple Listing Services (MLS), a tool such as [Zillow](#), or the Washington [Center for Real Estate Research](#).

Exhibit 25. Projected Housing Need by Income Level, Walla Walla Region, 2021

Family Income Level	Owner-Occupied	Renter-Occupied	Total	Dist. %	Attainable Housing Products
Upper (120% or more of MI)	2,361	260	2,621	56.0%	Single Family Lots
Upper Middle (80% to 120% of MI)	384	347	730	15.6%	Cottage Homes, Townhomes, Apartments
Lower Middle (50% to 80% of MI)	207	693	900	19.2%	Townhomes, Mfgd. Homes, Plexes, Apartments
Low (less than 50% of MI)	0	433	433	9.3%	ADUs, Govt. Assisted Apts.
Total	2,952	1,734	4,685	100.0%	

*Derived from Appendix A.

Source: FCS Group, [Walla Walla Regional Housing Action Plan, Task 2: Housing Needs Assessment](#), 2020

- Housing tenure:** A healthy housing stock includes a mix of ownership and rental housing. While any housing unit type can be rented, multifamily products like apartments typically provide the most cost-effective way to increase the supply of rental housing. Also consider needs for lower cost ownership products, such as townhouses or small lot single family, to help make homeownership attainable to more residents.
- Household sizes:** An HNA should present breakdowns of owner- and renter-households by size (number of members living together). Comparing this breakdown to the current housing stock can reveal misalignments, such as a shortage of smaller units for 1 and 2 person households, or a shortage of larger renter housing for low-income families.
- Gaps in the current housing supply:** Jurisdictions should also consider and account for current shortages in the housing stock which can be addressed through future growth. For example, a housing market analysis could estimate only 1,000 units are affordable to households with incomes between 30% and 50% AMI, but in fact there are 2,500 households in this category. This indicates a gap of 1,500 units that are affordable to households at this income level.
- Worker housing needs:** The workforce profile section of an HNA can identify housing needs among workers, including those who live outside of the jurisdiction. In many communities, low- and even moderate-wage workers commute long distances to their jobs due to a lack of affordable housing options within the jurisdiction. Consider using information about the number of workers in these categories and/or employment projections to inform housing targets.

- **Special needs populations:** The HNA should also identify special housing needs, such as housing for the elderly, which are forecast to increase as the baby boomer generation ages. These needs can also be considered in your targets, housing policies and design standards.

There is no one correct way to translate these kinds of findings to targets by housing type. However, these findings can be used to inform the selection of targets. Engagement with local housing stakeholders, employers or service providers can also provide insights regarding issues and needs to consider when setting targets. The goal is to select targets for production by housing type that are aligned with the expected income levels and housing needs of current and future residents.

Review the Future Land Use Map and Designations

Future land use maps and corresponding designations function like the "heart" of a comprehensive plan, and are usually found in a plan's land use element. Getting these components right is critical in creating an effective plan ultimately meeting the community's growth targets, goals and policies. A well-crafted land use map and corresponding designations can simplify the development process and ultimately facilitate production of the types of housing necessary to address community needs.

Using the findings from your community's HNA, how can the map and designations be updated to meet those needs? While there is likely to be a general need to increase the overall housing supply, the HNA may illustrate key gaps in specific types of housing that will guide the efforts in map and land use designation updates. The solution is likely to involve a combination of strategies.

Strategies for crafting a good land use map and designations easily warrants an entire guidebook on its own. This guidebook focuses on a handful of land use designation and mapping components and strategies:

- **Alignment with goals, policies and growth targets:** As discussed above, examine whether the designations and map align with the community's housing needs, vision and engagement findings, regional transportation system and growth targets (see [Exhibit 29](#)). From a mapping perspective, are adjustments needed to:
 - Update the boundaries of existing designations? Perhaps a mixed-use or multifamily designation could be extended a block or two based on a combination of evolving context, community needs, planned transportation infrastructure and/or community engagement?
 - Change to another designation? Perhaps an existing designation such as commercial or office isn't developing due to changing trends in shopping and work. A change to another existing designation might be better suited to the evolving context and community needs and objectives.
 - Create a new designation? Sometimes, key sites or areas warrant creation of a new designation to help fit the evolving context and community needs and objectives.

- Simplify and/or reduce the list of land use designations? Ideally, comprehensive plan future land use maps are not the same as the zoning maps. When they are, each rezone will require a comprehensive plan amendment, which is a lengthy process that delays new housing. The plan works better when it employs broad, rather than narrow, land use designations. For example, two or three implementing zones under one land use designation allow more flexibility with future rezones and responses to unforeseen market changes (see Prosser sidebar at right). [Exhibit 28](#) below illustrates an example of this.
 - Completely update the map and designations to fit new approach? In some cases, the map and designations are so out of date that communities seek a new approach to fit the evolving context and community needs and objectives.
- Make the map and designations clear and usable. Many land use maps and designation text aren't easy to read. Specifically:
- The designations on the map and legend should be very easy to follow.
 - The colors/patterns and order of land use designations should be logical (see [Exhibit 26](#)).
 - Simple and descriptive naming conventions are also helpful.

The City of Prosser's recent comprehensive plan update is another good example of simplifying land use designations, as it consolidates residential areas into two designations: (1) Residential, and (2) Steep Slope Residential. This allowed for three higher density rezones and the City's first private affordable housing development, which would not have been allowed under the previous comprehensive plan.

Exhibit 26. Typical Land Use Map Colors

Yellows	Single family residential	Blues	Institutional/public
Oranges	Low density multifamily	Purples	Industrial
Browns	High density multifamily	Greens	Park/recreational
Reds	Retail/commercial	Grays	Utilities

- Include descriptive purpose statements, including a summary of principle uses and densities. Land use designation purpose statements aren't required, but they can be a useful communication tool and helpful in describing unique locational attributes and/or community intentions that may apply. It's important here to provide a useful description without getting too detailed. In some cases, it may make sense to establish appropriate density ranges or maximums. It's better to leave other dimensional standard details to the zoning code. See [Exhibit 27](#) below for an example.
- Align the land use designations with their implementing zoning districts. Comprehensive plans should provide clear guidance on future city and privately-initiated rezone applications. For each land use designation, providing the list of implementing zoning designations is an obvious solution (see the case studies in [Exhibit 27](#), [Exhibit 28](#), and [Exhibit 29](#) for good examples). Some designations may have only one implementing zone, while most others include multiple implementing zones. In such cases where there are multiple implementing zones, it's important to add language in the land use designation descriptions (and even more important in the purpose statements for the zones in the zoning ordinance) to help guide the siting of the various zones. Simple example: "The permitted density is between 4 and 8 dwelling units per gross acre, depending on the established development pattern and character of the area."

Example Land Use Designations: Anacortes Comprehensive Plan

Anacortes's land use designation statements were crafted after an intensive community engagement process with close analysis of alternative lot sizes, densities and permitted housing types for each designation and implementing zone.

Exhibit 27. Land Use Designations in Anacortes

Table LU-1. Land use designations.

The allowed uses and densities noted herein are intended as a summary of key provisions to guide implementing zoning codes, and not as a complete description of all possible uses.

"Special topics to explore" are intended to document future potential considerations that may warrant additional review.

Land Use Designation	Implementing Zoning Designation
<p>Residential Low Density 2</p> <p><u>Purpose:</u> This designation provides for low density residential development in mostly established neighborhoods throughout the City. These areas are inappropriate for more intensive urban development due to the established character of the area and/or due to the area's separation from transit uses and commercial services.</p> <p><u>Principal uses & density:</u> Single-family detached dwellings are the predominant dwelling type. Other dwelling types, such as duplexes, accessory dwellings and cottage housing may be allowed under certain circumstances. The permitted density is between 4 and 8 dwelling units per gross acre, depending upon the established development pattern and character of the area.</p> <p><u>Special topics to explore:</u> Accommodate affordable housing and tiny houses (see Housing Element). Explore option for 6,000 sf lots where compatible with existing development (east of Anacopper Mine Rd.).</p>	<p>R2, R2a</p> <p>Criteria that guides the location of designations and implementing zones</p> <p>Integrating some flexibility for additional housing types in implementing zones. The density range also allows flexibility for the zones.</p>
<p>Residential Medium Density</p> <p><u>Purpose:</u> This designation provides for moderate density residential neighborhoods on lands that are suitable for urban development. These areas are conveniently located in relation to traffic routes, public utilities and community facilities.</p> <p><u>Principal uses & density:</u> Single-family detached dwellings are the predominant dwelling type. Other dwelling types, such as accessory dwellings, cottage housing, and low density multi-family may be allowed under certain circumstances. The permitted density is 7-14 dwelling units per gross acre, depending on the particular housing types used and established development pattern and character of the area.</p> <p><u>Special topics to explore:</u> Accommodate tiny houses (see Housing Element), reduce minimum lot size to 4,500 sf, and explore option for 3,000 sf lots where consistent with historic plats. Consider uses that provide neighborhood gathering places.</p>	<p>R3 R3a</p> <p>As noted above, "special topics" are intended to document future potential considerations that warrant additional review.</p>

Source: City of Anacortes Comprehensive Plan, 2016; MAKERS, 2020

Example of Implementing Zones: City of Yakima Comprehensive Plan

Exhibit 28 shows a simple chart from the City of Yakima Comprehensive Plan that clearly spells out the implementing zones for each land use designation. Note that there are two implementing zones for each of the two residential designations. The "Community Mixed-Use" designation includes five implementing zones, allowing flexibility based on the context and community objectives.

Exhibit 28. Land Use Designations and Implementing Zoning Districts in City of Yakima

Zoning District	Land Use Designation						
	Low Density Residential	Mixed Residential	Community Mixed-Use	Commercial Mixed-Use	CBD Commercial Core	Regional Commercial	Industrial
SR	X						
R-1	X						
R-2		X					
R-3		X	X				
B-1			X				
B-2			X				
HB			X				
SCC			X				
LCC				X			
GC				X			
CBD					X		
M-1							X
M-2							X
RD						X	
AS				X			X

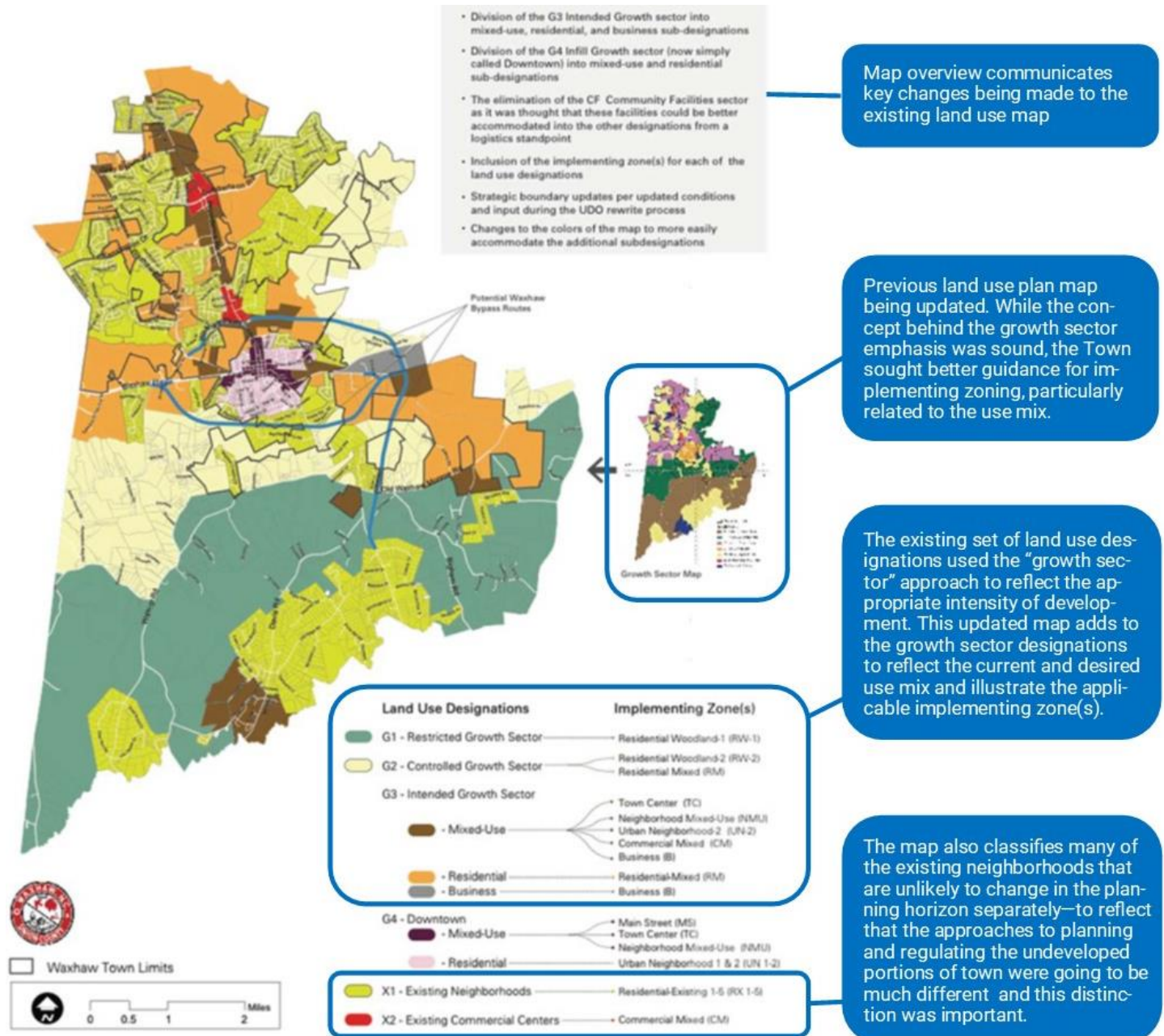
The blue shaded boxes denote the implementing zoning district for the applicable land use designation.

Source: Yakima Comprehensive Plan, 2017

Example: Town of Waxhaw (North Carolina) Comprehensive Plan

Waxhaw is a rapidly growing suburb of Charlotte that features a historic downtown and numerous stream corridors and wetlands. The community sought ways to better protect the character of established neighborhoods while promoting compatible infill in historic areas and a greater mix of housing types and better subdivision design in areas identified for growth. The map shown in [Exhibit 29](#) adds a finer level of detail to help guide the City's future zoning map decisions.

Exhibit 29. Waxhaw Future Land Use Map



Source: Town of Waxhaw Comprehensive Plan Policy Bridge, NC, 2016, MAKERS, 2020

Identify Related Infrastructure or Service Needs

When evaluating the housing element, the type and location of housing should be supported by necessary infrastructure, or it may impede the timing, cost and quality of housing. Evaluating infrastructure needs in already built communities can help support infill development and protect existing affordable housing. Anticipating new infrastructure needs in redeveloping or newly developing areas can help facilitate desired growth and increase housing variety and supply. Based on the evaluation, supporting housing element and capital facilities plan element policies and implementing regulations can be developed that show a balance of public and private responsibilities and incentives.

Costs: New residents can increase demand for transportation, parks, schools and public safety. Local governments and special districts are required to develop system plans and system development or connection charges for improvements to water, stormwater, sewer and other infrastructure designed to address increased demand.

A critical part of a community's growth strategy is assessing what infrastructure is needed to support the growth strategy and estimating the cost. Communities then must decide how to allocate those costs between new development and existing residents and rate payers. Impact fees, system development charges, certificates of concurrency or State Environmental Policy Act (SEPA) mitigation are all different strategies to link the financing and construction of needed infrastructure to the pace of new development driving the need.

To support affordable housing, local governments can structure fees to recognize differences in demand and costs and housing goals (see sidebar), as well as consider deferrals and exemptions. These structures should be guided by policy. For example:

- Tukwila waives park impact fees for accessory dwelling units (Ordinance 2599).
- Port Townsend allows deferrals of connection fees for affordable housing until units are occupied (PMC 13.03.115).

ACCURATELY ASSESSING THE IMPACT OF IMPACT AND UTILITY CONNECTION FEES

For the sake of simplicity, communities tend to base impact fees on average impacts of a residential unit when the marginal impact of a particular unit can vary greatly. The structure of how these charges are assigned to duplexes, triplexes and accessory dwelling units (ADUs) can influence the development of these types of units.

For example, a new unit on an existing lot near the center of town with good transit access can generate significantly less demand for infrastructure than a new unit on a relatively large lot on the edge of town. Lower average trip distance, compact development patterns and use of existing infrastructure all tend to reduce marginal cost of serving infill development. The City of Spokane has recognized this correlation and implemented significantly reduced transportation impact fees for housing in the downtown area, compared to areas outside of the downtown.

A system reliant on average costs will tend to subsidize expensive development types (such as large single-family homes at the periphery) and overcharge less expensive development types (such as infill ADUs), creating an incentive to build more costly housing types.

Carefully examining how you calculate the charge for different housing types in different parts of the community can help identify when you are sending signals to the market at cross purposes with your community goals. This same type of review can be applied to connection fees as well.

Gaps, Phasing and Urban Densities: Local governments can review gaps in the sewer, water, transportation and other systems and prioritize funding and phasing mechanisms. A first step should be prioritizing appropriate areas for infrastructure to support higher density housing. Where urban infrastructure is not fully available or is scheduled for later years in the capital facilities plan, jurisdictions can set regulatory standards to maintain the ability to achieve urban densities in the long run while allowing for some incremental development in the meantime.

Examples include requiring building placement that preserves the ability to achieve future urban densities and allowing for interim water and interim septic systems provided such systems allow for full-service connections in the future (also called shadow platting). Example communities with such standards include Pierce County interim urban septic systems and City of Chelan rural to urban transition standards. If certain areas are too difficult or too expensive to serve, they could be considered for removal from the urban growth area. Review [WAC 365-195-320](#), which notes the limited circumstances in which reduced infrastructure is acceptable, and review Commerce's 2012 [Urban Growth Area Guidebook](#).

Consider Reasonable Measures Identified in Buildable Lands Reports

In buildable lands jurisdictions³⁴ (Clark, King, Kitsap, Pierce, Snohomish, Thurston and Whatcom counties, and the cities and towns within their boundaries), RCW 36.70A.070(2) requires that "any revision to the housing element shall include consideration of prior review and evaluation reports and any reasonable measures identified." Reasonable measures often include strategies to encourage more housing production, or the production of higher density housing types that are in short supply. When reviewing the housing element, consider whether the goals and policies are consistent with, and supportive of, these reasonable measures.³⁵

Next Steps

The housing element review should identify a list of issues to address in the housing element update. These may include the need to revise, consolidate or write new housing goals and policies. Guidance for this step is provided in [Chapter 5. Updating Goals and Policies](#). See [Chapter 6. Identifying Strategies to Implement Your Policies](#) for housing strategies to implement your housing goals and policies. The review might also reveal the need for the development of an implementation plan or stronger monitoring program. Guidance for these topics is provided in [Chapter 8. Implementing and Monitoring Your Housing Element](#).

³⁴ Those subject to the review and evaluation requirements of RCW 36.70A.215.

³⁵ Examples of reasonable measures are in Appendix 2 of the [Housing Memorandum: Issues Affecting Housing Availability and Affordability](#).

Chapter 5. Updating Goals and Policies

This chapter provides guidance for crafting clear and effective goals and policies for your housing element.

What are Goals and Policies?

Goals and policies in a housing element should describe how the community proposes to address identified needs and wants. They should articulate local priorities for the production of specific housing types, housing design, housing affordability, preservation of existing housing and allocation of local resources.³⁶

Even in comprehensive plan updates, it's useful to take a step back and consider how goals and policies differ from each other. For the purpose of this guidebook and crafting goals and policies in comprehensive plans, consider the following definitions:

- **Goal.** Goals are statements of desired outcomes or intended achievements. For example: "Provide for a range of housing opportunities to address the needs of all economic segments of the community."
- **Policy.** Policies are specific statements guiding actions and implying commitment to these actions. Policies provide the framework for future decisionmaking and authorization for regulations to implement the policies. Policies may express intent, such as: "Encourage townhouses and multifamily development designed and scaled consistent with the surrounding neighborhood." Policies may also describe an action to be taken. For example: "Allow townhouses and multifamily development designed and scaled consistent with the surrounding neighborhood."

A number of policies may be associated with each goal. For example, for the goal to zone for a variety of housing densities and types, policies may address various density or affordability incentives.

Goals and policy statements can be very specific if they are intended to describe a future accomplishment, or more general if they are intended to provide direction to later planning efforts and implementation decisions. Communities need to decide how specific they want to be in expressing goals and policies depending on the purpose and desired outcome.

When crafting goals and policies or reviewing them, the strength of the words makes a difference. Language like "encourage", "consider" and "should" are very tentative, exploratory words which could be used to articulate policies that the community would like to consider and include in their plan, but is not yet ready to implement. Language such as "allow", "ensure" or "require" are much stronger and point to policies that should be implemented in the near future. When reviewing your housing element, consider strengthening and adjusting policies by changing the words based on alignment with state law and alignment with your community's vision.

Regardless of the degree of specificity, goals and policies need to clearly and accurately describe the intended outcome. Many older comprehensive plans suffer from overly vague policy language that offers minimal guidance to future decisionmaking. More specific policies have a greater likelihood to produce results that meet the desired intent. [Exhibit 30](#) below, adapted from the City of Bellevue Transit Master Plan and illustrated in PSRC's 2014 Housing Element Guidance, provides guidance on crafting strong, active policies.

³⁶ Some of the content in this section is adapted from Washington's Department of Community Development's 1993 [Housing Element Guide](#).

Exhibit 30. Policy Strength Continuum



Source: PSRC, 2014

Housing goals and policies should be written to allow the evaluation of progress toward achieving the housing element's goals and policies. Clear language will help staff to review whether policies have been implemented or direct the community to evaluate the development of housing units of different types. See [Chapter 8. Implementing and Monitoring Your Housing Element](#).

Requirements and Guidelines for Housing Goals

The GMA provides direction on what should be in the housing element. The goal for housing is to encourage the availability of affordable housing to all economic segments of the population of this state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock. Countywide policies should be consistent with and reflect this statewide goal. Local goals and policies should also be consistent with this cascading policy hierarchy while also reflecting local needs and goals.

The GMA requirements for the housing element are to ensure the vitality and character of established residential neighborhoods and the element must include a statement of goals, policies, objectives and mandatory provisions for the preservation, improvement and development of housing, including single-family residences. Given that direction, housing goals should address the following:

- Working towards housing that is affordable to all economic segments of the population, with special consideration for the lowest income segments, recognizing that the market will not provide this without policy direction.
- Zoning for a variety of housing densities to encourage the development of a variety of housing types.
- Ensuring the vitality and character of established residential neighborhoods, recognizing that neighborhoods will change over time.
- Preservation and improvement of existing housing, especially affordable housing.

- Considering other local goals for housing to address local needs.

Recent Updates to Housing Laws

Some things are not policy choices and are required by law. You should review your policies to ensure they do not conflict with housing laws. Some recent housing laws are noted below, but you should review the full list in [Appendix C: Housing Law and Case Law](#). If you are considering policies on these topics, you may want to also provide more policy detail as to how your jurisdiction would apply these laws.

- **ADU Parking:** Cities may not require off-street parking for ADUs within ¼ mile of a major transit stop. More detail at [RCW 36.70A.696-698](#).
- **Affordable housing on religious property:** If asked, communities must provide a density bonus for affordable housing located on property owned by a religious organization. See RCW [36.70A.545](#).
- **New definitions** for affordable housing, low-, very low- and extremely low-income households at [RCW 36.70A.030](#).
- **Limits on parking requirements** for low-income, senior, disabled and market-rate housing units located near high-quality transit service at [RCW 36.70A.620](#).
- **Tiny homes and recreational vehicles:** cities and towns may regulate in manufactured home parks, tiny home communities and new definitions according to [RCW 35.21.686](#).
- **Surplus land for affordable housing:** local governments can sell or give land for a public benefit, defined as affordable housing in [RCW 39.33.015](#).
- **Smaller units:** local governments can eliminate minimum floor area requirements in [RCW 19.27.060](#).
- **No impact fees for emergency housing:** [RCW 82.02.090](#) provides an exemption from impact fees for emergency housing.

Hearings board and court decisions also have an impact on your local housing policies. You should be familiar with recent decisions. Refer to [Appendix C: Housing Law and Case Law](#) for a list of important decisions.

Updating Existing Housing Goals and Policies

Some comprehensive plan updates only require modest adjustments to the housing goals and policies, whereas other situations may call for a complete update. The nature of the update depends on a variety of factors:

- **Age and quality of the existing housing element.** Plans that are outdated and/or not easy to read usually warrant a complete update. These factors, along with changing housing needs and evolving community objectives, made it an easy decision for the City of Anacortes (see [Exhibit 31](#) below) to start over in their most recent update.
- **Changing physical context, including growth.** Rapidly growing outer suburb communities are a good example of a type of community that may need a complete update as their housing inventory and population change. Land-locked established suburbs with slower growth or population change, on the other hand, may only require some strategic adjustments to align with changing state laws or regional policies, and evolving local housing needs and community objectives.
- **Alignment with GMA, CPPs and MPPs.** The future land use map, land use designations and goals and policies should be reviewed to ensure they are consistent with changes to state law, or applicable county and multi-county planning policies. See Chapters 3 and 4 for details.
- **Changing demographics and housing needs.** As referenced in Chapter 2, the housing needs assessment is the primary way to identify the needs and gaps beyond the existing housing element. Integrating goals and policies to address evolving gaps in special needs housing will be important (e.g., senior housing, farmworkers, homelessness, and adults with disabilities), as discussed in Chapter 4.

- **Changing community objectives.** The public engagement process is likely to lead to adjustments in goals and priorities. Examples might be a greater emphasis in missing middle housing types, housing affordability, housing design and compatibility, and the location and type of growth.

Exhibit 31. Example Housing Affordability Goal and Policies in Anacortes's Comprehensive Plan

The City of Anacortes's most recent comprehensive plan update is a good example of a complete update, based on the age of the previous plan, evolving housing context and changing community objectives. Below is an example goal and policies involving affordable housing.

The city's Affordable Housing Task Force developed an initial draft set of policies which were refined by staff and consultants consistent with the plan and document, community engagement process and planning commission and city council's review. While most of the policies are advisory in nature, they provide enough detail to guide future decisionmaking. The column of strategies on the right provides useful details that don't fit in the policy format. These policies later proved useful in the subsequent land use code update and other affordable housing actions.

Goal H-3. Housing Affordability. Provide for a range of housing opportunities to address the needs of all economic segments of the community.

Policy H-3.1. Encourage preservation, maintenance, and improvements to existing affordable housing.

Policy H-3.2. Develop meaningful, measurable goals and strategies that promote the development of affordable workforce housing to meet local needs and monitor progress toward meeting those goals.

Policy H-3.3. Support non-profit agencies and public/private partnerships to preserve or develop additional housing for very low, low and moderate income households.

Policy H-3.4. Support both rental and ownership forms of affordable housing in a variety of types and sizes.

Policy H-3.5. Locate affordable housing throughout the city and especially in areas with good access to transit, employment, education, and shopping.

Policy H-3.6. Consider a housing levy to provide ongoing funding for affordable housing.

Policy H-3.7. Consider developing an inclusionary zoning program as a means of increasing the City's affordable housing supply.

Policy H-3.8. Require that affordable housing achieved through public incentives or assistance remains affordable for the longest possible term.

Policy H-3.9. Evaluate land owned by the City and other public entities for use for affordable housing utilizing a community land trust,-or similar, -type model.

Possible Workforce & Affordable Housing Strategies:

Incentive zoning. Development Incentives such as increased height or floor area ratio, could be tied to the provision of affordable housing or payment of a fee-in-lieu to an affordable housing fund.

Inclusionary zoning. Requires that a given share of new construction is set aside to be affordable to low to moderate income households.

Multi-family Tax Exemption (MFTE) Program. Washington state law authorizes this program, which offers a limited 12-year tax exemption from ad valorem property taxation if 20% of the housing is affordable.

Fee reduction or waivers. Costs associated with the development process, such as impact fees and building permit fees, can be reduced or eliminated to encourage selected types of development.

Source: City of Anacortes, 2016

In some cases, housing goals may still be valid, yet new policies are needed as new strategies to address housing needs are identified. For example, some policy support may be needed to authorize the community to adopt tax incentive programs, inclusionary zoning or other programs. [WAC 365-196-410](#) emphasizes that goals and policies serve as a guide to the creation and adoption of development regulations and may also be used to guide decisionmaking in the permitting process. See [RCW 36.70A.120](#) and [WAC 365-196-800](#) for requirements and guidance on consistency between the plan, regulations and capital budget.

What Related Policy Changes May Be Needed in Other Comprehensive Plan Elements?

Changes to housing element policies may require policy changes in other related elements of the comprehensive plan, and vice versa.

The community's land use element sets the future land use designations and growth targets and is a key element to consider in tandem with the housing element. Housing growth is also supported by, and should be consistent with, capital facilities, utilities and transportation elements. The housing needs identified by an HNA may require another look at other elements in the comprehensive plan. Some common scenarios could include:

- **Higher density land use designations and corresponding transportation and/or capital facilities investments:** Where the HNA and housing policy evaluation show greater housing affordability is required, the land use element may need to be reconsidered to add higher density designations, particularly in places of opportunity. Consequently, this higher density designation change may require improvements to transportation systems, water, sewer or stormwater infrastructure.
- **Smaller dwelling units and opportunity for walkable districts with amenities:** Compact development with greater numbers of smaller housing units could increase demand for services and amenities. In many areas, amenities and an improved design context may be needed to attract new housing investments. Such amenities could include strategic streetscape improvements and sidewalks along with updated standards to accommodate more intensive development patterns. More people brings demand for more services, such as coffee shops, restaurants, grocery stores and daycares and therefore the potential need to adjust zoning for neighborhood centers.
- **Need for more public open space and connectivity:** As private open space gets smaller with compact development, access to public open space such as parks, trails or complete sidewalks becomes more important to support housing development. Amendments to the parks and recreation plan and transportation improvement plan could focus on providing high quality, but potentially smaller amenities in proximity to higher intensity neighborhoods. Such changes could support multiple goals and policies across several elements including reducing sprawl, reducing greenhouse gas emissions, increasing walkability and supporting active living.
- **Balancing jobs with housing:** Some communities may wish to seek a greater balance of jobs and housing for more complete communities where people can live and work in the same area. This proximity improves work-life balance, reduces greenhouse gas emissions, and improves overall quality of life. This may require stronger policies to support new businesses and appropriately zoned land. If the economic development strategy will attract more employers and new jobs, it should also consider housing for those new workers and their prospective incomes.

See [Exhibit 32](#) illustrating how the housing policy framework is integrated in multiple elements of a comprehensive plan, a consideration when setting up a policy review.

Exhibit 32. Example of Housing Policy Framework Integrated in Multiple Comprehensive Plan Elements – Jefferson County



Note: *In 2020, the state of Washington's capital budget included funding for design and engineering of the Port Hadlock sewer project.
Source: Jefferson County, 2018

Additional Housing Policy Issues

Beyond those factors noted above, below are some additional considerations in updating your housing goals and policies:

- Address housing design and compatibility.** As many communities have run out of large vacant lands to develop and now require increases in density in existing neighborhoods to support growth, policies that emphasize compatible design have become more important. Such policies should provide guidance on the types of lot and building design provisions that should be addressed in implementing zoning codes and design standards or guidelines. See [Exhibit 33](#) for sample policies promoting compatible infill development, and see [Exhibit 34](#) and [Exhibit 35](#) for relevant housing design policies in Kirkland and Walla Walla. While compatibility is important, design policies can add complexity and expense to housing development. Your community may wish to balance these objectives.

- **Address special needs housing.** Every community contains its own mix of special needs housing issues (e.g., senior housing, farmworkers, homelessness, and adults with disabilities). With aging populations and increasing economic pressures, addressing these needs requires increasingly proactive efforts. Policies may include barrier free design to allow people of various abilities to use the housing stock. See [Exhibit 36](#) for Bellingham's special needs housing goal and policies.
- **Address inequality and equity.** Chapter 1 of the HAP Guidebook (see section "How is Housing Policy Related to Race and Inequality") provides useful context on historic practices that have contributed to patterns of inequality in many communities. Policies that help expand the supply and diversity of housing are the primary ways that communities can address existing inequalities. Policies promoting diverse housing options in areas with access to transportation, parks, schools and amenities are also particularly important. Tacoma's Goal H-2 from One Tacoma Housing Element in [Exhibit 37](#) illustrates policies focusing on equity issues.
- **Address displacement.** For those many Washington communities facing rapidly increasing rental and for-sale housing prices, displacement is a very significant issue. Chapter 5 of the HAP Guidebook examines a great variety of strategies for minimizing and mitigating displacement. A list of these displacement strategies is also included in [Appendix B: Housing Strategies](#). Policies H-2.5 and H-2.6 illustrated in Tacoma's housing element in [Exhibit 37](#) address displacement.
- **Monitor housing supply and affordability.** Policies for monitoring progress towards achieving goals and growth targets can be an important first step towards realizing your community's vision. See [Chapter 8. Implementing and Monitoring Your Housing Element](#) for more details on monitoring.
- **Plan for housing away from natural hazards.** Hazards could include wild fire, floods or steep slopes.
- **Encourage sustainable housing models.** Consider solar access, passive solar design, energy efficiency and net zero buildings.

EXAMPLE POLICIES IN APPENDIX D

- Preservation (*Maintenance and Code Enforcement*)
- Variety of Housing Types (*ADUs, Tiny Homes and Manufactured Housing, Infill Development and Density Near Places of Opportunity*)
- Home Ownership
- Accommodate Growth
- Housing Location and Transportation and Land Use (*Location of Affordable Housing, Jobs/Housing Balance*)
- Infrastructure (*College Housing, Rural and Farmworker Housing*)
- Affordable or Subsidized Housing (*Incentives or Requirements, Funding or Financing, Prevent Barriers*)
- Vulnerable Populations and Homelessness (*Special Needs Housing, Homeless Focus, Aging Adults Focus, Surplus Land and Non-Profit Housing*)
- Equity, Displacement and Integration
- Regional Coordination and Fair Share
- Design and Development Standards (*Sustainable Housing, Historic Preservation*)
- Tracking and Monitoring

[Appendix D: Housing Element Policy Examples](#) includes additional housing policy examples from jurisdictions in Washington. The National American Planning Association (APA) Housing Policy Guide (2019) also includes policies for local governments to consider.³⁷

³⁷ <https://www.planning.org/publications/document/9178529/>

Exhibit 33. Sample Policy Language Promoting Compatible Infill Development

Enhanced design standards can be important to communities accepting more density in established neighborhoods. Below are sample policies that provide guidance for new or refined design standards associated with small lot infill and multifamily development. While these do not reference missing middle housing types, the same design components largely will apply.

Policy: Adopt design standards for small lot and attached housing development to gracefully integrate these uses into existing neighborhoods in ways that maintain general neighborhood scale and character. Key concepts to consider in the design standards:

- Encourage a covered entry facing the street.
- Minimize the impacts of garages and driveways on the streetscape.
- Provide usable open space.
- Set a maximum floor area ratio to better ensure that homes are proportional to lot sizes.
- Require a minimum amount of façade transparency to promote more “eyes on the street” for safety and to create a welcoming streetscape.

Policy: Adopt design standards for new multifamily development to promote neighborhood compatibility, enhance the livability of new housing, and enhance the character of residential and mixed-use areas.

- Emphasize pedestrian oriented building frontages.
- Emphasize façade articulation consistent with neighborhood scale.
- Integrate high quality durable building materials and human scaled detailing.
- Provide for usable open space for residents.
- Provide compatible site edges and sensitive service area design.
- Provide for vehicular access and storage while minimizing visual and safety impacts of vehicles.
- Integrate landscaping elements to soften building elevations, enhance neighborhood compatibility and improve the setting for residents.

Exhibit 34. Example Design Standard Policy in Kirkland's Comprehensive Plan

Kirkland's Policy H-2.4 focuses on integrating greater housing options in single family areas and emphasizes the importance of site and building design provisions to best ensure neighborhood compatibility.

Policy H-2.4: Allow a broad range of housing and site planning approaches in single-family areas to increase housing supply and choice, to reduce cost, and to ensure design quality and neighborhood compatibility.

Clustering and innovative housing types may include cottages, compact single-family, zero lot line, clustered and common wall housing. These development styles can allow for more environmentally sensitive site planning by concentrating development on the most buildable portion of a site while preserving natural drainage, vegetation, and other natural features. Similarly, allowing zero lot line or other design innovations in these areas can further help to lower land and development costs.

Innovative housing types also may be appropriate on sites in single-family neighborhoods that do not have environmental constraints. The demographics of our population are changing, with the average number of people living in each housing unit decreasing and the average age increasing. Cottage, compact single-family and common-wall housing can provide more housing on the same land area, in smaller structures that better match the needs of our population. In addition, housing affordability can be improved through reduced construction costs resulting from smaller or common-wall development.

In all cases, design standards are important to ensure that new development is integrated sensitively with its neighbors. Greater attention to building and site design, such as building bulk, roofline variation, garage and parking location, and landscaped buffers can enhance aesthetic appeal and neighborhood compatibility.

Source: City of Kirkland, 2015

Exhibit 35. Example Design Policies in Walla Walla's Comprehensive Plan



Duplex at the Corner of South 2nd Avenue and Howard Street (top) and Single Family Home with Accessory Dwelling Unit on East Chestnut Street (bottom)

HOUSING GOAL 2 Goal H-2: Attractive and functional neighborhoods are welcoming to all types of households.

H Policy 2.1 Integrate housing for lower and moderate income households and those with special needs into a variety of geographical locations throughout the city.

H Policy 2.2 Develop minimum property maintenance standards to ensure the safety and suitability of existing housing stock.

H Policy 2.3 Develop design guidelines to ensure that all new housing, including that for lower and middle income owners and renters, adheres to good standards of planning, design, and construction.

H Policy 2.4 Enhance the character of neighborhoods through superior design, responsible stewardship, the application of sustainability principles, and historic preservation.

H Policy 2.5 Plan for energy efficient housing that is designed to maximize use of renewable resources such as solar and wind power.

Source: City of Walla Walla, <https://www.wallawallawa.gov/home/showdocument?id=854>

Exhibit 36. Example Special Needs Housing in Bellingham's 2016 Comprehensive Plan

Special Housing Needs and Homelessness (*excerpt from Bellingham's Comprehensive Plan 2016*)

Special needs citizens include people who require some assistance in their day-to-day living such as the mentally ill, people with developmental or physical disabilities, victims of domestic violence, at-risk youth, veterans and the elderly. Housing for special needs citizens may or may not incorporate supportive services, and may be permanent or transitional. Examples include adult family homes, assisted living facilities and group homes for people with developmental disabilities.

Due to rising housing costs and general unavailability of affordable housing for low-income households, homelessness is recognized as the most basic and extreme housing problem. According to the 2015 point-in-time count, there are least 651 homeless persons (a person may be part of a family household or an unaccompanied individual) and 449 homeless households (a household may include one or more persons) in Whatcom County. Twenty-six percent of all homeless households are considered chronically homeless. According to the 2015 Annual Report by the Whatcom County Coalition to End Homelessness, point-in-time counts generally underestimate the number of people who are homeless.

GOAL H-4: Support housing options for special needs populations.

- Policy H-46: Work with agencies, private developers and nonprofit organizations to locate housing to serve Bellingham's special needs populations, particularly those with challenges related to age, health or disability.
- Policy H-47: Allow housing opportunities for special needs populations in appropriate locations throughout the community.
- Policy H-48: Encourage and consider incentives for the dedication of a portion of housing in new projects to special needs housing.
- Policy H-49: Support implementation of the Whatcom County Plan to End Homelessness.
- Policy H-50: Continue to encourage and support the development of emergency, transitional and permanent supportive housing with appropriate on-site services for people with special needs and the homeless throughout the City and county. Moving people into permanent housing as quickly as possible should be a priority.
- Policy H-51: Maintain an inventory and expand the city's supply of interim housing for target populations.
- Policy H-52: Foster and support partnerships that have proven to be successful in reducing homelessness, preventing homelessness and assisting the chronically homeless with needed care.
- Policy H-53: Support a range of housing types for retirees and seniors, including townhomes, condominiums and assisted living and independent living communities near daily needs and transit.
- Policy H-54: Support ways for older adults and people with disabilities to remain in their homes and the community as their housing needs change by encouraging universal design and home retrofits for lifetime use.

Source: City of Bellingham, [Bellingham Comprehensive Plan 2016](#), updated 2019

Exhibit 37. Example of Anti-Displacement Policies in One Tacoma Comprehensive Plan

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GOAL H-2 Ensure equitable access to housing, making a special effort to remove disparities in housing access for people of color, low-income households, diverse household types, older adults, and households that include people with disabilities.

Policy H-2.1 Foster inclusive communities, overcome disparities in access to community assets, and enhance housing choice for people in protected classes throughout the city by coordinating plans and investments with fair housing policies.

Policy H-2.2 Support barrier-free access for all housing consistent with the Americans for Disabilities Act (ADA). Consider additional actions to increase access such as implementation of visitability and universal design features.

Policy H-2.3 Coordinate plans and investments with programs that prevent avoidable, involuntary evictions and foreclosures.

Policy H-2.4 Evaluate plans and investments and other legislative land use decisions to identify potential disparate impacts on housing choice and access for protected classes.

Policy H-2.5 Evaluate plans and investments for the potential to cause displacement in areas with concentrations of communities of color, low- and moderate-income households, and renters.

Policy H-2.6 When plans and investments are anticipated to create neighborhood change, pursue corrective actions to address involuntary displacement of under-served and under-represented people. Use public investments, incentives, and programs, and coordinate with nonprofit housing organizations, to mitigate the impacts of market pressures that cause involuntary displacement.

Policy H-2.7 Encourage a range of housing options and supportive environments to enable older adults to remain in their communities as their needs change.

Policy H-2.8 Help people stay in their homes through expanded tenant's protections, providing resources for households experiencing a crisis, increasing community organizing capacity, and other means.

Source: City of Tacoma, https://www.cityoftacoma.org/UserFiles/Servers/Server_6/File/cms/Planning/OneTacomaPlan/1-5%20Housing.pdf

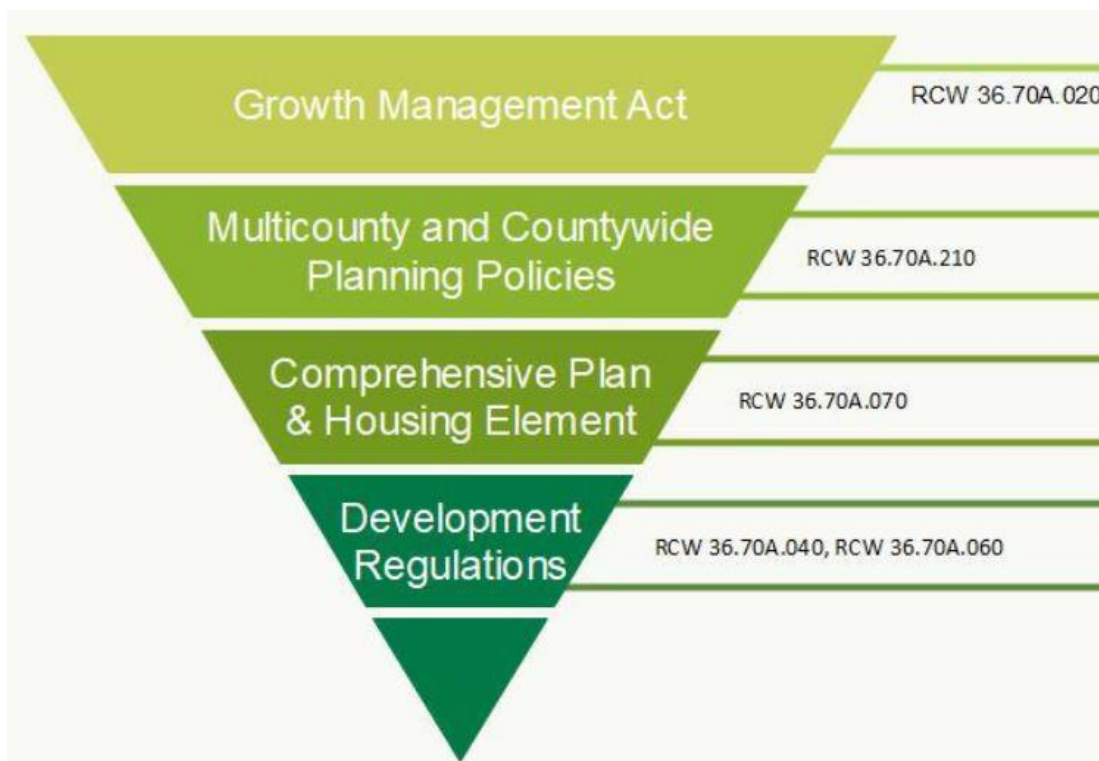
Evaluating your Goals and Policies

As you review existing goals and policies for a potential update, consider the following questions:

- Are all the goals and policies consistent with the state laws and GMA requirements?
- Are all the goals and policies consistent with countywide planning policies and multi-county planning policies (if applicable)?
- Do the goals and policies reflect the needs identified in the housing needs assessment?
- Are some policies no longer relevant, or do some need to be updated because community opinion has changed?
- Are there new concerns such as homelessness, equity or affordable housing in proximity to opportunity that should be addressed in policies?
- Are any of the policies inconsistent with each other or other parts of the plan?
- Can some policies be adjusted to be stronger, increasing the strength of the words?
- Are policies clear about how they would be implemented in your development regulations, permitting processes, development fee structures and other programs?
- How will you measure success? Are there specific goals or policies that could be measured, such as the number of new accessory dwelling units, or the size of new housing units?

Final Check on Policies

As you finalize your policies, take a minute to make sure they are consistent with countywide and multi-county planning policies and the GMA goal. Will their implementation development regulations and other tools result in housing that will meet these goals?



Source: BERK, 2020

Chapter 6. Identifying Strategies to Implement Your Policies

Implementing goals and policies is most effective if you select realistic strategies that help you move toward your goals. Housing strategies are individual actions, such as regulatory policies, tools or programs, that jurisdictions can take to encourage and facilitate the kinds of housing production called for in policies and achieve housing element goals. Strategies are strongest when they are included in the policies themselves, or they can be listed in comments associated with policies or selected later through local implementation actions.

Commerce's 2020 [Guidance for Developing a Housing Action Plan](#)³⁸ (referred to as "HAP Guidance" herein) provides detailed recommendations for identifying and selecting strategies that have the greatest potential to address housing needs given your community's unique characteristics and market conditions. It also describes a wide range of possible strategies that jurisdictions can use to achieve housing supply, diversity and affordability goals, including case studies and tips for most effective implementation.

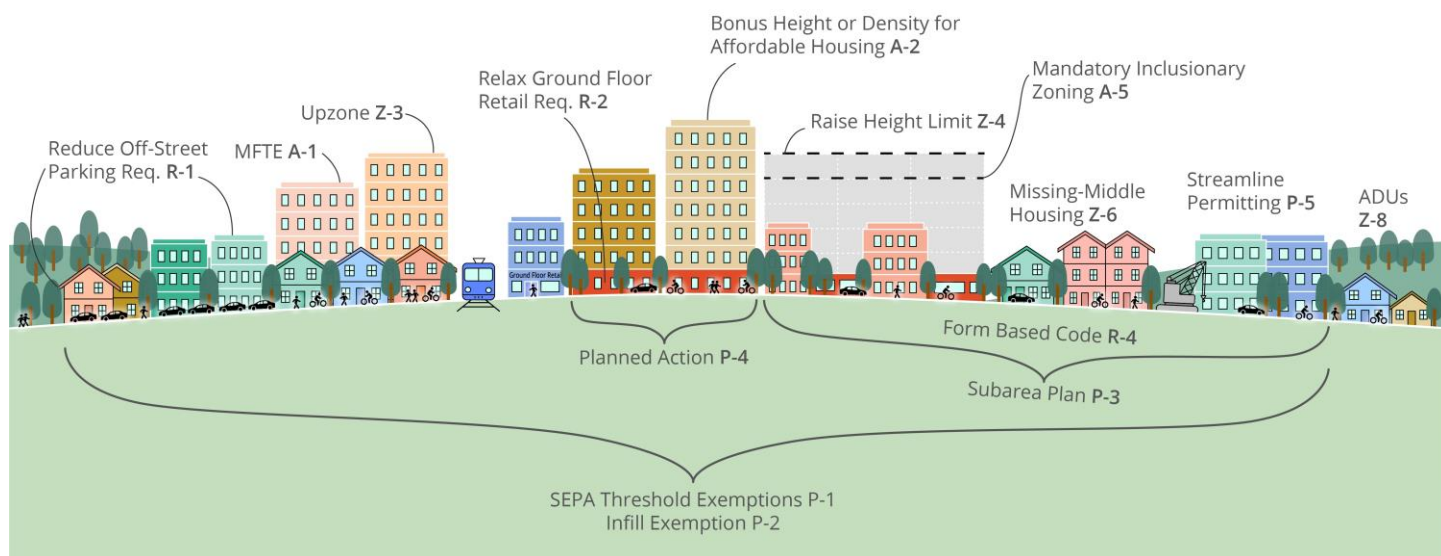
In 2019, funding was provided for cities to develop housing action plans as described in RCW 36.70A.600(2). Cities that received grant funding were required to identify strategies to encourage housing development that meets housing needs, as well as a plan for implementing those strategies. This chapter adapts and summarizes key recommendations in the HAP Guidance.

Strategies Should Work Together

A key takeaway from the HAP Guidance is that no single housing strategy is a complete solution. Housing strategies do not generally work in isolation. Multiple strategies can work together to shape opportunities for development and encourage the kinds of housing production that are in greatest need. Due to the unique size, demographic, and physical and political context of each community, the most effective combination of strategies will also be unique. [Exhibit 38](#) shows examples of how multiple housing strategies can encourage the kinds of development needed to reach a community's housing goals.

³⁸ <https://deptofcommerce.box.com/shared/static/pophc16jetggsctctmnbjomm0qa7tpu8.pdf>

Exhibit 38. A Mix of Interrelated Housing Strategies



Note: The letters and numbers next to each strategy correspond to Commerce's [Guidance for Developing a Housing Action Plan](#) (2020)

Source: MAKERS, 2020

Types of Housing Strategies

The HAP Guidance includes six categories of housing strategies. A full list of strategies can be found in [Appendix B: Housing Strategies](#). See the [HAP Guidance report](#) for detailed descriptions of individual strategies, including tips for prioritization and effective implementation.

1. **Revising Zoning Standards:** Strategies for regulating building heights, density levels and permitted uses.
2. **Additional Regulatory Strategies:** These include adjusting other regulatory standards such as parking requirements, setbacks and design standards that can affect the feasibility of projects.
3. **Process Improvements:** Strategies to provide for a smoother, faster and/or more predictable permitting process for developers seeking to build housing that is consistent with jurisdictional goals. Many developers maintain that providing for predictability is the most important thing jurisdictions can do to encourage housing production. Therefore, jurisdictions should give particular attention to the value provided by discretionary processes such as design review and consider whether there are other ways to achieve similar goals.
4. **Housing Incentives:** Strategies to encourage and support multifamily and affordable housing development, particularly income-restricted affordable housing, such as fee waivers, multifamily tax exemptions or inclusionary zoning.
5. **Funding Options for Affordable Housing Development:** These are options for directly funding or subsidizing affordable housing production, including grants, loans and new revenue generation.
6. **Other Strategies:** Such as strategic infrastructure investments or programs to support homeowners with ADU financing, design, permitting and/or construction.

Many strategies are most effective when implemented with the support of partners. Examples might include engaging a housing authority or other agency to help conduct annual affordability checks to ensure units with affordability covenants are still affordable.

Identifying Strategies for Implementing Housing Policies

This section describes common themes and needs identified in housing policies as well as considerations for selecting the kinds of housing strategies that can be most effective for implementation. [Exhibit 39](#) provides a simple example of how a single housing policy may call for more than one strategy for successful implementation.

Exhibit 39. Example of Linking Housing Policies to Implementation Strategies

Housing Policy: Promote more opportunities for home ownership through single-family detached and semi-attached housing, fee-simple cottages and townhouses, and condominium apartments.	
Strategy 1. Reduce minimum lot sizes in residential zones.	
Strategy 2. Allow for additional housing types in residential zones, including fee-simple cottages and townhouses.	

Increase Housing Supply

Each community has its own unique target, goal and/or projection for accommodating new housing units over its comprehensive planning horizon. Some housing strategies will have a greater impact than others in helping to meet those targets. In addition to strategies that increase capacity, such as increasing density limits, you should consider strategies to address other barriers that prevent developers from taking advantage of available housing capacity, such as reducing parking requirements or process improvements that help increase predictability for developers.

Housing Diversity

Housing diversity refers primarily to the mix of housing types and unit sizes that meet the unique demographic needs of each community. In many communities, the housing supply is dominated by single-family homes, or by single-family and apartment homes only. For example, if the housing needs assessment shows a mismatch between small household size and large housing units, an increase in housing diversity can help provide housing that more closely matches household need. Strategies that can effectively promote the development of missing middle housing types are particularly important for achieving housing diversity. These may include regulatory strategies to allow for missing middle housing types and development standards that support their construction.

Affordable Homeownership

In many communities, home sales prices are rising faster than local incomes. This can put homeownership out of reach for lower-, moderate- and even middle-income households, denying the stability and wealth-building opportunities that come with it. If your housing needs assessment shows a significant cost burden, particularly at the lower end of the spectrum, strategies to encourage the development of more affordable types of for-sale housing may be needed. These places can benefit from strategies to promote the production of a greater diversity of ownership housing types that can be constructed at lower cost per unit than traditional single-family homes. This may include adding flexibility to allow smaller cottage-style single-family homes, attached houses like townhomes or condominiums in residential zones. Communities can also address regulations that increase the cost of housing construction, such as addressing off-street parking requirements and fee waivers for affordable housing. Finally, many communities also partner with organizations like Habitat for Humanity or community land trusts to support subsidized ownership housing opportunities for qualified residents with low-incomes.

Middle-Income Rental Housing

Middle-income rental housing, also referred to as workforce housing, typically refers to housing that is affordable to people who are fully employed but whose incomes may be lower than those of many area residents. These populations with middle-incomes work in the community as retail or food service workers, teachers, firefighters, police, nurses or office support staff. Many of these workers either cannot afford or are not ready for homeownership. Areas with a lack of rental housing options affordable to households with moderate- and middle-incomes can benefit from strategies focused on increasing the quantity or density of apartments, particularly in areas with access to transit, services and amenities.

Many of the same strategies used to increase multifamily housing supply can be relevant to middle-income rental housing (see "Increase Housing Supply" above). In some communities, additional incentives are required to encourage developers to provide new units at price-points affordable to households with moderate-incomes, such as multifamily tax exemption (MFTE) and inclusionary zoning.

Senior Housing

Seniors have special housing needs due to increasing mobility challenges and a greater risk of disability and chronic diseases. Due to demographic trends, many communities in Washington are expected to see a rapid increase in the number of elderly residents in the coming decade. While some seniors will choose to "age in place" (stay in their current residence), others may wish to downsize to smaller units within the same community. Many others will choose to live with younger family members or will require specialized housing solutions, such as senior apartments (independent living), assisted living facilities, memory care facilities and nursing homes.

In many communities, there is a need for additional market-rate senior housing facilities, as well as subsidized facilities for seniors with little or no savings and fixed incomes. Those seeking to "age in place" will eventually require additional support services such as home modification, transportation, recreation and socialization, yard care, care management, and/or counseling. These kinds of services can also be considered as part of a holistic senior housing strategy to respond to the policies established earlier in the process.

Strategies to encourage the production of senior housing solutions include special incentives or alternative development standards that reduce the cost of developing senior housing, such as fee waivers and senior bonus densities. Regulations that permit accessory dwelling units can also allow seniors to live close to family or allow a home health aide to live near a senior in the primary unit.

Very Low-Income Housing

For households with incomes below 50% of median family income, new housing cannot be provided at an affordable price-point without public subsidy. As a result, residents with very low-incomes often struggle with severe cost-burden and even homelessness. Cities and counties can support and encourage the development of income-restricted housing through funding contributions, donation of surplus public land, reducing costs to build new affordable housing projects and incentives to include affordable units in new market-rate developments. Most often, it takes a combination of coordinated strategies to most effectively support affordable housing development, as well as partnerships with local housing authorities, nonprofits or faith-based institutions. Some strategies for this housing need include:

- Allow for the development of low-cost “tiny homes,” including “villages” with several homes and common space.³⁹
- Allow for development of manufactured home communities, particularly cooperatively owned.
- Donate surplus public land for affordable housing development or reuse underutilized land.
- Seek new funding options to support affordable housing development.
- Permit fee waivers for affordable housing projects.
- Reduce parking requirements for affordable housing projects.
- Allow temporary emergency housing.

³⁹ A new Washington state law, RCW 35.21.684, allows for tiny homes in manufactured home parks, and allows local jurisdictions more flexibility to authorize them in other zones. Additional information about tiny home villages can be found in Alexander, Lisa T., Texas A&M University School of Law, "Community in Property: Lessons from Tiny Homes Villages," (2019), <https://scholarship.law.tamu.edu/cgi/viewcontent.cgi?article=2332&context=facscholar>.

Chapter 7. Adopting Your Housing Element

A comprehensive plan may only be amended once per year, but must be amended periodically according to the schedule in RCW 36.70A.130.⁴⁰ The periodic review or annual amendment process is navigated frequently by planners, and each agency will have its own approach to ensure a transparent and predictable review process. Routine amendments may be straightforward. Other amendments may garner more public interest. In any case, below are tips for managing the adoption process to a successful conclusion.

- **Plan for adoption at the beginning:** Preparing for adoption should begin when establishing the project plan and schedule and public participation plan at the start of the project. Establish a critical path, and work backward from desired legislative action dates with the city council. Allow for some cushion in case more time is needed to respond to public and decisionmaker comments. Ensure that any administrative appeal periods for environmental review are accounted for as well.
- **Engage decisionmakers along the way:** Addressing critical housing needs and defining strategic actions can inspire enthusiasm and concern from a range of stakeholders, including elected and appointed officials. Engaging with decisionmakers early and continuously will create a smoother path for the adoption process.
- **Simplify the process:** Integrating the requirements of environmental review and planning can reduce paperwork and align public comment opportunities, which creates a streamlined schedule and a more accessible process for members of the public. See discussion of SEPA/GMA integration below in the "[Adoption Process](#)" section below.

Public Engagement

When community members and stakeholders help shape a housing element's policies, it reflects their interests and they become its advocates. Public engagement is an important part of gathering and verifying information, highlighting and addressing inequities, and building support for an implementable plan. A well-rounded public engagement approach includes developing a public participation program as one of the first steps, engaging a wide spectrum of the public and stakeholders, particularly people having trouble finding housing that meets their needs. It is important to reflect this public input in the housing element updates so it can be included in the final decisionmaking process.

This section summarizes a more complete description of public engagement recommendations in the [Guidance for Developing a Housing Action Plan](#). Highlights are provided below.

TIPS FOR ADOPTION SUCCESS

Inform and empower participants using simple, legible graphics and narrative allowing them to critically assess the housing system.

Go on tours, either real or virtual to provide a more concrete and less threatening image of possible future outcomes.

Test preferred concepts such as with a pro-forma analysis.

Bring in experts to answer questions.

Be clear about what policy options will mean to people.

Provide strong visual examples.

Deal with controversy early, ensure diverse representation on committees, avoid jargon and use the planning process to cultivate advocates.

⁴⁰ See "Keeping your Comprehensive Plan and Development Regulations Current" at <https://www.commerce.wa.gov/serving-communities/growth-management/periodic-update/>.

Develop a Public Participation Program

RCW 36.70A.140 states: "Each county and city that is required or chooses to plan under RCW 36.70A.040 shall establish and broadly disseminate to the public a public participation program identifying procedures providing for early and continuous public participation in the development and amendment of comprehensive land use plans and development regulations implementing such plans. The procedures shall provide for broad dissemination of proposals and alternatives, opportunity for written comments, public meetings after effective notice, provision for open discussion, communication programs, information services, and consideration of and response to public comments."

Though this statute refers to the whole comprehensive plan, applying this statute is also required when a single element is being revised. Regardless of whether you are updating just your housing element or your entire comprehensive plan, early and continuous public involvement is essential.

Though the public participation plan is created early to set the direction, be ready to revisit it throughout the process and update as needed to fill in emerging gaps. An engagement plan should identify:

- Public engagement goals
- Audience(s) for engagement, including community members, stakeholders, staff, boards, commissions, council, any advisory committees and other parties involved (e.g., state agencies)
- Appropriate engagement activities, such as open houses, surveys, web-interface community meetings and web pages
- Draft engagement schedule with re-evaluation opportunity(ies)
- Media contacts and timelines for communication about the project

Exhibit 40. Spectrum of Public Participation

	INFORM	CONSULT	INVOLVE	COLLABORATE	EMPOWER
					
GOAL	To provide balanced and objective information in a timely manner.	To obtain feedback on analysis, issues, alternatives and decisions.	To work with the public to make sure that concerns and aspirations are considered and understood.	To partner with the public in each aspect of the decision-making.	To place final decision-making in the hands of the public.
PROMISE	"We will keep you informed"	"We will listen to and acknowledge your concerns."	"We will work with you to ensure your concerns and aspirations are directly reflected in the decisions made."	"We will look to you for advice and innovation and incorporate this in decisions as much as possible."	"We will implement what you decide."

Source: International Association for Public Participation, www.iap2.org

A useful tool for considering public engagement plan goals and types of engagement is the International Association for Public Participation's (IAP2) Spectrum of Public Participation; see [Exhibit 40](#) above. All stages on the spectrum are valuable. Depending on whether you are educating about options ("informing"), extracting information about community preferences ("consulting") or problem-solving together ("collaborating"), you will

choose your venues and design your methods and activities for the right level of communication. Regardless of where you are on the spectrum, listening to community members with an open mind is an important skill.

Identify Audiences

Though housing policy affects all members of a community, focusing your engagement efforts helps set a timely, budget-efficient and equitable process. The Stakeholder Prioritization Chart ([Exhibit 41](#)) offers a way to narrow your efforts by identifying important stakeholders and defining an approach to their engagement.

Shifting decisionmaking power toward traditionally at-risk groups (the “Prioritize” quadrant) and truly listening to their needs and interests is fundamental to creating socially equitable housing policies. These steps ensure that their needs are met and help the project team to understand potential unintended consequences of housing policies.

At the same time, powerful influencers (the “Collaborate” quadrant) must also be heavily involved to ensure the policies are feasible and implementable. This means higher levels of engagement and true collaboration are important with these two groups. Those in the “Monitor for Change” and “Leverage” quadrants are important for verifying data and building advocates, so informing and consulting are appropriate levels of engagement with these groups.

Prioritize At-Risk Communities

The people most impacted by housing policies — the **at-risk communities** in the stakeholder prioritization chart — often have the most challenges to participating in traditional meetings and outreach methods. For that reason, extra effort should be made to identify populations and stakeholders who could be most impacted by housing policies and potential barriers to participation.

