



CITY OF
TUMWATER

**GENERAL GOVERNMENT COMMITTEE
MEETING AGENDA**

**Online via Zoom and In Person at
Tumwater City Hall, Council Conference
Room, 555 Israel Rd. SW, Tumwater, WA
98501**

**Wednesday, September 13, 2023
8:00 AM**

1. Call to Order
2. Roll Call
- [3.](#) Approval of Minutes: General Government Committee, August 9, 2023
- [4.](#) 2025 Comprehensive Plan Periodic Update – Land Use (Brad Medrud)
- [5.](#) 2025 Comprehensive Plan Periodic Update – Housing (Brad Medrud)
6. Additional Items
7. Adjourn

Meeting Information

All committee members will be attending remotely. The public are welcome to attend in person, by telephone or online via Zoom.

Watch Online

<https://us02web.zoom.us/j/89413786058?pwd=UXptc1BYyIBWOTE5UTBwcURCNIRkQT09>

Listen by Telephone

Call (253) 215-8782, listen for the prompts and enter the Webinar ID 894 1378 6058 and Passcode 390866.

Public Comment

The public may submit comments by sending an email to council@ci.tumwater.wa.us, no later than 5:00 p.m. the day before the meeting. Comments are submitted directly to the Committee members and will not be read individually into the record of the meeting.

Post Meeting

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

Accommodations

The City of Tumwater takes pride in ensuring that people with disabilities are able to take part in, and benefit from, the range of public programs, services, and activities offered by the City. To request an accommodation or alternate format of communication, please contact the City Clerk by calling (360) 252-5488 or email CityClerk@ci.tumwater.wa.us. For vision or hearing impaired services, please

contact the Washington State Relay Services at 7-1-1 or 1-(800)-833-6384. To contact the City's ADA Coordinator directly, call (360) 754-4128 or email ADACoordinator@ci.tumwater.wa.us.

**TUMWATER GENERAL GOVERNMENT COMMITTEE
MINUTES OF VIRTUAL MEETING
August 9, 2023 Page 1**

CONVENE: 8:00 a.m.

PRESENT: Chair Michael Althausen and Councilmembers Joan Cathey and Leatta Dahlhoff.

Staff: City Attorney Karen Kirkpatrick, Community Development Director Michael Matlock, Finance Director Troy Niemeyer, Fire Chief Brian Hurley, Planning Manager Brad Medrud, Communications Manager Ann Cook, and Housing and Land Use Planner Erika Smith-Erickson.

**APPROVAL OF MINUTES:
GENERAL
GOVERNMENT
COMMITTEE,
JULY 12, 2023:**

MOTION: Councilmember Dahlhoff moved, seconded by Councilmember Cathey, to approve the minutes of July 12, 2023 as published. A voice vote approved the motion unanimously.

**ENTERPRISE RESOURCE
PLANNING SYSTEM
UPDATE:** Director Niemeyer briefed members on the status of transitioning to the Enterprise Resource Planning (ERP) system.

The first module of Financials and Productivity was activated on April 1, 2023. The installation was on schedule and within budget. Prior to the initiation of the second and third modules, staff discovered the pace of implementation was too overwhelming because additional resources were lacking to assist in transitioning to the new system. The transition has created some stress, burnout, and some turnover by staff. The next installation module is Payroll and HR. Staff anticipates some additional challenges that likely will delay implementation of the module.

Director Niemeyer reviewed the project timeline as initially adopted. The process began in early 2022. Following installation of Payroll and HR, the Utility Billing module is scheduled next for installation.

The project was initiated in 2017-2018 when the City began exploring options to meet City needs. Since then, the City has experienced a turnover in personnel directly involved in the installation of the new system, as well as the loss of a Database Administrator, and several Finance Directors. An Accounting Supervisor position was replaced several times over the last several years, as well as the City's Senior Accountant who retired.

Implementation of the HR module encountered some setbacks with

TUMWATER GENERAL GOVERNMENT COMMITTEE
MINUTES OF VIRTUAL MEETING
August 9, 2023 Page 2

the departure of the Administrative Services Director, the HR Manager, who is scheduled to retire at the end of September, and another position. The loss of personnel has encumbered the transition planned for October 2023 for HR and Payroll. The two modules cannot be split and installed separately as they are interrelated, which will necessitate a delay as the City fills the positions.

Other challenges include the loss of institutional knowledge as employees leave the City. Institutional knowledge is important as staff builds and implements the system because it requires process decisions, configuration decisions, and decisions inherent in the operation of the system. When employees leave the City, their background and knowledge are no longer available to the project.

Additionally, the project team has experienced a number of vendor issues. The vendor is also experiencing turnover of personnel with many new employees joining the company. The vendor, in some cases, oversold and under-delivered some actions involving the importation of data from the old system to the new system as well as the proposed project timeline.

Director Niemeyer reviewed a graph on the status of implementation with actual times that often involved much more time than indicated by the vendor. Initially, the City intended assigning 1.5 FTEs as project managers. The project management work has increased substantially. Some risks identified by the Project Manager include employee turnover, vendor's lack of experienced staff, and allocation of time by existing City staff.

Staff proposes a change to the timeline adjusting the activation of the Payroll and HR module to March/April 2024. Instead of overlapping phases during implementation, staff proposes implementation of only one module at a time to reduce stress on staff and ensure a smoother transition.

Director Niemeyer responded to questions about the status of the Financial module. The Financial module is operational except for several components that have been delayed. Employees provided feedback as they learned how to operate the new system. Four other system modules for installation include Payroll/HR, Utility Billing Phase 3, Intergov (permitting system), and Enterprise Asset Management. All system modules are interconnected with the Financial module.

Director Niemeyer reported the original project cost was approximately \$2 million, which included staff time and project

**TUMWATER GENERAL GOVERNMENT COMMITTEE
MINUTES OF VIRTUAL MEETING
August 9, 2023 Page 3**

management. The actual contract amount with Tyler Technologies was \$891,000. Phase 1 costs were under budget by \$20,000. Staff anticipates achieving similar results for Phase 2 as the vendor has reduced onsite visits. Staff recommends reallocating the savings from Phase 1 of \$20,000 to Phase 2.

Next steps include feedback from the committee and conceptual approval for a contract amendment with the vendor for a briefing to the Council for final approval of the amendment. Council approval is required to reallocate the savings from the first module to the second module. Director Niemeyer requested delegation of authority for any adjustment in the timeline or to issue a change order.

City Attorney Kirkpatrick advised members that if they support granting some authority to the Finance Director for future amendments, the committee should approve the Finance Director making changes as long as the budget amount is not increased.

MOTION:

Councilmember Dahlhoff moved, seconded by Councilmember Cathey, to recommend approval of providing flexibility on the timelines for the modules, as well as some flexibility of up to \$20,000 while remaining within the budget as presented for the Council's future consideration. A voice vote approved the motion unanimously.

**HAZARDS MITIGATION
PLAN FOR THE
THURSTON REGION
UPDATE:**

Planner Smith-Erickson briefed members on the Tumwater Annex and its relationship to the Hazards Mitigation Plan for the Thurston Region.

Because the region is susceptible to multiple natural hazard events of earthquakes, landslides, storms, floods, wildland fires, and other hazards destructive and costly to communities, the region developed the 2023 Hazards Mitigation Plan for the Thurston Region as a region-wide strategy to minimize the impacts of natural disasters.

Federal hazard mitigation requirements are outlined in the Disaster Mitigation Act of 2000, which require jurisdictions to adopt a federally approved Hazards Mitigation Plan to apply for or to receive federal mitigation assistance program grants. Federal mitigation planning requires the plan to be updated and reapproved every five years. The current Hazards Mitigation Plan was substantially updated in 2017. Staff is working with the Hazard Mitigation Workgroup and Thurston Regional Planning Council (TRPC) to update the plan. The Tumwater Annex addresses actions the City would take to address hazards commonly present throughout the City.

TUMWATER GENERAL GOVERNMENT COMMITTEE
MINUTES OF VIRTUAL MEETING
August 9, 2023 Page 4

Hazard mitigation is considered any action that reduces or eliminates long-term risks to life and property. The 2023 Hazards Mitigation Plan for the Thurston Region and the Tumwater Annex contain the City's strategies for preparedness, response, and recovery. Staff has been meeting with the Tumwater Fire Department, Water Resources, Parks and Recreation, Transportation and Engineering, and Communications to identify initiatives to include in the plan.

Hazard mitigation saves lives and reduces property losses, safeguards critical community lifelines, assists community members recover more quickly, and it reduces short- and long-term impacts to the economy and the environment while also reducing the costs of disaster recovery and reconstruction.

City staff and over 20 local agencies in Thurston County are working together on the plan. The workgroup meets monthly. Currently, the workgroup is in the public engagement phase. A website for the plan contains information on open houses, a survey for the community, and a copy of the 2023 Hazards Mitigation Plan for the Thurston Region, and Tumwater's Annex Plan. Plan adoption is scheduled to begin in December 2023.

The project manager for the plan is TRPC serving as the liaison between the jurisdictions, Thurston County, federal government, and state government. The 2023 Hazards Mitigation Planning Workgroup membership includes representatives from each plan partner and regulatory partners (FEMA, Washington Emergency Management Division, and TRPC).

Staff identified hazards to address and the initiatives to prioritize by utilizing a hazard risk rating model. TRPC contracted with Tetra Tech to complete the model and provide data to the workgroup. Each community's risk to a particular hazard varies based on several factors of probability, location, and sum of impacts on population, property, and the economy. The project examines hazard areas overlap with residents, homes, businesses, and other structures across Thurston County communities to identify an overall risk score. The scores are ranked low, medium, and high for each risk. The higher score warrants greater attention from the community to commit to actions that help protect vulnerable assets from future hazards.

The City of Tumwater conducted an online community survey to inform the community about the multijurisdictional plan update. The survey was available from June 6, 2022 through July 31, 2022. The survey included 12 questions specific to perceived risks and preferred mitigation activities in Tumwater. Tumwater received 55 responses. Earthquake was rated the highest concern by respondents

**TUMWATER GENERAL GOVERNMENT COMMITTEE
MINUTES OF VIRTUAL MEETING
August 9, 2023 Page 5**

followed by climate change, wildfire, extreme heat, severe storms, flooding, and other hazards.

Earthquake is the highest ranking risk with a score of 36. The plan does not address sea level rise. TRPC is working with the City of Olympia to address sea level rise. Survey respondents ranked severe weather as a medium risk followed by tsunami, which ranked zero to low. Although volcano/lahar was ranked zero to low the Tumwater Annex addresses volcano/lahar because of the Mount St. Helen's eruption and the substantial amount of ash fall experienced by the City. Survey respondents ranked wildfire as a medium risk.

Councilmember Cathey inquired about the lack of including climate change despite being ranked as the second most important risk according to respondents in Tumwater. Planner Smith-Erickson explained that within the Tumwater Annex, severe storm or weather incidents are addressed. The plan addresses reducing heat island affects, extreme heat, and wildfires. However the plan does not specifically speak to climate change partly because Tetra Tech did not specifically identify climate change.

Manager Medrud added that the scope for defining hazards was based on guidelines from FEMA. Staff recognizes climate change has multiple affects across the community. Those issues are captured in other risks pertaining to sea level rise, severe weather, and wildfires. While not necessarily identified separately, the plan addresses climate change through other identified risks.

Councilmember Cathey recommended that for the benefit of respondents, it would be important for climate change to be addressed in the plan as it would be difficult to calculate how climate change is tied to the effects of other risks.

Planner Smith-Erickson acknowledged the request.

Planner Smith-Erickson reviewed the correlation between the regional and local plan. The regional plan contains goals and objectives applicable county-wide with an overall risk assessment for all identified hazards. Tumwater City Council is responsible for adopting the 2023 Hazards Mitigation Plan for the Thurston Region as well as the Tumwater Annex containing specific City initiatives. The Tumwater Annex addresses compliance with National Flood Insurance, which is required for FEMA approval.

Councilmember Cathey asked whether the City has ever experienced a flood. Manager Medrud advised that the City experienced severe flooding on the brewery property, Pioneer Park, and the golf course

TUMWATER GENERAL GOVERNMENT COMMITTEE
MINUTES OF VIRTUAL MEETING
August 9, 2023 Page 6

approximately 10 years ago.

Planner Smith-Erickson added that the 2017 plan includes historical events of identified hazards mapped in the City. The 2023 update consider historical events and adds any new additional information specific to natural hazard events since the last update in 2017.

Planner Smith-Erickson reviewed the primary contents of the plan:

- Community Profile & Capability Assessment
- Risk Assessments – risks exist where vulnerable assets intersect with hazards

City of Tumwater mitigation initiatives (actions):

- Currently adopted
- Completed
- New
- Future land use plans, zoning, and development regulations

Draft Mitigation Initiatives – Earthquake

- Risk Ranking – High
- Four actions proposed:
 - Conduct a voluntary non-structural earthquake readiness inspection for all critical facilities on an annual basis (2017 HMP)
 - Have a professional engineer or otherwise qualified professional to assess infrastructure for earthquake vulnerability (2017 HMP)
 - Include retrofitting/replacement of critical system elements in Capital Improvement Plan (LOTT)/Capital Facilities Plan (City) (2023 Proposed)
 - Install auxiliary generator to power City main well/water supply (2023 Proposed)

Draft Mitigation Initiatives – Wildfire

- Risk ranking- Medium
- Five actions proposed:
 - Establish fire breaks and routine maintenance on Tumwater Hill adjacent to City property, the newly created City park, and the elementary school (2017 HMP)
 - Adopt the Washington Wildland-Urban Interface Code (WWUIC), International Building Code (IBC) and International Residential Code (IRC) to meet WUI requirements (2023 Proposed)

TUMWATER GENERAL GOVERNMENT COMMITTEE
MINUTES OF VIRTUAL MEETING
August 9, 2023 Page 7

- Update the City of Tumwater map to show wildland urban interface map layers to coincide with the 2023 Building Code Update (2023 Proposed)
- Routinely inspect the functionality of fire hydrants (2023 Proposed)
- Develop a vegetation management plan, incorporating proper species selection, planting, and maintenance practices into landscape code updates (2023 Proposed)

Councilmember Cathey asked for an update on the status of the City's review of the Washington Wildland Urban Interface Code. Manager Medrud advised that staff continues to meet with state agencies and local jurisdictions to determine how to address the new requirements in the code. Staff has not received any input indicative of any change in the requirements from the Washington Building Code Council. Staff is working on preparing an updated mapping of the City to assist in identifying areas that may or may not be affected by the code. At this time, he is not confident it would be possible to change the requirements for defensible space around buildings. The Legislature instructed the Building Code Council to pursue the amendments in 2019. The State Building Code Council updated the Washington Administrative Codes (WACs) based on that direction. The new code becomes effective October 29, 2023. Further work by staff is pending the resolution of another larger issue surrounding the energy code, which might move the deadline to some degree as the changes are tied together.

Draft Mitigation Initiatives – Severe Storm/Weather

- Risk ranking- Medium
- Four actions proposed:
 - Inspect all trees within falling distance of the four City-owned critical facilities to determine if they pose a hazard to the facility or operation of the facility during a storm (2017 HMP)
 - Reduce heat islands by implementing urban forestry code updates (2023 Proposed)
 - Modify land use and environmental regulations to support vegetation management activities that improve reliability in utility corridor (2023 Proposed)
 - Assess feasibility of installing solar power and battery storage at City Hall and Tumwater Library (secondary emergency operations center) (2023 Proposed)

Councilmember Cathey asked about the remaining two critical City facilities. Planner Smith-Erickson said the last two critical facilities

TUMWATER GENERAL GOVERNMENT COMMITTEE
MINUTES OF VIRTUAL MEETING
August 9, 2023 Page 8

are likely the two fire departments in addition to the library and City Hall.

Councilmember Cathey commented that the recent adoption of the Washington Wildland-Urban Interface Code speaks little about the role of trees and vegetation play in reducing the effects of climate change. Based on conversations with some legislators, there has been some pushback on the new requirements. Her concern is how the new requirements affect other City plans.

Planner Smith-Erickson said the public process includes online open house and survey opportunities until August 25, 2023 at www.trpc.org/hazards. Materials on the website enable viewing the regional plan initiatives as well as Tumwater's initiatives and provide feedback and participate in the survey for the initiatives. As of the previous day, the website has received three responses on Tumwater's plan. During the Thurston County Fair, she promoted the 2023 Hazards Mitigation Plan for the Thurston Region with the public and to advertise the City's plan to solicit feedback. Another public comment period is scheduled from September 25, 2023 through October 8, 2023. All 22 proposed initiatives are included in the survey.

The next step is completion of the draft Tumwater Annex by September 15, 2023. On September 23, 2023, the Emergency Preparedness Expo is scheduled affording another public outreach opportunity to educate and inform the public about the update, the initiatives, and hazard preparedness. On October 16, 2023 the 2023 Hazards Mitigation Plan for the Thurston Region and the Tumwater Annex will be submitted to Washington Emergency Management and by November, the City will submit the regional plan and the Tumwater Annex to FEMA for a completeness review.

A January 2024 work session and public hearing is scheduled with the Planning Commission followed by a February, March 2024 presentation of the plan to the City Council for consideration. Work is ongoing with City departments to finalize draft actions, conducting public engagement and outreach, and updating the hazard profiles and risk assessments.

**PRELIMINARY DOCKET
FOR 2023 ANNUAL
HOUSEKEEPING
AMENDMENTS:**

Planner Smith-Erickson briefed members on the 2023 Annual Development Code Housekeeping Amendments Preliminary Docket and a request to the Council to include the amendments as the final docket for consideration during the September 5, 2023 Council meeting.

During 2022 and 2023, staff compiled information on minor

TUMWATER GENERAL GOVERNMENT COMMITTEE
MINUTES OF VIRTUAL MEETING
August 9, 2023 Page 9

housekeeping amendments to the Tumwater Municipal Code (TMC) to be considered in 2023. The proposed amendments are intended as minor corrections to the City's development regulations.

TMC 18.60.025(A) establishes a process similar to the one the City follows for annual Comprehensive Plan amendments. A preliminary docket of proposed amendments is reviewed by the Planning Commission for a recommendation to City Council on the final docket.

The proposed amendments cover the following topics:

- Manufactured Home Parks Required Open Space – clarifies the requirements for open space standards for development without division of land
- Undergrounding Utilities Requirements – clarifying new and existing electrical power, telephone, cable television, fiber optics, and other transmission to be installed underground and establish an appeal process through the Transportation and Engineering Services Manager
- Town Center Mixed Use Subdistrict First Floor Uses – clarifying uses allowed on the first floor of commercial and residential developments along main streets in the Town Center Mixed Use subdistricts
- Building Heights Over Sixty-Five Feet for Specific Industrial Uses – establish a Conditional Use Permit process in the Light Industrial and Heavy Industrial zoning districts for certain uses with heights exceeding 65 feet.

Staff will review to ensure the proposed amendments are consistent with the requirements of Growth Management Act and the Tumwater Comprehensive Plan.

The Planning Commission is scheduled to receive a briefing on October 24, 2023 and conduct a work session on November 14, 2023 followed by and a public hearing on November 28, 2023.

The City Council will receive a briefing on the amendments on January 23, 2024 for consideration in February 2024.

Chair Althausen asked whether existing manufactured home parks are required to allocate 15% for open space. Manager Medrud explained that the new requirement would only apply if there was a redevelopment that exceeds the threshold or a new development of a manufactured home park. Existing uses would not be affected unless redevelopment of the property occurs beyond current thresholds.

**TUMWATER GENERAL GOVERNMENT COMMITTEE
MINUTES OF VIRTUAL MEETING
August 9, 2023 Page 10**

Councilmember Cathey inquired about the current height allowed in the City. Manager Medrud said building heights in the General Commercial cannot exceed 65 feet. The amendment applies to development within the Light Industrial or Heavy Industrial exceeding 65 feet. The project proponent would need to demonstrate why the height is necessary and obtain approval through a Conditional Use Permit process.

In response to questions about existing residential uses abutting industrial-zoned uses, Manager Medrud identified several areas of the City that include residential near industrial to include Mottman Industrial Park, the Beehive Industrial area, and in areas within the southern area of the City.

**2025 COMPREHENSIVE
PLAN PERIODIC UPDATE
– WORK PROGRAM AND
SCHEDULE:**

Manager Medrud reviewed the process for the Comprehensive Plan Update.

The work program includes an introduction of the update process and the issues to be addressed, as well as an introduction to state guidance materials. State guidance materials comprise approximately 750 pages of information that must be addressed as part of the update process. The review will be presented in smaller increments to the extent possible.

The update timeline has some flexibility based on new requirements passed by the Legislature in 2023 that are not included within any of the guidance materials. The City's schedule is based on state requirements. The goal of the update is to provide a document that is easier for the public to absorb with areas of focus contained in shorter documents.

The structure of current Comprehensive Plan Elements include:

- Capital Facilities Plan
- Conservation Element
- Economic Development Plan
- Housing Element
- Tumwater Thurston County Joint Plan (not part of update process)
- Land Use Element
- Lands for Public Purposes Element Parks, Recreation, and Open Space Plan (not part of update process)
- Shoreline Master Program (not part of update process)
- Transportation Plan
- Utilities Element
- Climate Element (required as of 2023)

TUMWATER GENERAL GOVERNMENT COMMITTEE
MINUTES OF VIRTUAL MEETING
August 9, 2023 Page 11

The plan includes a number of appendices:

- Neighborhoods
- County-Wide Planning Policies
- Sustainable Thurston Goals and Actions
- Land Use and Housing Survey Results
- Foundational Plans and Documents
- Glossary
- Ordinance No. O2016-012
- 2016 Tumwater Soil Report

Each of the elements follow a similar structures and include an introduction with background, a discussion on how each element meets the 15 growth management goals, and a discussion on how the element addresses the County-Wide Planning Policies and applicable Sustainable Thurston policies. A table of plans and foundational elements will be included.

The second chapter is a technical discussion appropriate for each element. The update will revise goals, policies, and actions. Staff proposes a separate chapter for goals, policies and actions, responsible entities, and an implementation timeline.

Chair Althaus mentioned the passage of the requirement to include climate change as an element and the previous discussion by staff and the Council to include climate change within existing elements as opposed to producing a stand-alone element. Manager Medrud said staff plans two courses of action as the new requirement requires a separate element on Climate, which will build on the work the City has completed with TRPC and other jurisdictions, as well as incorporating climate within the other elements.

The City's website includes a link to all documents related to the update. Staff is working with Communications staff to launch the Comprehensive Plan Update website. The website will include a list of all documents supporting the update, meeting minutes, and guidance materials.

New legislation requires more information on how the Capital Facilities Plan works in conjunction with the Comprehensive Plan. Staff anticipates that the next update will be a different format than in the past.

Lands for Public Purposes pertain to all City public services of solid waste, sanitary sewer, water, and fire, etc. All private utilities are addressed within the Utilities Element.

**TUMWATER GENERAL GOVERNMENT COMMITTEE
MINUTES OF VIRTUAL MEETING
August 9, 2023 Page 12**

The Department of Commerce provided the City with a substantial amount of guidance materials for the periodic update comprised of over 1,000 pages. Of the most important materials, the Guide to the Periodic Update Process helps readers to understand the general process and steps the City follows under state law to update the Comprehensive Plan. The City has been encouraged to prepare and submit a checklist to the state of completed actions. The checklist includes all issues to be addressed in the Comprehensive Plan and in the City's development regulations. The checklist does not address new legislation adopted during the 2023 legislative session. Staff plans to incorporate all new requirements within the City's checklist. The Department of Ecology provided a critical areas checklist to use for updating the development code and critical areas. Because the City has updated critical areas as changes occurred, the update will be minimal for that update process.

Other state guidance materials will be introduced during the update process and as specific elements are presented for review and discussion beginning in the fall.

Community outreach actions include scheduling some open houses and other events during the fall. Staff is working on completing a gap analysis for review by the committee in October. Staff submitted an application for a Department of Commerce grant to cover the cost of work on the Transportation Element and some technical information for the Economic Development Plan. Staff recently learned of the opportunity to apply for a Missing Middle grant of \$75,000 to fund updates to the development code.

Staff is currently in the mode of data collection and updating the format. The gap analysis covers all elements and all regulations subject to the update.

Manager Medrud outlined the review schedule for each element by the committee. He invited feedback on the process for presenting the information to the Council.

Councilmember Dahl recommended including a Council work session during a briefing on the Equity Toolbox to receive direction from the Council.

Manager Medrud reported Phase 2 beginning in 2024 is comprised of reviewing the amendments to the elements and amendments to the development code. Planning Commission reviews are occurring concurrently with the General Government Committee briefings. The legislative process will begin in fall 2024 to meet the June 2025 deadline.