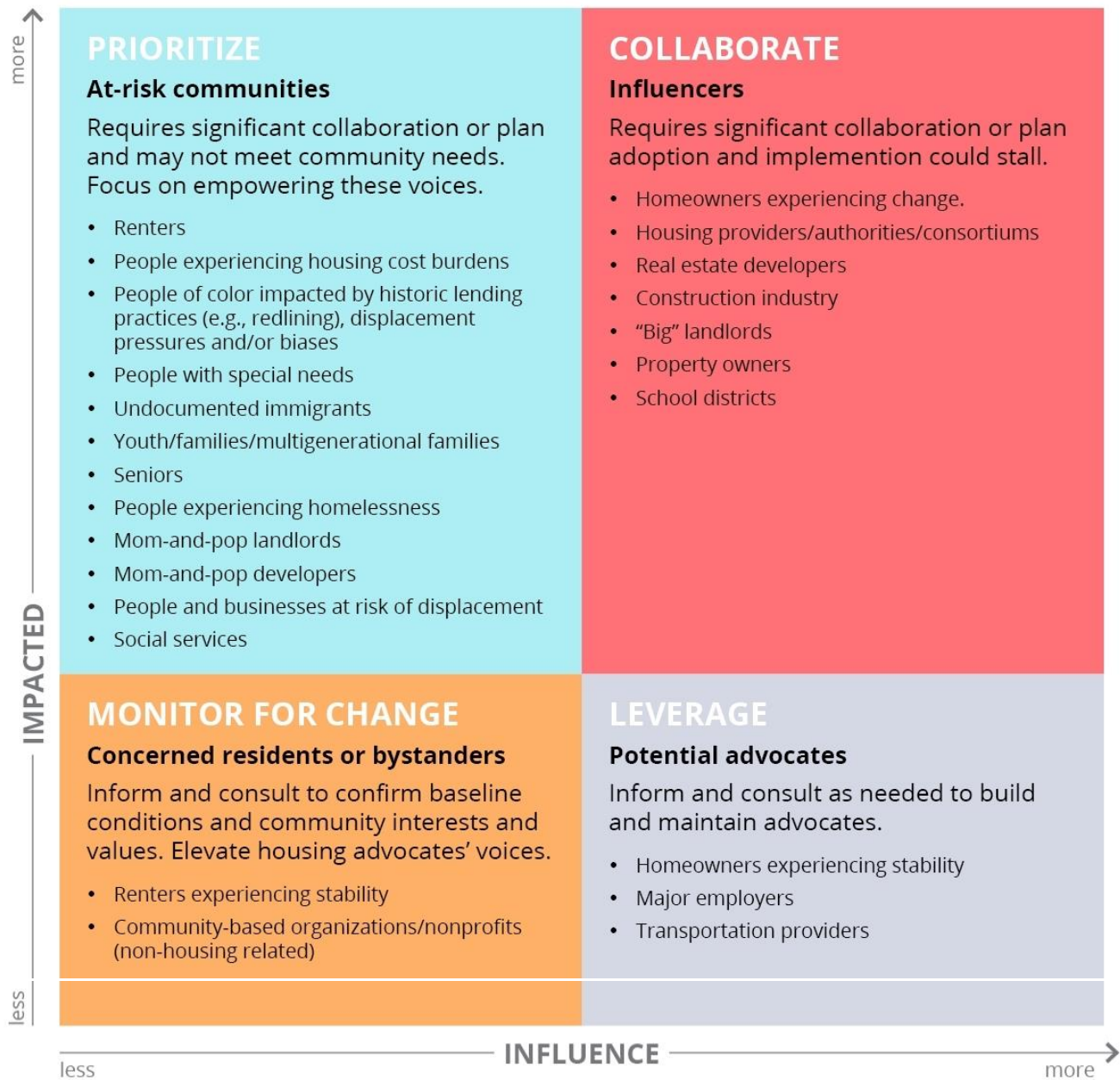
Collaboration with people who have historically been left out can lead to more creative and productive problem-solving. Good practices and goals include:

- Identify communities at risk of displacement and other impacts
- Build capacity of disadvantaged communities to meaningfully participate and affect decisions — i.e., prioritize engagement with at-risk communities
- Identify potential unintended consequences of proposed strategies (e.g., displacement of vulnerable populations and/or affordable community spaces with redevelopment, construction impacts to local businesses, etc.)
- Jointly find housing solutions and strategies to prevent and/or mitigate negative impacts

Ways to engage at-risk communities include:

- **Value Participants’ Time and Expertise:** Pay participants for their time and expertise, especially when they come from communities that have been systemically underserved. Compensation can range from stipends (e.g., \$50 per meeting) for participating in a stakeholder work group, consultant funding for engaging their community, raffles and gift cards for attending an event, to providing food at events.
- **Avoid Engagement Fatigue:** Some community leaders and organizations feel they have been asked for their opinion in numerous processes, but often are not seeing how their input has been used or results from their efforts. This is leading to “engagement fatigue.” The best way to prevent future engagement fatigue is to show that participants’ efforts were fruitful. Throughout the process, show how participants’ needs, ideas, preferences and solutions are being incorporated.

Exhibit 41. Stakeholder Prioritization Chart



Source: MAKERS, 2020, adapted from multiple versions, including Kapwa Consulting's emphasizing a social equity lens and the original "power-interest" matrix (Mendelow, 1991).⁴¹

- **Make Engagement Methods Accessible:** Consider hiring community liaisons, providing translations, offering childcare, providing food, etc.
- **Focus Efforts:** When developing your plan, consider and plan for the various barriers to participation. Not every barrier can be mitigated, and regardless of how welcoming events are, people have competing demands on their time. To prioritize your efforts, consider what will help you meet these basic needs:

⁴¹ Mendelow, A. "'Stakeholder Mapping', Proceedings of the 2nd International Conference on Information Systems." Cambridge, MA 5, no. 2 (1991): 61.

gather the information needed to understand the full housing picture in your community, build advocates and empower at-risk communities.

Engage Stakeholders

How much you engage people will vary by audience and point in the process, as well as the nature and extent of the housing element update or amendment process. The size and type of community, complexity of housing issues and strategies under consideration will also factor into your engagement plan.

Think strategically about who will be involved, which methods to use and at what times. Consider the most basic engagement needs — to gather information, build plan “authors”/advocates and empower underserved communities. Also consider your more specific desired outcomes to match stakeholders/community members with appropriate engagement activities, timing and level of effort.

The methods listed below are ordered roughly from broadest to most in-depth and focused. The engagement plan should include a mix of engagement methods depending on the engagement goals for different audiences and phases of the project.

- **Online Presence:** An online presence is useful for making the process accessible to people not typically engaged in government activities, pointing participants to surveys and events, providing project updates and inviting people to join a project listserv. At its simplest, a project website provides a clearinghouse for the housing element's goals, schedule and draft materials.
- **Focus Groups and Interviews:** One-to-one or small-group meetings with people who share a special knowledge base or identity can be a highly effective way of gathering information and identifying potential solutions.
- **Social Media:** Interactive platforms and/or social media (e.g., Facebook, Nextdoor, Instagram, Twitter, Snapchat, WeChat, WhatsApp) go beyond a simple website to allow for online engagement.
- **Online Engagement Platforms:** Online engagement platforms like surveys and discussion forums can offer a broad and accessible opportunity to be involved.
- **Public Open House:** Open houses offer more flexibility in timing and time commitment than a workshop and consequently lower barriers to access. A secondary objective of the open house is to build up the project contact list for future events and announcements. A virtual option is to hold an “online open house,” which presents information about the project and can be combined with an online survey.
- **Public Workshop:** The most effective workshops tend to be planned for participant education, working through issues as a group and collecting input on the matters at hand.
- **Pop-up at Community Hotspot:** Pop-ups are like mini-open houses: staff set up at a popular public location — a grocery store, coffee shop or street corner — to share information with community members who may or may not have been aware the event would occur.
- **Piggyback on Public Events:** Similar to pop-ups, piggybacking integrates public engagement with the ongoing civic life of the community. A table and brief announcement at an event like a farmers market, street fair, outdoor movie or parade provides an excellent opportunity to engage with members of the public that might never choose to attend an open house or workshop.
- **Piggyback on Pre-existing Meeting/Community Conversations:** By attending a stakeholder group's own meeting (e.g., religious institution board/committee, chamber of commerce, homeowners' association, neighborhood council, business district advocate group, neighborhood potluck, community center event or interest group happy hour), you respect the participants' time, avoid engagement fatigue and meet them in their comfort zone.
- **Community Liaisons:** Community liaisons serve as a link between municipal government and hard-to-reach communities. They are especially valuable for reaching communities with language barriers and/or

hesitancy to trust public authorities. Liaisons advise on the best methods for gaining the community's insights.

Set Activities to a Timeline

To develop the schedule and select engagement activities, consider the sequencing of events relative to expected milestones. Sequencing considerations include:

Get started:

- Identify likely groups and individuals to include in your process.
- Conduct interviews with key stakeholders, decisionmakers and community liaisons to inform engagement strategies and expand the list of participants.
- Build awareness of the housing element process through broad outreach.
- Learn about key housing issues, e.g., verify the HNA through focused conversations with impacted and knowledgeable parties or reach out to developers to understand barriers to the development of the housing you need.

Identify issues and potential goals and policies:

- Engage broadly to build awareness about the project and learn from residents on how to best focus the discussion. Open houses, workshops, surveys, pop-ups and piggyback events, or their online counterparts, can be especially useful for these purposes.
- Build a deep knowledge base to identify and evaluate needs through interviews and focus groups with experts and community members that have specialized knowledge. Look for information about local housing markets, barriers to housing access, or impacts to specific populations.

Evaluate potential goals and policies with the public:

- As the goals and policies come into focus, hold events like charrettes or workshops to dive deep into the issues and potential outcomes and give community members ownership over the housing element.
- Continue dialogues with heavily impacted groups to workshop strategies and understand potential unintended consequences.

Set implementation plan/prioritize actions:

- Identify near-, medium- and long-term actions, and work with the public to prioritize them.

Throughout the process:

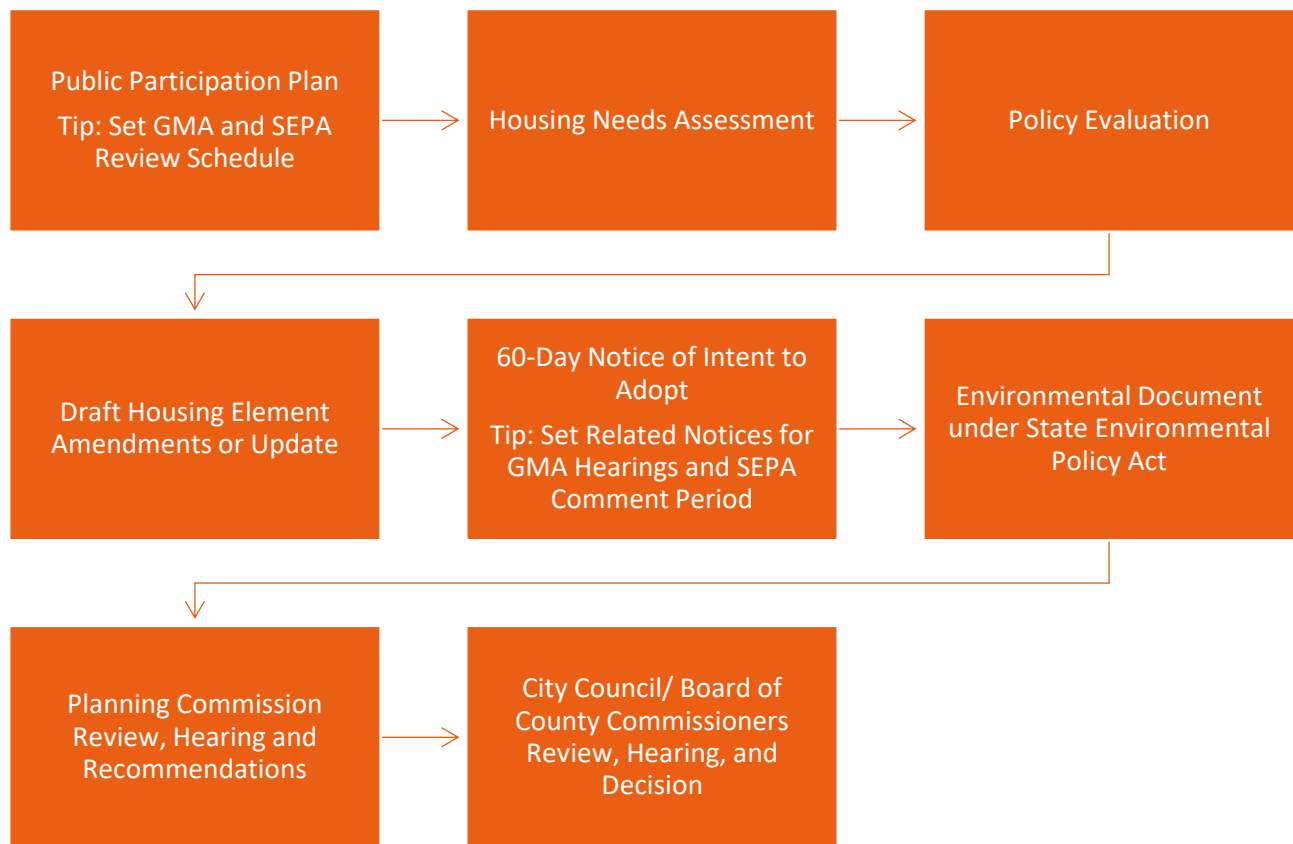
- Build in time to re-evaluate your engagement methods and fill in any information or advocacy gaps rising to the surface.
- Continue opportunistic piggybacking on pre-existing community meetings and popping up at events.
- Continue to provide information through websites.

Adoption Process

Opportunities for public comment and engagement with the public and stakeholders, as well as review and recommendations by the planning commission, ultimately culminate in a review and decision by the city council. Generally, there will have been opportunities for public engagement in reviewing the housing needs assessment and considering policies. The final draft of the housing element will require at least one public hearing prior to adoption ([RCW 36.70A.130\(1\)\(b\)](#)). The planning commission typically holds a hearing; the city council or board of county commissioners may also hold a hearing depending on whether there are substantial changes to planning commission recommendations and the nature of the local government's procedural regulations. Adoption of a comprehensive plan or single elements must be part of the annual comprehensive plan amendments or the periodic updates, and must be adopted by ordinance. See [Exhibit 42](#) for an example

adoption process. Two examples of adoption ordinances include [Anacortes' Ordinance 2982](#), adopting a complete update to the Comprehensive Plan in 2016, and [Island County's 2018 Ordinance C-97-18](#), updating the housing element after a comprehensive review of housing affordability.

Exhibit 42. Housing Element Update or Amendment: Adoption Steps Flow Chart



In tandem with preparing the housing element update or amendments, planners will need to conduct non-project environmental review under the State Environmental Planning Act (SEPA) ([RCW 43.21c](#)). SEPA considers the adoption of plans, policies and programs under any law to be non-project actions⁴², and SEPA applies to these types of actions.

SEPA ([RCW 43.21c](#)) helps government agencies consider the environment before taking actions, which includes “non-project” actions like the adoption of plans, policies and programs as well as “project” actions like development proposals ([WAC 197-11-060\(3\)](#)).

Amendments to the comprehensive plan, including the housing element, are considered a non-project action and require SEPA review. A jurisdiction may have several options for completing the SEPA process:

- **Relying on existing relevant SEPA documents** and adopting, adding or supplementing them along with threshold determinations as appropriate ([WAC 197-11-600](#)).

⁴² See description of non-project actions at [WAC 197-11-060](#).

- **Creating a new SEPA document** and threshold determination addressing the housing element update or amendments as a new non-project proposal. This may mean a determination of non-significance (DNS) and a checklist ([WAC 197-11-340](#)). Potentially a determination of significance (DS) and environmental impact statement (EIS) could be prepared if the housing element identified substantial proposed changes in policies and regulations such that it was important to review the proposals early ([WAC 197-11-360](#)).
- Local governments are encouraged to **integrate SEPA and GMA requirements** so that the decisions benefit from environmental information and the engagement process is seamless for the public ([WAC 197-11-235](#) et seq.). SEPA/GMA integration could include:
 - Preparing studies that inform both GMA and SEPA procedures,
 - Identifying early the features of the legislative proposal and potential alternatives for the decisionmaking and environmental review process,
 - Considering the likely threshold determination at the beginning,
 - Preparing a complete analysis of likely impacts even if using a non-project checklist,⁴³
 - Determining the associated schedule of document and notice preparation (see [Exhibit 43](#)), and
 - Early identification of policy or code-based mitigation measures (e.g., compatibility measures for different density housing types, etc.).

Environmental Review Resources

- [SEPA Handbook \(2018 update\)](#)
- [SEPA Frequently Asked Questions](#)
- [WAC 197-11: SEPA Rules](#)
- [WAC 197-11-210](#) thru 235: GMA / SEPA integration

See the tips on SEPA/GMA integration in [Exhibit 43](#), as well as the [SEPA Handbook](#) for more information.⁴⁴

Exhibit 43. SEPA/GMA Integration Tips

- **Integrated Process:** Required notices and public meetings or comment opportunities can be combined to meet SEPA and GMA requirements. For example, if the local government issues a DNS with a 14-day comment period, that could overlap the periodic review or annual amendment hearing(s) so that the public comment opportunities are in alignment and people can comment on both the proposals and the environmental review.
- **Integrated Document:** An integrated SEPA/GMA process can also mean an integrated document where the proposed policies and regulations are integrated with the SEPA-required analysis in one document. More commonly, GMA and SEPA documents are issued in separate volumes and at the same time for coordinated review. They could also be integrated in the same document, which may be more complex for future housing element amendments.

Final Steps

The final adopting ordinance may include key findings from the housing needs assessment as the rationale for adopting the amendments or update.

⁴³ See OLYMPIANS FOR SMART DEVELOPMENT & LIVABLE NEIGHBORHOODS, et al., Petitioners, v. CITY OF OLYMPIA, Respondent: Final Decision and Order, Case No. 19-2-0002c, available at: <https://www.qmhb.wa.gov/search/case>.

⁴⁴ SEPA Handbook, 2018: <https://ecology.wa.gov/DOE/files/4c/4c9fec2b-5e6f-44b5-bf13-b253e72a4ea1.pdf>.

Chapter 8. Implementing and Monitoring Your Housing Element

Adopting an updated housing element is only the first step toward achieving your new housing goals, policies and objectives. Moving from adoption of new or updated goals and policies to seeing new housing production that meets your community's needs would be more effective with an implementation and monitoring plan. This chapter provides guidance for the development of an implementation plan and monitoring framework.

While not required for a GMA housing element, identifying implementation steps and monitoring performance are important ways to help your community work toward housing goals. WAC 365-196-410(2)(f) lists a series of potential implementation steps and suggestions for monitoring. Some communities include an implementation and monitoring plan directly in their housing element or elsewhere in the comprehensive plan. Others treat this step as separate from, and subsequent to, the adoption of the housing element or comprehensive plan. Either approach can be appropriate.

Develop an Implementation Plan

An implementation plan identifies specific actions that will be needed to carry out the policies and/or strategies. It also organizes and prioritizes them in the form of a work plan that can guide next steps. When drafting your implementation plan, consider including the below components. Keep in mind that public and stakeholder engagement are essential for developing a successful implementation plan. See [Chapter 7. Adopting Your Housing Element](#) for recommendations.

Implementation Planning Matrix

An implementation planning matrix is a useful framework for organizing and prioritizing actions that will be needed to implement the housing element. Each housing policy and its associated strategies can require several actions to support effective implementation. A planning matrix is a way to identify, for each action, the responsible party (or parties), resources needed, implementation steps and a target timeline for completion. The same matrix can be used to track progress toward implementation in annual reports or as a live document on your website. Topics to consider in your implementation planning matrix include:

- An action's **priority** is determined by how critical it is for accomplishing the housing goals or objectives.
- The anticipated **timeline** for each action refers to how long it will take to implement that action. For example, categorizing actions as near-term (0-2 years), medium-term (3-5 years) and long-term (6-10 years).
- The matrix should identify **responsible parties** for each action. These can be departments or organizations that are key players in completing this step. Categorize parties as primary and secondary according to their needed level of involvement.
- The **method of accomplishing the action**, such as legislative, administrative or partnership development, should be noted.
- It is important to assess and plan how much **investment** and the level of effort an action requires, including staff and volunteer hours and financial resources, which can affect the action's timeline. This may be measured as a gradation of effort - minimal, moderate or significant.
- **Comments** such as potential resource needs, challenges, opportunities or other considerations.

[Exhibit 44](#) shows a simple example format for an implementation planning matrix for organizing this information. After identifying these elements for each action, they can be grouped to reveal priorities and

responsible parties. You can use this tool to begin allocating resources and starting processes necessary to accomplish the actions you've identified to meet your community's housing needs.

Exhibit 44. Example Format for an Implementation Planning Matrix

Policy H-3: Encourage the development of workforce housing supply in mixed-use centers.

Strategy H-3.1: Create a density bonus to incentivize new workforce housing production by private developers.

Action H-3.1.1: Conduct a market study to determine which kinds of incentives would maximize impacts.

Priority	Timeline	Type	Lead Party	Who can assist?	Investment
High	6 months	Administrative	Community and Economic Development Department		Staff – 0.5 Full-time employee (FTE)

Action H-3.1.2: Develop and adopt new density bonus program.

Priority	Timeline	Type	Lead Party	Who can assist?	Investment
High	1 year	Legislative	City Council	Community and Economic Development Department	Staff – 0.5 FTE

Implementation Schedule and Work Plan

A good example of a schedule and implementation work plan is shown in the [Bainbridge Island 2017 Comprehensive Plan](#), which identified 56 action items. In order to provide clarity about what would be necessary to achieve these items, each element of the comprehensive plan includes a work plan. The work plans consist of a matrix describing each action, along with tasks necessary to complete the action, tasks currently in progress and any completed tasks. The work plan also includes a graphic schedule, showing timing and required staff effort from different departments for each high-priority action. Progress toward implementation is reported annually. [Exhibit 45](#) shows some excerpts from the comprehensive plan and annual work plan priorities report. Beginning in 2019, the city now provides a report on progress to implement the actions identified within the comprehensive plan.

When developing your schedule, think about the following:

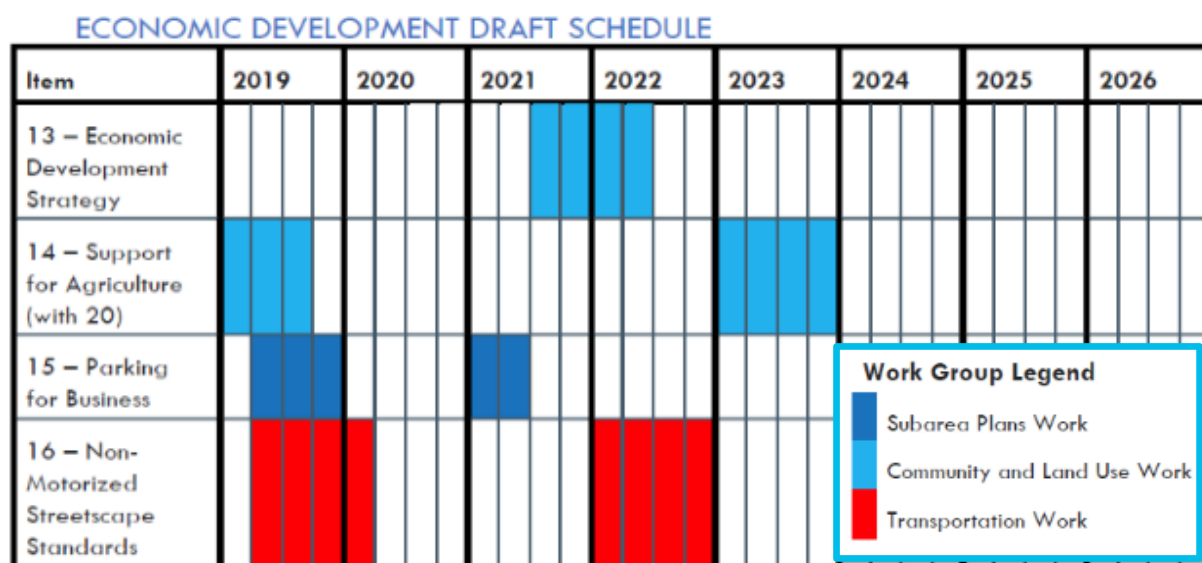
- Whether there are any windows of opportunity or time constraints that might motivate the scheduling of a high-priority action
- Steps, tasks and processes that will be required to implement the action
- Investment needed for each program or action (staff time, budget, etc.)
- Annual resources available (staff time, budget, partner capacity)
- Sequencing of actions with other actions, plan updates or work priorities

Next, start putting actions on the calendar, making sure to avoid overcommitting annual resources available to support implementation. The Economic Development Draft Schedule in [Exhibit 45](#) is a simple example.

Exhibit 45. Bainbridge Island 2017 Comprehensive Plan Economic Development Element Work Plan and 2019 Year-End Plan Priorities

	Implementing Actions	Tasks to Complete	Tasks in Progress	Completed Tasks
15	<u>High Priority EC Action #3</u> Assure that adequate parking is available to support businesses.	Begin strategy development Develop code updates	Implement medium term strategies	Winslow parking study
16	<u>High Priority EC Action #4</u> Identify capital projects and streetscape standards to implement Policy EC 11.1, to improve non-motorized facility links between the ferry terminal, downtown Winslow, and the harbor.	Transportation Improvement Plan Update Update streetscape standards	Capital Improvements Plan (CIP) Update	

Source: [City of Bainbridge Island, Economic Development Element Workplan and Schedule, 2019, p. EC-1](#)



Source: [City of Bainbridge Island, Economic Development Element Workplan and Schedule, 2019, p. EC-2](#)

Task 2.3.2

Jan 01, 2019 - Dec 31, 2019

Completed

Progress 100%

EC Action #3 - Task 2

Implement Medium Term Parking Strategies

During mid-2019, City staff met with downtown Winslow stakeholders to review options for short-term parking initiatives identified in the 2017 parking study. There was no consensus from community stakeholders to support the proposed changes. No further action is planned.

Source: City of Bainbridge Island, [2019 Year End Report Comprehensive Plan Implementation Update](#), p. 16

Another example of a housing implementation plan is included in Appendix D of [Redmond's Housing Action Plan](#), which includes the recommended actions, the phase of Redmond 2050, implementation timeframe, who is responsible, the amount of city resources needed, considerations and next steps, challenges, regulatory impacts and staff notes.

Develop a Monitoring Program

An important step of implementing your housing element is developing a program to monitor outcomes. A monitoring program can be designed to track progress toward achieving housing goals and evaluate the effectiveness of implementing actions.

Identify Performance Metrics

For each implementing action, identify performance metrics that can be used to track progress or outcomes over time. To identify appropriate metrics, first consider what change the action is designed to make in your housing system. Then consider the best available data source for tracking outcomes associated with that change.

A simple example of a performance metric is shown in [Exhibit 46](#). It links a housing action to a measurable goal and an appropriate performance metric for which data is already being collected. It also provides a goal that can be used to evaluate whether the action is working well enough or whether additional actions are needed.

WAC 365-196-410(2)(f)(iv): "The housing element should include provisions to monitor the performance of its housing strategy. A monitoring program may include the following:

(A) The collection and analysis of information about the housing market;

(B) Data about the supply of developable residential building lots at various land-use densities and the supply of rental and for-sale housing at various price levels;

(C) A comparison of actual housing development to the targets, policies and goals contained in the housing element;

(D) Identification of thresholds at which steps should be taken to adjust and revise goals and policies; and

(E) A description of the types of adjustments and revisions that the county or city may consider."

Exhibit 46. Example Framework for Performance Measurement

Action	Goal	Performance Metric	Performance Target
Allow detached accessory dwelling units (DADUs) in single family residential zones	Increase the diversity of housing options available in historically single-family neighborhoods	DADU permits	Permit 40 new DADUs before 2024 (10 units per year)

Redmond's [Final Housing Action Plan \(HAP\)](#) includes another example of potential indicators to consider for monitoring housing progress that can be applied to a housing element monitoring plan. A sampling of the general performance metrics and potential indicators in that report are included in [Exhibit 47](#). See Redmond's adopted HAP for the final list (forthcoming in 2021).

Exhibit 47. Redmond's Final HAP Potential Indicators for Monitoring Progress

General Plan Performance Metrics	Potential Indicators
Increase affordable housing units	Number of properties or units acquired/preserved by City, King County, ARCH or other organizations (report by AMI). Potential Data Sources: Assessor's data, ARCH, City of Redmond Data.
	Share of rent-burdened residents. Potential Data Sources: Census Data.
	Number of new affordable housing units built via MFTE and through the Inclusionary Housing/Zoning policy (report by AMI). Potential Data Sources: ARCH, City of Redmond Data.
	Number and description of affordable housing projects and partnership driven projects (describe partners and contributions). Potential Data Sources: King County, ARCH, Community Partners, City of Redmond, Assessor's Data.
	Share of rent-burdened residents. Potential Data Sources: Census Data.
	Number of requests ARCH and King County receives for tenant assistance from Redmond (waiting list information). Potential Data Sources: King County, ARCH Data.
Increase both market-rate and affordable housing production	Number of new market-rate and affordable homes in Redmond. Potential Data Sources: Assessor's Data, Agency Partners, Census Data.
Support TOD and investments in transit corridors	Number of new market-rate and affordable homes within ½ mile proximity/10- to 15-minute walk to transit stations. Potential Data Sources: Assessor's Data, Agency Partners, Census Data.
Increase housing options and choices	Number and type of new homes produced and total within the City over time - location, tenure, size, sale price/asking rent, and unit type (ADUs, backyard homes, condos, duplex, triplex, quadplex, townhome, etc.). Potential Data Sources: Assessor's Data, City of Redmond Data, CoStar, Census Data, or the State of Office of Financial Management Data.
	Share of homebuyers receiving assistance (e.g., down payment assistance). Potential Data Sources: ARCH, King County, Community Partners.
Increase in home-ownership support (targeting households not considered high-income)	Amount of funding and number of households supported by home-ownership programs. Potential Data Sources: ARCH, King County, Community Partners.
Increase in education and awareness on housing topics	Number of factsheets and educational materials released (including languages). Potential Data Sources: City of Redmond, ARCH.
	Number of meetings, training/educational workshops, events. Potential Data Sources: City of Redmond, ARCH, Community Partners.
	Number of participants, views to city website, requests for information. Potential Data Sources: City of Redmond.

Source: [Redmond's Final Housing Action Plan](#), 2021

In some cases, it doesn't make sense to have a unique performance metric and goal for each individual action. For instance, a city may adopt a series of different incentives for affordable housing production that are meant to work together as a package. The strategic objective of the entire package is to increase the number of new income-restricted affordable units built. Therefore, it makes sense to use an individual performance metric (affordable units built) for evaluating the effectiveness of the package. In this case it may also make sense to track how often developers use the individual incentives to determine if some are created in a way that makes them difficult to use. Interviews with housing developers following implementation can also be helpful to get feedback on what is working well and where there may still be barriers.

Integrate your Monitoring Program with Established Practices

One challenge many communities face is maintaining a monitoring program after the planning process is complete. This challenge is particularly acute in smaller jurisdictions with limited or no spare capacity for taking on additional tasks. One solution is to select performance metrics and a schedule for monitoring that builds on existing activities that are already being tracked. These could include:

- Comprehensive plan monitoring programs
- Buildable lands reports
- Growth monitoring
- Priority-based budgeting⁴⁵
- Annual reports or updates to elected officials

By building your monitoring program on established practices or efforts within your jurisdiction, you can gain efficiencies, promote coordination and consistency between initiatives, and decrease the chances that your ongoing monitoring program will be deprioritized in years to come.

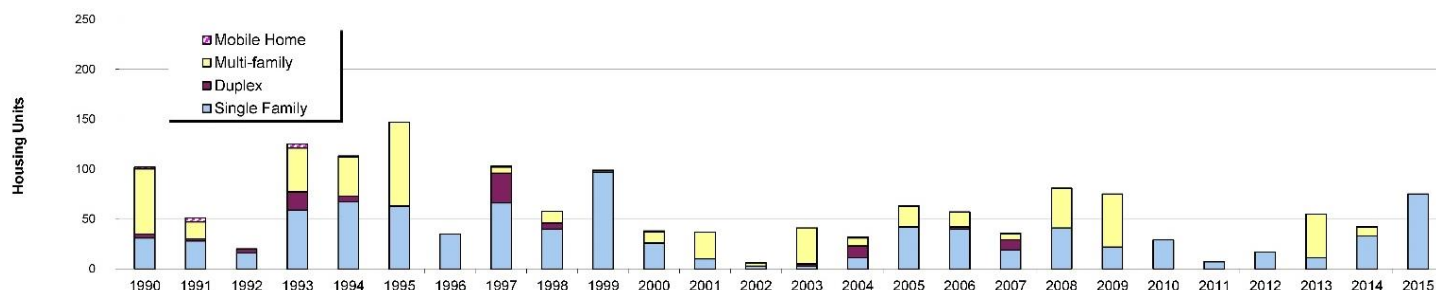
Example: Integrating performance measures into a growth monitoring report

Snohomish County and cities have adopted housing targets [for the number of units to go into each community](#).⁴⁶ Snohomish County has also committed to track the provision of affordable housing units in its [policy HO 4.B.1 to assess whether an adequate supply of housing affordable to residents of the county with lower incomes and special needs is being provided](#). Snohomish County also tracks development of residential units in its [Growth Monitoring Reports](#). The example from the City of Snohomish and its UGA shows the numbers of duplex, multifamily and single-family units built year to year ([Exhibit 48](#)).

⁴⁵ For examples see: Baily, Mike. 2015. Building the Budget around the Community it Serves. <http://mrsc.org/Home/Stay-Informed/MRSC-Insight/June-2015/Building-the-Budget-around-the-Community-it-Serves.aspx>

⁴⁶ Snohomish County Municipal Code, Appendix D: Growth Targets, <https://snohomish.county.codes/CompPlan/GPP-AxD>

Exhibit 48. Snohomish UGA (City and Unincorporated UGA) – New Housing Units Permitted by Type 1990-2015



Source: Snohomish County Tomorrow, 2016

Report on Outcomes

There are three ways to track and report on outcomes in your monitoring program. Each serves an important purpose.

1. Track and Report on Progress

Track and report on progress toward implementation of actions identified in your plan. As discussed in the implementation plan section above, this includes identifying whether work on an action has begun, what tasks or portions of the work have been completed, or whether the action is complete. [Exhibit 45](#) (above) includes an [example](#) from Bainbridge Island Comprehensive Plan.

2. Measure Progress Toward an Outcome Goal

Assess whether you are on track to achieve an outcome goal, such as a target number of new affordable units built by a certain year. The city of Tacoma does this in its [Results 253](#) website for performance monitoring across multiple city programs. An example visualization showing cumulative progress over time is shown in [Exhibit 49](#). The city also includes a discussion about the actions it has taken to achieve the goal.

3. Monitor Outcomes Over Time

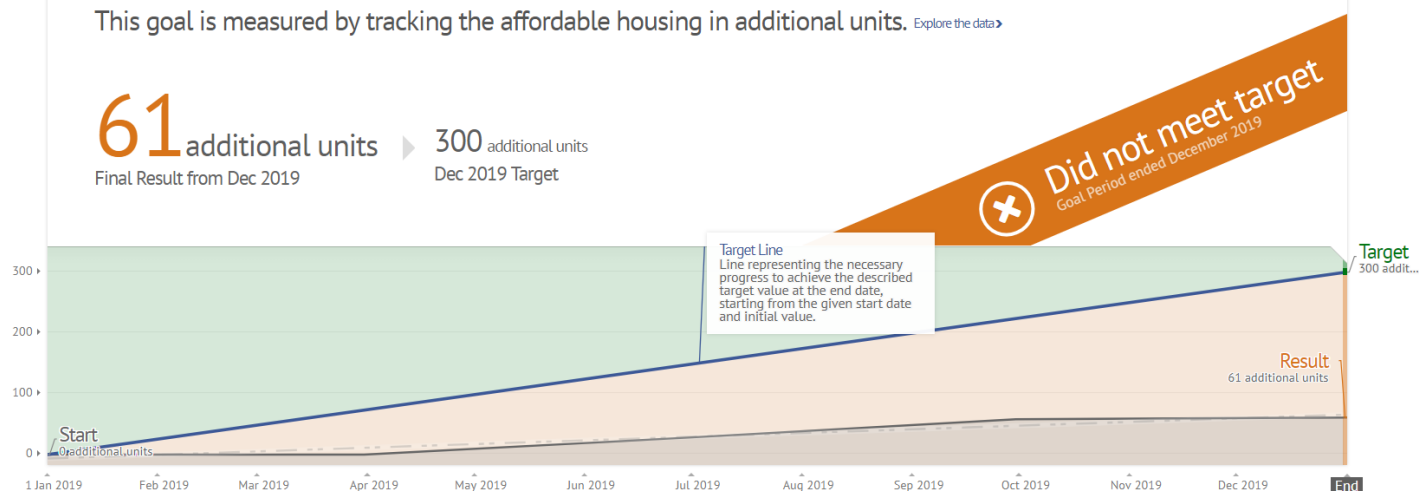
In addition to measuring progress from implementation toward a target goal, it can be helpful to track and visualize a performance metric over time, including before and after implementation of an action. This can be useful for understanding whether the actions taken had their intended effect or not. An example of this kind of tracking can be seen in the "[Draft Reasonable Measures Assessment](#)" conducted in support of the Kitsap County comprehensive plan update in 2015 ([Exhibit 50](#)). The visualizations clearly show the peak of units generated in 2005 followed by fluctuation. The dotted black line showing non-single family unit permits as a percentage of all permits provides useful context, since all permit activity reduced during the last economic recession.

This kind of performance monitoring is best for supporting a diagnosis of what may be the cause of outcomes. For instance, there may have been a change in permit staffing levels one year and an inconsistency in the way applications were handled. Or a peak may be due to a single atypical development that isn't expected to be a trend.

Exhibit 49. Affordable Housing Stock Goal in Tacoma's Results 253 Data Portal

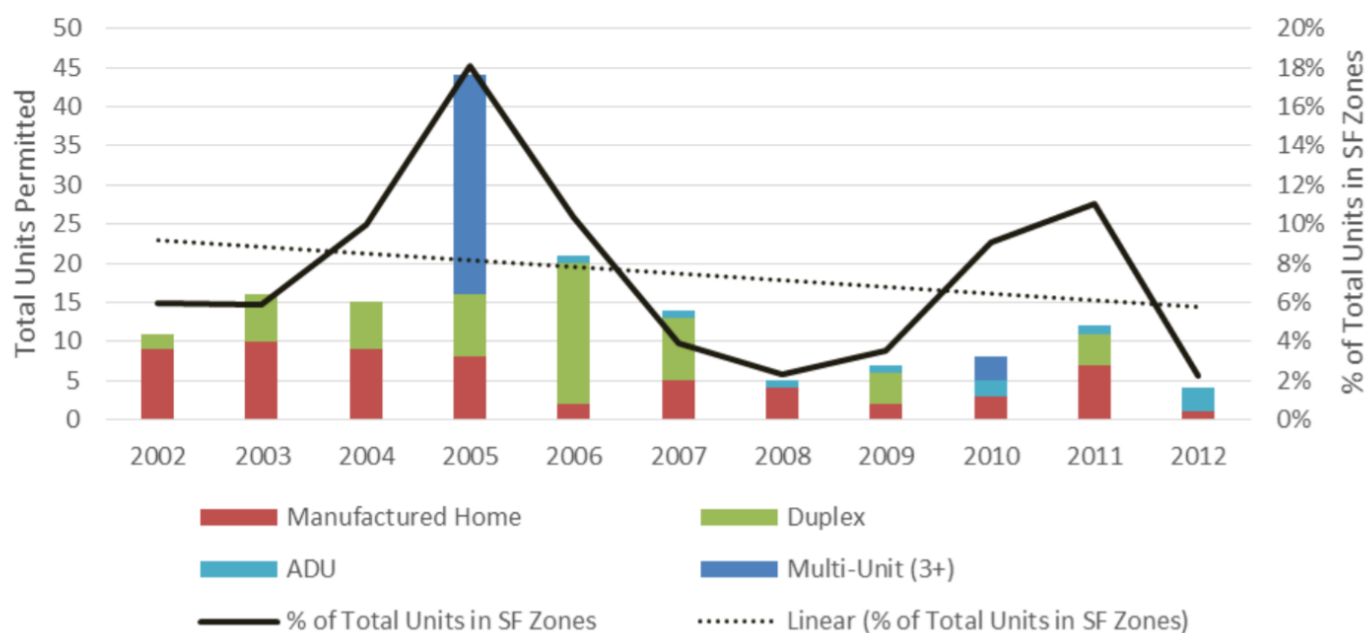
Increase the affordable housing units to 300 units by December 2019.

This goal is measured by tracking the affordable housing in additional units. [Explore the data](#)



Source: [City of Tacoma](#), 2020

Exhibit 50. Housing Diversity: Non Single-Family Units Permitted in Urban Growth Area (UGA) within Single Family Zones by Housing Type: 2002-2012



Source: Kitsap County Draft Reasonable Measures Assessment, 2015

Additional Examples of Monitoring Programs

- Skagit County and cities: The Skagit Council of Government's [Housing Action Plan](#) (2017) has an [annual growth monitoring report](#) that includes population, housing and jobs, as well as households by income level and units available by affordability level.
- The city of Chelan's [Comprehensive Plan](#) (2017) identifies measurable objectives for evaluating the implementation of the plan. These include several measures related to housing and affordability. See Exhibit 1-4.
- Snohomish County releases annual [Growth Monitoring Reports](#) that include residential development profiles showing unit mix produced for each city/UGA.

What Is the Monitoring Telling You?

As you conduct annual monitoring, you should be looking at what the results are telling you about policy implementation. Are you noticing the trends you expected as a result of policy changes? Are there other sources of data that might inform your progress and understanding of the trends you are seeing? Are there ways you can tweak the performance metrics to help understand barriers or track new trends? For example, if you are measuring the number of new accessory dwelling units and not seeing as many as you expected, how can you identify what the barriers are? Reasons may include development fees, access to financing, or regulatory barriers (i.e., setbacks, lot coverage).

Appendix A: Acronyms

ACS - American Community Survey
 ADU - accessory dwelling unit
 ARCH - A Regional Coalition for Housing (King County)
 AMI - area median income
 CHAS - Comprehensive Housing Affordability Strategy
 CPP - countywide planning policies
 DADU - detached accessory dwelling unit
 GIS - Geographic Information System
 GMA - Growth Management Act
 GMPC - Growth Management Planning Council (King County)
 HAP - Housing Action Plan
 HNA - housing needs assessment
 KCCOG - Kittitas County Council of Governments
 LAMIRD - local area of more intense rural development
 LCA - land capacity analysis
 MFI - median family income
 MFTE - multifamily tax exemption
 MPP - multicounty planning policies
 OFM - Office of Financial Management
 PSRC - Puget Sound Regional Council
 RCW - Revised Code of Washington
 SCT - Snohomish County Transit
 SEPA - State Environmental Planning Act
 SRO - single room occupancy
 UGA - urban growth area
 WAC - Washington Administrative Code

Appendix B: Housing Strategies

Revising Zoning Strategies	Process Improvements
Z-1: Reduce Minimum Lot Sizes	P-1: SEPA Threshold Exemption
Z-2: Require a Minimum Density	P-2: SEPA Infill Exemption
Z-3: Upzone	P-3: Subarea Plan with Non-Project EIS
Z-4: Increase Building Height	P-4: Planned Action
Z-5: Integrate or Adjust FAR Standards	P-5: Protection from SEPA Appeals on Transportation Impacts
Z-5: Increase Allowed Housing Types	P-6: Permitting Process Streamlining
Z-6a: Cottage Housing	P-7: Subdivision Process Streamlining
Z-6b: Duplexes, Triplexes and Fourplexes	Affordable Housing Incentives
Z-6c: Townhouses	A-1: Multifamily Tax Exemption
Z-6d: Courtyard Apartments	A-2: Density Bonuses for Affordable Housing
Z-6e: Micro-housing	A-3: Alternative Development Standards for Affordable Housing
Z-7: Increase or Remove Density Limits	A-4: Fee Waivers for Affordable Housing
Z-8: Revise ADU Standards	A-5: Inclusionary Zoning
Z-9: Offer Density and/or Height Incentives for Desired Housing	Funding Options for Affordable Housing Development
Additional Regulatory Standards	F-1: Local Option Taxes, Fees and Levies
R-1: Reduce Off-Street Parking Requirements	F-2: Local Housing Trust Fund
R-2: Relax Ground Floor Retail Requirements	F-3: "Found Land": Surplus Land and Other Opportunities
R-3: Reduce Setbacks, Lot Coverage and/or Impervious Standards	F-4: Partner with Local Housing Providers
R-4: Adopt Design Standards	Other Strategies
R-5: Use a Form-Based Approach	O-1: Strategic Infrastructure Investment
R-6: PUD/PRD and Cluster Subdivisions	O-2: Simplify Land Use Designation Maps
R-7: Manufactured Home and Tiny House Communities	O-3: Local Programs to Help Build Missing Middle Housing
Economic Displacement Strategies	O-4: Strategic Marketing of Housing Incentives
ED-1: Community Land Trusts	O-5: Temporary Emergency Housing
ED-2: Need-based Rehabilitation Assistance	Physical Displacement Strategies
ED-3: Down Payment Assistance	PD-1: Strategic Acquisition and Financing of Existing Multifamily Development
ED-4: Property Tax Assistance Programs	PD-2: Support Third-party Purchases of Existing Affordable Housing
Cultural Displacement Strategies	PD-3: Notice of Intent to Sell / Sale Ordinance
CD-1: Grants/Loans to Directly Support Small Businesses	PD-4: Foreclosure Intervention Counseling
CD-2: Financing Ground Floor Commercial	PD-5: Mobile Home Park Preservation and Relocation Assistance
CD-3: Preservation Development Authorities (PDA) and Ports	PD-6: Mobile Home Park Conversion to Cooperative
CD-4: Commercial Community Land Trust	PD-7: Tenant Relocation Assistance
CD-5: Community Benefits/Development Agreements	PD-8: Just Cause Eviction Protections
CD-6: Micro-retail and Flexible Cultural Space Design	PD-9: "Right to Return" Policies for Promoting Home Ownership
CD-7: Business Incubators, Co-working Spaces and Artisan/Makers Spaces	PD-10: Regulation Short-term Rentals

Appendix C: Housing Law and Case Law

Washington State Housing Requirements

Requirement	GMA	Code Cities	Cities & Towns	Counties	General Provisions
Accessory dwelling units: New GMA definitions and limits to parking limits within ¼ mile of a major transit stop. ESSB 6617 (2020)	RCW 36.70A.696 – 699.				
A local government is limited in the amount of parking it may require for certain types of development occurring within ¼ mile of a transit stop. SHB 2343 (2020)	RCW 36.70A.620				
A city may regulate religious organizations that host temporary encampments for the homeless. ESHB 1754 (2020)		RCW 35A.21.360		RCW 36.01.290	RCW 35.21.915
Group homes and inpatient facilities may not be precluded by local zoning. GMA jurisdictions should review list of essential public facilities. Updated in HB 2640 (2020)	RCW 36.70A.200 WAC 365-196-550		RCW 35.64.140		
Permanent supportive housing must not be prohibited in areas zoned for multifamily housing. Definition in RCW 36.70A.030 (16), E2SHB 1923 (2019), and SHB 2343 (2020)	SHB 2343 (2020)	RCW 35A.21.305			RCW 35.21.689
Manufactured homes must be allowed on all lots. A city or town may not discriminate against consumers' choices in the placement or use of a home. This statute sets out design requirements, but this was revised in 2019 to state that a city may not use setbacks on an existing lot to prohibit a manufactured home. It also sets standards around recreational vehicles and tiny homes. Updates by ESSB 5183 (2019)		RCW 35A.21.312 RCW 35A.63.146 For non-conforming use protections	RCW 35.63-161	RCW 36.01.225 RCW 36.70.493	RCW 35.21.684
A city or town may adopt an ordinance to regulate the creation of tiny home communities. ESSB 5383 (2019)					RCW 35.21.686
Communities must allow density bonuses for affordable housing located on property owned by a religious organization. SHB 1377 (2019)	RCW 36.70A.545	RCW 35A.63.300	RCW 35.63.280		

Requirement	GMA	Code Cities	Cities & Towns	Counties	General Provisions
GMA updates to definitions for “affordable housing,” “low-,” “very low-” and “extremely low-income households.” E2SHB 1923 (2019) and permanent supportive housing	RCW 36.70A.030				
Parking near transit: A local government planning under the GMA is limited in the amount of parking it may require for certain types of development occurring within ¼ mile of a transit stop. E2SHB 1923 (2019)	RCW 36.70A.620				
Residential structures that are occupied by persons with handicaps must be regulated the same as a similar residential structures occupied by a family or other unrelated individuals. (1993)	RCW 36.70A.410 WAC 365-196-860	RCW 35A.63.240	RCW 35.63.220	RCW 36.70.990	
Family day-care facilities may not be prohibited. No county or city may prohibit the use of a residential dwelling, located in an area zoned for residential or commercial use, as a family day-care provider's home facility.	RCW 36.70A.450 WAC 365-196-865	RCW 35A.63.215	RCW 35.63.185	RCW 36.70.757	RCW 35.21.688
Accessory dwelling units must be allowed by communities over 20,000 and counties over 125,000 in population.	RCW 36.70A.400	RCW 35A.63.230	RCW 35.63.210	RCW 36.70.677	
Rent control is prohibited. May not regulate the amount of rent to be charged for single-family or multiple-unit residential rental structures or sites other than properties in public ownership, under public management or properties providing low-income rental housing.				RCW 36.01.130	
OPTIONAL TOOLS					
GMA cities may enact affordable housing incentive programs. (2009)	RCW 36.70A.540 WAC 365-196-870				
GMA cities may adopt provisions to increase residential capacity. Such provisions are protected from SEPA and GMHB appeal until April 2023. E2SHB 1923 (2019) and SSB 2343 (2020)	RCW 36.70A.600				

Requirement	GMA	Code Cities	Cities & Towns	Counties	General Provisions
Disposal of surplus government property for housing. Property may be offered at low or no cost for a public benefit of affordable housing. 3SHB 2382 (2018), RCW 39.33.015					
Exempting emergency housing from impact fees. SHB 2538 (2018)	See RCW 82.02.060 (2)-(3)				

Legal Cases to Consider

In some cases, case law sets the standard for what may or not be included in local policies. A local government can only be held to the decisions of its regional Growth Management Hearings Board, so we recommend reviewing the digests and cases from the regional board, and any subsequent appeals, however, some general themes have emerged that can provide guidance to all jurisdictions.

City responsibility to “set the table” for the development of affordable housing: “Developing programs that will provide affordable housing opportunities and special needs housing opportunities for the low-income, very low-income, extremely low-income, and disabled and senior citizens of Lakewood is, as the City acknowledges, its responsibility.” [LIHI II, 01-3-0023, FDO, at 14]

“The Board recognizes too that the County is not obligated to add to the stock of low income housing but instead to set the framework in which the market can provide housing for all segments of the population.” [Campbell v. San Juan County, Case No. 09-2-0104, FDO at 14 (Jan. 27, 2010)]

Local governments have choices in planning for housing: “RCW 36.70A.020(4) does not require that each and every land use designation of a jurisdiction provide for affordable housing.” [LMI/Chevron, 98-3-0012, FDO, at 29.]

“The Act requires cities and counties to preserve existing housing while promoting affordable housing and a variety of residential densities and housing types. No jurisdiction is required to reconcile these seemingly inconsistent requirements by totally focusing on one requirement, for instance preserving existing housing, to the exclusion of other requirements, such as encouraging more affordable housing. Instead, jurisdictions must reconcile the Act’s seemingly contradictory requirements by applying and necessarily balancing them.” [WSDF I, 94-3-0016, FDO, at 30.]

“...each housing element must be considered on its own merits under a fact-specific analysis, and each city or county necessarily plans and words its housing element differently in order to address local needs.” Each jurisdiction “has the discretion to determine the zoning required – whether small lot, duplex, multi-family, or mixed use – so long as the plan includes sufficient land for housing all economic segments of its community...” [Futurewise V, 07-3- 0014, FDO, at 8.]

“A comprehensive plan policy regarding affordable housing must be specific and must be implemented by development regulations to comply with the GMA.” [Friday Harbor v. San Juan County 99-2-0010 (FDO, 7-21-99)]

Local housing elements must be consistent with countywide planning policies and must plan for all economic segments: “The City’s Housing Element must “make adequate provision” for existing and projected housing needs of this economic segment of the community” The challenged Comprehensive Plan Housing Element was inconsistent with the Countywide Planning Policies for King County because Ordinance O2015-396 failed to establish any numeric or percentage goals for the City’s “share” of countywide housing needs in the moderate, low, and very low income housing categories, contrary to RCW 36.70A.100 and RCW 36.70A.210(1). [Paul Stickney and Richard Birgh v. City of Sammamish, Case No. 15-3-0017, affirmed by Court of Appeals of Washington, Division 1, in Stickney v. Cent. Puget Sound Growth Mgmt. Hearings Bd., 11 Wash. App. 2d 228, 453 P.3d 25 (2019)].

More diverse residential landscape: “In the GMA, there are a number of specific references that address housing and residential land uses, some of them more explicit and directive than others. There are at least five sections of the Act that are on point. When these sections are read together, they describe a legislatively preferred residential landscape that, compared with the past, will be less homogeneous, more diverse, more compact and better furnished with facilities and services to support the needs of the changing residential population.” [Children’s I, 95-3-0011, FDO, at 5.]

Preserving neighborhood character: “The GMA clearly encourages the preservation of existing housing stock (See [RCW 36.70A.020\(4\)](#)) and provides for ensuring the vitality and character of established residential neighborhoods (See [RCW 36.70A.070\(4\)](#)). However, as the Board stated, supra, “any opportunity to perpetuate an “historic low-density residential” development pattern, [in the subarea], ended in 1994 when the County included the area within the UGA.” It is clear that existing housing stock and neighborhoods may be maintained and preserved, however existing low-density patterns of development cannot be perpetuated.” [MBA/Brink, 02-3-0010, FDO, at 14-15.]

“The requirement to “ensure neighborhood vitality and character” is neither a mandate, nor an excuse, to freeze neighborhood densities at their pre-GMA levels. The Act clearly contemplates that infill development and increased residential densities are desirable in areas where service capacity already exists, i.e., in urban areas – while also requiring that such growth be accommodated in such a way as to “ensure neighborhood vitality and character.” [Benaroya I, 95-3-0072c, FDO, at 21.]

Rural ADUs: “All three Hearings Boards have discouraged detached accessory dwelling unit provisions without specific criteria to curtail indiscriminate increased density.” [Loon Lake, et al. v. Stevens County, EWGMHB Case No. 01-1-0002c, Order on Motions, at 10 (Oct. 25, 2007)].

Monitoring progress: “The Board observes that the affordable housing percentages for income levels are targets to be adjusted and/or met over the 20-year life of the Plan. One should not expect them to be achieved half-way into the Plan’s time horizons. Peaks and valleys in progress will obviously occur over time depending upon numerous factors. But monitoring progress toward the targets is essential – which the County clearly does as reflected in the Housing Appendix and Benchmarks Reports.” [S/K Realtors, 04-3- 0028, FDO, at 36.]

Homelessness: There has been significant work on addressing homelessness. MRSC has a number of blog articles on this topic. The fundamental point is that a local government cannot render homelessness a crime if there is not sufficient housing/shelter options available. From MRSC:

- [Is Your Camping Ordinance Constitutional?](#)
- [What Are Local Governments Doing in Response to *Martin v. City of Boise*?](#)
- [New Legislation on Temporary Homeless Encampments](#)
- [Homelessness and the Limits of Enforcement](#)
- [Living in Vehicles: How Homestead Rights Affect Municipal Impounds](#)

Appendix D: Housing Element Policy Examples

The Department of Commerce has collected a variety of housing element policies as examples. **The policies have been arranged by topic and then arranged from strong policies to softer, longer-range policies.** See where in the range your community would fit within the ranking of the policies, based on their strength.

- Preservation
 - Maintenance and Code Enforcement
- Variety of Housing Types
 - ADUs, Tiny Homes and Manufactured Homes
 - Infill Development and Density Near Places of Opportunity
- Home Ownership
- Accommodate Growth
- Housing Location and Transportation and Land Use
 - Location of Affordable Housing
 - Jobs/Housing Balance
- Infrastructure
 - College Housing
 - Rural and Farmworker Housing
- Affordable and Subsidized Housing
 - Incentives or Requirements
 - Funding or Financing
 - Prevent Barriers
- Vulnerable Populations and Homelessness
 - Special-Needs Housing
 - Homeless Focus
 - Aging Adult Focus
 - Surplus Land and Nonprofit Housing
- Equity, Displacement and Integration
- Regional Coordination and Fair Share
- Design and Development Standards
 - Sustainable Housing
 - Historic Preservation
- Tracking and Monitoring

PRESERVATION

Policy Text Quote	Source
Continue to fund the repair and rehabilitation of single-family and multi-family housing using federal, state, and local funding sources.	Public Service Policy PS8.1, Olympia Comprehensive Plan, 2019
Coordinate with local organizations and agencies to provide sufficient and affordable home maintenance and support services.	Housing Element - Goal H-3, Policy A, Program 2, City of Ellensburg Comprehensive Plan, 2019
Pursue public-private partnerships to preserve existing affordable housing stock and develop additional units.	Housing Element Policy H20, Shoreline Comprehensive Plan, 2012
In conjunction with public and private housing providers, the City should identify and encourage preservation of affordable units in publicly assisted (subsidized) housing developments that are at risk of converting to market rate housing.	Housing Element Policy 4.2.1, Mount Vernon Comprehensive Plan, 2016
Promote the maintenance, repair, and rehabilitation of the City's existing housing stock. Pursue financial incentives and funding for housing improvement programs, especially for low-income households.	Housing Policy H-2.2, Prosser Comprehensive Plan, 2018
Encourage and support efforts to maintain opportunities for lower-cost housing where relatively affordable housing exists through preservation or other efforts and particularly in centers where most redevelopment pressure will occur.	Housing Policy HO-41, Redmond Comprehensive Plan, 2011
Encourage homeowners to take advantage of existing maintenance and preservation programs, services, and resources including the Wenatchee Housing Rehabilitation Loan Program.	Housing Element – Maintenance & Preservation: Policy 3, Wenatchee Urban Area Comprehensive Plan, 2014
Encourage the rehabilitation, relocation and reuse, rather than demolition, of existing housing.	Housing Chapter Policy H-34, Bellingham Comprehensive Plan, 2016

NOTE: Be careful of policy language that is about protecting character or seems exclusionary.

Maintenance and Code Enforcement

Policy Text Quote	Source
Enforce the City's Rental Registration and Safety Inspection Program to ensure that rental housing units comply with life and fire safety standards and provide a safe place for tenants to live.	Housing Chapter Policy H-30, Bellingham Comprehensive Plan, 2016
Develop minimum property maintenance standards to ensure the safety and suitability of existing housing stock.	Housing Element Policy 2.2, Walla Walla Comprehensive Plan, 2018

VARIETY OF HOUSING TYPES

Policy Text Quote	Source
Accommodate changing demographic trends and housing preferences by allowing accessory units, co-housing, and other nontraditional housing types in appropriate locations.	Housing Element Policy H-3.3, Yakima Horizon 2040, 2017
Provide incentives for developers that include a mix of housing types within new housing developments such as a broader assortment of housing sizes, accessory apartments, duplexes, etc.	Housing Element Policy H-3.6, Yakima Horizon 2040, 2017
Develop and implement regulations that encourage diversity of new housing types and expand housing choices throughout Wenatchee.	Housing Element – Housing Affordability: Policy 1, Wenatchee Urban Area Comprehensive Plan, 2014
Ensure policies, codes and ordinances allow for a compatible mix of uses and housing types in neighborhoods.	Housing Element Policy H-3.1, Yakima Horizon 2040, 2017
Allow a variety of housing types to meet needs of households of varying sizes, income levels and preferences. Create regulations that allow alternatives to single-family detached housing such as attached housing, townhomes, cottage or cluster housing, accessory dwelling units, manufactured housing, floating homes, housing in multiuse projects, and other innovative housing types.	Housing Policy HO-6, Ridgefield Comprehensive Plan, 2016
Support variable lot sizes in new subdivisions and housing type diversity within development projects.	Housing Element – Housing Equity: Policy 3, Wenatchee Urban Area Comprehensive Plan, 2014
Provide an array of housing choices such as apartments, small lot single-family housing, accessory dwelling units, townhomes, manufactured homes, and cottages to meet the needs of people of all incomes throughout their lifespan.	Housing Element Policy 1.1, Walla Walla Comprehensive Plan, 2018
Provide for a range of housing types and densities for all economic segments of the population. Encourage equal and fair access to housing for renters and homeowners.	Housing Policy H-1, Vancouver Comprehensive Plan, 2011
Promote a wide range of housing types and housing diversity to meet the needs of the diverse population and ensure that this housing is available throughout the community for people of all income levels and special needs.	Housing Element Policy H 1.18, Spokane Comprehensive Plan, 2017

ADUs, Tiny Homes and Manufactured Homes

Policy Text Quote	Source
Support the creation and preservation of manufactured home parks as an important source of affordable housing in the city.	Housing Element – Maintenance & Preservation: Policy 5, Wenatchee Urban Area Comprehensive Plan, 2014

Policy Text Quote	Source
Allow one accessory dwelling unit as an ancillary use to single-family homes in all designated residential areas as an affordable housing option.	Housing Element Policy H 1.20, Spokane Comprehensive Plan, 2017
Promote the development of accessory dwelling units (ADUs) within new and existing single-family developments. Consider incentives for new housing developments that include a percentage of ADUs as part of the new construction, as well as explore opportunities to promote ADU construction in existing homes.	Housing Policy HO-32, Redmond Comprehensive Plan, 2011
Integrate smaller housing types, such as cottages, duplexes, townhouses, and accessory dwelling units, into residential neighborhoods.	Housing Element Policy H-1.3, Anacortes Comprehensive Plan, 2016
Facilitate lifecycle or “cradle to grave” neighborhoods and community stability by promoting alternative living arrangements such as accessory dwelling units (ADUs), shared housing, cohousing, and smaller housing types.	Housing Element – Housing Equity: Policy 2, Wenatchee Urban Area Comprehensive Plan, 2014
Allow development of single-room occupancy units in downtown Spokane and in other areas where high-density housing is permitted.	Housing Element Policy H 1.21, Spokane Comprehensive Plan, 2017
Consider the potential for development of tiny houses in selected areas of the city.	Housing Element Policy H-1.4, Anacortes Comprehensive Plan, 2016
Consider regulations that would allow cottage housing in residential areas, and revise the Development Code to allow and create standards for a wider variety of housing styles.	Housing Element Policy H6, Shoreline Comprehensive Plan, 2012
Encourage demonstration projects of innovative housing types or programs, such as co-housing, tiny houses, or others.	Housing Element Policy H-1.9, Anacortes Comprehensive Plan, 2016

NOTE: Manufactured homes must be allowed on all lots. Manufactured housing must not be regulated differently from site-built housing, but jurisdictions may require certain standards. Jurisdictions may not use setbacks limits to prohibit placement of a manufactured home on an existing lot. See [RCW 35A.21.312](#), [RCW 35A.63.145](#), [RCW 35.63.160-161](#), [RCW 36.01.225](#) and [RCW 35.21.684](#).

Infill Development and Density Near Places of Opportunity

Policy Text Quote	Source
Actively support residential rehabilitation and infill. Incentives such as reduction of System Development Charges (SDC) and Traffic Impact Fees (TIF) for infill projects can ease the financial burden of such developments enough to make these profitable and attractive for developers. The City can also actively seek grants and funding from State and Federal sources to partially subsidize development or redevelopment of infill lots.	Housing Policy HO-9, Ridgefield Comprehensive Plan, 2016
Promote residential development of infill sites throughout the urban area by increasing densities where appropriate.	Housing Element – Housing Affordability: Policy 3, Wenatchee Urban Area Comprehensive Plan, 2014

Policy Text Quote	Source
Encourage residential infill development on existing lots in the City, including the preparation of an inventory of potentially available lots with utilities, adoption of a zone code amendment that facilitates development of substandard lots for infill residential development, and amendments to appropriate codes to simplify and encourage consolidation of substandard lots to facilitate residential infill.	Housing Element Policy Implementation 4.3, Fife Comprehensive Plan, 2005
Encourage infill as a redevelopment concept. Appropriate development regulations that accomplish infill should consider: 1. The Impact on older/existing neighborhoods; 2. Development that is compatible with the surrounding residential density, housing types, affordability or use characteristics; 3. Encouragement of affordable units; 4. The provision of development standards and processes for infill regardless of the sector (public, not-for-profit, or public sectors) creating it; and, 5. Compatibility with historic properties and historic districts.	Housing Element Policy H-3.2, Yakima Horizon 2040, 2017
Encourage infill housing on vacant or underutilized parcels having adequate services, and ensure that the infill development is compatible with surrounding neighborhoods.	Housing Element Policy 2.1.1, Mount Vernon Comprehensive Plan, 2016
Consider adopting regulations such as flexible lot sizes that encourage infill development on small lots consistent with the neighborhood's character.	Housing Element Policy 2.1.3, Mount Vernon Comprehensive Plan, 2016
Review commercial zoning regulations that require commercial development along with residential development. Consider adding criteria that would allow, in certain circumstances, residential uses to develop independently or within commercial flex space.	Housing Chapter Policy H-6, Bellingham Comprehensive Plan, 2016
Encourage increased density residential development in mixed-use and town center zones, especially those located within the City's Regional Growth Center, subject to compliance with appropriate development and design standards. Discourage or prohibit new detached single-family dwellings in these areas to promote more intensive use of commercial and mixed-use properties in order to accommodate an increasing share of the City's anticipated future population growth.	Housing Element Policy HS2D, University Place Comprehensive Plan, 2015

HOME OWNERSHIP

Policy Text Quote	Source
Create opportunities for ownership housing in a variety of settings, styles, sizes and affordability levels throughout Redmond.	Housing Policy HO-12, Redmond Comprehensive Plan, 2011
Provide information to residents, including underserved populations, on affordable housing opportunities and first-time homeownership programs.	Housing Chapter Policy H-23, Bellingham Comprehensive Plan, 2016
Help low-income and special needs residents find ways to purchase housing, such as shared or limited-equity housing, lease-purchase options, co-housing, land trusts, and cooperatives.	Public Service Policy PS9.6, Olympia Comprehensive Plan, 2019

Policy Text Quote	Source
Encourage existing housing providers and private lenders to provide homebuyer education seminars for potential first-time homebuyers; include outreach to current renters.	Housing Element Policy YKH 1.2, Yakima Horizon 2040, 2017
Promote opportunities for home ownership and owner occupancy of single- and multifamily housing.	Housing Policy H-7, Vancouver Comprehensive Plan, 2011
Explore with the County, other local jurisdictions, and private lending institutions the availability and enhancement of educational programs for first time homebuyers.	Housing Element Policy 4.3.5, Mount Vernon Comprehensive Plan, 2016

ACCOMMODATE GROWTH

Policy Text Quote	Source
Support increasing housing densities through the well-designed, efficient, and cost-effective use of buildable land, consistent with environmental constraints and affordability. Use both incentives and regulations, such as minimum and maximum density limits, to achieve such efficient use.	Housing Policy PL16.1, Olympia Comprehensive Plan, 2019
Provide a continuous and adequate supply of residential land to meet long-range multifamily and single-family housing needs for the City's anticipated population growth. The City shall adopt policies and regulations to meet the following objectives: <ul style="list-style-type: none"> • New overall density target of six units per net acre. • No more than 75% of new houses shall be of a single housing type. • A minimum density of four units per net acre (10,890 sq. ft. average lot size) for single-family dwellings in any single development. 	Housing Policy HO-1, Ridgefield Comprehensive Plan, 2016
Prohibit any rezone that results in a reduction in residential capacity without first approving another rezone or rezones, resulting in at least a replacement of the lost residential capacity elsewhere in the city.	Housing Policy HO-17, Redmond Comprehensive Plan, 2011
Consider the impacts on Citywide housing capacity, affordability and diversity when making land use policy decisions and code amendments.	Housing Chapter Policy H-13, Bellingham Comprehensive Plan, 2016
Consider minimum density requirements for residential zones and commercial zones where residential development is allowed.	Housing Chapter Policy H-5, Bellingham Comprehensive Plan, 2016
Promote a mix of new residential units and use other strategies that are designed to at a minimum meet the targets called for in the King County Countywide Comprehensive Planning Policies for creating residences that are affordable to low- and moderate-income households.	Housing Policy HO-2, Redmond Comprehensive Plan, 2011

HOUSING LOCATION AND TRANSPORTATION AND LAND USE

Policy Text Quote	Source
Direct new residential development into areas where community and human public services and facilities are available.	Housing Element Policy H 1.4, Spokane Comprehensive Plan, 2017
Ensure that plans provide increased physical connection between housing, employment, transportation, recreation, daily-needs services, and educational uses.	Housing Element Policy H 2.4, Spokane Comprehensive Plan, 2017
Provide for development of multifamily housing in areas close to shopping, employment, services and public transportation.	Housing Element Policy H-1.7, Anacortes Comprehensive Plan, 2016
Create opportunities for housing developments to be easily accessible from both vehicle and bike/ped transportation corridors.	Housing Policy H-5.5, Prosser Comprehensive Plan, 2018
Support high-density and mixed commercial/residential development in the City's urban villages, high capacity transit corridors connecting the villages and other appropriate areas that allow people to work, shop and recreate near where they live.	Housing Chapter Policy H-1, Bellingham Comprehensive Plan, 2016
Encourage and provide incentives for residences above businesses.	Housing Policy PL16.8, Olympia Comprehensive Plan, 2019
Encourage residential development in commercial and mixed use zones, especially those within proximity to transit.	Housing Element - Goal H-2, Policy B, City of Ellensburg Comprehensive Plan, 2019
Promote accessible and affordable housing in areas that are close to services and the rest of the community.	Housing Element - Goal H-3, Policy A, Program 1, City of Ellensburg Comprehensive Plan, 2019
Consider the impacts of transportation costs on housing affordability and accessibility of services and other opportunities when planning for housing.	Housing Chapter Policy H-17, Bellingham Comprehensive Plan, 2016
Increase the supply of affordable rental and ownership housing that is context sensitive throughout the City, especially in areas with good access to transit, employment, education and services.	Housing Chapter Policy H-16, Bellingham Comprehensive Plan, 2016

Jobs/Housing Balance

Policy Text Quote	Source
Ensure an appropriate supply and mix of housing and affordability levels to meet the needs of people who work and desire to live in Redmond, especially near existing and planned employment centers, such as Downtown, Overlake and SE Redmond.	Housing Policy HO-18, Redmond Comprehensive Plan, 2011

Policy Text Quote	Source
Encourage development of housing at pricing levels affordable for workers in a variety of sectors in Ridgefield, to increase the percentage of people who work in Ridgefield that can also find suitable housing in Ridgefield. Work with employers to promote residential options in Ridgefield to their employees, and to understand the housing needs of their employees.	Housing Policy HO-5, Ridgefield Comprehensive Plan, 2016
Encourage the creation of mixed-use areas throughout the City characterized by living wage jobs, mixed income housing, and ample public open spaces all within a walkable urban context.	Housing Element Policy 3.1.1, Mount Vernon Comprehensive Plan, 2016
Encourage Redmond employers to develop employer-assisted housing programs and provide technical assistance to employers wishing to obtain information on model programs.	Housing Policy HO-20, Redmond Comprehensive Plan, 2011

Location of Affordable Housing

Policy Text Quote	Source
Locate affordable housing throughout the city and especially in areas with good access to transit, employment, education, and shopping.	Housing Element Policy H-3.5, Anacortes Comprehensive Plan, 2016
Integrate housing for lower and moderate income households and those with special needs into a variety of geographical locations throughout the city.	Housing Element Policy 2.1, Walla Walla Comprehensive Plan, 2018

Note: Policy choices may include providing affordable housing in a variety of locations around the city, preferably with a special focus on areas close to transit and other services. Be careful of language that may seem exclusionary or “not in my backyard” (NIMBY).

INFRASTRUCTURE

Policy Text Quote	Source
Provide physical infrastructure, recreational and cultural amenities, and educational facilities in Downtown and Overlake to support the creation of attractive neighborhoods for residents of all ages, incomes and household types.	Housing Policy HO-16, Redmond Comprehensive Plan, 2011
Support public and private investment in improved infrastructure and amenities in existing neighborhoods, particularly in areas with high concentrations of low-income housing.	Housing Chapter Policy H-29, Bellingham Comprehensive Plan, 2016
Leverage private investment in distressed neighborhoods through strategic infrastructure and service improvements.	Housing Element – Maintenance & Preservation: Policy 4, Wenatchee Urban Area Comprehensive Plan, 2014
Work closely with local governments and the private sector to extend infrastructure and provide other services to accommodate residential growth, particularly in Urban, Rural Settlement and Rural Transitional areas which are suitable for higher density development.	Housing Element Policy H-1.5, Yakima Horizon 2040, 2017

College Housing

Policy Text Quote	Source
Work with local institutions of higher education to develop a comprehensive strategy addressing issues associated with off-campus student housing, including adequate off-campus housing that is high quality and compatible with its surroundings (see Land Use Chapter).	Housing Chapter Policy H-43, Bellingham Comprehensive Plan, 2016

Rural and Farmworker Housing

Policy Text Quote	Source
Continue to allow seasonal and accessory farm worker accommodations in rural and agricultural resource areas, with the requirement that one or more persons in each household must be employed by the property owner.	Housing Element Policy H-7.1, Yakima Horizon 2040, 2017
Work with the agricultural community to develop criteria and a process for siting permanent and migrant farm worker housing in rural and agricultural resource areas with consideration given to neighborhood and project security, health and sanitation, availability of public services, access, child care, and the availability of affordable housing in a nearby urban area.	Housing Element Policy H-7.2, Yakima Horizon 2040, 2017
Provide a siting process to expedite farm worker housing projects using preapproved designs for housing of both temporary and permanent farm workers employed by the property owner.	Housing Element Policy H-7.3, Yakima Horizon 2040, 2017
Continue to work with state and local agencies to remove barriers to providing farmworker housing, and explore innovative approaches to meeting farm worker housing needs.	Housing Element Policy H-7.4, Yakima Horizon 2040, 2017
New, residential construction adjacent to designated forest, agricultural or mineral resource lands should be designed and sited to reduce potential conflicts between residents and adjacent resource lands.	Housing Element Policy H-5.1, Yakima Horizon 2040, 2017
Housing in designated agriculture, mineral or forest lands should be considered secondary to the primary use of those areas.	Housing Element Policy H-5.2, Yakima Horizon 2040, 2017

AFFORDABLE OR SUBSIDIZED HOUSING

Policy Text Quote	Source
Develop and implement a detailed affordable housing program that identifies specific actions to increase the supply of housing that is affordable to low to middle-income individuals and families.	Housing Element Policy H-3.10, Anacortes Comprehensive Plan, 2016

Policy Text Quote	Source
Provide affordable housing by formulating innovative policies, regulations and practices, and establishing secure funding mechanisms. Target affordability programs toward households with incomes below the median.	Housing Policy H-2, Vancouver Comprehensive Plan, 2011
Achieve a minimum of 25 percent of the Pierce County 2030 growth population allocation for University Place through affordable housing – consistent with CPP AH-3.3.	Housing Element Policy HS3E, University Place Comprehensive Plan, 2015
Develop meaningful, measurable goals and strategies that promote the development of affordable workforce housing to meet local needs and monitor progress toward meeting those goals.	Housing Element Policy H-3.2, Anacortes Comprehensive Plan, 2016
Participate in and promote the development of educational resources and programs that assist low and moderate-income households in obtaining affordable and suitable housing.	Housing Element Policy H 1.5, Spokane Comprehensive Plan, 2017
Where affordable housing is proposed together with market rate housing, affordable housing units should be comparable in design, integrated into the whole development, and should match the tenure of the whole development.	Housing Element Policy 4.1.5, Mount Vernon Comprehensive Plan, 2016
Support both rental and ownership forms of affordable housing in a variety of types and sizes.	Housing Element Policy H-3.4, Anacortes Comprehensive Plan, 2016

Incentives or Requirements

Policy Text Quote	Source
Include a percentage of affordable housing within all new developments that include housing.	Housing Element Policy H 1.8, Spokane Comprehensive Plan, 2017
As part of any rezone that increases residential capacity, consider requiring a portion of units to be affordable to low- and moderate-income households.	Housing Policy HO-38, Redmond Comprehensive Plan, 2011
Maintain and explore enhancing regulatory incentives to encourage the production and preservation of affordable ownership and rental housing such as through density bonuses, impact fee reductions, permit fast-tracking, or other methods.	Housing Element Policy 4.1.6, Mount Vernon Comprehensive Plan, 2016
Provide incentives including density bonuses, parking reductions, and flexible design standards to developments that include a percentage of affordable units to households at 30%, 50%, and 80% of median income.	Housing Element – Housing Affordability: Policy 2, Wenatchee Urban Area Comprehensive Plan, 2014
Offer exemptions or reduced impact fees for construction of affordable housing units in qualifying developments.	Housing Policy HO-49, Redmond Comprehensive Plan, 2011
Create meaningful incentives to facilitate development of affordable housing in both residential and commercial zones, including consideration of exemptions from certain development standards in instances where strict application would make incentives infeasible.	Housing Element Policy H7, Shoreline Comprehensive Plan, 2012

Policy Text Quote	Source
Evaluate the adoption of zoning regulations targeted at otherwise market-rate developments that require or incentivize a minimum percentage of new dwelling units and/or lots that are created (whether multi-family or single-family) be income restricted.	Housing Element Policy 4.1.1, Mount Vernon Comprehensive Plan, 2016
Explore a variety and combination of incentives to encourage market rate and non-profit developers to build more units with deeper levels of affordability.	Housing Element Policy H8, Shoreline Comprehensive Plan, 2012
Consider developing an inclusionary zoning program as a means of increasing the City's affordable housing supply.	Housing Element Policy H-3.7, Anacortes Comprehensive Plan, 2016
Require that affordable housing achieved through public incentives or assistance remains affordable for the longest possible term.	Housing Element Policy H-38, Anacortes Comprehensive Plan, 2016
Consider mandating an affordability component in Light Rail Station Areas or other Transit-Oriented Communities.	Housing Element Policy H18, Shoreline Comprehensive Plan, 2012
Consider revising the Property Tax Exemption (PTE) incentive to include an affordability requirement in areas of Shoreline where it is not currently required, and incorporate tiered levels so that a smaller percentage of units would be required if they were affordable to lower income households.	Housing Element Policy H13, Shoreline Comprehensive Plan, 2012

Funding or Financing

Policy Text Quote	Source
Develop a housing assistance program that helps homeowners with low incomes with small remodeling projects to improve weatherization, increase sustainability, and provide accommodations for disabilities.	Housing Element Policy 2.7, Walla Walla Comprehensive Plan, 2018
Maintain a City housing trust fund for low- and moderate-income housing that is based on the number of affordable units needs to serve Redmond's projected population and job growth changes.	Housing Policy HO-51, Redmond Comprehensive Plan, 2011
Consider a housing levy to provide ongoing funding for affordable housing.	Housing Element Policy H-3.6, Anacortes Comprehensive Plan, 2016
Help educate builders about the availability of funding and incentive programs to promote the construction of affordable housing in Redmond.	Housing Policy HO-47, Redmond Comprehensive Plan, 2011
Use all available federal, state and county programs, as well as private and nonprofit options for financing affordable housing.	Housing Policy HO-53, Redmond Comprehensive Plan, 2011
Support the development of affordable housing development funding sources.	Housing Element Policy H 1.12, Spokane Comprehensive Plan, 2017
Support and expand low-income housing programs and public funding (e.g., the Housing Levy and HUD entitlement funds).	Housing Chapter Policy H-22, Bellingham Comprehensive Plan, 2016

Policy Text Quote	Source
Advocate for regional and state initiatives to increase funding for affordable housing.	Housing Chapter Policy H-27, Bellingham Comprehensive Plan, 2016

Prevent Barriers

Policy Text Quote	Source
Continue streamlining the regulatory review and building permit process and reviewing the cost of infrastructure improvements and their impact on housing costs.	Housing Chapter Policy H-24, Bellingham Comprehensive Plan, 2016
Periodically review and update the City's residential zoning regulations and design standards to promote quality development with timely and predictable outcomes.	Housing Chapter Policy H-44, Bellingham Comprehensive Plan, 2016
<p>Ensure that policies, codes and procedures do not create barriers to affordable housing opportunities. Ensure that existing regulations, procedures or practices do not increase the cost of housing without a corresponding public benefit. Strive to increase benefits to the community while lowering housing costs by periodically reviewing, at a minimum, the following areas for possible revision or amendment:</p> <ul style="list-style-type: none"> • Comprehensive plan policies • Zoning and subdivision regulation • Infrastructure requirements • Development standards • Building and fire codes • Administrative procedures • Processing times • Fees and exactions • Inspection procedures 	Housing Element Policy HS3M, University Place Comprehensive Plan, 2015
Craft regulations and procedures to provide a high degree of certainty and predictability to applicants and the community-at-large to minimize unnecessary time delays in the review of residential, permits applications, while still maintaining opportunities for public involvement and review.	Housing Policy HO-29, Redmond Comprehensive Plan, 2011
Evaluate barriers to achieving increased density in multifamily residential and mixed use zones and revise regulations if appropriate.	Housing Element Policy H-1.6, Anacortes Comprehensive Plan, 2016
Consider housing cost and supply implications of proposed regulations and procedures.	Housing Element Policy H4, Shoreline Comprehensive Plan, 2012
Consider modifying codes to maximize economical wood frame construction.	Housing Chapter Policy H-8, Bellingham Comprehensive Plan, 2016

Policy Text Quote	Source
Minimize unnecessary housing development costs through regulations and standards contained in the Zoning Code and other City regulatory documents that are balanced with and maintained in concert with public safety considerations and all other goals of the Comprehensive Plan and Zoning Code.	Housing Policy HO-48, Redmond Comprehensive Plan, 2011

VULNERABLE POPULATIONS AND HOMELESSNESS

Policy Text Quote	Source
Coordinate and collaborate with private agencies to ensure housing for people with special needs including seniors, people with physical and developmental limitation, victims of domestic violence, and homeless individuals and families.	Housing Element Policy 1.5, Walla Walla Comprehensive Plan, 2018
Continue to encourage and support the development of emergency, transitional and permanent supportive housing with appropriate on-site services for people with special needs and the homeless throughout the City and county. Moving people into permanent housing as quickly as possible should be a priority.	Housing Chapter Policy H-50, Bellingham Comprehensive Plan, 2016
Develop or amend and support codes and ordinances that allow for a continuum of care and housing opportunities for special needs populations in the same manner as standard housing.	Housing Element Policy H-2.1, Yakima Horizon 2040, 2017
Encourage opportunities for assisted housing for people with special needs by: a. Adopting land use policies and regulations that treat government-assisted housing and other low-income housing the same as housing of a similar size and density; b. Permitting group living situations, including those where residents receive such supportive services as counseling, foster care or medical supervision in accordance with State and Federal Laws; and, c. Encouraging developers and owners of assisted housing units to undertake activities to establish and maintain positive relationships with neighbors.	Housing Element Policy 5.1.1, Mount Vernon Comprehensive Plan, 2016
Through building and site plan codes, encourage the development, rehabilitation and adaptation of housing that responds to the physical needs of special populations.	Housing Element Policy H-2.2, Yakima Horizon 2040, 2017
Encourage and consider incentives for the dedication of a portion of housing in new projects to special needs housing.	Housing Chapter Policy H-48, Bellingham Comprehensive Plan, 2016

NOTE: "Treatment of residential structures occupied by persons with handicaps" is not a policy choice; it is a state law ([RCW 36.70A.410](#)). Housing needs assessment could pay attention to needs of specific groups, such as elderly and disabled residents, and support housing for those groups.

Special-Needs Housing

Policy Text Quote	Source
Include units that are affordable for low-income special need families in all housing developments.	Housing Element Policy H 1.23, Spokane Comprehensive Plan, 2017
Ensure that facilities and services to meet the health care, treatment, social service, and transit needs of households with special needs are part of housing development plans.	Housing Element Policy 5.1.6, Mount Vernon Comprehensive Plan, 2016
Support actions to secure grants and loans tied to the provision of special needs housing by agencies, private developers and nonprofit organizations.	Housing Policy HO-23, Redmond Comprehensive Plan, 2011
Work with agencies, private developers and nonprofit organizations to locate housing in University Place intended to serve the community's special needs populations, particularly those with challenges related to age, health or disability.	Housing Element Policy HS4A, University Place Comprehensive Plan, 2015
Facilitate housing for special needs populations dispersed throughout Vancouver and the region. Such housing may consist of residential-care facilities, shelters, group homes, or low-income housing, and should be located near transportation and other services such as health care, schools, and stores.	Housing Policy H-6, Vancouver Comprehensive Plan, 2011
Encourage, assist, and support social and health service organizations that offer housing programs for targeted populations.	Housing Element Policy H25, Shoreline Comprehensive Plan, 2012

Homeless Focus

Policy Text Quote	Source
Coordinate with the homeless housing task force to implement short and long-term activities as identified in the Plan to End Homeless in Chelan & Douglas Counties.	Housing Element – Coordination: Policy 3, Wenatchee Urban Area Comprehensive Plan, 2014
Work with other jurisdictions and health and social service organizations to develop a coordinated, regional approach to homelessness.	Housing Element Policy HS4I, University Place Comprehensive Plan, 2015
Support development of programs that offer assistance to persons identified as being homeless.	Housing Element Policy YKH 2.1, Yakima Horizon 2040, 2017
Foster and support partnerships that have proven to be successful in reducing homelessness, preventing homelessness and assisting the chronically homeless with needed care.	Housing Chapter Policy H-52, Bellingham Comprehensive Plan, 2016
Support the development of public and private, short-term and long-term housing and services for Shoreline's population of people who are homeless.	Housing Element Policy H29, Shoreline Comprehensive Plan, 2012

Policy Text Quote	Source
Encourage a strong network of emergency shelter resources for homeless and at-risk families with children, childless adults, unaccompanied youth, and victims of sexual and domestic violence.	Public Service Policy PS7.1, Olympia Comprehensive Plan, 2019 (other shelter/housing policies in Olympia's plan)

Aging Adults Focus

Policy Text Quote	Source
Provide for a variety of residential options for older adults in the community including aging in place, assisted living facilities, and age-restricted senior communities. Strategies include: <ul style="list-style-type: none"> Promote Universal Design and visitability standards to create new housing stock that allows aging in place. Review development regulations to address types of housing options allowed and permitting requirements for new construction and accessibility modifications to existing development. Recruit developers and offer incentives for creation of new senior-oriented residential options. 	Housing Policy HO-7, Ridgefield Comprehensive Plan, 2016
Support ways for older adults and people with disabilities to remain in the community as their housing needs change by encouraging universal design or retrofitting homes for lifetime use.	Housing Element Policy H-4.4, Anacortes Comprehensive Plan, 2016
Encourage the development of senior-friendly housing opportunities, particularly in areas near services and amenities.	Housing Element Policy H-4.2, Anacortes Comprehensive Plan, 2016
Encourage a range of housing types for seniors affordable at a variety of incomes, such as independent living, various degrees of assisted living and skilled nursing care facilities. Strive to increase opportunities for seniors to live in specialized housing.	Housing Element Policy HS4F, University Place Comprehensive Plan, 2015
Promote a range of housing types for seniors; e.g., adult family homes, skilled nursing facilities, assisted living, and independent living communities.	Housing Element Policy H-4.3, Anacortes Comprehensive Plan, 2016
Promote the use of universal design principles for new development or redevelopment housing projects.	Housing Element - Goal H-3, Policy A, Program 3, City of Ellensburg Comprehensive Plan, 2019

Surplus Land and Nonprofit Housing

Policy Text Quote	Source
Identify and catalogue real property owned by the City that is no longer required for its purposes and is suitable for the development of affordable housing for very-low to moderate income households.	Housing Element Policy 4.1.8, Mount Vernon Comprehensive Plan, 2016

Policy Text Quote	Source
Give priority to the use of surplus, publicly owned land for housing that provides for a range of household incomes, with an emphasis on encouraging housing for low-income families.	Housing Policy HO-54, Redmond Comprehensive Plan, 2011
Explore and identify opportunities for non-profit developers to build affordable housing.	Housing Element Policy Implementation 4.5, Fife Comprehensive Plan, 2005
Support non-profit agencies and public/private partnerships to preserve or develop additional housing for very low, low and moderate income households.	Housing Element Policy H-3.3, Anacortes Comprehensive Plan, 2016
Evaluate land owned by the City and other public entities for use for affordable housing utilizing a community land trust or similar type model.	Housing Element Policy H-3.9, Anacortes Comprehensive Plan, 2016
Encourage establishment and funding of a Community Affordable Land Trust to acquire land and build affordable housing within the urban area.	Housing Element – Coordination: Policy 1, Wenatchee Urban Area Comprehensive Plan, 2014
Explore and identify opportunities to reduce land costs for non-profit and for-profit developers to build affordable housing – consistent with CPP AH7.	... Housing Element Policy HS3K (sub-policies excluded), University Place Comprehensive Plan, 2015
Cooperate with nonprofit housing organizations and regional efforts to develop a long-term management strategy for creating and preserving existing subsidized affordable housing.	Housing Policy HO-42, Redmond Comprehensive Plan, 2011
Support organizations that construct, manage and provide services for affordable housing, including permanently affordable housing.	Housing Chapter Policy H-26, Bellingham Comprehensive Plan, 2016
Encourage self-help housing efforts in which people earn home equity in exchange for renovation or construction work, such as "sweat equity" volunteer programs.	Public Service Policy PS5.5, Olympia Comprehensive Plan, 2019
Pursue creative methods within existing programs, such as the City's transfer of development rights (TDR) program, impact fee waivers, ARCH Housing Trust Fund, and state enabling legislation for property tax relief, as a means to provide direct assistance to builders and leverage funds for construction of affordable housing.	Housing Policy HO-46, Redmond Comprehensive Plan, 2011

EQUITY, DISPLACEMENT AND INTEGRATION

Policy Text Quote	Source
Prevent discrimination and encourage fair and equitable access to housing for all persons in accordance with state and federal law.	Housing Element Policy HS2H, University Place Comprehensive Plan, 2015

Policy Text Quote	Source
Support fair and equal access to housing for all persons, regardless of race, religion, ethnic origin, age, household composition or size, disability, marital status, sexual orientation or economic circumstances.	Housing Chapter Policy H-15, Bellingham Comprehensive Plan, 2016
Participate in relocation assistance to low- and moderate-income households whose housing may be displaced by condemnation or City-initiated code enforcement.	Housing Policy HO-50, Redmond Comprehensive Plan, 2011
Enforce policies ⁴⁷ that provide financial and relocation help to people who are displaced from their homes as a result of construction and development projects using federal funds.	Public Service Policy PS8.5, Olympia Comprehensive Plan, 2019
Initiate and encourage equitable and inclusive community involvement that fosters civic pride and positive neighborhood image.	Housing Element Policy H21, Shoreline Comprehensive Plan, 2012
Strive to increase class, race, and age integration by equitably dispersing affordable housing opportunities. Discourage neighborhood segregation and the isolation of special needs populations.	Housing Element – Housing Equity: Policy 1, Wenatchee Urban Area Comprehensive Plan, 2014
When Community Development Block Grant or Housing and Urban Development-funded buildings are at risk of being converted to market-rate status, inform the tenants of any purchase and relocation options available. When possible, help the Housing Authority of Thurston County and non-profit organizations buy such housing.	Public Service Policy PS8.5, Olympia Comprehensive Plan, 2019
Encourage relocation assistance and replacement housing to be developed, where feasible, to help low-income households when displacement is unavoidable.	Housing Element Policy 4.2.2, Mount Vernon Comprehensive Plan, 2016

REGIONAL COORDINATION AND FAIR SHARE

Policy Text Quote	Source
Support the Fair Share Housing allocation process and work with other jurisdictions to monitor progress toward achieving agreed upon goals.	Public Service Policy PS5.2, Olympia Comprehensive Plan, 2019
Actively coordinate with public and private partners in efforts to meet regional housing needs.	Housing Chapter Policy H-14, Bellingham Comprehensive Plan, 2016
Partner with private and not-for-profit developers, social and health service agencies, funding institutions, and all levels of government to identify and address regional housing needs.	Housing Element Policy H31, Shoreline Comprehensive Plan, 2012

⁴⁷ Per section 104(d) of the Housing and Community Development Act of 1974 as amended, requiring the replacement of low- and moderate-income housing units that are demolished or converted to another use, in connection with a Community Development Block Grant project.

Policy Text Quote	Source
Coordinate with regional jurisdictions to develop a regional assessment and report to share in the responsibility for achieving a reasonable and equitable distribution of affordable housing to meet the needs of middle and lower income persons.	Housing Element – Coordination: Policy 4, Wenatchee Urban Area Comprehensive Plan, 2014
Work regionally and with other jurisdictions to jointly fund affordable housing.	Housing Element Policy 4.3.3, Mount Vernon Comprehensive Plan, 2016
Cooperate with King County, A Regional Coalition for Housing (ARCH), and other Eastside jurisdictions and housing agencies to assess housing needs, create affordable housing opportunities, and coordinate a regional approach to funding and meeting the housing needs of Eastside Communities.	Housing Policy HO-4, Redmond Comprehensive Plan, 2011
Improve coordination among the County and other jurisdictions, housing and service providers, and funders to identify, promote, and implement local and regional strategies that increase housing opportunities.	Housing Element Policy H28, Shoreline Comprehensive Plan, 2012
Strive to implement the City’s “fair share” of affordable housing units as outlined in the cooperative effort among Pierce County jurisdictions.	Housing Element Policy Implementation 5.1, Fife Comprehensive Plan, 2005
Encourage local and regional affiliations and alliances to provide affordable housing.	Housing Element Policy H-2.1, Anacortes Comprehensive Plan, 2016

DESIGN AND DEVELOPMENT STANDARDS

Policy Text Quote	Source
Require effective, but not unreasonably expensive, building designs and landscaping to blend multi-family housing into neighborhoods.	Housing Policy PL16.10, Olympia Comprehensive Plan, 2019
Develop design guidelines, standards or other measures to achieve the following benefits: A. Allow growth without sacrificing Anacortes’s unique small town character. B. Facilitate compatibility between existing and new housing. C. Integrate and connect multifamily developments with surrounding development to enhance a sense of community in neighborhoods. D. Allow for compatible integration of attached and detached accessory dwelling units in residential neighborhoods.	Housing Element Policy H-2.2, Anacortes Comprehensive Plan, 2016
Develop design guidelines to ensure that all new housing, including that for lower and middle income owners and renters, adheres to good standards of planning, design, and construction.	Housing Element Policy 2.3, Walla Walla Comprehensive Plan, 2018
Promote high quality design that is compatible with the overall style and character of established neighborhoods.	Housing Element - Goal H-1, Policy D, Program 1, City of Ellensburg Comprehensive Plan, 2019

Policy Text Quote	Source
Integrate new development, with consideration to design and scale that complements existing neighborhoods, and provides effective transitions between different uses and intensities.	Housing Element - Goal H-1, Policy A, Program 1, City of Ellensburg Comprehensive Plan, 2019
Allow "clustering" of housing compatible with the adjacent neighborhood to preserve and protect environmentally sensitive areas.	Housing Policy PL16.3, Olympia Comprehensive Plan, 2019
Encourage housing types and design that reinforce and enhance the character and scale of established neighborhood development patterns.	Housing Element Policy H-2.1, Anacortes Comprehensive Plan, 2016
Increase open space requirements for multi-family, high-density development. Locate required open space either on site or in public park space.	Housing Chapter Policy H-38, Bellingham Comprehensive Plan, 2016
Enhance the appearance of and maintain public spaces in residential areas.	Housing Policy H-5.2, Prosser Comprehensive Plan, 2018

Sustainable Housing

Policy Text Quote	Source
Plan for energy efficient housing that is designed to maximize use of renewable resources such as solar and wind power.	Housing Element Policy 2.5, Walla Walla Comprehensive Plan, 2018
Foster innovative housing and mixtures of housing types that preserve natural resources and consolidate open space (e.g., context-sensitive residential clustering).	Housing Chapter Policy H-40, Bellingham Comprehensive Plan, 2016
Encourage housing retrofits that make them more resilient to natural disasters and climate change, are more energy efficient, and provide healthier indoor environments, including good air quality.	Housing Chapter Policy H-37, Bellingham Comprehensive Plan, 2016
Encourage the use of long-lived, low-maintenance building materials; high-efficiency energy systems; and low impact development techniques that reduce housing lifecycle costs and provide better environmental performance consistent with the City's Climate Protection Action Plan.	Housing Chapter Policy H-41, Bellingham Comprehensive Plan, 2016
Encourage health-related improvements to older homes, including the removal of lead-based paint, asbestos, and other potentially harmful materials.	Housing Chapter Policy H-36, Bellingham Comprehensive Plan, 2016
Encourage adapting non-residential buildings for housing.	Housing Policy PL16.13, Olympia Comprehensive Plan, 2019

Historic Preservation

Policy Text Quote	Source
Support the preservation of Ellensburg's historically-significant housing through the City's historic preservation program, which maintains a list of historic properties and districts, and provides education and incentives.	Housing Element - Goal H-1, Policy D, Program 2, City of Ellensburg Comprehensive Plan, 2019
Encourage neighborhoods and property owners to identify high-integrity historic areas that should be protected through the local historic district program.	Housing Chapter Policy H-33, Bellingham Comprehensive Plan, 2016

TRACKING AND MONITORING

Policy Text Quote	Source
Track the provision of affordable housing units to assess whether an adequate supply of housing affordable to the county's lower income and special needs residents, as defined in the Housing Characteristics and Needs report for Snohomish County, is being provided.	Snohomish County HO Policy 4.B Objective HO 4.B
In support of countywide housing policies, the county shall seek partnerships with other jurisdictions, through the Alliance for Housing Affordability, the Housing Consortium of Everett and Snohomish County, Snohomish County Tomorrow and similar forums, to track the provision of housing by type and affordability. This effort will include an assessment of progress toward meeting the county's housing goals, including housing that addresses the needs of households within the Under 30% AMI, 30-50% AMI and 51-80% AMI segments, as projected in the current Housing Characteristics and Needs Report for Snohomish County.	Snohomish County HO Policy 4.B Policy 4.B.1
Based upon the monitoring and evaluation results from Policy 4.B.1, the county shall evaluate the effectiveness of its zoning regulations to produce housing developments that meet the diverse housing needs identified in the Housing Characteristics and Needs Report for Snohomish County.	Snohomish County HO Policy 4.B Policy 4.B.2
Provide a report annually to the City Plan Commission that monitors progress toward achieving the housing goals and includes recommended policy change if positive direction toward achieving the housing goals is not occurring.	Housing Element Policy H 2.5, Spokane Comprehensive Plan, 2017
Maintain a housing database to inform city officials and the public on the status of the City's housing market and effectiveness of Redmond housing policies and regulations.	Housing Policy HO-9, Redmond Comprehensive Plan, 2011
Monitor the City's housing affordability market, including housing demand by housing type across all income levels and in all neighborhoods, and report on the effectiveness of the City's housing affordability policies.	Housing Chapter Policy H-25, Bellingham Comprehensive Plan, 2016
Monitor housing supply, type and affordability, including progress toward meeting a proportionate share of the countywide need for affordable housing for very low-, low-, and moderate-income households.	Housing Element Policy H-6.2, Anacortes Comprehensive Plan, 2016

Policy Text Quote	Source
Assess the effectiveness in meeting housing demands and monitor the achievement of the housing policies not less than once every 5 years.	Housing Element Policy Implementation 3.1, Fife Comprehensive Plan, 2005
Monitor local data and routinely reassess and adjust policies, strategies and regulations to improve effectiveness of programs to meet local housing needs.	Housing Element Policy H-6.3, Anacortes Comprehensive Plan, 2016
Monitor the number, type, and affordability of housing units being built annually to ensure consistency with the number of planned housing units, particularly in Mixed-Use zones.	Housing Policy HO-10, Redmond Comprehensive Plan, 2011
Provide annual information on affordable homeownership and rentals in the City, including the operative definitions of affordable housing, criteria to qualify for local, state, and federal housing assistance, data on current levels of market-rate and affordable housing, demand for market-rate and affordable housing, and progress toward meeting market-rate and affordable housing goals.	Housing Policy PL16.14, Olympia Comprehensive Plan, 2019

Jurisdictions Examined for Appendix B:

Anacortes	Mount Vernon	Ridgefield	Vancouver
Bellingham	Olympia	Shoreline	Walla Walla
Ellensburg	Prosser	Spokane	Wenatchee
Fife	Redmond	University Place	Yakima

Appendix E: Federal and State Housing Policy History

Federal Housing Policy Timeline

1867: In New York City, the first tenement-law regulation in America is enacted to ban the construction of rooms without ventilators and apartments without fire escapes, while also requiring one toilet per 20 people. However, these regulations weren't often enforced until 1901 when the city passed the Tenement House Law, which mandated improved sanitary conditions, fire escapes and access to light.⁴⁸

1923: The first U.S. public-housing project is constructed in Milwaukee.⁴⁹

1926: The first significant effort in the country to offer any kind of subsidy for affordable housing when New York State passed the Limited Dividend Housing Companies Act.⁵⁰

1934: In response to the Great Depression, the National Housing Act established the Federal Housing Administration (FHA), which was created to guarantee loans and insure mortgages for single-family homes as well as private multi-family housing. At this time, America was primarily renters, with only four in 10 households owning homes. Mortgage loan terms were limited to 50% of the property's market value, with short three- to five-year repayment schedules that ended with a balloon payment.⁵¹

1937: The Wagner-Steagall Housing Act established the U.S. Housing Authority, the first federal agency devoted solely to housing, and a new Low-Rent Public Housing program. Originally intended to create public housing for families with low incomes, it required partnerships between federal, state and local governments.⁵² The U.S. Housing Authority gradually expanded from low-income housing projects to middle-class development in suburban areas during World War II.⁵³

"The federal government has been involved in providing housing assistance to lower-income households since the 1930s. In the beginning, the federal government played a role in supporting the mortgage market (through establishment of the Federal Housing Administration [FHA] and the government-sponsored enterprises) and in promoting construction of low-rent public housing for lower-income families through local public housing authorities (PHAs). Over time, the federal government has shifted away from providing construction-based subsidies toward providing rental subsidies, and private developers and property owners have been playing a larger role."

~Congressional Research Services, "Overview of Federal Assistance Programs and Policy," Overview section

⁴⁸ History.com Editors, "Tenements," (updated October 10, 2019; original April 22, 2010), <https://www.history.com/topics/immigration/tenements>.

⁴⁹ Milwaukee County Historical Society, "Daniel Hoan Collection," <https://milwaukeehistory.net/unlocking-the-vault/daniel-hoan-collection-text/>.

⁵⁰ The Nation, "151 Years of America's Housing History," (May 24, 2018), <https://www.thenation.com/article/archive/americas-housing-history/>.

⁵¹ U.S. Department of Housing and Urban Development (HUD), "The Federal Housing Administration (FHA)," https://www.hud.gov/program_offices/housing/fhahistory.

⁵² Congressional Research Service (CRS), "Overview of Federal Housing Assistance Programs and Policy," (Updated 2019), p.2, <https://crsreports.congress.gov/product/pdf/RL/RL34591>.

⁵³ National History Center, "Housing Policy in the United States," p. 3, <https://nationalhistorycenter.org/wp-content/uploads/2018/08/Housing-Policy.pdf>.

1942: "The Emergency Price Control Act establishe[d] federal rent control for the first time. By January 1945, Scranton, Pennsylvania, [was] the only city of more than 100,000 residents with unregulated rents."⁵⁴

1944: The GI Bill provided mortgage-loan guarantees for home purchases by veterans.⁵⁵

1949: Following a post-war housing shortage, the Housing Act under Truman's Fair Deal bolstered the Housing Authority's budget and capabilities, allowing the federal government to undertake larger urban renewal projects (replacing slum properties with sites for redevelopment). The Housing Act of 1949 also reactivated the public housing program for families with low incomes (which was on hold during WWII), authorizing subsidies to low-income housing authorities to build housing.⁵⁶

1955: New York state began subsidizing the construction of moderate- and middle-income housing with the introduction of the Mitchell-Lama program that was created by the Limited Profit Housing Act. Under this program, over 105,000 apartments were generated after clearing formerly rundown parts of the city; today, about 45,000 apartments are left.⁵⁷

1959: "The Housing Act of 1959 (P.L. 86-372) was the first significant instance where government incentives were used to persuade private developers to build housing that would be affordable to low- and moderate-income households. As part of P.L. 86-372, Congress created the Section 202 Housing for the Elderly program. Through the Section 202 program, the federal government extended low-interest loans to private nonprofit organizations for the development of affordable housing for moderate-income residents age 62 and older." ⁵⁸

1960s: Various other housing acts (1961, 1965, 1968) further expanded the role of the private sector providing housing to multifamily housing of various income levels through the federal government insuring mortgages of private developers of multifamily housing and providing loans to developers at low interest rates (1961), providing rental assistance (1965) and subsidizing private developers' mortgage interest payments (1968).⁵⁹

1965: "The Department of Housing and Urban Development (HUD) was created in a largely symbolic move to bring housing and slum-clearance programs to the cabinet level."⁶⁰ It was created to manage public housing and its affairs, as the size of public housing had grown tremendously. FHA was encompassed within this new department.

1968: Congress passed the Fair Housing Act, which outlawed discrimination in housing and in mortgage lending and gave HUD enforcement responsibility. Up to this point, there had been years of governmental and

⁵⁴ The Nation, "151 Years of America's Housing History," (May 24, 2018), <https://www.thenation.com/article/archive/americas-housing-history/>.

⁵⁵ Ibid. (*The Nation*)

⁵⁶ CRS, "Overview of Federal Housing Assistance Programs and Policy," (Updated 2019), p. 3, <https://crsreports.congress.gov/product/pdf/RL/RL34591>.

⁵⁷ Kamping-Carder, Leigh, "Hit the NYC jackpot: How to get an affordable Mitchell-Lama apartment to call your own," (March 15, 2018), https://www.brickunderground.com/blog/2014/10/mitchell_lama_affordable_housing_guide.

⁵⁸ CRS, "Overview of Federal Housing Assistance Programs and Policy," (Updated 2019), p.3, <https://crsreports.congress.gov/product/pdf/RL/RL34591>.

⁵⁹ Ibid, p. 4. (*CRS*)

⁶⁰ The Nation, "151 Years of America's Housing History," (May 24, 2018), <https://www.thenation.com/article/archive/americas-housing-history/>.

private discrimination in the provision of housing, which limited minority households' opportunities to achieve homeownership and contributed to patterns of racial segregation.⁶¹

1969: "The Brooke Amendment, which was included as part of the Housing and Urban Development Act of 1969 (P.L. 91-152), limited tenant contributions toward rent in all rent assisted units (including public housing and all project-based rental assistance units) to an amount equal to 25% of tenant income (this was later raised to 30%). The Brooke Amendment is considered to be responsible for codifying an income-based rent structure in federal housing programs."⁶²

1970: The Housing and Urban Development Act of 1970 introduced the Federal Experimental Housing Allowance Program (EHAP). EHAP tested two different versions of housing allowances: the "demand experiment," between 1973 and 1976, and the "supply experiment," between 1974 and 1979. Before the research was complete, Congress moved ahead with legislation in 1974 to create the housing allowance program that we know today as the Housing Choice Voucher (HCV) program (see second 1974 entry on the Section 8 program below).⁶³

1973: The Nixon administration issued a moratorium on almost all subsidized-housing programs due to a number of concerns.⁶⁴

1974: The Community Development Block Grant (CDBG) Program was authorized under Title I of the Housing and Community Development Act of 1974, as amended. Prior to this time, numerous federal programs addressed community development issues. CDBG consolidated eight programs under which communities competed nationally for funds.⁶⁵

1974: The Housing and Community Development Act of 1974 also established Section 8 housing programs as a replacement for public housing, creating a tenant-based certificates program to increase low-income tenants' choice of housing. "Although the 1960s had seen rental assistance programs like Rent Supplement and Section 23, the scale of the Section 8 program made it the first comprehensive rental assistance program."⁶⁶

1976: "The Supreme Court rule[d], in *Hills v. Gautreaux*, that the Chicago Housing Authority contributed to racial segregation in Chicago through discriminatory practices. HUD [began] offering vouchers in the city to address poverty and segregation."⁶⁷

1977: The Community Reinvestment Act (CRA) "affirm[ed] that federally insured [banks] have an obligation to meet the credit needs of the communities in which they are chartered and accept deposits ... and require[d] federal banking regulators to assess the extent to which banks are meeting those needs. The enactment of the CRA grew out of concern that banking deposits were funding lending activities across the country at the

⁶¹ CRS, "Overview of Federal Housing Assistance Programs and Policy," (Updated 2019), p. 5, <https://crsreports.congress.gov/product/pdf/RL/RL34591>.

⁶² Ibid, p. 5. (CRS)

⁶³ HUD Edge, "Message from PD&R Leadership: Blast from the Past: How the Experimental Housing Allowance Program of the 1970s Can Inform the Moving to Work Expansion Today," <https://www.huduser.gov/portal/pdredge/pdr-edge-fm-asst-sec-032017.html>.

⁶⁴ CRS, "Overview of Federal Housing Assistance Programs and Policy," (Updated 2019), p. 6, <https://crsreports.congress.gov/product/pdf/RL/RL34591>.

⁶⁵ U.S. Department of Housing and Urban Development, "Basically CDBG," (2007), https://www.hud.gov/sites/documents/DOC_16470.PDF.

⁶⁶ CRS, "Overview of Federal Housing Assistance Programs and Policy," (Updated 2019), p. 6, <https://crsreports.congress.gov/product/pdf/RL/RL34591>.

⁶⁷ The Nation, "151 Years of America's Housing History," (May 24, 2018), <https://www.thenation.com/article/archive/americas-housing-history/>.

expense of providing credit in certain areas where deposits were collected, thereby contributing to neighborhood disinvestment."⁶⁸

1982: Under President Ronald Reagan, HUD's budget was slashed to under \$40 billion, a decrease of more than 50% from 1976, when it was \$83.6 billion.⁶⁹

1983: The Housing and Urban-Rural Recovery Act of 1983 (P.L. 98-181) limited HUD's authority to issue new Section 8 contracts to existing properties only, as the use of Section 8 in new construction and rehabilitation was found too expensive. "The act also created a new demonstration program to test a modified use of Section 8, referred to as vouchers. Vouchers were similar to the use of Section 8 rent subsidies in existing housing, but they provided more flexibility to public housing authorities, particularly by permitting families to pay more than 30% of their incomes in rent. The demonstration was made permanent in 1985."⁷⁰

1986: The Low Income Tax Credit (LIHTC) program was created as part of the Tax Reform Act of 1986, which remains the primary source of federal funding for low-cost housing today.⁷¹ Giving a large level of control over to states for the first time, the tax credits are allocated to states based on population. While states must prioritize projects to serve low-income populations, states have discretion in setting priorities as to how the credits will be used.⁷²

1987: Congress passed the Stewart B. McKinney Homeless Assistance Act, which included funding for several grants that states

Mid-1980s: "By the mid-1980s, federal housing programs had gone through a number of iterations. Some programs had been scrapped as inefficient, subject to fraud and abuse, or too expensive. Shifting federal priorities — toward reducing taxes and increasing military spending in response to the Cold War — reduced funding available for social programs, including housing assistance. Creation of assisted housing with federal funds was on the decline, with production slowing significantly between 1982 and 1988." In addition, existing affordable rental units were being lost as HUD contracts expired or owners chose to repay their low-interest mortgages and charge market rent.

Late 1980s through 1990s: State and local governments and other organizations began taking the initiative to develop housing within their communities as a result of reduced federal support for housing. "From the late 1980s through the 1990s, Congress acknowledged the value of local control and gave more decisionmaking authority over housing policy to state and local governments through the creation of block grants and tax credits."

~Congressional Research Services, "Overview of Federal Assistance Programs and Policy," p. 6-7

⁶⁸ CRS, "Overview of Federal Housing Assistance Programs and Policy," (Updated 2019), p. 5-6,

<https://crsreports.congress.gov/product/pdf/RL/RL34591>.

⁶⁹ The Nation, "151 Years of America's Housing History," (May 24, 2018), <https://www.thenation.com/article/archive/americas-housing-history/>.

⁷⁰ CRS, "Overview of Federal Housing Assistance Programs and Policy," (Updated 2019),

<https://crsreports.congress.gov/product/pdf/RL/RL34591>.

⁷¹ The Nation, "151 Years of America's Housing History," (May 24, 2018), <https://www.thenation.com/article/archive/americas-housing-history/>.

⁷² CRS, "Overview of Federal Housing Assistance Programs and Policy," (Updated 2019), p. 7,

<https://crsreports.congress.gov/product/pdf/RL/RL34591>.

and localities could use to assist people experiencing homelessness. Grants were available for permanent and transitional housing, as well as supportive services.⁷³

1990: Congress authorized the HOME Investment Partnership program through the National Affordable Housing Act of 1990, creating another large, flexible block grant program to states and localities. Funds were apportioned based on a formula and were to be used to assist families at or below 80% of area median income. Use of the funds was broad (including both homeowners/buyers or rental construction or assistance), and municipalities were required to establish plans for spending their funds, including matching requirements and partnerships with local nonprofits.⁷⁴

1992: "Congress authorize[d] the HOPE VI urban-revitalization demonstration program to provide grants to support low-rise, mixed-income housing rather than high-rise public housing to address a severe lack of funding for repairs. Atlanta use[d] its funds to clear slums and construct mostly private housing, an approach copied by cities across the country."⁷⁵

1996: President Clinton signed into law the Housing Opportunity Program Extension Act of 1996, which announced the "one strike and you're out" policy in public housing communities to ensure that tenants who partook in criminal or illegal drug use faced eviction. One year later, 75% of public housing authorities had One Strike policies in place.⁷⁶

1998: As concern over the condition of public housing grew, proposals for public housing reform were considered. After several years of debate, Congress approved public housing reforms through the Quality Housing and Work Responsibility Act (QHWRA) "to reduce segregation by race and income, encourage and reward work, bring more working families into public housing, and increase the availability of subsidized housing for very poor families."⁷⁷ QHWRA also featured the so-called 'Faircloth Amendment,' which prohibited the use of public housing funding for the development of any net new units of public housing.⁷⁸

2004: America's homeownership rate reached a record-high of 69%.⁷⁹

2005: HUD conducted its first official point-in-time count of homeless people in the country.⁸⁰

2007: The housing market crashed and nearly 3 million homes were foreclosed on in both 2009 and 2010.⁸¹ "During the 'Great Recession' of 2008-2013, FHA played an important countercyclical role, propping up the housing market to supply access to mortgage credit when other sources of financing were limited and the capital markets had seized up."⁸²

⁷³ Ibid, p. 7. (CRS)

⁷⁴ Ibid, p. 7-8. (CRS)

⁷⁵ The Nation, "151 Years of America's Housing History," (May 24, 2018), <https://www.thenation.com/article/archive/americas-housing-history/>.

⁷⁶ HUD, "Meeting the Challenge: Public housing authorities respond to the 'One Strike and You're Out' initiative," (September 1997), <https://www.ncjrs.gov/pdffiles1/Photocopy/183952NCJRS.pdf>.

⁷⁷ HUD, "The Federal Housing Administration (FHA)," https://www.hud.gov/program_offices/housing/fhahistory.

⁷⁸ CRS, "Overview of Federal Housing Assistance Programs and Policy," (Updated 2019), p. 8, <https://crsreports.congress.gov/product/pdf/RL/RL34591>.

⁷⁹ HUD, "Timeline," https://www.huduser.gov/hud_timeline/.

⁸⁰ The Nation, "151 Years of America's Housing History," (May 24, 2018), <https://www.thenation.com/article/archive/americas-housing-history/>.

⁸¹ Ibid. (The Nation)

⁸² HUD, "The Federal Housing Administration (FHA)," https://www.hud.gov/program_offices/housing/fhahistory.

2008: The Housing and Economic Recovery Act of 2008 was enacted in response to the subprime mortgage and national financial crisis. The act created the Federal Housing Finance Agency and improvements in federal regulation of mortgage lending institutions.

2010: "The Dodd-Frank Wall Street Reform and Consumer Protection Act (P.L. 111-203) instituted new rules related to mortgages intended to protect consumers and the financial system from some of the lending practices that preceded the financial crisis, among other reforms."⁸³

2012: "The Obama administration create[d] the Rental Assistance Demonstration program, which authorize[d] the transformation of public housing into private-sector Section 8 housing."⁸⁴

2012: "The Section 8 waiting lists stretch so long that nearly half of them are simply closed."⁸⁵

Today: "Today's federal housing assistance programs fall into three main categories: rental housing assistance, assistance to state and local governments, and assistance for homeowners. Most of these programs are administered by the Department of Housing and Urban Development (HUD). Current housing assistance programs include Section 8 vouchers and project-based rental assistance, public housing, housing for the elderly (Section 202), housing for persons with disabilities (Section 811), rural rental assistance (the United States Department of Agriculture's Section 521 program), Community Development Block Grants (CDBG), HOME Investment Partnerships Block Grants, Low-Income Housing Tax Credits (LIHTC), homeless assistance programs, Federal Housing Authority (FHA) and Department of Veterans Affairs mortgage insurance, and the mortgage interest deduction in the tax code."⁸⁶

"Most federal housing assistance programs are aimed at making housing affordable for low-income families. Affordability — defined as housing that costs no more than 30% of a family's income — is considered to be the largest housing problem today. Rental assistance programs, which are the largest source of direct housing assistance for low-income families, all allow families to pay affordable, income-based rents; however, different forms of assistance target different types of households including the elderly, persons with disabilities, and families with children."⁸⁷

Housing Policy in Washington State

This section covers notable housing policy milestones in Washington state, with a focus on land-use policies or those policies that contribute extensively to affordable housing. Additional policies, including financial policies, can be found in the report titled "[There's No Place Like Home... Because There's No Place Like Washington! Summary of Washington State Housing-Related Legislation](#)" (2019) by the Washington State Housing Finance Commission.

⁸³ CRS, "Overview of Federal Housing Assistance Programs and Policy," (Updated 2019), p. 9, <https://crsreports.congress.gov/product/pdf/RL/RL34591>.

⁸⁴ The Nation, "151 Years of America's Housing History," (May 24, 2018), <https://www.thenation.com/article/archive/americas-housing-history/>.

⁸⁵ Ibid. (*The Nation*)

⁸⁶ CRS, "Overview of Federal Housing Assistance Programs and Policy," (Updated 2019), Overview, <https://crsreports.congress.gov/product/pdf/RL/RL34591>.

⁸⁷ CRS, "Overview of Federal Housing Assistance Programs and Policy," (Updated 2019), Overview, <https://crsreports.congress.gov/product/pdf/RL/RL34591>.

1939: Public Housing Authorities (RCW 35.82) - In the late 1930s and early 1940s, Washington authorized the creation of public housing authorities in response to an appeal from the federal government to give greater access to affordable housing to residents.⁸⁸

1981: Rent Control (RCW 36.01.130) - Rent control is prohibited.

1982: Creates and Supports Homeless Shelters (Operating Budget) - The state committed a \$1 million appropriation for operating support of homeless shelters, the first commitment of public funds for housing in Washington state by the Legislature. Today, the Legislature continues to support homeless shelters through funding sources including the Emergency Shelter Assistance Program (ESAP), Emergency Shelter Homeless Prevention (ESHP) and Overnight Youth Shelter (OYS) programs.⁸⁹

1982: Real Estate Excise Tax 1 (RCW 82.46.010) - Cities and counties were given the option of levying a local 0.25% real estate excise tax (REET) to pay for capital projects. "If a county imposes this tax, it is applied within the unincorporated areas only. This tax may be imposed by the legislative body and does not require voter approval. Almost all cities, towns, and counties in the state have imposed REET 1, with the exception of a few very small jurisdictions. [These] REET 1 revenues are restricted and may only be used for certain purposes. However, the exact purposes depend on the jurisdiction's population and whether or not it is fully planning under the Growth Management Act (GMA)."⁹⁰

1983: Washington State Housing Finance Commission (RCW 43.180) - Washington became one of the last states to establish a housing finance agency, amidst a recession that included high unemployment and mortgage interest rates exceeding 20%. Housing advocates, lenders and businesspeople worked together to establish the commission as a public-private partnership with the intention of helping the economy.⁹¹

1986: Housing Trust Fund Created (E2SSB 4626; RCW 53.185 & 43.185A) - The Housing Trust Fund and the Housing Assistance Program were "created 'to assist low and very low-income citizens in meeting their basic housing needs.' In 1991, the Housing Trust Fund was expanded to include the Affordable Housing Program, serving households at or below 80% of area median income and creating down payment assistance opportunities. Opened with a \$1 million investment in 1986, the Washington Housing Trust Fund (HTF) has become the primary vehicle for the state's direct investment in affordable housing. The HTF supports the construction, acquisition or rehabilitation of more affordable housing every two years when fully funded; creates rental and homeownership opportunities in every region of the state for low-income people (more than 70% of units serve extremely low-income people); and supports special needs housing for clients of the Department of Social and Health Services and the Department of Health."⁹²

1990: Growth Management Act (SHB 2929; RCW 36.70A) - The Growth Management Act (GMA) is a series of state statutes that required fast-growing cities and counties to develop a comprehensive plan to prepare for and manage their population growth. Comprehensive plans must address 13 goals, including affordable

⁸⁸ Washington State Housing Finance Commission (WSHFC), "There's No Place Like Home... Because There's No Place Like Washington!" (July 1, 2019), p. 54, <http://wshfc.org/admin/LegislationSummary.pdf>.

⁸⁹ Ibid, p. 54. (WSHFC)

⁹⁰ MRSC, "Real Estate Excise Tax" (last updated January 19, 2021), <http://mrsc.org/Home/Explore-Topics/Finance/Revenues/Real-Estate-Excise-Tax.aspx>.

⁹¹ Washington State Housing Finance Commission (WSHFC), "There's No Place Like Home... Because There's No Place Like Washington!" (July 1, 2019), p. 54, <http://wshfc.org/admin/LegislationSummary.pdf>.

⁹² Ibid, p. 53. (WSHFC)

housing.⁹³ Within the comprehensive plans, counties that are required to or have elected to plan must develop housing policies to ensure there is adequate housing for the future.

1993: Authorizing Conversion of Surplus Public Property to Use for Affordable Housing (EHB 1824; Amending RCW 43.63A.510, 36.34.135, and 47.12.063) - "With concern that local governments and school districts may have under-utilized land and buildings, the Legislature directed the Department of Community Development to work on an inventory of state-owned land and buildings for possible lease as sites for affordable housing. In doing so, this act provides a centrally located inventory of state and publicly owned land and buildings that may be suitable to be marketed, sold, leased, or exchanged for the development of affordable housing; and encourages an effective use of publicly owned surplus property."⁹⁴

1993: Housing Policy Act and the Affordable Housing Advisory Board (SB 5584; RCW 43.185B.020, RCW 43.63A) - The Housing Policy Act established "the policy base for the state's involvement in housing" and created the Affordable Housing Advisory Board (AHAB) to advise the Department of Commerce on housing policy issues. With a broad board of 19 representing various public and private housing interests, the group studies housing issues and recommends solutions. "Their recommendations have become the basis for countless pieces of successful housing legislation."⁹⁵ This act also established that local governments shall allow accessory apartments or accessory dwelling units in cities over 20,000 and counties over 125,000 in population.

1993: Mobile Home Landlord Tenant Act (SB 5482) - Allowed a qualified mobile home park tenant organization consisting of 60% of tenants to have the opportunity to purchase the park should the park be put up for sale. The tenant organization must provide a fully executed purchase sale agreement to the owner with 1% of the purchase price within 90 days.⁹⁶

1995: Property Tax Exemption Supports Urban Housing Projects (2SSB 5387; RCW 84.14.020) - "The Legislature granted a 10-year property tax exemption for urban housing preservation and renewal projects in locally designated areas. The exemption created an incentive for housing developers to acquire and rehabilitate abandoned buildings or construct new apartments in dilapidated urban centers, bringing residents back downtown. The exemption is an economic development tool for local governments to attract multifamily rental and ownership housing in neighborhoods targeted for growth. The program was for cities with populations above 50,000."⁹⁷ This law has had multiple modifications over the years (1997 through SB 6094; 2000 through HB 2505; 2002 through SHB 2466; key changes in 2007 through E2SHB 1910 to create the current eligibility for cities and the current eight- and 12-year tax exemptions; 2012 through SB 6277) and has become what today is often referred to as the Multi-Family Tax Exemption (MFTE) program.

1997: Growth Management Modifications, including Review and Evaluation or Buildable Lands Program (ESB 6094, RCW 36.70A.215) - A number of modifications to the Growth Management Act (GMA) were enacted in 1997, including the Review and Evaluation Program under [RCW 36.70A.215](#), which is often referred to as the Buildable Lands Program. The Buildable Lands Program "require[d] that Clark, King, Kitsap, Pierce, Snohomish, Thurston and Whatcom (as of 2017) Counties and the cities within them complete a Buildable Lands report

⁹³ MRSC, "Growth Management Act" (last updated January 15, 2020), <http://mrsc.org/Home/Explore-Topics/Planning/General-Planning-and-Growth-Management/Comprehensive-Planning-Growth-Management.aspx>.

⁹⁴ Washington State Housing Finance Commission (WSHFC), "There's No Place Like Home... Because There's No Place Like Washington!" (July 1, 2019), p. 51, <http://wshfc.org/admin/LegislationSummary.pdf>.

⁹⁵ Ibid, p. 52. (WSHFC)

⁹⁶ Ibid, p. 52. (WSHFC)

⁹⁷ Ibid, p. 50. (WSHFC)

every eight years. The Buildable Lands reports are a look back at actual development to determine if cities and counties have designated adequate amounts of residential, commercial and industrial lands to meet the growth needs incorporated in their comprehensive plans. ... Guidelines for local governments were adopted in 2000 and technical summaries were prepared and issued in 2003 and 2007. In 2017 a number of changes were made to the Review and Evaluation Program through [E2SSB 5254](#).⁹⁸

1998: Public Housing Authorities (HB 2175; Amending RCW 35.82) - This law gave the Housing Finance Commission "compliance and enforcement abilities by allowing it to impose covenants running with the land."⁹⁹

1999: Nonprofit Multifamily Low-income Rental Properties Exempt from Property Taxes (HB 1345; RCW 84.36.560)

2002: Real Estate Excise Tax for Affordable Housing (SB 5965; Adding a new section to 82.46 RCW) - "An additional real estate excise tax [was] authorized for counties equal to 0.5 percent of the selling price to be used exclusively for the development of affordable housing, including the acquisition, building, rehabilitation, maintenance and operation of housing for very low, low- and moderate income persons and those with special needs."¹⁰⁰

2002: Low Income Housing \$10 Surcharge - The Affordable Housing for All Surcharge (HB 2060; RCW 36.22.178) - "Recognizing the need for additional housing resources, and also understanding that affordable rents for extremely low-income people are not sufficient to cover the cost of building operations and maintenance, in 2002 the Legislature established a \$10 document recording fee to support both the development and operation of affordable housing. At the county level, this funding supports a variety of affordable housing needs for households at or below 50% of area median income. At the state level, fees are used to provide Operating and Maintenance (O&M) grants to subsidize the cost of serving households at or below 30% of area median income."¹⁰¹ This surcharge was renamed in 2007 (E2SHB 1359) as the Affordable Housing for All Surcharge.

2004: Manufactured Homes Regulation (SB 6593) - "This law require[d] that cities and counties must regulate manufactured homes built to federal manufactured housing construction standards no differently than they regulate other types of homes."¹⁰² See [RCW 35.21.684](#), [RCW 35A.21.312](#) and [RCW 36.01.225](#).

2005: Homeless Housing Task Force (SSB 5787; adding a new Chapter to section 43 RCW) - "Created a homeless housing task force in each county to develop a ten-year plan addressing short- and long-term housing solutions for the homeless; provided guidelines and other conditions for participation or opting out."¹⁰³

2005: Homeless Housing and Assistance Act (E2SHB 2163; RCW 43.185C) - Created with a goal to reduce homelessness, this act created a requirement for a statewide homeless housing strategic plan with

⁹⁸ Washington State Department of Commerce, "Buildable Lands Program Overview." <https://www.commerce.wa.gov/serving-communities/growth-management/growth-management-topics/buildable-lands/>.

⁹⁹ Washington State Housing Finance Commission (WSHFC), "There's No Place Like Home... Because There's No Place Like Washington!" (July 1, 2019), p. 48, <http://wshfc.org/admin/LegislationSummary.pdf>.

¹⁰⁰ Ibid, p. 44-45. (WSHFC)

¹⁰¹ Ibid, p. 43. (WSHFC)

¹⁰² MRSC, "Local Land Use Regulation of Manufactured Housing," (last modified July 2, 2018), <http://mrsc.org/Home/Explore-Topics/Planning/Development-Regulations/Local-Land-Use-Regulation-of-Manufactured-Housing.aspx>.