**TUMWATER GENERAL GOVERNMENT COMMITTEE
MINUTES OF VIRTUAL MEETING
August 9, 2023 Page 13**

Councilmember Dahlhoff recommended incorporating more joint meeting opportunities between the Commission and the Council to enable an exchange of information and direction. Manager Medrud explained that the process begins with the Commission receiving an introduction of the elements followed by the General Government Committee receiving a review a month following the Commission's review. A joint meeting of the Commission and the Council is scheduled in December to discuss and approve the 2024 Work Program and the Comprehensive Plan Periodic Update. Other joint meetings can be scheduled on specific topics as needed.

ADJOURNMENT:

With there being no further business, Chair Althausen adjourned the meeting at 8:23 a.m.

Prepared by Valerie L. Gow, Recording Secretary/President
Puget Sound Meeting Services, psmsoly@earthlink.net

TO: General Government Committee
 FROM: Brad Medrud, Planning Manager
 DATE: September 13, 2023
 SUBJECT: 2025 Comprehensive Plan Periodic Update – Land Use

1) Recommended Action:

This is a discussion item about the current Land Use Element for the 2025 Comprehensive Plan periodic update. Please review the attached memorandum 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.

The intent of this work session is to present and discuss the current Land Use Element and update guidance for the periodic update.

3) Policy Support:

Goal LPP-1: Provide sufficient and efficient services to Tumwater and the Urban Growth Area.

Goal LU-1: Ensure the Land Use Element is implementable and coordinated with all applicable City plans and the plans of other jurisdictions in the Thurston region.

4) Alternatives:

☐ None.

5) Fiscal Notes:

This is primarily an internally funded work program task. The City has filed an application for a Washington State Department of Commerce grant funding to support the periodic

update of \$125,000 and is preparing two Washington State Department of Commerce grant applications for funding to support addressing the new state missing middle housing requirements and the development of a Climate Element.

6) Attachments:

- A. Staff Report
- B. Presentation
- C. Land Use Element, Amended 2021
- D. Land Use Element, Citywide Land Use Map, Amended 2021
- E. Land Use Element, Neighborhoods Use Map, Amended 2019
- F. Land Use Element, Appendix F Glossary, 2016
- G. Commerce Urban Growth Area Guidebook 2012

STAFF REPORT

Date: September 13, 2023
To: General Government
From: Brad Medrud, Planning Manager



2025 Comprehensive Plan Update – Land Use 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 required to complete work on the periodic update by June 30, 2025. Work on the periodic update started last fall.

The intent of the General Government meeting on Wednesday, September 13, 2023, is to start the review of the Land Use Element by discussing the state requirements and introducing the current version of the Element.

Contents

Growth Management Act Goals 2

General State Requirements for Land Use Elements 6

Current Land Use Element 6

 1. Background 6

 2. Structure 8

 3. Link to Current Land Use Element 10

Phase 1 – Community Engagement (Summer 2023 – Fall 2023)..... 10

 1. Gap Analysis 10

 2. Data Collection 12

 3. Schedule..... 12

 4. Specific Topics Addressed as Part of the Update 13

Phase 2 – Plan Development (Winter 2024 – Fall 2024) 18

 1. Community Outreach..... 18

 2. Schedule..... 18

Phase 3 – Legislative Process (Fall 2024 – June 30, 2025)..... 19

1. Community Outreach.....	19
2. Schedule.....	19
Appendix A – Guidance	21
Appendix B – Current Land Use Goals, Policies, and Actions	22

Growth Management Act Goals

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. They are not listed in order of priority.

The following is a summary of how the updated Land Use Element will need to meet each of the fifteen goals. In many cases, the goals have been updated by the state legislature since the 2016 Comprehensive Plan update.

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

The availability of services, including roads, water and sewer facilities, and other utilities will need to be considered when applying all land use designations in the Land Use Element. The density ranges for all residential land use designations will need to be consistent with available or planned public facilities and services.

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

The Land Use Element will contain goals, policies, and actions that encourage compact, efficient urban development and encourage urban growth to be phased outward from the urban core. The goals, policies, and actions of the current Land Use Element are found in Appendix B of this staff report. These policies will include minimum density requirements, clustering in sensitive areas, overall higher residential densities throughout the City, and mixed residential and commercial areas. Each residential designation in the Land Use Element will need to provide adequate density for feasible transportation, water, and sanitary sewer service, while protecting sensitive areas.

- 3. **Transportation.** *Encourage efficient multimodal transportation systems that will reduce greenhouse gas emissions and per capita vehicle miles traveled, and are based on regional priorities and coordinated with county and city comprehensive plans. [Updated in 2023]*

The Land Use Element will contain goals, policies, and actions that ensure coordination with regional and local transportation plans. The Transportation goal was updated in 2023 by the state legislature to add reducing greenhouse gas emissions and per capita

vehicle miles traveled. Achieving this goal will be done through a combination of goals, policies, and actions in the Land Use Element and Transportation Plan. The Land Use Element will also propose residential, mixed-use, and neighborhood commercial land use designations that will encourage multi-modal, transit oriented development.

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.* [Updated in 2022]

How affordable housing will be accommodated for all economic classes is a new state requirement from 2023 and will be more specifically set forth in the Housing Element of the Comprehensive Plan. The Land Use Element plays a role in allocating 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 land use designation, will provide a variety of housing types at varying densities. Each Neighborhood subarea of the Land Use Element will also need to contain sufficient variability in housing types to ensure that 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.

5. **Economic development.** *Encourage economic development throughout the state that is consistent with adopted comprehensive plans, promote economic opportunity for all citizens of this state, especially for unemployed and for disadvantaged persons, promote the retention and expansion of existing businesses and recruitment of new businesses, recognize regional differences impacting economic development opportunities, and encourage growth in areas experiencing insufficient economic growth, all within the capacities of the state's natural resources, public services, and public facilities.* [Updated since 2016]

The Land Use Element will ensure the provision of adequate land for commerce and industry in the City. The Economic Development Plan, last updated in 2019, makes specific recommendations for economic development in the City and will be updated as part of 2025 Comprehensive Plan update.

6. **Property rights.** *Private property shall not be taken for public use without just compensation having been made. The property rights of landowners shall be protected from arbitrary and discriminatory actions.*

The Attorney General is directed under RCW 36.70A.370 to advise state agencies and local governments on an orderly, consistent process that better enables the government to evaluate proposed regulatory or administrative actions to assure that these actions do not result in unconstitutional takings of private property. Local governments that plan under the Growth Management Act must use this process. The City adheres to the Attorney General's *Advisory Memorandum and Recommended Process for Evaluating Proposed Regulatory or Administrative Actions to Avoid Unconstitutional Takings of Private Property*, which was developed to provide local governments with a tool to assist them in the process of evaluating land use actions.

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

The Land Use Element provides the policy basis for the City's development regulations to be developed in a systematic, fair manner. All jurisdictions fully planning under the Growth Management Act must use all the permit procedures found in Chapter 36.70B RCW *Local Project Review* to administer permit application processes. Project permit processing standards are provided in Tumwater Municipal Code (TMC) Title 14 *Development Code Administration*. These standards will be amended as part of the update to reflect changes in state law in 2023.

8. **Natural resource industries.** *Maintain and enhance natural resource-based industries, including productive timber, agricultural, and fisheries industries. Encourage the conservation of productive forestlands and productive agricultural lands, and discourage incompatible uses.*

The Land Use Element will need to ensure the viability of natural resource industries in the City through the identification of such lands in the Land Use Element text and maps. Additionally, the Conservation Element has specific guidelines and policies that ensure the viability of natural resource industries and activities.

9. **Open space and recreation.** *Retain open space and green space, enhance recreational opportunities, enhance fish and wildlife habitat, increase access to natural resource lands and water, and develop parks and recreation facilities. [Updated in 2023]*

The state legislature updated this goal in 2023 to add the requirement to retain green space and enhance habitat. The Land Use Element, in conjunction with the Parks, Recreation, and Open Space Plan, will need to designate areas of the City that would be appropriate for future open space and recreation uses. The Land Use Element reinforces the recommendations of the Parks, Recreation, and Open Space Plan through land use designations and in the goals and policies.

10. **Environment.** *Protect and enhance the environment and enhance the state's high quality of life, including air and water quality, and the availability of water. [Updated in 2023]*

The state legislature updated this goal in 2023 to add the requirement to enhance the environment. Each designation in the Land Use Element will need to be of an appropriate intensity for where it is applied. Areas of environmental sensitivity will need to be designated as open space or a lower intensity designation than other areas of the City. The Conservation Element will need to contain specific policies relating to air and water quality, water availability, and protection and preservation of critical areas. The Land Use Element also makes recommendations for clustering and other creative development techniques in sensitive areas of the City. It is expected that elements from the Urban Forestry Management Plan will be brought into this element.

11. **Citizen participation and coordination.** *Encourage the involvement of citizens in the planning process, including the participation of vulnerable populations and*

overburdened communities, and ensure coordination between communities and jurisdictions to reconcile conflicts. [Updated in 2023]

The state legislature updated this goal in 2023 to add the requirement to include the participation of vulnerable populations and overburdened communities. For the Comprehensive Plan update, the City will be following the strategy outlined in the Final Community Engagement Plan (July 2023).

- 12. Public facilities and services.** *Ensure that those public facilities and services necessary to support development shall be adequate to serve the development at the time the development is available for occupancy and use without decreasing current service levels below locally established minimum standards.*

All non-open space designations in the Land Use Element will need to be applied to areas that either have adequate capacity for transportation, utilities, storm, and municipal services or they will be provided with these facilities in the future concurrent with development. The Land Use Element will ensure concurrency through coordination with the Capital Facilities Element, Transportation Element and other elements of the Comprehensive Plan.

- 13. Historic preservation.** *Identify and encourage the preservation of lands, sites, and structures that have historical or archaeological significance.*

The Land Use Element designates an area of the City as the New Market Historic District. The New Market Historic District Master Plan was adopted by the City Council in November of 1993. The Master Plan provides a framework for action and it will ensure the preservation of historic and archeological resources in the Historic District.

- 14. Climate change and resiliency.** *Ensure that comprehensive plans, development regulations, and regional policies, plans, and strategies under RCW 36.70A.210 and chapter 47.80 RCW adapt to and mitigate the effects of a changing climate; support reductions in greenhouse gas emissions and per capita vehicle miles traveled; prepare for climate impact scenarios; foster resiliency to climate impacts and natural hazards; protect and enhance environmental, economic, and human health and safety; and advance environmental justice. [Added in 2023]*

The Land Use Element will need to address this is a new goal in coordination with the new Climate Element.

- 15. Shorelines of the state.** *For shorelines of the state, the goals and policies of the shoreline management act as set forth in RCW 90.58.020 shall be considered an element of the county's or city's comprehensive plan. [Updated in 2023]*

The Shoreline Master Program was adopted in 2012 and updated in 2018. The Shoreline Master Program addresses land uses on all lands under the jurisdiction of the Shoreline Management Act in order to protect and preserve fish and wildlife habitat and the shorelines of the state.

General State Requirements for Land Use Elements

In addition to meeting the fifteen state Growth Management Act goals, the City's Land Use Element will need to address the following Growth Management Act requirements according to RCW 36.70A.070, as amended in 2023:

1. Designate the proposed general distribution and general location and extent of the uses of land, where appropriate, for agriculture, timber production, housing, commerce, industry, recreation, open spaces and green spaces, urban and community forests within the urban growth area, general aviation airports, public utilities, public facilities, and other land uses.
2. Include population densities, building intensities, and estimates of future population growth.
3. Provide for protection of the quality and quantity of groundwater used for public water supplies.
4. Give special consideration to achieving environmental justice in its goals and policies, including efforts to avoid creating or worsening environmental health disparities.
5. Consider utilizing urban planning approaches that promote physical activity and reduce per capita vehicle miles traveled within the jurisdiction, but without increasing greenhouse gas emissions elsewhere in the state.
6. Review drainage, flooding, and stormwater runoff in the area and nearby jurisdictions and provide guidance for corrective actions to mitigate or cleanse those discharges that pollute waters of the state, including Puget Sound or waters entering Puget Sound.
7. Reduce and mitigate the risk to lives and property posed by wildfires by using land use planning tools, which may include, but are not limited to:
 - a. Adoption of portions or all of the wildland urban interface code developed by the international code council or developing building and maintenance standards consistent with the Firewise USA program or similar program designed to reduce wildfire risk;
 - b. Reduce wildfire risks to residential development in high risk areas and the wildland urban interface area, separating human development from wildfire prone landscapes; and
 - c. Protect existing residential development and infrastructure through community wildfire preparedness and fire adaptation measures.

Current Land Use Element

1. Background

The Land Use Element of the 2016 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 Land Use Element of the Comprehensive Plan was last fully updated in 2016 and amended in 2021.

The 2016 Land Use Element covered the 20-year planning period from 2015 to 2035, and designated the proposed general distribution, location, and extent of housing, commerce, industry, recreation, open spaces, the general aviation airport, public utilities, public facilities, agricultural land, mineral resource land, and transportation as it relates to land use. It also incorporated urban planning approaches that promote sustainable, compact community development that is livable, walkable, safe, sustainable, and economically vibrant. The Land Use Element included population densities, building intensities, and estimates of future population growth.

Along with the Conservation and Lands for Public Purposes Elements, the 2016 Land Use Element also provided for protection of the quality and quantity of groundwater used for public water supplies. Through adoption of the Hazard Mitigation Plan, the Land Use Element, along with the Conservation and Lands for Public Purposes Elements, reviewed drainage, flooding, and storm water run-off in the area and provided guidance for corrective actions to mitigate or cleanse those discharges that pollute waters of the state, including Puget Sound or waters entering Puget Sound.

Areas that are within City's Urban Growth Area are addressed through the Tumwater and Thurston County Joint Plan in accordance with adopted County-Wide Planning Policies. The Joint Plan was last updated by the City and County in 2021.

The Land Use Maps represent the general future land use patterns intended for the City within the 20-year planning period of the Comprehensive Plan. They are a graphic expression of the policies found in Chapter 3 *Land Use Goals, Policies, and Actions* and in each neighborhood chapter in the Neighborhood Appendix. The goals, policies, and actions of the current Land Use Element are found in Appendix B of this staff report.

The 2016 Land Use Element divided the City into eleven neighborhood areas recognizing different land use planning needs. The Neighborhood Appendix consisted of an outline, a map, and text referencing each area on the map. The text contained a description of current land use, trends for each neighborhood, and set forth policy recommendations for future land use. The Neighborhood Appendix provided a quick reference that includes policy recommendations for particular areas in each neighborhood.

Specific information on policy recommendations for each land use designation is found in Chapter 2 *Designations, and Definitions*. The neighborhood maps graphically represent policy recommendations for future land uses for each neighborhood in the City for the Comprehensive Plan's 20-year planning period.

The 2016 Land Use Element contained the following Vision and Mission statements, which provided overarching direction for the future of the City. These statements were developed through the City's Strategic Planning Process.

Vision Statement: *Tumwater of the future will be people-oriented and highly livable, with a strong economy, dynamic places, vibrant neighborhoods, a healthy natural environment, diverse and engaged residents, and a living connection to its history.*

Mission Statement: *In active partnership with its citizens, the City of Tumwater provides leadership and essential municipal services to cultivate a prosperous economy, a healthy natural environment, vibrant neighborhoods, and a supportive social fabric.*

2. Structure

The current Land Use Element consists of the following parts:

1. Introduction

- 1.1 Purpose and Scope, including Table of Foundational Plans and Documents
- 1.2 Vision and Mission Statements
- 1.3 Strategic Plan Goals
- 1.4 Growth Management Act Goals Compliance
- 1.5 County-Wide Planning Policy Compliance
- 1.6 Sustainable Thurston Goals
- 1.7 Ongoing Review Program
- 1.8 Amendments, Public Participation, and Intergovernmental Coordination
- 1.9 Overall Comprehensive Plan Connections
- 1.10 Tumwater Community Profile
- 1.11 Tumwater Land Use Patterns
- 1.12 Existing Land Use Distribution
- 1.13 Land Use Distribution

2. Designations and Definitions

- 2.1 Introduction
 - 2.1.1 City-Wide Future Land Use Map
- 2.2 Residential Uses
 - 2.2.1 Residential/Sensitive Resource (2-4 Dwelling Units/Acre)
 - 2.2.2 Single Family Low Density (4-7 Dwelling Units/Acre)
 - 2.2.3 Single Family Medium Density (6-9 Dwelling Units/Acre)
 - 2.2.4 Multi-Family Medium Density (9-15 Dwelling Units/Acre)

- 2.2.5 Multi-Family High Density (14-29 Dwelling Units/Acre)
- 2.2.6 Manufactured Home Park (6-9 Dwelling Units/Acre)
- 2.3 Mixed Use (Residential Minimum 14 Dwelling Units/Acre)
- 2.4 Neighborhood Commercial
- 2.5 New Market Historic District
- 2.6 General Commercial
- 2.7 Capitol Boulevard Community
- 2.8 Brewery District
- 2.9 Light Industrial
- 2.10 Airport Related Industrial
- 2.11 Heavy Industrial
- 2.12 Utilities
- 2.13 Public and Institutional
- 2.14 Parks and Open Space
- 2.15 Tumwater Town Center
- 2.16 Design Review
- 2.17 Maximum and Minimum Densities
- 2.18 Clustering
- 2.19 Modular and Manufactured Housing
- 2.20 Innovative Housing and Urban Planning Approaches Promoting Physical Activity
- 3. Land Use Goals, Policies, and Actions
 - 3.1 Introduction
 - 3.2 Goals, Policies, and Actions
 - 3.3 Implementation Policies
- 4. Land Supply Analysis
 - 4.1 Introduction
 - 4.2 Partially Used and Under Utilized Land Supply Analysis
 - 4.3 Developable or Re-developable Land Supply Analysis
 - 4.4 Analysis of Population Accommodation

- Appendices
 - A. Neighborhoods
 - B. County-Wide Planning Policies
 - C. Sustainable Thurston Goals and Actions
 - D. Land Use and Housing Survey Results
 - E. List of Foundational Plans and Documents
 - F. Glossary
 - G. Ordinance No. O2016-012
 - H. 2016 Tumwater Soil Report
- Land Use Maps
 - A. City-Wide Future Land Use Map
 - B. Neighborhood Maps
- Subarea Plans
 - A. Brewery District Plan
 - B. Capitol Boulevard Corridor Plan
 - C. Littlerock Road Subarea Plan

3. Link to Current Land Use Element

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

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

Staff is reviewing the visions, goals, and policies in the existing Land Use 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

- Started July 2023, finish September 2023
- Process being followed:

1. Use the following materials to review the Land Use Element:
 - 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)
 - Commerce Periodic Update Materials
 - *Climate Element Planning Guidance* (Commerce, July 2023)
 - *Quick Guide to Washington State Agencies* (Commerce, 2023)
 - *Washington Plan Integration Resource Guide* (FEMA/Commerce, July 2020)
 - *Growth Management Act Amendments 1995-2023* (Commerce, 2023)
 - 2022-23 State Legislation
 - Annexations (2SHB 1425)
 - Clean Energy Siting (ESHB 1173/E2SHB 1216)
 - Climate (E2SHB 1170/E2SHB 1181)
 - Impact Fees for Construction of Smaller Residential Units (SB 5258)
 - Organic Materials Management (E2SHB 1799)
 - Project Permit Review (2SSB 5290)
 - SEPA (SSB 5818/2SSB 5412)
 - Tribal Participation (HB 1717)
 - Urban Growth Area Land Swaps (Coordination with Thurston County is Required/SB 5593)
 - Plans Adopted by the City since 2016
 - NPDES Stormwater Permit Update
 - Thurston Climate Mitigation Plan
 - Tumwater Housing Action Plan
 - Urban Forestry Management 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

- Maps
- Appendices
- Subarea Plans

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
- Transportation Data – Consultant derived once Commerce grant applied for, awarded, and contract and work completed – 2024
- Economic Data – Consultant derived once Commerce grant applied for, awarded, and contract and work completed – 2024
- Mapping – Schedule time to meet and discuss with GIS Team – September 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 Work Session
 - October 24, 2023

- Joint City Council – Planning Commission Meeting
 - December 12, 2023
- Initial Land Use Element Meetings – Goals, Policies, and Actions
 1. Includes Appendices, Maps, and Subarea Plans
 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. Land Use Element
- Update the following:
 - Tumwater Community Profile from Thurston Regional Planning Council.
 - 20-year population projection for the City and its urban growth area throughout the Plan, which should be consistent with Thurston County’s sub-county allocation of that forecast and housing needs.
 - Estimates of population densities and building intensities based on future land uses and housing needs.
 - City land use patterns and distribution information.

- City-Wide Future Land Use Map.
- Buildable Lands:
 - Existing land use and existing residential density charts.
 - Commercial/industrial vacant land supply analysis.
 - Net buildable industrial land table.
 - Total dwelling units buildout table.
 - Address current and future Habitat Conservation Plan conservation areas.
- Strategic Priorities – City Council
- Update Land Use Maps
- Review and Update Subarea Plans
 - At the City Council's direction on March 1, 2022, review of the Littlerock Subarea Plan area and revisions to mixed use land designation citywide.
 - Update Littlerock Road Subarea Plan to address land use changes since adoption.
 - Update Black Hills Subarea Transportation Plan to address land use changes since adoption.
 - Update Brewery District and Capitol Boulevard Corridor Plan as needed.
- Update Neighborhood Appendix to incorporate current information describing existing development patterns.
- Specific Topics
 - Airport
 - Update policies, land use designations, and zoning to discourage the siting of incompatible uses adjacent to the Olympia Regional Airport.
 - The Plan and associated regulations must be filed with the State Department of Transportation for review.
 - Clean Energy Transformation Act
 - Ensure there are no conflicts
 - Definitions
 - New definitions (E2SHB 1181)
 - Essential Public Facilities (From 2022 Comprehensive Plan Amendments)
 - Shorten, remove regulations in Element

- Clean energy and treatment program facilities amendments to essential public facilities per E2SSB 5536
- Forest or Agricultural Lands of Long-Term Commercial Significance
 - If forest or agricultural lands of long-term commercial significance are designated inside City, update the program authorizing transfer or purchase of development rights in coordination with the County.
- Green Spaces and Urban Forests
 - Designate greenspaces and urban forests (E2SHB 1181)
- Growth Management Goals
 - Address new Growth Management Goals (E2SHB 1181)
- Habitat Conservation Plan
 - Remove existing conservation lands from land capacity
 - Policy for removing new conservation lands from land capacity
 - Change the land use designation and zone district of existing conservation lands to OS Open Space or GB Green Belt
- Manufactured Home Parks
 - MHP Manufacture Home Park land use designation and zone district expansion
- Missing Middle
 - Two housing units allowed on every lot, independent of allowed densities.
 - Need to determine how densities will work in this situation now.
 - Does this mean “lots per acre” is the measure?
 - See guidance for how this will work with accessory dwelling units requirements
- Mixed Use/Neighborhood Commercial
 - Review the “neighborhood center” concept.
 - Look at 88th and Old Highway 99 as a mixed use center, as it has General Commercial and Mixed Use land use designations.
 - Look at 79th and Old Highway 99 as the area is currently designated Light Industrial but the informal Warehouse District functions as a General Commercial and Light Industrial land use designation hybrid.
- Natural Hazard Mitigation

- Incorporate provisions of the updated 2023 Hazard Mitigation Plan as appropriate.
- Adopt Natural Hazard Mitigation Plan that addresses entire subelement by reference (E2SHB 1181)
- May be eligible to request a timeline extension of 48 months to update a FEMA Natural Hazard Mitigation Plan (E2SHB 1181)
- Permanently Affordable Housing
 - Address actions from the Housing Action Plan
- Physical Activity
 - Consider utilizing urban planning approaches that promote physical activity.
- Residential Densities
 - Update minimum and maximum residential densities
 - Review 2020 Comprehensive Plan Amendment residential up zone criteria and apply to 2025 Update
- Schools
 - Review land use designations and zone districts for schools.
- Single Family and Multifamily Land Use Designations
 - Replace single family and multifamily land use designations with a range of residential intensities (R1, R2, R3, etc.) in text and maps
- Transfer of Development Rights
 - Remove transfer of development rights requirement for maximum densities in residential land use designations.
 - Example SFL would become 4 minimum, 7 maximum with needing a TDR (Tumwater Housing Action Plan)
 - Coordinate with County
- Tree Canopy
 - Canopy coverage evaluation (E2SHB 1181)
- Urban Growth Area
 - Coordinate with Thurston County on new 2021-2022 legislation regarding urban growth area size, patterns of development, suitability, and infrastructure.
- Vehicle Miles traveled

- Consider approaches to reduce per capita vehicle miles travel (E2SHB 1181)
- Wildfires
 - Reduce and mitigate the risk of wildfires (E2SHB 1181)

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

Feedback gathered through the community outreach process will be incorporated into the draft Land Use 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
- Land Use Element Development Meetings
 1. Includes Appendices, Maps, and Subarea Plans
 2. Planning Commission Work Sessions
 - February 27, 2024
 - April 9, 2024
 - September 10, 2024
 3. General Government Committee Briefings
 - April 10, 2024
 - October 9, 2024
- 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 work sessions 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 work sessions 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

- Commerce Review
 - Fall 2024 – Winter 2025
- Prepare Comprehensive Plan Update Ordinance
 - October 2024
- SEPA Review
 - November 2024 – December 2024
 - Commerce Notice of Intent
 - November 2024 - December 2024
- Public Adoption Meetings
 1. Planning Commission
 - Briefing
 - November 26, 2024
 - Work Session

- 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 Work Session
 - 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 Commerce
 - 2. June 30, 2025

Appendix A – Guidance

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

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

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

In addition, the Puget Sound Regional Council is conducting 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

Municipal Research Services Center has a Comprehensive Planning webpage.