¹⁰³ Washington State Housing Finance Commission (WSHFC), "There's No Place Like Home... Because There's No Place Like Washington!" (July 1, 2019), p. 42, <http://wshfc.org/admin/LegislationSummary.pdf>.

performance measures and goals to reduce homelessness. Thirty-seven counties also participate and create their own local homeless housing plans. "The Homeless Housing and Assistance Program is funded by a \$10 surcharge for certain documents recorded by the county auditor. The Homeless surcharge generates around \$16 million each year to support programs. Of that \$10 surcharge roughly 60% remains at the county level and 40% are deposited into the state Home Security Fund. The Department of Commerce uses these funds to create the statewide homeless housing strategic plan, administer the Homeless Housing and Assistance program, measure program performance, provide technical assistance to local governments, and manage the homeless housing grant program."¹⁰⁴

2006: Inclusionary Zoning Bill (ESHB 2984; Amending RCW 82.02 and adding a section to 36.70A RCW) -

"Jurisdictions fully planning under the Growth Management Act may enact or expand affordable housing incentive programs providing for the development of low-income housing units through development regulations under certain income guidelines and other conditions (commonly referred to as the "inclusionary zoning bill").¹⁰⁵

2007: Affordable Housing Land Acquisition Program (2SHB 1401; RCW 43.185A.110) - Affordable Housing Land Acquisition Program (LAP), appropriated to the Department of Commerce to be administered by the Washington State Housing Finance Commission (HFC), was created as a revolving loan fund to meet the challenge of low-income housing developers obtaining funds quickly enough to purchase and hold land for affordable housing development.¹⁰⁶

2007: Affordable Housing for All Surcharges (ESHB 1359; RCW 36.22.1791) - "This bill added an additional \$8 document recording fee surcharge to support low-income housing projects. Counties must use their funds (90% of the total funds collected) for housing activities which directly accomplish the goals of the county's local homeless housing plan. The portion of revenue due to the state (10%) is remitted to the Home Security Fund and the Department of Commerce uses these funds to provide housing and shelter for extremely low-income households and for program administration, housing and shelter assistance for homeless persons, and the Homeless Housing Grant Program."¹⁰⁷

2008: The Rapid Response Loan Program (EHB 3142; RCW 43.185A.210) - Similar to the Affordable Housing for All program (2007), this local program was created "to quickly assist Washington nonprofit organizations purchase real property (including land, buildings or mobile home parks) for the preservation or development of affordable housing and community facilities. ... Applicant properties must be located in rapidly gentrifying or redeveloping areas, or in communities with a significant low-income population that is threatened with displacement."¹⁰⁸

2008: Protecting Apartment Dwellers in the Event of "Condominium Conversions" (SHB 2014; RCW 64.34.440) - This program gave existing apartment tenants 120-day notice in the event of a condominium conversion. With this program, the Legislature recognized the right of property owners to convert properties, but sought a balance with renters' well-being.¹⁰⁹

¹⁰⁴ Ibid, p. 41. (WSHFC)

¹⁰⁵ Ibid, p. 40. (WSHFC)

¹⁰⁶ Ibid, p. 38. (WSHFC)

¹⁰⁷ Ibid, p. 37. (WSHFC)

¹⁰⁸ Ibid, p. 36. (WSHFC)

¹⁰⁹ Ibid, p. 35. (WSHFC)

2008: Protecting Manufactured/Mobile Home Communities (E2SHB 1621; RCW 59.20.300) - "E2SHB 1621 require[d] landlords [of manufactured housing communities] to alert the Department of Commerce and the community's tenants if their community is for sale. The bill also require[d] that landlords negotiate in good faith either with a tenant organization, a nonprofit organization, local government or Indian tribe interested in preserving the property for manufactured housing. The Legislature went further to incentivize landlords to consider such a sale by exempting sales to these groups from the state and local Real Estate Excise Tax (REET)."¹¹⁰

2009: Concerning Affordable Housing Incentive programs (EHB 1464; RCW 36.70A.540) - "Within the GMA, incentive programs were encouraged, in order to facilitate the construction of affordable housing within the larger context of urban planning and zoning. The key language in EHB 1464 is that it changed 'construction' to 'development.' In so doing, the bill changed the law to allow for incentives to be granted even where no new construction was occurring, but where low-income units were being developed (i.e., acquisition/rehab or converting market rate units to affordable units). It also allowed for greater flexibility regarding location of the units (in the general area, as opposed to in adjacent buildings) as well as the type of development within which the units are located. The bill also allowed for a mechanism by which individual jurisdictions could accept money or property from developers who chose not to build affordable housing within the areas designated for the incentive programs, so long as the jurisdiction deemed said payments to achieve a result equal to or better than providing the affordable housing itself."¹¹¹

2010: Homeless Camps on Church Properties (ESHB 1956; RCW 35A.21.360, RCW 36.01.290, RCW 35.21.915) - "ESHB 1956 authorized religious organizations to host temporary encampments for the homeless on any property owned or controlled by such organizations. It went further by precluding counties, cities and towns from enacting regulations that impose any conditions, other than those for health and safety concerns, upon religious institutions; imposing excessive fees for permitting the encampments; or requiring the religious institutions to obtain liability insurance for the encampments or from indemnifying the municipalities against such liability."¹¹² In 2020, this act was amended with [ESHB 1754](#) to institute additional limitations, public noticing requirements and safety precautions for these temporary encampments.

2012: Creating an exemption from impact fees for low-income housing (EHB 1398; RCW Amend RCW 82.02.060) - Twenty-eight of Washington's 39 counties, and the cities within those counties, are planning jurisdictions defined under the Growth Management Act. "Planning jurisdictions may impose impact fees on development activity as part of the financing of public facilities needed to serve new growth and development. These jurisdictions may provide an exemption for low-income housing and other development activities with a broad public purpose. These exemptions are not required to be paid from public funds other than impact fee accounts. The legislation stipulate[d] that a covenant must be recorded by the developer prohibiting the use of the property for anything other than low income housing."¹¹³

2016: Disposing tax foreclosed property to cities for affordable housing purposes (SSB 6337) - "Prior to disposing of tax-foreclosed property, the county legislative authority gives notice to any city in which any tax foreclosed property is located within 60 days of acquiring the property. This notice must offer the city the

¹¹⁰ Ibid, p. 34. (WSHFC)

¹¹¹ Ibid, p. 32. (WSHFC)

¹¹² Ibid, p. 30. (WSHFC)

¹¹³ Ibid, p. 24. (WSHFC)

opportunity to purchase property for the original minimum bid under RCW 84.64.080 plus any direct costs incurred by the county in the sale."¹¹⁴

2017: Clarifying the type of land eligible for purchase under the affordable housing land acquisition revolving loan program (HB 1616) - "The type of allowable land that loans may be made for, under the Affordable Housing Land Acquisition Revolving Loan Fund Program, is expanded to include vacant or improved land."¹¹⁵

2018: Expanding access to homeless housing and assistance (HB 1570) - An additional increase in real estate document recording fees helped an additional 11,500 people who are experiencing homelessness or at risk of homelessness access housing assistance and services. This surcharge for local homeless housing and assistance in RCW 36.22.179 "is the state's primary source for funding homelessness services and is split between the state and counties so local communities can quickly address their most pressing needs. The increase will generate approximately \$26 million each year to fight homelessness. Additionally, this bill remove[d] the expiration date on the fee so that communities have a permanent and reliable source of funding to reduce homelessness."¹¹⁶

2018: Tiny homes (HB 1085) - Gave "local governments the authority to modify minimum floor-space requirements to accommodate innovative forms of affordable housing."¹¹⁷

2019: Tiny home communities (ESSB 5383) - "Provide[d] that cities and counties may adopt ordinances regulating the creation of tiny house communities, including using the binding site plan method. They may not adopt ordinances that prevent entry or require removal of a tiny house with wheels used as a primary residence in a manufactured/mobile home community if the house contains at least one internal toilet and one internal shower unless these are provided by the community. The owner of the land must make reasonable accommodations for utility hookups in compliance with MHLTA. Tiny houses and tiny house communities are defined in the act and may be subject to certain standards and the State Building Code Council must adopt tiny house standards by the end of 2019."¹¹⁸

2019: An act relating to increasing urban residential building capacity (E2SHB 1923) - This act removed barriers to building affordable homes by providing incentives to local jurisdictions to increase housing supply and reduce barriers to developing housing. The act authorized grants to support cities developing and adopting action plan; "exempt[ed] from appeal under state SEPA and GMA certain non-project actions taken by cities to increase residential capacity; authorize[d] grants for certain cities that take certain actions to increase residential building capacity; direct[ed] the WA Center for Real Estate Research at University of Washington to prepare a biennial report on housing supply and affordability; establishe[d] minimum residential parking requirements in certain cities; and, create[d] a document recording fee to be deposited into the GMA Planning and Environmental Review Fund."¹¹⁹ This act also updated definitions for affordable housing and mandated that cities may not prohibit permanent supportive housing in areas where multifamily housing is permitted.

¹¹⁴ Ibid, p. 18. (WSHFC)

¹¹⁵ Ibid, p. 14. (WSHFC)

¹¹⁶ Ibid, p. 11. (WSHFC)

¹¹⁷ Ibid, p. 10. (WSHFC)

¹¹⁸ Ibid, p. 8. (WSHFC)

¹¹⁹ Ibid, p. 5. (WSHFC)

2019: An act relating to encouraging investments in affordable housing and supportive housing (SHB 1406) -

"This act authorize[d] the governing body of a county or city to impose a local sales tax, credited against the state sales tax, for affordable and supportive housing."¹²⁰

2019: Concerning affordable housing development on religious property (HB 1377) -

"Require[d] certain cities and counties engaged in comprehensive planning to allow an increased density bonus for certain affordable housing development on property owned or controlled by a religious organization."¹²¹

2019: An act relating to providing cities and counties authority to use real estate excise taxes to support

affordable housing and homeless projects (EHB 1219) - "Authorize[d] counties and cities required to plan or who are planning under the Growth Management Act to use real estate excise tax (REET 2) revenue for the planning, acquisition, construction, reconstruction, repair, replacement, rehabilitation, or improvement of facilities for persons experiencing homelessness and affordable housing projects until January 1, 2026."¹²²

¹²⁰ Ibid, p. 3. (WSHFC)

¹²¹ Ibid, p. 3. (WSHFC)

¹²² Ibid, p. 3. (WSHFC)



Washington State
Department of
Commerce

We strengthen communities

Guidance to address racially disparate impacts

Updating your housing element to address new requirements

LOCAL GOVERNMENT DIVISION
GROWTH MANAGEMENT
SERVICES

About this document

The Washington State Department of Commerce's Growth Management Services (GMS) team assists and guides local governments, state agencies and others to implement the Growth Management Act (GMA).

In 2021, the Washington Legislature changed the way communities are required to plan for housing. [House Bill 1220 \(HB 1220\)](#)¹ amended the GMA to require local governments to “plan for and accommodate” housing affordable to all income levels. This significantly strengthens the previous goal, which was to “encourage” affordable housing. In addition, new changes require local jurisdictions to examine racially disparate impacts, displacement, exclusion and displacement risk in housing policies and regulations and adopt policies to begin to undo the impacts.

This document is guidance for local governments on how to integrate the new requirements related to racially disparate impacts, displacement, exclusion and displacement risk (hitherto “racially disparate impacts”) in their housing element updates.

Organization of the guidance

This guidance is part of a suite of documents that guide local jurisdictions on how to update their housing elements:

- **Book 1: Establishing Housing Targets for your Community**
 - Guidance for Allocating Projected Countywide Housing Needs to Local Jurisdictions
 - Housing Needs Projection Methodology & Housing for All Planning Tool (HAPT)
 - Countywide Planning Policies*
- **Book 2: Guidance for Updating your Housing Element**
 - Updated Housing Element Requirements with HB 1220
 - Guidance for Evaluating Land Capacity to Accommodate all Housing Needs
 - Guidance for Making Adequate Provisions to Accommodate all Housing Needs
 - Housing Needs Assessment (see also [Guidance for Developing a Housing Needs Assessment](#)²)*
 - Housing Element Review*
 - Updating Goals and Policies*
 - Identifying Strategies to Implement Your Policies*
 - Adopting, Implementing and Monitoring Your Housing Element*
- **Book 3: Guidance to Address Racially Disparate Impacts (this document)**
 - Recommended Process
 - Step 1: Engage the Community
 - Step 2: Gather and Analyze Data
 - Step 3: Evaluate Policies
 - Step 4: Revise Policies
 - Step 5: Review and Update Regulations

¹ <https://lawfilesexternal.wa.gov/biennium/2021-22/Pdf/Bills/Session Laws/House/1220-S2.SL.pdf?q=20211209114015>

² <https://deptofcommerce.box.com/s/mop7xrzh170th1w51ezbag3pmne9adz>

**Items are from the Guidance for Updating Your Housing Element³ (2021, Commerce).*

For additional information on the GMA housing programs, please visit the [GMS Planning for Housing Webpage](#)⁴ or contact Anne Fritz, housing programs manager, at Anne.Fritz@commerce.wa.gov.

³ <https://deptofcommerce.app.box.com/s/ig3pd55wrngxaczjwnt6hv98ue8swaj6>

⁴ <https://www.commerce.wa.gov/serving-communities/growth-management/growth-management-topics/planning-for-housing/>

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Introduction

Washington state is facing a housing affordability crisis because housing production has not kept pace with population growth. The housing scarcity negatively impacts the economic, social and health wellbeing of all Washington households and communities. However, communities of color have been historically disadvantaged by housing policies and practices making them disproportionately harmed by housing scarcity. Today, communities of color experience higher rates of housing cost burden, substandard housing conditions and lower home ownership rates⁵ which has led to a generational wealth gap.

New requirements for housing planning

In 2021, the Washington State Legislature changed the planning requirements for housing through House Bill 1220 (HB 1220). The updated statute in RCW 36.70A.020(4) strengthened the Growth Management Act (GMA) housing goal from “encourage affordable housing” to “plan for and accommodate” housing affordable to all income levels. Local governments now must go beyond simply encouraging affordable housing and must actively “plan for and accommodate housing” affordable to all economic segments of the community.

In addition, the updated statute in RCW 36.70A.070(2) requires jurisdictions to address zoning that may have a racially disparate or exclusionary effect and address patterns of disinvestment. Local governments must also identify displacement risk and establish policies to prevent displacement or reduce the hardships caused by displacement.

Specifically, the new requirements in RCW 36.70A.070(2) state that jurisdictions must now adopt a housing element that:

(e) Identifies local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing, including:

(i) Zoning that may have a discriminatory effect;

(ii) Disinvestment; and

(iii) Infrastructure availability;

(f) Identifies and implement policies and regulations to address and begin to undo racially disparate impacts, displacement, and exclusion in housing caused by local policies, plans, and actions;

(g) Identifies areas that may be at higher risk of displacement from market forces that occur with changes to zoning development regulations and capital investments; and

(h) Establishes anti-displacement policies, with consideration given to the preservation of historical and cultural communities as well as investments in low, very low, extremely low, and moderate-income housing;

⁵ See the Department of Commerce report titled “Improving [Homeownership Rates for Black, Indigenous, and People of Color in Washington: Recommendations from the Homeownership Disparities Work Group](https://app.leg.wa.gov/ReportsToTheLegislature/Home/GetPDF?fileName=Homeownership%20Disparities%20Recommendations%20Report%20-%20FINAL%20-%20Sep2022_e0b6a028-62cf-478c-aa9b-52e5e5c66609.pdf)” (2022). https://app.leg.wa.gov/ReportsToTheLegislature/Home/GetPDF?fileName=Homeownership%20Disparities%20Recommendations%20Report%20-%20FINAL%20-%20Sep2022_e0b6a028-62cf-478c-aa9b-52e5e5c66609.pdf

equitable development initiatives; inclusionary zoning; community planning requirements; tenant protections; land disposition policies; and consideration of land that may be used for affordable housing.

The new requirements are not a statement against current communities in which there are racially disparate outcomes in housing, but an acknowledgement of the role land use policy has played in creating and institutionalizing race-based advantages and disadvantages. The statute uses the term “racially disparate” but does not identify protected groups based on race. This document uses the phrase “community of color” in reference to nonwhite identified people as well as “BIPOC,” which is a commonly used acronym for Black, Indigenous and people of color.⁶ [Appendix A: Zoning and race](#) provides an overview of the historical relationships between land use planning and racially disparate impacts.

About this guidance

This new guidance supports jurisdictions updating housing elements with the new requirements in two parallel efforts. First, Commerce developed data and guidance for updating regional planning processes to establish housing targets by income level for all Washington counties and allocating those targets to local jurisdictions. Additional guidance provides information on planning for the needed housing capacity and making adequate provisions to meet these needs. Second, this document addresses the new requirements related to racially disparate impacts, displacement, exclusion and displacement risk in housing (RCW 36.70A.070(2)(e–h)).

This guidance focuses on the long-range planning role of local jurisdictions, specifically the housing goals and policies established in the housing element. However, because housing and labor markets are regional in nature, regional coordination and accountability in allowing housing attainable to all economic segments of the community, inclusive of all races, will be necessary to undue racially disparate impacts.

Commerce engaged an advisory work group to develop the recommended methodology and create this guidance for the implementation of the racially disparate impacts portion of the housing element requirements. The work group included local planners from across the state representing diverse planning contexts (geography, community type and size) and planners with direct experience identifying racially disparate impacts and displacement risk. The goal of including local planners in the work group was to ensure that the guidance would be usable and helpful to planners updating comprehensive plans with the new requirements.

In addition to engaging local planners, the project team consulted with key experts including representatives of stakeholder organizations, regional planning bodies, affordable and fair housing advocates, and technical experts. Key experts were also asked to provide feedback on draft methodologies.

Principal definitions

HB 1220 added new terms in the housing element statute with subsections e-h above. Commerce developed definitions of these terms with a statewide stakeholder group of planners to create a common understanding of the undefined terms. Key terms from the statute are defined here, while the full list of definitions is included in the [Definitions](#) section at the end of this document.

⁶ For a discussion of the use of the term BIPOC, see Commerce’s report titled “Improving [Homeownership Rates for Black, Indigenous, and People of Color in Washington: Recommendations from the Homeownership Disparities Work Group](#)” (2022).

- **Displacement:** The process by which a household is forced to move from its community because of conditions beyond their control.
 - Physical displacement: Households are directly forced to move for reasons such as eviction, foreclosure, natural disaster or deterioration in housing quality.
 - Economic displacement: Households are compelled to move by rising rents or costs of home ownership like property taxes.
 - Cultural displacement: Residents are compelled to move because the people and institutions that make up their cultural community have left the area.
- **Displacement risk:** The likelihood that a household, business or organization will be displaced from its community.
- **Exclusion in housing:** The act or effect of shutting or keeping certain populations out of housing within a specified area, in a manner that may be intentional or unintentional, but which leads to non-inclusive impacts.
- **Racially disparate impacts:** When policies, practices, rules or other systems result in a disproportionate impact on one or more racial groups.

Recommended process

The GMA requires jurisdictions to identify local policies and regulations that result in racially disparate impacts, displacement and exclusion in housing. While on its face, a policy may appear race neutral, in practice, policies interact with the housing market and pervasive prejudice to create disadvantages for people of color. The disadvantages accumulate over time, leading to greater race-based discrepancies in who benefits from safe, stable and secure housing and who does not. This guidance supports local jurisdictions to identify and remove those policies and regulations that create and perpetuate inequitable housing outcomes regardless of the policies' intent.

Commerce recognizes that every community in Washington is different, and every planning jurisdiction will be starting their housing policy update from different places. Some have housing action plans that provide demographic and housing needs assessments; others may have conducted equity-focused efforts that can inform the update of the housing element. Each community also has a different set of resources in terms of data access, staff time and other variables that will shape their approach to updating their housing element.

This guidance provides a recommended methodology summarized in Exhibit 1. It offers a process, action items and checklists based on principles of equitable policy making to help jurisdictions demonstrate that it has taken reasonable steps to satisfy their GMA obligations.

Exhibit 1. Process for assessing racially disparate impacts



The recommended approach for addressing racially disparate impacts includes five steps:

- **Step 1 and throughout:** Engage the Community. Step 1 focuses on identifying the communities in your jurisdiction that may be experiencing disparate impacts, exclusion or displacement, specifically communities that identify as Black, Indigenous and people of color (BIPOC), and developing a program of community engagement to support your analysis and assessment of racially disparate impacts in your existing policies and regulations.
- **Step 2:** Gather and Analyze Data. Step 2 focuses on conducting analysis of data to assess racially disparate impacts, displacement and exclusion in housing, as well as identifying areas at risk of displacement. Community engagement can help interpret the findings from the data analysis and provide greater insight into the intersecting factors that may cause housing policies or regulations to have a racially disparate impact.
- **Step 3:** Evaluate Policies. Step 3 focuses on using insights gained from Step 1 and Step 2 to evaluate your existing housing policies and identify areas for which new policies and regulations may be warranted.
- **Step 4:** Revise Policies. Step 4 focuses on revising existing policies to reduce and undo the disparate impacts, displacement and exclusion in housing, as well as policies to prevent displacement.
- **Step 5:** Review and Update Regulations. Step 5 focuses on reviewing and updating regulations to achieve the goals and policies of the housing element.

After you complete Step 1 through Step 5, we recommend reviewing the checklist in Exhibit 2. This checklist asks questions that help you identify if you have completed items (e)-(h) of RCW 36.70A.070(2) consistent with the guidance in this document.

Exhibit 2. Racially disparate impacts process checklist

Step 1 and throughout: Engage the Community



- Did you **review historical factors** that may have had a racially disparate impact?
- Did you **review the results of previous engagement** efforts to acknowledge community input that was provided previously, identify gaps and inform engagement priorities?
- Did you **meet with representatives of communities** that have been subject to historical injustices, different racial identities or those most impacted by housing struggles? *
- Does your **public participation program provide opportunities** for impacted community members to influence the interpretation of data analysis, identify root causes and provide input on potential policy solutions?

Step 2: Gather and Analyze Data



- Did you look at **housing data broken down by race**?
- Did you determine whether there is **evidence of racially disparate impacts, displacement or exclusion in housing**?
- Did you conduct a **displacement risk assessment**?
- Did you **review the data with impacted community members** to hear their perspectives on the policies, regulations, actions or root causes driving the disparities in outcomes? *

Step 3: Evaluate Policies



- Did you **identify housing needs** and/or **racially disparate impacts, displacement or exclusions** in housing to inform your policy evaluation?
- Did you evaluate if there are **goals** to address identified racially disparate impacts, displacement and exclusion in housing?
- Did you establish an **evaluation framework** tied to your identified housing needs and racially disparate impacts, displacement and exclusions in housing from Steps 1 and 2?
- Did you evaluate existing policies for the **distribution of benefits and burdens**? *
- Did you systematically **evaluate all existing goals and policies** for how they may contribute to the identified housing needs and address and begin to undo racially disparate impacts, displacement and exclusion?

Step 4: Revise Policies



- Did you **engage impacted community members** in identifying new goals and policies? *
- Did you identify **policy and goal additions, alternatives or improvements** to address and begin to undo racially disparate impacts, displacement and exclusion?
- Did you include **anti-displacement policies** to support those who are most at risk of displacement?
- Did you review the policy updates for **consistency** with other parts of the comprehensive plan?
- Does the policy language **provide clear direction** for implementation including updates to development regulations, permitting processes, fee structures and programming decisions?
- Are the policies **clear in their intent** and provide clarity for measurement and tracking success?

Step 5: Review and Update Regulations



- Did you establish **guiding questions** for your review of regulations?
- Did you **review your regulations and programs** for how well they do or do not implement the policies developed in Step 4?
- Did you review **your regulations for their alignment with the goals of GMA**, countywide planning policies and other comprehensive plan goals?
- Did you **update your regulations to align with your comprehensive plan goals and policies** to address and begin to undo racially disparate impacts, displacement and exclusion?

Note: The asterisk (*) indicates key points for community input throughout the process.

Guidance for small communities

It is recommended that each planning jurisdiction follows each step and document its efforts, findings and conclusions. For communities for which reliable sociodemographic data estimates are not available due to community size or privacy concerns due to a small number of BIPOC households, planning jurisdictions should place a high degree of emphasis on qualitative methods for identifying potential disparate impacts, exclusions, displacement or emerging displacement risk. This may include interviews with public-serving institutions such as schools or local employers (grocery stores, local school staff, food services), reviews of available administrative data, or collecting original data through community surveys or "tell your housing story" testimonies.⁷

In addition, review the sociodemographic profile of neighboring jurisdictions or the county and consider how and why the demographic profile of your community differs. Are there land use policies or regulations that create an exclusionary effect? Does the neighboring community have resources or cultural anchors that make them more attractive to people of color? Alternatively, why does your jurisdiction have an underrepresentation of certain populations in the community and why? It is important to document your information gathering efforts and the input you receive, including qualitative inputs, as the basis for the conclusions you draw about disparate impacts, exclusions, displacement and displacement risk.

Step 1 and throughout: Engage the community

Staff may know of many existing planning challenges within their community but may not have a complete understanding of how a specific policy impacts communities within their jurisdiction differently. This is because many public participation processes may favor property owners even when a large proportion of the impacted community rents their housing. When the policy-making processes only include input from a portion of the community, the resulting policies are less likely to equitably distribute the benefits and burdens.

The following guidance can help jurisdictions identify key audiences, information and actions to address housing policies that may have a discriminatory effect and identify and implement policies and strategies to undo those effects. The recommended process should inform the design of the public participation program required as part of comprehensive planning under the GMA (RCW 36.70A.140).⁸ Community engagement should take place throughout the process to update your housing element, though your strategies and questions will likely evolve as you work through the steps.

Resources such as Puget Sound Regional Council's (PSRC's) [Equitable Engagement for Comprehensive Plans](#) (July 2022) and the [American Planning Association's Planning for Equity Policy Guide](#) (June 2019) provide strategies for improving community engagement to achieve greater equity in housing policy and outcomes.

⁷ See Whatcom Housing Alliance's "[Share your housing story](#)" effort. See: <https://whatcomhousingalliance.org/projects/shareyourstory/>.

⁸ "Each county and city that is required or chooses to plan under RCW 36.70A.040 shall establish and broadly disseminate to the public a public participation program identifying procedures providing for early and continuous public participation in the development and amendment of comprehensive land use plans and development regulations implementing such plans." ([RCW 36.70A.140](#))



Resources for Step 1: Engage the community

- Racial Restrictive Covenants Project ([University of Washington](https://depts.washington.edu/covenants/)⁹ and [Eastern Washington University](https://inside.ewu.edu/racial-covenants-project/)¹⁰)
- History & Social Justice's national register of [Sundown Towns](https://justice.tougaloo.edu/sundown-towns/)¹¹
- [Civil Rights & Labor History Consortium](https://depts.washington.edu/labhist/)¹² (University of Washington)
- History of redlining ([Mapping Inequality: Redlining in New Deal America](https://dsl.richmond.edu/panorama/redlining/#loc=7/47.594/-122.498&text=intro))¹³
- [HistoryLink.org](https://wisaard.dahp.wa.gov/)
- Local historical associations
- Local collections in public libraries
- Washington State Department of Archeology and Preservation [WISSARD](https://www.wisard.org/)¹⁴ directory of historical places
- Community elders or seniors¹⁵
- [U.S. Census Quick Facts](https://www.census.gov/quickfacts/fact/dashboard)¹⁶
- Tribal communities
- Community groups
- [Ethnic and cultural associations](https://www.ethnicheritagecouncil.org/about-ehc/who-we-are/)¹⁷
- Washington's [Secretary of State Charitable Organizations Registry](http://www.wsasc.org/cms/wp-content/uploads/2012/03/Washington-State-Senior-Organizations-2012.pdf)¹⁸
- PSRC [Equitable Engagement for Comprehensive Plans](https://www.psrc.org/media/5933) (July 2022)¹⁹
- [American Planning Association's Planning for Equity Policy Guide](https://planning-org-uploaded-media.s3.amazonaws.com/publication/download_pdf/Planning-for-Equity-Policy-Guide-rev.pdf) (June 2019)²⁰

Exhibit 3 provides an overview of recommended engagement activities and outputs related to the housing element update. Example engagement activities are further described below.

⁹ <https://depts.washington.edu/covenants/>

¹⁰ <https://inside.ewu.edu/racial-covenants-project/>

¹¹ The History & Social Justice webpage has a "Historical Database of Sundown Towns" webpage that includes a listing of Washington State sundown towns and cities that historically excluded certain races. The locations are identified with varying levels of evidence and certainty. The website describes the list for Washington as a work in progress. Click on the city or town name to see the certainty of the designation as a sundown town. <https://justice.tougaloo.edu/sundown-towns/>.

¹² <https://depts.washington.edu/labhist/>

¹³ <https://dsl.richmond.edu/panorama/redlining/#loc=7/47.594/-122.498&text=intro>

¹⁴ <https://wisaard.dahp.wa.gov/>

¹⁵ The Washington State Association of Senior Centers publishes a directory from across the state at <http://www.wsasc.org/cms/wp-content/uploads/2012/03/Washington-State-Senior-Organizations-2012.pdf>.

¹⁶ <https://www.census.gov/quickfacts/fact/dashboard>

¹⁷ The Ethnic Heritage Council of the Pacific Northwest can direct you to cultural organizations in your area.

<https://www.ethnicheritagecouncil.org/about-ehc/who-we-are/>

¹⁸ The Secretary of State's website has a list of all registered organizations in any city. <https://ccfs.sos.wa.gov/#/>

¹⁹ <https://www.psrc.org/media/5933>

²⁰ https://planning-org-uploaded-media.s3.amazonaws.com/publication/download_pdf/Planning-for-Equity-Policy-Guide-rev.pdf

Exhibit 3. Example engagement activities and outputs related to updating the housing element of the comprehensive plan

Step 1: Engage the community				
	Pre-engagement research	Public participation program	Engagement activities	Take action and report back
Activities	<ul style="list-style-type: none"> Review previous engagement reports Review community profile Identify historical patterns, events or actions that may have had a racially disparate effect Reach out to key community representatives 	<ul style="list-style-type: none"> Identify key audiences Establish engagement objectives Plan engagement strategies Identify techniques Account for the size of your community and scope of the work Identify partners Include strategies to reduce barriers to participation 	<ul style="list-style-type: none"> Implement your engagement strategies Update the summary of opportunities to contribute if it changes 	<ul style="list-style-type: none"> Share back how community input is being used Implement data-informed and community vetted policy solutions Establish methods for tracking the impacts of policy changes in locally relevant language
Outputs	<ul style="list-style-type: none"> Identified communities of interest Identified opportunities to build on existing relationships Information on where people are and opportunities for engagement 	<ul style="list-style-type: none"> A plan for how to reach your key audiences A roadmap for who will do what when A strategy for gathering information in a comprehensive and transparent way A comprehensive overview of opportunities for community input 	<ul style="list-style-type: none"> Early phase: Community input on housing needs, displacement pressure and mechanisms of exclusion Mid phase: Community information on housing challenges and opportunities Late phase: Community vetted policy options 	<ul style="list-style-type: none"> A list of interested parties and how to inform/engage them

Pre-engagement research: The engagement process begins with pre-engagement research to identify engagement priorities and opportunities. This can include reviewing previous engagement reports, recent coverage of housing issues in local media, interviews with community leaders and other background research on the racial history of the community to identify populations for which you want to assess racially disparate outcomes, displacement and exclusion in housing. At a minimum, review demographic data to identify racial subgroups in the community for which you will assess disparate outcomes in housing. The U.S. Census²¹ provides a compiled community profile with demographic information useful for identifying racial or ethnic groups in the community.

²¹ A high-level community profile is available for counties, cities and census designated places at the US Census website. A profile for a specific jurisdiction can be found by searching at https://data.census.gov/profile/United_States?g=0100000US.

In addition, reviewing the community's history for experiences that may shape access to housing—such as racially restrictive covenants, immigrant settlement patterns and racial trauma—can help identify populations to include in the public participation program and demographic groups to consider in the data analysis. Ask yourself:

- What are the local historical patterns, events or actions that may have had a racially disparate effect?
- Who has been subject to disproportionate housing impacts because of race?
- Who has been subject to displacement or exclusion?

A jurisdiction may extend its analysis of racial impacts to include ethnic groups²² such as Hispanic and Latino people and indigenous communities. Jurisdictions may also choose to examine communities defined by immigration status, language, historical communities or residents' role in the local economy such as agricultural workers or seasonal resort staff. A small jurisdiction, or a jurisdiction that is relatively homogenous, may identify only one community for which you will assess disparate impacts. A larger jurisdiction with a more diverse population may identify multiple communities for which it will assess disparate impacts.

Consultation with other institutions that serve the community—such as community-based organizations, health departments, local school districts or social services organizations—can help to identify and define populations in the community that may be underserved in housing or other critical services due to lack of available housing. Engagement with these populations may include activities that are beyond traditional outreach methods. Reviewing previous engagement reports can also help identify opportunities, preferences and other locally relevant information to inform the design of your public participation program.

Public participation program design: After conducting your pre-engagement research, you are ready to develop your public participation program design. The public participation program should include strategies to engage BIPOC community members. Your public participation program should strive to improve the policy makers' understanding of the challenges, barriers and root causes of racially disparate impacts. An understanding that is informed by the lived experience of those experiencing the disparate impact is critical to identifying policy solutions and regulatory changes that are responsive to community needs and achieving the intended goals of the comprehensive plan.

The public participation program should describe the racial or ethnic communities for which you will assess disparate impacts, engagement objectives, and strategies, and consider how to reduce the barriers to participation specific to BIPOC community members. Engagement strategies may include surveys, interviews, focus group and community meetings, and other strategies to gather information on the challenges, barriers and root causes behind behaviors and actions that drive disparate outcomes. Your engagement strategies may include partnering with local community-based organizations (CBOs) or community liaisons that can offer local knowledge and language and cultural expertise. Also consider and plan to reduce barriers to participation on behalf of impacted community members.

²² Race and ethnicity are concepts to describe a person's identity. The concepts are interrelated and can include characteristics such as skin color, nationality, language, religion, culture or customs. Race places greater emphasis on physical attributes that are assigned social meaning. Ethnicity puts greater emphasis on cultural aspects of a person's identity including their language, heritage, religion or customs. The U.S. Census collects information on what race people identify with and whether they identify as one of the following ethnicities: Hispanic or Latino or Not Hispanic or Latino.

Engagement activities: Your participation program should include engagement opportunities for the community to provide input in the recommended steps two through five. The overall checklist in Exhibit 2 indicates key points for community input throughout the process with the asterisk (*).

Report back: Finally, your overall strategy for community engagement should specify an intentional feedback approach so that you can report back the policy changes to community members that gave their time and input.



Checklist for Step 1: Engage the community

- Did you **review historical factors** that may have had a racially disparate impact? (e.g., restrictive covenants, immigrant settlement patterns, racial trauma or other community experiences that can affect housing or neighborhood choice) Document this information in Step 2.
- Did you **review the results of previous engagement efforts** to acknowledge community input that was provided previously, identify gaps in community participation and inform the engagement priorities?
- Did you **meet with representatives of communities** that have been subject to historical injustices, different racial identities or those most impacted by housing struggles?
- Does your **public participation program provide opportunities** for impacted community members to influence the interpretation of the data analysis, identify root causes and provide input on potential policy solutions?

Step 2: Gather and analyze data

Step two of the process is to gather and analyze data with regard to race. Using a variety of data sources and approaches, assess current housing patterns to determine if there is evidence of racially disparate impacts, displacement and exclusion in housing. The analysis should provide information on the nature, degree and related factors of disparate impacts, as well as identify areas at higher risk of displacement. This analysis will help you amend or add policies and regulations that can begin to undo racially disparate impacts, displacement, exclusion and displacement risk.

There is no standard way to analyze the data. We recommend analyzing each topic identified in the statute including:

- “racially disparate impacts,”
- “displacement” (that has happened),
- “exclusion in housing” and
- “displacement risk” (vulnerability to future displacement) (see the section on [definitions](#)).

A list of the most common data sources for this work is in [Appendix B](#). A document providing further technical guidance on the data measures that may be used to analyze the topics in statute is available in [Appendix C](#).

When conducting the analysis, **analyzing the data by race** is key to highlighting where disparities in housing exist and the magnitude of those disparities. It also provides a baseline from which progress can be measured. Communities may also choose to analyze the available data by ethnicity and/or income group, as well as other variables.

When presenting data by race it is important **to put the disparities into historical context** to show the systemic and structural forces that created those outcomes. Without context, the reader may attribute disparate outcomes to supposed problems of people of color, rather than problems with policies and structure. To create more just policies, we must have a better understanding of the root causes and other factors that drive poorer outcomes for people of color. The [Urban Institute](#) provides guidance and examples on putting disparities into their structural context.²³

RDI Data Toolkit

To support jurisdictions completing Step 2, Commerce has compiled information on community demographics and housing stock characteristics for each city and county in Washington with the support of BERK Consulting. Data will include racial composition, cost burden by race, rental affordability of housing units, household income by race and tenure by race.

The data supports jurisdictions in identifying racially disparate impacts and exclusion in their jurisdictions. [Data will be available in spring 2023](#) for the first periodic update jurisdictions (King, Pierce, Snohomish, and Kitsap counties), and on a rolling basis for remaining jurisdictions.

Assessing racially disparate impacts

Racially disparate impacts occur when policies, practices, rules or other systems result in a disproportionate effect on one or more racial groups. Jurisdictions should consider including several of the following measures in their data analysis to assess if there are racially disparate impacts in their community.

- Homeownership rates by racial and/or ethnicity groups
- Rates of housing cost burden by racial and/or ethnicity groups
- Rates of overcrowding (rate of more than one occupant per room) by racial and/or ethnicity groups
- Housing cost compared to median household income by racial and/or ethnicity groups²⁴
- Concentrations of racial groups in certain areas of the city with economic characteristics differing from the rest of the community (see guidance discussion on exclusion below)²⁵
- If available, results of fair housing testing or analysis of fair housing complaint data

It may take several measures to draw a conclusion about the presence and degree of racially disparate impacts in your community. Jurisdictions are not required to find a racially disparate impact; however, they are required to conduct a well-reasoned analysis of whether local policies and regulations have or are currently contributing to racially disparate impacts, displacement and exclusion in housing. Identifying existing racial disparities and reviewing those with impacted populations to interpret the results will provide a defensible

²³ The Urban Institute has resources and examples of placing disparities in their rightful context with more attention to bias and root causes of those disparities. See <https://www.urban.org/urban-wire/how-we-should-talk-about-racial-disparities>.

²⁴ The Washington Center for Real Estate Research publishes a quarterly estimate of housing affordability, which is the ability of a middle-income family to carry the mortgage payments on a median price home for each county in Washington state. An index close to 100 suggests a balanced housing market with homeownership options for middle-income households. A score below 100 suggests housing costs are outstripping household incomes. See <https://wcrer.be.uw.edu/housing-market-data-toolkit/>.

²⁵ More discussion and examples of segregation analysis is available in the section on [assessing exclusion in housing](#).

basis on which to conduct your policy evaluation and help develop new policies (Step 3 and Step 4). In addition, clarification of the root causes will help you identify policy solutions best tailored to local conditions.

In addition to the measures identified above, there are numerous measures of well-being that are related to where a person lives. Housing choice affects the schools that children attend, access to public transit and exposure to environmental hazards. Jurisdictions could consider including additional analysis of the following indirect measures or downstream effects of housing:

- Commute burdens by area, such as minutes traveled to work by either racial group or income group
- Differences in exposure to environmental health hazards by racial and/or ethnicity groups; this information is available in the [Washington Environmental Health Disparities Map](#)²⁶
- Life expectancy and health differences by neighborhood and race and/or ethnicity, which can be identified with the [Washington Environmental Health Disparities Map](#)
- Puget Sound Regional Council's [Opportunity Mapping](#)²⁷ provides an overall Opportunity Index score based on economic, education, health, housing and transportation factors
- Location in neighborhoods of transit, parks, jobs and services by racial and/or ethnicity groups
- Areas affordable to racial and/or ethnicity groups based on income
- Disparities in educational access or benefits

Exhibit 4 presents an example of analysis for the City of Lynnwood from the [Lynnwood Housing Action Plan Housing for All](#).²⁸ The data demonstrate a racially disparate impact in homeownership, particularly for Hispanic and Black or African American households. Further analysis demonstrated higher rates of residential crowding and lower household incomes for Hispanic and Black or African American households. These disparities reflect long-standing patterns caused by policies and systemic barriers that ensure adequate housing for white households, while negatively impacting housing security for communities of color. An analysis of impediments to Fair Housing Choice by the Snohomish County Urban County Consortium found lending disparities by race, with households of color having the lowest success rate obtaining home loans.²⁹

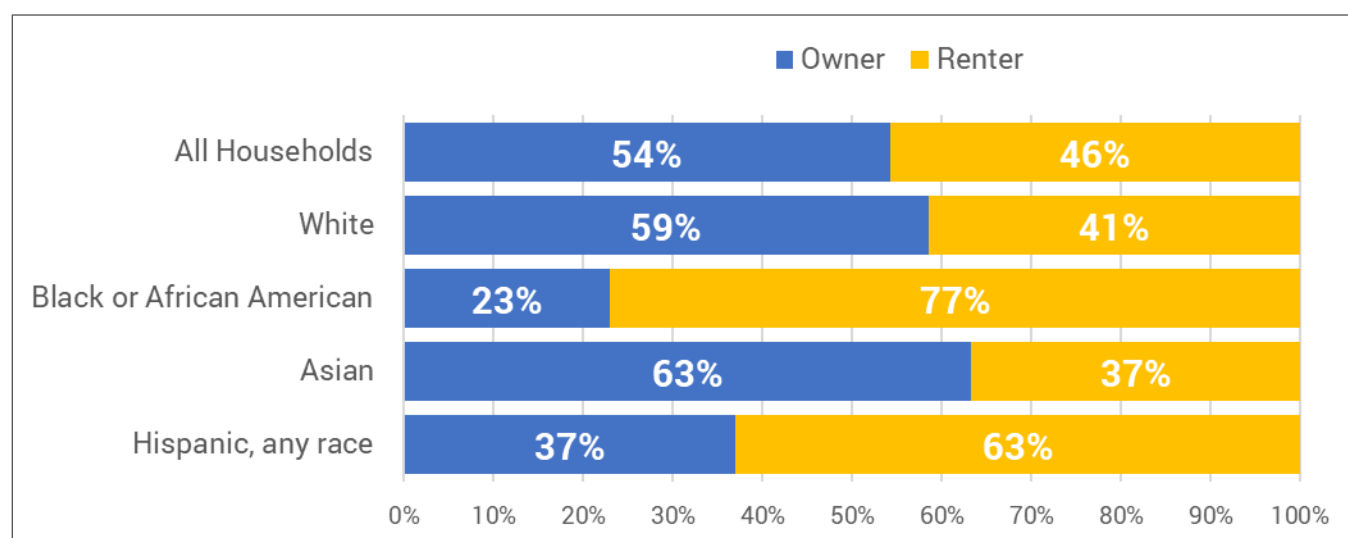
²⁶ <https://doh.wa.gov/data-and-statistical-reports/washington-tracking-network-wtn/washington-environmental-health-disparities-map>

²⁷ <https://www.psrc.org/our-work/opportunity-mapping>

²⁸ <https://www.lynnwoodwa.gov/Services/Apply-for-a-Permit/Planning-Zoning/Ongoing-Planning-Projects/Housing-Action-Plan>

²⁹ [2012 Analysis of Impediments to Fair Housing Choice](https://snohomishcountywa.gov/DocumentCenter/View/6579/Analysis-of-Impediments-to-Fair-Housing-Choice?bidId=) study by the Snohomish County Urban County Consortium.
<https://snohomishcountywa.gov/DocumentCenter/View/6579/Analysis-of-Impediments-to-Fair-Housing-Choice?bidId=>

Exhibit 4. Racially disparate impacts in homeownership, City of Lynnwood, 2018



Note: White, Asian and Black or African American households include both Hispanic and non-Hispanic ethnicity.

Sources: American Community Survey B25003, 2014-2018; BERK Consulting, 2020.

Assessing exclusion in housing

Exclusion is the act or effect of shutting or keeping certain populations out of housing within a specified area, in a manner that may be intentional or unintentional. Historically, racially restrictive covenants were a form of explicit exclusion. Exclusion did not end when federal courts found restrictive covenants unconstitutional. Regulations such as large lot zoning and lending practices, among other local, state and federal policies, all served to further segregation.³⁰ Exclusion may extend beyond race to income, ethnicity or other sociodemographic characteristics. Analysis of these other factors is not required but indicates areas where land use policies have had a segregating impact.

Assess exclusion by examining patterns of segregation; that is, identifying areas of the jurisdiction in which the population does not reflect the composition of the jurisdiction's population. When a jurisdiction appears homogenous, compare the composition of your jurisdiction to the larger region, such as the county or to neighboring cities. For example:

- **Example A:** If the city has a smaller proportion of communities of color than the county, then that suggests an exclusionary effect. Ask yourself, why are these communities of color not well represented in our jurisdiction? Gather public input, including from communities of color, to determine the root causes of that exclusionary effect—is it too few housing options in the jurisdiction or perhaps there is a cultural anchor in a neighboring jurisdiction? These root causes will help you identify effective policy solutions to reduce and undo exclusionary effects in policies and regulations.
- **Example B:** Comparing the workforce profile and the residential profile can also illuminate patterns of exclusion. Suburban cities may have largely expensive housing, while local employment is concentrated in lower-wage service jobs. In these cases, the jurisdiction should assess if there is adequate housing affordable to the local workforce, even when that workforce is small. If a community

³⁰ For a history of the role of public policy in racial segregation, see [The Color of Law: A forgotten history of how our government segregated America](#) (2017), by Richard Rothstein.

is benefitting from the convenience of a local grocery store, it is important to have housing accessible to people who work in grocery stores.

- **Example C:** If the demographic profile of a city reflects the county as well as the workforce, there may be no exclusionary effect based on race. Conducting a similar analysis based on income will help to identify or rule out exclusionary effects based on income.

Identify exclusion in housing through measures that assess:

- **Segregation**, which is the over- or under-representation of a group relative to the jurisdiction as a whole. Segregation creates disparate impacts by creating uneven access to resources, amenities and opportunities, and public and private disinvestment in local infrastructure leading to depreciated land values and eroding housing equity. There are a few common approaches to measuring segregation:
 - Analyzing the ratios of different groups of people between a smaller area, such as a census tract, and the whole jurisdiction. A location quotient is a type of this analysis.
 - Dissimilarity Index, which is a measure of the degree to which one group is separated from another. In its work on [racial residential segregation](#),³¹ PSRC provides a dissimilarity index analysis for the Puget Sound Region.
- **Concentration or dispersion of affordable housing** or housing choice voucher usage within the jurisdiction. When housing patterns or policies concentrate subsidized housing into a few areas, it may mean that low-income households have reduced choice and access to places of opportunity.³²
- **Comparison of the residential population** to the workforce population. This helps identify how well the local housing stock is serving the local workforce.

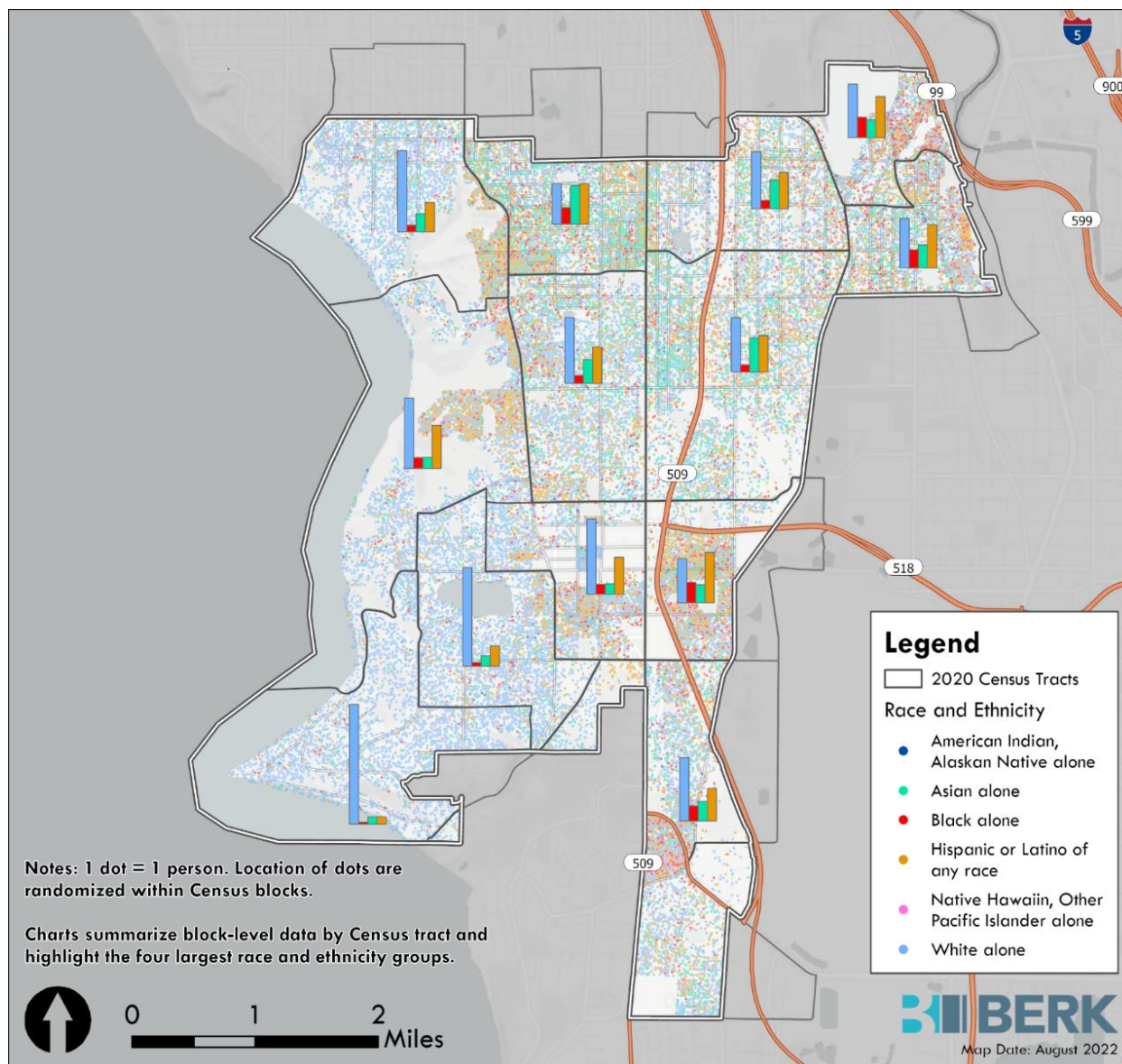
Exhibit 5 presents an example analysis of exclusion for the City of Burien based on 2020 U.S. Census data. The analysis uses a dot map³³ by census block group and summary histograms for census tracts. The analysis shows that people who identify as a race other than white are underrepresented in the southwest quadrant of the city. Many BIPOC communities live near state highways or major arterials. The areas with greater representation of BIPOC people are also the areas with higher residential density. This analysis demonstrates there are likely discriminatory effects of current housing policies when they prevent people of color from accessing some areas of the city. Additional analysis is needed to identify the specific processes of exclusion. Given the finding of an exclusionary effect, the policy analysis should assess existing policies and regulations for where they contribute to the exclusion of BIPOC households from the areas of the city in which they are underrepresented.

³¹ <https://www.psrc.org/our-work/racial-residential-segregation>

³² National Housing Preservation Database (NHPD) provides information on the federally assisted housing inventory (project-based subsidies) available at <https://preservationdatabase.org/>. Access to the database is free but requires registration. This data is focuses on building-level subsidies, but not Housing Choice Vouchers for use in privately owned housing. Both HUD's Affirmatively Furthering Fair Housing resources (<https://egis.hud.gov/affht/>) and Policy Map's free web version provides the ability to map federally supported housing. Chose a scale of analysis that is meaningful for your jurisdiction.

³³ [HUD's Affirmatively Furthering Fair Housing Tool](#) is a free online data-mapping tool that provides race and ethnicity dot density maps. Available at <https://egis.hud.gov/affht/>.

Exhibit 5. Example of assessment of exclusion, City of Burien, 2020

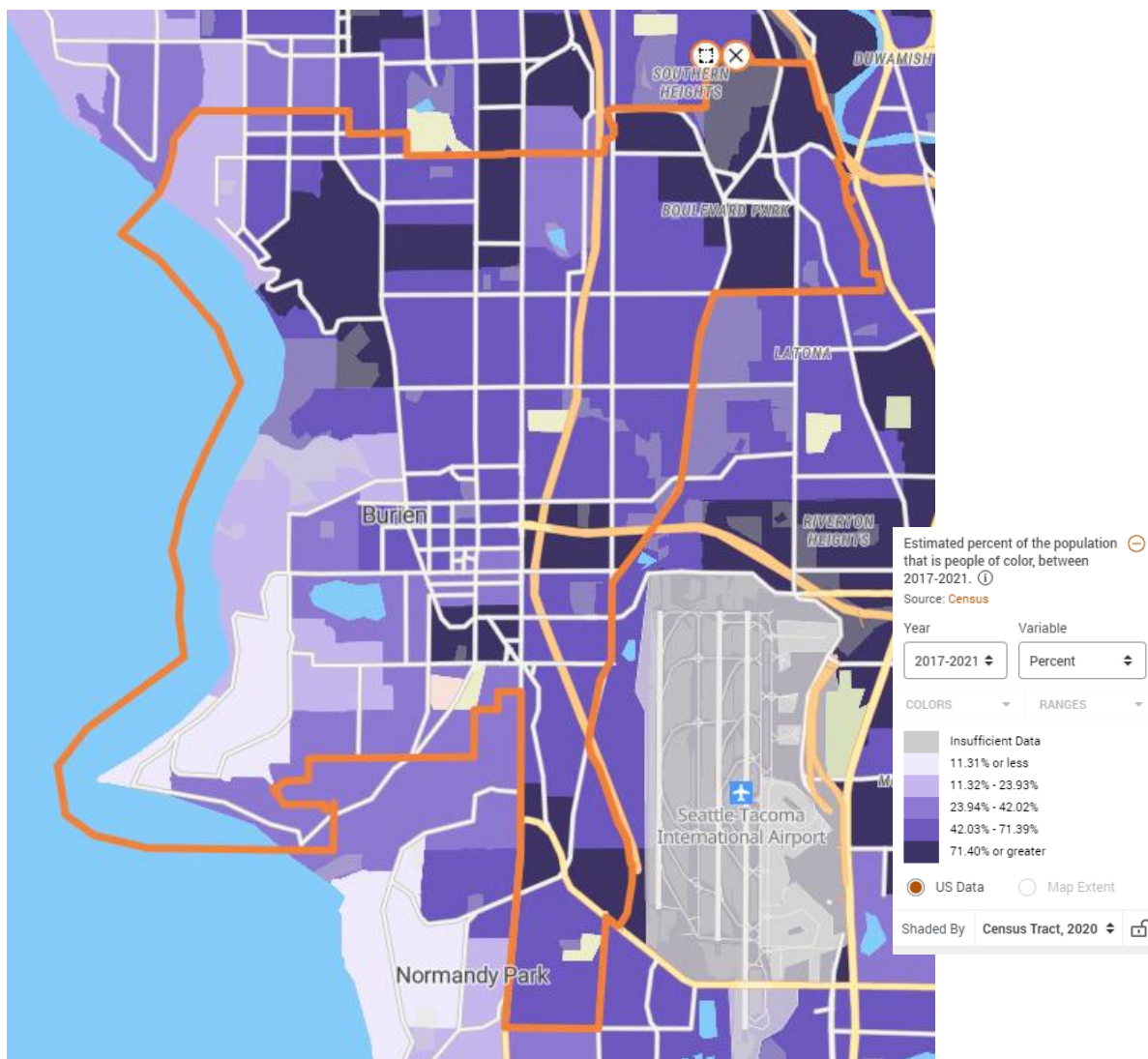


Sources: US Census, 2020; BERK, 2022

Exhibit 6 presents an alternative analysis generated from PolicyMap. [PolicyMap](#) provides a few data views to assess the geographic distribution of race and ethnicity. The example below is the estimated percent of the population that identify as a person of color based on American Community Survey five-year estimates (2017-2021). Map and report downloading is available only through a subscription.³⁴ The image below is a screen grab from the website (be sure to “grab” both the map and legend). The “citing” tab at the top of the webpage will generate a formatted citation for the data currently being viewed in the web view. PolicyMap is a convenient tool for rapid exploration of the geographic distribution of racial groups, ethnicity and measures of segregation and diversity.

³⁴ Commerce’s Growth Management Services unit currently has a PolicyMap subscription through 2023 and can work with jurisdictions to understand local data. Contact the Laura Hodgson at laura.hodgson@commerce.wa.gov for more details.

Exhibit 6. Example of assessment of exclusion, City of Burien, 2021



Sources: "Estimated percent of the population that is people of color, between 2017-2021." PolicyMap (based on data from Census: US Bureau of the Census, American Community Survey), 2023, www.policymap.com.

Assessing displacement

Displacement is when a household is forced or pressured to move from their community by factors outside of their control. Displacement can have a life-changing negative effect on households that are directly impacted. It can also disrupt the social fabric and networks of trust and support that exist within a community. Displacement can happen to households, businesses and community institutions. Knowing the type of displacement that has or is occurring is important for identifying policy or regulatory options to reduce the adverse impacts of displacement. While displacement due to rising costs is the most common form, there are many forms of displacement:

- **Economic displacement:** Displacement due to inability to afford rising rents or costs of homeownership like property taxes.
- **Physical displacement:** Displacement resulting from eviction, acquisition, rehabilitation or demolition of property, or the expiration of covenants on rent-or income-restricted housing. Climate-related displacement, such as increasing flood risk, dangerous heat or forest fire, falls into this category.

- **Cultural displacement:** Residents are compelled to move because the people and institutions that make up their cultural community have left the area.

Importantly, the scale of displacement analysis should be at the neighborhood level; that is, whether households or businesses are forced out of their neighborhood.

Reviewing where housing has been lost due to demolition or natural disasters can reveal evidence of physical displacement (displacement that has already occurred). Comparing the composition of the community today to the composition of the community ten years ago can reveal evidence of economic or cultural displacement. Gathering information from community members about who is leaving or who has left the area and why can help you identify measures of displacement most relevant to your community. Options for assessing displacement include:

- Number and location of foreclosures,
- Patterns of evictions,³⁵
- Tenant relocation assistance applications,
- Closure of manufactured home parks,³⁶
- Expiring affordable housing covenants,
- Housing units lost due to eminent domain or condemnations,
- Housing units lost to natural disaster,
- Condominium conversion applications,
- Loss of units affordable to low- and moderate-income households, and
- Reduction of the number of households of a specific community, such as households of specific races, income groups or age of householder.

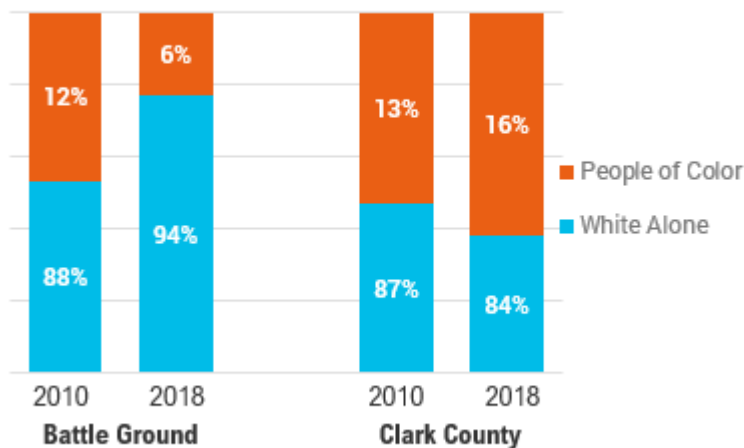
Exhibit 7 presents an example analysis of the racial composition of Battle Ground, Washington, including demographic change between 2010 and 2018 and comparing Battle Ground to Clark County. The analysis shows that white alone (not Hispanic) households comprised a greater share of the population in 2018 than in 2010. This pattern contrasts with the county pattern in which the portion of the population that is people of color grew over the same time.

³⁵ The [Evictions Study](#) is a useful resource for communities in King, Pierce, Snohomish and Whatcom counties. It provides data and maps about evictions by selected geography (down to census tract scale), risk factors that contribute to housing instability such as cost-burden, and relative eviction risk by race of tenant. See <https://tesseract.csde.washington.edu:8080/shiny/evictionmaps/>

³⁶ Manufactured home park (MHP) owners are required to provide twelve months' notice to the Department of Commerce prior to closing a manufactured home park (RCW [59.20.080](#)). Commerce maintains a list of all registered and all closed MHPs on their [Relocation Assistance Program](#) webpage. See <https://www.commerce.wa.gov/building-infrastructure/housing/mobile-home-relocation-assistance/>

Exhibit 7. Example analysis of displacement, City of Battle Ground, 2010 – 2018

Race and Ethnicity Composition, 2010 and 2018



Sources: American Community Survey (Table DP05) 5-Yr Estimates, 2010 & 2018; BERK 2022

This result begs the question, “Why did the demographic change in Battle Ground differ from the county wide change?” Further analysis ruled out annexation as a factor driving demographic change. More detailed analysis shows that whereas Clark County had an increase in the population of each racial group, Battle Ground saw a loss in the number of people that identify as Black or African American, Asian, Native Hawaiian and Other Pacific Islander, or some other race. However, the numbers are quite small, and some change could be due to people shifting the reporting of their own racial identity to “two or more races.”

Battle Ground’s largest minority group is Hispanic and Latino (roughly 9% of population for both Battle Ground and Clark County in 2018). Additional analysis shows that whereas 28% of new residents in Clark County are Hispanic, the rate for Battle Ground is only 9%. This suggests that development and in-migration to Battle Ground has benefitted white residents, potentially displacing non-Hispanic people of color and having an exclusionary or displacement effect on Hispanic residents.

Community input on a recent impediments to fair housing survey³⁷ reveals barriers related to language and bias, particularly for Hispanic households. The report concludes that bias may prevent Hispanic households from finding new housing in the community if needed. Further analysis and community engagement is needed to assess if land use changes or infrastructure investments are creating displacement pressure for people of color.

Identify areas at higher risk of displacement

Whereas analysis of displacement assesses where people have been displaced, displacement risk analysis looks at where future displacement is likely to occur given the current and expected market conditions and characteristics of households in the area. Local land use decisions impact displacement risk by creating incentives or disincentives for market actors (homebuyers, developers, investors and business owners). Local governments influence the market through planning land uses, approving development proposals, regulating land use and environmental controls, stimulating certain kinds of development with subsidies and incentives,

³⁷ <https://clark.wa.gov/sites/default/files/dept/files/community-services/CDBG/FullAIRreport.pdf>

and building capacity by developing public-private partnerships or creating networks among actors (Tiesdell and Allmendinger, 2005).

The GMA requires communities to identify areas that may be at higher risk of displacement from market forces that occur with changes to zoning development regulations and capital investments (RCW 36.70A.070(2)(g)). Identifying these areas allows a community to better plan for the needs of impacted households and implement protective measures. **Commerce is currently developing a statewide map of displacement risk at the census tract level to support jurisdictions in meeting the new requirements of the housing element.**³⁸

Displacement risk analysis typically includes a map showing areas of higher risk of displacement. Further analysis of the root causes of displacement can provide useful information for implementing protective measures targeted to the needs of households and businesses most at risk of displacement. BIPOC communities, and Black households in particular, are at higher risk of displacement due to past racial prejudice, persistent lower purchasing power and underrepresentation in the policy- and regulation-making system.³⁹

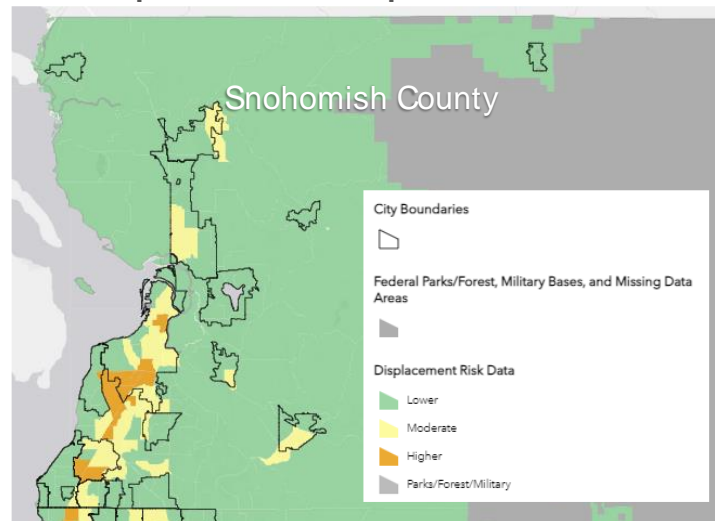
By considering who benefits and who is burdened by planning decisions and infrastructure investments, jurisdictions can adopt policies to prevent displacement, or at least reduce the hardships of displacement. For example, a new light rail transit station can lead to higher demand and rapid price increases, potentially displacing households who are unable to compete financially with new households. A policy to require some portion of new development to be affordable to the existing households in the community will provide options to those who may be displaced from their current units. By examining areas of the jurisdiction for signs of current and potential gentrification, jurisdictions can prioritize their mitigating measures for households most at risk.

In general, displacement risk analysis includes a combination of inputs:

- **Engagement** with residents, developers, community-based organizations, housing agencies and other parties that would have knowledge of displacement.
- **Data** that serves as indicators of neighborhood change and risk of displacement.
- **Staff knowledge** of areas that have experienced redevelopment/displacement or how a change in zoning or regulations could influence the development feasibility of the area.

There are a variety of displacement risk analyses that jurisdictions can use as models, notably the [Puget Sound Regional Council's \(PSRC\) Displacement Risk Map](#)⁴⁰ designed to identify communities with elevated risk

PSRC Displacement Risk Map



³⁸ A draft version of this statewide displacement risk map should be available by the summer of 2023.

³⁹ See [The Color of Law: A Forgotten History of How our Government Segregated America](#) by Richard Rothstein for more on racial discrimination in housing.

⁴⁰ <https://www.psrc.org/our-work/displacement-risk-mapping>

to displacement in the central Puget Sound region. The PSRC Displacement Risk Map uses a variety of indicators across the following five major categories: socio-demographics, transportation qualities, neighborhood characteristics, housing (including development capacity and price trends) and civic engagement. Jurisdictions in the central Puget Sound region can use this analysis, or choose to do their own analysis, using similar data to evaluate their own displacement risk. In addition to the PSRC displacement risk map, [displacement risk maps around 100 station areas](#)⁴¹ across Pierce, King and Snohomish counties are available through an online tool dashboard.