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

Appendix B – Current Land Use Goals, Policies, and Actions

3.1 Introduction

This chapter of the Land Use Element specifies goals, policies, and actions meant to set forth a direction for the future growth of Tumwater 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. Finally, the action items implement certain recommendations within the Land Use Element. The goals, policies, and actions should be looked at in conjunction with Chapter 2, Designations, and Definitions. The two chapters are meant to work together as a whole.

3.2 Goals, Policies, and Actions

GOAL LU-1: Ensure the Land Use Element is implementable and coordinated with all applicable City plans and the plans of other jurisdictions in the Thurston region.

<u>Policy</u>	<u>Action</u>
LU-1.1	Ensure the Land Use Element is consistent with adopted County-Wide Planning Policies and integrate transportation considerations into land use decisions, and vice versa.
	LU-1.1.1 Implement the eleven County-Wide Policy elements in the County-Wide Policy Plan (Reference Appendix B: County-Wide Planning Policies).
LU-1.2	Ensure the Land Use Element is consistent with the goals of Sustainable Thurston.
	LU 1.2.1 Implement specific Sustainable Thurston goals identified in Land Use Element Section 1.6, Sustainable Thurston Goals (Reference Appendix C: Sustainable Thurston)
LU-1.3	Engage in planning on a neighborhood level with residents of the City (Reference Appendix A: Neighborhood Appendix)
LU-1.4	Encourage the creation of a new city center that is compatible with the Land Use Element.
LU-1.5	Coordinate the Land Use Element with the Port of Olympia Master Plan (2016).
LU-1.6	Ensure consistency between the Land Use Element and Tumwater Historic District Master Plan.
LU-1.7	Coordinate the Land Use Element with the Shoreline Master Program.
	LU-1.7.1 Make sure the Land Use Element is consistent with the recommendations of the Shoreline Master Program.
LU-1.8	Coordinate the Land Use Element with the City's Economic Development Element.
	LU-1.8.1 Implement goals and associated policies and actions of the Economic Development Element.
LU-1.9	Ensure consistency between the Land Use Element and the Tumwater Zoning Code.

- LU-1.9.1 Implement the Land Use Element by revising the Zoning Code and other municipal Codes to reflect the goals, policies, actions, and designations outlined in the Land Use Element.
- LU-1.10 Coordinate the Land Use Element with the City's Lands for Public Purposes Element and the Capital Facilities Plan.
 - LU-1.10.1 Implement low impact development through land use and stormwater planning.
- LU-1.11 Make capital budget decisions consistent with the comprehensive plan in accordance with RCW 36.70A.120 (Reference the City's current six-year Capital Facilities and Transportation Improvement Plans).
- LU-1.12 Coordinate the Land Use Element with local, state, and national initiatives that support the City's vision whenever practical to increase the chance of additional funding.
- LU-1.13 Coordinate the Land Use Element with the strategies in the City of Tumwater Housing Action Plan.
- LU-1.14 Coordinate the Land Use Element with the strategies in the most recent version of the Thurston Climate Mitigation Plan.

GOAL LU-2: Ensure development takes place in an orderly and cost-efficient manner in order to best utilize available land and public services, conserve natural resources, protect critical areas, preserve open space, and reduce sprawl.

<u>Policy</u>	<u>Action</u>
LU-2.1	Encourage the highest intensity growth to locate within the City's corporate limits. <ul style="list-style-type: none">LU-2.1.1 Implement goals and associated policies and actions of the Economic Development Element. (Reference Goal LU-1.8.1)
LU-2.2	Reduce inappropriate conversion of undeveloped land into sprawling low-density development. <ul style="list-style-type: none">LU-2.2.1 Ensure the eleven County-Wide Policy elements in the County-Wide Policy Plan are implemented. (Reference Goal LU-1.1.1)
LU-2.3	Encourage innovative land use management techniques such as density bonuses, cluster housing, zero-lot-line development, planned unit developments, and transfer of development rights to create vibrant centers, corridors, and neighborhoods while accommodating growth. <ul style="list-style-type: none">LU-2.3.1 Consider revision of the City's Development Standards to encourage innovative land use management techniques.
LU-2.4	Ensure new annexations adhere to the goals and policies of the City's Annexation Policy.

- LU-2.5 Encourage development of architectural and landscape design standards.
- LU-2.5.1 Implement Goals 5 and 6 of the Economic Development Element.
- LU-2.6 Ensure the City's capital budget decisions in the City's current six-year Capital Facilities and Transportation Improvement Plans are coordinated with the Land Use Element, Lands for Public Purpose Element, and Transportation Element.
- LU-2.7 Create vibrant city centers and activity nodes along transit corridors that support active transportation and housing, jobs, and services.
- LU-2.8 Create safe and vibrant neighborhoods with places that build community and encourage active transportation.
- LU-2.9 Protect designated mineral resource lands from incompatible development.
- LU-2.10 Reduce the City's carbon footprint where possible and move towards a carbon-neutral community.

GOAL LU-3: Ensure adequate public services, facilities, and publicly owned utilities are available to proposed and existing development.

Policy Action

- LU-3.1 Coordinate development with the City's six-year Capital Facilities Plan.
- LU-3.1.1 Ensure the Capital Facilities Plan can be implemented through the Land Use Element's projected densities and the direction found in the Lands for Public Purposes Element.
- LU-3.2 Ensure development is in conformance with the Water System Plan and Sanitary Sewer Comprehensive Plan.
- LU-3.3 Analyze all proposed development for anticipated impact on services, either as an element of site plan review or as part of an environmental impact assessment.
- LU-3.4 Give preference to providing adequate public facilities to settled areas rather than extending new services to sparsely settled or undeveloped areas and to serving incorporated land before serving unincorporated areas.
- LU-3.4.1 Ensure the eleven County-Wide Policy elements in the County-Wide Policy Plan are implemented. (Reference Goal LU-1.1.1)
- LU-3.5 Work with developers to determine where and when new public facilities are to be placed to permit proper development of commercial and residential projects. This process should be directly related to the Lands for Public Purposes Element, the Capital Facilities Plan, and site plan review in order to achieve concurrency.
- LU-3.5.1 Ensure the eleven County-Wide Policy elements in the County-Wide Policy Plan are implemented. (Reference Goal LU-1.1.1)

LU-3.6 Require residential and commercial development utilizing septic tanks for sewerage disposal to hook up to sanitary sewer when the system fails, needs replacement, or requires major repairs when sanitary sewer laterals are readily available.

LU-3.6-1 In consultation with the LOTT partners, develop a program to connect developments that are on septic systems to LOTT's sewerage treatment system to reduce impacts to groundwater and surface water quality.

LU-3.7 Require residential and commercial development utilizing private wells for water systems to connect to City water service when the well fails, needs replacement, or requires major repairs, where City water service available

GOAL LU-4: Encourage land use patterns that increase the availability of affordable housing for all economic segments of the Tumwater population.

Policy Action

LU-4.1 Coordinate the Land Use Element with the Housing Element and fully implement the goals, policies, and actions of the Housing Element.

LU-4.2 Encourage innovative techniques for providing affordable housing resulting in an attractive product that will be an asset to the Tumwater community.

LU-4.2.1 Consider revision of the City's Development Standards to encourage innovative land use management techniques. (Reference Goal LU-2.3.1)

LU-4.3 Continue to allow manufactured housing on individual lots within the City, as well as within mobile and manufactured home parks, to encourage affordable housing.

LU-4.3.1 Consider methods to provide sufficient land for manufactured housing in accordance with the Growth Management Act.

LU-4.4 Permit implementing regulations to experiment in new forms of residential development where amenities of open space, privacy, and visual quality can be maintained or improved, and flexible solutions to land use problems such as density, diversity, equitability, and affordability can be achieved.

LU-4.4.1 Consider revision of the City's Development Standards to encourage innovative land use management techniques. (Reference Goal LU-2.3.1)

LU-4.5 Encourage higher density residential uses in order to provide affordable housing. These uses should blend with the existing character of the community.

LU-4.6 Increase housing types and densities in corridors and centers to meet the needs of a changing population.

LU-4.7 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 LU-5: Ensure development patterns encourage efficient multi-modal transportation systems coordinated with regional, City, and county transportation plans.

Policy Action

- LU-5.1 Ensure coordination with the Transportation Element.
- LU-5.2 Ensure coordination with the Thurston Regional Transportation Plan.
 - LU-5.2.1 Ensure the eleven County-Wide Policy elements in the County-Wide Policy Plan are implemented. (Reference Goal LU-1.1.1)
- LU-5.3 Ensure coordination with the Parks, Recreation, and Open Space Plan (Element).
- LU-5.4 Established pedestrian and bicycle trail links with various parts of Tumwater and within the business area.
 - LU-5.4.1 Ensure coordination of the Land Use Element with the Parks, Recreation, and Open Space Plan (Element) and the Transportation Element.
- LU-5.5 Encourage provision of urban plazas and access to transit stops when new construction or major renovation is proposed. Incentives for providing such amenities should be sought.
 - LU-5.5.1 Consider revision of the City's Development Standards to encourage provision of these amenities. Consider development of a citywide design standards program. (Reference Goal LU-2.3.1)
- LU-5.6 Allow densities and mixes of uses that reduce the number and lengths of vehicle trips and increase the opportunity to use public transit and non-motorized modes of travel.
- LU-5.7 Reinforce the link between land use and public transportation by encouraging development to occur at urban residential densities along designated transit corridors, nodes, and near commercial centers.
- LU-5.8 Ensure proposed capacity improvements to the City's transportation systems are designed to serve proposals that are contiguous to existing development, as a means to discourage the occurrence of "leap frog" development patterns.
- LU-5.9 Provide development incentives, such as increased density, increased square footage, or increased height for proposed land developments located adjacent to transportation corridors when amenities for transit users, bicyclists, and pedestrians are included.
- LU-5.10 Encourage land development proposals to utilize the capacity of the existing transportation system, especially transit and non-motorized modes.
- LU-5.11 Encourage public and private development proposals to enhance the street side environment to maximize comfort for the transit user and the pedestrian.
- LU-5.12 Encourage subdivision and commercial and retail project design that facilitates cost-effective transit and emergency service delivery.

- LU-5.13 Discourage transportation improvements, regardless of their financing mechanisms that would trigger premature development; that is, development inconsistent with applicable comprehensive plans and zoning.
- LU-5.14 Ensure alternative transportation modes are included in comprehensive plans, subdivisions, and other land developments.
- LU-5.15 Expand bicycle and pedestrian data collection efforts.
- LU-5.16 Establish a regional bicyclist and pedestrian advisory body.
- LU-5.17 Support efforts of the local traffic safety campaigns to educate bicyclists and pedestrians of the laws pertaining to walking and biking.

GOAL LU-6: Reduce impacts from flooding; encourage efficient stormwater management; and ensure the groundwater of Tumwater is protected and preserved.

Policy Action

- LU-6.1 Ensure new development is in conformance with requirements and standards of the Northern Thurston Groundwater Protection Plan.
- LU-6.2 Ensure new development is in conformance with requirements and standards of the Drainage Design and Erosion Control Manual for Tumwater, as amended.
 - LU 6.2.1 Implement specific Sustainable Thurston goals identified in Land Use Element Section 1.6, Sustainable Thurston Goals (Reference Appendix C: Sustainable Thurston)
- LU-6.3 Ensure coordination with the Percival Creek Comprehensive Drainage Basin Plan.
- LU-6.4 Ensure new development is in conformance with aquifer protection standards of the Conservation Element.
- LU-6.5 Ensure implementation of the Natural Hazards Mitigation Plan for the Thurston Region to reduce or eliminate the human and economic costs of natural disasters for the overall good and welfare of the community.
- LU-6.6 Ensure coordination with the Salmon Creek Comprehensive Drainage Basin Plan.
 - LU-6.6.1 Incorporate the development review process within the Salmon Creek Comprehensive Drainage Basin Plan into the Tumwater Municipal Code.

GOAL LU-7: Encourage retention of open space, parks, trails, and development of recreational opportunities within Tumwater.

Policy Action

- LU-7.1 Ensure coordination of the Land Use Element with the Parks, Recreation, and Open Space Plan (Element).

- LU-7.2 Ensure coordination of the Land Use Element with open space retention and natural area preservation standards of the Conservation Element.
- LU-7.3 Preserve environmentally sensitive lands, farmlands, mineral resources, and prairies, by developing compact urban areas.
- LU-7.4 Provide a variety of open spaces including landscaped buffers, small parks, plazas, and other community areas to balance higher density development and enhance quality of living.
 - LU-7.4.1 Specify the amount of area that must be dedicated for open space and require configuration useful for the purpose desired in the City's Zoning Ordinance to make certain that areas of developments dedicated to open space provide the functions intended.

GOAL LU-8: Ensure physical limitations of the land are observed during the development process.

Policy Action

- LU-8.1 Ensure new development is in conformance with standards and requirements for critical areas within the Conservation Element.
 - LU-8.1.1 Consider implementation of the state geological study and mapping program for the City. This study should address geologic, erosion, landslide, seismic, and volcanic hazard areas.
- LU-8.2 Reserve the right to prohibit or set conditions on development based on anticipated adverse environmental impact.
- LU-8.3 Ensure development within the jurisdiction of the Shoreline Management Act adheres to the flood control policies, land use controls, and regulations of the applicable environmental designation as described in the Tumwater Shoreline Master Program.
- LU-8.4 Ensure new development is in conformance with the standards of the City's Protection of Trees and Vegetation Ordinance.

GOAL LU-9: Identify what conditions should be applied to development in residential areas.

Policy Action

- LU-9.1 Protect residential developments from excessive noise, odors, dirt, glare, and other nuisances emanating from commercial and industrial uses.
- LU-9.2 Allow for multi-family residential development in the zoning code. Consideration should be given to encouraging this type of development near centers of community services.

- LU-9.2.1 Consider revision of the City's Development Standards to encourage innovative land use management techniques. (Reference Goal LU-2.3.1)
- LU-9.3 Integrate design features of existing natural systems into the layout and siting of new residential dwelling units. Preserve trees and significant ecological systems, whenever possible and practical.
 - LU-9.3.1 Consider revision of the City's Development Standards to encourage innovative land use management techniques. (Reference Goal LU-2.3.1)
- LU-9.4 Permit experimentation in development regulations with newer forms of residential development where amenities of open space, privacy, and visual quality can be maintained or improved, and flexible solutions to land use problems can be achieved.
 - LU-9.4.1 Consider revision of the City's Development Standards to encourage innovative land use management techniques. (Reference Goal LU-2.3.1)
- LU-9.5 Do not permit private residential gated communities.
- LU-9.6 Promote nearby access to healthy food for residential developments.
 - LU-9.6.1 Allow and encourage farm stands supplying fresh food in residential areas.
 - LU-9.6.2 Consider measures to encourage the creation of healthy corner stores within residential areas.

GOAL LU-10: Identify the City's policies and regulations pertaining to commercial and industrial areas and uses.

Policy Action

- LU-10.1 Implement the goals, policies, and actions of the Economic Development Element through the Land Use Element.
- LU-10.2 Encourage industry clusters to create jobs, and increase revenue circulation locally.
- LU-10.3 Ensure adequate supply of developable land along primary transportation corridors and invest in commercial and industrial redevelopment.
- LU-10.4 Encourage developers to concentrate non-residential land uses in integrated centers in order to insure convenient access and prevent strip development.
- LU-10.5 Group commercial, industrial, and manufacturing uses into centers rather than dispersed throughout the City. These centers shall have a landscaped, urban park quality.
- LU-10.6 Rest future development of commercial, manufacturing, and light industrial areas in Tumwater on a comprehensive, integrated planning scheme incorporating performance standards regarding green belts, and buffering, landscaping, parking facilities, and other items of site design as appropriate.

- LU-10.7 Use land use regulations to guide new industrial development into areas and patterns that minimize heavy trucking through residential and business areas.
- LU-10.8 Ensure commercial and industrial structures, where practical, are low profile and provide landscaping including lawns, trees, and shrubs.
- LU-10.9 Locate commercial and industrial land uses close to arterial routes and freeway access and rail facilities.
- LU-10.10 Encourage neighborhood commercial uses that supply nearby residents with everyday convenience shopping goods in the City to reduce traffic generation, where, generally, these uses are very small, not generate excessive traffic, and compatible with nearby residences.
- LU-10.11 Encourage businesses to allow food trucks at work sites to bring diverse meal options and fresh produce to workers.
- LU-10.12 Emphasize sustainable practices while encouraging economic development.

GOAL LU-11: Ensure new and existing development is energy efficient.

Policy Action

- LU-11.1 Recognize potential energy efficiencies associated with mixed-use developments and centers.
- LU-11.2 Encourage building design, orientation, and land use arrangements that take advantage of natural landforms, existing vegetation, and climatic features for reducing energy demands for heating and cooling purposes.
- LU-11.3 Aggressively pursue conservation or system improvements as a potential means to defer the siting and development of new facilities where appropriate.
- LU-11.4 Recognize savings in energy usage for heating and cooling purposes associated with common wall construction.
- LU-11.5 Encourage existing and new development to use landscaping to take advantage of the sun's warming rays in winter and to provide shade in summer.
- LU-11.6 Recognize potential energy savings through optimally using solar energy and orient development sites accordingly.
- LU-11.7 Consider the impact of new development and landscaping on solar accessibility of adjoining lots and mitigate wherever feasible.
- LU-11.8 Encourage development and integration of new energy technologies in the design of new development and redevelopment, which result in energy and cost savings.
- LU-11.9 Develop a program to encourage energy retrofits of existing buildings to improve their energy efficiency.

LU-11.10 Coordinate the City’s energy efficiency programs with the strategies in the most recent version of the Thurston Climate Mitigation Plan.

GOAL LU-12: Promote preservation of sites of historical and cultural significance.

Policy Action

- LU-12.1 Ensure coordination of the Land Use Element with Tumwater and Thurston County historic preservation programs.
- LU-12.2 Make land use decisions that protect designated state and national landmarks listed by the State Office of Archaeology and Historic Preservation.

GOAL LU-13: Protect Olympia Regional Airport from incompatible land uses and activities that could affect present and future use of airport facilities and operations. Regulations and criteria should reflect the urban environment adjacent to the airport.

Policy Action

- LU-13.1 Promote safe operation of Olympia Regional Airport by encouraging compatible land uses and activities and discouraging uses or activities that will impede safe flight operations or endanger the lives of people on the ground.
- LU-13.2 Coordinate protection of Olympia Regional Airport with Thurston County by developing consistent implementing regulations.

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

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

General Government Committee, September 13, 2023



Intent

- Discuss Growth Management Act Goals
- Present the current version of the Land Use Element
- Consider specific issues for the Element
- Consider how to incorporate diversity, equity, and inclusion
- Discuss state guidance materials

Growth Management Act Goals

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

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

(3) **Transportation.** Encourage efficient multimodal transportation systems that will reduce greenhouse gas emissions and per capita vehicle miles traveled, and are based on regional priorities and coordinated with county and city comprehensive plans.



Growth Management Act Goals

(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.

(5) **Economic development.** Encourage economic development throughout the state that is consistent with adopted comprehensive plans, promote economic opportunity for all citizens of this state, especially for unemployed and for disadvantaged persons, promote the retention and expansion of existing businesses and recruitment of new businesses, recognize regional differences impacting economic development opportunities, and encourage growth in areas experiencing insufficient economic growth, all within the capacities of the state's natural resources, public services, and public facilities.



Growth Management Act Goals

(6) **Property rights.** Private property shall not be taken for public use without just compensation having been made. The property rights of landowners shall be protected from arbitrary and discriminatory actions.

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



Growth Management Act Goals

(8) **Natural resource industries.** Maintain and enhance natural resource-based industries, including productive timber, agricultural, and fisheries industries. Encourage the conservation of productive forestlands and productive agricultural lands, and discourage incompatible uses.

(9) **Open space and recreation.** Retain open space and green space, enhance recreational opportunities, enhance fish and wildlife habitat, increase access to natural resource lands and water, and develop parks and recreation facilities.



Growth Management Act Goals

(10) **Environment.** Protect and enhance the environment and enhance the state's high quality of life, including air and water quality, and the availability of water.

(11) **Citizen participation and coordination.** Encourage the involvement of citizens in the planning process, including the participation of vulnerable populations and overburdened communities, and ensure coordination between communities and jurisdictions to reconcile conflicts.



Growth Management Act Goals

(12) **Public facilities and services.** Ensure that those public facilities and services necessary to support development shall be adequate to serve the development at the time the development is available for occupancy and use without decreasing current service levels below locally established minimum standards.

(13) **Historic preservation.** Identify and encourage the preservation of lands, sites, and structures, that have historical or archaeological significance.



Growth Management Act Goals

(14) **Climate change and resiliency.** Ensure that comprehensive plans, development regulations, and regional policies, plans, and strategies under RCW 36.70A.210 and chapter 47.80 RCW adapt to and mitigate the effects of a changing climate; support reductions in greenhouse gas emissions and per capita vehicle miles traveled; prepare for climate impact scenarios; foster resiliency to climate impacts and natural hazards; protect and enhance environmental, economic, and human health and safety; and advance environmental justice.

(15) **Shorelines of the state.** For shorelines of the state, the goals and policies of the shoreline management act as set forth in RCW 90.58.020 shall be considered an element of the county's or city's comprehensive plan.



State Requirements for the Land Use Element

In addition to meeting the Growth Management Act goals, the City's Land Use Element will need to address the following:

1. Designate the proposed general distribution and general location and extent of the uses of land
2. Include population densities, building intensities, and estimates of future population growth
3. Provide for protection of the quality and quantity of groundwater used for public water supplies.
4. Give special consideration to achieving environmental justice in its goals and policies, including efforts to avoid creating or worsening environmental health disparities



State Requirements for the Land Use Element

4. Consider utilizing urban planning approaches that promote physical activity and reduce per capita vehicle miles traveled within the jurisdiction, but without increasing greenhouse gas emissions elsewhere in the state
5. Review drainage, flooding, and stormwater runoff in the area and nearby jurisdictions and provide guidance for corrective actions to mitigate or cleanse those discharges that pollute waters of the state, including Puget Sound or waters entering Puget Sound
6. Reduce and mitigate the risk to lives and property posed by wildfires by using land use planning tools



Structure of Current Land Use Element

1. Introduction

- 1.1 Purpose and Scope, including Table of Foundational Plans and Documents
- 1.2 Vision and Mission Statements
- 1.3 Strategic Plan Goals
- 1.4 Growth Management Act Goals Compliance
- 1.5 County-Wide Planning Policy Compliance
- 1.6 Sustainable Thurston Goals

Structure of Current Land Use Element

1. Introduction

1.7 Ongoing Review Program

1.8 Amendments, Public Participation, and Intergovernmental Coordination

1.9 Overall Comprehensive Plan Connections

1.10 Tumwater Community Profile

1.11 Tumwater Land Use Patterns

1.12 Existing Land Use Distribution

1.13 Land Use Distribution



Designations and Definitions

2. Designations and Definitions

2.1 Introduction, including Citywide Future Land Use Map

2.2 – 2.15 Use Categories

2.16 Design Review

2.17 Maximum and Minimum Densities

2.18 Clustering

2.19 Modular and Manufactured Housing

2.20 Innovative Housing and Urban Planning Approaches Promoting Physical Activity



Goals, Policies, and Actions & Land Supply Analysis

3. Land Use Goals, Policies, and Actions

3.1 Introduction

3.2 Goals, Policies, and Actions

3.3 Implementation Policies

4. Land Supply Analysis

4.1 Introduction

4.2 Partially Used and Under Utilized Land Supply Analysis

4.3 Developable or Re-developable Land Supply Analysis

4.4 Analysis of Population Accommodation



Other Parts of the Land Use Element

- Appendices
 - A. Neighborhoods
 - B. County-Wide Planning Policies
 - C. Sustainable Thurston Goals and Actions
 - D. Land Use and Housing Survey Results
 - E. List of Foundational Plans and Documents
 - F. Glossary
 - G. Ordinance No. 02016-012
 - H. 2016 Tumwater Soil Report
- Land Use Maps
 - City-Wide Future Land Use Map
 - Neighborhood Maps
- Subarea Plans
 - Brewery District Plan
 - Capitol Boulevard Corridor Plan
 - Littlerock Road Subarea Plan



Current Land Use Element

Link to current Land Use Element:

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

Commerce Land Use Guidance Materials

- Urban Growth Area Guidebook
- Periodic Update Checklist for Fully-Planning Cities

The Commerce has provided guidance specific to the periodic update on their Periodic Update webpages:

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

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



Urban Growth Area Guidebook

- Commerce published the Guide to explain the necessary steps in the updating Land use Elements
- The Guidebook describes the process for reviewing, updating and implementing urban growth areas, which comprises the City and its associated urban growth area, including population forecasts and conducting a fiscal analysis for urban services




Urban Growth Area Guidebook

Reviewing, Updating and Implementing Your
Urban Growth Area



Periodic Update Checklist for Fully-Planning Cities

- The Periodic Update Checklist helps cities planning under the Growth Management Act conduct the periodic review and update of comprehensive plans and development regulations required by RCW 36.70A.130(4)
- The checklist identifies what needs to need be updated to reflect local conditions or to comply with changes in law since the last periodic update



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.