Data measures to identify higher risk of displacement typically fall into four types of factors:

- **Sociodemographic factors** that are associated with vulnerability to displacement.⁴² Examples include:
 - Percent of households that rent housing. Households that rent their housing are at a greater risk of displacement than households that own their homes, as rent may go up at any time. Households that rent their housing are also unlikely to benefit from the increased land values associated with gentrification.
 - The percent of people that identify as a race or ethnicity other than white, not Hispanic. Communities of color are particularly vulnerable because their housing options are more constrained due to generally lower incomes, less access to mortgage credit and discrimination (Bates, 2013).
 - Linguistic isolation, which can be measured as the percent of households in which members ages 14 or older do not speak English.
 - Educational attainment such as percent of the population older than 25 that has less education than a bachelor's degree.
 - Households experiencing housing cost burden, which are households paying more than 30% of their income on housing.
 - Presence of low-income households compared to the larger area.⁴³
- **Evidence of demographic change**, meaning that the presence of some populations is increasing while the presence of others is decreasing. For example, comparing the number or share of the population in 2010 to 2020 can identify if there has been a change in the racial composition of a neighborhood. A decrease in the number and share of the population that identifies as a person of color suggests a gentrification effect and potential displacement of people of color. Additionally, some methods test for change over time in the sociodemographic factors listed above.
- **Market factors** that indicate increased economic pressure on the use of land in the area. Examples include:
 - Percent increase in housing costs (housing cost velocity), particularly when housing costs were originally lower than citywide averages. This could be measured as a change in rents or a change in home sales prices, sometimes standardized on a square foot basis.

⁴¹ <https://soundcommunitiesps.org/new-tools/> - See Station Area Knowledge Base

⁴² The Center for Disease Control's (CDC/ATSDR) provides a [web-based mapping tool](#) with data on social vulnerability for every census tract in United States. The website provides detailed data on sixteen factors summarized into four themes. The factors include economic data as well as data regarding education, family characteristics, housing, language ability, ethnicity and vehicle access. Overall Social Vulnerability combines all the variables to provide a comprehensive assessment. See https://www.atsdr.cdc.gov/placeandhealth/svi/interactive_map.html

⁴³ Seattle uses 200% of poverty level data that is available through the American Community Survey (ACS).

- Parcels with underutilized development capacity based on a buildable lands analysis or low improvement to land value ratios based on assessor data. This indicates areas that are more feasible to redevelop, potentially displacing current residents.
- Changes in the number of units that are affordable to households at different income levels, through either demolition, redevelopment or expiring covenants.
- Homeowner tax arrears (unpaid taxes), which is an indicator of economic hardship for homeowners. The measures could be the amount in arrears or the length of time in arrears.
- Low quality housing or housing in poor condition compared to citywide average.
- New residential construction permits compared to the citywide average.
- Proximity to a gentrifying area. Some studies identify whether a census tract is touching a census tract that has high housing values or housing values that are accelerating faster than the citywide average. However, data on price estimates often include areas facing different market pressures, as housing prices are heavily influenced by lot factors such as view corridors, topography, pedestrian barriers, railroad tracks and other factors. Community input can help identify local factors and features that influence redevelopment pressure.
- Increases in the cost of living above the regional average.⁴⁴ Areas where the cost to meet one's basic needs is rising faster than other areas can lead to displacement.
- **Proximity to amenities** that could predict future market pressure (less commonly used than the other categories).
 - Access to employment centers.
 - Proximity to transit.
 - Proximity to civic infrastructure such as parks, natural amenities or other features.
 - Proximity to high-income neighborhoods, for example, census tracts with a median income of less than 80% of area median income (AMI) abutting tracts with a median income of greater than 120% AMI.

While a data-driven displacement risk analysis demonstrates where there is an increased risk of displacement, additional information is needed to help confirm that the data analysis adequately reflects local experience. Community engagement with neighborhood representatives, community-based organizations, developers, local businesses and others is essential to confirm the data analysis and identify the root causes of the displacement risk.

Alternatively, “pull factors” such as new job opportunities, the ability to move near a cultural resource, or changing neighborhood preferences may make residents choose to move to a different area. The local nuances to push and pull factors are important context for designing policies, programs and services that best meet the needs of community members at risk of displacement. Community input will help to identify the most effective policies to mitigate gentrification and displacement.

⁴⁴ The Center for Women's Welfare at the University of Washington publishes a self-sufficiency standard for counties and some sub-county areas in Washington state. This standard is a budget-based, living wage measure that defines the real cost of living for working families at a minimally adequate level. The Standard is an affordability measure and an alternative to the official poverty measure. See <https://selfsufficiencystandard.org/>

Information resulting from the displacement risk analysis will inform the development of anti-displacement policies, which is discussed more in Step 3 and Step 4.⁴⁵ The analysis can also provide a data baseline for monitoring displacement effects and the effectiveness of policy and strategy remedies.

As part of the [Walla Walla Regional Housing Action Plan](#) (2021),⁴⁶ FSC Group conducted a displacement risk analysis for the cities of College Place, Dayton, Waitsburg and Walla Walla. The analysis assesses vulnerability to displacement by census block groups across the region, adapted from the work of Dr. Lisa Bates of Portland State University (Bates, 2013) to address small sample sizes and ease of replicability. The analysis uses data from the American Community Survey (five-year estimates) on:

- Percent of households that are renters,
- Percent of households that are low-income,
- Percent of adults (25 or older) without a four-year college degree,
- Percent of population who identify with a community of color,
- Median home value, and
- Median gross rent.

Exhibit 8 presents the results of the risk of displacement analysis. Higher rates of these factors indicate an increased probability of redevelopment and an increased risk of displacement due to rising housing costs. The risk of displacement is rated high, moderate or low based on the number of factors for which the census tract scores higher than the regional pattern. Additional guidance on conducting a displacement risk assessment is included in [Appendix C: Technical Guidance on Data Analysis](#).

Exhibit 8. Example of assessing risk of displacement

Thresholds		Walla Walla County
% People of Color		>28%
% Without College Degree		>71%
% Rentals		>35%
Poverty Status: % Doing Ok		<66%
Median Home Value		<\$209,800
Median Gross Rent		<\$893

Thresholds		State
% People of Color		>31%
% Without College Degree		>65%
% Rentals		>37%
Poverty Status: % Doing Ok		<73%
Median Home Value		<\$311,700
Median Gross Rent		<\$1,194

Vulnerability Levels	
High	>5 indicators
Moderate	3-4 indicators
Low	<3 indicators

Census Tracts									
City	Census Tract	Poverty Status: % Doing OK	% Rentals	Median Home Value	Median Gross Rent	% Without Degree	% POC	Total Indicators	
Walla Walla	9204	100%	0%	NA	NA	97%	57%	2	
	9205	46%	54%	\$ 102,600	\$ 851	87%	66%	6	
	9206	54%	51%	\$ 134,200	\$ 891	84%	45%	6	
	9207.01	67%	53%	\$ 198,800	\$ 878	67%	20%	3	
	9207.02	68%	28%	\$ 224,100	\$ 1,023	56%	21%	0	
	9208.01	48%	42%	\$ 186,500	\$ 1,000	76%	20%	4	
	9208.02	49%	55%	\$ 208,500	\$ 831	65%	24%	4	
Waitsburg	9201	80%	17%	\$ 254,300	\$ 870	70%	12%	2	
College Place	9203	69%	41%	\$ 190,000	\$ 890	66%	25%	3	
Dayton	9602	68%	31%	\$ 170,800	\$ 740	75%	14%	3	

Source: [Walla Walla Regional Housing Action Plan](#), FSC Group, 2021

⁴⁵ The [Urban Displacement Project](#) provides research and technical resources on the nature of gentrification, displacement and exclusion for both residents and BIPOC-owned businesses. It provides research and tools to empower advocates and policymakers to create more equitable and inclusive futures for cities. See <https://www.urbandisplacement.org/about/>

⁴⁶ <https://www.wallawallapubliclibrary.org/home/showpublisheddocument/5631/637576228305162398>



Resources for Step 2: Gather and analyze data

- [U.S. Census Data](#)⁴⁷
- American Community Survey⁴⁸
- HUD Office of Policy Development and Research [Comprehensive Housing Affordability Strategy \(CHAS\)](#)⁴⁹
- [Policy Map](#)⁵⁰
- HUD Affirmatively Furthering Fair Housing Tool ([mapping tool](#))⁵¹ provides web-based tools for examining racial and ethnic segregation. The tool provides sixteen map themes related to segregation, exclusion, and social and economic vulnerability.
- The [Evictions Study](#)⁵²
- [PSRC's Household Travel Survey](#) gathers some community information on moving and reasons for moving⁵³
- Commerce's [Manufactured/Mobile Home Relocation Assistance Program](#) provides data on existing and closed mobile home parks⁵⁴

Community engagement

Community engagement activities in Step 2 should focus on identifying meaningful measures to understand the experience of communities of color, as well as their support interpreting the data, identifying root causes and identifying how the benefits and burdens of current policies are experienced in the community. Communicating and discussing your findings with community members and groups will ensure you have adequately understood your community and appropriately developed your framework for identifying impacts.

In advance of engaging the community, planners should develop and implement processes to identify potential remedies to disparate impacts, displacement and exclusion in housing with the community. Some community-generated solutions may be strategies related to the housing element, but may also include strategies related to economic development, education, transportation, parks and recreation, or other aspects of local government service.

⁴⁷ See more guidance on using U.S. Census Data in Appendix B and C. <http://www.census.gov>

⁴⁸ American Community Survey (ACS) data is available through the main U.S. Census Bureau website at <https://data.census.gov/>, but more specific information on ACS data can be found in Appendix B and on this website: <https://www.census.gov/programs-surveys/acs/data.html>.

⁴⁹ <https://www.huduser.gov/portal/datasets/cp.html>

⁵⁰ <http://www.policymap.com>

⁵¹ <https://egis.hud.gov/affht/>

⁵² <https://tesseract.csde.washington.edu:8080/shiny/evictionmaps/>

⁵³ <https://www.psrc.org/our-work/household-travel-survey-program>

⁵⁴ <https://www.commerce.wa.gov/building-infrastructure/housing/mobile-home-relocation-assistance/>



Checklist for Step 2: Gather and analyze data

- Did you look at **housing data broken down by race**? If your jurisdiction is too small to have reliable estimates broken down by race, did you **check with organizations** that serve the community about disparities in housing or potential patterns of displacement or exclusion?
- Did you determine whether there is **evidence of racially disparate impacts, displacement or exclusion in housing**?
- Did you conduct a **displacement risk assessment**?
- Did you **review the data evidence with impacted community members** to hear their perspectives on the policies, regulations, actions or root causes driving the disparities in outcomes?

Step 3: Evaluate policies

Once jurisdictions have identified if there is evidence of racially disparate impacts, displacement and exclusion in housing, they should review goals, policies and regulations to assess whether they contribute to those impacts. Before conducting your policy analysis, develop a framework that will be used to evaluate all housing goals and policies. While this guidance primarily uses the term “policies” in steps 3 and 4, goals should also be reviewed under this same evaluation framework.

We recommend assessing goals and policies according to two lenses that both contribute to the policy impacts. The first lens focuses on actions the policies support or prohibit. It should consider questions such as:

- 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?

The second lens focuses on the narrative effect of the policy and whether it furthers harmful biases about groups of people and communities. Racial bias is an inclination or predisposition for or against something based on unconscious associations about people based on race. Policies can encode the bias of the policymaker. Modern zoning, in that it seeks to separate people, reflects bias about people often coded in language that has historically been used to marginalize communities of color. Jurisdictions should review each goal and policy in the existing housing element for terminology that encodes bias, racially informed presumptions or phrases that promote exclusion. Some examples of policy language that encode bias, prejudice or exclusion could include:

- Policy language that relies on softer, less direct wording. For example, references to “appropriate areas for housing” instead of clear descriptions of geography or the criteria that are desired in residential areas.
- Language that conflates desired characteristics with a housing type. For example, terms such as “family housing” being used to describe desired housing or being used to exclude types of housing not associated with families, such as apartments. Since families live in all types of housing, in this case “family housing” is coded language with assumptions about income, race and living arrangements.

Update language should be updated to reflect what is meant such as single-unit housing, housing in larger configurations or housing that requires private yard space.

- Language that references code administration and enforcement without clear guidelines to avoid unintentional displacement, such as “maintain the appearance and safety of neighborhoods through frequent and effective code administration and enforcement.”
- Terms that do not say what the jurisdiction means, such as:
 - Using “citizen participation” instead of “public participation.” Avoid citizen participation because it excludes residents who may not be citizens but are members of the community.
 - Calling an area single-family when it includes housing for households with a variety of configurations and sizes. Instead of single-family, jurisdictions should use low-density housing, neighborhood residential or another descriptor of the housing that does not describe the occupants.

Carefully consider vague references to “protecting community character.” “Community character” is unspecific and can be misinterpreted as coded language that communicates exclusionary messages. While the character of a community may be important, it should be recognized that the GMA does not support the idea that neighborhoods should remain unchanged over time. Neighborhoods should evolve and change to adapt to the changing needs of residents. Policies that seek to preserve neighborhoods from any new forms of development can contribute to housing supply shortages, exclusion and the displacement of long-time residents when housing costs escalate.

The context in which the phrase is used is also important to consider. Some phrases are so often used to describe a specific idea or group of people that over time this context is embedded in the phrase’s meaning. Historical examples include “the projects” which carries stigma related to race, poverty and ineffectual government. In addition, the association with words and phrases change, so be careful that the policy communicates its intent with as much clarity as possible.

Exhibit 9 includes an example evaluative framework. As noted in the section on measures, the policy evaluation should be informed by consultation and conversation with community representatives, particularly representatives of communities experiencing disparate impacts, exclusion or displacement risk. Engaging impacted community members prior to evaluating policies will help reduce bias and lead to policy solutions that better address the experience of impacted communities.

Exhibit 9. Example policy evaluation framework

Criteria	Evaluation
The policy is valid and supports meeting the identified housing needs. The policy is needed and addresses identified racially disparate impacts, displacement and exclusion in housing.	S Supportive
The policy can support meeting the identified housing needs but may be insufficient or does not address racially disparate impacts, displacement and exclusion in housing.	A Approaching

Criteria	Evaluation
The policy may challenge the jurisdiction's ability to meet the identified housing needs. The policy's benefits and burdens should be reviewed to optimize the ability to meet the policy's objectives while improving the equitable distribution of benefits and burdens imposed by the policy.	C Challenging
The policy does not impact the jurisdiction's ability to meet the identified housing needs and has no influence or impact on racially disparate impacts, displacement or exclusion.	NA Not applicable

Exhibit 10 shows an example of findings from a policy evaluation using the example framework presented in Exhibit 9. The evaluation reflects the findings established in Step 1 and Step 2, including the identification of BIPOC communities, racially disparate impacts, displacement and exclusion in housing and the identification of areas that may be at higher risk of displacement.

Exhibit 10. Example policy evaluation

Policy	Evaluation	Why?
Promote private and public efforts to preserve the existing quality housing stock by maintaining sound units and rehabilitating substandard units.	S Supportive	Public and private efforts can help to preserve existing affordable housing inventory and allow residents to stay in housing they can afford. Renters, who are primarily BIPOC in the community based on the housing analysis, can benefit from this policy.
Allow more homes to be developed in areas that have existing infrastructure.	A Approaching	Using existing infrastructure supports the goals of GMA and results in lower building costs, which may result in lower rents and purchase prices. At the same time, adding more housing in areas served by existing infrastructure may still require infrastructure upgrades or improvements. Furthermore, new or upgraded infrastructure should be considered for areas that have been historically disinvested in, especially areas where communities of color live.
Maintain the character of established single-family neighborhoods, through adoption and enforcement of appropriate regulations.	C Challenge	Depending on how it is implemented, this policy has the potential to challenge the city's ability to meet the range of housing needs identified in the housing needs assessment. If implemented without regard to other housing needs, this policy may serve as a barrier to meeting these needs. Some types of zoning and regulations including minimum lot size requirements, prohibitions on multifamily homes, and limits on the height of buildings restrict the types of homes that can be built. Research has connected zoning to racial segregation, creating disparities in outcomes. Amending zoning standards to allow more types of housing and expanding housing choices that can be more affordable is an important way to undo past harm.

Policy	Evaluation	Why?
Adopt and apply code enforcement regulations and strategies that promote neighborhood protection, preservation, property maintenance, public safety and welfare.	C Challenge	Depending on how this is implemented, this policy has the potential to challenge the city's anti-displacement efforts. Code enforcement policies can often cause families with lower incomes to be disproportionately fined and possibly displaced from a neighborhood.

GMA's requirements related to racially disparate impacts, displacement and exclusion in housing do not require updates to other elements of the comprehensive plan. However, the GMA does require consideration of the effects of disinvestment and infrastructure availability for their contribution to racially disparate impacts (RCW 36.70A.070(2)(e)). Furthermore, the GMA's internal consistency requirement also requires amendments to the land use, utilities, capital facility and transportation elements so they are consistent with the housing element. Therefore, a review and subsequent update to related elements would ensure a comprehensive implementation of section (e) of the housing element requirements.



Checklist for Step 3: Evaluate policies

- Did you **identify housing needs** and/or **racially disparate impacts, displacement or exclusions in housing** to inform your policy evaluation?
- Did you evaluate if there are **goals** to address identified racially disparate impacts, displacement and exclusion in housing?
- Did you establish an **evaluation framework** tied to your identified housing needs and racially disparate impacts, displacement and exclusions in housing?
- Did you evaluate existing policies for the **distribution of benefits and burdens**?
- Did you systematically **evaluate all existing goals and policies** for how they may support or constrain meeting the identified housing needs and address and begin to undo racially disparate impacts, displacement and exclusion?

Step 4: Revise policies

Step 4 includes revising and updating housing goals and policies to address the identified racially disparate impacts, displacement and exclusion in housing from Step 2 and establishing anti-displacement policies. Revise existing policies and add missing policies to distribute the benefits and burdens of those policies more equitably. To meet the housing needs of all community members, jurisdictions will need to use a range of policies, incentives, strategies, actions and regulations, across multiple strategic categories such as:

- Increasing affordable housing production,
- Preserving existing affordable housing,
- Protecting existing communities, and
- Ensuring the benefits of investment and development are equitably distributed.

Community input can help ensure that revised and new policy solutions address the root causes of disparate impacts, displacement and exclusion and prevent new policies that impose a discriminatory effect. Community input can also help anticipate the impact of policies in different neighborhoods as well as identify positive and negative impacts on vulnerable and BIPOC community members specifically. This information is also helpful for establishing meaningful monitoring processes to track the impact of the revised and new policies. The policy development process should include input from both tenants and property owners. Furthermore, when adopting new policies, decision-makers should be informed about community input and how it is reflected in the proposed policy language.

Policy revisions should include:

- Retiring policies that have a discriminatory effect.
- Editing language to strengthen and clarify existing policies.
- Identifying new policies that are needed to begin to undo existing racially disparate impacts, displacement and exclusion in housing.
- Identifying new policies to prevent future displacement.
- Considering policies outside of the housing element to fully address the identified racially disparate impacts, displacement, displacement risk or exclusion in housing.

Exhibit 11 presents example policies that can begin to undo racially disparate impacts, displacement and exclusion in housing and prevent future displacement.⁵⁵

Exhibit 11. Example policies

Category	Policies
Increase affordable housing production	Use local and regional resources to generate revenue for housing, particularly for households with extremely low-, very low- and low-incomes.
	Adopt funding tools to support the development of affordable housing.
	Adopt incentives, strategies, actions and regulations that increase the supply of housing for households with extremely low-, very low- and low-incomes by private or public developers.
	Implement strategies that address cost barriers to housing affordability.
	Increase affordable housing options for all residents in areas that are within easy access to job centers or transit.
Preserve existing affordable housing	Dedicate resources to preserve existing housing for low-income households including addressing problems of substandard housing.

⁵⁵ A more complete list of policy options is presented in the discussion of Step 5: Review and update regulations .

Category	Policies
	Adopt incentives, strategies, actions and regulations that reduce barriers and promote access to affordable homeownership.
	Develop and promote community land trusts to allow permanently affordable ownership housing.
Protect existing communities	Adopt incentives, strategies, actions and regulations that encourage equitable development and mitigate displacement.
	Put in place strategies and regulations that protect housing stability for renter households.
	Adopt zoning that incentivizes new development more equitably across neighborhoods to prevent disproportionately burdening BIPOC households.
	Adopt and enforce ordinances directed at prohibiting housing discrimination.
Ensure the benefits of investment and development are equitably distributed	Allow a wider variety of housing types at all affordability levels in all residential areas.
	Adopt incentives, strategies, actions and regulations to create and sustain neighborhoods that provide equitable access to parks and open space, safe pedestrian and bicycle networks, clean air, soil and water, healthy foods, high-quality education, affordable and high-quality transit options and jobs.
	Adopt incentives, strategies, actions and regulations that increase the ability of all residents to live in the neighborhood of their choice and reduce disparities in access to areas with access to transit, open space, good schools, jobs and amenities.
	Protect the health of residents and mitigate any exposure to environmental hazards in neighborhoods.
	Use measures to track implementation and performance to ensure policies are working as intended to address racially disparate outcomes, exclusion, displacement and displacement risk.
Begin to undo racially disparate impacts, exclusion and displacement	Engage with communities disproportionately impacted by housing challenges in developing, implementing and monitoring policies that reduce and undo harm to these communities. Prioritize the needs and solutions expressed by these disproportionately impacted communities for implementation.

Category	Policies
	Engage and partner with communities most disproportionately impacted by housing challenges to inform strategies, actions, regulations and resource allocation decisions that reduce and undo harm to these communities.
	Adopt intentional, targeted strategies, incentives, actions and regulations that repair harm to households from past and current racially discriminatory land use and housing practices.
	Participate in relocation assistance to low- and moderate-income households whose housing may be displaced by condemnation or city-initiated code enforcement. (Redmond 2030: City of Redmond Comprehensive Plan , 2011 ⁵⁶)
	Strive to increase class, race and age integration by equitably dispersing affordable housing opportunities. Discourage neighborhood segregation and the isolation of special needs populations. (Planning to Blossom 2037: Wenatchee Urban Area Comprehensive Plan , 2022 ⁵⁷)
	When income-restricted housing becomes at risk of being converted to market-rate status, inform the tenants of any purchase and relocation options available. When possible, help the Housing Authority and non-profit organizations buy such housing.
	Work to decrease disparities in homeownership by race and ethnicity. (Seattle 2035: Comprehensive Plan , 2020 ⁵⁸)

Note: Additional policy examples are available in Appendix D of the [Guidance for Updating Your Housing Element](#) (2021). See sections titled preservation; variety of housing types; home ownership; affordable and subsidized housing; vulnerable populations and homelessness; equity, displacement and integration; and tracking and monitoring.

The effectiveness of anti-displacement policies is dependent on the timing of their implementation. For example, protective measures such as senior property tax relief will be less effective after older residents have been pushed out of the neighborhood. Additionally, in order for anti-displacement policies to be effective, policies should be implemented with or before moderate or significant zoning changes, especially in areas where there is shown to be high or even moderate risk of displacement.

Existing policies may provide a starting point for stronger policies. Exhibit 12 presents how a few example policies could become stronger and the rationale for changing the policies.

⁵⁶ <https://www.redmond.gov/DocumentCenter/View/258/Comprehensive-Plan-Housing-Element-PDF>

⁵⁷ <https://www.wenatcheewa.gov/home/showpublisheddocument/28248/638086086773200000>

⁵⁸ <https://www.seattle.gov/documents/Departments/OPCD/OngoingInitiatives/SeattlesComprehensivePlan/ComprehensivePlanCouncilAdopted2021.pdf>

Exhibit 12. Example policy revisions

Original policy	Revised policy	Rationale
Maintain the character of established single-family neighborhoods, through adoption and enforcement of appropriate regulations.	Maintain the scale and form of buildings in established residential neighborhoods through adoption of context-sensitive regulations.	<ul style="list-style-type: none"> Changed “character” to “scale and form” to make the policy clearer. Changed “single-family neighborhoods” to “residential neighborhoods” to describe the intent more accurately and to distribute the benefits of the policy more equitably. Removed “enforcement” due to implications of displacement risk. The policy now focuses on solutions tailored to the needs of the community and supports allowing residents to stay in their homes as much as possible.
Allow smaller single-family lot sizes in order to increase density but maintain single-family building scale and character in existing neighborhoods.	To meet different housing needs and promote efficient use of land, allow smaller single family lot sizes in existing neighborhoods subject to design standards.	<ul style="list-style-type: none"> Adjusted the reasoning for the policy and emphasized this by bringing the reasoning to the front of the policy. Removed the caveat (the “but” statement), because it promotes exclusion and conflicts with the intent of the policy.
Allow more homes to be developed in areas that have existing infrastructure.	Encourage the development of a wider variety of housing types in areas with existing infrastructure capacity, services and transit, while balancing the need to address disinvestment in historically disinvested neighborhoods.	<ul style="list-style-type: none"> Clarified what type of housing is appropriate in areas with existing infrastructure. Acknowledged that underinvestment in existing neighborhoods also needs to be addressed. This policy would require consistency with the capital facilities element policies.



Checklist for Step 4: Revise policies

- Did you **engage impacted community members** in identifying new goals and policies?
- Did you identify **policy and goal additions, alternatives or improvements** to address and begin to undo racially disparate impacts, displacement and exclusion?
- Did you include **anti-displacement policies** to support those who are most at risk of displacement?
- Did you review the policy updates for **consistency** with other parts of the comprehensive plan?
- Does the policy language **provide clear direction** for implementation including updates to development regulations, permitting process, fee structures and programming decisions?
- Are the policies **clear in their intent** and provide clarity for measurement and tracking success?

Step 5: Review and update regulations

To implement your goals and policies effectively, you must develop clear and achievable incentives, strategies, actions and regulations that help you move toward your goals. Strong policies will have clear intent, either in the policies themselves or as additional comments associated with the policies or implementation actions.

RCW 36.70A.070(2)(f) requires jurisdictions to implement regulations that address and begin to undo racially disparate impacts, displacement and exclusion in housing. To support jurisdictions in reviewing and updating regulations and programs, this section compiles a list of incentive, strategy, action and regulation options that can begin to undo racially disparate impacts, displacement and exclusion in housing at the local or regional level. Examples of implementation measures are presented in the same four broad categories as Step 4:

- Increase affordable housing production,
- Preserve existing affordable housing,
- Protect existing communities and households, and
- Ensure the benefits of investment and development are equitably distributed.

In addition to this section, there are various resources and policy guidance available to Washington jurisdictions to complete Step 5. Commerce's 2020 [Guidance for Developing a Housing Action Plan](https://deptofcommerce.box.com/shared/static/pophc16jetggscctctmnbjomm0qa7tpu8.pdf)⁵⁹ (referred to as "HAP Guidance" herein) provides detailed recommendations for identifying and selecting incentives, strategies, actions and regulations that have the greatest potential to address housing needs given your community's unique characteristics and market conditions. It also describes a wide range of possible incentives, strategies, actions and regulations that jurisdictions can use to achieve housing supply, diversity and affordability goals, including case studies and tips for the most effective implementation and additional information on policies to prevent or address displacement. Additional resources are listed in the box below.

⁵⁹ <https://deptofcommerce.box.com/shared/static/pophc16jetggscctctmnbjomm0qa7tpu8.pdf>



Resources for Step 5: Reviewing and updating regulations and programs

- The Washington State Department of Commerce provides numerous resources on [planning under the GMA](#) and [housing](#).⁶⁰
- [Municipal Research and Services Center \(MRSC\)](#)⁶¹ provides legal and policy guidance on many topics, including example programs and policies from across Washington state.
- [Housing Solutions Lab](#)⁶² provides data and policy guidance targeted to small and midsize cities.
- [Urban Displacement Project](#)⁶³ provides information on gentrification, displacement and effective policy solutions with examples from across the country.
- [Urban Institute](#)⁶⁴ provides research and evidence on policy solutions to address equity.
- [Sound Investments, Sound Communities: An Action Guide to Securing Land for Affordable Homes near Transit in the Puget Sound Region](#)⁶⁵ includes a section on preventing displacement, including elements of an anti-displacement plan for housing.

Exhibit 13 lists example policies and a summary of related implementation measures (incentives, strategies, actions and regulations). A detailed description of individual implementation measures and examples from Washington jurisdictions is available in [Appendix D: Policy Options](#).

⁶⁰ <http://www.commerce.wa.gov/serving-communities/growth-management/periodic-update/> and <http://www.commerce.wa.gov/building-infrastructure/housing/>

⁶¹ <https://mrsc.org/Home.aspx>

⁶² <https://localhousingsolutions.org/lab/>

⁶³ <https://www.urbandisplacement.org/about/what-we-do/>

⁶⁴ https://www.urban.org/about?gclid=Cj0KCQiAtICdBhCLARIsALUBFcFY3GjRorDapsCQMIORtESbLRxoaXv2FaPH1hhQAPJQrYsK2Jy2ANoaAr5FEALw_wcB

⁶⁵ https://soundcommunitiesps.org/wp-content/uploads/sites/6/2022/10/SISC_Manual_2022.pdf

Exhibit 13. Matrix of policies and implementation measures

Category	Policies	Incentives, strategies, actions and regulations
Increase affordable housing production	Use local and regional resources to generate revenue for housing, particularly for households with extremely low-, very low- and low-incomes.	Generate revenue for affordable housing <ul style="list-style-type: none"> • Affordable housing property tax levy • Housing and related services sales and use tax • Housing Trust Fund • First quarter percent real estate excise tax (REET 1) • Second quarter percent real estate excise tax (REET 2) • HB 1406 affordable housing sales tax credit • Lodging tax • Community Development Block Grants (CDBG) • HOME Investment Partnerships Program • Low-Income Housing Tax Credit (LIHTC) • Community Revitalization Financing (CRF) • Linkage fees for affordable housing
	Adopt funding tools to support the development of affordable housing. Adopt incentives, strategies, actions and regulations that increase the supply of housing for households with extremely low-, very low- and low-incomes. Increase affordable housing options for all residents in areas that are within easy access to job centers or transit.	Increase affordable housing production <ul style="list-style-type: none"> • Affordable housing incentive programs • Density bonuses • Rezoning • Affordable housing overlay (AHO) zones • Zoning reforms • Inclusionary zoning (IZ) • Strategic infrastructure investments • Local programs to help build missing middle housing • Transfer vacant/underutilized land and buildings • Multi-Family Tax Exemption (MFTE) • Impact fee waivers • Accessory dwelling units (ADUs)/Detached ADUs (DADUs) • Zoning supporting smaller housing typologies such as micro-apartments and tiny homes • Waive, reduce or defer fees and charges for low-income housing projects to incentivize affordable housing
Preserve existing affordable housing	Prioritize the use of local and regional resources to preserve existing housing that serves the needs of BIPOC communities.	<ul style="list-style-type: none"> • Mobile home park preservation • Mobile home park conversion to cooperative • Support third-party purchases of existing affordable housing • Support Community Land Trusts (CLTs) • Retain affordability over time • Notice of intent to sell ordinance • Regulating short-term rentals
	Adopt incentives, strategies, actions and regulations that reduce barriers to and promote access to affordable homeownership.	

Category	Policies	Incentives, strategies, actions and regulations
Protect existing communities and households	<p>Adopt incentives, strategies, actions and regulations that encourage equitable development and mitigate displacement.</p> <p>Put in place strategies and regulations that protect housing stability for renter households.</p>	<p>Homeownership programs</p> <ul style="list-style-type: none"> • Support programs that provide financial assistance to low-income homeowners through down payment assistance • Support homeownership and foreclosure education and counseling programs • Support programs that offer home repair and rehabilitation assistance • Support home mortgage loan programs • Fee waivers for water or sewer connection <p>Rental assistance</p> <p>Tenant protections</p> <ul style="list-style-type: none"> • Rental assistance • Programs that protect tenants • Right to return policy • Rental inspection and registry program • Support for tenant education and property owner incentive programs • Deferral of property tax • Tax deferral for retired persons • Tax deferral for specific individuals • Tenant right to counsel • Sewage and solid waste fee assistance programs • Relocation assistance • Tenant Opportunity to Purchase • Regulate short-term rentals
Ensure the benefits of investment and development are equitably distributed	<p>Adopt incentives, strategies, actions and regulations that increase the ability of all residents to live in the neighborhood of their choice and reduce disparities in access to areas with access to transit, open space, good schools, jobs and amenities.</p> <p>Use measures to track implementation and performance to ensure policies are working as intended to address racially disparate outcomes, exclusion, displacement and displacement risk.</p>	<ul style="list-style-type: none"> • Community benefits agreements • Support community-led investments • Monitor for equitable outcomes

Exhibit 14 illustrates the menu of options available to cities as they look to put in place anti-displacement policies. Research from California, drawing on a review of more than 150 articles, as well as interviews with 14 practitioners and academics, has laid out which policies may be more effective at preventing displacement and the timelines in which they work. This research is summarized in the exhibit below.

Exhibit 14. Summary matrix of anti-displacement policies

Category	Incentives, strategies, actions and regulations	Potential to prevent displacement	Implementation scale	Timeframe to prevent displacement
Production	Increase housing production	High	Local, State	Long-term
Production	Inclusionary zoning and developer incentives	Medium	Local, State	Long-term
Production	Accessory dwelling units	Medium	Local, State	Long-term
Production	Affordable housing linkage fees ⁶⁶	Low	Local	Long-term
Production	Housing overlay zones	Medium	Neighborhood, Local	Long-term
Preservation	Unsubsidized affordable housing	High	Local, State	Long-term
Preservation	Housing rehabilitation	Low	Local, State, Federal	Short-term
Preservation	Condominium conversion restrictions and tenant opportunity to purchase	Medium	Local	Short-term
Preservation	Community control of land (e.g., community land trusts)	High	Neighborhood, Local	Short-term
Equitable Distribution	Community benefits agreements	Low	Neighborhood, Local, State	Long-term
Protect Existing Communities	Rental assistance programs	High	Local	Short-term
Protect Existing Communities	Foreclosure assistance	High	Local, State, Federal	Short-term

⁶⁶ Affordable housing linkage fees are programs where market rate development pays fees to help fund affordable housing.

Category	Incentives, strategies, actions and regulations	Potential to prevent displacement	Implementation scale	Timeframe to prevent displacement
Protect Existing Communities	Tenant right to counsel	High	Local	Short-term
Protect Existing Communities	Just cause evictions	High	Local, State	Short-term

Source: Chapple, K and Loukaitou-Sideris, A, 2021. Retrieved from <https://www.urbandisplacement.org/wp-content/uploads/2021/08/19RD018-Anti-Displacement-Strategy-Effectiveness.pdf>

The evaluation approach described in Step 3 is a useful model for updating your development regulations to align with your goals and policies and to ensure that they equitably serve all community members. As you update your regulations, consider the regulations intended and unintended impacts and the distribution of the benefits and burdens. Establishing guiding questions at the outset to direct your analysis will ensure your evaluation is thorough and transparent, which is helpful to the legislative process necessary for regulatory changes. In addition, it can provide a framework to balance multiple GMA or comprehensive plan goals.⁶⁷

Guiding questions **may** include:

- What does the regulation protect or prevent?
- Who benefits from this regulation and how?
- Who is burdened by this regulation and how?
- Does the regulation perpetuate or worsen identified racially disparate impacts, displacement or exclusion in housing?
- Can the regulations benefits be more widely distributed?
- Can the regulations burdens be minimized or more widely shared?
- Does the regulation support the goals, objectives and policies in our comprehensive plan?
- Does the regulation offer alignment with the goals of GMA, countywide planning policies and other parts of the comprehensive plan?

The guiding questions related to the GMA goals, countywide planning policies, and the comprehensive plan goals and policies are intentionally considered at the end. This allows evaluation of these guiding questions to take into consideration who benefits from and who is burdened by the regulation.

Exhibit 15 provides an example of how these guiding questions can be used to evaluate development regulations for accessory dwelling units. A jurisdiction may find that it need not review each regulation at the following level of detail if it is readily apparent that the regulation does or does not require updating. However, the following evaluation process can be useful when uncertainty exists over how well a regulation aligns with your stated goals and policies, or if there is a need to more closely evaluate a regulations distribution of benefits and burdens.

⁶⁷ Jefferson County and the Jefferson County Board of Health provide a good example of a regulatory reform program designed to balance and further many competing objectives such as removing barriers to housing while conserving the environment. See [Jefferson County and Jefferson County Board of Health Resolution 17-19](https://test.co.jefferson.wa.us/weblinkexternal/0/edoc/2407958/Res%20No.%20017%2019.pdf?AspxAutoDetectCookieSupport=1) available at <https://test.co.jefferson.wa.us/weblinkexternal/0/edoc/2407958/Res%20No.%20017%2019.pdf?AspxAutoDetectCookieSupport=1>

Exhibit 15. Example regulation review

Comprehensive Plan Goals	<p>Goal H 1: To maintain and strengthen existing residential neighborhoods.</p> <p>Goal H 2: To provide opportunities to develop a mix of housing types throughout the city to meet the needs of all economic segments of the community.</p>
Regulation	<p>Accessory dwelling units require one (1) parking space in a minimum 10-ft.-by-20-ft. garage in addition to the required parking for the primary residence.</p> <p>Single-family dwellings, manufactured homes and mobile homes shall require two (2) parking spaces in a minimum 20-ft.-by-20-ft. garage.</p>

Question	Evaluation
What does the regulation intend to protect or prevent?	<p>The regulation is meant to assure that on-site parking is provided for residential use. The regulation reduces the need for parking on public streets, thereby enhancing safety for pedestrians and drivers.</p> <p>The requirement for parking within a garage is to create an aesthetically pleasing environment. However, there is no requirement for users to park in the garages.</p>
Who benefits from this regulation and how?	<p>The regulation for providing parking spaces on site benefits vehicle traffic through residential areas.</p> <p>The regulation for providing parking spaces on site benefits neighbors who currently park on street in the public right of way.</p> <p>The regulation for providing covered parking benefits the neighbors who may not like looking at vehicles.</p>
Who is burdened by this regulation and how?	<p>The regulation significantly increases the cost associated with adding an accessory dwelling unit and prevents many existing homeowners from doing so due to the current configuration of their site and the inability to erect a garage to provide an additional parking space.</p> <p>People who could be housed by accessory dwelling units currently face a housing shortage. In that this regulation prevents the addition of new housing, it burdens households who are currently underserved by the housing available in the community, primarily households with low to moderate incomes.</p>
Does the regulation contribute to identified racially disparate impacts, displacement, or exclusion in housing?	<p>The city has identified potential exclusions of people of color in its older (pre-1980) neighborhoods as well as disproportionate housing cost burden on behalf of Hispanic and Latino households.</p> <p>The regulation contributes to racially disparate impacts and exclusion by limiting the production of housing in a greater variety of housing forms that is affordable to low and moderate-income households that are disproportionately comprised of households of color.</p>

Question	Evaluation
Can the benefits be more widely distributed?	The neighbors and vehicle traffic benefits cannot be more widely distributed given that the regulation applies to accessory dwelling units in all zones.
Can the burdens be minimized or more widely shared?	<p>Removing the requirement for parking within a garage can reduce the burden on homeowners who wish to add a housing unit on their lot and those who could be housed in the new housing.</p> <p>Removing the requirement for adding a parking space for an accessory dwelling unit within a garage can benefit homeowners who wish to add a housing unit on their lot and can benefit those seeking this type of housing.</p>
Does the regulation support the goals, objectives, and policies in our comprehensive plan?	<p>The regulation maintains existing neighborhoods (Goal H-1) but does not strengthen existing neighborhoods (Goal H-1) because it discourages investment and incremental change of existing housing in neighborhoods.</p> <p>The regulation does not support developing a mix of housing types throughout the city to meet the needs of all economic segments of the community (Goal H-2). The regulation is counter to this goal in that it prevents the development of new housing more affordable to economic segments currently underserved in the jurisdiction.</p>
Does the regulation offer alignment with the goals of GMA, countywide planning policies, and other parts of the comprehensive plan?	The city does not have frequent transit and is not subject to standards imposed by RCW 36.70A.620 and RCW 36.70A.698 . ⁶⁸



Checklist for Step 5: Review and update regulations

- Did you **establish guiding questions** for your review of regulations?
- Did you **review your regulations and programs** for how well they do or do not implement the policies developed in Step 4?
- Did you **review your regulations for their alignment with the goals of GMA**, countywide planning policies and other comprehensive plan goals?
- Did you **update your regulations to align with your comprehensive plan goals and policies** to address and begin to undo racially disparate impacts, displacement and exclusion?

⁶⁸ See GMA guidance on parking standards for market rate, senior, and affordable housing and ADUs within one-quarter mile at [RCW 36.70A.620](#) and [RCW 36.70A.698](#).

Definitions

Community planning requirements: Requirements set forth in the Growth Management Act, which requires jurisdictions to plan for population and job growth and develop comprehensive plans for their jurisdictions, which are aligned with countywide planning policies and projections of population from the Office of Financial Management.

Discriminatory effect: The effect, regardless of intent, of differentiated outcomes for a group based on a protected classification. May be an action or failure to act. Protected classifications include race/color, national origin, religion/creed, sex/gender/domestic violence status, familial status, disability, marital status, sexual orientation and military/veteran status.

Disinvestment: A process by which a community is not prioritized for investment, or by which a system, policy or action disincentivizes investment in a specific area. Disinvestment processes occur over time, often in the long term.

Displacement: The process by which a household is forced to move from its community because of conditions beyond their control.

- Physical displacement: Households are directly forced to move for reasons such as eviction, foreclosure, natural disaster or deterioration in housing quality.
- Economic displacement: Households are compelled to move by rising rents or costs of home ownership like property taxes.
- Cultural displacement: Residents are compelled to move because the people and institutions that make up their cultural community have left the area.

Displacement risk: The likelihood that a household, business or organization will be displaced from its community.

Equitable development initiatives: Public and private investment, programs, and policies designed to meet the needs of marginalized populations and to reduce disparities so that quality of life outcomes such as access to quality education, living wage employment, healthy environments, affordable housing and transportation are equitably distributed.⁶⁹

Exclusion in housing: The act or effect of shutting or keeping certain populations out of housing within a specified area, in a manner that may be intentional or unintentional, but which leads to non-inclusive impacts.

Gentrification: The process of neighborhood change resulting in households being unable to remain in their neighborhood or move into a neighborhood that would have been previously accessible to them. The neighborhood change includes economic change in a historically disinvested neighborhood, such as rising land values and rising housing costs, as well as demographic change representing a shift in the income, racial composition, or educational level of residents. This is also referred to as “neighborhood exclusionary change”

⁶⁹ This definition is based on the City of Seattle’s definition for equitable development. See [Equitable Development Initiative](https://www.seattle.gov/opcd/ongoing-initiatives/equitable-development-initiative#background), available at <https://www.seattle.gov/opcd/ongoing-initiatives/equitable-development-initiative#background>

or “exclusionary displacement.” Gentrification creates discriminatory effects when it forces the displacement of long-time residents and businesses.⁷⁰

Inclusionary zoning: A regulatory tool that requires permanent affordable units to be included within new residential development projects, or requires payment for construction of such units elsewhere (fee-in-lieu). “Permanent” refers to affordable unit availability in the long term, specifically, for 50 years as defined by Washington code.

Infrastructure: The facilities and systems that serve a country, city, or area, such as transportation, parks, communication systems, energy and utility systems, and schools.

Land disposition policies: Conversion of underutilized and surplus public land for other uses, guided by state law. State law has identified affordable housing as a public benefit and allows cities to sell or lease land at a reduced cost, or donate it altogether, for development of affordable housing.

Market forces: Economic factors that impact the provision, price and/or demand for housing.

Preservation of historical and cultural communities: Efforts by the Washington State Department of Archaeology and Historic Preservation (DAHP) or another organization to identify, document, protect or commemorate specific places associated with historical or cultural significance. Historical communities in Washington state are considered to be 30 years or older. Significance is defined by local communities, but often can be limited in its recognition when communities do not have the resources to make the necessary nominations.

Racially disparate impacts: When policies, practices, rules or other systems result in a disproportionate impact on one or more racial groups.

Tenant protections: Includes legal protections for people who pay rent for the place where they live. In Washington state, legal protections are established under the Residential Landlord-Tenant Act (RCW 59.18). Local governments can establish additional protections for people who rent the place they live.

⁷⁰ Definition adapted from the [Urban Displacement Project](https://www.urbandisplacement.org/about/what-are-gentrification-and-displacement/). See <https://www.urbandisplacement.org/about/what-are-gentrification-and-displacement/>

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Appendix A. Zoning and Race

Zoning and race

A goal of the Growth Management Act is to “plan for and accommodate housing affordable to all economic segments of the population of the state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock” (RCW 36.70A.020(4)). Local governments are required to plan for housing that meets the needs of all residents by ensuring sufficient residential land capacity for housing (RCW 36.70A.070(2)(c) and RCW 36.70A.115).

Racism has shaped American history from the beginning, including the form and shape of our communities. European American settlement on Native American land, the Indian Removal Act (1830), slavery, post- Civil War Jim Crow laws, the Chinese Exclusion Act (1882), and Japanese internment during World War II are among the many notable events that have shaped how we live today. These and other events deprived groups of people from access and opportunity, leading to negative outcomes that were later used to justify further discriminatory policies and practices. Zoning and other land use practices that emerged in the 20th century furthered this pattern of discrimination and shape racially disparate impacts that are perpetuated today.

Local zoning originated in the early 1900s as a tool to address growth and industrialization (see the high-level [Chronology of race in land use](#) below). From its beginning, zoning laws have been used to segregate households by race and ethnicity. The American Planning Association explains that “zoning, which is intended to separate incompatible land uses, has also been used to exclude certain population groups from single-family neighborhoods and to exclude multifamily rental housing from neighborhoods with better access to jobs, transit, and amenities” (American Planning Association, 2019).

Zoning is not the only governmental program that has led to racially disparate impacts, displacement and exclusion in housing. Public policies forced the displacement of Black, Indigenous and people of color (BIPOC) households through urban renewal and midcentury interstate highway construction. Private practices such as racially restrictive covenants and steering have prevented BIPOC households from accessing housing in certain neighborhoods. Government-sanctioned financial practices such as redliningRedlining, the home mortgage interest tax deduction, predatory lending and the systemic undervaluing of real estate in BIPOC neighborhoods have contributed to the devaluation of BIPOC household property and wealth.⁷¹

Today, zoning laws—such as exclusively single-family zones, minimum lot sizes and separating multi-family development from single-family development—serve to exclude minorities and lower-income households from accessing large parts of our cities and protect and enhance the land value of white neighborhoods while undermining the value of land owned by people of color. Regardless of the intent of current land use policies, past and present land use regulations create the effect of racially disparate impacts. For example, the 2019 Washington state homeownership rate for BIPOC households is 49%, compared to 68% for non-Hispanic white households (Homeownership Disparities Work Group, 2022). Since a greater proportion of BIPOC households rent their housing, BIPOC households face greater housing insecurity and displacement risk.

⁷¹ Many of the practices noted in this paragraph are further described in the below section titled “[Key terms](#).”

Existing zoning regulations, regardless of intent, can perpetuate the racially disparate impacts of past practices. To meet the GMA's goal of accommodating housing affordable to all economic segments of the population, jurisdictions are required to have sufficient development capacity to accommodate a variety of housing types that offer housing at a variety of price points (RCW 36.70A.070(2)(c)). To ensure the benefits of housing policy extends to all Washingtonians in a fair and transparent manner, the GMA requires jurisdictions to thoroughly review and improve housing policies to address and begin to undue racially disparate impacts.

Chronology of race in land use

1910

Baltimore, Maryland adopts racial zoning code promoted as a measure to maintain racial peace.

Blacks could not "move into, or attempt to occupy, a house in a block where 51 percent or more of the houses therein were occupied by whites, or vice versa," with an exception provided for live-in servants. The code makes explicit use of racial categories for establishing where one could live. Other cities adopt similar codes (National Park Service, March 2021).

1913

New federal income tax is enacted that includes a deduction on interest paid on loans.

Mortgage interest deduction (MID) eligibility has since been selective and exclusionary. An owner household needs a documented mortgage with a lender, excluding renters and homeowners without mortgages. The MID advantages white households who have consistently higher rates of homeownership than households of color (Coalition, Meshede, Morgan, Aurand, & Threet, 2021).

1917

In *Buchanan v. Warley*, (245 U.S. 60), the U.S. Supreme Court rules a Louisville, Kentucky municipal racial zoning ordinance unconstitutional.

This type of racial zoning ordinance, which sought to prohibit black households from purchasing property in neighborhoods with white majorities, was ruled in violation of the 14th amendment (Rait, 2022).

1920s

Racially restrictive covenants⁷² became a widespread tool of discrimination during the first half of the 20th century. Restrictive covenants were used by developers to increase the desirability of new neighborhoods for white homeowners and to prevent the migration of people of color into their neighborhoods. This resulted in segregated residential neighborhoods and restricted people of color from homeownership. It was not until 1948 that the U.S. Supreme Court ruled racially restrictive covenants to be unenforceable (Welsh, 2018).

1926

The Supreme Court finds that zoning was a valid exercise of the police power (*Village of Euclid v. Ambler Realty Co.*, 272 U.S. 365).

⁷² In 2022, Washington State passed SHB 1335, concerning review and property owner notification of recorded documents with unlawful racial restrictions, which assigned Eastern Washington University and the University of Washington with the task of finding all of the racially restrictive property covenants in the state and informing owners about how to remove them. See <https://inside.ewu.edu/racial-covenants-project/> and <https://depts.washington.edu/covenants/>.

This decision allowed for the subsequent growth of zoning ordinances across the country. The Supreme Court “Euclid” case allowed communities to adopt zoning to “see that the right sort of buildings are put in appropriate places and the wrong sort excluded from inappropriate places,” thereby legally allowing the segregation of land uses, and by extension people, in neighborhoods and cities (Rait, 2022).

Euclid v. Ambler enabled jurisdictions to adopt zoning ordinances that were economically exclusive, in part to exclude Black people from certain areas. Ordinances prohibited apartment buildings from being built in suburbs that had single-family homes while others required single-family homes to have large setbacks and be set on multiple acres, all as an attempt to make the suburbs racially exclusive (Rait, 2022) (Rothstein, 2017).

1933

The Homeowners Refinancing Act (also known as the Home Owners' Loan Act of 1933) was passed, as well as the National Housing Act of 1934.

The Home Owners Loan Corporation (HOLC) was established and eventually generated residential security maps that drew lines around and rated neighborhoods in larger metropolitan areas across the U.S. The rating scale was from A to D, with A being an area of preferred investment and D being the riskiest. The HOLC maps led to the term “redlining” since a neighborhood that netted a D grade was outlined in red. Areas with deed and zoning restrictions in place to sufficiently protect a neighborhood from select social groups and incompatible land uses were rated higher. The Veterans Administration and the Federal Housing Administration (FHA) utilized the HOLC map classifications to determine credit worthiness (Rait, 2022).

1944

The Servicemen’s Readjustment Act (GI Bill) provided additional resources to returning World War II veterans. The GI Bill offered low-interest home loans, leading to a post-war boom in the nation’s housing stock, primarily in the suburbs. In the years immediately following World War II, veterans’ mortgages accounted for over 40 percent of all home loans.

While the GI Bill’s language did not specifically exclude Black veterans from its benefits, it was structured in a way that prevented 1.2 million Black veterans from fully accessing the benefits (Baker, 2016). Nonwhite veterans still had to contend with the banks, which denied loan applications in nonwhite neighborhoods because the FHA utilized the HOLC map classifications to determine credit worthiness thereby limiting housing access. Restrictive covenants also contributed to making it difficult for minorities to obtain an affordable home mortgage through this program.

The disparity in the GI Bill’s implementation contributed to growing gaps in wealth, education and civil rights between white and Black Americans (National Park Service, March 2021) (Blakemore, 2019).

1948

The U.S. Supreme Court ruled that the use of racial deed restrictions and restrictive covenants were unenforceable (*Shelley v. Kraemer*, 334 U.S. 1 (1948)) (Welsh, 2018).

1949

The Housing Act of 1949 provided significant funding for urban renewal projects. From the 1950s through the 1970s, “urban renewal” was a common practice in the U.S. that allowed local jurisdictions to use federal dollars to improve neighborhoods deemed to be “blighted” or “slums,” displacing many households.

Due to redlining and other policies, there had been a lack of investment in neighborhoods of color, which meant that redlined areas were more likely to be marked as blighted and slated for urban renewal projects. In the process, between 1955 and 1966, 300,000 families were forced to move, with the burden falling disproportionately on people of color (Miller, 2017).

1956

The National Interstate and Defense Highways Act funded the construction of the Interstate Highway System. By accelerating suburbanization, the National Interstate and Defense Highways Act benefitted white middle-class families because the benefits of homeownership accrued to primarily white populations in the suburbs.

In urban areas, the National Interstate and Defense Highways Act led to the demolition of what were deemed “blighted” urban areas, displacing and further impoverishing communities of color. In many cases, interstate routes were chosen based on areas where land costs were the lowest or where political resistance was weakest. In practice, this meant that low-income and BIPOC communities bore the burden and displacement caused by the development of urban interstates. According to estimates from the U.S. Department of Transportation, more than 475,000 households were displaced to make way for federally aided highways (Office of the Secretary of Transportation, 2017).

1968

The Civil Rights Act of 1968 prohibited housing discrimination based on race, color, religion or national origin. The act put into place federal policies for enforcing the Fair Housing Act and gave victims of discrimination the ability to seek redress.

1975

The U.S. Commission on Civil Rights announced that the “struggle to achieve equal opportunity in housing is far from over.” While “blacks today can purchase or rent property outside of ghetto neighborhoods,” the commission observed, “few can do so without great difficulty, inconvenience, and costs of an economic, social, and psychic nature.” Furthermore, the benefits of fair-housing policies “have been confined largely to middle- and upper-income minorities,” while few low-income families had been able to move into more desirable neighborhoods (National Park Service, March 2021).

2022

The 2019 BIPOC homeownership rate in Washington State is 49%, slightly higher than the national BIPOC homeownership rate, but 19 percentage points below that of non-Hispanic white households in Washington (with a homeownership rate of 68%, as of 2019) (Homeownership Disparities Work Group, 2022).

Key terms

Home mortgage interest tax deduction

Home mortgage interest tax deductions (MID) allow homeowners to reduce their taxable income by deducting mortgage interest on a primary residence or second home from their taxable income. To claim this tax deduction the total itemized deductions must be greater than the standard deduction.

Rather than incentivizing homeownership, research conducted by the Federal Reserve and American University suggests that the MID reduces the homeownership rate by raising the cost of purchasing a home (Drew, 2021). This disproportionately impacts BIPOC homebuyers because they are less likely to have the access to credit and resources needed to purchase higher-priced housing.

As home values and incomes rise, the value of the MID (the cost to taxpayers) also grows, and disproportionately benefits white households. While 67.5% of American households identify as white, 77.9% of the benefits of the MID go to white households, due to their higher homeownership rates (Haugen, 2020). Conversely, 8.5% of American homeowners identify as Black and receive only 6.2% of the total benefits from the MID (Haugen, 2020). If the total tax savings from the MID were distributed proportionately to all households by race/ethnicity, BIPOC households would receive an estimated \$1.1 billion more in savings (Drew, 2021).

Midcentury interstate highway construction

Following the National Interstate and Defense Highways Act of 1956, many interstate highway systems were routed directly through Black and Latino communities to foster prosperity, shorten commute times and create jobs for suburban residents. By doing so, however, this highway program demolished BIPOC homes and bisected BIPOC communities (Gamboa, McCausland, Lederman, & Popken, 2021). Moreover, the noise and pollution produced by new highways decreased the value of properties on adjacent streets.

Because this period of highway construction occurred when courts around the country were beginning to strike down traditional tools of segregation, highways became a new tool of segregation. At times, highways were intentionally built on formal boundary lines that were previously used for racially restrictive zoning, sometimes even at the request of people who wanted to create a barrier between their community and encroaching Black and Latino communities (King, 2021).

Between 1957 and 1977, the highway program displaced over 475,000 households and one million people (Gamboa, McCausland, Lederman, & Popken, 2021). Once displaced from their historical neighborhoods, racially restrictive covenants prohibited BIPOC households from moving to or buying homes in suburban communities. Instead, displaced BIPOC households were offered tenancy in large-scale public housing projects (Zonta, 2019).

Predatory lending

Predatory lending occurs when unfair and deceptive loan terms are imposed on borrowers. These loans often work in the lender's benefit by carrying high fees and interest rates, stripping the borrower of equity, or placing a borrower in a loan with a lower credit rating, making it more expensive (Communities United, 2023).

Predatory lending has negatively impacted communities across the country, but it has been especially detrimental to BIPOC communities because financial institutions can exploit vulnerabilities related to housing segregation and discrimination (ACLU, n.d.). Consequences to BIPOC communities can be seen in continued foreclosures in communities of color, as well as in the increasing racial wealth gap.

Black households have been disproportionately affected by predatory lending, and in recent years, high-income Black households have become the target for predatory loans (Badger, *The Dramatic Racial Bias of Subprime Lending During the Housing Boom*, 2013). Historically, practices like redlining prohibited people of color from accessing traditional forms of credit. BIPOC applicants were either precluded from buying property or forced to seek out nontraditional forms of credit, thereby facilitating the prevalence of predatory lending practices. Although these nontraditional sources of credit—such as installment land contracts—provided credit to BIPOC applicants, they generally did so with significantly higher costs and increased risks for the borrower (Badger, *Chicago Tribune*, 2016).

Compared to white applicants and controlling for geographic factors, Black applicants are 2.8 times more likely to be denied for a loan, and Latino applicants are two times more likely to be denied for a loan (Badger, *The Dramatic Racial Bias of Subprime Lending During the Housing Boom*, 2013). When approved, Black and Latino applicants are 2.4 times more likely to receive a subprime loan than white applicants (Badger, *The Dramatic Racial Bias of Subprime Lending During the Housing Boom*, 2013).

Racially restrictive covenants

Racially restrictive covenants are clauses within property deeds that prevent specific people from buying or occupying land, often people of color such as Asian, Jewish and Black buyers. These covenants, at the time of their use, were legally enforceable contracts, prohibiting property owners, developers and realtors from selling or renting property to specified racial or ethnic groups. Those who broke the deed restrictions could lose claim to their property, be sued or be held financially liable (Seattle Civil Rights and Labor History Project, 2020).

Racially restrictive covenants became common after 1926, when the U.S. Supreme Court validated their use on the basis that they involved individuals entering into agreements of their own volition, rather than by government action. In 1948, the Supreme Court ruled that racial restrictions would no longer be enforced by courts (Seattle Civil Rights and Labor History Project, 2020). However, the ruling also acknowledged that these covenants, as private agreements, could continue to be used to exclude people from occupying or purchasing real estate on the basis of race, ethnicity or religion (Evans, 2022).

Congress later passed the Fair Housing Act in 1968, outlawing racial and ethnic discrimination in the sale or rental of housing. While racially restrictive covenants remain illegal to act on, they remain in many deeds across the country. In 2006, Washington Governor Christine Gregoire signed SB 6169, making it easier for homeowners' associations to remove racially restrictive covenants from their language. Similarly, in 2018, the Washington Legislature added a provision that enabled property owners to strike racial restrictions from their deeds and other property records.

A typical covenant found in many deeds in Seattle's Queen Anne neighborhood reads, "no person or persons of Asiatic, African or Negro blood, lineage, or extraction shall be permitted to occupy a portion of said property" (University of Minnesota, 2022). This language shifted over time, becoming less overt and simplified to read that housing could "be occupied exclusively by person or persons of the Caucasian Race" (University of Minnesota, 2022).

Redlining

In the late 1930s, the federal Home Owner's Loan Corporation (HOLC) evaluated mortgage risks in cities across the country, rating neighborhoods as "best," "still desirable," "definitely declining," or "hazardous" (Honig, 2021). Neighborhoods that were evaluated as being financially risky were marked in red—which gave way to the term "redlining"—and lenders were discouraged from financing property in those areas. Because neighborhood boundaries were often drawn along racial lines, this practice disproportionately prevented people of color from accessing credit and buying homes.

Following activist opposition in the 1970s, the Washington State Legislature passed HB 323, which outlawed financial institutions from denying or varying the terms of a loan because of a property's neighborhood (City of Seattle, n.d.).

While redlining was legally prohibited, it continues to have lasting negative impacts, as it contributed to the deprivation of investment in communities of color and limited access to lending services for BIPOC buyers.

Today, BIPOC households continue to have lower homeownership rates and net worth when compared to white households (United States Department of Justice, 2021). The gap in homeownership rates between white and Black households is larger today than it was in 1960, before the passage of the Fair Housing Act of 1968 (United States Department of Justice, 2021).

Steering

Steering is a form of housing discrimination in which a real estate professional influences buyers' decisions based on their race, religion or another characteristic protected by the 1968 Fair Housing Act. Although steering generally refers to homebuyers, it can also apply to those seeking rental or public housing. Steering can be found in many contexts and scales including within a building, a development complex or neighborhood. For example, it is illegal to restrict families with children to specific floors in a building, or to steer BIPOC buyers towards one neighborhood while discouraging them from others.

Steering based on race or ethnicity tends to increase price volatility and lower price appreciation in primarily BIPOC neighborhoods, thereby contributing to housing inequity and discrimination, widening economic gaps and reinforcing segregation. Although explicit housing discrimination has declined since the Fair Housing Act was passed, implicit discrimination—like racial steering—remains a common practice. For example, housing discrimination studies have found that BIPOC homebuyers are offered fewer housing options than white buyers and are less likely to be given opportunities to view homes in person (Zonta, 2019).

Systematic undervaluing of real estate in BIPOC neighborhoods

In 1938, the Federal Housing Administration issued its Underwriting Manual, which provided specific guidelines on using neighborhood racial and socioeconomic composition to evaluate the value of a property (The Conversation, 2020). Under the guidance of this manual, homes in communities of color were evaluated to be less valuable than identical homes in white communities. Later, in the 1960s and 1970s, federal legislation prohibited this practice, but allowed appraisers to use past sale prices to determine home values, thereby giving it lasting impact.

In current real estate markets, bias associating communities of color with financial risk persists, although real estate demand has suggested otherwise. A study from the Brookings Institution shows that homes in predominantly Black communities are valued at about half the price of homes in communities without Black residents, especially in neighborhoods that were redlined in the past (Perry, Rothwell, & Harshbarger, 2018). At the same time, Black homebuyers continue to purchase homes in neighborhoods where home value has changed at a slower rate than homes located in neighborhoods with predominantly white homeowners (Zonta, 2019). In 2017, home prices in neighborhoods with predominantly Black homeowners decreased by six percent since 2006, while home prices in neighborhoods with predominantly white homeowners increased by three percent (Zonta, 2019).

The systemic undervaluing of real estate in BIPOC neighborhoods contributes to the large—and growing—wealth gap between BIPOC and white households, as shown by research conducted by Rice University (Howell & Korver-Glenn, 2020). On average, white households hold 20 times more wealth than BIPOC households (Howell & Korver-Glenn, 2020). In addition, because property taxes, which pay for public services and infrastructure, are based on home values, lower home values in BIPOC neighborhoods have limited funding for schools, libraries, parks and utilities.

Urban renewal

Established by the Housing Act of 1949, federal urban renewal policies provided cities with funding to address derelict and unsafe buildings and invest in affordable housing and infrastructure projects. Lasting through the 1950s and early 1960s, urban renewal displaced more than one million people from their homes (Schwab, 2018). At its peak in the mid-1960s, urban renewal displaced a minimum of 50,000 families annually, and a report from the House of Representatives estimated that this figure should be cited as closer to 66,000 (Cebul, 2020). One 1965 report also found that “nonwhites had been forced into already crowded housing facilities, thereby spreading blight, aggravating ghettos, and generally defeating the social purpose of urban renewal” (Cebul, 2020).

Because urban renewal policy was designed to target neighborhoods that experienced divestment, it disproportionately impacted BIPOC and low-income residents. Although the program was meant to compensate displaced people by providing financial assistance, aid in relocation or placement into public housing units, this compensation was often late or not provided at all. Because displacement records were poorly kept or did not exist, cities could avoid providing compensation, as they had no way to know who displaced residents were (Cebul, 2020).

Although urban renewal practices did make some improvements, these were typically to the benefit of developers or wealthier suburbanites. Concurrently, urban renewal contributed to disproportionate home ownership for white residents, as white residents were incentivized to become homeowners, while BIPOC residents were moved to public housing and the rental market (Schwab, 2018).