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 _____



Other Guidance Materials

In addition, the Puget Sound Regional Council is conducting 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

Municipal Research Services Center has a Comprehensive Planning webpage.

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



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 GGC Briefings

1. Land Use and Housing Elements –September 13, 2023
2. Development Code Update – October 11, 2023
3. Climate and Conservation Elements –November, 8 2023
4. Economic Development Plan and the Lands for Public Purposes and Utilities Elements –December 13, 2023
5. Transportation Plan –January 10, 2024



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 Briefings – January 2024 – October 2024
 - Development Code Amendment Briefings – 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

- Scope of Development Code Amendments
 - General Government Committee – October 11, 2023
- Update Process Check In
 - City Council Work Session – October 24, 2023



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:

Brad Medrud, AICP
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
www.ci.tumwater.wa.us/2025CompPlan



Tumwater City Plan 2036 Land Use Element



**CITY OF TUMWATER
LAND USE ELEMENT**

*2016 Update/Adopted December 20, 2016,
Amended November 2, 2020, O2020-002
Amended October 19, 2021, O2021-003*

TUMWATER CITY COUNCIL

Pete Kmet, Mayor
Neil McClanahan, Mayor Pro Tem
Nicole Hill
Tom Oliva
Joan Cathey
Eileen Swarthout
Ed Hildreth
Debbie Sullivan

TUMWATER PLANNING COMMISSION

Deborah Reynolds, Chair
Nancy Stevenson, Vice Chair
Terry Kirkpatrick
Dennis Morr Jr.
Leatta Dahlhoff
Jessica Hausman
Joel Hansen
Michael Althausen

TUMWATER CITY STAFF

John Doan, AICP, City Administrator
Michael Matlock, AICP, Community Development Director
Brad Medrud, AICP, Planning Manager
David Ginther, Senior Planner
Megan Lande, Planning Intern
Paula Reeves, Former Planning Manager

**CITY OF TUMWATER
LAND USE ELEMENT**

*2016 Update/Adopted December 20, 2016,
Amended November 2, 2020, O2020-002
Amended October 19, 2021, O2021-003*

**LAND USE ELEMENT
TABLE OF CONTENTS**

TABLE OF CONTENTS

1	INTRODUCTION	1
1.1.	Purpose and Scope.....	1
1.2	Vision and Mission Statements	4
1.3	Strategic Plan Goals.....	5
1.4	Growth Management Act Goals Compliance	5
1.5	County-Wide Planning Policy Compliance.....	10
1.6	Sustainable Thurston Goals	14
1.6.1	Priority Goals	14
1.6.2	Leadership & Participation Goals	14
1.6.3	Community Goals.....	15
1.6.4	Economy Goals	15
1.6.5	Housing Goals	15
1.6.6	Transportation System Goals	15
1.6.7	Public Safety Goals	15
1.6.8	Environment Goals	16
1.7	Ongoing Review Program	16
1.8	Amendments, Public Participation, and Intergovernmental Coordination	16
1.8.1	Amendments	16
1.8.2	Public Participation and Intergovernmental Coordination Procedures	17
1.9	Overall Comprehensive Plan Connections.....	18
1.10	Tumwater Community Profile.....	20
1.11	Tumwater Land Use Patterns	21
1.12	Existing Land Use Distribution.....	22
1.13	Land Use Distribution	22
2	DESIGNATIONS AND DEFINITIONS.....	27
2.1	Introduction	27
2.1.1	City-Wide Future Land Use Map	28
2.2	Residential Uses	29
2.2.1	Residential/Sensitive Resource (2-4 Dwelling Units/Acre).....	32
2.2.2	Single Family Low Density (4-7 Dwelling Units/Acre)	34
2.2.3	Single Family Medium Density (6-9 Dwelling Units/Acre).....	34
2.2.4	Multi-Family Medium Density (9-15 Dwelling Units/Acre)*	35
2.2.5	Multi-Family High Density (14-29 Dwelling Units/Acre)*.....	36
2.2.6	Manufactured Home Park (6-9 Dwelling Units/Acre)	37

LAND USE ELEMENT TABLE OF CONTENTS

2.3	Mixed Use (Residential Minimum 14 Dwelling Units/Acre)	38
2.4	Neighborhood Commercial.....	42
2.5	New Market Historic District	42
2.6	General Commercial.....	42
2.7	Capitol Boulevard Community	43
2.8	Brewery District	44
2.9	Light Industrial	45
2.10	Airport Related Industrial	45
2.11	Heavy Industrial	45
2.12	Utilities	46
2.13	Public and Institutional	46
2.14	Parks and Open Space	46
2.15	Tumwater Town Center	47
2.16	Design Review	47
2.17	Maximum and Minimum Densities.....	50
2.18	Clustering	50
2.19	Modular and Manufactured Housing	51
2.20	Innovative Housing and Urban Planning Approaches Promoting Physical Activity.....	51
3	LAND USE GOALS, POLICIES, AND ACTIONS	53
3.1	Introduction	53
3.2	Goals, Policies, and Actions	53
3.3	Implementation Policies	66
4	LAND SUPPLY ANALYSIS	69
4.1	Introduction	69
4.2	Partially Used and Under Utilized Land Supply Analysis	71
4.3	Developable or Re-developable Land Supply Analysis	72
4.4	Analysis of Population Accommodation	74

LIST OF TABLES

Table 1.	Foundational Plans and Documents.....	2
Table 2.	Summary of Existing Land Use in Tumwater	22
Table 3.	Existing Land Use by Neighborhood (in Percentages)	25
Table 4.	Existing Land Use by Neighborhood (in Acres)	26
Table 5.	Tumwater Land Use Designations	28
Table 6.	Range of Dwelling Units per Acre by Land Use Designation and Zone District	31
Table 7.	Land Use Management Techniques for Residential Development	38

LAND USE ELEMENT TABLE OF CONTENTS

Table 8. Tumwater and Urban Growth Area 20-Year Population Projection.....	71
Table 9. Buildable Commercial Land in Acres	73
Table 10. Buildable Industrial Lands in Acres	74
Table 11. Residential Land Supply and Future Development Capacity	74

LIST OF FIGURES

Figure 1. Comprehensive Plan Elements	20
Figure 2. Tumwater Existing Land Use	23
Figure 3. New Dwelling Units Required for 20-Year Planning Period.	76

LIST OF MAPS

Airport Future Land Use Map
 Brewery District Future Land Use Map
 Bush Prairie Neighborhood Future Land Use Map
 City-Wide Future Land Use Map
 Deschutes Neighborhood Future Land Use Map
 Littlerock Neighborhood Future Land Use Map
 Mottman Neighborhood Future Land Use Map
 Neighborhoods Map
 New Market Neighborhood Future Land Use Map
 SE Capitol Boulevard Neighborhood Future Land Use Map
 SW Tumwater Neighborhood Future Land Use Map
 Town Center Subdistricts Future Land Use Map
 Trospen Neighborhood Future Land Use Map
 Tumwater Hill Neighborhood Future Land Use Map

LAND USE ELEMENT APPENDICES: UNDER SEPARATE COVER

Appendix A:	Neighborhood Appendix
Appendix B:	County-Wide Planning Policies
Appendix C:	Sustainable Thurston Goals and Actions
Appendix D:	Land Use and Housing Survey Results
Appendix E:	List of Foundational Plans and Documents
Appendix F:	Glossary
Appendix G:	Ordinance No. O2016-012 City Council Final Order

1 INTRODUCTION

1.1. Purpose and Scope

The Land Use Element of the Tumwater Comprehensive Plan was prepared in accordance with the requirements of the Growth Management Act (Chapter 36.70A RCW), adopted Thurston County-Wide Planning Policies, and Sustainable Thurston Policies and Actions.

The Land Use Element covers the 20-year planning period from 2015 to 2035,¹ and designates the proposed general distribution, location, and extent of housing, commerce, industry, recreation, open spaces, the general aviation airport, public utilities, public facilities, agricultural land, mineral resource land, and transportation as it relates to land use. It also incorporates urban planning approaches that promote sustainable, compact community development that is livable, walkable, safe, sustainable, and economically vibrant. The Land Use Element includes population densities, building intensities, and estimates of future population growth.

Along with the Conservation and Lands for Public Purposes Elements, the Land Use Element also provides for protection of the quality and quantity of groundwater used for public water supplies. Through adoption of the Hazard Mitigation Plan, the Land Use Element, along with the Conservation and Lands for Public Purposes Elements, reviews drainage, flooding, and storm water run-off in the area and provides guidance for corrective actions to mitigate or cleanse those discharges that pollute waters of the state, including Puget Sound or waters entering Puget Sound.

Areas that are within Tumwater's Urban Growth Area are addressed through the Tumwater and Thurston County Joint Plan in accordance with adopted County-Wide Planning Policies.

The Land Use Maps represent the general future land use patterns intended for Tumwater within the 20-year planning period. They are a graphic expression of the policies found in Chapter 3, Land Use Goals, Policies, and Actions, and in each neighborhood chapter in the Neighborhood Appendix.

The plan divides the City into eleven neighborhood areas recognizing different land use planning needs. The Neighborhood Appendix consists of an outline, a map, and text referencing each area on the map. The text contains a description of current land use, trends for each neighborhood, and sets forth policy recommendations for future land

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.

**LAND USE ELEMENT
CHAPTER 1**

INTRODUCTION

use. The Neighborhood Appendix outlines provide a quick reference that includes policy recommendations for particular areas in each neighborhood.

Specific information on policy recommendations for each land use designation can be found in Chapter 2, Designations, and Definitions. The neighborhood maps graphically represent policy recommendations for future land uses for each neighborhood in Tumwater for the 20-year planning period.

Table 1 identifies the foundational planning documents that form the basis for the Land Use Element of the Comprehensive Plan. These documents are incorporated by reference into this plan.

Table 1. Foundational Plans and Documents

Topic Index	Supporting Plans and Materials
Land Use	<ul style="list-style-type: none"> • Brewery Action Plan (2016) • Brewery District Plan (2014) • Capitol Boulevard Corridor Plan (2015) • Citywide Design Guidelines (2016) • County-Wide Planning Policies, Thurston County (2015) • Little Rock Subarea Plan (2011) • Memorandum of Understanding: An Urban Growth Management Agreement, Tumwater and Thurston County (1988) • Memorandum of Understanding: Urban Growth Area Zoning and Development Standards, Tumwater and Thurston County (1995) • Port of Olympia Master Plan (2016) • Shoreline Master Program (2014) • Sustainable Thurston, Thurston Regional Planning Council (2013) • Tumwater Historic District Master Plan (1993) • Tumwater Town Center Street Design (2004)

**LAND USE ELEMENT
CHAPTER 1**

INTRODUCTION

Topic Index	Supporting Plans and Materials
Population and Employment	<ul style="list-style-type: none"> • Buildable Lands Report for Thurston County, Thurston Regional Planning Council (2014) • Population and Employment Forecast for Thurston County Final Report, Thurston Regional Planning Council (2015) • State Office of Financial Management Data (2015) • The Profile, Thurston Regional Planning Council (October 2015) • US Census Data (2010)
Housing	<ul style="list-style-type: none"> • See Housing Element
Landfills	<ul style="list-style-type: none"> • See Lands for Public Purposes Element
Parks, Recreation, and Open Space	<ul style="list-style-type: none"> • See Conservation Element • See Lands for Public Purposes Element • See Parks, Recreation, and Open Space Plan (Element) • Shoreline Master Program (2014) • Capital Facilities Plan (2016-2021)
Sewage Treatment Facilities and Sanitary Sewer Systems	<ul style="list-style-type: none"> • See Lands for Public Purposes Element

LAND USE ELEMENT
CHAPTER 1

INTRODUCTION

Topic Index	Supporting Plans and Materials
Transportation System	<ul style="list-style-type: none"> • See Transportation Element • Capital Facilities Plan (2016-2021) • 2040 Regional Transportation Plan, Thurston Regional Planning Council (2016) • Black Hills Subarea Transportation Plan, City of Tumwater, Thurston County, Tumwater School District, and the Doelman Family (2003) • Intercity Transit Strategic Plan (2016-2021) • Port of Olympia Master Plan (2016) • Railroad Right of Way Preservation and Use Strategy for the Thurston Region (1992) • Regional Transportation Improvement Program, Thurston Regional Planning Council (2016-2019) • Thurston Regional Trails Plan, Thurston Regional Planning Council (2007) • Transportation Improvement Plan (2016-2021)
Utilities	<ul style="list-style-type: none"> • See Utilities Element
Water and Waste Water	<ul style="list-style-type: none"> • See Conservation Element • See Lands for Public Purposes Element

1.2 Vision and Mission Statements

The following Vision and Mission Statements provide overarching direction for the future of the City. These statements were developed through the City's Strategic Planning Process.

***Vision Statement:** Tumwater of the future will be people-oriented and highly livable, with a strong economy, dynamic places, vibrant neighborhoods, a healthy natural environment, diverse and engaged residents, and a living connection to its history.*

***Mission Statement:** In active partnership with its citizens, the City of Tumwater provides leadership and essential municipal services to cultivate a prosperous economy, a healthy natural environment, vibrant neighborhoods, and a supportive social fabric.*

1.3 Strategic Plan Goals

The following Strategic Plan Goals establish the priorities for realizing the City's Vision. These goals were developed through the City's Strategic Planning Process.

Goal #1: Strengthen Tumwater's Civic Society, Neighborhoods, and Residential Quality of Life

Goal #2: Create Dynamic and Vibrant Places for Residents and Visitors

Goal #3: Facilitate Desirable Economic Development Consistent with the Community's Vision

Goal #4: Promote Development that is Environmentally Sustainable and Provides for a Healthy Community

Goal #5: Manage City Resources Effectively

1.4 Growth Management Act Goals Compliance

The Growth Management Act requires that Tumwater show how the Land Use Element meets the relevant planning goals contained within the Act. The following is a listing of the applicable goals to land use and an analysis of how the Land Use Element helps meet these goals:

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

The availability of services, including roads, water and sewer facilities, has been expressly considered when applying all land use designations in the Land Use Element. The density ranges for all residential land use designations are consistent with available or planned public facilities and services. Recently completed subarea plans are incorporated into the Land Use Element to encourage development in these areas where facilities and services exist including the Littlerock Road Subarea Plan, Brewery District Plan, and Capitol Boulevard Corridor Plan. Specific goals that support this Growth Management Act goal are outlined in Chapter 3, Land Use Goals, Policies, and Actions and they include Goal LU-2, Policies LU-2.1 – 2.10.

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

Each residential designation in the Land Use Element has been carefully made to provide adequate density for feasible sewerage, while protecting sensitive areas as identified by established criteria. The Land Use Element contains goals, policies, and actions that encourage compact, efficient urban development and encourages urban growth to be phased outward from the urban core. These policies include minimum density requirements, clustering in sensitive areas, overall higher residential densities throughout the City, and mixed residential and commercial areas. These goals and policies are outlined in detail in Chapter 3, Land Use Goals, Policies, and Actions. Specific goals that support this Growth Management Act goal include Goal LU-2, Policies LU-2.1 through LU-2.4 and Goal LU-3, Policies LU-3.1 through LU-3.7.

3. *Transportation. Encourage efficient multi-modal transportation systems that are based on regional priorities and coordinated with county and city comprehensive plans.*

The Land Use Element contains goals, policies, and actions that ensure coordination with regional and local transportation plans and include Goal LU-5, Policies LU-5.1 through LU-5.4. The Land Use Element also proposes residential, mixed-use, and neighborhood commercial land use designations that will encourage multi-modal, transit oriented development in Chapter 2, Designations, and Definitions.

4. *Housing. 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.*

The issues of providing affordable housing are more specifically set forth in the Housing Element of the Comprehensive Plan. The Land Use Element plays a smaller role in allocating sufficient land to insure an adequate supply of buildable land. Each residential land use designation, including the Mixed Use designation, provides a variety of housing types at varying densities. Each Neighborhood subarea of the Land Use Element also contains sufficient variability in housing types to ensure that housing needs can be met for all segments of the Tumwater population for the next 20 years.

Additionally, the Land Use Element, in conjunction with the Housing Element, includes policies and land use designations designed to ensure

the provision of affordable housing. These policies are outlined in detail in Chapter 3, Land Use Goals, Policies, and Actions. Specific goals that support this Growth Management Act goal include Goal LU-4, Policies LU-4.1 through LU-4.6. The Housing Element includes a variety of policies expressly designed to encourage housing affordability, including but not limited to, a multitude of regulatory changes dispersed throughout the document.

5. *Economic development. Encourage economic development throughout the state that is consistent with adopted comprehensive plans, promote economic opportunity for all citizens of this state, especially for unemployed and for disadvantaged persons, and encourage growth in areas experiencing insufficient economic growth, all within the capacities of the state's natural resources, public services, and public facilities.*

The Land Use Element ensures the provision of adequate land for commerce and industry in the City and specific policies and actions that support this Growth Management Act goal are outlined in Chapter 3, Land Use Goals, Policies, and Actions. The Economic Development Element adopted in 2010 also makes specific recommendations for economic development in Tumwater.

6. *Property rights, Private property shall not be taken for public use without just compensation having been made. The property rights of landowners shall be protected from arbitrary and discriminatory actions.*

The Attorney General is directed under RCW 36.70A.370 to advise state agencies and local governments on an orderly, consistent process that better enables the government to evaluate proposed regulatory or administrative actions to assure that these actions do not result in unconstitutional takings of private property. Local governments that plan under the Growth Management Act must use this process. The City adheres to the Attorney General's Advisory Memorandum: *Avoiding Unconstitutional Takings of Private Property*, which was developed to provide local governments with a tool to assist them in the process of evaluating land use actions.

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

The Land Use Element provides the policy basis for the City's development regulations to be developed in a systematic, fair manner. All

jurisdictions fully planning under the Growth Management Act must use all the permit procedures found in Chapter 36.70B RCW, Local Project Review to administer permit application processes. Project permit processing standards are provided in Tumwater Municipal Code Title 14.

8. *Natural resource industries. Maintain and enhance natural resource-based industries, including productive timber, agricultural, and fisheries industries. Encourage the conservation of productive forest lands and productive agricultural lands, and discourage incompatible uses.*

The Land Use Element ensures the viability of natural resource industries in Tumwater through the identification of such lands in the Land Use Element text and maps. Additionally, the Conservation Element, a part of the Comprehensive Plan, has specific guidelines and policies that ensure the viability of natural resource industries and activities. Policy LU-2.7 supports this Growth Management Act goal in Chapter 3, Land Use Goals, Policies, and Actions.

9. *Open space and recreation. Encourage the retention of open space and development of recreational opportunities, conserve fish and wildlife habitat, increase access to natural resource lands and water, and develop parks.*

The Land Use Element, in conjunction with the Parks, Recreation, and Open Space Plan (Element), designates areas of the City that would be appropriate for future open space and recreation uses. The Land Use Element reinforces the recommendations of the Parks, Recreation, and Open Space Plan (Element) through the designations in the Land Use Element and in the goals and policies. These policies are outlined in detail in Chapter 3, Land Use Goals, Policies, and Actions. Goal LU-7, Policies LU-7.1 through LU-7.4 supports the Growth Management Act goal.

10. *Environment. Protect the environment and enhance the state's high quality of life, including air and water quality, and the availability of water.*

Each designation in the Land Use Element has been crafted to be of an appropriate intensity for where it is applied. Areas of environmental sensitivity are designated as open space or they have received a designation of a lower intensity than other areas of the City. The Land Use Element contains goals and policies, which ensure coordination of land use with Chapter 13.12 Tumwater Municipal Code and Drainage

Design and Erosion Control Manual for Tumwater. The Conservation Element also contains specific policies relating to air and water quality, water availability, and protection and preservation of critical areas. The Land Use Element also makes recommendations for clustering and other creative development techniques in sensitive areas of the City and includes Goal LU-6, Policies LU-6.1 through LU-6.3; Goal LU-8, Policies 8.1 through 8.4; and Chapter 2, Designations and Definitions.

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

For the Comprehensive Plan update, the City followed the strategy summarized in Section 1.8, Amendments, Public Participation, and Intergovernmental Coordination of the Land Use Element. This is discussed in more detail in the 2016 Community Engagement Plan. The City developed and distributed a community survey to obtain citizen input on Tumwater as a place to live, work, shop, and play now and in the future. The community was notified of the survey via Tumwater On Tap, a monthly electronic newsletter. An article was published in the 2015 City Report to the Taxpayers mailed out to all households the first two weeks of April 2015.

The City also posted the survey on its website and Facebook pages, and had paper copies available at the Community Development counter. Results of the survey are provided in Appendix C: Land Use and Housing Survey Results. Another core part of community engagement strategy for the Comprehensive Plan update was a series of community meetings called “Coffee Talks” designed to provide a comfortable discussion form at neighborhood meetings and other boards, committees, clubs, and groups across the City.

12. *Public facilities and services. Ensure that those public facilities and services necessary to support development shall be adequate to serve the development at the time the development is available for occupancy and use without decreasing current service levels below locally established minimum standards.*

All non-open space designations in the Land Use Element are applied to areas that either have adequate capacity for transportation, utilities, storm, and municipal services or they will be provided with these facilities in the future concurrent with development. The Land Use Element will

ensure concurrency through coordination with the Capital Facilities Element, Transportation Element and other elements of the Comprehensive Plan. The Land Use Element contains goals and policies that ensure this coordination. These policies are outlined in detail in Chapter 3, Land Use Goals, Policies, and Actions. Specific goals and policies that support this Growth Management Act goal include Goal LU-1, Policy LU-1.1; Goal LU-2, Policies LU-2.1 through LU-2.4 and LU-2.6; and Goal LU-3, Policies LU-3.1 through LU-3.7.

13. *Historic preservation. Identify and encourage the preservation of lands, sites, and structures that have historical or archaeological significance.*

The Land Use Element designates an area of the City as the New Market Historic District. The New Market Historic District Master Plan was adopted by the City Council in November of 1993. The Master Plan provides a framework for action and it will ensure the preservation of historic and archeological resources in the Historic District. More discussion of the Master Plan is found in Chapter 2, Designations and Definitions.

14. *Shorelines of the state. The goals and policies of the Shoreline Master Program shall be considered an element of the City's comprehensive plan.*

The Shoreline Master Program was adopted in 2012 as an Element of the Comprehensive Plan. This Shoreline Master Program addresses land uses on all lands under the jurisdiction of the Shoreline Management Act in order to protect and preserve fish and wildlife habitat and the shorelines of the state (RCW 36.70A.480(1)).

1.5 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 adopted County-Wide Planning Policies are included in this document in their entirety in Appendix B. The following is a brief description of how the Land Use Element is consistent with the adopted County-Wide Planning Policies:

I. General Policies

The Land Use Element contains goals, policies, and actions that address County-Wide Planning Policies 1.1 through 1.14. These goals, policies,

and actions encourage compact, efficient urban development that will be phased outward from the urban core.

II. Urban Growth Areas

The Land Use Element contains goals, policies, and actions that address County-Wide Planning Policies 2.1 through 2.5. Planning for growth within the City's Urban Growth Area will be consistent with the Urban Growth Area boundaries established through the Tumwater and Thurston County joint planning process and the Tumwater and Thurston County Joint Plan. For more information, see response to Policy IV below.