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Appendix B. Data Sources

Federal resources

Census Bureau

United States Decennial Census

The United States census provides a complete count of the entire U.S. population every ten years. It is the most reliable population data available for small areas because it surveys the entire population of persons living in housing structures. Census data is limited to age, race, number of people in the household and housing type.

The U.S. Census Bureau compiles summary statistics for states, counties, census-designated places and additional smaller geographies. Information on the data collection procedures, accessing data and interpreting estimates is available at www.census.gov.

American Community Survey (ACS)

The American Community Survey (ACS) is an ongoing nationwide survey conducted by the U.S. Census Bureau in addition to the census. It is designed to provide communities with current data about how they are changing. The ACS collects information such as age, race, income, commute time to work, home value, veteran status and other important data from U.S. households. ACS data is commonly used for the Community Profile section of a housing needs assessment.

Because they represent statistical estimates based on responses from a sample of the total population, all ACS data are provided with a margin of error.⁷³ Reviewing margins of error is important for interpreting estimates. The margin of error indicates the range of the possible true values based on a 90% confidence interval. The margin of error reflects the number of reported data (the sample size) and the variation of data. Generally, estimates for larger populations will have greater reliability and less margin of error. Reviewing margin of error is particularly important when comparing estimates between communities, populations or trends over time. If your comparison shows a difference that is smaller than the margin of error, you are not able to reliably conclude that there is a valid difference.

The U.S. Census Bureau releases two kinds of ACS data products: 5-year estimates and 1-year estimates. The estimates reflect different sampling strategies with implications to be considered when using these data in a needs assessment.

⁷³ For a more detailed discussion of margin of error in the ACS, see <https://www.census.gov/programs-surveys/acs/guidance/training-presentations/acs-moe.html>.

Product	Description	Considerations
1-Year Estimates	Estimates are based on survey responses collected during a 12-month period.	<ul style="list-style-type: none"> Reflects data that are more current. May be more useful for analyzing areas with rapidly changing characteristics. Larger margin of error due to smaller sample size. Data is only available for areas with a population of 65,000 or greater.
5-Year Estimates	Estimates are based on survey responses collected during a 5-year period.	<ul style="list-style-type: none"> Less current information. May not be as suitable for analyzing themes that are changing rapidly (such as those relating to housing costs). Smaller margin of error due to larger sample size. Data is available for all communities in Washington state.

Users can also access American Community Survey data for individuals and housing units through the Public Use Microdata Sample (PUMS). PUMS data allow the user to create custom estimates not available in the ACS summary tables. PUMS data are available for the nation, regions, divisions, states and Public Use Microdata Areas (PUMAs). PUMS data provides greater flexibility for disaggregating data and identifying local patterns of racially disparate impacts. However, PUMAs largely do not follow city boundaries and often include multiple counties for areas outside of Seattle. For this reason, this guidance does not emphasize the use of the PUMS data.

On the Map

[OnTheMap](https://onthemap.ces.census.gov/)⁷⁴ is a web-based mapping tool useful for understanding the local workforce (demographic information about who works in your community), the work patterns of residents and commuting patterns. It uses a dataset called the LEHD Origin-Destination Employment Statistics⁷⁵ that includes data on job locations and residential locations and the connections between the two. It also provides companion reports on age, earnings, industry distributions, race, ethnicity, educational attainment and sex. The data set is limited to jobs that are covered by unemployment insurance as well as federal employees. More information can be found at <https://lehd.ces.census.gov/>.

U.S. Department of Housing and Urban Development

Comprehensive Housing Affordability Strategy (CHAS)

Each year, the U.S. Department of Housing and Urban Development (HUD) receives custom tabulations of ACS data from the U.S. Census Bureau. These data, known as the "CHAS" data ([Comprehensive Housing Affordability Strategy](#)⁷⁶), demonstrate the extent of housing problems and housing needs, particularly for low-income households. Local governments use CHAS data to plan how to spend HUD funds and may be used by HUD to distribute grant funds.

CHAS data groups households by income level relative to median family income (MFI). These data include adjustments to account for differences in household size to reflect the fact that the living expenses for a 1-person household are significantly less than those of a household of four. These adjustments are based on

⁷⁴ <https://onthemap.ces.census.gov/>

⁷⁵ LEHD stands for Longitudinal Employer-Household Dynamics data.

⁷⁶ <https://www.huduser.gov/portal/datasets/cp.html>

HUD's published household [income limits](#)⁷⁷ needed to qualify for income-restricted affordable housing that is set aside for households at a specified income level or below. [Washington State Housing Finance Commission](#)⁷⁸ publishes an expanded version of these income limits for each county in Washington state. An example for Kittitas County is shown in below. It shows that in 2022, a 1-person household with an annual income of \$40,000 would be considered to have an income just shy of 80 percent MFI, while a 4-person household with the same income would be considered to have an income between 50 percent and 60 percent MFI.

2022 HUD income limits for Kittitas County (median family income: \$85,800)

Set-aside percentage	1-person	2-person	3-person	4-person	5-person	6-person	7-person	8-person
20%	\$11,900	\$13,600	\$15,300	\$17,000	\$18,360	\$19,720	\$21,080	\$22,440
30%	\$17,850	\$20,400	\$22,950	\$25,500	\$27,540	\$29,580	\$31,620	\$33,660
35%	\$20,825	\$23,800	\$26,775	\$29,750	\$32,130	\$34,510	\$36,890	\$39,270
40%	\$23,800	\$27,200	\$30,600	\$34,000	\$36,720	\$39,440	\$42,160	\$44,880
45%	\$26,775	\$30,600	\$34,425	\$38,250	\$41,310	\$44,370	\$47,430	\$50,490
50%	\$29,750	\$34,000	\$38,250	\$42,500	\$45,900	\$49,300	\$52,700	\$56,100
60%	\$35,700	\$40,800	\$45,900	\$51,000	\$55,080	\$59,160	\$63,240	\$67,320
70%	\$41,650	\$47,600	\$53,550	\$59,500	\$64,260	\$69,020	\$73,780	\$78,540
80%	\$47,600	\$54,400	\$61,200	\$68,000	\$73,440	\$78,880	\$84,320	\$89,760

Source: Washington State Housing Finance Commission, [Income and Rent Limits for All Tax Credit and Bond Financed Properties, 2022](#). Retrieved from: <https://www.wshfc.org/managers/AMCLimits/Others/BoxInfo/2022RentIncomeLimitsYear.pdf>.

Affirmatively Furthering Fair Housing Tool

HUD's Affirmatively Furthering Fair Housing Tool (AFFHT) provides access to maps and reports that illustrates segregation trends, areas of concentrated poverty, disparity in housing needs and access to opportunity, and location and tenant characteristics of publicly supported housing for every HUD entitlement community in the country. Available at <https://egis.hud.gov/affht/>.

Center for Disease Control and Agency for Toxic Substances and Disease Registry (CDC/ATSDR)

⁷⁷ <https://www.huduser.gov/portal/datasets/il.html>

⁷⁸ <https://www.wshfc.org/managers/map.aspx>

Social Vulnerability Index (CDC/ATSDR SVI)

The CDC/ATSDR Social Vulnerability Index (CDC/ATSDR SVI) uses sixteen U.S. census variables to help local officials identify communities that may need support before, during or after disasters. The CDC/ATSDR SVI ranks each tract on 16 social factors, including poverty, lack of vehicle access and crowded housing, and groups them into four related themes. Each tract receives a separate ranking for each of the four themes, as well as an overall ranking. Available at <https://www.atsdr.cdc.gov/placeandhealth/svi/index.html>.

Washington resources

Washington State Office of Financial Management

The Office of Financial Management (OFM) publishes annual population estimates as of April 1 for each county. These are the official population counts for implementing the Growth Management Act. In addition to current population estimates, OFM develops a range of possible population growth projections for Washington counties, which inform the long-range planning housing targets.

- [April 1 Official Population Estimates](#)⁷⁹
- [Growth Management Act County Projections](#)⁸⁰

In addition to the official population estimates and projections, OFM provides data on community demographics, housing, the economy and other variables useful for conducting a housing needs assessment. See the OFM's [Washington Data and Research](#)⁸¹ page.

The Washington Center for Real Estate Research

The Washington Center for Real Estate Research (WCRER) provides county-level data and city-level data for cities with a population greater than 10,000 on the rental market, land availability and construction activity over time. WCRER publishes quarterly housing market snapshots for each county in Washington that includes an estimate of housing affordability, defined as the ability of a middle-income family to carry the mortgage payments on a median price home for each county in Washington state. Information is available on the Housing Market Data Toolkit webpage: <https://wcrer.be.uw.edu/housing-market-data-toolkit/>.

Washington Department of Health, Washington Environmental Health Disparities Map

The Washington State Department of Health, together with the University of Washington Department of Environmental & Occupational Health Sciences (DEOHS), compiles information on environmental health and hazard risk information for each census tract in Washington state. The dataset helps to identify which neighborhoods are most impacted by environmental pollution. For more information and access to the mapping tools, see the [Washington Environmental Health Disparities Map](#).⁸²

⁷⁹ <https://ofm.wa.gov/washington-data-research/population-demographics/population-estimates/april-1-official-population-estimates>

⁸⁰ <https://ofm.wa.gov/washington-data-research/population-demographics/population-forecasts-and-projections/growth-management-act-county-projections>

⁸¹ <https://ofm.wa.gov/washington-data-research>

⁸² <https://doh.wa.gov/data-and-statistical-reports/washington-tracking-network-wtn/washington-environmental-health-disparities-map>

Regional, county and local resources

Puget Sound Regional Council

The Puget Sound Regional Council (PSRC) [evaluated displacement risk in census tracts across the Puget Sound region in 2019](#).⁸³ Risk factors in this index include a variety of data points under the categories of socio-demographics, transportation qualities, neighborhood characteristics, housing and civic engagement. Areas indicated as higher displacement risk are those where vulnerable populations live or those where high value investments such as mass transit can increase real estate demand and drive up the cost of housing or commercial space. The highest risk areas will likely include a combination of both of these characteristics. In these high-risk areas, residents are most vulnerable to displacement when there are changes in zoning or an influx of capital investment. See PSRC's [technical documentation](#)⁸⁴ for more information.

PSRC also offers additional resources such as an [Opportunity Index](#)⁸⁵ and [measures of segregation](#)⁸⁶ with mapping tools, data and interactive reports. A list of other relevant data and research resources is on PSRC's Equity webpage: <https://www.psrc.org/our-work/equity>.

Fair housing assessments

The Fair Housing Act of 1968 protects people seeking homes from discrimination based on race, color, national origin, religion, sex, familial status and disability. The Fair Housing Act requires that recipients of federal housing and urban development funds take meaningful action to address housing disparities, including undoing segregated living patterns transforming racially and ethnically concentrated areas of poverty into areas of opportunity,⁸⁷ and fostering and maintaining compliance with civil rights and fair housing laws. Towards this end, HUD requires bodies receiving Community Development Block Grants to conduct analysis to identify impediments to fair housing choice within the jurisdiction and take appropriate actions to overcome the effects of any impediments identified through the analysis.

An example of an analysis of impediments to fair housing is the Pierce County Consortium's (2019) analysis. The analysis identified contributing factors to fair housing issues or impediments. The Pierce County Consortium consists of 19 cities and towns and the unincorporated areas of Pierce County. The [report](#)⁸⁸ is available on Pierce County's website.

Consolidated plans

Jurisdictions receiving funds from HUD's Community Development Block Grant (CDBG) Program, HOME Investment Partnerships (HOME) Program, Housing Trust Fund (HTF) Program, Emergency Solutions Grant (ESG) Program, and Housing Opportunities for Persons with AIDS (HOPWA) Program are required to develop

⁸³ <https://www.psrc.org/our-work/displacement-risk-mapping>

⁸⁴ <https://www.psrc.org/media/1780>

⁸⁵ <https://www.psrc.org/our-work/opportunity-mapping>

⁸⁶ <https://www.psrc.org/our-work/racial-residential-segregation>

⁸⁷ "Areas of opportunity" is a commonly used phrase that has different meanings in different contexts. In some cases it refers to "Opportunity Zones" as defined by the [Tax Cuts and Jobs Act of 2017](#), in other cases it means areas with greater job or educational opportunity. However, the phrase is not without controversy in its application. When the term is used to describe one neighborhood – typically wealthier, whiter neighborhoods – as better than less white and less wealthy neighborhoods, it ignores the structural and systemic forces that provide resources to white communities and disinvest in communities of color and can reinforce long-standing harmful narratives about BIPOC communities.

⁸⁸ <https://www.piercecountywa.gov/DocumentCenter/View/84977/Analysis-of-Impediments-to-Fair-Housing-Choice---Final?bidId=>

consolidated plans according to HUDs planning framework described in the [code of federal regulations](#).⁸⁹ The consolidated planning framework helps states and local jurisdictions to assess their affordable housing and community development needs and market conditions, and to make data-driven, place-based investment decisions.

Commercial and other resources

PolicyMap

PolicyMap is a web-based tool that provides access to data from the U.S. Census Bureau, along with other data sources. The platform offers some tools in its public access version, as well as a subscription model for greater data and functionality. It includes a range of data variables including demographics, economic, housing, lending, education and quality of life, among others. The platform also offers easy access to measures of racial diversity, segregation, housing cost burden, subsidized housing points and other factors for determining racially disparate impacts. More information is available at <https://www.policymap.com/>.

The Evictions Lab

The Evictions Lab provides nationwide eviction data to explore the prevalence of evictions. The data are compiled from formal eviction court records combined with demographic information from the U.S. Census. The “modeled” data includes synthesized data to provide a data on all U.S. states and counties. The “original” data includes estimates for counties, cities, census tracts and block groups. See <https://evictionlab.org/>.

⁸⁹ <https://www.ecfr.gov/current/title-24/subtitle-A/part-91>

Appendix C. Technical Guidance on Data Analysis

Introduction

This document provides technical guidance on conducting data analysis for an assessment of racially disparate impacts, exclusion, displacement and displacement risk in housing to be used for updating the housing element of the comprehensive plan.

Each topic includes potential measures, example analysis and data sources available to jurisdictions to conduct their analysis. The guidance provides information on free, off-the-shelf data tools where possible.

Direct measures of racially disparate impacts in housing	Indirect measures of racially disparate impacts in housing	Measures of exclusion in housing	Measures of displacement
<ul style="list-style-type: none"> • Homeownership • Housing cost burden • Overcrowding • Neighborhood access • Fair housing testing 	<ul style="list-style-type: none"> • Disparities in environmental health hazards • Commute burden • Life expectancy • Educational access 	<ul style="list-style-type: none"> • Residential racial composition • Segregation and integration • Dot density or dot distribution maps • Dissimilarity index • Location quotient • Comparison of workforce and residential population • Jobs to housing ratio • Comparison of workers and residents • Concentration of dispersion of affordable housing 	<ul style="list-style-type: none"> • Foreclosures • Eviction • Loss of housing units • By type of housing unit • By affordability level • Closure of manufactured home parks • Expiring affordable housing covenants • Eminent domain or condemnations • Condominium conversion applications • Deterioration in housing quality
Examples of displacement risk analysis			
<ul style="list-style-type: none"> • PSRC's Displacement Risk Mapping • Portland's Gentrification and Displacement Study • Walla Walla Regional Housing Action Plan 			

Measures of racially disparate impacts

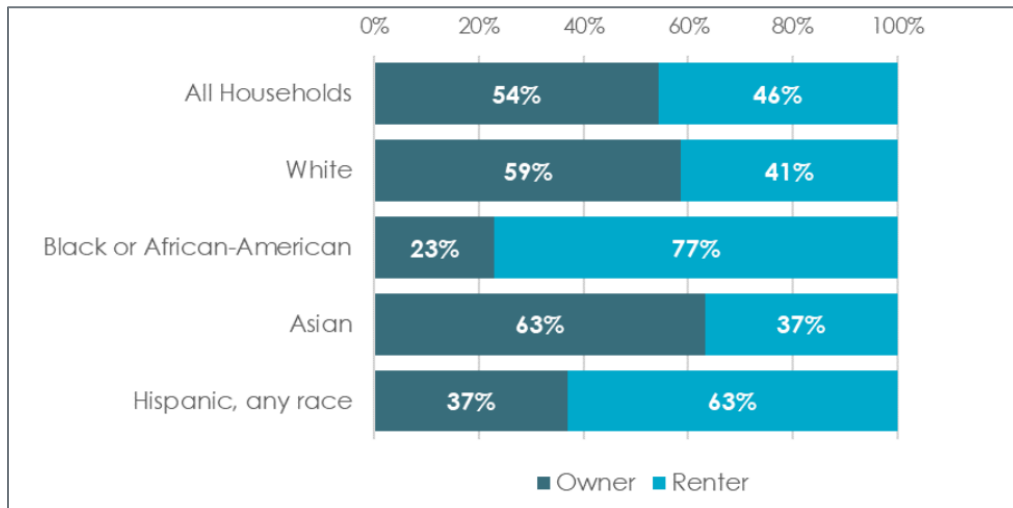
Direct measures of racially disparate impacts in housing

Homeownership

The American Community Survey (table B25003) estimates the total occupied housing units and owner-occupied housing units for an area disaggregated by race and Hispanic or Latino origin of the householder. Exhibit 16 presents the rates of homeownership between racial and ethnic groups in Lynnwood (2018). The data demonstrates a racially disparate impact in homeownership among Black or African-Americans and Hispanics (of any race) when compared to White and Asian households. Commerce recommends that the presentation of data describing differences observed by race include accompanying reference to the historical and current injustices that have undermined homeownership for marginalized groups.

Younger residents (under age 35) are generally less likely to be homeowners than older residents are. Cross checking with the age profile of racial or ethnic groups' demographics should also be considered in interpretation of patterns of homeownership estimates. Some differences in homeownership rates may be due to the age distribution of each race and ethnicity category. This information is in ACS table S2502.

Exhibit 16. Homeownership by race and ethnicity, City of Lynnwood, 2018



Note: White, Asian, and Black or African American households include both Hispanic and non-Hispanic ethnicity.
Sources: American Community Survey 5-year estimate (Table B25003), 2014-2018; BERK Consulting, 2020.

Data sources:

- ACS Table S2502 (Demographic Characteristics for Occupied Housing Units)
- ACS Table B25003 (Tenure): Racial subgroups are available in sub tables A-I. Exhibit 17 includes a list of tables desegregated by race provided by the US Census Bureau. (B25003A Tenure (white alone householder), B25003B Tenure (Black or African American alone householder), B25003C Tenure (American Indian and Alaska Native alone), B25003D Tenure (Asian alone householder), B25003E Tenure (Native Hawaiian and Other Pacific Islander alone householder), B25003F Tenure (some other race alone householder), B25003G Tenure (two or more races householder), B25003H Tenure (white alone, not Hispanic or Latino householder), B25003I Tenure (Hispanic or Latino Householder))

- HUD [CHAS](#)⁹⁰(Comprehensive Housing Affordability Strategy, HUD): Estimates of households by race are in Table 9 (2015 - 2019 data set released September 2022)
- [Policy Map](#)⁹¹ allows a user to create simple maps of the number of homeowners and renters by race, but extracting the numbers requires a subscription.

Exhibit 17. U.S. Census detailed tables disaggregated by race and ethnicity, 2020 5-year estimates

ID	Title	Universe (Population)	5-year geography restrictions (with summary levels in parentheses)
Community profile variables			
B01001	Sex by age	Total Population	Excludes Block Group (150, 258, 293, 294)
B01002	Median age by sex	Total Population	Excludes Place/Remainder (070)
B05003	Sex by age by nativity and citizenship status	Total Population	Excludes Block Group (150, 258, 293, 294)
B07004	Geographical mobility in the past year for current residence in the United States	Population 1 year and over	Excludes Block Group (150, 258, 293, 294)
B11001	Household type (including living alone)	Households	Excludes Place/Remainder (070)
B16005	Nativity by language spoken at home by ability to speak English for the population 5 years and over	Population 5 years and over	Excludes Block Group (150, 258, 293, 294)
B19001	Household income in the past 12 months (in 2020 inflation-adjusted dollars)	Households	Excludes Block Group (150, 258, 293, 294)
B19013	Median household income in the past 12 months (in 2020 inflation-adjusted dollars)	Households	Excludes Block Group (150, 258, 293, 294)
B19025	Aggregate household income in the past 12 months (in 2020 inflation-adjusted dollars)	Households	Excludes Place/Remainder (070)
B08105	Means of transportation to work	Workers 16 years and over	Excludes Block Group (150, 258, 293, 294)
B08505	Means of transportation to work for workplace geography	Workers 16 years and over	Workplace geography excluding: Place/Remainder (070) and County within Place (155)
Housing characteristics			
B25003	Tenure	Occupied housing units	Excludes Place/Remainder (070)
B25014	Occupants per room	Occupied housing units	Excludes Block Group (150, 258, 293, 294)

⁹⁰ <https://www.huduser.gov/PORTAL/datasets/cp.html>

⁹¹ <https://www.policymap.com/newmaps#/>

ID	Title	Universe (Population)	5-year geography restrictions (with summary levels in parentheses)
B25032	Units in Structure	Occupied housing units	Excludes Block Group (150, 258, 293, 294)
B26103	Group quarters type (3 types)	Total Population	United States (010), Region (020), Division (030), State (040)
B26203	Group quarters type (5 types)	Total Population	United States (010)

Source: U.S. Census Table Shells and Table List, <https://www.census.gov/programs-surveys/acs/technical-documentation/table-shells.2020.html>

Housing cost burden

One of the best indicators of a community's unmet housing need is the number of households that are experiencing housing "cost-burden," that is households that are paying more than 30 percent of their income on housing.⁹² Households experiencing housing cost burden have limited resources left to pay for other life necessities such as food, clothing, medical care, transportation and education. They are also at higher risk of displacement when housing costs rise or life circumstances change. The risks increase in severity for lower income households in which remaining income may not cover basic needs.

The best source of data on cost-burdened households is the HUD CHAS data. HUD's Data Query Tool⁹³ lets you select a county or Census-defined place of interest (such as a city) for which it returns a summary of common cost burden statistics by income level and housing tenure.

Lower income households must compete with higher income households, and are thus more likely to spend a greater proportion of their income on housing and experience housing cost burden. However, it is not uncommon for households at all income levels to experience housing cost burden at some time in their lifespan.⁹⁴ Analyzing disparities in housing cost burden can inform the development of tenant protection measures targeted to those most at risk of displacement. Disaggregating data by race can provide insight to racially disparate impacts in the community.

HUD's Data Query Tool does not offer the option to query data on housing cost burden by race, so data must be accessed through the source table. For the 2020 data release (September 2022), estimates by racial groups are provided in Table 9.

For the place level-data, you can set up an analysis table as shown in Exhibit 18.

⁹² The U.S. Department of Housing and Urban Development (HUD) considers housing to be affordable if it costs less than 30 percent of a household's income. Households paying more than 30 percent of their income for housing are housing cost-burdened, while households paying more than 50 percent are severely cost-burdened. The 30% threshold is the standard commonly used in policy and research on housing needs. Recent research by Zillow suggests that the threshold is still relevant, particularly for lower-income households. See "[Homelessness Rises Faster Where Rent Exceeds a Third of Income](https://www.zillow.com/research/homelessness-rent-affordability-22247/)" available at <https://www.zillow.com/research/homelessness-rent-affordability-22247/>.

⁹³ <https://www.huduser.gov/portal/datasets/cp.html>

⁹⁴ Analysis of income patterns can complement the analysis of patterns in housing cost burden. ACS Table S1903 provides median income by race.

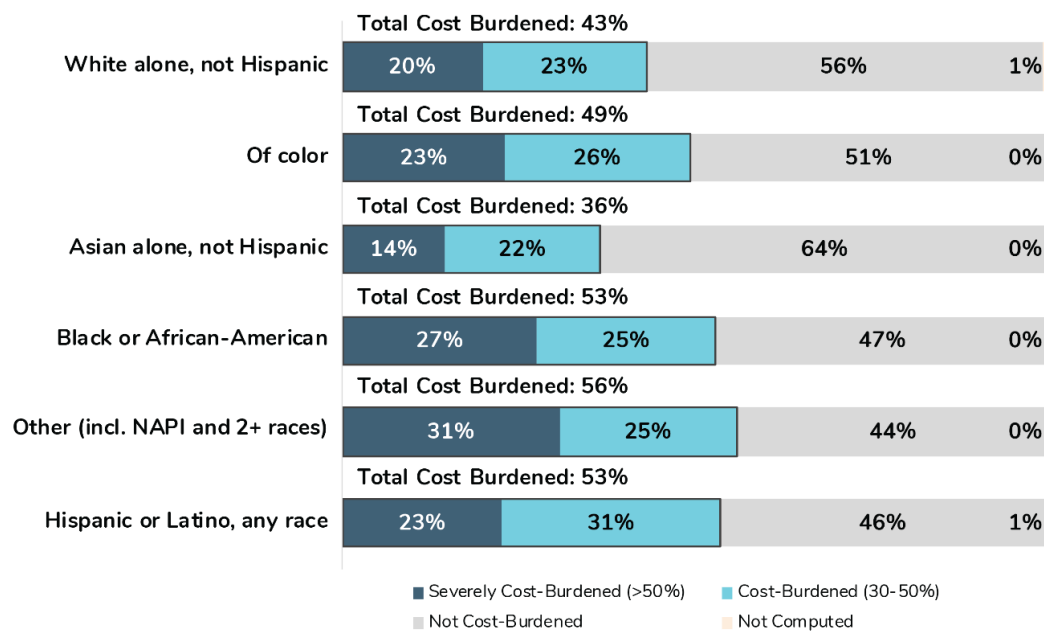
Exhibit 18. CHAS table structure for analyzing cost burden by racial group names for owner households, CHAS 2015 – 2019

Category	White alone, non-Hispanic	Black or African-American alone, non-Hispanic	Asian alone, non-Hispanic	American Indian or Alaska Native alone, non-Hispanic	Pacific Islander alone, non-Hispanic	Hispanic, any race	Other (including multiple races, non-Hispanic)
Not cost burdened	T9_est4	T9_est9	T9_est14	T9_est19	T9_est24	T9_est29	T9_est34
Cost-burdened (30-50%)	T9_est5	T9_est10	T9_est15	T9_est20	T9_est25	T9_est30	T9_est35
Severely cost-burdened (>50%)	T9_est6	T9_est11	T9_est16	T9_est21	T9_est26	T9_est31	T9_est36
Not calculated	T9_est7	T9_est12	T9_est17	T9_est22	T9_est27	T9_est32	T9_est37

Category	White alone, non-Hispanic	Black or African-American alone, non-Hispanic	Asian alone, non-Hispanic	American Indian or Alaska Native alone, non-Hispanic	Pacific Islander alone, non-Hispanic	Hispanic, any race	Other (including multiple races, non-Hispanic)
Not cost burdened	T9_est40	T9_est45	T9_est50	T9_est55	T9_est60	T9_est65	T9_est70
Cost-burdened (30-50%)	T9_est41	T9_est46	T9_est51	T9_est56	T9_est61	T9_est66	T9_est71
Severely cost-burdened (>50%)	T9_est42	T9_est47	T9_est52	T9_est56	T9_est32	T9_est67	T9_est72
Not calculated	T9_est43	T9_est48	T9_est53	T9_est57	T9_est63	T9_est68	T9_est73

From these estimates, you can chart patterns in housing cost burden by different racial categories. Exhibit 19 presents an example from the City of Renton.

Exhibit 19. Rates of cost burden by race of householder, City of Renton, 2016



Source: HUD CHAS (based on ACS 2012-2016 5-year estimates); BERK, 2021

Data sources:

- HUD CHAS data: Estimates of household by race are in Table 9 (2015 - 2019 data set released September 2022).
- ACS Table S2503 (Financial Characteristics) provides monthly housing costs as a percentage of household income in the past 12 months by income group for both renters and owners, but not disaggregated by race.
- [National Equity Atlas](https://nationalequityatlas.org/indicators/Race-ethnicity#/)⁹⁵ allows querying of data by race for some Washington counties (Clark, King, Kitsap, Pierce, Snohomish, Spokane, Thurston, Whatcom, Yakima) and cities (Spokane, Seattle).

Overcrowding

Overcrowding is about the relationship between the number of people and the size of the housing unit. It is different than household size, which is the number of people regardless of the size of the housing unit. Overcrowding is associated with negative health impacts related to physical health, mental health and personal safety (HUD, 2007). The most used definition of overcrowding is more than one person per room in a dwelling unit. The room number includes all rooms in the housing unit, not just the bedrooms.

Overcrowding can be an indication that the available housing stock is too expensive relative the purchasing power of households or does not match household sizes. Reviewing overcrowding rates by race and ethnicity may indicate disparities in housing impacts. Knowing communities that are experiencing overcrowding in the community can help inform mitigating strategies to prevent negative health or educational impacts. Community engagement with households who are experiencing overcrowding can help differentiate the role of housing deficiencies from culturally driven choices related to family structure and living arrangements.

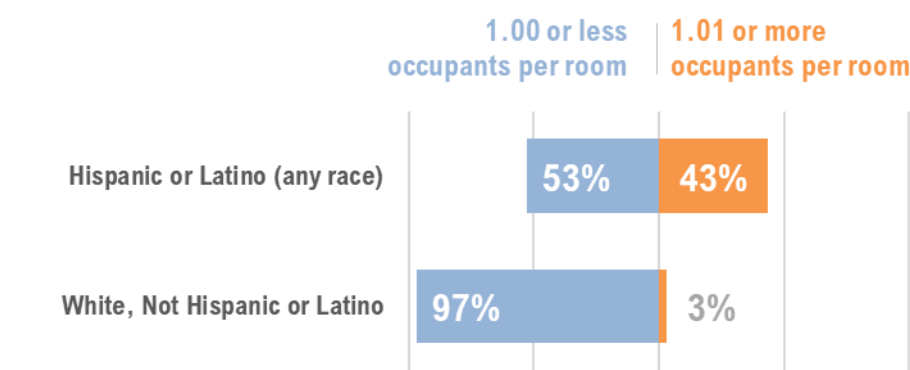
The ACS Table B25014 and subtables A – I provide estimates on occupants per room disaggregated by the race of the householder. This information can be used to understand differences in overcrowding among different populations. Exhibit 20 provides an example analysis from the City of Yakima (2020 data) comparing

⁹⁵ <https://nationalequityatlas.org/indicators/Race-ethnicity#/>

rates of overcrowding between Hispanic or Latino households and White, non-Hispanic or Latino households. In this case, 43% of Hispanic or Latino households have 1.01 or more occupants per room, a rate much higher than the White, Not Hispanic or Latino group.

When analyzing overcrowding as a metric, consult with communities who have higher occupancy rates to understand how to achieve more equitable outcomes in housing. Multi-generational and extended familial housing are not inherently bad and can be responses to a housing market that fails to provide adequate housing or housing in preferred configurations.

Exhibit 20. Occupants per room, City of Yakima, 2020



Source: ACS B250141H and B25014I, 2022

Data sources:

- ACS Table B25014H and B25014I (Occupants per Room)

Neighborhood access

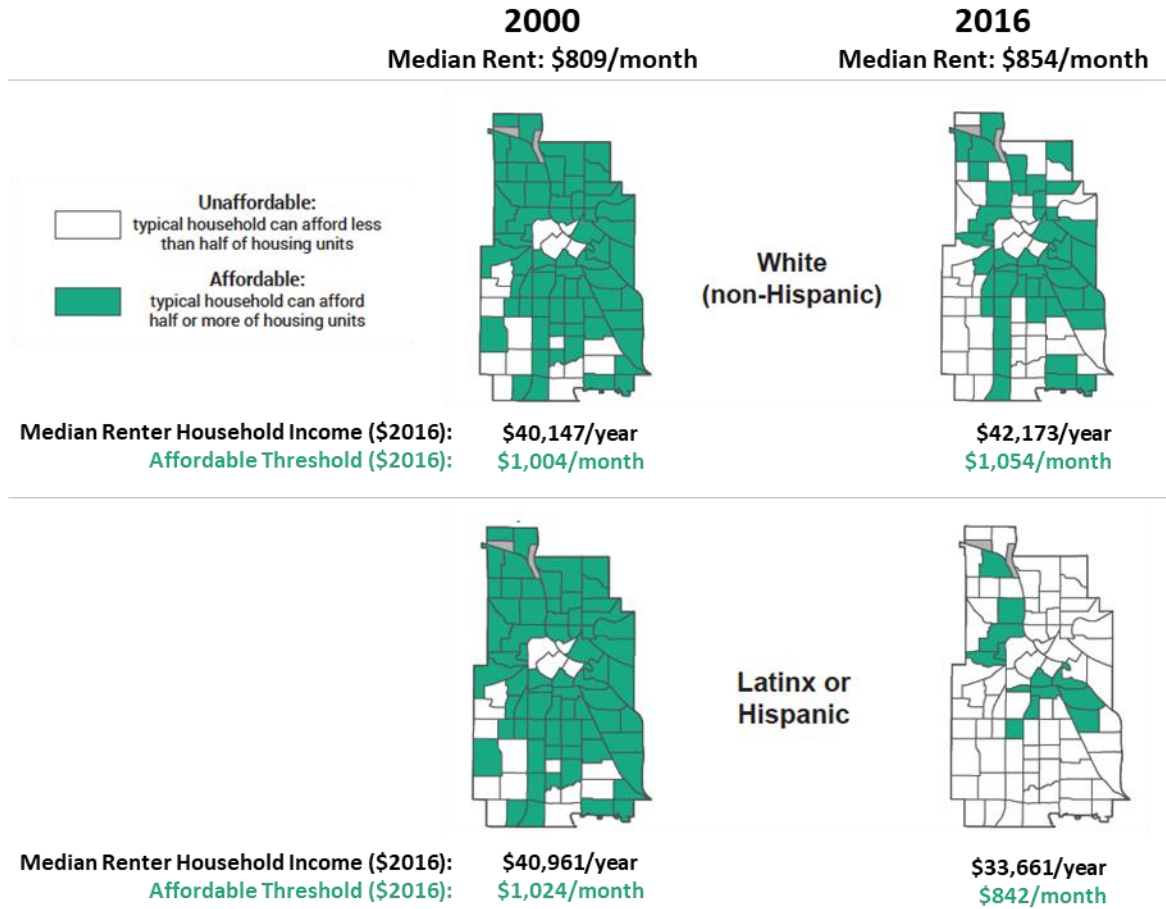
Neighborhood access is the ability of a household to access housing in a specific neighborhood. Neighborhood access can be assessed by comparing household incomes to housing costs. Long standing patterns of discrimination in housing, lending and community investment has contributed to racial disparities in household income and housing equity. Regulations that prohibit the inclusion of housing affordable to a variety of household incomes in well-resourced communities and regulations that steer affordable housing into distressed or under-resourced neighborhoods can effectively limit geographic choice for BIPOC households.

Analyzing the areas of the city accessible by racial groups based on patterns of household income can help to identify areas of the city that are functionally inaccessible to different racial groups or how the level of accessibility has changed over time. The analysis answers the basic question: in what areas of the jurisdiction can a household with median income afford the median rent? Comparing the outcome of this analysis across racial groups can demonstrate whether land use policies are in effect creating a racially disparate impact or are exclusionary.

Minneapolis, Minnesota conducted this analysis as part of its 2016 – 2017 comprehensive plan update. The analysis evaluated the areas in which the typical household can afford half or more of housing units (affordable) to areas in which they can afford less than half of housing units (unaffordable). Exhibit 21 presents the results for the White (non-Hispanic) population and the Latinx or Hispanic population. In 2000, there were areas of the city in which a typical household income for both groups could not afford the typical

rent. While affordability constraints affected both groups, the geographic extent that became “unaffordable” between 2000 and 2016 was greater for Latinx or Hispanic households.

Exhibit 21. Areas affordable to a household with median income for White (non-Hispanic) households and Latinx or Hispanic households, City of Minneapolis, Minnesota, 2016



Source: Center for Urban & Regional Affairs (CURA), University of Minnesota, June 2018. Calculations use IPUMS income data and gross rent costs from Census 2000 and ACS 5-year Survey (2012-2016), block group-level data aggregated to Minneapolis neighborhoods.

Median gross rents at the census tract level are available in ACS Table DP04. Zillow and Redfin also provide market data for both rental properties and properties for sale. If using Zillow, a jurisdiction may choose to look at the 35% rent cost market rate⁹⁶ for a neighborhood to understand what is available in the area for lower cost options. Median income by race and ethnicity is available in ACS Table S1903. CHAS is also an option for income data collection that takes household size into account.

Data sources:

- ACS Tables DP04 (Selected Housing Characteristics) and S1903 (Median Income in the past 12 Months)
- HUD CHAS data: Provides households grouped by ratios to Area Median Income. Data also accounts for household size.

⁹⁶ Zillow publishes average rents and rents at the 35th percentile.

- Market data by Zillow or Redfin

Fair housing testing

The Fair Housing Act of 1968 protects people seeking homes from discrimination based on race, color, national origin, religion, sex, familial status and disability. The Fair Housing Act requires that recipients of federal housing and urban development funds take meaningful action to address housing disparities caused by both public and private actions. This includes undoing segregated living patterns, transforming racially and ethnic concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. An Analysis of Impediments to Fair Housing Choice (Analysis of Impediments) analyzes the barriers to fair housing choice and informs policy priorities and funding decisions to overcome unfair housing practices. HUD provides a clear assessment structure, data and mapping tools to assist local jurisdictions in conducting their analysis of impediments to fair housing.⁹⁷

An Analysis of Impediments⁹⁸ provides useful information for assessing possible racially disparate impacts and exclusion in housing. An Analysis of Impediments will generally include demographic data, a profile of housing, analysis of segregation, assessment of housing needs and other information relevant to housing access. An Analysis of Impediments will include quasi-experimental testing of lending and renting practices and an analysis of fair housing complaint data.

In 2019, the Pierce County Consortium conducted an analysis of impediments to fair housing choice⁹⁹ that meets the requirements of HUD's Assessment of Fair Housing rules (AFH).¹⁰⁰ The analysis identified contributing factors to fair housing issues or impediments. Exhibit 22 presents the study's findings of factors that contributed to the identified fair housing issues. The issues are prioritized according to their impact on fair housing choice. The Analysis of Impediments study provides important baseline information to help identify policies that contribute to racially disparate impacts and exclusion.

Exhibit 22. Contributing factors to identified fair housing issues and impediments, Pierce County Consortium, 2019

Contributing factors to fair housing issues	Priority	Justification
Insufficient affordable housing in a range of unit sizes	High	The rate of housing problems for households at or below 30 percent HUD Area Median Family Income (HAMFI) in the Consortium exceeds 78.1 percent. This impacts 14,056 households Consortium-wide.

⁹⁷ HUD's Affirmatively Furthering Fair Housing resources (<https://egis.hud.gov/affht/>) provides mapping tools to assess patterns and trends related to segregation, housing problems, availability of publicly support housing data, school proficiency, proximity to jobs, disability, housing tenure and location of affordable rental units.

⁹⁸ Analysis of Impediments are required for jurisdictions that receive some federal HOME or CDBG funds (typically counties).

⁹⁹ The [Pierce County Consortium](#) consists of 19 cities and towns and the unincorporated areas of Pierce County. The Analysis of Impediments to Fair Housing pertains to the cities and unincorporated areas of Pierce County with the exception of Bonney Lake, Lakewood and Tacoma within Pierce County or the Pierce County portions of Auburn, Enumclaw and Pacific. The report, authored by Western Economic Services, is available on Pierce County's website:

<https://www.piercecountywa.gov/DocumentCenter/View/84977/Analysis-of-Impediments-to-Fair-Housing-Choice---Final?bidId=>

¹⁰⁰ <https://www.federalregister.gov/documents/2015/07/16/2015-17032/affirmatively-furthering-fair-housing>

Contributing factors to fair housing issues	Priority	Justification
Renter households tend to have higher rates of housing problems	High	Some 48.5 percent of renter households experienced cost burden or severe cost burden in 2017.
Discriminatory patterns in lending	High	As demonstrated by 2008-2017 HMDA data, Black, Asian and Hispanic loan denial rates exceeded 15.6 percent, 15.3 percent, and 14.0 percent, respectively, compared with 10.8 percent for White households.
Failure to make reasonable accommodations	High	Disability is the number one cited fair housing complaint in the Consortium.
Lack of fair housing infrastructure	High	The fair housing survey and public input indicated a lack of collaboration among agencies to support fair housing.
Insufficient fair housing education	High	The fair housing survey and public input indicated a lack of knowledge about fair housing and a need for education.
Access to low poverty areas	High	Black households have lower access to low poverty areas [or less access to higher income areas] than White households in Pierce County, as demonstrated by low poverty indices.
Moderate to high levels of segregation	Medium	Native Hawaiian households had high levels of segregation and American Indians, Black and "Other" race households had moderate levels of segregation.
Access to proficient schools	Low	School proficiency index is lower for Black populations than White school proficiency, indicating inequitable access for Black households to proficient schools. However, The Pierce County Consortium has little control over increasing access on a large scale.

Source: Western Economic Services; 2019

Indirect measures of racially disparate impacts in housing

Disparities in housing outcomes drive disparate impacts in many other facets of life. One's health, educational access, recreational access and environmental risk exposure are all driven in large part by where one lives. Indeed, one's zip code is a strong indicator of life expectancy. Examining downstream effects of housing location and choice can help identify policies that may cause a racially disparate impact. The following are potential measures and data resources to help jurisdictions identify geographic disparities in their community.

Disparities in environmental health hazards

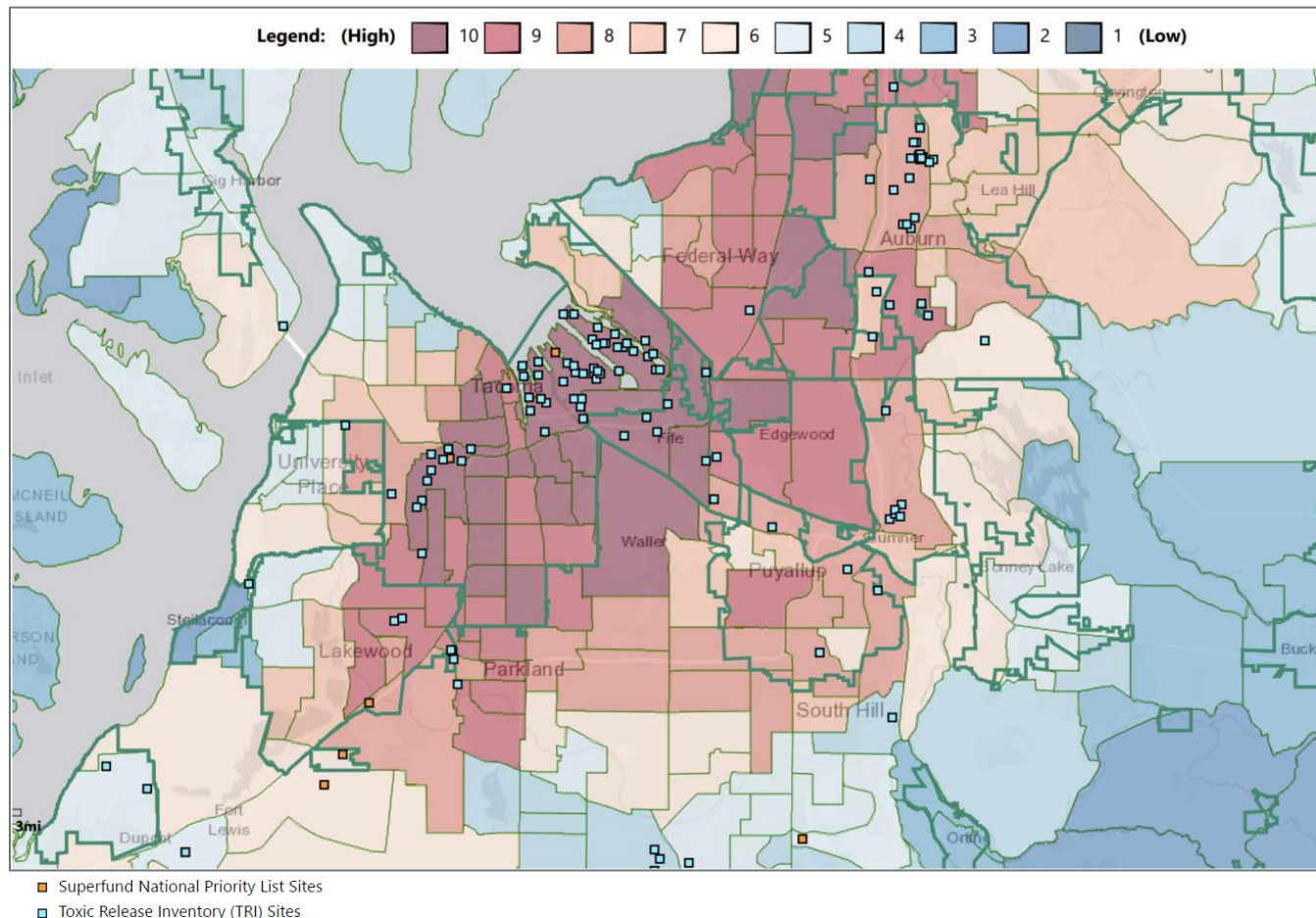
The Washington State Department of Health, together with the University of Washington Department of Environmental & Occupational Health Sciences (DEOHS), compiles information on environmental health and hazard risk information for each census tract in Washington state. The dataset allows the user to identify which areas are most impacted by environmental pollution. Exhibit 23 displays each census tract's ranking in environmental exposures as well as Superfund National Priority List sites and Toxic Release Inventory (TRI) Sites for Pierce County and the surrounding areas. The specific environmental exposures include:

- Diesel exhaust PM2.5 emissions
- Ozone
- Particulate matter (PM2.5)
- Toxic releases from facilities

- Proximity to heavy traffic roadways

This map shows that most of the areas of highest environmental risk are in the cities of Tacoma, Fife, Milton and Edgewood, as well as the unincorporated area of Midland. Comparing this map to the analysis of segregation presented in Exhibit 29 can reveal patterns in racially disparate impacts association with environmental pollution.

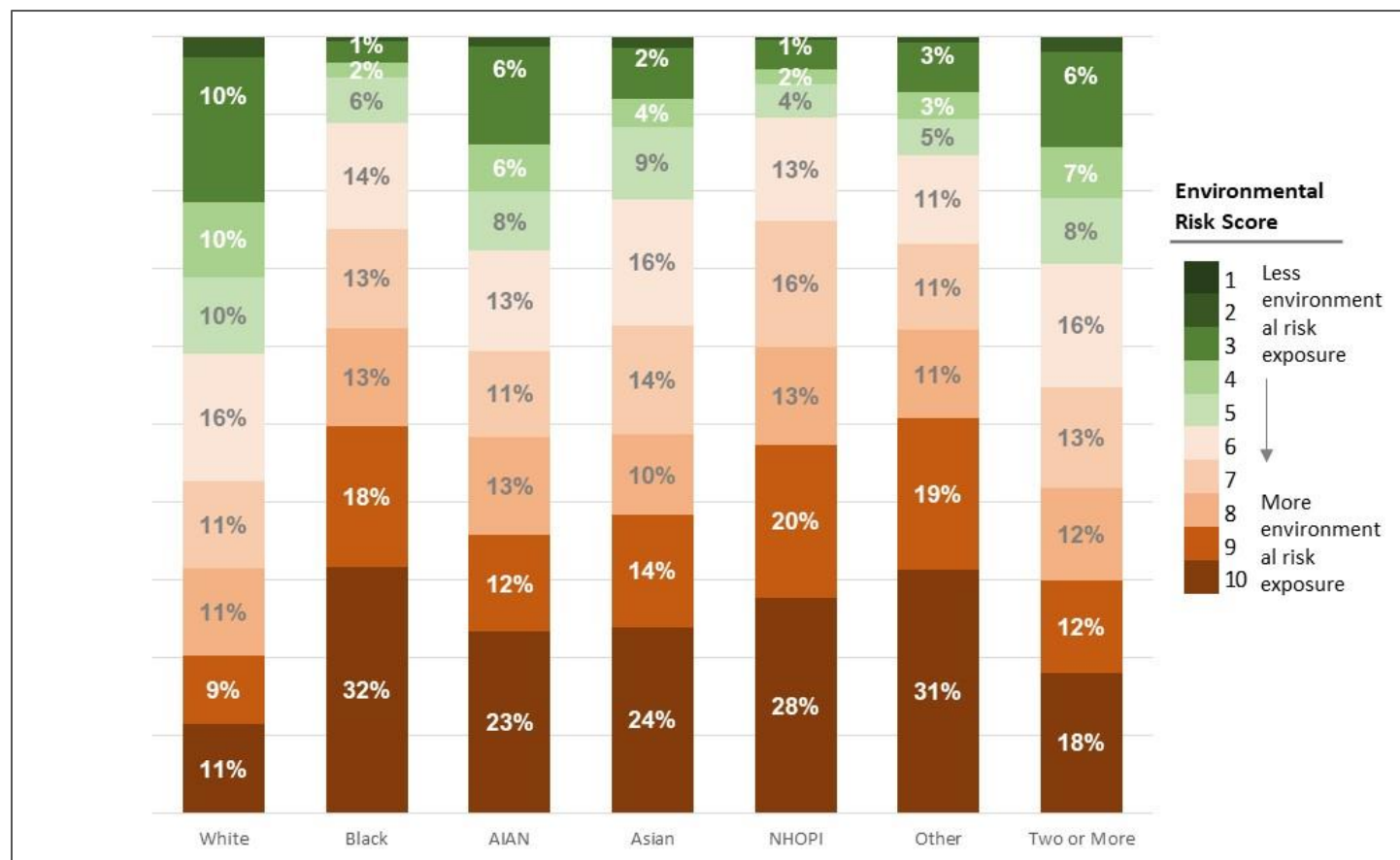
Exhibit 23. Environmental exposure risk index, Pierce County, 2022



Source: Washington Environmental Health Disparities Map, 2022 (variable data 2014 – 2020); BERK 2022

Exhibit 24 presents the proportion of each racial group living in census tracts by Environmental Risk Score. The proportion was calculated by summing the number of people of the racial group by census tract score, then calculating the percentage of the entire population of the racial group. People of color are more likely to live in a census tract with the highest exposure risk scores (risk scores of 8, 9 or 10) suggesting that people of color face a disproportionate burden of environmental exposure risk. Using the information in Exhibit 24 with the map presented in Exhibit 23 can help identify which neighborhoods and communities are most impacted, as well as the likely source of the environmental risk.

Exhibit 24. Distribution of environmental exposure risk by racial group, Pierce County, 2020



Source: Washington Environmental Health Disparities Map, 2022 (variable data 2014 – 2020); U.S. Decennial Census, 2020; BERK 2020

Data sources:

- Washington Environmental Health Disparities Map | Washington State Department of Health¹⁰¹
- U.S. Census 2020 Redistricting Data (PL 94-171) for population by census block. The Decennial Census provides the most accurate estimates of racial and ethnic identity at small geographic scales.

Commute burden

Different populations often experience different work commute lengths due to lack of affordable housing near job centers, inadequate transit and segregation impacts of historical housing policies. By examining travel time at the census tract level alongside race, ethnicity and income data, we can better understand how certain subgroups are impacted by commuting. This analysis can also inform future decisions around housing and transportation policy.

ACS Table B08303 provides estimates of travel time to work for each census tract. The data are not disaggregated by race, but can be mapped with data on racial composition to demonstrate which census tracts are most affected by long travel times and which subgroups tend to live in these census tracts. The

¹⁰¹ <https://doh.wa.gov/data-statistical-reports/washington-tracking-network-wtn/washington-environmental-health-disparities-map>

Census Bureau's OnTheMap tool is also a useful resource to see where people from different census tracts are commuting to and from: key information for transportation and housing planning. For communities over 65,000 people, the National Equity Atlas provides commute data by race and ethnicity subgroup.

Data sources:

- ACS Table B08303 (Travel Time to Work)
- [OnTheMap](#)¹⁰² (longitudinal employer-household dynamics (LEHD))
- [National Equity Atlas](#)¹⁰³ allows querying of data by race for some Washington counties (Clark, King, Kitsap, Pierce, Snohomish, Spokane, Thurston, Whatcom, Yakima) and cities (Spokane, Seattle).

Life expectancy

Life expectancy varies considerably across geographic locations and race and ethnicity subgroups. This disparity may be related to a range of factors, such as environmental hazards, healthcare access and quality, lifestyle influences, gender, access to safe and healthy housing, or income and economic opportunity. Reviewing census life expectancy patterns in conjunction with data on racial patterns can illuminate health disparities across a community. This background may help with decisions around dedicating resources and developing policies for equitable housing in key locations.

Data sources:

- The U.S. Small-area Life Expectancy Estimates Project (USALEEP) [interactive map](#)¹⁰⁴ provides life expectancy data at the census tract level.

Educational access

Assessment of educational access by race includes racial representativeness of children in higher performing schools compared to lower performing schools, locations of higher performing schools relative to racial composition of the surrounding neighborhood, and performance of student racial groupings, among other approaches.

The Washington State Office of Superintendent of Public Instruction (OSPI) provides information on student achievement, racial composition and indicators of school quality through the [Washington School Improvement Framework](#).

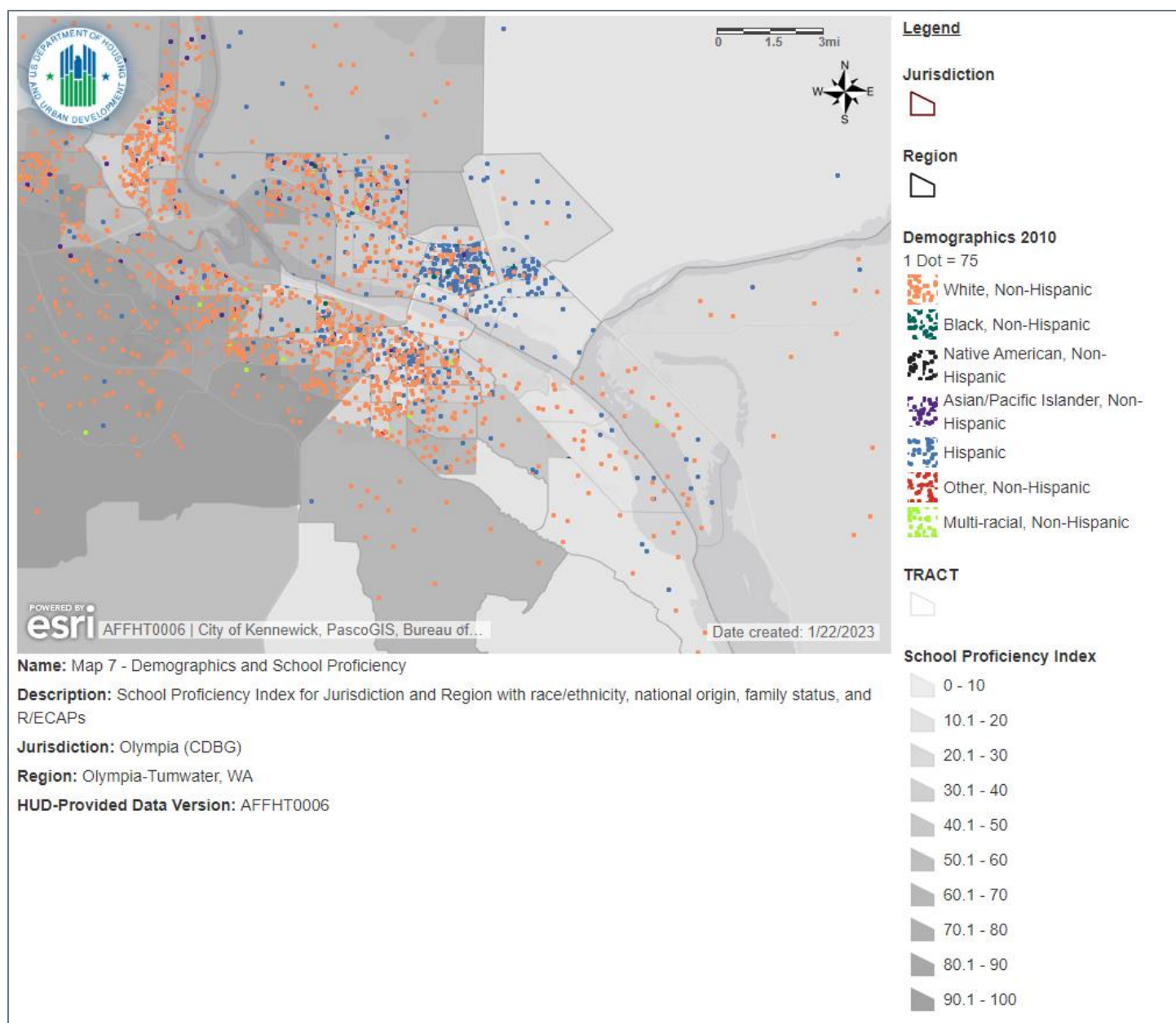
HUD's [Affirmatively Furthering Fair Housing resources](#) Map 7 maps a School Proficiency Index by block group. The School Proficiency Index uses school-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools. The values are the percentile ranked at the state level and range from 0 to 100. The higher the score, the higher the quality of the elementary schools in a neighborhood. Exhibit 25 presents an example analysis for the Tri-Cities area of Washington (Richland, Pasco and Kennewick). This map includes the option of a dot density layer reflecting the racial distribution in 2010. The map reveals that areas with larger proportions of people who are Hispanic, such as Pasco and the northern parts of Kennewick, have lower School Proficiency Index scores than areas to the west that have populations that are proportionally more white. Additional analysis at the school level, including community input on barriers to education and school input on the building-level challenges, can help identify root causes of these disparities.

¹⁰² <https://onthemap.ces.census.gov/>

¹⁰³ https://nationalequityatlas.org/indicators/Commute_time#/?geo=04000000000053053

¹⁰⁴ <https://www.cdc.gov/nchs/data-visualization/life-expectancy/>

Exhibit 25. School Proficiency Index and racial composition, City of Kennewick, 2018



Source: AFFH Tool, 2018

Data sources:

- Washington School Improvement Framework¹⁰⁵ (for school quality)
- HUD's Affirmatively Furthering Fair Housing Tool,¹⁰⁶ including Map 7 (Demographics and School Proficiency)
- OSPI¹⁰⁷ for racial composition of students (search "race")

¹⁰⁵ <https://www.k12.wa.us/policy-funding/grants-grant-management/every-student-succeeds-act-essa/washington-school-improvement-framework>

¹⁰⁶ <https://egis.hud.gov/affht/>

¹⁰⁷ <https://www.k12.wa.us/data-reporting/data-portal>

Measures of exclusion in housing

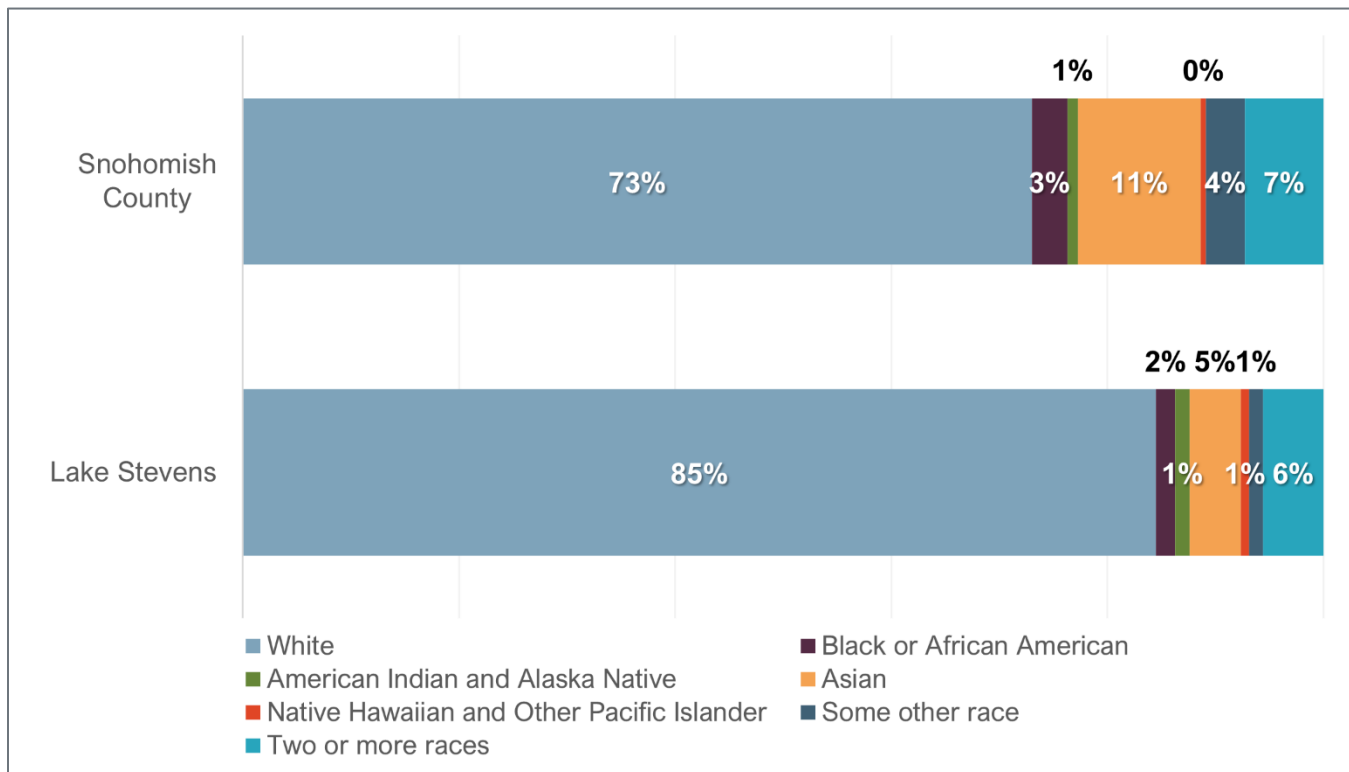
Exclusion refers to the act or effect of shutting or keeping certain populations out of housing within a specified area, in a manner that may be intentional or unintentional, but which nevertheless leads to non-inclusive impacts.

Current housing patterns are largely a product of federal, state and local housing policies that served to segregate communities by excluding specific populations from specific neighborhoods. In some cases, patterns of segregation are reflected in the uneven distribution of racial groups among neighborhoods within a jurisdiction. In other cases, jurisdictional boundaries were drawn to exclude specific populations. In the latter, comparing the racial composition of the jurisdiction to a larger reference area can illuminate historical patterns of exclusion. Concentrations of BIPOC households may indicate ongoing exclusion of these subgroups in other areas, suggesting potential disparities in access to services and opportunity.

Residential racial composition

Land use regulations may be creating an exclusionary effect when the racial composition of a city varies dramatically from the racial composition of the county in which it is located. For example, Exhibit 26 compares the racial composition of the City of Lake Stevens to the countywide composition (inclusive of Lake Stevens). Both jurisdictions are majority-white, but there is a discrepancy of twelve percentage points between the city and the county. Further analysis and community engagement is needed to determine how land use policies of Lake Stevens might impose higher barriers on BIPOC households.

Exhibit 26. Comparison of population distribution by race, Lake Stevens and Snohomish County, 2020



Source: US Census Bureau, 2016-2020 American Community Survey 5-Year Estimates

Data sources:

- ACS Table S2502 (Demographic Characteristics for Occupied Housing Units)

Segregation and integration

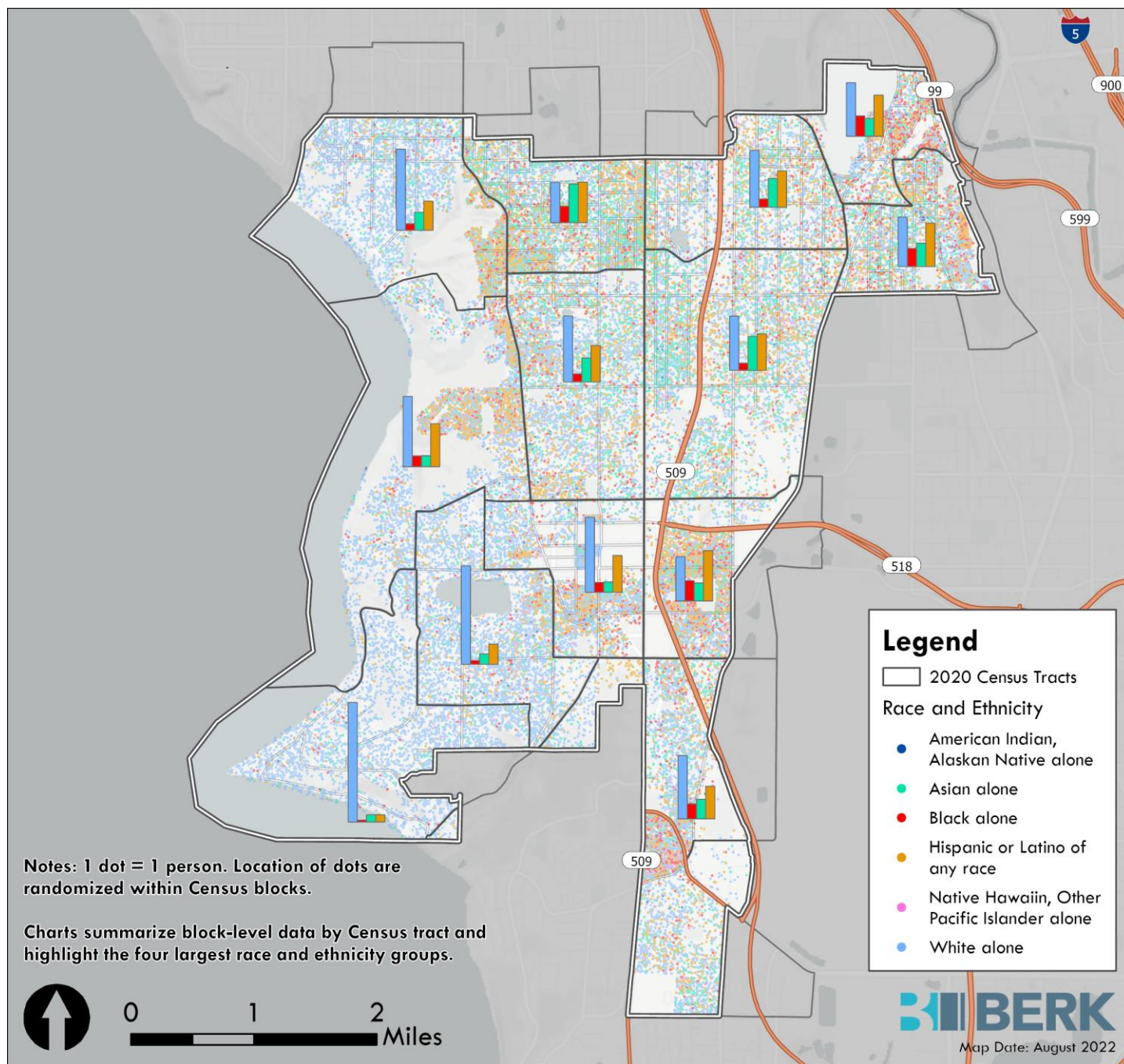
Dot density or dot distribution maps

A race dot density map uses a point to symbolize the presence of a person, with different racial identities reflected with different color dots. The dot can represent one person or multiple people (for example, 1 dot = 50 people). When using decennial census or ACS data, the dots are often associated with a specific geographic unit and displayed randomly within the unit. For example, if one dot represents 20 people, and there are an estimated 200 people in the census block group, the map would show 10 dots randomly placed within that census block group. The effect of clustering indicates relative areas of density, and when visualized by race and ethnicity, dot density maps can show relative concentrations of specific demographic groups along with areas of higher or lower overall demographic diversity. Exhibit 27 presents a dot density map example for the City of Burien using decennial census data.

A dot density map relies on the same data and geographies that are often used to produce more common choropleth (or “heatmap”) maps of race and ethnicity. The advantage of a dot density map is that it can visualize every race and ethnicity at once, facilitating the ability to identify relative community concentrations, density and diversity, as described above. Dot density maps can be produced using common GIS software or open-source techniques. After gathering population data at a particular Census geography (e.g., block group or tract), convert the population estimates for each demographic group into randomized dots within the boundaries of each geographic unit, using a standard dot-to-population ratio (e.g., 1:1, 1:10, 1:50, etc.). Symbolizing the dots with distinct colors, by race or ethnicity, will highlight notable population trends.

For example, Exhibit 27 shows that the lower density neighborhoods closer to the Puget Sound have the least racial diversity, with high proportions of White residents. Central and eastern neighborhoods are both denser and more racially and ethnically diverse.

Exhibit 27. Race dot density map, City of Burien, 2020



Data sources:

- U.S. Census 2020 Redistricting Data (PL 94-171) for population by race
- ACS Table B03002 (Hispanic or Latino origin by Race) or B02001 (Race)

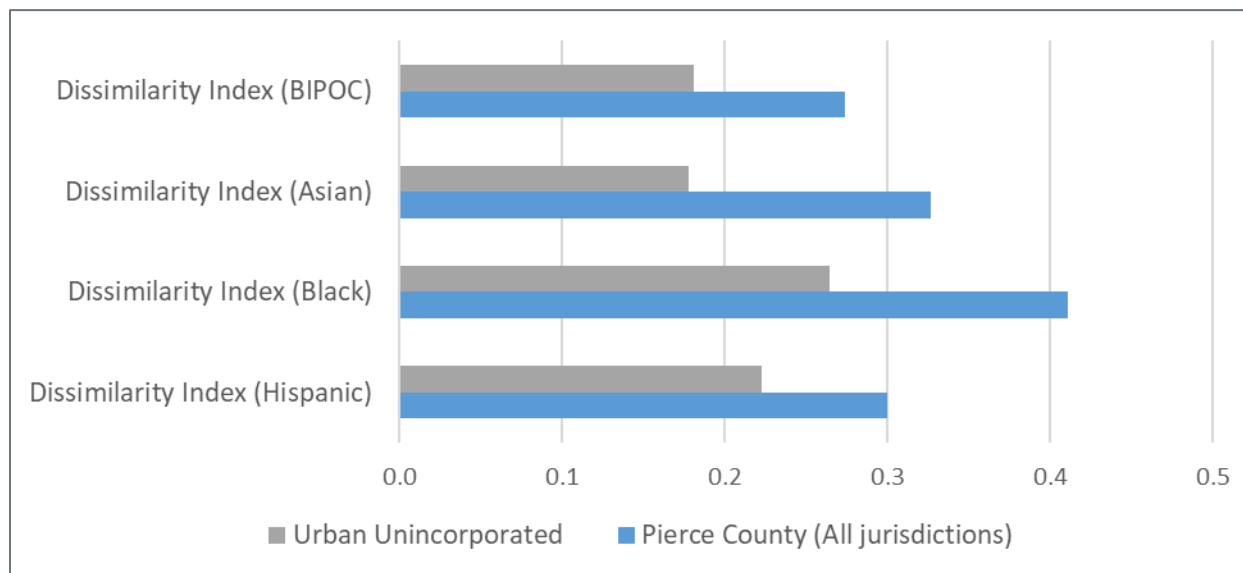
Dissimilarity index

A statistical method for measuring segregation is the dissimilarity index. Conceptually, a dissimilarity index measures the percentage of a group's population that would have to change residences for each

neighborhood to have the same percentage of that group as the metropolitan area overall (Census, 2021). The dissimilarity index is a measure of the degree to which the demographic composition of a smaller geographic unit (such as a neighborhood) reflects the overall demographic composition (such as a city). The index ranges from zero (perfectly integrated) to one (completely segregated). An index value of one would mean that each subarea is comprised entirely of persons from a single racial group. A dissimilarity index approaching zero indicates that the demographic composition of the subareas (such as census tracts) reflects the composition of the whole area (such as the jurisdiction). A higher dissimilarity index score suggests the effect of segregation (over representation of a subgroup) or exclusion (under representation of a subgroup).

Dissimilarity indexes are calculated for two groups at a time. For example, a dissimilarity index between the Black and White, non-Hispanic population can indicate the degree of black-white segregation in the community. Exhibit 28 presents dissimilarity index calculations for racial subgroups for Pierce County and urban unincorporated Pierce County in 2020; the index for each group is calculated relative to the White, non-Hispanic population. The analysis suggests that people who identify as Black are most segregated from the White, non-Hispanic population in all of Pierce County and the urban unincorporated areas of Pierce County. The consistent pattern of higher index values for all of Pierce County compared to the urban unincorporated areas suggests that BIPOC populations experience less segregation in the urban unincorporated areas compared to the county as whole.

Exhibit 28. Dissimilarity index calculations, Pierce County and urban unincorporated Pierce County, 2020



Source: U.S. 2020 Decennial Census – Redistricting Data (PL 94-171 Tables P1 and P2); BERK, 2022

Data sources:

In the Pierce County example above, the dissimilarity index was calculated using data from the 2020 U.S. Census (Redistricting Data PL 94-171, Tables P1 and P2) at the Census Tract level. The countywide dissimilarity index for each racial subgroup was calculated as follows:

- For each tract, calculate the ratio of the population of each racial subgroup to that group's countywide population.
- Subtract this computed ratio for the subject subgroup from the ratio for the comparison group (White, non-Hispanic).

- Calculate the countywide dissimilarity index for each racial subgroup by summing the results across all Census Tracts and divide by 2.¹⁰⁸

Location quotient

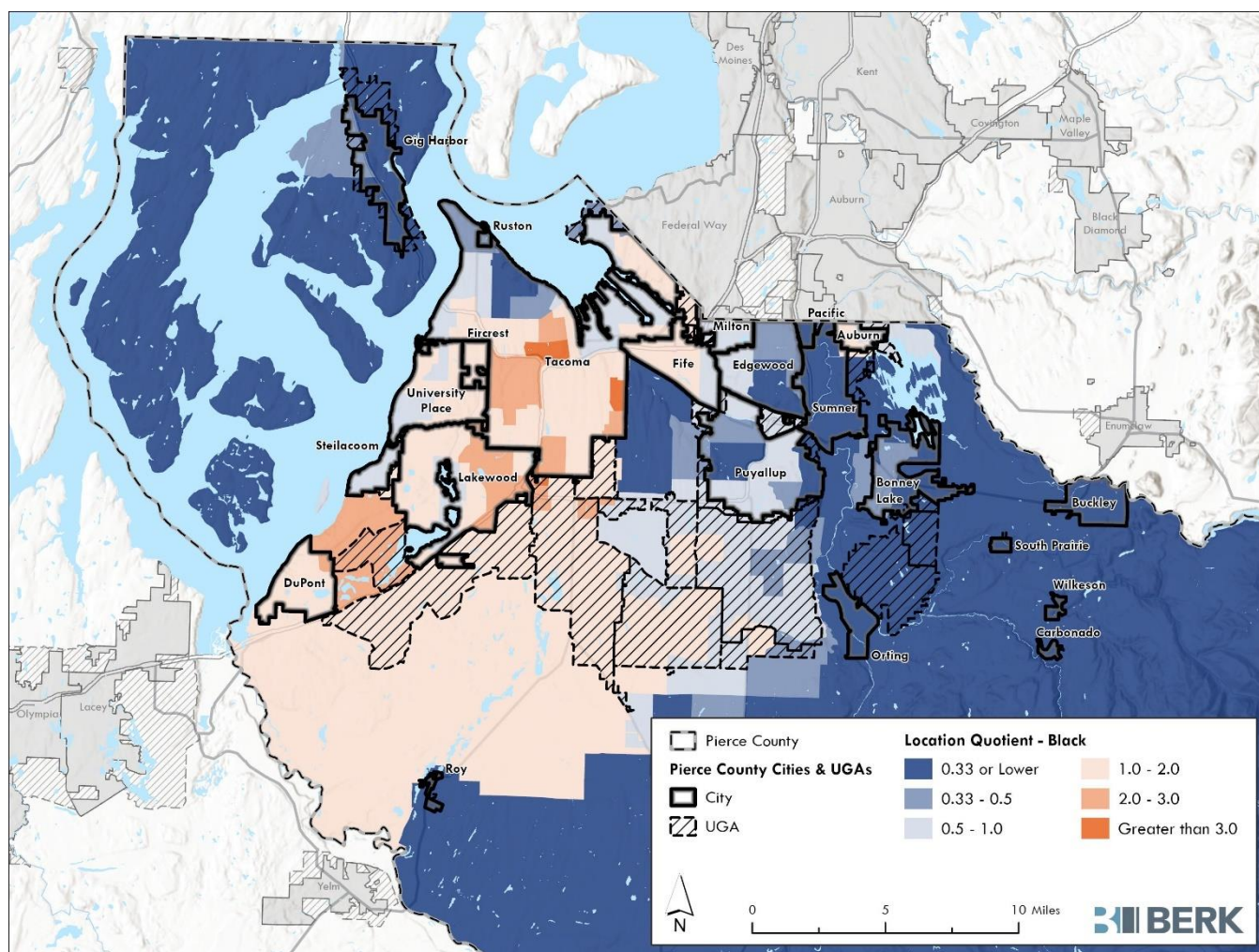
Another way to assess segregation is by using a location quotient. The location quotient is a measure of how concentrated a particular demographic group is within an area. The metric requires two geographic units – a smaller tabulation area, often a census tract, and the reference geographic unit, often the city or county. Calculating the location quotient of a specific demographic group can show the relative concentration of that group in each census tract relative to the city or county as a whole. For example, if 7% of the county population is Black, and 7% of the census tract is Black, then the location quotient is 1 indicating that the Black population is neither under- or over-represented in the census tract. Tracts with location quotients higher than 1 have a greater share of that population compared to the rest of the county, suggesting the effect of segregation.¹⁰⁹ For example, a tract where 14% of residents are Black would have a location quotient of 2. Conversely, a track where only 3.5% of residents are Black would have a location quotient of 0.5, suggesting under-representation or an exclusionary effect.

Exhibit 29 provides an example of a location quotient map for Black residents in Pierce County. It shows a few areas in orange where Black residents are significantly overrepresented compared to the county as a whole: the Hilltop neighborhood and a section of southeast Tacoma. Conversely, Black residents are significantly underrepresented in blue census tracts, including north Tacoma, Gig Harbor, Sumner, Edgewood, Puyallup, Bonney Lake and Orting, as well as smaller communities and unincorporated areas further from the urban core.

¹⁰⁸ A detailed description of the Index of Dissimilarity and the mathematical formula for calculating it is available here (page 1): <https://www.dartmouth.edu/~segregation/IndicesofSegregation.pdf>.

¹⁰⁹ Segregation and exclusion are terms that can be easily confused. Neighborhood or city exclusion is the process or effect of a group of people being prevented from accessing the area. Segregation is the process or effect of a group being forced or limited to occupying specific areas. When a population is excluded from areas in a city, it can experience segregation whereby they are compelled to live in close proximity to other members of the group. When that population suffers from stigma and other racialized disadvantages, segregation and exclusion can lead to community disinvestment, reduced opportunity and disproportionate hardship.

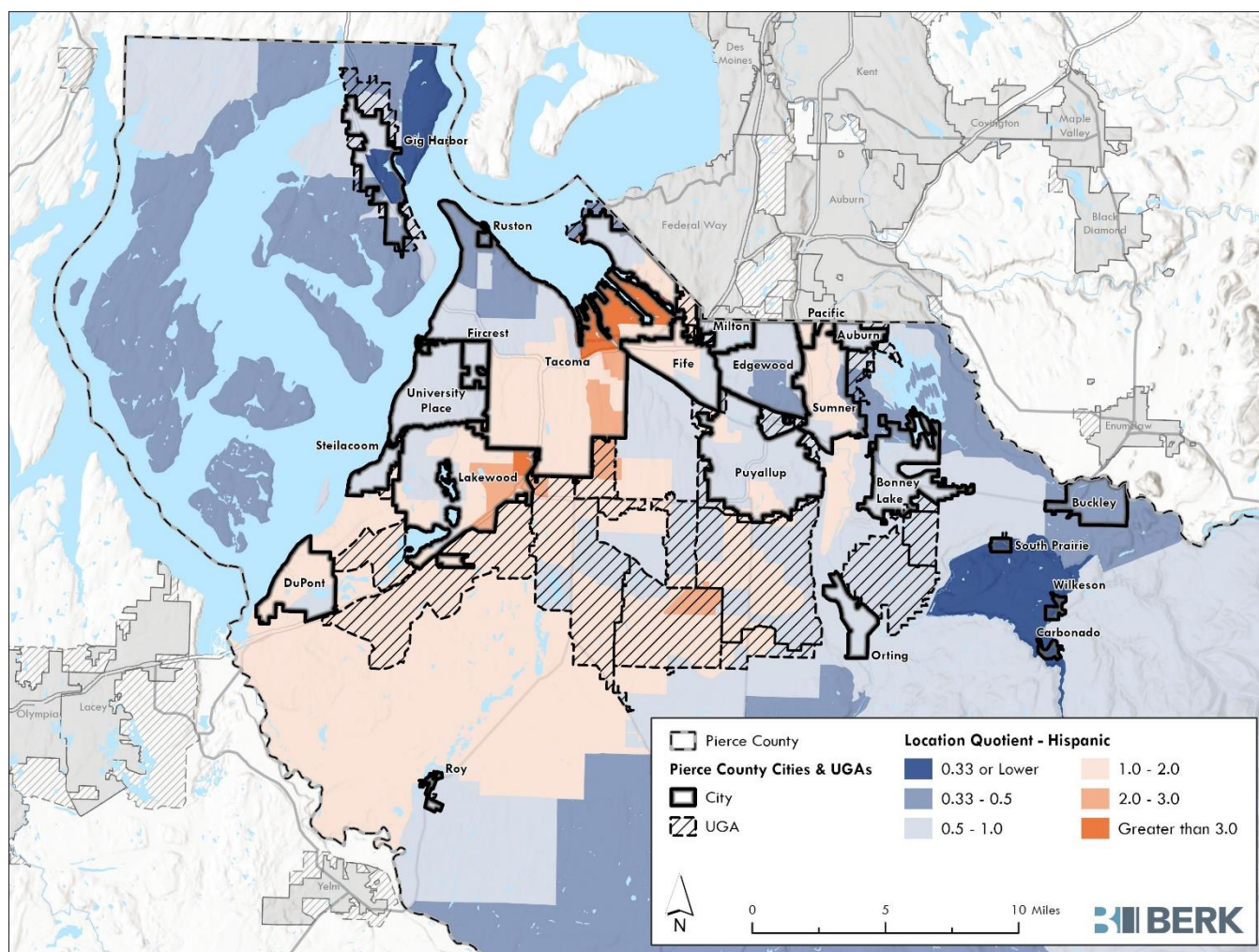
Exhibit 29. Location quotient for Black residents in Pierce County



Source: Census, 2020; BERK, 2022

Exhibit 30 shows location quotients for Hispanic or Latinx residents in the same area. Highest concentrations are in orange in eastern Lakewood, northeast Tacoma, southeast Tacoma and the unincorporated areas south of Puyallup. While there are a few pockets in dark blue where Hispanics or Latinx residents are significantly underrepresented, these cover a much smaller portion of the county than shown in the Black location quotient map.

Exhibit 30. Location quotient for Hispanic or Latinx residents in Pierce County



Source: Census, 2020; BERK, 2022

Data sources:

- U.S. Census 2020 Redistricting Data (PL 94-171), Tables P1 and P2

Comparison of workforce and residential population

Jobs to housing ratio

For many Washington communities, job growth has outpaced new housing construction leading to tight housing markets and rising housing costs. Regulations that constrain the market's ability to respond to housing demand contributes to the undersupply of housing resulting in displacement of lower-income households and exclusion of workers in the new jobs if they cannot compete with higher earning households for limited housing. The exclusion results in the low- to moderate-income workers absorbing the costs of longer commutes. The jobs to housing ratio—that is the number of jobs divided by the number of housing units—is a quick measure of the amount of housing supply relative to the jobs in the jurisdiction. A larger index means a low number of housing units relative to jobs, which is associated with longer commutes and greater housing cost burden for less educated or lower paid workers (Kober, 2021).

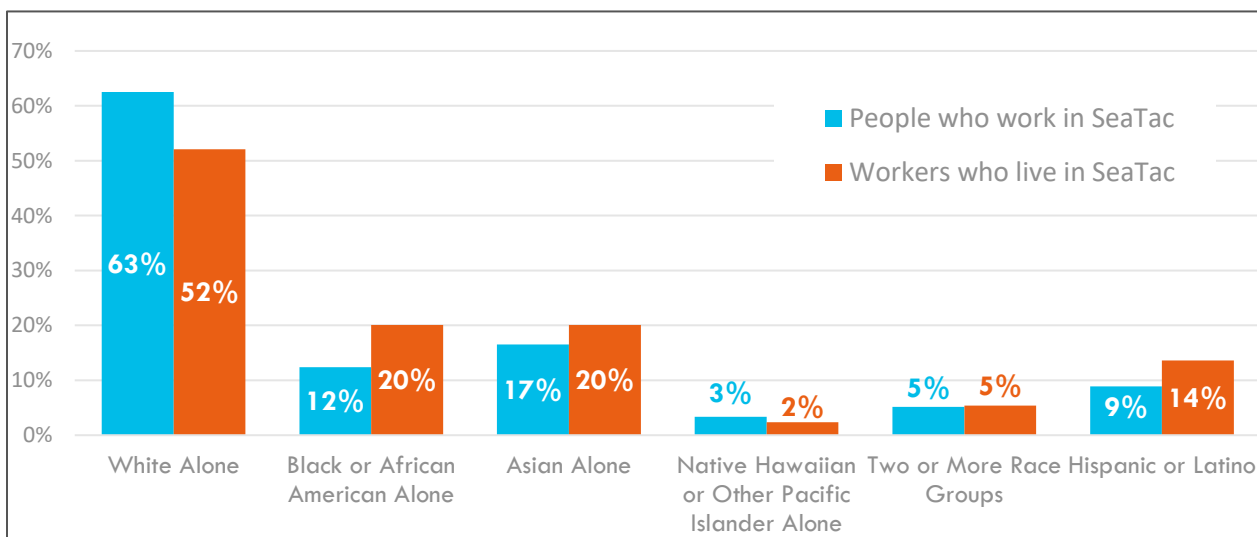
Comparison of workers and residents

People of all racial and ethnic backgrounds should have equitable access to the region's employment opportunities. However, BIPOC households have encountered many structural barriers to accessing housing in high demand areas due to such factors as racially restrictive covenants and regulations that prohibit housing suited to their needs. The result is that BIPOC households are functionally excluded from living in some areas.

One approach to assess whether there is evidence of exclusion is to compare the racial profile of the local workforce (the people who work in a jurisdiction) to the workers who live in a jurisdiction (the working residents). Taken together, people tend to make residential choices based on the location of their employment. If the residential profile of an area is largely white and the workforce is highly BIPOC, that suggests that people of color are living elsewhere and commuting into the jurisdiction for work. This situation indicates an exclusionary effect in housing.

Exhibit 31 presents an example analysis for the city of SeaTac. The U.S. Census OnTheMap Longitudinal Employer-Household Dynamics (LEHD) data includes only workers, so the comparison is between people who work in SeaTac (regardless of where they live) and the workers who live in SeaTac (regardless of where they work). This is a more accurate comparison than comparing the workforce to the residential population since many residents do not participate in the labor force, such as children and the retired. The data show that a greater proportion of the people who work in SeaTac are white than compared to the workers who live in SeaTac, 63% and 52% respectively. The data also show that workers who live in SeaTac are proportionally more Black, Asian and Hispanic than those who work in SeaTac. In short, BIPOC people are more represented in the workers that live in SeaTac than in people who work in SeaTac. This suggests a lack of residential exclusion of BIPOC households in SeaTac, or an exclusion of BIPOC workers from neighboring jurisdictions.

Exhibit 31. Racial composition of workers and residential workforce, City of SeaTac, 2019

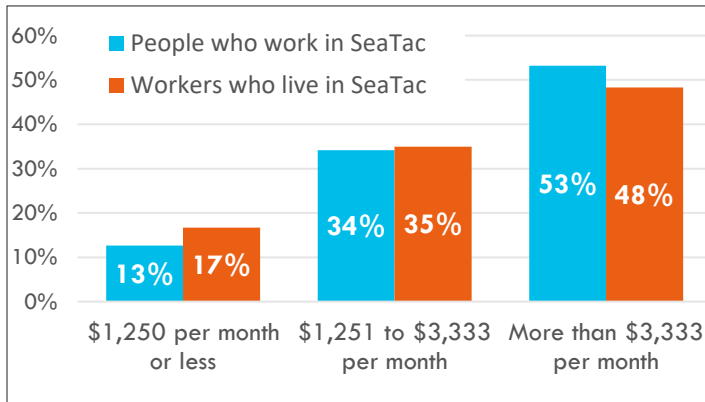


Source: U.S. Census Bureau, OnTheMap Application and LEHD Origin-Destination Employment Statistics, 2019

A community should have housing opportunities for all people who work within their jurisdiction, including largely residential suburbs. For example, if a community has the benefit of a local grocery store, the community should also have housing opportunities for grocery store workers. Using the same data as Exhibit 31, one can also assess for exclusionary effects in housing related to income. Exhibit 32 presents the

proportion of the residential workforce (workers that live in SeaTac) to the local workers (workers that work in SeaTac). Unfortunately, the income bins are standardized for all areas in the country and do not provide much detail on the distribution of earnings. However, SeaTac has a higher proportion (5 percentage points) of workers in the higher range of income than the workers who live in SeaTac. In this case, the higher end range is more than \$3,333 per month, or roughly annual earnings of \$40,000 or more. This data further suggests that for workers, there is housing opportunity among all the economic bins in SeaTac.

Exhibit 32. Wage groups of workers and residential workforce, City of SeaTac, 2019



Source: U.S. Census Bureau, OnTheMap Application and LEHD Origin-Destination Employment Statistics, 2019

Data sources:

- U.S. Census Bureau LEHD Origin-Destination Employment Statistics (OnTheMap)¹¹⁰

Concentration or dispersion of affordable housing or housing choice voucher usage

Publicly supported affordable housing supports access to safe, affordable housing for households within specific income limits. There are many forms of publicly supported housing, each with different program criteria and subsidy mechanisms. However, the geographic distribution of publicly available housing can have a segregation effect. Project-based subsidies in affordable housing buildings can effectively segregate households with low-incomes into a specific area. Additionally, voucher-based subsidies designed for households to use to rent private housing can segregate voucher-users into low-rent areas.

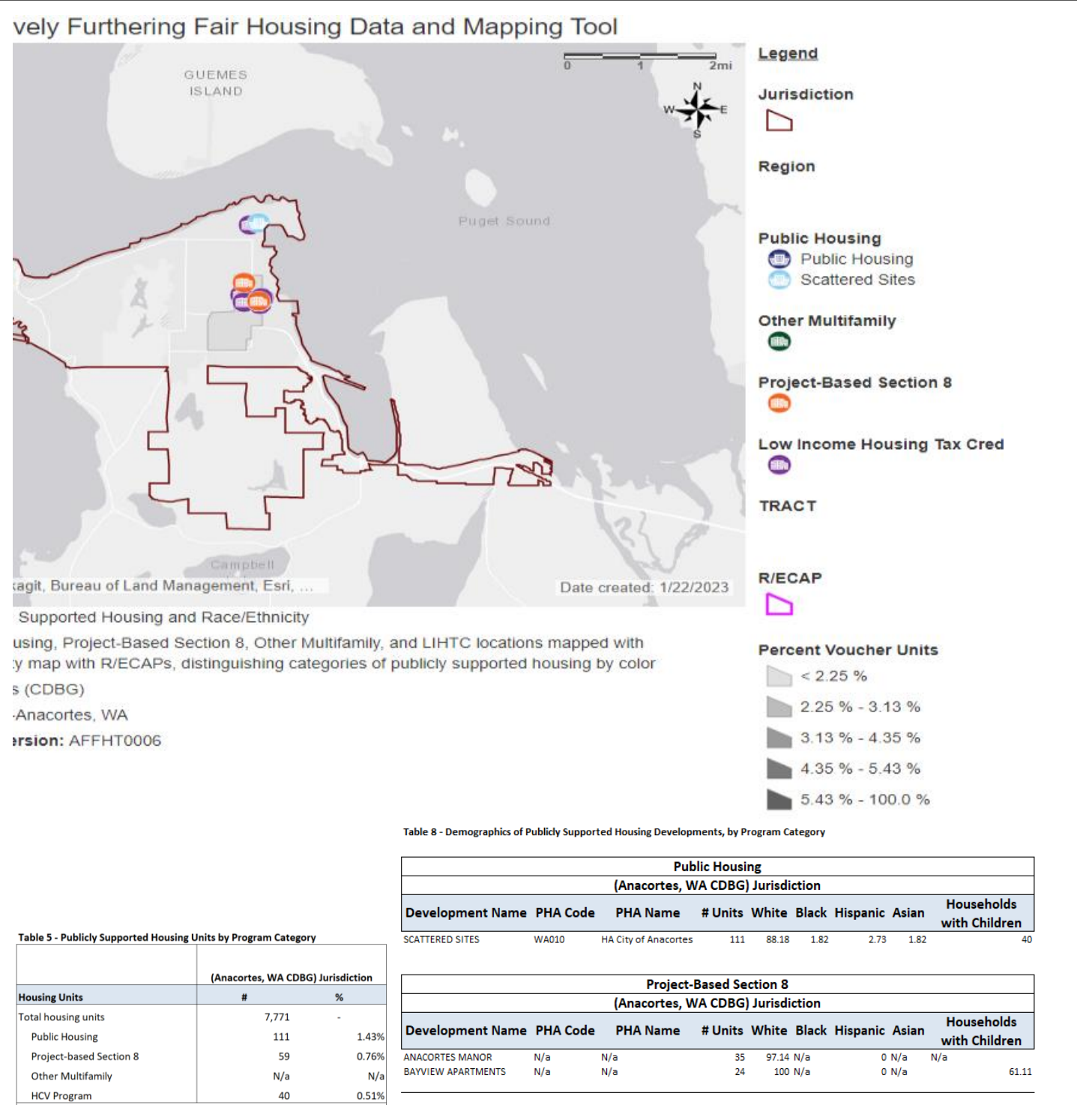
Data on publicly supported affordable housing is maintained by various administrative agencies. There are national datasets for federally supported housing, datasets for state supported housing, and your local jurisdiction may have locally supported or privately funded income-qualified housing. For federal and state supported housing, the Washington Center for Real Estate Research (WCRER) is completing an [inventory of the supply of subsidized rental housing](#) in Washington cities with populations greater than 10,000 as well as all counties in Washington. For locally supported affordable housing, check with your local housing authority or county to identify the best data source for your jurisdiction.

HUD's Affirmatively Furthering Fair Housing Tool ([AFFH Tool](#)) is helpful for assessing whether the geographic distribution of federally supported housing may be contributing to a segregation effect. Exhibit 33 presents the

¹¹⁰ <https://onthemap.ces.census.gov>

distribution of federally supported housing in the City of Anacortes (data from 2019). The map suggests that the publicly supported housing is concentrated in the center of town, along State Highway 2. The AFFH Tool enables users to download data on the number of units and information about the subsidy type and intended population. The tool also includes information on the distribution of housing choice voucher usage.

Exhibit 33. Publicly supported housing, City of Anacortes, 2019



Source: HUD AFFHT Tool (AFFHT0006), 2023

In addition to the mapping, the AFFH Tool also allows users to download the underlying data tables, included in Exhibit 33.

Data sources:

- [National Housing Preservation Database](#) (NHPD)¹¹¹ provides information on the federally assisted housing inventory (project-based subsidies). Access to the database is free but requires registration.
- [HUD's Affirmatively Furthering Fair Housing resources](#)¹¹² Map 5 maps information on publicly supported housing including public housing, project-based section 8, other multifamily and LIHTC locations.¹¹³ This map includes the option of a dot density layer reflecting the racial distribution in 2010 as well as a percent of housing units benefiting from a housing choice voucher.
- [PolicyMap's](#)^{114 115} provides similar functionality to the AFFH Tool under the Housing Locations menu. PolicyMap's web-based map includes data from HUD's [Multifamily Assistance and Section 8 Contracts, A Picture of Subsidized Households](#) report and the Real Estate Assessment Center (REAC) scores report.
- The Washington Center for Real Estate Research (WCRER) is completing [an inventory of the supply of subsidized rental housing](#)¹¹⁶ in cities with populations greater than 10,000, as well as all counties in Washington. The inventory seeks to list units in projects that receive subsidies, rather than units rented by households who receive demand-side subsidies such as housing vouchers.

Measures of displacement

Displacement is the process by which a household is forced to move from its community because of conditions beyond its control. Measures of displacement include both a change in households or housing units, as well as observations of mechanisms of displacement.

Foreclosures

Foreclosures affect homeowners who are no longer able to maintain mortgage payments or renters whose property owners face foreclosure. The lender must initiate a foreclosure process, which typically happens when the borrower has missed three payments and the fourth is due (typically called the 90-Day Delinquency Rate). A mortgage foreclosure should not be confused with a tax foreclosure, which typically requires the property owner to be in default on property taxes for more than three years. Under normal circumstances, the foreclosure rate in the United States is typically low, averaging less than 0.5 percent of all mortgages. The rate peaked in 2010 at 2.23% as part of the sub-prime lending crisis. In 2021, only 0.11% of all mortgages were in foreclosure.¹¹⁷

Data on mortgage foreclosures is available from the local recorder of deeds, typically at the county. Systematic data is only available by proprietary data sets.

¹¹¹ <https://preservationdatabase.org/>

¹¹² <https://egis.hud.gov/affht/>

¹¹³ At the time of publication, the AFFHT database is in version six (affht0006), which includes data on publicly supported housing from the Inventory Management System (IMS/PIH Information Center (PIC), 2019; Tenant Rental Assistance Certification System (TRACTS), 2019, and Low Income Housing Tax Credit (LIHTC) database, 2017. Data documentation is available at <https://www.hud.gov/sites/dfiles/FHEO/documents/AFFH-T-Data-Documentation-AFFHT0006-July-2020.pdf>.

¹¹⁴ <https://www.policymap.com/newmaps#/>

¹¹⁵ <https://www.policymap.com/newmaps%23/>

¹¹⁶ <https://wcrer.be.uw.edu/housing-market-data-toolkit/subsidized-rental-housing-profile/>

¹¹⁷ Data from Statista Research Department, 2022 available at <https://www.statista.com/statistics/798766/foreclosure-rate-usa/>.

Given the small numbers of foreclosures, it is difficult to draw conclusions about displacement risk of homeowners from foreclosure rates. However, foreclosures do indicate the presence of vulnerable homeowners. If a property owner hits financial distress and enters foreclosure, the tenants could be at risk of displacement when the building is sold. In foreclosures, the homeowner and household members are displaced, often at a time with limited financial resources.

Data sources:

- County recorders website or office
- [RealtyTrac](#)¹¹⁸ provides free access to property that are currently in foreclosure or have recently sold (past 6 months) from foreclosure.

Eviction

Eviction is the process by which a household is forced to leave their housing due to a failure to meet the conditions of the leasing contract, and is a direct form of displacement to the household. An eviction filing is a legal notice of an eviction suit filed by a property owner against a renter. People who have experienced eviction are at a greater risk of housing insecurity, vulnerability to exploitation and homelessness.

Due to unconscious and systemic bias, BIPOC households are more likely to experience eviction. Researchers at the University of Washington and University of California Berkeley have found that there is a disparate impact on households of color from evictions. For example, between 2013 and 2017, 7% of the Pierce County population identified as Black, however, one in six Black adults (18% of the adult population) were named in an eviction filing (The Evictions Study, 2022).

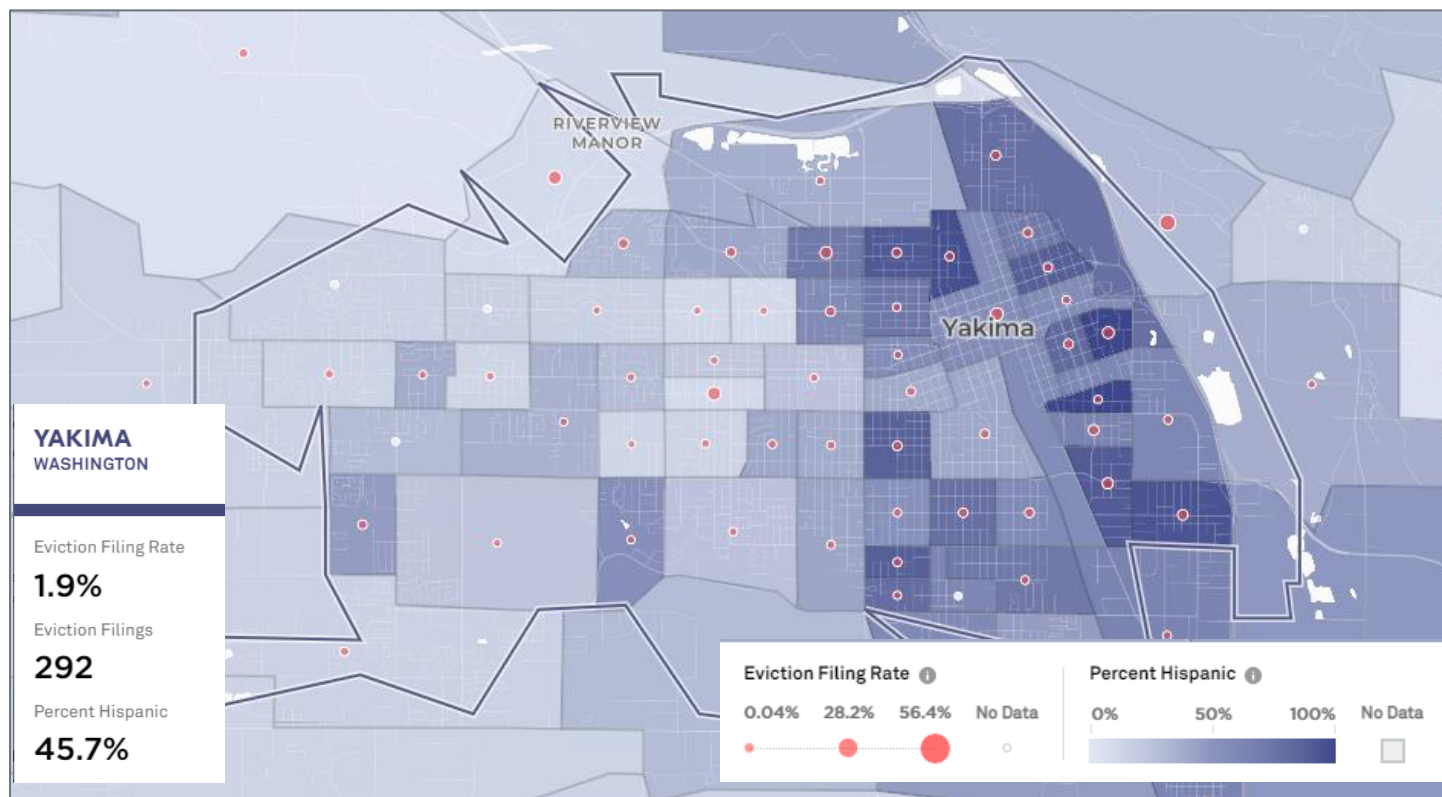
Eviction filings are public record and can be reviewed by potential property owners when conducting background checks on potential renters. Property owners can legally use a person's eviction history to reject a potential renter, creating a persistent barrier to accessing rental housing and increasing the cost of housing. Not all eviction filings result in an eviction: the renter may move out preemptively, pay overdue rent or reach some other settlement with the property owner. Though the filing may not result in an eviction from the current unit, it does impose a burden on the renter if they should seek housing elsewhere.

The [Eviction Lab](#) provides a national dataset on evictions, though the data has some lag. Formal eviction filings undercount informal eviction stemming from property owner harassment or when property owners remove amenities such as parking or utilities relied on by tenants that were originally available during leasing. Exhibit 34 presents the eviction filing rate for Yakima, overlaid with the percent of the census tract that identifies as Hispanic. The eviction filing rates are higher in Eastern Yakima, the area of the city that include higher proportions of people who identify as Hispanic. Community outreach to determine the relationship between eviction and displacement should include consultation with the Hispanic community.

Similar to the data on foreclosures, it is difficult to draw a conclusion about market change or neighborhood change that is a key component of displacement risk based on eviction filings. However, eviction information does provide a concrete local observation about vulnerable households that can complement an overall analysis of displacement risk. Reviewing patterns of eviction with local community members can help identify root causes, such as rising rents, rental property sales, job loss and other factors that cause tenants to default on their leases.

¹¹⁸ <https://www.realtytrac.com/>

Exhibit 34. Eviction filing rate for City of Yakima and percent of census tract that is Hispanic, 2018



Source: Eviction Lab, Princeton University, www.evictionlab.org. Data for Yakima downloaded on 8/9/2022

Data sources:

- [The Eviction Lab](https://evictionlab.org/)¹¹⁹ from Princeton University aggregates eviction data for all states and makes it available for use. The Eviction Lab includes a web-based mapping tool to display eviction filing rates by census block groups. Select “Original Data” to see data at resolutions less than county-level.
- [The Evictions Study](https://evictionresearch.net/washington/maps/summary.html)¹²⁰ provides information on eviction filings for each Washington County, by year and by race. Data at multiple geographic scales is available for King, Pierce, Snohomish and Whatcom Counties.

Loss of housing units

Over time, housing units may need to be demolished due to disrepair and functional obsolescence. Ideally, lost housing would be replaced by new housing in better condition. However, with this change in housing stock, households can be displaced if they are not able to afford the new housing, or the new housing is in a form or configuration that does not meet their needs. Community input is necessary to confirm whether a loss in housing units reflects economic displacement or environmental displacement (e.g., natural disasters).

By type of housing unit

Exhibit 35 presents analysis on the loss of housing units by type for the Walla Walla region as part of its regional housing action plan. The analysis demonstrates a net increase of 1,060 in housing units between

¹¹⁹ <https://evictionlab.org/>

¹²⁰ <https://evictionresearch.net/washington/maps/summary.html>

2010 and 2018. However, that net increase includes a loss of multifamily units in larger buildings (5+ units) and mobile homes. Further analysis of those losses can help identify populations that have been displaced due to a loss of housing options or who are at continued risk of displacement due to regulatory constraints or development patterns.

Exhibit 35. Net change in housing, Walla Walla region, 2010 – 2018

Housing Type	2010 Est. (2006-2010 ACS)	2018 Est. (2014-2018 ACS)	Change
Single Family Detached	11,235	12,394	1,159
Townhouses / Plexes	2,631	2,693	62
Multi-family (5+)	2,936	2,856	(80)
Mobile homes/other	1,230	1,149	(81)
Total	18,032	19,092	1,060

Note: Negative values are in parenthesis.

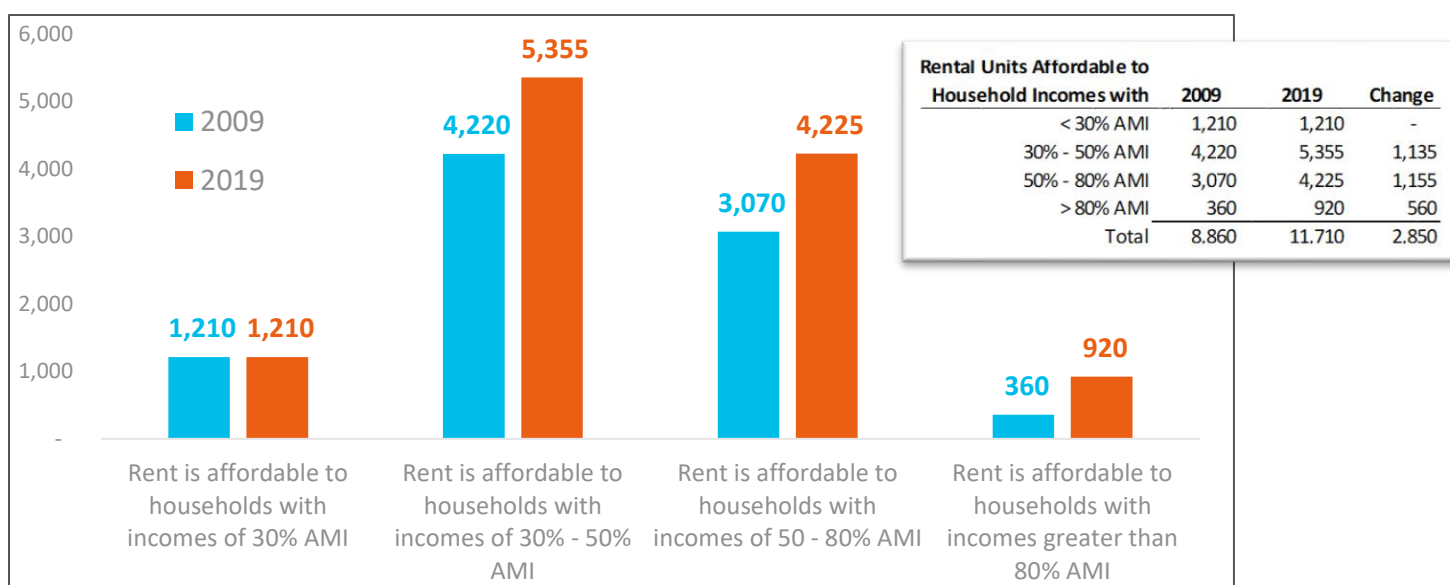
Source: US Census, American Community Survey 5-Year Estimates (Table B25024); Walla Walla Regional Housing Action Plan, FCS Group, 2021

By affordability level

Another approach to looking at housing loss is to look at the change in rental unit availability by affordability level. HUD's CHAS data provides estimates of housing units affordable to households with incomes ranges at various AMI ratios. Housing units are categorized according to self-reported rents, regardless of the income of the renter.

Exhibit 36 presents data from the City of Auburn on the change in rental housing units according to affordability level. The analysis demonstrates that units affordable to households earning less than 30% AMI is essentially unchanged over the 10-year period. There was growth in each of the other affordability categories, with the greatest change in rental housing units affordable to households earning 30-50% AMI (1,135 units) and 50-80% AMI (1,155 units). With population growth, it is unlikely the need for housing units affordable to households with incomes of less than 30% AMI stayed the same, which means that new households with extremely low incomes (<30% AMI) are lacking affordable housing. Under these conditions, a household that suffers a loss of income due to illness or other crisis is at greater risk of displacement due to insufficient housing options. Additional analysis of housing cost burden by affordability level can illuminate remaining gaps in housing supply relative to need.

Exhibit 36. Change in rental units* by affordability level, City of Auburn, 2009 - 2019



*Rental units with complete kitchen and plumbing facilities

Source: HUD CHAS (Comprehensive Housing Affordability Strategy) data based on 2005 – 2009 and 2015-2019 ACS 5-year average data (Table 15C); BERK, 2023

Data sources:

- U.S. Census ACS
- Office of Financial Management housing unit counts
- HUD CHAS data (Table 15)

Closure of manufactured home parks

Manufactured Home Parks (MHPs) offer a unique housing option that is often more affordable than other housing options. MHPs provides a unique housing option that combines some of the benefits of homeownership with lower cost points. Most manufactured homes and manufactured home parks provide quality housing at price points that are more affordable than site-built housing that is similarly located and sized. Manufactured homes are disproportionately occupied by older adults compared to other housing types and may have fixed incomes.

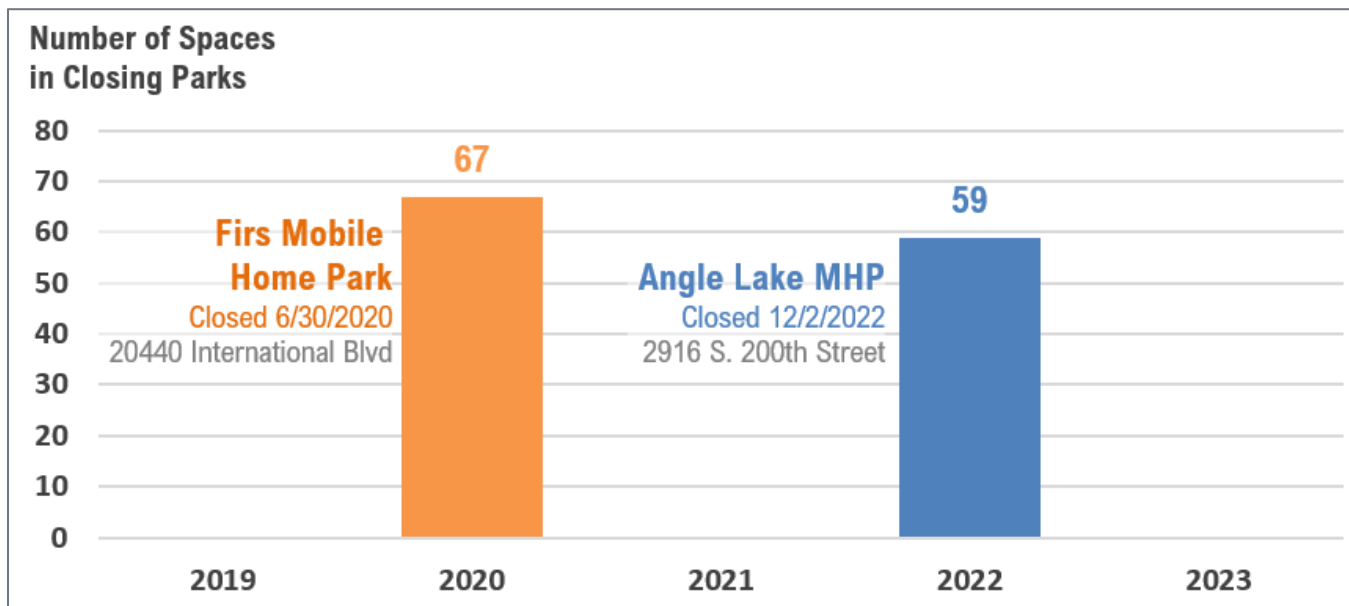
The primary benefit to the homeowner is that by owning the housing unit, the monthly costs are less expensive than similarly sized homes elsewhere. Many residents of MHPs value the configuration of small units that are not attached to one another, allow for private exterior spaces, enable residents to keep their vehicle (often their second most valuable asset) close to their home, the tight-knit community and lack of through traffic. Ownership of the unit also allows for more flexibility in décor and layout.

Once manufactured homes are sited, they are largely immobile. Residents in MHP communities often lack the option to easily move their manufactured home to another park. Moving a manufactured housing unit is costly and could potentially damage the unit. Since market rate housing and apartment rentals are often out of the price range for many MHPs homeowners, they are functionally a captive market and vulnerable to increased

fees by park management and displacement if the MHP is converted to other uses.¹²¹ Residents are frequently displaced out of the community when parks close.

Owners of MHPs are required to register the park with the Department of Commerce, which maintains a list of all registered parks.¹²² As of October 2022, there were 1,139 MHPs registered in Washington containing more than 57,000 home sites. Tenants in smaller MHPs, MHPs with older housing units, MHPs that are owned by individuals, and/or are located in non-residential zones may be at higher risk of displacement due to parks closing. State law requires that MHP owners provide twelve months' notice to the Department of Commerce when they plan to close the park. Commerce can then provide support to impacted tenants through the Manufactured/Mobile Home Relocation Assistance Program. Commerce tracks how many parks have closed and the number of impacted households.¹²³

Exhibit 37. Number of spaces in closed registered manufactured home parks, City of SeaTac, 2019 – 2023



Source: Department of Commerce, 2023

Data sources:

- Department of Commerce [Registered Manufactured/Mobile Home Communities in Washington \(Excel\)](#)¹²⁴
- Department of Commerce [Manufactured/Mobile Home Community Closure List \(PDF\)](#)¹²⁵

¹²¹ The Municipal Research Service Center provides an overview of the role of MHPs as a local source of affordable housing and strategy and policy options for preventing displacement or reducing the hardships created when MHPs close. See <https://mrsc.org/stay-informed/mrsc-insight/february-2022/manufactured-home-parks-as-affordable-housing>.

¹²² Information on MHPs in Washington is available on Commerce's Manufactured/Mobile Home Relocation Assistance Program at <https://www.commerce.wa.gov/building-infrastructure/housing/mobile-home-relocation-assistance/>.

¹²³ That data is available on Commerce's website: <https://app.box.com/s/d07sr6q93xj8ejrg5y0gmksw8oahxk0h>, which goes back to 2008.

¹²⁴ <https://deptofcommerce.box.com/shared/static/kngyqojutjrp8vhbwgp9q4sighmk9r5.xlsx>

¹²⁵ <https://app.box.com/s/d07sr6q93xj8ejrg5y0gmksw8oahxk0h>

Expiring affordable housing covenants

Depending on the subsidy mechanism, owners of affordable housing can convert their properties to market rate rentals when those covenants expire. Expiring affordable housing covenants can lead to the displacement of households who are no longer able to afford their rent.

Data sources:

- [National Housing Preservation Database](#) (NHPD)¹²⁶
- Public housing authorities

Eminent domain or condemnations

Washington state law grants governments the right to eminent domain. Eminent domain is the power of government to acquire private property necessary for public use. The action may only impact a portion of the property and may or may not impact the existing housing. When a renter-occupied unit is subject to eminent domain, its tenants are forced to relocate and are at risk of being forced out of the neighborhood if they are unable to find suitable housing. Condemnations can be tracked through city records at the housing unit level.

Data sources:

- Record of jurisdictional action

Housing units lost to natural disaster

Natural disasters such as wildfires, flooding, earthquakes and high winds can lead to loss of housing structures. When a housing unit is damaged and rendered no longer safe or viable to live in, tenants are displaced and must relocate to a new residence.

Data sources:

- Housing units lost to natural disasters can be noted in local incident reports
- [Federal Emergency Management Agency \(FEMA\)](#)¹²⁷ tracks information on number of applicants, number of damaged properties, dollar amount of damage and other variables due to emergencies and natural disasters

Condominium conversion applications

Condominium conversion of existing apartment housing is regulated by Washington state law, which provides procedural protections for rental tenants. If the rental tenants do not wish to purchase their units, they may be eligible for relocation assistance.

Data sources:

- Condominium conversions must be reported to the Washington State Housing Finance Committee ([RCW 64.34.470](#)). Local regulations may also require filing notice with the city.

¹²⁶<https://preservationdatabase.org/>

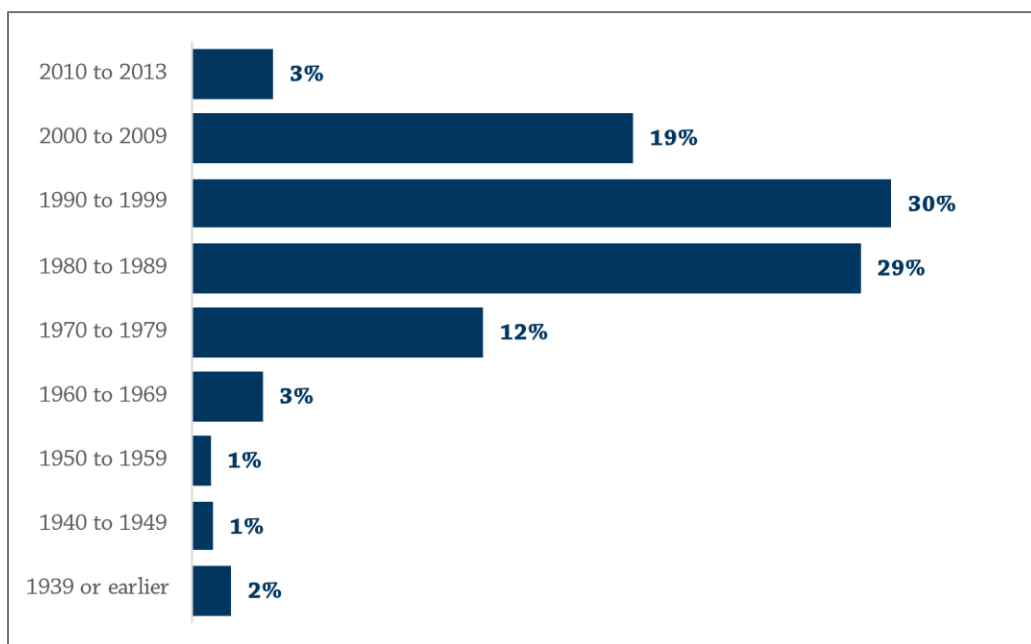
¹²⁷<https://www.fema.gov/openfema-data-page/housing-assistance-program-data-owners-v2>

Deterioration in housing quality

Communities concerned about poor conditions in the existing housing stock may look at a number of indicators provided by the ACS including age of housing stock, housing lacking complete plumbing facilities and housing lacking complete kitchen facilities. Cities with rental inspection programs may be able to use their information to assess conditions as well. This information can be used to request funding for programs that provide housing assistance or rehabilitation loans.

Exhibit 38 presents the percentage of housing units by year built for the City of Cle Elum using ACS 5-Year data. The analysis demonstrates that the vast majority of housing (59%) is between 20 and 30 years old, with relatively little more than 50 years old. Older housing stock is not necessarily correlated with poor condition, but aged housing that has not been well maintained or remodeled over time may signal needed upgrades and investment.

Exhibit 38. Housing stock by year structure built, City of Cle Elum, 2016



Source: American Community Survey 2014 – 2018 (Table B25034); BERK, 2016

Data sources:

- Local assessor data on the year the residential structures were built
- ACS data Table B25034

Examples of displacement risk analysis

A displacement risk assessment is a set of analysis and community engagement used to determine if a specific population in a specific area is currently being, or is under elevated risk of being, forced out of the area based on factors outside of their control. The analysis is conducted at a scale less than the geographic extent of the jurisdiction. Typically, data availability requires the analysis to use a neighborhood scale or census tract. However, analysts and planning practitioners report that the experience of displacement risk can vary in a matter of blocks, particularly when there are geographic features not well reflected in the data such as major roads or topographic boundaries. While an analysis at the census tract level can provide a general idea of where gentrification is happening or where displacement risk is relatively higher, community input and on-the-

ground perspectives will be necessary to define the specific areas or populations experiencing displacement pressure and the root causes.

A displacement risk assessment¹²⁸ typically includes a combination of measures that can be categorized into groups:

- **Sociodemographic measures** include variables that are associated with a higher risk of displacement such as households that rent their housing, have household incomes lower than other households in the area, are BIPOC, speak a language other than English or have lower educational attainment than adjacent areas. These factors are associated with greater housing vulnerability and structural barriers that decrease their ability to find and access replacement housing in the neighborhood should they be forced from their current housing.
- **Sociodemographic change measures** assess whether the pattern of change in the demographic profile of a neighborhood is diverging from the pattern of change in the jurisdiction. For example, if the demographic profile of a city is increasingly BIPOC, but the demographic profile of a neighborhood is increasingly white, BIPOC households may be experiencing displacement from that area.
- **Market change measures** include variables of housing cost and housing cost change in the area, typically compared to a larger market reference of the jurisdiction or the region. These may include some observations of whether the area was previously a low or high-cost area. Rising costs in previously low-cost areas suggest a higher displacement risk than rising costs in previously high-cost areas.
- **Proximity or presence of amenity measures** often include access to transit, low-crime areas, educational resources, parks, schools and natural amenities. Change in the presence of amenities, particularly transit services, are regarded as predictive of increased displacement pressure.

The displacement risk analysis should be designed based on diverse and inclusive community input on the local experience of housing pressures, risks and barriers felt in the community. To get started, there are some useful displacement risk models relevant to Washington communities discussed below that may be used as an example for developing a local displacement risk analysis. However, with these examples there are challenges and limits related to data availability requiring large areas of analysis and data latency limiting the ability to identify rapidly changing conditions. Community input and self-reported data can help refine these approaches to create a more nuanced assessment of local conditions and provide greater direction for policy solutions tailored to local needs.

Example 1: The Puget Sound Regional Council's [Displacement Risk Mapping](#)

PSRC's displacement risk mapping identifies high-risk communities in the Central Puget Sound region.¹²⁹ The mapping tool identifies areas where residents and businesses are at greater risk of displacement. PSRC's technical guide to evaluating displacement risk provides information on the data inputs and indexing process.¹³⁰

¹²⁸ The National Neighborhood Indicators Partnership provides an overview of common approaches to measuring neighborhood change to understand and prevent displacement. See https://www.urban.org/sites/default/files/publication/100135/guide_to_measuring_neighborhood_change_to_understand_and_prevent_displacement.pdf (Cohen & Pettit, 2019).

¹²⁹ The displacement risk mapping tool and interactive report is available at <https://www.psrc.org/our-work/displacement-risk-mapping>. This map covers King, Kitsap, Pierce and Snohomish Counties.

¹³⁰ See <https://www.psrc.org/media/2749>.

Example 2: The City of Portland's Gentrification and Displacement Study

Lisa K. Bates (Bates, 2013) developed commonly used approach designed to assess an areas phase along a gentrification scale, summarized in Exhibit 39.¹³¹ The approach's strength lies in the identification of the phase of gentrification, since opportunity and mitigating strategies to prevent displacement in the early phases of gentrification are different from the later phases of gentrification. The City of Shoreline implemented this approach using analysis at the block group level as part of its Housing Action Plan in 2020, presented in Exhibit 40.

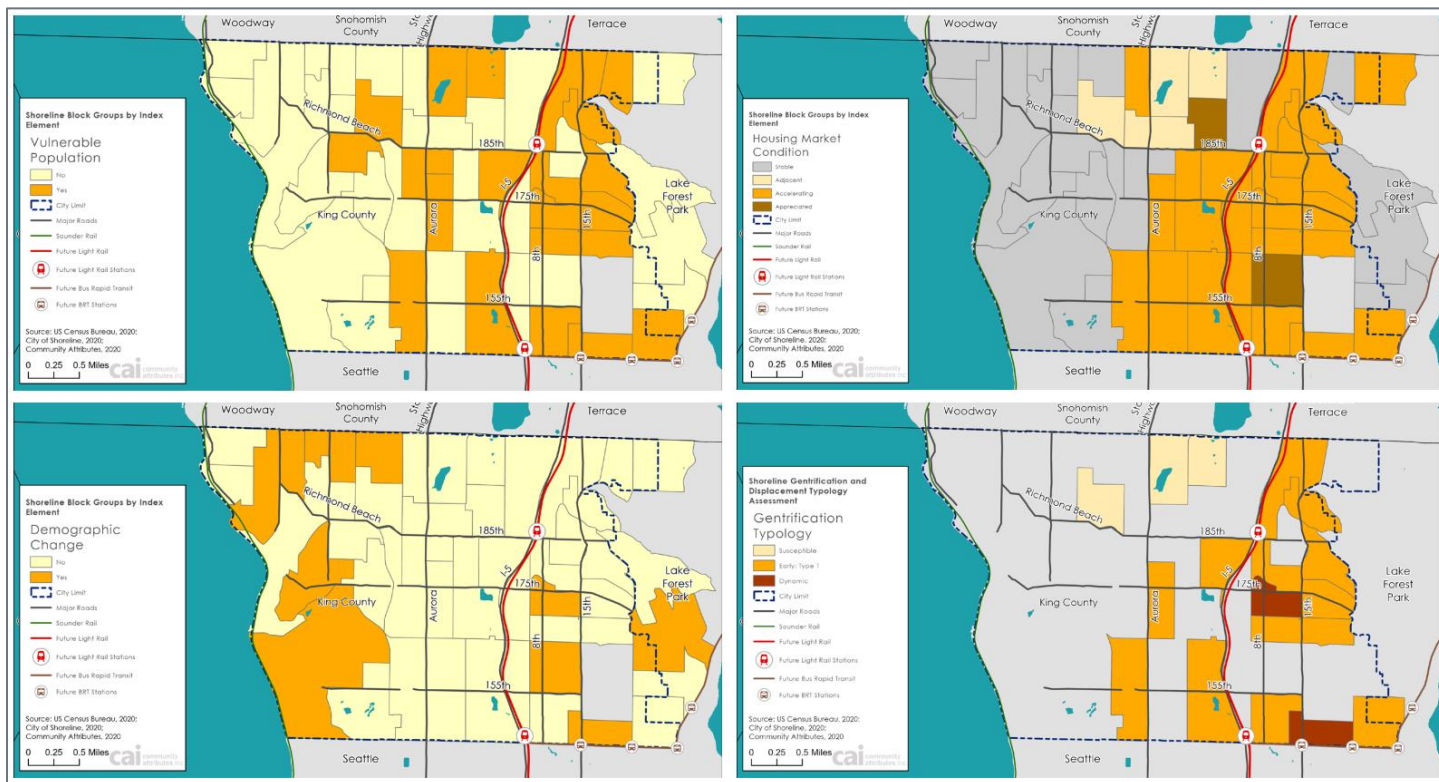
Exhibit 39. Neighborhood states of gentrification typology, City of Portland, 2013

Typology	Vulnerable population?	Demographic change?	Housing market condition
Susceptible	Yes	No	Adjacent
Early Type 1	Yes	No	Accelerating
Early Type 2	Yes	Yes	Adjacent
Dynamic	Yes	Yes	Accelerating
Late Type 1	Yes	Yes	Appreciated
Late Type 2	Previously vulnerable (2000 or in 2006-10)	Yes	Accelerating
Continued Loss	Previously vulnerable (2000 or in 2006-10)	Increasing share of white people and adults with a bachelor's degree	Appreciated

Source: (Bates, 2013)

¹³¹ <https://www.portland.gov/sites/default/files/2020-01/2-gentrification-and-displacement-study-05.18.13.pdf>

Exhibit 40. Gentrification and displacement risk, City of Shoreline Housing Toolkit, 2020



	Number of Block Groups	Population	Households	Household Income Below 80% AMI	Cost Burdened Renter Households
Susceptible	3	4,815	2,370	2,917	1,153
Early: Type 1	13	15,787	6,183	4,428	1,474
Early: Type 2	0	0	0	0	0
Dynamic	2	2,309	814	786	280
Late: Type 1	0	0	0	0	0
Late: Type 2	0	0	0	0	0
Continued Loss	0	0	0	0	0
Total	18	22,911	9,367	8,131	2,907

Source: City of Shoreline Housing Toolkit Workshop, Shoreline Planning Commission, November 5, 2020; 132 Community Attributes, 2020

Example 3: The Walla Walla Regional Housing Action Plan

The Walla Walla Regional Action Plan used a similar approach based on a simplified approach to the City of Portland's model.¹³² The analysis of displacement risk is conducted at the city, census tract and census block group scale using six variables:

- Percent of the population who identify with a community of color
- Percent of adults (25 or older) without a four-year degree
- Percent of households that are renters
- Percent of population that are low income

¹³² Packet available at: <https://www.shorelinewa.gov/home/showpublisheddocument/50115/637395782918030000>

¹³³ The displacement risk analysis and minimization strategy can be found in Appendix E of the Walla Walla Regional Housing Action Plan (May 7, 2021): <https://www.wallawallapubliclibrary.org/home/showpublisheddocument/5631/637576228305162398>

- Median home value
- Median gross rent

Areas that had higher estimates than the regional average in 5 or 6 of the variables are identified as areas vulnerable to displacement.