III. Promotion of Contiguous and Orderly Development, Provision of Urban Services, and Protection of Rural Areas

The Land Use Element contains goals, policies, and actions that address County-Wide Planning Policies 3.1 through 3.4. These goals, policies, and objectives encourage compact, efficient urban development that is phased outward from the urban core. It also proposes residential and mixed-use land use designations that will encourage the development of compact urban areas.

To help address County-Wide Planning Policy 3.1, each residential designation in the Land Use Element and their geographic application in the City meet each facet of this goal by providing for adequate density to accommodate the 20-year population growth in a sustainable manner. In doing so, the Plan uses of innovative development techniques such as clustering and Transfer of Development Rights to protect natural resource areas. It has been demonstrated in the Land Use Element that the City can meet its population projections over the planning period. The Tumwater and Thurston County joint planning process will also address these issues for the for the City's Urban Growth Area. Please refer to Goal LU-2, Policies LU-2.1 through LU-2.4; Goal LU-3, Policies LU-3.1 through LU-3.7; Goal LU4, Policies LU-4.2 and LU-4.4 through LU-4.6; and Chapter 2, Designations and Definitions.

To address County-Wide Planning Policy 3.2, the designation of two to four residential units per acre in particularly unique sensitive areas is consistent with this policy in its entirety. Any development in areas so designated will have services concurrent with development; and all areas of the City are governed by the Urban Growth Management Agreement, which prohibits extension of water or sewer outside the Urban Growth

Area except for public health reasons. This goal is met.

Coordination between Tumwater and adjoining jurisdictions is accomplished through a number of documents and agreements including the Tumwater and Thurston County Joint Plan, the 1988 Memorandum of Understanding: *An Urban Growth Management Agreement*, the 1995 Memorandum of Understanding: *Urban Growth Area Zoning and Development Standards*, and the County-Wide Planning Policies including County-Wide Planning Policy 3.3.

To address County-Wide Planning Policy 3.4, the City coordinates with existing service providers such as fire districts, utility providers, and Thurston County to ensure an orderly transfer before, during, and after annexations. Effective annexation of Urban Growth Areas is encouraged in the Comprehensive Plan. This goal is met.

IV. *Joint County & City Planning Within Urban Growth Areas*

To address County-Wide Planning Policies 4.1 through 4.5, Thurston County and the City of Tumwater adopted the Tumwater and Thurston County Joint Plan. This plan, an element of the Tumwater Comprehensive Plan, creates a process for joint planning within Tumwater's Urban Growth Area including several "islands" or areas that are surrounded by Tumwater city limits. For more information on Tumwater and Thurston County Joint Plan amendments, refer to Section 1.8.1, Amendments.

VI. *Analysis of Fiscal Impact*

To address County-Wide Planning Policies 6.1 through 6.3, each non-open space designation in the Land Use Element has been crafted to ensure that needed services can be provided at the most efficient cost to the taxpayer given the constraints and environmental sensitivity of the land. Fiscal impacts are also addressed through the Capital Facilities Element. The Land Use Element has been coordinated with the Capital Facilities Element and other elements of the Comprehensive Plan.

VII. *Economic Development and Employment*

To address County-Wide Planning Policies 7.1 through 7.5, the Land Use Element ensures the provision of adequate land for commerce and industry in the City. The Economic Development Element also makes

specific recommendations for economic development in Tumwater.

VIII. Affordable Housing

To address County-Wide Planning Policies 8.1 through 8.7, the Housing Element is the principal policy document concerning affordable housing. The Land Use Element interfaces 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 in Chapter 3, Land Use Goals, Policies, and Actions.

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

IX. Transportation

To address County-Wide Planning Policies 9.1 through 9.10, the Land Use Element contains goals, policies, and actions that ensure coordination with regional and local transportation plans, which include Goal LU-5, Policies LU-5.1 through LU-5.4. The Land Use Element also proposes residential, mixed-use, and neighborhood commercial land use designations that will encourage multi-model, transit-oriented development in Chapter 3, Land Use Goals, Policies, and Actions.

X. Environmental Quality

To address County-Wide Planning Policies 10.1 through 10.9, each land use designation in the Land Use Element has been applied based on specific criteria that include the sensitivity of certain areas to environmental disturbance. These sensitive areas either have received an open space designation or have received a designation of a lower intensity. Additionally, most environmentally sensitive areas of the City recommend that development be clustered away from the sensitive area.

Additionally, the Land Use Element contains goals and policies that ensure coordination of land use with Chapter 13.12 Tumwater Municipal

Code and the Drainage Design and Erosion Control Manual for Tumwater. The Conservation Element, as a part of the Comprehensive Plan, also contains specific policies relating to air and water quality and water availability. The Land Use Element also makes recommendations for clustering and other creative development techniques in sensitive areas of the City in Chapter 3, Land Use Goals, Policies, and Actions and includes Goal LU-6, Policies LU-6.1 through LU-6.4 and Goal LU-8, Policies LU-8.1 through LU-8.5 as well as Chapter 2, Designations and Definitions.

XI. County-Wide Policies which Establish a Process to Develop Future Policies

The Land Use Element is designed to be a flexible document. As conditions and circumstances change, or as regional plans and policies are amended, the Land Use Element can be revised accordingly.

1.6 Sustainable Thurston Goals

Tumwater adopts as part of the Land Use Element of the Comprehensive Plan, the following Sustainable Thurston Goals:

1.6.1 Priority Goals

- Priority Goal 1: Create vibrant centers, corridors, and neighborhoods while accommodating growth.
- Priority Goal 2: Preserve environmentally sensitive lands, farmlands, forest lands, prairies, and rural lands and develop compact urban areas.
- Priority Goal 3: Create a robust economy through sustainable practices.
- Priority Goal 9: Move toward a carbon-neutral community.
- Priority Goal 11: Provide opportunities for everyone in the Thurston Region to learn about and practice sustainability.
- Priority Goal 12: Make strategic decisions and investments to advance sustainability regionally.

1.6.2 Leadership & Participation Goals

LAND USE ELEMENT
CHAPTER 1

INTRODUCTION

L-2: Develop regional plans and strategies essential to meeting sustainability priority goals and targets.

L-3: Increase regional, multi-regional, and state coordination and collaboration.

1.6.3 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.

C-2: Neighborhoods: Create safe and vibrant neighborhoods with places that build community and encourage active transportation.

1.6.4 Economy Goals

EC-2: Foster industry clusters to create jobs, and increase revenue circulation locally.

EC-5: Ensure adequate supply of shovel-ready land along primary transportation corridors and invest in commercial and industrial redevelopment.

1.6.5 Housing Goals

H-2: Increase housing amid urban corridors and centers to meet the needs of a changing population.

H-4: Maximize opportunity to redevelop land in priority areas by investing in infrastructure and environmental remediation.

H-6: Encourage housing density and diversity in neighborhoods to add vibrancy and increase equitable access to opportunity.

1.6.6 Transportation System Goals

T-4: Integrate transportation considerations into land use decisions, and vice versa.

1.6.7 Public Safety Goals

PS-2: Create a resilient region by improving disaster preparedness, response, and recovery efforts, as well as by expanding public safety education.

1.6.8 Environment Goals

E-2: Reduce the region's carbon footprint and protect critical infrastructure in case of extreme weather or sea level rise.

1.7 Ongoing Review Program

Tumwater will undertake a program of ongoing review in order to monitor the performance of the land use strategy. The Thurston Regional Planning Council and all jurisdictions within Thurston County are currently carrying out this program. At the City, this will be done principally through building permit tracking, which is continually updated as new development occurs. In this way, the City can ensure coordination with elements of the Comprehensive Plan such as capital facilities, transportation, and lands for public purposes. The Land Use Element is meant to be a flexible and easily used document. As Tumwater grows and changes, the Land Use Element will need to be revised and amended in order to reflect new circumstances.

1.8 Amendments, Public Participation, and Intergovernmental Coordination

1.8.1 Amendments

The Comprehensive Plan 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. An evaluation of new conditions will be an integral part of the amendment process.

State law allows amendment of the Comprehensive Plan once annually, except in cases of emergency. The process the City uses to amend the plan and development regulations implementing the plan are set forth in Chapter 18.60 Tumwater Municipal Code. The Planning Commission and City Council will individually 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.

The Comprehensive Plan may be amended outside of the normal annual amendment cycle if findings are adopted by the City Council demonstrating that the emergency meets all of the following criteria:

1. The circumstances of the emergency request, if processed within the

**LAND USE ELEMENT
CHAPTER 1**

INTRODUCTION

normal amendment cycle, will result in delays that contribute to significant imminent impact on the community in general, or a specific neighborhood; and

2. The emergency request relates to an issue or issues of a community or neighborhood-wide significance beyond the interests of a particular property owner, provided that an issue pertaining to an individual property may be considered if findings reveal that impacts to the community or specific neighborhood would result from the individual property.

The nature of the emergency and the proposed amendment shall be presented to the City Council, which shall decide if the proposal qualifies as an emergency. Any proposal deemed an emergency should proceed ahead of the normal amendment schedule.

1.8.2 Public Participation and Intergovernmental Coordination Procedures

Public participation in comprehensive planning is required both as a matter of law and policy. The public participation program affirms the City's commitment to public involvement in the planning process. The intent of the program is to ensure that citywide and neighborhood planning are done with the contribution of all interested parties, including residents, property owners, business owners, neighborhood associations, and others. Tumwater will make every effort to involve citizens in the processes to develop and update the Comprehensive Plan, subarea plans, zoning, and other development regulations.

Public participation and intergovernmental coordination procedures are set forth below to insure conformance with the Growth Management Act. Specifically, these procedures are set forth to establish policy providing for early and continuous public participation in the City's development and amendment of the Comprehensive Plan and development regulations implementing the plan. Errors in exact compliance with the established procedures do not invalidate the Comprehensive Plan or development regulations.

1. Before the due date for submittal of requests for Comprehensive Plan amendments, the City will publish an article on the City's media platforms and distribute it to local news media inviting amendment requests and informing the public of the deadline.
2. Proposed amendments to the Comprehensive Plan and development regulations that affect the unincorporated Urban Growth Area will be subject to public hearings by the Tumwater and Thurston County

Planning Commissions, Tumwater City Council, and Thurston County Board of Commissioners.

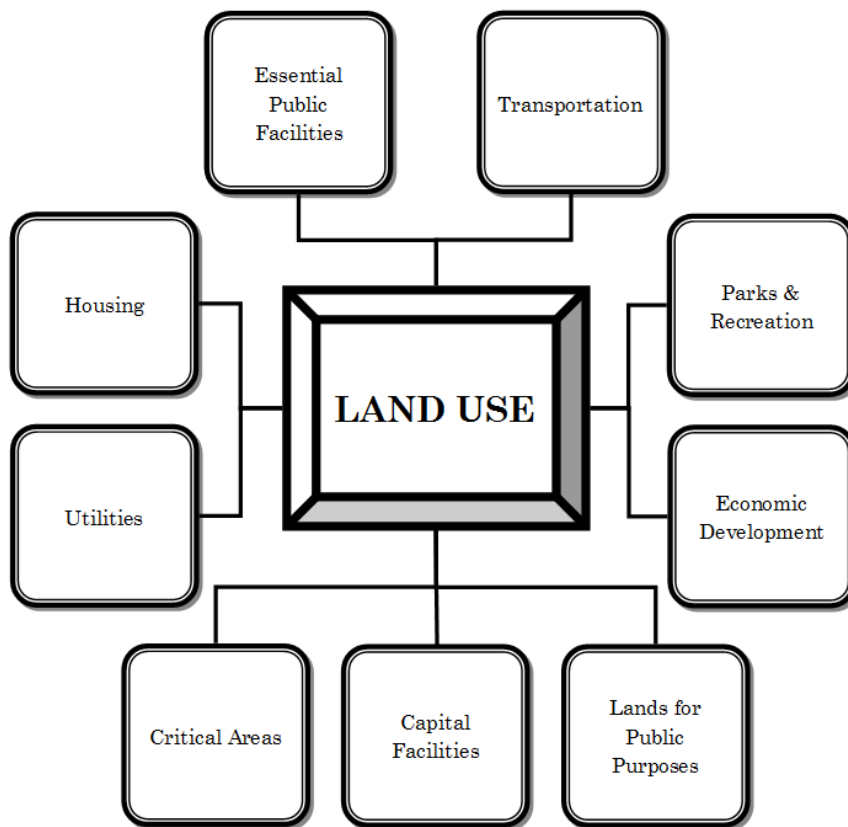
3. City publications, bulk mail, direct mail, email, broadcast and print media, or the City's website should be utilized by the City to inform affected parties about current or proposed plans or regulations, as well as opportunities for participation in City decision processes.
4. Procedures for providing notice of public hearings are set forth in Chapter 18.60 Tumwater Municipal Code. The City should have proposed amendments to the Comprehensive Plan and development regulations available to the public for inspection at City Hall during regular business hours beginning on the first business day following the date the public hearing notice is published.
5. In addition to hearings and other formal opportunities for oral and written public comment, the City should use various outreach techniques such as opinion surveys, speakers programs, forums, workshops, open houses, hands-on events, and task forces.
6. The Planning Commission may request that the Mayor appoint a subcommittee of the Planning Commission when the size, technical complexity, or content of a proposed comprehensive plan or development regulation amendment warrant. The subcommittee would be responsible for preparing draft planning documents and ordinances for Planning Commission consideration. Subcommittee meetings would have the status of open public meetings, which can be attended by any interested individuals or groups.
7. Adjacent local jurisdictions, fire districts, school districts, public transit agencies, appropriate state agencies, Port of Olympia, and the Squaxin Island Tribe will be mailed a notice of draft Comprehensive Plan and development regulation amendment proposals prior to final adoption by the City Council. The notice will contain a description of the amendments and methods for obtaining the draft proposal. Methods for providing input will also be included. Whenever possible, this notification process will be accomplished prior to Planning Commission consideration and in conjunction with the state agency notification requirement set forth in RCW 36.70A.106.

1.9 Overall Comprehensive Plan Connections

**LAND USE ELEMENT
CHAPTER 1****INTRODUCTION**

Figure 1 illustrates graphically the connections that the Land Use Element must have with the other elements of Comprehensive Plan. The connections with the Transportation Element and the Capital Facilities Element are perhaps the most important connections. However, linkage with all of the elements of the Comprehensive Plan are important as a whole in order to ensure orderly, cost-efficient development that is phased outward from the urban core. All elements of the Comprehensive Plan were analyzed for consistency with the Land Use Element and a determination has been made that the Land Use Element is consistent with all other elements of the Comprehensive Plan.

Figure 1. Comprehensive Plan Elements



1.10 Tumwater Community Profile

Tumwater was known as the end of the Oregon Trail. It is the oldest settlement north of the Columbia River. It is located at the point where the Deschutes River cataracts into Puget Sound at its most southerly point. When the City was founded in 1845, it was named New Market. In 1847, the name was changed to Tumwater, as it likened the sound of “throbbing or noisy” water, which was expressed in the native jargon as *Tum Chuck*. The City's early growth and development were greatly influenced by the close proximity to the power-generating falls of the Deschutes River, the nearby saltwater access for transportation and communication, and the abundance of timber in the area. The town developed on the lands around the mouth of the river, and homes and sawmills sprang up along its banks above the original settlement.

On November 25, 1869, Tumwater was officially incorporated as a fourth class town. In 1964, the voters of Tumwater elected to change the classification to a third class City with a Mayor-Council form of government. In 1994, the Tumwater City Council voted to change the classification to a code city but retain the Mayor-Council form of

government. The registered voters of the City elect the Mayor and seven council members to staggered four-year terms.

Tumwater's population in 2014 was 21,939 with an additional 3,250 residing in the City's Urban Growth Area. As of September 2015, the City ranked 55th among the 281 cities in the state, in terms of population.

1.11 Tumwater Land Use Patterns

The City is contiguous with Olympia to the north and stretches for approximately six miles to the south. Tumwater is generally spread out with vacant areas interspersed with other uses. The area of the City is approximately 17.70 square miles or 11,322 acres.

Several important physical features dominate the land use pattern of Tumwater. Among these is the Deschutes River. The Deschutes River has historically influenced the location of Tumwater and its subsequent development. The river and its valley is an important scenic and recreational asset to the City.

Interstate 5 was constructed in 1959 and resulted in the demolition of most of Tumwater's historic downtown area. The freeway divides the City into western and eastern portions. A new City Hall was constructed in 1988, a new library was constructed in 1995, and a new fire station was constructed in 2000 along Israel Road in the southern part of the City. It is anticipated that this area, bordered by Interstate 5, Tumwater Boulevard (formerly Airdustrial Way), Capitol Boulevard, and Israel Road, will become Tumwater's new city center.

An additional influence on the development pattern of Tumwater is the Olympia Regional Airport and New Market Industrial Campus that are located at the southern end of the City. The airport is owned and operated by the Port of Olympia.

Major circulation routes in Tumwater include:

- Capitol Boulevard, which runs south from Olympia on the east side of Tumwater;
- Littlerock Road, which serves as the major north-south route through the western portion of the City;
- Black Lake Boulevard, which comprises a portion of the northwest boundary of Tumwater;

- Tumwater Boulevard, which provides access to the southern part of Tumwater; and
- Trosper Road, which is the focal point of commercial activity in the central part of Tumwater.

These circulation routes have influenced development in Tumwater to a large degree.

1.12 Existing Land Use Distribution

In order to plan effectively for the twenty-year planning period, it is necessary to understand existing land use distribution and trends. In order to accomplish this, Thurston Regional Planning Council has maintained a land use database for Tumwater.

The land use designations used to identify presently existing land uses are not the same as those used to identify future land use on the Land Use Maps and in each neighborhood chapter.

Table 2 and Figure 2 illustrate the results of the inventory citywide.

1.13 Land Use Distribution

Table 2 and Figure 2 summarize existing land use distribution in Tumwater and Tables 3 and 4 summarize the existing land use by neighborhood. The largest percentage of acreage is taken up by residential uses at 29%.

Vacant land represents 16% of the land area, while Public and Institutional comprises the second most predominant land use in Tumwater at 20%. The Olympia Regional Airport takes up the majority of this acreage followed by state facilities and public schools.

Table 2. Summary of Existing Land Use in Tumwater

Type of Land Use	Acreage	Percentage
Residential	3,227	29%
Commercial	470	4%
Industrial	477	4%
Public and Institutional	2,288	20%

LAND USE ELEMENT
CHAPTER 1

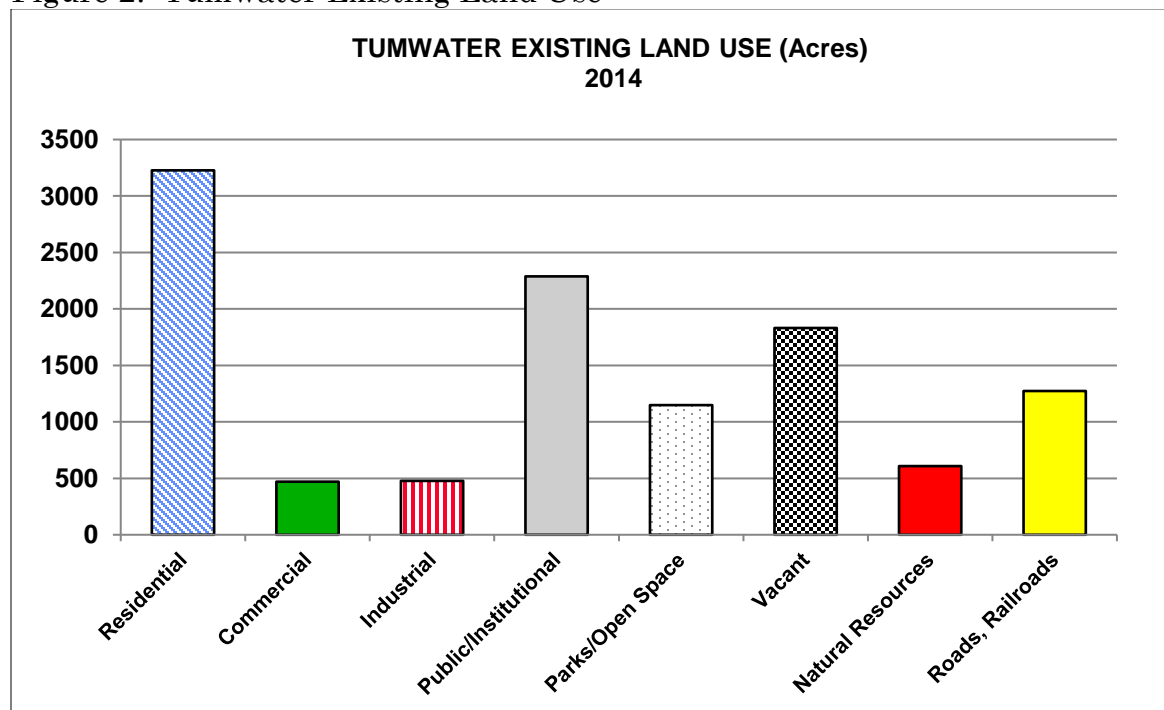
INTRODUCTION

Type of Land Use	Acreage	Percentage
Parks and Open Space	1,148	10%
Vacant	1,831	16%
Natural Resources	608	5%
Roads, Railroads, and Rights of Way	1,273	11%
Total	11,322	100%

Source: Thurston Regional Planning Council data program.

Notes: Airport and surrounding Port of Olympia properties are classified as Public/Institutional.
Tumwater golf course is classified in Parks and Open Space.
Brewery properties are classified as Industrial.

Figure 2. Tumwater Existing Land Use



Roads, railroads, and rights-of-way comprise 11% of the land area, while parks and open space is the fifth most predominant land use in Tumwater at 10%. Open space uses consists mostly of areas presently having a zoning designation such as Greenbelt or Open Space. The Tumwater Valley Municipal Golf Course, Pioneer Park, Barnes Lake, and Trosper Lake are currently zoned Open Space and Green Belt.

Natural Resources are the sixth most predominant land use in Tumwater at 5%. The

**LAND USE ELEMENT
CHAPTER 1****INTRODUCTION**

bulk of this land use is made up of the Jones Quarry at the northwest corner of the City. Industrial and commercial acreage are the seventh and eighth largest land uses in Tumwater at 4%. The Port of Olympia New Market Industrial Park and the Mottman Industrial Park take up a large portion of this acreage. Much of the commercial uses in Tumwater are located along Capitol Boulevard between Custer Way and Israel Road and along Littlerock Road generally south of Trospen Road.

**LAND USE ELEMENT
CHAPTER 1**

INTRODUCTION

Table 3. Existing Land Use by Neighborhood (in Percentages)

Neighborhood	Residential	Commercial	Industrial	Public and Institutional	Parks, Preserves, and Open Space	Vacant	Natural Resources	Roads, Railroads, and Rights of Way	Total
Airport	6%	4%	4%	64%	1%	11%	1%	8%	100%
Brewery	2%	7%	10%	20%	26%	11%	0%	24%	100%
Bush Prairie	37%	2%	1%	3%	27%	20%	3%	8%	100%
Deschutes	39%	1%	0%	0%	44%	4%	0%	12%	100%
Littlerock	36%	5%	2%	7%	5%	18%	17%	10%	100%
Mottman/ Black Lake	30%	3%	19%	5%	2%	15%	20%	6%	100%
New Market	12%	8%	0%	61%	0%	4%	0%	15%	100%
SE Capitol Boulevard	52%	10%	2%	9%	2%	8%	0%	17%	100%
SW Tumwater	10%	11%	9%	2%	4%	51%	0%	13%	100%
Trospen	47%	1%	2%	13%	4%	22%	4%	8%	100%
Tumwater Hill	46%	2%	1%	7%	12%	11%	0%	20%	100%

Source: Thurston Regional Planning Council data program.

Notes: Airport and surrounding Port of Olympia properties are classified as Public and Institutional.
Tumwater Golf Course is classified in Parks, Preserves, and Open Space.
Brewery properties are classified as Industrial.

**LAND USE ELEMENT
CHAPTER 1**

INTRODUCTION

Table 4. Existing Land Use by Neighborhood (in Acres)

Neighborhood	Residential	Commercial	Industrial	Public and Institutional	Parks, Preserves, and Open Space	Vacant	Natural Resources	Roads, Railroads, and Rights of Way	Total
Airport	151	93	103	1,503	25	262	23	180	2,341
Brewery	10	33	50	96	129	52	-	118	490
Bush Prairie	470	22	10	38	348	253	44	98	1,283
Deschutes	280	5	-	0	316	26	0	85	712
Littlerock	681	88	30	131	102	347	322	197	1,897
Mottman/Black Lake	270	24	174	44	14	135	183	54	899
New Market	44	29	-	216	-	13	-	52	355
SE Capitol Boulevard	318	61	9	56	12	50	-	105	612
SW Tumwater	71	79	68	13	33	379	0	93	736
Trospen	398	7	17	109	33	187	36	65	852
Tumwater Hill	532	28	16	81	136	128	-	224	1,145
Total	3,227	470	477	2,288	1,148	1,183	608	1,273	11,322

2 DESIGNATIONS AND DEFINITIONS

2.1 Introduction

The Land Use Element makes specific recommendations for areas within the eleven neighborhoods within the City. Each neighborhood area chapter contains a map and text identifying specific land use designations for particular areas. The purpose of this chapter is to define each designation and to identify criteria for their use. These definitions and criteria should be used to understand the Land Use Element maps and neighborhood text recommendations. Additionally, these definitions and criteria are meant to be used in conjunction with Chapter 3, Land Use Goals, Policies, and Actions. At the end of this chapter are definitions of the innovative housing and land use methods discussed in the residential land use section of this chapter.