Off-the-shelf analysis tools

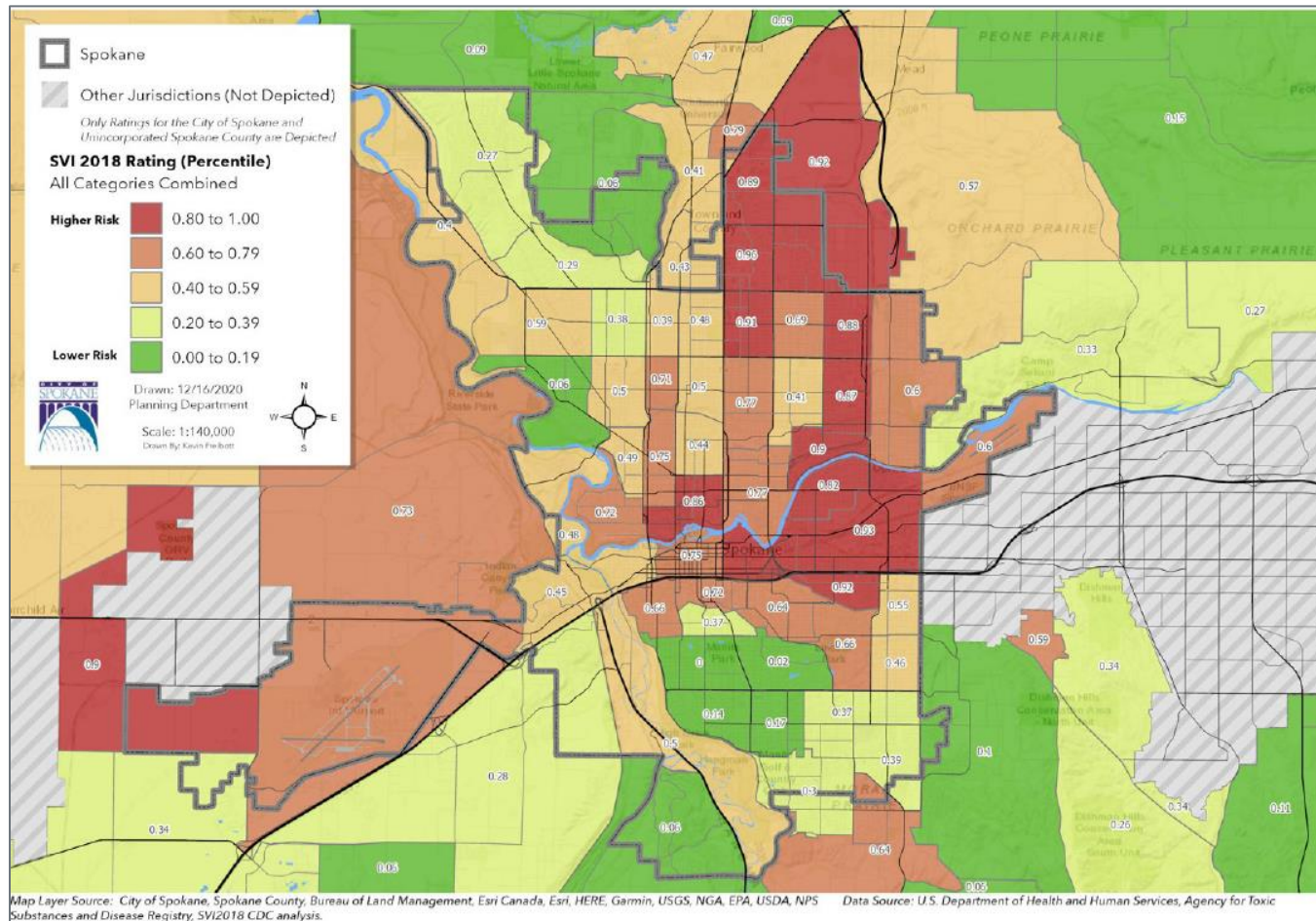
One of the primary components of assessing displacement risk is understanding the social vulnerability of a specific community based on social and demographic factors. Typically, an analysis includes consideration of more than one variable. There are some options of off-the-shelf indices designed to assess and compare social vulnerability across an area.

- **The Center for Disease Control's (CDC) Social Vulnerability Index (SVI).** The CDC SVI provides vulnerability index values for all census tracts in the United States. The service includes an interactive map and ability to download the SVI scores across four dimensions of vulnerability: socioeconomic, household composition and disability, minority status and language, and housing type and transportation.¹³⁴

Exhibit 41 shows the City of Spokane displacement risk analysis using SVI data.

¹³⁴ [Technical documentation](https://www.atsdr.cdc.gov/placeandhealth/svi/documentation/pdf/SVI2018Documentation_01192022_1.pdf) is available at the CDC's [Place and Health website](https://www.atsdr.cdc.gov/placeandhealth/svi/documentation/pdf/SVI2018Documentation_01192022_1.pdf). See https://www.atsdr.cdc.gov/placeandhealth/svi/documentation/pdf/SVI2018Documentation_01192022_1.pdf.

Exhibit 41. City of Spokane displacement risk map (2018) from the Spokane Housing Action Plan



Source: City of Spokane Housing Action Plan, 2020

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Appendix D. Policy Options

Policy options by category

Category	Policy options
Increase affordable housing production	<p>Generate revenue for affordable housing</p> <ul style="list-style-type: none"> • Affordable housing property tax levy • Housing and related services sales and use tax • Housing Trust Fund • First quarter percent real estate excise tax (REET 1) • Second quarter percent real estate excise tax (REET 2) • HB 1406 affordable housing sales tax credit • Lodging tax • Community Development Block Grants (CDBG) • HOME investment partnerships program • Low-Income Housing Tax Credit (LIHTC) • Community Revitalization Financing (CRF) • Linkage fees for affordable housing <p>Increase affordable housing production</p> <ul style="list-style-type: none"> • Affordable housing incentive programs • Density bonuses • Rezoning • Affordable housing overlay (AHO) zones • Zoning reforms • Inclusionary zoning (IZ) • Strategic infrastructure investments • Local programs to help build missing middle housing • Transfer vacant/underutilized land and buildings • Multi-Family Tax Exemption (MFTE) • Impact fee waivers • Accessory dwelling units (ADUs)/Detached ADUs (DADUs) • Zoning supporting smaller housing typologies such as micro-apartments and tiny homes • Waive, reduce or defer fees and charges for low-income housing projects to incentivize affordable housing
Preserve existing affordable housing	<ul style="list-style-type: none"> • Mobile home park preservation • Mobile home park conversion to cooperative • Support third-party purchases of existing affordable housing • Support Community Land Trusts (CLTs) • Retain affordability over time • Notice of intent to sell ordinance • Regulating short-term rentals

Category	Policy options
Protect existing communities and households	<p>Homeownership programs</p> <ul style="list-style-type: none"> • Support programs that provide financial assistance to low-income homeowners through down payment assistance • Support homeownership and foreclosure education and counseling programs • Support programs that offer home repair and rehabilitation assistance • Support home mortgage loan programs • Fee waivers for water or sewer connection <p>Rental assistance</p> <p>Tenant protections</p> <ul style="list-style-type: none"> • Right to return policy • Rental inspection and registry program • Support for tenant education and property owner incentive programs • Deferral of property tax • Tax deferral for retired persons • Tax deferral for specific individuals • Tenant Right to Counsel • Sewage and solid waste fee assistance programs • Relocation assistance • Tenant Opportunity to Purchase • Regulate short-term rentals
Ensure the benefits of investment and development are equitably distributed	<ul style="list-style-type: none"> • Community benefits agreements • Support community-led investments • Monitor for equitable outcomes

Increase affordable housing production

Generate revenue for affordable housing

The options listed below are drawn from [MRSC's overview of funding sources available to cities and counties in Washington](#)¹³⁵ and the "Appendix 4: Resources for Funding Affordable Housing in Washington State" in [Guidance for Developing a Housing Action Plan](#), published by the Washington State Department of Commerce.¹³⁶ Please see these resources for more detailed information and a comprehensive list of sources.

Affordable housing property tax levy. Up to \$0.50 per \$1,000 of assessed value can be levied toward an affordable housing fund for projects serving very low-income households (<50% of area median income (AMI)) if approved by a majority of voters in a taxing district ([RCW 84.52.105](#)). Funds can be used for a variety of purposes such as:

¹³⁵ <https://mrsc.org/Home/Explore-Topics/Planning/Housing/Affordable-Housing-Funding-Sources.aspx>

¹³⁶ <https://deptofcommerce.box.com/shared/static/pophc16jetggsctctmnbjomm0qa7tpu8.pdf>

- Matching funds for nonprofit housing developments, which increases competitiveness for additional financing from state or national sources.
- Affordable homeownership, owner-occupied home repair and foreclosure prevention programs for households up to 80% of AMI.

Housing and related services sales and use tax. Counties can pass a sales and use tax of up to 0.1% to fund affordable housing programs serving households with incomes below 60% of the AMI. Any city or town may impose the same sales tax if the county has not done so first. Funds must serve those households with incomes below 60% of the AMI that fall into one of the following categories: individuals with mental illness, veterans, senior citizens, homeless families with children, unaccompanied homeless youth, persons with disabilities or domestic violence survivors ([RCW 82.14.530](#)).

Housing Trust Fund. Housing trust funds are distinct funds established by local governments that receive an ongoing source of dedicated funding to support housing affordability. They can be designed to meet the most critical housing needs in each community. Housing trust funds can leverage additional funding from state or national programs (e.g., Community Development Block Grants) to maximize the benefit of dollars raised. The Washington State Housing Trust Fund, administered by the state's Department of Commerce, awards nonprofit housing developers, local and county housing authorities, indigenous tribes and local governments funding for projects that build and preserve housing for people making 80 percent AMI and below.

First quarter percent real estate excise tax (REET 1). Any city or town may levy a 0.25% real estate excise tax primarily for capital projects and limited maintenance ([RCW 82.46.010](#)). Revenues are restricted and may only be used for certain capital purposes and housing relocation assistance, depending on the city's population and whether it fully plans under GMA. REET 1 does not require voter approval.

Second quarter percent real estate excise tax (REET 2). Any city or town that is fully planning under the GMA may impose an additional 0.25% real estate excise tax. Revenues can only be used to finance capital projects in the capital facilities plan of the comprehensive plan, which until January 1, 2026, may include up to \$100,000 or 25% (up to \$1 million) of available REET 2 funds to rehabilitate, repair and/or purchase affordable housing ([RCW 82.46.035](#)). REET 2 does not require voter approval for cities required to plan under GMA, but does require voter approval for cities voluntarily planning under GMA.

HB 1406 affordable housing sales tax credit. From July 2019 to July 2020, cities and counties had the option to participate in the HB 1406 affordable housing sales tax revenue sharing program ([RCW 82.14.540](#)). Any jurisdiction that followed the required procedures before the July 2020 deadline will receive a share of the State's portion of the sales tax for 20 years.

Lodging tax. Cities and counties may also use lodging tax revenues to repay general obligation bonds ([RCW 67.28.150](#)) or revenue bonds ([RCW 67.28.160](#)) issued to finance loans or grants to nonprofit organizations or public housing authorities for affordable workforce housing within a half-mile of a transit station.

Community Development Block Grants. The federal Community Development Block Grant (CDBG) program provides annual grants to local governments and states for a wide range of community needs, including housing rehabilitation, homeownership assistance, local connections to sewers and affordable housing plans. These funds cannot fund new housing construction but can fund infrastructure in support of new affordable housing. Eligible rural cities and counties serving low- and moderate-income households in CDBG non-

entitlement communities¹³⁷ can find more information at Washington State Department of [Commerce's CDBG website](#). For urban CDBG entitlement programs, contact the local CDBG program manager.

HOME Investment Partnerships Program. The HOME Investment Partnerships Program (HOME) is a U.S. Department of Housing and Urban Development (HUD) block grant program similar to Community Development Block Grants, except that the funds are for the sole use of preserving and creating affordable housing. The funds can be used for a variety of activities related to affordable rental housing and affordable homeownership. The income requirements vary depending on the nature of the funded activity, but typically target very low-income households (less than 50% AMI). Some HOME funds are awarded through the state Housing Trust Fund process.

Low-Income Housing Tax Credit. The Low-Income Housing Tax Credit (LIHTC) is a federal tax credit program created in 1986 to provide private owners an incentive to construct and maintain affordable rental housing. The U.S. Internal Revenue Service (IRS) allocates program funds on a per capita basis to each state. The Washington State Housing Finance Commission (WSHFC) administers the tax credits, and investors in housing projects can apply for different tax credits depending on the project type. LIHTC is the largest federal program for the production and rehabilitation of affordable housing.

Community Revitalization Financing (CRF). The CRF authorizes creation of tax increment areas where community revitalization projects and programs are financed by diverting a portion of the regular property taxes imposed by local governments within the tax increment area ([Chapter 39.89 RCW](#)). Counties, cities and towns may use this financing tool. HB 2497 (laws of 2020) added creating or preserving permanently affordable housing to the list of eligible public improvements for this funding, required for at least 40 years for rental housing and 25 years for ownership housing.

Linkage fees for affordable housing. A linkage fee is a fee charged by a local government on real estate developments to raise funds to help pay for the additional needs of the community that result from the additional development. Cities and counties may assess linkage fees on new commercial and residential developments to help fund affordable housing development within accessible commuting distance. The tax is typically assessed on a per square foot basis.

Increase affordable housing production

Affordable housing incentive programs. Any GMA city or county may enact or expand affordable housing incentive programs through development regulations or conditions on rezoning or permit decisions, or both, on residential, commercial, industrial or mixed-use development ([RCW 36.70A.540](#)). The program may include mandatory or optional elements, such as density bonuses within the urban growth area, height and bulk bonuses, fee waivers or exemptions, parking reductions, expedited permitting, tiny house communities or mandatory amount of affordable housing provided by each development. Incentive or bonuses housing units are for low-income rental (50% or less of county median family income) or for purchase (80% of county median family income), or other income levels as needed to address local housing market conditions. Housing must remain affordable for 50 years or a jurisdiction may accept payments in lieu of continuing affordability. Payment or property in lieu of housing is acceptable.

¹³⁷ Non-entitlement areas are cities with populations of less than 50,000 (except cities that are designated principal cities of Metropolitan Statistical Areas), and counties with populations of less than 200,000.

Density bonuses. A density bonus program incentivizes housing developers to provide public amenities or benefits in exchange for increased building capacity that exceeds what is permitted. The public amenities and benefits should tie into the community's needs and may include new affordable housing units. Density bonuses are best used in areas with strong demand for new construction.

Rezoning. Strategic rezones to higher intensities can expand the capacity for residential development in municipalities. A jurisdiction can upzone a large or small area, or individuals or groups of property owners can apply for an upzone. Some upzones may be accomplished within the framework of an existing comprehensive plan, though many will necessitate an update to the comprehensive plan. Consider this strategy if there is a deficit of development capacity relative to ongoing population growth, a deficit of development capacity of housing types that meet needs at various affordability levels, minimal activity in areas desired for development or redevelopment, or a lack of residential development near public infrastructure. Rezonings can lead to greater efficiencies in building that may lead to more affordable units, but they do not themselves ensure that new housing is affordable. Therefore, other tools or regulations may be needed to ensure new capacity leads to affordable housing opportunities.

Affordable housing overlay (AHO) zones. AHO zones are intended to help produce permanently affordable housing more quickly and at lower costs in neighborhoods that currently have little affordable housing. AHO zones place an additional zoning layer over base zoning. AHO zones provide incentive packages to developers who include affordable housing in their projects, such as impact fee waivers, enhanced density bonuses, reduced parking ratios, changes to setback requirements, relaxed height standards and by-right zoning. Incentives can also include expedited approval and permit processes. To qualify, developers must meet baseline affordability qualifications established by local zoning. For example, an AHO may require that between 25 and 100 percent of units in a development be affordable for households earning 50 to 80 percent of AMI. In addition, in places where land is not zoned for residential use but where a city would like to see affordable housing built, an AHO can eliminate lengthy permitting processes.

Zoning reforms. Amendments to local zoning codes and/or development standards can help facilitate the development of housing types that can be relatively more affordable. Eliminating or lowering minimum lot size requirements and floor area regulations, adjusting lot coverage requirements, adjusting permitted housing uses and right-sizing parking requirements are examples of zoning reforms that can encourage the market to produce more diverse and affordable housing. Examples of housing types that should be encouraged include accessory dwelling units, manufactured homes, multifamily housing, affordable ownership housing like townhouses and condominiums, micro-units or single-room occupancy developments.

Inclusionary zoning (IZ). A city or county may require the inclusion of affordable housing in new residential development projects where a city has decided to upzone or increase residential capacity (see [RCW 36.70A.540](#)). Within the umbrella of inclusionary zoning, there is voluntary inclusionary zoning and mandatory inclusionary zoning. A voluntary inclusionary zoning program allows developers to choose incentives or bonuses in exchange for providing affordable units, while a mandatory inclusionary zoning program requires that a minimum number of affordable housing units be constructed or provide a payment in lieu of construction.

Mandatory inclusionary zoning regulations often specify the minimum quantity of affordable units to be provided (often a percentage of the development's total dwelling units), the targeted income range of households served by the affordable units, the designated geographic area, and the time that the affordable units must remain affordable. All affordable units created through an inclusionary zoning program must remain affordable for at least 50 years.

Strategic infrastructure investments. Investments in sewer or water extensions or transportation infrastructure can support upzones or catalyze development around new amenities such as transit hubs or community centers. Strategic selection of infrastructure priorities in the capital facilities element can thus help support housing goals. Infrastructure investments should be paired with anti-displacement policies and programs if the infrastructure is located in areas at high risk of displacement.

Local programs to help build missing middle housing. HB 2343 (laws of 2020) amended the list of potential actions to increase residential building capacity in [RCW 36.70A.600](#) to include development of a local program that offers homeowners a combination of financing, design, permitting or construction support to build ADUs or to convert a single-family home into a duplex, triplex or fourplex where those housing types are authorized. A city may help property owners by identifying lenders, providing stock designs and/or helping property owners develop housing.

Transfer vacant/underutilized land and buildings. Washington State allows any state agency, municipality or political entity with authority to dispose of surplus public property to transfer, lease or dispose of such property for affordable housing for low-income and very low-income households ([RCW 39.33.015](#)). This transfer can lead to the effective use of publicly owned surplus and underutilized land and buildings to address community needs.

Multi-Family Tax Exemption. Any city and several counties¹³⁸ may establish a multi-family tax exemption (MFTE) program to stimulate the construction of new, rehabilitated or converted multi-family housing, including affordable housing, within designated areas ([RCW 84.14](#)). Under this program, communities may choose to offer an eight-year property tax exemption for qualifying residential improvements that add new housing units in a "residential targeted area" designated by a local council. They may also offer 12- and 20-year exemptions for developments that include income-restricted units. Different program options are available to cities and counties based on different criteria. More information on the MFTE program is available on [Commerce's MFTE webpage](#),¹³⁹ with a summary of the various current program characteristics on page 13 of the [Multi-Family Housing Tax Exemption Workbook](#) (2022).¹⁴⁰

Impact fee waivers. Counties, cities or towns charging impact fees can waive up to 100% of fees for permanently restricted affordable housing (for rental or purchase) for households earning less than or equal to 80% AML. Jurisdictions may waive eighty percent of fees; but if 100% of fees are waived, 20% must be paid with other public moneys. A school district receiving impact fees must approve any exemption. See [RCW 82.02.060](#).

ADUs/DADUs. Accessory dwelling units (ADUs) are small dwelling units that are either attached to the primary dwelling or in a detached structure (DADU) that is typically placed to the side or rear of the primary dwelling. ADUs have long been an important option for communities to add variety and housing choice in low-density neighborhoods. ADUs can increase housing options in established neighborhoods. ADUs can also offer a critical source of monthly income for homeowners when rented out, thereby allowing individuals to stay in their homes when their incomes are static or prices in the area are increasing.

¹³⁸ Clark, King, Kitsap, Pierce and Snohomish Counties may offer MFTE programs.

¹³⁹ <https://www.commerce.wa.gov/serving-communities/growth-management/growth-management-topics/planning-for-housing/multi-family-housing-property-tax-exemption-program/?aiEnableCheckShortcode=true>

¹⁴⁰ <https://deptofcommerce.app.box.com/s/ij5o80ne5e1740mmh6u05qrjk047g3cw>

In Washington, cities and towns with a population greater than 20,000 are required to allow ADUs in single-family zones ([RCW 43.63A.215](#)). This requirement also applies to counties planning under the GMA or with a population greater than 125,000. New 2020 state laws added new definitions and requirements related to ADU parking ([ESSB 6617](#)).

Zoning supporting smaller housing typologies such as micro-apartments and tiny homes. Smaller housing units often provide more affordable housing opportunities. Micro-apartments are small living units that provide a combination living room and bedroom, small kitchen and bathroom and usually range anywhere from 100 to 500 square feet, smaller than most studio apartments. Tiny homes are housing units of no more than 400 square feet that contain a kitchen, bathroom and sleeping/living area and must comply with Washington State Building Code. In addition to being more affordable on a square foot basis, these housing types are desirable to some populations who do not need a lot of space.

Waive, reduce or defer fees and charges for low-income housing projects to incentivize affordable housing. Fee waivers or fee reductions can reduce up-front costs of construction for residential development. Fees, such as impact fees, utility connection fees and project review fees, can run in the tens of thousands of dollars per unit for residential properties. Waiving some or all of these fees for income-restricted units or reducing or scaling fees for different types of housing (like cottage housing or smaller housing types) can be a valuable incentive for encouraging the production of housing.

Community examples

Category	Community / example
Increasing Affordable Housing	
Generate Revenue for Affordable Housing: Levy, Sales Tax, REET, Lodging Tax, CDBG, HOME, LIHTC, CRF, Linkage Fees	<p>REET, Trust, Other: Langley H-4.2 - Work with Island County and other local governments to investigate and implement regional funding options to support the development and/or maintenance of affordable housing such as a regional housing trust fund, regional housing tax levy, real estate excise tax or other mechanisms.</p> <p>Levy and Other Funding Policy: Bellingham, Policy H-22 - Support and expand low-income housing programs and public funding (e.g., the Housing Levy and HUD entitlement funds).</p> <ul style="list-style-type: none"> Bellingham Housing Sales Tax, Levy Funds, CDBG Funds and Housing Constructed as of 2021 (see Funding tab) <p>General Funding/Resources: Jefferson County, Policy HS-P-3.3 - Reinvigorate cooperative City of Port Townsend / County coordination regarding affordable housing, low-income and special needs household assistance and regulatory updates to support affordable housing development throughout Jefferson County. Determine and fund staffing and other resources necessary to sustain continuous coordination regarding affordable housing.</p> <ul style="list-style-type: none"> Jefferson County Sales Tax Ordinance, Housing and Related Services, 11-1221-20 <p>Linkage Fees: Seattle Policy H 5.18 - Consider implementing programs that require affordable housing with new development, with or without rezones or changes to development standards that increase development capacity.</p> <ul style="list-style-type: none"> Seattle Mandatory Housing Affordability Program

Increase
Affordable
Housing
Production:
Incentives,
Bonuses,
Inclusionary,
Rezoning,
Overlays, MFTE

Incentives/Bonuses Policy:

- [Ellensburg, Goal H-2, Policy B, Program 2](#): Evaluate, review, revise and publicize the density bonus incentive program.
- [Langley, H - 4.1](#): Explore innovative techniques that enable increased housing affordability including but not limited to long term rentals of accessory dwelling units (ADU), a housing trust fund, inclusionary zoning, density bonuses, smaller lot size, elimination of minimum lot size with appropriate open space, expediting permit processing, exempting Real Estate Excise Taxes (REET) to qualified sellers; incentives such as reduced or waived connection fees and reduced parking requirements, form-based codes, mixed use planned unit development, and other provisions to be determined.
- [Poulsbo Policy HS-4.3](#): Provide density bonus opportunities in the City's Zoning Ordinance for development proposals that provide low- to moderate-income housing units. Provide criteria and process for ensuring that those units remain affordable over time.

Inclusionary Housing:

- [Everett Policy 4.3.2](#): Consider inclusionary housing measures, as appropriate, along with affordable housing incentives as necessary to promote affordable housing in the Everett Planning Area.
- [Tacoma Policy H-4.15](#): Modify and expand the City's inclusionary housing provisions to target unmet need and align with market conditions.
- [Kirkland Policy H-3.2](#): Require affordable housing when increases to development capacity are considered.
- [KZC 112.15 Affordable Housing Requirement](#): All developments creating four or more new dwelling units in commercial, high density residential, medium density and office zones shall provide at least 10 percent of the units as affordable housing units.

Zoning/Overlays, Income Restricted Development: [Mount Vernon, Policy 4.1.2](#): Evaluate the adoption of zoning regulations that would allow multi-family residential developments that are income-restricted to those at or below 60 percent of the area median income for at least fifty years to be located in zoning districts other than multifamily residential.

- Example: Overlay, Permanent Supportive Housing Regulations, [Mount Vernon, MVMC 17.67](#)

Zoning/Affordability and Access: [Tacoma Policy H-4.4](#): Facilitate the expansion of a variety of types and sizes of affordable housing units, and do so in locations that provide low-income households with greater access to convenient transit and transportation, education and training opportunities, Downtown Tacoma, manufacturing/industrial centers, and other employment areas.

MFTE Policy: [Ellensburg, Goal H-2, Policy B, Program 1](#): Expand the Multifamily Tax Exemption program beyond the downtown area to encourage multifamily housing in other areas where it is needed.

Strategic Funding – Acquisition: [Chelan County Policy H 4.4](#): Support the Housing Authority or other agency's efforts to acquire and development lands for low-income housing.

- Example: [Chelan County Cascade Public Infrastructure Fund](#): Helps finance public projects that facilitate the creation or retention of businesses and jobs or permanently affordable housing opportunities in the county.

ADUs/Multiplex: [Spokane, H 1.18 Distribution of Housing Options](#): Promote a wide range of housing types and housing diversity to meet the needs of the diverse population and ensure that

Category	Community / example
	<p>this housing is available throughout the community for people of all income levels and special needs.</p> <ul style="list-style-type: none"> Example: Building Opportunity and Choices for All pilot program allowing attached homes, duplexes, triplexes, and fourplexes citywide. <p>Missing Middle Housing: Langley, H-1.3: Enable the 'missing middle' housing typology that includes row housing, townhouses and small-scale apartments to be developed as infill within existing single-family neighborhoods.</p> <p>Remove Permit Barriers: City of Yakima 5.1.10: Remove barriers to development of affordable and market rate housing. * Maintain a zoning system that allows a wide range of housing types and densities. * Use creative SEPA tools such as exemption thresholds, infill and mixed-use exemptions, or planned actions to encourage housing and streamline permitting. * Ensure that City fees and permitting time are set at reasonable levels so they do not adversely affect the cost of housing.</p> <p>Surplus Land: City of Chelan Policy HO V-5: Where appropriate, work in partnership with other public entities to facilitate use of surplus public land (including land owned by the City and by other entities, such as the Chelan County PUD) for affordable housing development.</p> <ul style="list-style-type: none"> Example: Public land zoning amended in 2017 to allow affordable housing.

Preserve existing affordable housing

Mobile home park preservation

Mobile homes and mobile home parks can provide housing at relatively affordable price points compared to site-built housing that is similarly located and sized. They offer an affordable housing option with a one-story floor plan that is attractive to people with mobility restrictions and older adults. They are often some of the only homeownership options available to households with lower incomes, households that are underserved by local housing markets. Providing policy support in the comprehensive plan for preservation of mobile homes and establishing a separate zone for mobile home parks can help preserve this unique housing type. Several jurisdictions in Washington State use Mobile/Manufactured Home Zoning as a tool to regulate parks and promote their preservation by limiting the ability of the landowner to convert the land to other uses, including other residential uses. This approach has been affirmed by Washington's Supreme Court through *Laurel Park Community, LLC v. City of Tumwater* (2012), which concluded that the City of Tumwater rezoning properties as "Manufactured Home Parks" did not represent a taking of the owners' interest in the parks.

Mobile home park conversion to cooperative

A community investment program for mobile home parks offers financial tools that enable mobile home park residents to organize and purchase the land that serves their community. Mobile home parks often house moderate- and low-income residents, and this program, which operates as a cooperative, protects residents from unexpected rent increases over time. This helps to preserve this important form of affordable housing. It also empowers residents to complete much-needed deferred maintenance projects. The Washington State Housing Finance Commission (WSHFC), in partnership with Resident Owned Communities (ROC) Northwest and ROC USA, offers the financial tools and expert guidance for manufactured-home ("mobile home") communities to become self-owned cooperatives. The WSHFC works in partnership with ROC USA to provide

financing for the purchase, and sometimes improvement, of the property. This financing means a bank loan with favorable terms for the cooperative.

Support third-party purchases of existing affordable housing

Community-based organizations, nonprofits and community land trusts (CLTs) can be important property owners within a neighborhood. Using public resources to empower trusted institutions can preserve or create affordable housing and space for community-serving organizations and businesses. Municipal and other funds can assist these institutions in land and property acquisition efforts that preserve affordable housing and prevent displacement within a neighborhood. Policy support for these programs in the comprehensive plan can provide a basis for their implementation.

Support Community Land Trusts

A Community Land Trust (CLT) is a private, nonprofit organization created to acquire and hold land and provide long-term affordable access to land and housing for community residents. Using a shared-equity housing model, CLTs are an important anti-displacement tool that removes land from the speculative real estate market and uses it to provide affordable housing to low- and moderate-income families. The land is owned by the nonprofit organization that helps to preserve land and buildings for long-term affordable use by communities, while the community residents own the homes. By offering lower barriers to homeownership, including lower initial and overall costs, CLTs provide underserved communities with more opportunities to become homeowners and develop equity.

Policy support for CLTs and for technical assistance to build the capacity of local organizations to create CLTs can be an anti-displacement tool. Funding to acquire the land may come the city, county and state through real estate excise tax and property taxes.

Retain affordability over time

Long affordability periods. In rapidly changing housing markets, it would do little good to require affordable housing without providing a mechanism to ensure that the units remain affordable over time. If programs to create affordable housing are to create and preserve mixed-income communities, long-term restrictions are vital for the programs to have a lasting impact. If homes expire out of the affordability program and return to market rate after a few decades, the program will not actually increase the stock of affordable housing in the long term. It is therefore important for affordable housing programs or incentives to adopt very long-term affordability periods.

One recommended approach to preserve affordability is to ensure functionally permanent affordability where units must remain affordable in perpetuity, for 99 years or for the life of the building. Programs with shorter affordability restrictions can preserve affordability in perpetuity by “resetting the clock” on each transaction and by maintaining the preemptive option to purchase the unit back upon transfer.

Notice of Intent to Sell ordinance. A city may also enact a “Notice of Intent to Sell” ordinance that requires a property owner with at least one affordable unit to notify the city and tenant when selling the property. This ordinance can help tenants seek potential anti-displacement protection and relocation resources and allows the city to evaluate the property and utilize related tools, including affordable housing preservation incentives and property acquisition.

Community examples

Category	Community / example
Preservation programs and facilitation	<p>Mount Vernon, Policy 2.2.4: In cooperation with Skagit County, the City should encourage the preservation of existing housing. Private investment should be encouraged in older residential neighborhoods, manufactured home parks, and multifamily complexes to ensure the health, safety and affordability of existing housing. Programs supporting weatherization, home repair and rehabilitation, and infrastructure maintenance should be supported.</p> <p>Skagit County, Policy 7B-1.1: Facilitate the rehabilitation and reuse of existing structures for housing by allowing reduced permitting fees and “grandfathered” development standards.</p>
Mobile home park preservation	<p>Snohomish County, Housing Element 1.B.3: The county shall support the development and preservation of mobile and manufactured home parks.</p> <ul style="list-style-type: none"> • Subsection a. Create a comprehensive plan designation and development regulations that will encourage the long-term preservation of mobile and manufactured parks. • Subsection b. Investigate the development of site size and buffering standards for mobile and manufactured parks that permit development in all medium and high-density residential zones and conditional development in low-density residential zones. <p>City of Chelan, Policy HO III-3: Allow mobile home parks in one or more zoning districts and adopt and enforce development and maintenance standards to keep housing condition and livability high in the parks and the neighborhoods in which they are located.</p> <ul style="list-style-type: none"> • Example: City of Chelan Mobile Home Park Zone <p>City of Bothell, Policy HHS-P11: Promote the retention of existing mobile/manufactured home parks throughout the City as a source of affordable detached single-family housing, both for rental and ownership, through the Mobile Home Park Overlay zone and other strategies.</p> <ul style="list-style-type: none"> • Example: City of Bothell Mobile Home Park Overlay zoning classification (BMC 12.04.100)
Third-party purchases of existing affordable housing	<p>Tukwila, Housing Element Policy 3.2.7: Support the acquisition of housing developments by private and public affordable housing groups, by acting as a facilitator between affordable housing groups and property owners to aid in the preservation of affordable housing.</p>
Community Land Trusts	<p>Seattle, Policy H 5.26: Explore implementation of models that could provide opportunities for affordable homeownership, such as community land-trusts, down payment assistance, mixed income housing requirements and limited equity housing co-ops.</p> <ul style="list-style-type: none"> • Example: Homestead Community Land Trust, Greater Seattle/King County area <p>Skagit County, Policy 7A-1.8: Develop growth strategies and housing and human service programs to plan for affordable housing within the regional context. In collaboration with the cities and housing providers, address the countywide need for ownership and rental housing affordable to households with moderate, low and very-low incomes. Work towards a common goal of having 40 percent of the countywide housing stock affordable at or below 80 percent of the area median income (AMI), with an intentional focus on expanding the supply of housing affordable at or below 50 percent of the AMI. Develop objectives for housing affordable to different income ranges and special needs populations.</p> <ul style="list-style-type: none"> • Example: Home Trust of Skagit

Protect existing communities

In addition to the policy options listed below, additional policies around commercial stabilization, job training and business development for residents in at-risk areas, preservation of cultural facilities, financing of cultural spaces and support for new businesses in at-risk areas are components of a robust anti-displacement strategy. These policy options are tied to economic development and cultural preservation and addressed through policies outside the housing element of the comprehensive plan.

Homeownership programs

Support programs that provide financial assistance to low-income homeowners through down payment assistance. Saving enough money for a down payment can take many years, and economic displacement pressures often push households to relocate long before they save enough for a down payment. Down payment assistance programs offer no interest or low-interest capital for qualified buyers. Many programs support first-time homebuyers and can be accompanied with homeownership education courses to support financial preparedness for first-time homeowners. Policy support for a down payment assistance program can help lower-income families purchase a home, thereby stabilizing monthly housing payments, building equity and preventing risk of displacement.

Support homeownership with foreclosure education and counseling programs. Agencies like WSHFC offer housing education and counseling programs. Through local partnerships, WSHFC helps homebuyers learn how to purchase and maintain a home. Commission-sponsored homebuyer education seminars are free; open to the public; and include information about the Commission's first mortgage programs, down payment assistance and other loan programs. Seminars are accepted by all affordable housing loan programs as meeting or exceeding educational requirements.

Support programs that offer home repair and rehabilitation assistance. Homeowner rehabilitation assistance programs provide funds to income-eligible owner-occupants to assist with the repair, rehabilitation or reconstruction of their homes. The goal of these programs is to allow homeowners who might not otherwise be able to afford necessary repairs to maintain a safe and healthy living environment. Owners can use these funds to bring a property up to code, tend to electricity or plumbing issues, repair the roof and floor, or make upgrades that enhance the home's energy efficiency or accessibility. These programs can help prevent the displacement of low-income households who otherwise may struggle to keep their home in livable condition.

Support home mortgage loan programs. WSHFC currently operates two mortgage loan programs: Home Advantage and House Key Opportunity. The Commission works through a network of participating lenders who originate and close the loans.

Fee waivers for water or sewer connection. Waiver or delay of tap-in charges, connection or hook-up fees for low-income persons for water, sanitary or storm sewer, electricity, gas or other utility are available. Implementing an ordinance that allows such waivers or delays of fees can help reduce costs for units that are designated for low-income households. While no specific income level is detailed, the reference to "low-income" presumes that household incomes should be less than 80% AMI (see [RCW 35.92.380](#)).

Rental assistance

Administered by HUD and managed at the local level by public housing agencies, the Housing Choice Voucher program provides rental assistance to help recipients live in privately owned rental housing of their choice. While this is a federal program, local public housing agencies have many discretionary decisions available to them to tailor the program to local needs and priorities.

Cities can provide assistance to renters to supplement tenant-based rental assistance provided through the federal Housing Choice Voucher (HCV) and/or HOME programs. Cities can tailor eligibility for this assistance to local needs and priorities. Cities can also provide security and/or utility deposit assistance as part of the program to increase their ability to protect vulnerable households. In some cases, these funds are provided as short-term emergency assistance to households at risk of homelessness or to cope with situations such as the COVID pandemic. For example, the City of Seattle's Rental Assistance Program provided assistance during the pandemic. Between April 2020 and February 2022, the Seattle Office of Housing and partners distributed rental assistance funding through implementation of three programmatic approaches: working with Community Based Organizations (CBOs), nonprofit affordable housing providers and United Way of King County (UWKC).

Tenant protections

Tenant protections help avoid or slow the process of displacement for households by providing access to legal resources, more time and/or resources to find another place to live. The Residential Landlord-Tenant Act ([RCW 59.18](#)) is the primary statute regulating landlord-tenant relationships at the state level, and there are several policies and programs that go further at the local level. Some programs designed to protect tenants could be implemented in whole or in part by cities. Others could be led by partner community organizations but supported through referral and resource contributions on the part of a city. Policy support for these programs in the comprehensive plan can provide a basis for their implementation. Some examples include:

Right to return policy. A "Right to Return" policy helps to reverse effects of past physical displacement by giving highest preference for housing support to those who can show that they were forced to move in the wave of displacement that occurred to make way for new development, including recently constructed streets, other infrastructure or other development. These policies can also be designed to give current or formerly displaced residents preference for income-restricted housing or provide down payment assistance for first-time homeowners who can prove that they have been victims of displacement.

Rental inspection and registry program. Rental registry programs inspect and inventory rental units for health and safety, adequate weatherproofing, provision of emergency egress, proper ventilation and functional utilities under existing regulation. They help preserve rental units overall and provide a third-party actor in cases where renters feel they do not have the power to address safety and legal concerns with property owners directly. Keeping existing housing in good repair prevents displacement due to deterioration of housing.

Support for tenant education and property owner incentive programs. Tenant education can be offered to both prospective and current renters. Topics such as Fair Housing Laws, rental screening and communication with property owners prepare individuals to become successful tenants. In addition, making reporting requirements for violations easier and more user-friendly can support tenants. Pairing this education with reimbursements or monetary incentives for property owners to rent to graduates of the tenant education program can help renters. Educating landlords/property owners to reduce income discrimination (section 8 voucher, disability income, etc.) is another intervention. This type of support can address displacement.

Deferral of property tax. Extremely low, very-low and low-income households may apply to defer payment of 50% of special assessments or real property taxes, or both, provided the household's combined disposable income is \$57,000 or less and the claimant has paid one-half of the total assessments and taxes for the year ([RCW 84.37](#)). The Washington State Department of Revenue pays one-half of the annual property taxes on their behalf.

Tax deferral for retired persons. [RCW 84.38](#) allows eligible agencies to provide tax relief to eligible households earning less than 75% AMI. This deferral program is intended to assist retired persons in maintaining their dignity and a reasonable standard of living by residing in their own homes without requiring assistance from welfare programs.

Tax deferral for specific individuals. Property tax exemption for seniors or veterans with certain qualifications are also an option ([RCW 84.36.381](#)). The Washington State Department of Revenue pays one-half of the annual property taxes on their behalf.

Tenant Right to Counsel. Provides renters access to legal representation in eviction cases. Programs may target households below a specified income level.

Sewage and solid waste fee assistance programs. [RCW 35.92.020\(5\)](#) allows a city or town to provide assistance to aid low-income persons for sewer and solid waste fees.

Relocation assistance. Neighborhoods that are rezoned may see an increase in demolition of existing housing units to build newer, higher-density housing types. This process displaces existing tenants who then incur moving costs. Local governments, authorized by [WAC 365-196-835](#) and detailed in [RCW 59.18.440](#), can pass an ordinance that requires developers, public funds or a combination of the two to provide relocation funds for these displaced tenants. Tenants at or below 50% of the county median income, adjusted for family size, qualify for available funds. Resident relocation assistance because of public action is required, with details outlined in [RCW 8.26](#).

Tenant Opportunity to Purchase (TOPA). A “Tenant Opportunity to Purchase” policy provides tenants with the first opportunity to purchase and the right of first refusal when a property owner sells or demolishes a rental housing unit. This protection provides a tenant with the opportunity to form partnerships with other organizations such as land trusts and cooperatives, and helps prevent displacement of a tenant.

Regulate short-term rentals. Many communities have adopted short-term rental (STR) regulations to reduce their impact on displacement and housing affordability. A first step may be to track STR activity by requiring registration and reporting from owners of these units. Policy regulations should prioritize actions that reduce the likelihood of converting long-term rentals into STRs. Some examples include:

- Regulate number of days for use of short-term rentals,
- Limit zones in which short-term rentals are allowed, and
- Limit number of units that any host can provide as short-term rentals.

In addition, as a mitigation measure, STRs can be charged transient rental or hotel taxes, with revenue contributing to anti-displacement initiatives.

Community examples

Category	Community / example
General homeownership programs	<p>Lakewood, LU-4.8: Subject to funding availability, conduct periodic surveys of housing conditions and fund programs, including housing rehabilitation, to ensure that older neighborhoods are not allowed to deteriorate.</p> <p>Lakewood, LU-2.6: Encourage home ownership opportunities affordable to moderate income households.</p> <p>Lakewood Station District Subarea Plan: Encourage homeownership options that allow local residents to invest in the community to gain equity and wealth.</p>
Rental assistance	<p>Kenmore 2022 Amendments, Policy H-1.2.1: Implement tenant protections that increase housing stability such as notice of rent increase and just cause eviction for tenants on termed leases.</p>
Tenant protections	<p>Renton Housing and Human Services Element, Policy HHS-12: Encourage expansion of programs that result in home repair, weatherization, and other energy-efficient improvements to owner-occupied and rental housing, and promote additional funding for these programs at the state and federal level.</p> <ul style="list-style-type: none"> Example: Renton Rental Registration Program <p>Tukwila Housing Element, Policy 3.4.1: Continue to improve the condition of rental housing through administration of the Residential Rental Licensing and Inspection Program.</p> <ul style="list-style-type: none"> Example: Tukwila Residential Rental Licensing and Inspection Program
Relocation assistance	<p>Kenmore, 2022 Amendments, Policy H-34.1.35: When displacement is unavoidable, determine who is most likely to be harmed and ensure that the brunt of the impact is not carried by the same communities in Kenmore. Support relocation assistance and development of replacement housing to be developed, where feasible, to help very low- and low-income households. For mobile home parks in particular, consider a funding pool to assist low- and moderate-income residents in deteriorating and obsolete mobile homes to find alternative housing in the community, or help to establish preferences in nearby housing for persons giving up their homes.</p>
Anti-displacement, create permanently affordable housing	<p>Portland, Housing Policy 5.16: Involuntary displacement: When plans and investments are expected to create neighborhood change, limit the involuntary displacement of those who are under-served and under-represented. Use public investments and programs, and coordinate with nonprofit housing organizations (such as land trusts and housing providers) to create permanently-affordable housing and to mitigate the impacts of market pressures that cause involuntary displacement.</p>
Regulate short-term rentals	<p>Chelan Housing Element, Policy H 2.4: Encourage appropriate placement and use of vacation rentals.</p> <ul style="list-style-type: none"> Example: Chelan's short-term rental license requirement and limits to locating short-term rentals to specific land use zones.

Ensure the benefits of investment and development are equitably distributed

Community Benefits Agreements

Development agreements or community benefit agreements (CBAs) are voluntary, negotiated contracts between developers and municipalities or between developers and a community-based organization representing the interests of the community, respectively. These agreements specify public benefits that the development will provide, along with the responsibilities of each party. They can support affordable housing, affordable commercial space, community gathering spaces and other public amenities. These public benefits should align with the community's needs and desires. The agreements provide assurances to developers that certain development regulations or community support will not change during the term of the agreement and a city or community-based organization can, in turn, require conditions to mitigate project impacts, clarify project phasing, mitigate displacement of cultural institutions and provide public improvements. Policy support for these agreements in the comprehensive plan can help in their implementation.

Support community-led investments

Local governments can invest in community-led investments. Actions that support community and fund community organizations and nonprofits to create community-owned assets such as affordable housing developments, community space preservation projects and small business support projects are examples.

Community examples

Category	Community / example
Geographic distribution	Washington, DC, Housing Element, Policy H-1.2.9: Advancing Diversity and Equity of Planning Areas : Proactively plan and facilitate affordable housing opportunities and make targeted investments that increase demographic diversity and equity across Washington, DC. Achieve a minimum of 15 percent affordable units within each Planning Area by 2050. Provide protected classes (see H-3.2 Housing Access) with a fair opportunity to live in a choice of homes and neighborhoods, including their current homes and neighborhoods.
Healthy, equitable and affordable housing	Renton Housing and Human Services Element, Goal HHS-H : Actively work to increase the availability of healthy, equitable, and affordable housing for people in all demographic groups and at all income levels and promote a balance of housing and the amenities needed by residents at a neighborhood level, such as childcare, availability of fresh food, recreational opportunities, and medical care.
Capital investment distribution	Burien Equity Element, Pol. EQU 1.5 : Burien shall develop its Capital Investment Plan with a goal of providing equitable access to municipal services such as roads, pedestrian and bicycle facilities, park facilities, and street trees.

Category	Community / example
Amenity and infrastructure distribution	<p>Everett Parks Recreation and Open Space (PROS), Policy 9.5.1: Phase improvements in the park and trail system to remove barriers and increase equity through:</p> <ul style="list-style-type: none"> • Improving existing parks. • Opening undeveloped parkland in the City's inventory. • Adding new trails that connect neighborhoods to existing parks. • Adding new parks. • Adding or improving tree canopy. <p>See Section 4.1 of Parks Plan, Equitable and Sustainable Access. Parks funding prioritization based on equity. See Exhibit 1.1-10 and Appendix 12.3 Example Project Evaluation.</p>

Existing tools and designations such as Main Street districts, cultural districts and creative districts can also prevent cultural displacement either through protection, proactive planning efforts or local community-based partnerships. Engagement at the local level with impacted communities is needed to make sure these are effective. Expanding the use of these various district types may help prevent additional cultural displacement through robust outreach and information exchanges at the local level.

Monitor for equitable outcomes

Ongoing monitoring using defined measures is important to ensure policies are working as intended to address racially disparate outcomes, exclusion, displacement and displacement risk. Monitoring also provides an early warning system that can alert jurisdictions to successes or failures so that resources can be focused on actions that are the most effective for communities of interest.

A robust monitoring program should include both implementation and performance monitoring. Implementation monitoring should track the extent to which policies are being implemented. Performance monitoring should track whether policies are achieving the desired results. Some examples of monitoring policies are included below.

- [Bellingham Housing Element, Policy H-25:](#) Monitor the City's housing affordability market, including housing demand by housing type across all income levels and in all neighborhoods, and report on the effectiveness of the City's housing affordability policies.
- [Covington Housing Element Implementing Action, Exhibit HO-4:](#) Monitor housing supply, affordability, and diversity as part of Comprehensive Plan Updates and at the time of the annual Office of Financial Management building permits report, Multifamily Tax Exemption annual reporting to the State Department of Commerce, and the King County Buildable Lands Report. Adapt plans and codes as needed to meet the local housing need and share of the countywide need.
- [Mount Vernon Housing Element, Policy 4.4.1:](#) Consider adopting a schedule to have the Community & Economic Development Department (CEDD) report to Council on the number of renters and owners that are paying 30% or more of their income on housing in the Mount Vernon Metropolitan Statistical Area (MSA) as reported through the Comprehensive Housing Affordability Strategy (CHAS) Data Query Tool from the U.S. Department of Housing and Urban Development (HUD). ...This report could provide Council with an opportunity to reassess and adjust policies and development regulations to meet low-income housing needs.

- [Skagit County Housing Element, Policy 7A-1.7:](#) Work with the Skagit Council of Governments to establish a program for regular updating of the Housing Needs Assessment, including provisions to monitor and assist in providing affordable housing opportunities. The Assessment should be updated on a regular basis, several years in advance of each periodic GMA required Comprehensive Plan update.
- [City of Spokane Housing Element, Policy H 2.5: Housing Goal Monitoring:](#) Provide a report annually to the City Plan Commission that monitors progress toward achieving the housing goals and includes recommended policy change if positive direction toward achieving the housing goals is not occurring.
- [City of Mountlake Terrace Housing Element, Housing Element Performance Measures:](#) For the Housing Element, the City of Mountlake Terrace has the following performance measures and will annually report on their progress. *Permits for 90 new housing units are issued per year, on average. [Note: A Comprehensive Plan amendment may be considered to adjust the above number as the City approaches its population target for the year 2035.] *Have achieved, by the date indicated, the stated actions in the “Actions to Take” section of this chapter.

Updating your Housing Element and Development Regulations

2025 Periodic Update Workshop Series

Anne Fritzel, AICP

HOUSING PROGRAMS MANAGER

JUNE 14, 2023

Attachment G



Washington State
Department of
Commerce

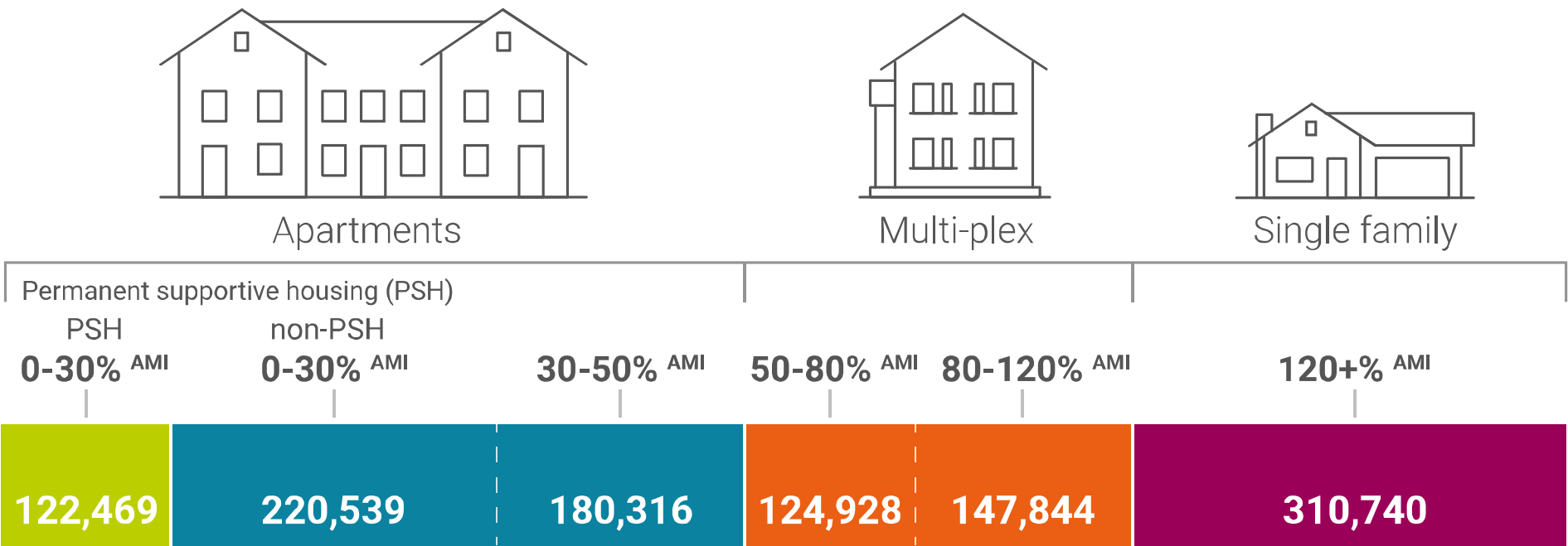
New Housing Element Requirements (HB 1220)

Local housing element to:

- 1) Conduct an **inventory and analysis of all housing needs**
 - by income, PSH and emergency housing (#s from Commerce)
- 2) **Identify sufficient capacity of land** for identified housing needs
- 3) Include **policies to support middle housing and other laws**
- 4) **Make adequate provisions for all housing needs**, including “document barriers to housing availability such as gaps in local funding, development regulations, etc.”
- 5) Address **racially disparate impacts, displacement, exclusion and displacement risk** in housing through policies and regulations

1.1 Million new homes will be needed in the next 20 years

Commerce directed to provide projections of housing need by income group, and for permanent supportive housing (PSH)



In addition, there will also need to be:

91,357
Emergency housing beds (temporary housing)

Item 7.

Housing For All

Tool for projected housing needs

Housing Needs Projections for Selected County, Projection Year, and Population Target
Complete Steps 1, 2, and 3 to access countywide projections

Step 1

Select a County

Thurston

✓

Step 2

Select a Projection Year

2045

✓

Step 3

Enter Population Target in Range

389,659

✓

Table 1: OFM GMA Population Projections, 2045
Thurston County Projected Population, 2045

	Low	Medium	High
Projected Population (2045)	345,246	389,659	431,732

Emergency
Housing/Shelter
Beds

1,562
626
936

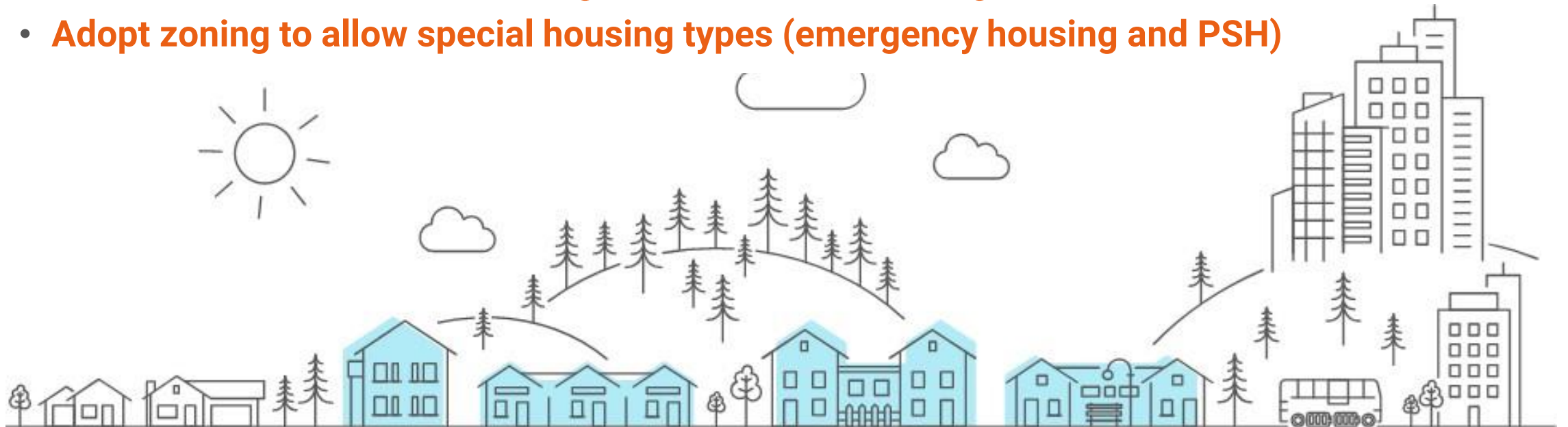
Table 2: Projected Countywide Housing Needs Based on User Inputs
Thurston County

Population Target = 389,659	0-30%			30-50%	50-80%	80-100%	100-120%	120%+
	Total	Non-PSH	PSH					
Total Future Housing Needed (2045)	174,682	11,636	3,774	20,858	46,625	30,824	19,898	41,067
Estimated Housing Supply (2020)*	120,334	2,879	180	12,428	38,356	26,452	15,518	24,522
Net New Housing Needed (2020-2045)	54,347	8,757	3,594	8,430	8,269	4,372	4,380	16,545

* Note: Supply of PSH in 2020 is beds. However, projections of Net New Housing Needed (2020-2045) are in housing units. See Overview tab for details.

Communities must allow a variety of housing for all economic segments. Strategies include:

- **Leverage high capacity transit with more intense development within walking distance**
- **Allow moderate density housing and ADUs in existing neighborhoods**
- **Rezone strip commercial to also allow more housing**
- **Incentives for affordable housing, consider home sharing, etc.**
- **Adopt zoning to allow special housing types (emergency housing and PSH)**



Next steps for jurisdictions

Allocate countywide housing needs to each jurisdiction

- Recommend counties use existing coordination process

Accommodate allocations by income bracket (land capacity)

- Identify capacity for allocated housing needs by income bracket
- Make adjustments to zoning to accommodate housing needs

Document programs and actions needed to achieve housing availability for each income bracket

- Review other regulations, fee structures, incentives, etc. which influence housing

Update comprehensive plan policies and regulations

Possible Land Capacity Findings

- Jurisdictions will likely find they don't have enough capacity for lower-income housing needs
 - Result: Need to add more zoning capacity for higher density housing types
- Rural areas do not support lower-income housing needs due to lot sizes and restrictions on type of housing
 - Result: Growth will need to be directed into cities, unincorporated urban growth areas, and where appropriate, LAMIRDs with infrastructure
- Areas that were not planned to be served by infrastructure may need attention in capital facilities plan to support needed capacities
- Jurisdictions may also need to update regulations allowing emergency housing and shelters, transitional housing and PSH

Resources for Updating your Housing Element

Book 1: Establishing Housing Targets for your Community

- [April 6 recorded webinar](#)
- [Housing for All Planning Tool](#) for allocation

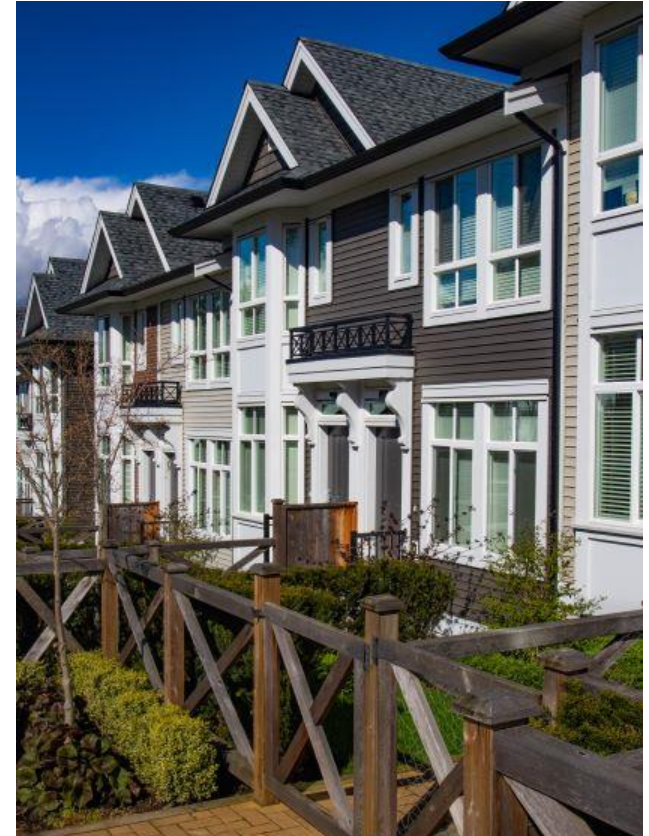
Book 2: Guidance for Updating Your Housing Element

- Land capacity guidance (step by step process)
- Checklists to document barriers to affordable housing
- [May 4 recorded webinar](#)

Book 3: Racially Disparate Impacts (RDI) Guidance

- [Dec 2022 Recorded webinar](#)
- RDI data and mapping for each jurisdiction (forthcoming)
- [May 24](#) Talking Race for Planners recorded webinar

www.commerce.wa.gov/serving-communities/growth-management/growth-management-topics/planning-for-housing/updating-gma-housing-elements/



Updating Development Regulations with New Housing Requirements

ADUs and Middle Housing

Local land use planning tools



Highlights for Code Updates

2015 – 2022 (due with update)

- Must allow permanent supportive housing, transitional housing and shelters
- Bonus density for land owned by religious organizations
- May not regulate number of people in a household
- Limit on amount of parking that may be required near transit
- Limits on regulating homeless encampments

2023 (due 6 months after update)

- Allow middle housing in cities over 25,000, or contiguous for certain jurisdictions (1110)
- Allow 2 ADUs within urban growth areas (1337)
- Unit lot subdivisions (5258)
- Schedule of proportionate impact fees (5258)
- Conversion of existing buildings (1042)
- Clear objective design standards (1293)
- Permit timelines by 01-01-2025 (5290)


HB 1337 (2023) accessory dwelling units



Local governments must, by **6 months after the periodic update due date**:

- Allow **two ADUs per lot in all GMA urban growth areas**.
- May not require the owner to occupy the property, and may not prohibit sale as independent units.
- Must allow an ADU of at least 1,000 square feet and adjust zoning to be consistent with HB 1337.
- Must set consistent parking requirements based on distance from transit and lot size.
- May not charge more than 50% of impact fees charged for the principal unit.

Comments on draft guidance **due June 15, 2023**.

<div>Item 7.</div> <div>HB 1110</div> <div>Middle housing</div>		Affected cities must allow	If affordable housing is included in the development	Middle within ¼ mile of major transit stop
Cities of 25k-75k population		2 du/lot on all lots*	4 du/lot if one is affordable*	4 du/lot *
Cities over 75k population		4 du/lot on all lots*	6 du/lot if 2 are affordable*	6 du/lot *
Cities <25k contiguous UGA with largest city in county > 275,000		2 du/lot on all lots*		
Alternate Approach		As above on 75 % of lots if <ul style="list-style-type: none">-Risk of displacement- Lack of infrastructure- Critical areas- One mile of SeaTac airport	As above on 75 % of lots. May not include: <ul style="list-style-type: none">- Within ½ mile of major transit stop- Redlined areas or exclusionary zoning	

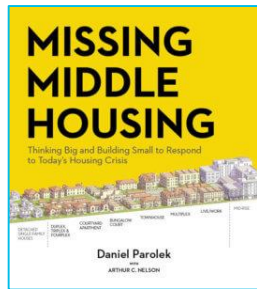
Commerce implementation of HB 1110

- **HB 1110 FAQ available now**
- **Middle housing grants coming**
- **Model middle housing ordinance(s)** by December 31, 2023
- Commerce also to provide
 - **Middle housing toolkit of traditional neighborhood design standards**
 - **Guidance** to carry out many of these tasks
 - Details on the content of a **parking study**
 - Procedures for Commerce review of ordinances

www.commerce.wa.gov/serving-communities/growth-management/growth-management-topics/planning-for-middle-housing/

Commerce products currently available

- Toolkit of potential design and development standards
- Photo library of middle housing types in Washington
- Answers to frequently asked questions about middle housing
- Pro-forma tool
- PowerPoint slide decks to share with local officials
- Videos of slide decks



Growth Management Housing Resources

- July 19th Housing workshop (10:00- 12:00)
- [WCRER housing data](#)
- [MFTE Guidance](#)
- [HB 1220 guidance](#) and [HAP Guidance](#)
- [Fall 2022 Housing survey](#)
- [Middle Housing Tools](#)
- [ADU Draft Guidance](#)
- Commerce housing messaging products - coming in June!
- [New tools for Equitable Transit Oriented Development](#)





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Department of
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Thank you!

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HOUSING PROGRAMS MANAGER

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