Development within each designation is subject to design review based upon the Citywide Design Guidelines and any applicable subarea design guidelines such as the Brewery District, Capitol Boulevard Community, and Town Center Design Guidelines.

Table 5 shows all of the land use designations that were applied in the Land Use Element. These designations are meant to address all existing land uses and potential land uses that could occur in Tumwater. The number of designations has been kept to a minimum in the interest of simplicity.

**LAND USE ELEMENT
CHAPTER 2**

DESIGNATIONS AND DEFINITIONS

Table 5. Tumwater Land Use Designations

Residential/Sensitive Resource (2-4 Dwelling Units Acre)	Light Industrial
Single Family Low Density (4-7 Dwelling Units /Acre)	Airport Related Industrial
Single Family Medium Density (6-9 Dwelling Units /Acre)	Heavy Industrial
Multi-Family Medium Density (9-15 Dwelling Units /Acre)*	Utilities
Multi-Family High Density (14-29 Dwelling Units /Acre)**	Public and Institutional
Mixed Use	Parks and Open Space
Neighborhood Commercial	Tumwater Town Center
New Market Historic District	Manufactured Home Park
General Commercial	Brewery District
Capitol Boulevard Community	

* – Projects that provide permanently affordable housing dwelling units or other forms of permanently inclusive housing dwelling units in the Multi-Family Medium Density land use designation would be allowed to exceed the maximum density stated in Table 5 up to a new maximum density of 20 dwelling units per acre.

** – Projects that provide permanently affordable housing dwelling units or other forms of permanently inclusive housing dwelling units in the Multi-Family High Density land use designation would be allowed to exceed the maximum density stated in Table 5 up to a new maximum density of 39 dwelling units per acre.

2.1.1 City-Wide Future Land Use Map

The City-Wide Future Land Use Map represents the general future land use patterns that are desired for Tumwater within the 20-year planning period. This chapter, Chapter 3, Land Use Goals, Policies, and Actions, and the policies in each neighborhood chapter will implement the land use patterns on the Land Use Map. The designations and policy recommendations for areas on the maps are based on a number of factors, including:

- The unique physical, social, and economic characteristics in the area.
- The type of existing development.

LAND USE ELEMENT
CHAPTER 2

DESIGNATIONS AND DEFINITIONS

- Existing zoning regulations.
- Ownership patterns.
- The condition of existing structures.
- Subarea, district, and corridor plans previously adopted by the City guide land use patterns within specific areas in Tumwater. These plans include the Littlerock Road Subarea Plan, Brewery District Plan, and Capitol Boulevard Corridor Plan.

The City-Wide Future Land Use Map is meant to be used to evaluate individual land use proposals and is intended to be a guide for both public and private actions affecting the growth and development of Tumwater.

The City-Wide Future Land Use Map is **not** a zoning map. In many cases, more than one zoning district would be consistent with the policy recommendations of a particular land use designation.

Density ranges for the residential land use designations are based on net density. Net density means the total number of dwelling units divided by the net area of the site or area. Net area typically excludes streets, streams, ponds and other water areas, and areas with environmental constraints such as flood plains, wetlands, and steep slopes. Net density can also be defined as developable land. Gross density means the total number of dwelling units divided by the total land area of the site or area with no exclusions. The difference between gross and net density is critical. Roads and parking, both included in gross density, often require up to 20% of a site.

The City-Wide Future Land Use Map is intended to indicate the type of future development that is desired for neighborhood areas, while allowing flexibility for previously approved development. It is important to keep in mind that this plan addresses a twenty-year period. The changes that result from the policy recommendations in this plan will likely take place slowly over time and will result in incremental changes. In other words, these policy recommendations will not result in drastic changes overnight.

The following section of this chapter provides specific definitions for each land use and criteria for their use.

2.2 Residential Uses

**LAND USE ELEMENT
CHAPTER 2**

DESIGNATIONS AND DEFINITIONS

The quality and integrity of Tumwater's residential neighborhoods defines the character of the community and makes it unique. Ensuring that these neighborhoods remain stable and vital is of primary importance. Residential designations in Tumwater should provide a broad range of housing choices to meet the needs of all people in the community.

Residential development in Tumwater should be developed with the following guidelines:

- Residential development should provide for a dynamic mix of housing types to accommodate the many diverse housing needs of the citizens of Tumwater.
- New residential development should provide open spaces. "Wall to wall" development is not acceptable.
- Ensure that housing is compatible in quality, design, and intensity with surrounding land uses, traffic patterns, public facilities, and environmentally sensitive areas.
- Ensure that new residential development promotes a reasonable diversity in housing types.
- Support the stability of established residential neighborhoods.
- Support incentives for housing ownership in addition to rental housing.
- Enhance the appearance of and maintain public spaces in residential areas.
- Promote community involvement to achieve neighborhood improvement.

Some neighborhood-scale commercial uses are appropriate in residential areas to serve the needs of the local neighborhood. These uses may include neighborhood-scale retail uses, personal services, and small professional offices, including residences in conjunction with these businesses. These uses should be allowed in all residential zones except those designated Residential and Sensitive Resource. These uses should only be allowed as conditional uses to ensure that the uses demonstrate compatibility with the existing neighborhood.

Compatibility should be achieved using buildings that are sized and designed to be residential in scale; small overall area devoted to neighborhood-scale commercial use;

**LAND USE ELEMENT
CHAPTER 2**

DESIGNATIONS AND DEFINITIONS

and design and layout, which screens residential areas from excessive noise, lights, storage, and parking areas. These uses should be oriented primarily towards pedestrian and bicycle use. Uses, which would result in excessive automobile traffic, should be discouraged, such as gas stations, drive-thru restaurants.

Most neighborhood-scale commercial areas serving a particular neighborhood will consist of one business. However, new neighborhood-scale commercial uses may be considered in areas where one or more such uses already exist. In those cases, additional businesses should be located adjacent to the existing business in small clusters to avoid the development of commercial strips or many small businesses strung out along transportation corridors.

Mobile and manufactured home parks, which were legally established prior to adoption of this plan, should have the “Manufactured Home Park” designation applied to them in order to ensure a sufficient supply of land for manufactured homes in parks.

Several designations for residential land use in Tumwater were developed in order to meet the goals of the Growth Management Act, the Land Use Element, and the Housing Element. Each of these designations has specific criteria and characteristics related to development in each designation.

Table 6. Range of Dwelling Units per Acre by Land Use Designation and Zone District

Land Use Designation	Implementing Zone District	Dwelling Units Per Acre
Residential/Sensitive Resource	• Residential/Sensitive Resource	2-4 Dwelling Units/Acre
Single Family Low Density	• Single Family Low Density	4-7 Dwelling Units/Acre
Single Family Medium Density	• Single Family Medium Density	6-9 Dwelling Units/Acre
Multi-Family Medium Density	• Multi-Family Medium Density	9-15 Dwelling Units/Acre*
Multi-Family High Density	• Multi-Family High Density	14-29 Dwelling Units/Acre**
Manufactured Home Park	• Manufactured Home Park	6-9 Dwelling Units/Acre
Mixed Use	• Mixed Use	Minimum 14 Dwelling Units/Acre

**LAND USE ELEMENT
CHAPTER 2**

DESIGNATIONS AND DEFINITIONS

Land Use Designation	Implementing Zone District	Dwelling Units Per Acre
Capitol Boulevard Community	<ul style="list-style-type: none"> Capitol Boulevard Community 	Minimum 30 Dwelling Units/Acre or less, depending on subsection
Brewery District	<ul style="list-style-type: none"> Brewery District 	8-20 Dwelling Units/Acre
Tumwater Town Center	<ul style="list-style-type: none"> Town Center 	Minimum 30 Dwelling Units/Acre or less, depending on subsection

* – Projects that provide permanently affordable housing dwelling units or other forms of permanently inclusive housing dwelling units in the Multi-Family Medium Density land use designation would be allowed to exceed the maximum density stated in Table 6 up to a new maximum density of 20 dwelling units per acre.

** – Projects that provide permanently affordable housing dwelling units or other forms of permanently inclusive housing dwelling units in the Multi-Family High Density land use designation would be allowed to exceed the maximum density stated in Table 6 up to a new maximum density of 39 dwelling units per acre.

2.2.1 Residential/Sensitive Resource (2-4 Dwelling Units/Acre)

The purpose of this designation is to recognize areas of unique open space character and sensitivity to environmental disturbance such as around stream corridors, lakes, and wetlands within the city limits and Tumwater's Urban Growth Area.

Residential/Sensitive Resource areas are intended to be used only for exceptional places within the City and its Urban Growth Area. This designation should be applied to areas that are not protected by the Shoreline Management Act and are not already built out. These areas are where intensive urban development would adversely affect ground or surface waters or environmental resource areas.

In addition to being of a relatively low density, development in these areas should be clustered. Clustering means grouping or "clustering" development onto part of a property so that the remainder can be preserved as unbuilt open space. The intent of clustering development in this area is to preserve open space along environmentally sensitive areas and provide a lot configuration that allows for the preservation of the specified amount of open space and also allows for future applied density to be achieved over the 20-year time period.

In addition to clustering, other methods of preserving open space shall be strongly encouraged to guide development into less sensitive portions of the land, such as

**LAND USE ELEMENT
CHAPTER 2**

DESIGNATIONS AND DEFINITIONS

purchase or donation, easements or deed restrictions, covenants, land exchanges, and transfer of development rights as a method of preserving open space. Densities in this designation should be two to four dwelling units/acre.

In order to protect groundwater resources from contamination by failing septic tanks and to ensure that urban services can be provided to certain areas in a cost efficient manner, a minimum density policy of two dwelling units/acre is recommended.

It is not the intent of this policy to prohibit construction on lots larger than are required for minimum density. What is important is that the property has the capacity to be developed at the minimum density in the future.

For example: If a property owner proposes to construct a house on a five-acre lot and the minimum density is two dwelling units per acre (one-half acre lots), they would not be prohibited from doing so. However, the house must be sited on the five-acre lot such that other houses could be built on the site in the future if needed.

Soils and other natural systems should be capable of supporting densities of up to four dwelling units per acre with urban services without resulting in the degradation of sensitive areas such as stream corridors, lakes, and sensitive aquifers.

The full range of urban services should be available or be planned in the near future in accordance with the City's Lands for Public Purposes Element and Capital Facilities Plan.

Construction activities in areas assigned this designation should only occur in the drier months of the year in order to protect Percival Creek from sedimentation and construction-associated runoff.

Density transfer in the Planned Unit Development overlay zoning district is not appropriate in this designation due to the extreme sensitivity of the area to environmental disturbance.

Accessory units should be permitted in this designation within the permitted density on lots with sewer connections, except where the Health Department has approved septic systems. Accessory units will provide affordable housing and extra income for homeowners.

Where clustering is used, it should be applied in the following manner in areas with this designation:

- Clustering is recommended for development proposals in the Residential/

Sensitive Resource designation.

- Open space preserved through clustering should be at least 30% of the gross area of the site. Of this 30%, at least half should be useable for passive recreational purposes. Passive recreational uses include activities such as hiking, bicycling, horseback riding, and fishing; and areas that provide access to shorelines and other recreational uses. If half (50%) of the 30% preserved for open space on a lot or development proposal is not useable for passive recreational purposes, then an additional amount of open space should be set aside to make the amount of area usable for passive recreational purposes. This should be equal to the amount of open space area that is not useable for passive recreational purposes.

Designated manufactured housing should be permitted on single lots in this designation.

2.2.2 Single Family Low Density (4-7 Dwelling Units/Acre)

The density of new development in the Single Family Low Density designation should be averaged over the entire site in order to reach the maximum densities required to accommodate future population. It is not the intent of the City to require that lots be of a specific size but that densities are met as an average of the overall site.

Clustering should be considered in this residential designation to protect sensitive areas yet still accommodate residential development.

Designated manufactured housing should be permitted on single lots in this designation.

Accessory units should be permitted in this designation within the permitted density on lots with sewer connections, except where the Health Department has approved septic systems. Accessory units will provide affordable housing and extra income for homeowners.

Single-family dwellings and duplexes should be permitted in this designation subject to Citywide Design Standards.

2.2.3 Single Family Medium Density (6-9 Dwelling Units/Acre)

The density of new development in the Single Family Medium Density designation should be averaged over the entire site in order to reach the maximum densities required to accommodate future population. It is not the intent of the City to require

**LAND USE ELEMENT
CHAPTER 2**

DESIGNATIONS AND DEFINITIONS

that lots be of a specific size but that densities are met as an average of the overall site.

It is envisioned that underlying zoning in this designation would permit innovative housing techniques such as attached single family, alley houses, z-lot, and alternate width lot housing. In order for these techniques to be used, there must be mechanisms to ensure neighborhood compatibility and design quality. Some of the innovative techniques that could be used in this designation include small single-family housing with alleys and zero lot line or Z-lot developments.

Clustering should be considered in this residential designation to protect sensitive areas yet still accommodate residential development.

Accessory units should be permitted within the permitted density in this designation to provide affordable housing and extra income for homeowners.

Duplexes should be permitted in this designation subject to design standards. Designated manufactured housing should be permitted on single lots in this designation.

This residential designation should provide a mix of housing types in order to provide affordable housing and ensure neighborhood stability.

2.2.4 Multi-Family Medium Density (9-15 Dwelling Units/Acre)*

The density of new development in the Multi-Family Medium Density designation should be averaged over the entire site in order to reach the maximum densities required to accommodate future population. It is not the intent of the City to require that lots be a specific size but that densities are met as an average of the overall site.

Detached Single Family housing could be provided in the Multi-Family Medium Density designation as long as the overall site meets the density goals of the designation. The intent of this policy is to ensure diversity in housing types in these areas. This residential designation is meant to provide primarily for multi-family condominium and apartment types of structures.

Clustering should be considered in this residential designation to protect sensitive areas yet still accommodate residential development.

Accessory units should be permitted in this designation within the permitted density to provide affordable housing and extra income for homeowners.

Designated manufactured housing should be permitted on single lots in this

**LAND USE ELEMENT
CHAPTER 2**

DESIGNATIONS AND DEFINITIONS

designation.

Manufactured home parks are permitted in the Multi-Family Medium Density Residential designation subject to City standards and site plan review by the Hearing Examiner.

Additionally, Multi-Family Medium Density designated areas should be accompanied by open space, environmental protection for sensitive areas and mass transit linkage in order to make these higher densities viable and compatible with the community.

* – Projects that provide permanently affordable housing dwelling units or other forms of permanently inclusive housing dwelling units in the Multi-Family Medium Density land use designation would be allowed to exceed the maximum density stated in Tables 5 and 6 up to a new maximum density of 20 dwelling units per acre

2.2.5 Multi-Family High Density (14-29 Dwelling Units/Acre)*

The Multi-Family High Density designation should be applied in areas that are planned-for major transportation corridors and areas adjacent to the city center. The density of new development in the Multi-Family High Density designation should be averaged over the entire site in order to reach the maximum densities required to accommodate future population. It is not the intent of the City to require that lots be of a specific size but that densities are met as an average of the overall site.

Clustering should be considered in this residential designation to protect sensitive areas yet still accommodate residential development.

Accessory units should be permitted in this designation only in areas of existing lower density single-family development. Minimum density requirements would preclude accessory units within new development in this designation.

Multi-Family High Density designated areas should be accompanied by significant open spaces, environmental protection for sensitive areas and mass transit linkage in order to make these higher densities viable and compatible with the community.

* – Projects that provide permanently affordable housing dwelling units or other forms of permanently inclusive housing dwelling units in the Multi-Family High Density land use designation would be allowed to exceed the maximum density stated in Tables 5 and 6 up to a new maximum density of 39 dwelling units per acre.

**LAND USE ELEMENT
CHAPTER 2**

DESIGNATIONS AND DEFINITIONS

2.2.6 Manufactured Home Park (6-9 Dwelling Units/Acre)

The Manufactured Home Park (MHP) land use designation is intended to ensure consistency with RCW 36.70A.070(2)(c) which requires sufficient land be available for all types of housing including manufactured housing.

Manufactured home parks are permitted in this designation subject to City development standards and site plan review by the Hearing Examiner.

Designated manufactured housing should be permitted on pre-existing single lots of record in this designation.

This residential designation should help to provide sufficient land for manufactured housing in manufactured home parks and ensure neighborhood stability.

Uses that are incompatible or inconsistent with the goal of protecting and preserving manufactured home parks should not be allowed.

Manufactured Home Park designated areas should be accompanied by open space and environmental protection for sensitive areas in order to make these areas compatible with the community.

Subdivision and platting of properties for residential purposes, including condominiums, should not be allowed.

Additionally, these areas should be located along or near mass transit linkages and close to urban services.

Table 7 provides a summary of innovative land use techniques that are recommended to be used in each residential designation.

**LAND USE ELEMENT
CHAPTER 2**

DESIGNATIONS AND DEFINITIONS

Table 7. Land Use Management Techniques for Residential Development

	Residential / Sensitive Resource 2-4 Dwelling Units/Acre	Single Family Low Density 4-7 Dwelling Units/Acre	Single Family Medium Density 6-9 Dwelling Units/Acre	Multi- Family Medium Density 9-15 Dwelling Units/Acre *	Multi- Family High Density 14-29 Dwelling Units/Acre **
Design Review	X	X	X	X	X
Revised Development Standards	X	X	X	X	X
Minimum Average Density	X	X	X	X	X
Clustering	X	X	X	X	X
Manufactured Homes on single lots	X	X	X	X	

* – Projects that provide permanently affordable housing dwelling units or other forms of permanently inclusive housing dwelling units in the Multi-Family Medium Density land use designation would be allowed to exceed the maximum density stated in Tables 5 and 6 up to a new maximum density of 20 dwelling units per acre.

** – Projects that provide permanently affordable housing dwelling units or other forms of permanently inclusive housing dwelling units in the Multi-Family High Density land use designation would be allowed to exceed the maximum density stated in Tables 5 and 6 up to a new maximum density of 39 dwelling units per acre.

2.3 Mixed Use (Residential Minimum 14 Dwelling Units/Acre)

It is the intent of the Mixed Use designation to have a mixture of commercial and residential uses in close proximity. Mixed-use can include but is not limited to mixed-use buildings with retail or office uses on the first floor and residential above.

The Mixed Use designation provides an opportunity to develop areas in Tumwater that are transit oriented and pedestrian friendly while still accommodating

**LAND USE ELEMENT
CHAPTER 2**

DESIGNATIONS AND DEFINITIONS

automobiles, support small businesses and consumers, and provide affordable housing and quality community design. With architectural design and creative site planning, it is very possible to provide dwelling units that are mixed in with commercial uses.

However, it is not enough to allow a mixing of uses. Land use regulations and zoning need to be altered to encourage mixed-use development. New models of mixed-use development require a finer grain of mixture to encourage walkability and vitality. Such development concepts as urban villages, pedestrian pockets, and neo-traditional neighborhood design rely heavily on a mixture of uses to be successful.

Residential densities in the Mixed Use designation should be a minimum of 14 dwelling units per acre. It is expected that these densities will be difficult to reach in the near term. However, it is in the best interest of the citizens of Tumwater that the City move in the direction of reaching these goals by the end of the 20-year planning period.

Mixed-use areas, when developed with design and development guidelines have characteristics that include:

- Transit orientation that lessens traffic impacts by providing ready access to mass transit and provides places to work and shop adjacent to living spaces, thus lessening the need to drive;
- The provision of affordable housing by providing more building lots available to develop at a lower cost;
- A pedestrian friendly environment due to well-designed streets, parks, and public open spaces; and
- The provision of a sense of community and place due to quality community design.

Areas designated Mixed Use should be developed with design and development guidelines that promote quality community design. Design and development guidelines can supplement zoning codes. Incompatible uses such as industrial, warehousing and distribution, chemical handling, and those uses that generate significant noise or are heavily truck dependent should not be permitted in mixed-use areas.

Mixed-use areas should be dense and compact. The close proximity of employment, residential and commercial activities, and public uses will provide residents and

**LAND USE ELEMENT
CHAPTER 2**

DESIGNATIONS AND DEFINITIONS

workers a realistic and convenient choice of walking or cycling to work, home, or shopping, thus lessening dependence on the automobile.

Integral to the success of mixed-use areas will be good urban design. Urban design not only refers to the appearance and attractiveness of development, but also to its function. It is important that there be well-designed buildings to maintain compatibility with surrounding development, as well as site design that provides for pathways, open community spaces, and other connecting features that facilitate easy access between developments and inspire a sense of unity.

In order to ensure that mixed-use development occurs where it is desired, the City should consider providing incentives for development

These could include:

- Development of detailed area master plans that address the following:
 - Location, type and size of land use
 - Targeted residential densities
 - Street improvements
 - Location and amounts of off-street parking
 - Public incentives for development in focus areas
 - Parks and open spaces
 - Phasing plan for capital improvements
- Master plans should use site plans, eye level and aerial perspectives, street sections, elevations, and text to illustrate key concepts.
- Development of a process for coordinating multiple property ownerships in order to provide consistent development and open space in large enough areas as to be useful.
- Parking standards should be reduced in recognition of the efficiencies of mixed-use development and benefits to stormwater management.
- Develop creative funding mechanisms to finance capital improvements

**LAND USE ELEMENT
CHAPTER 2**

DESIGNATIONS AND DEFINITIONS

and housing such as local improvement districts, public/private partnerships, housing funds, targeted capital facility funds, and impact fees.

- Identify focus areas within areas designated mixed-use that:
 - Build on existing strengths and magnets, or create new ones.
 - Group new development to get maximum benefit from public and private improvements or investment.
 - Designate focus areas as a priority for street improvements and other capital facilities.
- If focus areas are identified within areas designated mixed-use, the City could plan for the use and timing of public incentives in focus areas. Some incentives that could be considered include:
 - Prepare site plans for focus areas that specify uses, development patterns, and improvements so that development can be expedited.
 - Identify, prioritize, and phase specific public street improvements in the Lands for Public Purposes Element and Capital Facilities Plan.
 - Conduct environmental review for focus areas so issues are resolved and individual development permits can go forward more quickly.
 - Acquire parks and open space (if included).
 - Build transit improvements.
 - Waive or share impact fees for low-income residential development.
 - Market master plans for focus areas to the development community.

Experiences from other successful communities suggest that aggressive marketing of focus areas by jurisdictions is needed for areas to redevelop as envisioned. If the

zoning and master plan process has been completed with interest group involvement many of the concerns about development in the area should have already been answered.

2.4 Neighborhood Commercial

Some non-residential uses, such as neighborhood-scale retail uses and personal services, are appropriate in residential areas when they serve the needs of the local neighborhood. The Neighborhood Commercial designation would allow neighborhood scale retail uses, personal services and professional offices in residential areas where local demand, community support, and design solutions demonstrate compatibility with the neighborhood. These uses should be limited specifically to neighborhood retail zoning districts.

Areas designated Neighborhood Commercial should be of a low intensity and minimally affect adjacent residential areas. Neighborhood Commercial areas should provide a buffer area between adjacent residential uses. This buffer should consist of landscaping and sound barriers. Uses that produce nuisances such as light and glare, and excessive noise and traffic should be discouraged. This buffer should also allow for bicycle and pedestrian access to encourage the use of adjacent services without requiring a car trip.

2.5 New Market Historic District

The Historic Commercial designation is applied in a limited area in Tumwater that includes the Tumwater Historical Park, the Tumwater Falls Park, and the site of the Old Tumwater Brewhouse on the east side of the Deschutes River. The center point of this area is the Old Tumwater Brewhouse. The New Market Historic District Master Plan was adopted by the City Council in November of 1993. The plan includes input from the public and experts in the field of historic area design, and elements or provisions addressing aesthetics, vegetation, fish and wildlife habitat, historic and prehistoric archeological significance, public access, environmental sensitivity, architecture and community design, traffic and public education. The plan is sufficiently detailed to determine whether specific proposed structures, uses, and structural revisions are in accordance with the purposes and intent of the District.

All development that occurs in the area designated Historic Commercial is subject to the standards and recommendations of the Master Plan.

2.6 General Commercial

The intent of the General Commercial designation is to support and implement the

goals of the Tumwater Economic Development Element, which was adopted in 1990. Among these goals are the establishment of a new commercial center for Tumwater, the preservation of areas for commercial facilities, which make use of the close proximity to Interstate 5, and minimizing the undesirable impacts of such uses on the residential neighborhoods, which they serve.

The General Commercial designation has been used primarily in areas that were previously zoned Commercial Development (CD) although other commercial areas not zoned CD also received the designation. The General Commercial (GC) zoning designation, that replaced the CD zoning designation in 1995, should be the basis for implementing zoning in areas that are designated General Commercial.

To ensure commercial development that is compatible with surrounding uses and the general character of the community architectural and landscaping design and development guidelines should apply to commercial development.

Consideration could be given to allowing mixed-use structures in this designation in order to promote development that provides affordable housing, has a transit orientation, is pedestrian friendly, has community open space, and provides a sense of community due to quality design.

2.7 Capitol Boulevard Community

It is the intent of the Capitol Boulevard Community designation to provide for a broad spectrum of compatible, mutually supporting uses in close proximity. Over time, areas with this land use designation are envisioned to change from strip commercial development and other low-intensity or non-pedestrian oriented uses incrementally into a mixed-use, pedestrian, auto, and transit oriented corridor.

The Capitol Boulevard Community designation is intended to foster development that:

- Creates vibrant places and increases business activity, especially for pedestrian oriented businesses;
- Increases security;
- Promotes efficient use of facilities;
- Encourages a variety of businesses, especially those that appeal to pedestrians and serve the needs of the surrounding neighborhood;
- Balances all modes of transportation by increasing access for

pedestrians, bicycles, and transit and by providing commercial services, recreation facilities, and employment opportunities near to residences, thus lessening the need to drive;

- Provides affordable housing by reducing development costs and encouraging a greater variety of housing options;
- Creates a pedestrian and bicycle-friendly environment with well-designed streets and public open spaces; and
- Provides a sense of community and place with quality community design.

In order to implement the goals, policies, and actions of this land use designation, matching zoning and special design guidelines need to be adopted as well. The Capitol Boulevard Corridor Plan should be referenced for more in depth guidance on this particular land use designation.

2.8 Brewery District

The intent of the Brewery District land use designation is to create a multi-modal activity center. Over time, areas with this land use designation will transform from a largely auto-oriented commercial node into a lively, walkable, and economically vibrant neighborhood center with a mixture of housing and neighborhood-serving businesses in accordance with the Brewery District Plan, Economic and Strategic Plans, and the Final Report for the Community Visioning Project for the Former Olympia Brewery.

The Brewery District designation is intended to foster development that:

- Creates a stronger sense of place by facilitating pedestrian access, establishing gathering places for residents, and fostering a distinct District identity;
- Improves transportation options, safety, and access within and across the District;
- Expands economic opportunity and activity; and
- Improves the function and appearance of the built environment; and
- Guides redevelopment of the former brewery site and integration into

the surrounding neighborhood.

In order to implement the goals, policies, and actions of this land use designation, matching zoning and special design guidelines will be adopted. The Brewery District Plan should be referenced for more in depth guidance on this particular land use designation.

2.9 Light Industrial

To augment the role of industry in Tumwater's future, it is necessary to provide a reasonable supply of land for a variety of uses consistent with the policies of the Tumwater Economic Development Element. The Light Industrial designation provides for the location of a broad array of activities, including manufacturing, wholesale trade, and distribution activities. The purpose of the Light Industrial designation is to provide lands for industrial development that will allow for attraction of new industries and expansion of existing ones while maintaining a high quality environment.

Industrial uses should be grouped on a variety of parcel sizes in order to provide coordinated development and sharing of facilities and services. Light industrial areas should also have controls to establish compatibility with surrounding non-industrial development and to protect from nuisance-creating occurrences such as noise, dust, odor, vibration, and air and water pollution. Additionally, areas designated Light Industrial in Tumwater should follow the recommendations and regulations of the North Thurston Groundwater Protection Plan.

Light industrial areas need to be located within reasonable access to truck routes, rail, freeway, or air routes. Similarly, public sewer, water, and storm drainage either should be presently available or should be easily provided during the development process.

2.10 Airport Related Industrial

The Airport Related Industrial designation is meant to support aviation and industrial related uses at the Olympia Regional Airport and to reflect the unique land use activities of the Airport and associated areas. The Airport Related Industrial designation will support the land use activities permitted in the existing Airport Related Industry zone and discourage incompatible uses and heights.

2.11 Heavy Industrial

The Heavy Industrial designation recognizes the need for heavy industrial uses in

**LAND USE ELEMENT
CHAPTER 2**

DESIGNATIONS AND DEFINITIONS

certain areas of Tumwater in order to provide needed materials, goods, and services to ensure the economic vitality of the City and the region.

Heavy industrial uses include but are not limited to chemical processing, mining, and mineral extraction. The Jones Rock Quarry is an example of heavy industrial use in Tumwater. Heavy industrial uses may have impacts that are difficult to control such as heavy truck traffic, noise, vibration, light, glare, or odors. Heavy industrial areas should be separated from residential and commercial uses by such methods as vegetative or lighter intensity land use buffers and should also have controls to establish compatibility with surrounding non-industrial development and to protect from nuisance-creating occurrences such as noise, dust, odor, vibration, and air and water pollution. Additionally, areas designated Heavy Industrial in Tumwater should follow the recommendations and regulations of the North Thurston Groundwater Protection Plan.

2.12 Utilities

The Utilities designation includes those areas of land devoted to the transport and provision of utilities such as electricity, natural gas, telephone, and other utilities. Most of the areas receiving this designation in Tumwater are electrical utility easements. Utilities such as natural gas, telephone, and other utilities can be provided within areas designated for other land uses in ways that are compatible with other land uses. Utilities areas are also often compatible with path and trail connections. The Tumwater Utilities Element should be referenced for specific recommendations and information on utility provision in Tumwater.

2.13 Public and Institutional

The Public/Institutional designation recognizes those parcels and facilities currently in or planned for public ownership where their primary function is to provide public services. The intent of this designation is to assure continuation and potential expansion of acreage, facilities, and services at levels consistent with population requirements, and achieved in a manner that is compatible with surrounding land uses. Public institutional uses include but are not limited to schools, fire stations, police stations, general government buildings, libraries, hospitals, and cemeteries. Uses permitted within the Public and Institutional designation should be based upon the Community Services (CS) zone that was developed through the Economic Development Element.

2.14 Parks and Open Space

The Parks and Open Space designation is meant to support and implement the Parks,

**LAND USE ELEMENT
CHAPTER 2**

DESIGNATIONS AND DEFINITIONS

Recreation, and Open Space Plan (Element). The Parks and Open Space designation accommodates public recreational pursuits, retains views and historical features, or preserves land in essentially a natural and open state. It also provides for continuation of agricultural uses. A site may also provide for or contain support uses consistent with community needs, provided there is appropriate opportunity for public review and comment.

Areas designated Parks and Open Space include developed active parks, privately operated parks, designated open space, flood plains, areas of steep slopes or other physical constraints, golf courses, delineated wetland areas and lakes not under shoreline jurisdiction, and watershed areas.

Specific recommendations for many Parks and Open Space designated areas are contained in the Parks, Recreation, and Open Space Plan (Element).

2.15 Tumwater Town Center

This designation is intended to provide for a mix of public and privately owned developments that will realize Tumwater's vision of a new city center. It is envisioned to include state and local government facilities; private commercial developments of office, retail, and service businesses; residential; educational; civic services; support facilities and services, such as childcare; and public assembly facilities and outdoor spaces.

The Tumwater Town Center is located within Tumwater and is generally bordered by I-5, Tumwater Boulevard, Nicholas Street, and Israel Road.

Development within this designation should occur in a manner that is consistent with the goals and policies of this comprehensive plan, design guidelines, and street standards adopted for this area.

2.16 Design Review

The City is, for the most part, a designed environment. Design will influence the degree to which development is attractive and appealing, comfortable and safe, compact, efficient, encourages natural and social interaction, provides most needs within short distances, discourages environmentally disruptive influences, and is well connected with other areas. Greater awareness and appreciation of the value of design will continue, and the demand for development that demonstrates design excellence will increase.

This trend and the movement to plan comprehensively will create new partnerships

**LAND USE ELEMENT
CHAPTER 2**

DESIGNATIONS AND DEFINITIONS

to achieve community goals. Public participation and interest in design will continue to increase with greater emphasis on design in City projects. With increasing density in some areas, design will become an important factor in providing stylistic compatibility and privacy.

The Design Guidelines complement the City's zoning code and provide a better tool for ensuring lasting value. Unlike zoning codes that can be prohibitive and exclusionary in their tone and language, Design Guidelines are illustrative and prescriptive.

They have proved very effective in promoting well designed, mixed-use, new and infill development.

The intent of design review in Tumwater is to create design and development guidelines that ensure lasting value through:

1. Infill and strengthening existing neighborhoods;
2. Livable neighborhoods;
3. Affordable housing;
4. Diversity in housing types and styles; and
5. Streetscape design as well as building and site design.

The Design Guidelines establish a context for development and encourage resolution of technical planning and urban design issues such as pedestrian and traffic circulation, stormwater runoff, landscaping and buffering, and building location and design.

Functions of Design Review through design and development guidelines:

1. Establishes a community design context;
2. Creates community planning and urban design policy;
3. Assures conformance to City plans and policies; and
4. Expedites project approval.

The design review process includes elements such as:

1. The appearance or image of a community
2. Street layout and design
3. Incorporating transit
4. Natural and scenic resources
5. Streetscape
 - Street character and liveliness
 - Pedestrian environment
 - Landscape design
 - Residence and street transition
6. Site Planning
 - Neighborhood character
 - Adjacent properties
 - Siting
 - Natural elements
 - Transit facilitation
7. Building Design
 - Architectural character
 - Character and massing
 - Architectural elements
 - Exterior finish materials
 - Parking garages

- Mixed-use buildings
- Conversions and additions
- Special needs housing

Design review is necessary in Tumwater to ensure that new development is compatible with existing neighborhoods; to provide guidelines for innovative land use management techniques; and to provide guidelines for special areas of the City.

Design Guidelines were developed as a follow on implementing ordinance for the remaining areas of the City after consultation with affected groups including citizens, builders, and City staff. Design standards were developed through a process involving substantial public participation.

The goals and purpose of the Design Guidelines in Tumwater are to:

- Encourage the development of visually sensitive developments;
- Encourage developments that will contribute to the stability and integrity of a safe and attractive neighborhood;
- Recognize that aesthetic considerations along with environmental review contribute toward an enhanced environment; and
- Recognize that aesthetic considerations are appropriate in order to protect property values of adjacent properties and to ensure that developments contribute to desirable neighborhood character.

2.17 Maximum and Minimum Densities

Minimum densities should be applied to all areas of the City in order to promote more cost-efficient provision of City services, the provision of affordable housing and the encouragement of transportation modes other than the single occupancy vehicle. Proposed development at less than the minimum density permitted should not be allowed.

2.18 Clustering

Cluster development is characterized by small pockets of more intense development, surrounded by open space. Although the development is more compact, gross density

does not increase. The advantages of cluster development are many: more efficient and less expensive provision of services; reduced transportation costs; the protection of open space and sensitive areas; and lower land development costs.

The main purpose of clustering in Tumwater would be to protect and preserve sensitive areas in accordance with the Conservation Element. Clustering is presently permitted in Tumwater because of the Conservation Element. It should be encouraged wherever it is necessary to protect sensitive areas in all residential designations. Examples of clustered building types include Z-lot developments, attached single family or row houses, coach homes, stacked townhouses, and townhouse mews.

2.19 Modular and Manufactured Housing

In accordance with state law, manufactured homes should be allowed anywhere that site built single-family homes are allowed.

It is the intent of this plan to promote the designation of a sufficient supply of land for traditional mobile or manufactured home parks and to recognize that modular and manufactured housing on single family lots and in manufactured home parks is a viable form of housing construction.

2.20 Innovative Housing and Urban Planning Approaches Promoting Physical Activity

The following provides detailed descriptions of the previously mentioned innovative land use techniques. Some of these descriptions, such as design review and revision of Development Standards, also apply to non-residential designations.

The intent of encouraging innovative housing and urban planning approaches that promote physical activity is to ensure a diverse and dynamic mixture of housing types in the City. Present development patterns do not address all of the housing needs of the community and are generally car dependent. Most new residential development that takes place is either very small multi-family units or very large expensive Single Family houses on large lots. In order to address this problem, new residential development in Tumwater should:

- Create a sense of place, of neighborhood, and of community that builds on what is locally unique and enduring to replace the anonymity and urban and suburban sprawl.
- Provide a denser, richer, and more equitable mixture of land uses,

**LAND USE ELEMENT
CHAPTER 2****DESIGNATIONS AND DEFINITIONS**

household types, building types, and socioeconomic groups.

- Provide infrastructure to increase walking, biking, and public transit to reduce dependence on the automobile wherever possible.
- Create compact communities that are built to preserve open space and natural systems and habitats.

3 LAND USE GOALS, POLICIES, AND ACTIONS

3.1 Introduction

This chapter of the Land Use Element specifies goals, policies, and actions meant to set forth a direction for the future growth of Tumwater 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. Finally, the action items implement certain recommendations within the Land Use Element. The goals, policies, and actions should be looked at in conjunction with Chapter 2, Designations, and Definitions. The two chapters are meant to work together as a whole.

3.2 Goals, Policies, and Actions

GOAL LU-1: Ensure the Land Use Element is implementable and coordinated with all applicable City plans and the plans of other jurisdictions in the Thurston region.

<u>Policy</u>	<u>Action</u>
LU-1.1	Ensure the Land Use Element is consistent with adopted County-Wide Planning Policies and integrate transportation considerations into land use decisions, and vice versa.
	LU-1.1.1 Implement the eleven County-Wide Policy elements in the County-Wide Policy Plan (Reference Appendix B: County-Wide Planning Policies).
LU-1.2	Ensure the Land Use Element is consistent with the goals of Sustainable Thurston.
	LU 1.2.1 Implement specific Sustainable Thurston goals identified in Land Use Element Section 1.6, Sustainable Thurston Goals (Reference Appendix C: Sustainable Thurston)
LU-1.3	Engage in planning on a neighborhood level with residents of the City (Reference Appendix A: Neighborhood Appendix)
LU-1.4	Encourage the creation of a new city center that is compatible with the Land Use Element.

**LAND USE ELEMENT
CHAPTER 3**

GOALS, POLICIES, AND ACTIONS

- | | |
|-----------|---|
| LU-1.5 | Coordinate the Land Use Element with the <i>Port of Olympia Master Plan</i> (2016). |
| LU-1.6 | Ensure consistency between the Land Use Element and Tumwater Historic District Master Plan. |
| LU-1.7 | Coordinate the Land Use Element with the Shoreline Master Program. |
| LU-1.7.1 | Make sure the Land Use Element is consistent with the recommendations of the Shoreline Master Program. |
| LU-1.8 | Coordinate the Land Use Element with the City's Economic Development Element. |
| LU-1.8.1 | Implement goals and associated policies and actions of the Economic Development Element. |
| LU-1.9 | Ensure consistency between the Land Use Element and the Tumwater Zoning Code. |
| LU-1.9.1 | Implement the Land Use Element by revising the Zoning Code and other municipal Codes to reflect the goals, policies, actions, and designations outlined in the Land Use Element. |
| LU-1.10 | Coordinate the Land Use Element with the City's Lands for Public Purposes Element and the Capital Facilities Plan. |
| LU-1.10.1 | Implement low impact development through land use and stormwater planning. |
| LU-1.11 | Make capital budget decisions consistent with the comprehensive plan in accordance with RCW 36.70A.120 (Reference the City's current six-year Capital Facilities and Transportation Improvement Plans). |
| LU-1.12 | Coordinate the Land Use Element with local, state, and national initiatives that support the City's vision whenever practical to increase the chance of additional funding. |
| LU-1.13 | Coordinate the Land Use Element with the strategies in the City of Tumwater Housing Action Plan. |

**LAND USE ELEMENT
CHAPTER 3**

GOALS, POLICIES, AND ACTIONS

LU-1.14 Coordinate the Land Use Element with the strategies in the most recent version of the Thurston Climate Mitigation Plan.

GOAL LU-2: Ensure development takes place in an orderly and cost-efficient manner in order to best utilize available land and public services, conserve natural resources, protect critical areas, preserve open space, and reduce sprawl.

Policy Action

LU-2.1 Encourage the highest intensity growth to locate within the City's corporate limits.

LU-2.1.1 Implement goals and associated policies and actions of the Economic Development Element. (Reference Goal LU-1.8.1)

LU-2.2 Reduce inappropriate conversion of undeveloped land into sprawling low-density development.

LU-2.2.1 Ensure the eleven County-Wide Policy elements in the County-Wide Policy Plan are implemented. (Reference Goal LU-1.1.1)

LU-2.3 Encourage innovative land use management techniques such as density bonuses, cluster housing, zero-lot-line development, planned unit developments, and transfer of development rights to create vibrant centers, corridors, and neighborhoods while accommodating growth.

LU-2.3.1 Consider revision of the City's Development Standards to encourage innovative land use management techniques.

LU-2.4 Ensure new annexations adhere to the goals and policies of the City's Annexation Policy.

LU-2.5 Encourage development of architectural and landscape design standards.

LU-2.5.1 Implement Goals 5 and 6 of the Economic Development Element.

LU-2.6 Ensure the City's capital budget decisions in the City's current six-year

**LAND USE ELEMENT
CHAPTER 3**

GOALS, POLICIES, AND ACTIONS

Capital Facilities and Transportation Improvement Plans are coordinated with the Land Use Element, Lands for Public Purpose Element, and Transportation Element.

LU-2.7 Create vibrant city centers and activity nodes along transit corridors that support active transportation and housing, jobs, and services.

LU-2.8 Create safe and vibrant neighborhoods with places that build community and encourage active transportation.

LU-2.9 Protect designated mineral resource lands from incompatible development.

LU-2.10 Reduce the City's carbon footprint where possible and move towards a carbon-neutral community.

GOAL LU-3: Ensure adequate public services, facilities, and publicly owned utilities are available to proposed and existing development.

Policy Action

LU-3.1 Coordinate development with the City's six-year Capital Facilities Plan.

LU-3.1.1 Ensure the Capital Facilities Plan can be implemented through the Land Use Element's projected densities and the direction found in the Lands for Public Purposes Element.

LU-3.2 Ensure development is in conformance with the Water System Plan and Sanitary Sewer Comprehensive Plan.

LU-3.3 Analyze all proposed development for anticipated impact on services, either as an element of site plan review or as part of an environmental impact assessment.

LU-3.4 Give preference to providing adequate public facilities to settled areas rather than extending new services to sparsely settled or undeveloped areas and to serving incorporated land before serving unincorporated areas.

LU-3.4.1 Ensure the eleven County-Wide Policy elements in the County-Wide Policy Plan are implemented. (Reference

**LAND USE ELEMENT
CHAPTER 3**

GOALS, POLICIES, AND ACTIONS

Goal LU-1.1.1)

LU-3.5 Work with developers to determine where and when new public facilities are to be placed to permit proper development of commercial and residential projects. This process should be directly related to the Lands for Public Purposes Element, the Capital Facilities Plan, and site plan review in order to achieve concurrency.

LU-3.5.1 Ensure the eleven County-Wide Policy elements in the County-Wide Policy Plan are implemented. (Reference Goal LU-1.1.1)

LU-3.6 Require residential and commercial development utilizing septic tanks for sewerage disposal to hook up to sanitary sewer when the system fails, needs replacement, or requires major repairs when sanitary sewer laterals are readily available.

LU-3.6-1 In consultation with the LOTT partners, develop a program to connect developments that are on septic systems to LOTT's sewerage treatment system to reduce impacts to groundwater and surface water quality.

LU-3.7 Require residential and commercial development utilizing private wells for water systems to connect to City water service when the well fails, needs replacement, or requires major repairs, where City water service available

GOAL LU-4: Encourage land use patterns that increase the availability of affordable housing for all economic segments of the Tumwater population.

Policy

Action

LU-4.1 Coordinate the Land Use Element with the Housing Element and fully implement the goals, policies, and actions of the Housing Element.

LU-4.2 Encourage innovative techniques for providing affordable housing resulting in an attractive product that will be an asset to the Tumwater community.

LU-4.2.1 Consider revision of the City's Development Standards to encourage innovative land use management techniques.

**LAND USE ELEMENT
CHAPTER 3**

GOALS, POLICIES, AND ACTIONS

(Reference Goal LU-2.3.1)

- LU-4.3 Continue to allow manufactured housing on individual lots within the City, as well as within mobile and manufactured home parks, to encourage affordable housing.
- LU-4.3.1 Consider methods to provide sufficient land for manufactured housing in accordance with the Growth Management Act.
- LU-4.4 Permit implementing regulations to experiment in new forms of residential development where amenities of open space, privacy, and visual quality can be maintained or improved, and flexible solutions to land use problems such as density, diversity, equitability, and affordability can be achieved.
- LU-4.4.1 Consider revision of the City's Development Standards to encourage innovative land use management techniques.
(Reference Goal LU-2.3.1)
- LU-4.5 Encourage higher density residential uses in order to provide affordable housing. These uses should blend with the existing character of the community.
- LU-4.6 Increase housing types and densities in corridors and centers to meet the needs of a changing population.
- LU-4.7 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 LU-5: Ensure development patterns encourage efficient multi-modal transportation systems coordinated with regional, City, and county transportation plans.

Policy Action

- LU-5.1 Ensure coordination with the Transportation Element.
- LU-5.2 Ensure coordination with the Thurston Regional Transportation Plan.
- LU-5.2.1 Ensure the eleven County-Wide Policy elements in the County-Wide Policy Plan are implemented. (Reference

**LAND USE ELEMENT
CHAPTER 3**

GOALS, POLICIES, AND ACTIONS

Goal LU-1.1.1)

- LU-5.3 Ensure coordination with the Parks, Recreation, and Open Space Plan (Element).
- LU-5.4 Established pedestrian and bicycle trail links with various parts of Tumwater and within the business area.
- LU-5.4.1 Ensure coordination of the Land Use Element with the Parks, Recreation, and Open Space Plan (Element) and the Transportation Element.
- LU-5.5 Encourage provision of urban plazas and access to transit stops when new construction or major renovation is proposed. Incentives for providing such amenities should be sought.
- LU-5.5.1 Consider revision of the City's Development Standards to encourage provision of these amenities. Consider development of a citywide design standards program. (Reference Goal LU-2.3.1)
- LU-5.6 Allow densities and mixes of uses that reduce the number and lengths of vehicle trips and increase the opportunity to use public transit and non-motorized modes of travel.
- LU-5.7 Reinforce the link between land use and public transportation by encouraging development to occur at urban residential densities along designated transit corridors, nodes, and near commercial centers.
- LU-5.8 Ensure proposed capacity improvements to the City's transportation systems are designed to serve proposals that are contiguous to existing development, as a means to discourage the occurrence of "leap frog" development patterns.
- LU-5.9 Provide development incentives, such as increased density, increased square footage, or increased height for proposed land developments located adjacent to transportation corridors when amenities for transit users, bicyclists, and pedestrians are included.
- LU-5.10 Encourage land development proposals to utilize the capacity of the existing transportation system, especially transit and non-motorized modes.

**LAND USE ELEMENT
CHAPTER 3**

GOALS, POLICIES, AND ACTIONS

- LU-5.11 Encourage public and private development proposals to enhance the street side environment to maximize comfort for the transit user and the pedestrian.
- LU-5.12 Encourage subdivision and commercial and retail project design that facilitates cost-effective transit and emergency service delivery.
- LU-5.13 Discourage transportation improvements, regardless of their financing mechanisms that would trigger premature development; that is, development inconsistent with applicable comprehensive plans and zoning.
- LU-5.14 Ensure alternative transportation modes are included in comprehensive plans, subdivisions, and other land developments.
- LU-5.15 Expand bicycle and pedestrian data collection efforts.
- LU-5.16 Establish a regional bicyclist and pedestrian advisory body.
- LU-5.17 Support efforts of the local traffic safety campaigns to educate bicyclists and pedestrians of the laws pertaining to walking and biking.

GOAL LU-6: Reduce impacts from flooding; encourage efficient stormwater management; and ensure the groundwater of Tumwater is protected and preserved.

Policy Action

- LU-6.1 Ensure new development is in conformance with requirements and standards of the *Northern Thurston Groundwater Protection Plan*.
- LU-6.2 Ensure new development is in conformance with requirements and standards of the *Drainage Design and Erosion Control Manual for Tumwater*, as amended.
- LU 6.2.1 Implement specific Sustainable Thurston goals identified in Land Use Element Section 1.6, Sustainable Thurston Goals (Reference Appendix C: Sustainable Thurston)
- LU-6.3 Ensure coordination with the *Percival Creek Comprehensive Drainage Basin Plan*.

**LAND USE ELEMENT
CHAPTER 3**

GOALS, POLICIES, AND ACTIONS

- LU-6.4 Ensure new development is in conformance with aquifer protection standards of the Conservation Element.
- LU-6.5 Ensure implementation of the *Natural Hazards Mitigation Plan for the Thurston Region* to reduce or eliminate the human and economic costs of natural disasters for the overall good and welfare of the community.
- LU-6.6 Ensure coordination with the *Salmon Creek Comprehensive Drainage Basin Plan*.
- LU-6.6.1 Incorporate the development review process within the *Salmon Creek Comprehensive Drainage Basin Plan* into the Tumwater Municipal Code.

GOAL LU-7: Encourage retention of open space, parks, trails, and development of recreational opportunities within Tumwater.

- | <u>Policy</u> | <u>Action</u> |
|----------------------|---|
| LU-7.1 | Ensure coordination of the Land Use Element with the Parks, Recreation, and Open Space Plan (Element). |
| LU-7.2 | Ensure coordination of the Land Use Element with open space retention and natural area preservation standards of the Conservation Element. |
| LU-7.3 | Preserve environmentally sensitive lands, farmlands, mineral resources, and prairies, by developing compact urban areas. |
| LU-7.4 | Provide a variety of open spaces including landscaped buffers, small parks, plazas, and other community areas to balance higher density development and enhance quality of living. |
| LU-7.4.1 | Specify the amount of area that must be dedicated for open space and require configuration useful for the purpose desired in the City's Zoning Ordinance to make certain that areas of developments dedicated to open space provide the functions intended. |

GOAL LU-8: Ensure physical limitations of the land are observed during the development process.

**LAND USE ELEMENT
CHAPTER 3**

GOALS, POLICIES, AND ACTIONS

<u>Policy</u>	<u>Action</u>
LU-8.1	Ensure new development is in conformance with standards and requirements for critical areas within the Conservation Element.
	LU-8.1.1 Consider implementation of the state geological study and mapping program for the City. This study should address geologic, erosion, landslide, seismic, and volcanic hazard areas.
LU-8.2	Reserve the right to prohibit or set conditions on development based on anticipated adverse environmental impact.
LU-8.3	Ensure development within the jurisdiction of the Shoreline Management Act adheres to the flood control policies, land use controls, and regulations of the applicable environmental designation as described in the Tumwater Shoreline Master Program.
LU-8.4	Ensure new development is in conformance with the standards of the City's Protection of Trees and Vegetation Ordinance.
GOAL LU-9:	Identify what conditions should be applied to development in residential areas.

<u>Policy</u>	<u>Action</u>
LU-9.1	Protect residential developments from excessive noise, odors, dirt, glare, and other nuisances emanating from commercial and industrial uses.
LU-9.2	Allow for multi-family residential development in the zoning code. Consideration should be given to encouraging this type of development near centers of community services.
	LU-9.2.1 Consider revision of the City's Development Standards to encourage innovative land use management techniques. (Reference Goal LU-2.3.1)
LU-9.3	Integrate design features of existing natural systems into the layout and siting of new residential dwelling units. Preserve trees and significant ecological systems, whenever possible and practical.
	LU-9.3.1 Consider revision of the City's Development Standards to

**LAND USE ELEMENT
CHAPTER 3**

GOALS, POLICIES, AND ACTIONS

encourage innovative land use management techniques.
(Reference Goal LU-2.3.1)

LU-9.4 Permit experimentation in development regulations with newer forms of residential development where amenities of open space, privacy, and visual quality can be maintained or improved, and flexible solutions to land use problems can be achieved.

LU-9.4.1 Consider revision of the City's Development Standards to encourage innovative land use management techniques.
(Reference Goal LU-2.3.1)

LU-9.5 Do not permit private residential gated communities.

LU-9.6 Promote nearby access to healthy food for residential developments.

LU-9.6.1 Allow and encourage farm stands supplying fresh food in residential areas.

LU-9.6.2 Consider measures to encourage the creation of healthy corner stores within residential areas.

GOAL LU-10: Identify the City's policies and regulations pertaining to commercial and industrial areas and uses.

Policy Action

LU-10.1 Implement the goals, policies, and actions of the Economic Development Element through the Land Use Element.

LU-10.2 Encourage industry clusters to create jobs, and increase revenue circulation locally.

LU-10.3 Ensure adequate supply of developable land along primary transportation corridors and invest in commercial and industrial redevelopment.

LU-10.4 Encourage developers to concentrate non-residential land uses in integrated centers in order to insure convenient access and prevent strip development.

LU-10.5 Group commercial, industrial, and manufacturing uses into centers rather than dispersed throughout the City. These centers shall have a

**LAND USE ELEMENT
CHAPTER 3**

GOALS, POLICIES, AND ACTIONS

landscaped, urban park quality.

- LU-10.6 Rest future development of commercial, manufacturing, and light industrial areas in Tumwater on a comprehensive, integrated planning scheme incorporating performance standards regarding green belts, and buffering, landscaping, parking facilities, and other items of site design as appropriate.
- LU-10.7 Use land use regulations to guide new industrial development into areas and patterns that minimize heavy trucking through residential and business areas.
- LU-10.8 Ensure commercial and industrial structures, where practical, are low profile and provide landscaping including lawns, trees, and shrubs.
- LU-10.9 Locate commercial and industrial land uses close to arterial routes and freeway access and rail facilities.
- LU-10.10 Encourage neighborhood commercial uses that supply nearby residents with everyday convenience shopping goods in the City to reduce traffic generation, where, generally, these uses are very small, not generate excessive traffic, and compatible with nearby residences.
- LU-10.11 Encourage businesses to allow food trucks at work sites to bring diverse meal options and fresh produce to workers.
- LU-10.12 Emphasize sustainable practices while encouraging economic development.

GOAL LU-11: Ensure new and existing development is energy efficient.

Policy

Action

- LU-11.1 Recognize potential energy efficiencies associated with mixed-use developments and centers.
- LU-11.2 Encourage building design, orientation, and land use arrangements that take advantage of natural landforms, existing vegetation, and climatic features for reducing energy demands for heating and cooling purposes.
- LU-11.3 Aggressively pursue conservation or system improvements as a potential means to defer the siting and development of new facilities

**LAND USE ELEMENT
CHAPTER 3**

GOALS, POLICIES, AND ACTIONS

where appropriate.

- LU-11.4 Recognize savings in energy usage for heating and cooling purposes associated with common wall construction.
- LU-11.5 Encourage existing and new development to use landscaping to take advantage of the sun's warming rays in winter and to provide shade in summer.
- LU-11.6 Recognize potential energy savings through optimally using solar energy and orient development sites accordingly.
- LU-11.7 Consider the impact of new development and landscaping on solar accessibility of adjoining lots and mitigate wherever feasible.
- LU-11.8 Encourage development and integration of new energy technologies in the design of new development and redevelopment, which result in energy and cost savings.
- LU-11.9 Develop a program to encourage energy retrofits of existing buildings to improve their energy efficiency.
- LU-11.10 Coordinate the City's energy efficiency programs with the strategies in the most recent version of the Thurston Climate Mitigation Plan.

GOAL LU-12: Promote preservation of sites of historical and cultural significance.

Policy Action

- LU-12.1 Ensure coordination of the Land Use Element with Tumwater and Thurston County historic preservation programs.
- LU-12.2 Make land use decisions that protect designated state and national landmarks listed by the State Office of Archaeology and Historic Preservation.

GOAL LU-13: Protect Olympia Regional Airport from incompatible land uses and activities that could affect present and future use of airport facilities and operations. Regulations and criteria should reflect the urban environment adjacent to the airport.

**LAND USE ELEMENT
CHAPTER 3**

GOALS, POLICIES, AND ACTIONS

Policy Action

- | | |
|---------|--|
| LU-13.1 | Promote safe operation of Olympia Regional Airport by encouraging compatible land uses and activities and discouraging uses or activities that will impede safe flight operations or endanger the lives of people on the ground. |
| LU-13.2 | Coordinate protection of Olympia Regional Airport with Thurston County by developing consistent implementing regulations. |

3.3 Implementation Policies

Successful implementation of concepts, goals, and policies of the Land Use Element will require changes in regulations, procedures, programs, capital investments, and other activities.

The Land Use Element includes strategies that identify actions to achieve stated goals and policies. The following actions are proposed to implement the goals and policies of Land Use Element:

1. Change zoning designations, as may be appropriate, in certain areas of the City to be consistent with the overall City Land Use Map, the individual neighborhood maps, and policies.
2. Develop or modify existing zoning and land use regulations to achieve mixed-use areas, allow clustering and the use of innovative housing techniques, and address infill.
3. Protect Olympia Regional Airport from incompatible uses by applying development standards of the Airport Overlay Zone, Chapter 18.32 of the Tumwater Municipal Code. The Airport Overlay Zone addresses three primary issues further described below: height hazards, compatible land uses, and Airport Overlay Zone disclosure statements. Any changes to this chapter, as may be appropriate, should be made after consideration of the State Department of Transportation Aviation Division Publication "Airports and Compatible Land Use, Volume 1," and other best available technical information to the extent practical within an urban area.
4. Height Hazards. Prohibit structures and trees from penetrating airspace surfaces as defined by Title 14 of the Code of Federal

**LAND USE ELEMENT
CHAPTER 3**

GOALS, POLICIES, AND ACTIONS

Regulations Part 77, except as necessary and incidental to airport operations.

Land Use Types and Intensities. Permit appropriate land uses compatible with airport and aviation uses. Encourage contiguous open space areas within the Airport Overlay Zone that provide functional open space needs for aircraft in cases of an emergency. Open space areas should be large and contiguous to other open space areas.

5. Disclosure Statement. Require a disclosure statement to be recorded with the Thurston County Auditor for subdivisions, short subdivisions, binding site plans, and building permits located within the Airport Overlay Zone. The disclosure statement should state the property is located within the Airport Overlay Zone in which a variety of aviation activities occurs. Such activities may include but are not limited to noise, vibration, chemicals, odors, hours of operation and other associated activities.
6. Develop urban design plans and development standards to address compatibility of new development, preserve neighborhood character, and create pedestrian-oriented transit supportive development.
7. Through the Tumwater and Thurston County joint planning process and the County-Wide Planning Policies for Thurston County, direct the timing and location of development with the provision of adequate facilities and services within Tumwater's Urban Growth Area.
8. Invest in public improvements to facilitate and complement private development including streetscape improvements, public open spaces, and other amenities.
9. Review and modify, as necessary, existing plans to ensure consistency with the Land Use Element.
10. Continue public involvement in the planning process so decisions made regarding the growth and development of the City are reflective of general community goals and sensitive to special interests of effected parties.
11. Modify the land use regulatory review, permitting, and approval system for consistency with the Growth Management Act and adopted plans to ensure predictability and allow processing of development permits in a

**LAND USE ELEMENT
CHAPTER 3**

GOALS, POLICIES, AND ACTIONS

timely and fair manner.

12. Work with the Port of Olympia and the Federal Aviation Administration to remove the restrictions on residential development on Port owned land in the Town Center to allow full implementation of the City of Tumwater Town Center.
13. Clarify the differences in the City of Tumwater's definitions of warehouse distribution center and warehousing that is accessory to a manufacturing use.
14. Implement the Housing Action Plan strategies through land use actions by the City.
15. Implement the strategies in the most recent version of the Climate Mitigation Plan through land use actions by the City.
16. Implement the Urban Forestry Management Plan through the municipal code, Development Guidelines, City employee processes, and community education and engagement.

4 LAND SUPPLY ANALYSIS

4.1 Introduction

The purpose of the urban area land supply analysis is to determine how much residential, commercial, and industrial land Tumwater will need to have in order to accommodate at least 20 years of projected growth.

Under the Growth Management Act, the State Office of Financial Management gives counties planning under the Growth Management Act a 20-year population projection. The counties and the cities within them use these population estimates to designate their urban growth areas. Thurston County and all of the cities and towns within it must accommodate at least the population projection by State Office of Financial Management.

County-Wide Policy XI – County-Wide Policies Which Establish a Process to Develop Future Policies addresses population distribution in Tumwater:

11.1. Process to determine and assure sufficiency of Urban Growth Areas to permit projected urban population:

- a. The state Office of Financial Management (OFM) growth management planning population projections for Thurston County will be used as the range of population to be accommodated for the coming 20 years.*
- b. Within the overall framework of the OFM population projections for the County, Thurston Regional Planning Council will develop countywide and smaller area population projections, pursuant to RCW 36.70A.110 and based on current adopted plans, zoning and environmental regulations and buildout trends.*
- c. A review and evaluation program pursuant to RCW 36.70A.215 (“Buildable Lands Program”) will be established. The evaluation and subsequent updates required under the Buildable Lands Program will follow timelines in the RCWs, subject to availability of State funding. This evaluation may be combined with the review and evaluation of county and city comprehensive land use plans and development regulations required by RCW 36.70A.130 (1), and the review of urban growth areas required by RCW 36.70A.130(3).*

**LAND USE ELEMENT
CHAPTER 4**

LAND SUPPLY ANALYSIS

- i. *In the event of a dispute among jurisdictions relating to inconsistencies in collection and analysis of data, the affected jurisdictions shall meet and discuss methods of resolving the dispute.*
- ii. *Nothing in this policy shall be construed to alter the land use power of any Thurston County jurisdiction under established law.*
- iii. *Because inclusion of this policy is as a result of state mandated legislation, implementation of this policy shall be commensurate with state funding.*
- d. *The Thurston Regional Planning Council will review the smaller area population projections to assure that the 20-year population is accommodated county-wide, and that urban growth areas are of sufficient area and densities to permit the projected urban population.*

Explanatory Comment: If the smaller area projections under No. 2, above, indicate, for example, that based on existing planning, zoning, and buildout trends that one or all urban growth areas would be full before 20 years, the county and cities will be in a position through the review that would take place under provision No. 3, above, to identify needed actions, such as enlarging growth boundaries encouraging more compact development inside growth areas, mechanisms to cut the amount of population coming into the county, etc.

Table 8 shows a projection of population growth for Tumwater and its Urban Growth Area developed by the Thurston Regional Planning Council. It is based upon a hybrid economic and demographic model.

Thurston Regional Planning Council applied two growth scenarios in their: current trends and full density. The current trends projection assumes that growth will occur as it has with existing zoning and development regulations. The full density assumes that development will occur in a more compact manner than presently occurs and that more growth will be accommodated in the City and its Urban Growth Area. Given the goals and mandates of the Growth Management Act and the policies and land use designations used in the Land Use Element and the Housing Element, the full density population projection has been used.

The Land Use Element only addresses areas that are presently within the Tumwater

**LAND USE ELEMENT
CHAPTER 4**

LAND SUPPLY ANALYSIS

City limits. Planning in the Urban Growth Area will occur through the Tumwater and Thurston County joint planning process.

Table 8. Tumwater and Urban Growth Area 20-Year Population Projection

	2015¹ Population	2035² Population	Population Increase	Percent Increase 2015-2035
Tumwater	21,939	34,680	12,741	58%
Urban Growth Area	3,250	8,203	4,954	152%
Combined Areas	25,188	42,883	17,695	70%

Source: ¹ Office of Financial Management, Forecasting Division

² The Profile, October 2015, Thurston Regional Planning Council, and the Population and Employment Forecast for Thurston County Final Report

Note: 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.

The data in Table 8 indicates that the total population for Tumwater's present city limits will be 34,680 persons. Presently, in 2015, the population within Tumwater's city limits is 21,939. It can be seen that an additional population of 12,741 must be accommodated within the city limits within the 20-year planning period.

The first step in performing an urban area land supply analysis is to determine what land uses are in the City through a land use inventory and land use database. As indicated in Chapter 1, Introduction this has been completed for Tumwater by the Thurston Regional Planning Council through the Buildable Lands Program.

4.2 Partially Used and Under Utilized Land Supply Analysis

It is particularly difficult to determine build out of partially used and under-utilized land due to several factors such as current economic conditions, property owners holding property from the market for an anticipated increase in value, businesses retaining property for future expansion, and residential property owners holding property in order to retain privacy around an existing unit. Thurston Regional Planning Council has incorporated these factors into their buildable lands estimates for 2015.

4.3 Developable or Re-developable Land Supply Analysis

It is important to know that not all of the vacant land in Tumwater is available for development. Land might not be available for development for some or all of the following reasons:

1. The land is undevelopable due to environmental constraints such as geological hazards and wetlands. These constraints are clarified in Tumwater's Conservation Element. Previously, a factor of 20% was used to estimate the amount of this type of undevelopable land. However, due to new data and mapping systems almost all of the environmental constraints were mapped and can be calculated at an acceptable accuracy level. Thurston Regional Planning Council has done this task and incorporated it into the *Buildable Lands Report for Thurston County* (2014).

Note: Thurston Regional Planning Council did not use steep slope data in determining the Buildable Lands data for Tumwater due to an unacceptable level of accuracy when applied to a parcel based citywide map of Tumwater.

2. A certain amount of vacant land is needed for roads and rights-of-ways. Thurston Regional Planning Council has calculated that 17% of the vacant developable land will be needed for future roads and rights-of-way.
3. A certain amount of vacant land will be developed into uses other than residential. These uses include churches, parks, schools, and daycares, all of which are currently allowed within residential zones. Thurston Regional Planning Council estimates that these uses will consume varying amounts of land within different residential zones.

Thurston Regional Planning Council has determined that 25% of the vacant developable land, which is being held out of the marketplace for investment, future expansion, or personal use, will be available for development every five years. It is assumed that all of this type of land will be available for development at one time or another during the 20-year planning period.

Generally, land with the fewest site constraints develops first because it is less expensive and more convenient to develop. Remaining vacant land may have more site constraints and be more difficult to develop.

LAND USE ELEMENT
CHAPTER 4

LAND SUPPLY ANALYSIS

When the preceding factors are taken into consideration, there may be less land available for development or re-development than is initially apparent. This is shown in Tables 9, 10, and 11 below.

Table 9. Buildable Commercial Land in Acres

City or Urban Growth Area	Zone	Vacant or Partially-used	Redevelopable¹	Other
City	Brewery District	11	12	
	Capitol Boulevard Corridor	8	28	
	Community Services	0	-	
	General Commercial	164	39	
	Historic Commercial	-	0	
	Mixed Use	46	6	
	Neighborhood Commercial	13	2	
	Town Center	19	10	Unknown ²
Urban Growth Area	Business Park	17	-	
	Commercial Development	6	10	
	General Commercial	33	2	
	Neighborhood Commercial	2	1	
Total		320	111	

Notes: ¹ Land with moderate to high likelihood of intensifying uses.

² Development potential not estimated for Port of Olympia's Tumwater properties and Brewery Properties.

**LAND USE ELEMENT
CHAPTER 4**

LAND SUPPLY ANALYSIS

Table 10. Buildable Industrial Lands in Acres

City or Growth Area	Zone	Vacant or Partially-used	Redevelopable ¹	Other
City	Airport Related Industry	0	0	Unknown ²
	Heavy Industrial	4	1	
	Light Industrial	811	131	Unknown ²
Urban Growth Area	Light Industrial	189	27	Unknown ²
Total		1,004	160	

Notes: ¹ Land with moderate to high likelihood of intensifying uses.

² Development potential not estimated for Port of Olympia's Tumwater properties and Brewery Properties.

4.4 Analysis of Population Accommodation

In order to determine whether the City has the capacity to accommodate the projected population, an analysis of all of the proposed residential land use designations was performed. The Mixed Use designation has been included in these calculations to reflect the potential of this designation to accommodate residential development.

Table 11. Residential Land Supply and Future Development Capacity

			Residential Capacity		
City or Urban Growth Area	Zone	Residential Buildable Land Estimate in year 2000 (Acres)	2014 Dwelling Units	Additional Residential Capacity on Buildable Land (2015-Buildout)	Redevelopment & Accessory Dwelling Unit Estimate
City	Brewery District	1	36	26	221
City	Capitol Boulevard Corridor	1	62	25	347
City	General Commercial	6	99	76	10
City	Light Industrial	-	75	-	-
City	Multi-Family High Density Residential	12	1,053	356	0

**LAND USE ELEMENT
CHAPTER 4**

LAND SUPPLY ANALYSIS

			Residential Capacity		
City or Urban Growth Area	Zone	Residential Buildable Land Estimate in year 2000 (Acres)	2014 Dwelling Units	Additional Residential Capacity on Buildable Land (2015-Buildout)	Redevelopment & Accessory Dwelling Unit Estimate
City	Multi-Family Medium Density Residential	157	1,658	1,062	-
City	Manufactured Home Park	6	506	28	-
City	Mixed Use	5	84	117	8
City	Residential and Sensitive Resource	149	256	414	-
City	Single Family Low Density Residential	674	2,314	2,979	6
City	Single Family Medium Density Residential	414	3,468	1,998	44
City	Town Center Mixed Use	0	0	6	1
City	Town Center Residential	1	165	18	14
UGA	Commercial Development	0	23	1	2
UGA	Multi-Family Medium Density Residential	67	430	387	-
UGA	Residential and Sensitive Resource	36	132	84	-
UGA	Single Family Low Density Residential	371	604	1,507	-
UGA	Single Family Medium Density Residential	108	102	695	0
Total		2,010	11,067	9,781	653

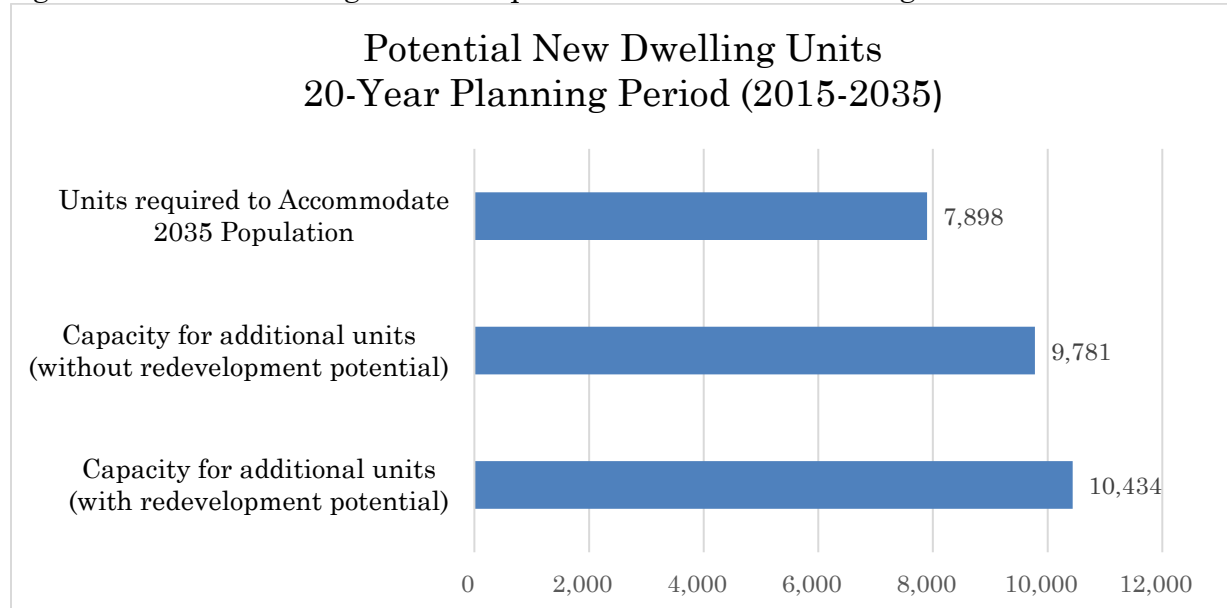
Source: Thurston Regional Planning Council Data Program

LAND USE ELEMENT CHAPTER 4

LAND SUPPLY ANALYSIS

Note: This data set is updated from that used in the 2013 *Buildable Lands Report*: dwelling units were updated to 2014, and two new zoning districts were included in the analysis. Capacity estimates include reductions for public facilities such as roads, schools, and parks as noted in Thurston Regional Planning Council's Land Supply Assumptions documentation.

Figure 3. New Dwelling Units Required for 20-Year Planning Period.



Note: 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 3 shows the results of the calculations graphically. The first bar of the graph shows the number of residential units needed to accommodate projected population growth. The second and third bars of the graph indicate the potential new units that could be constructed. The minimum and maximum density bars are based on the density ranges of each residential land use designation and the Mixed Use designation.

What the graph shows is that the City can accommodate the projected population growth. Even if all development occurs at the minimum density, accommodation of all the projected population will be possible. However, it is not expected that the majority of development will occur at minimum densities. As population increases in the Thurston County area and housing costs become increasingly more expensive due to land and construction costs, it is likely that a larger market for higher density development will occur.

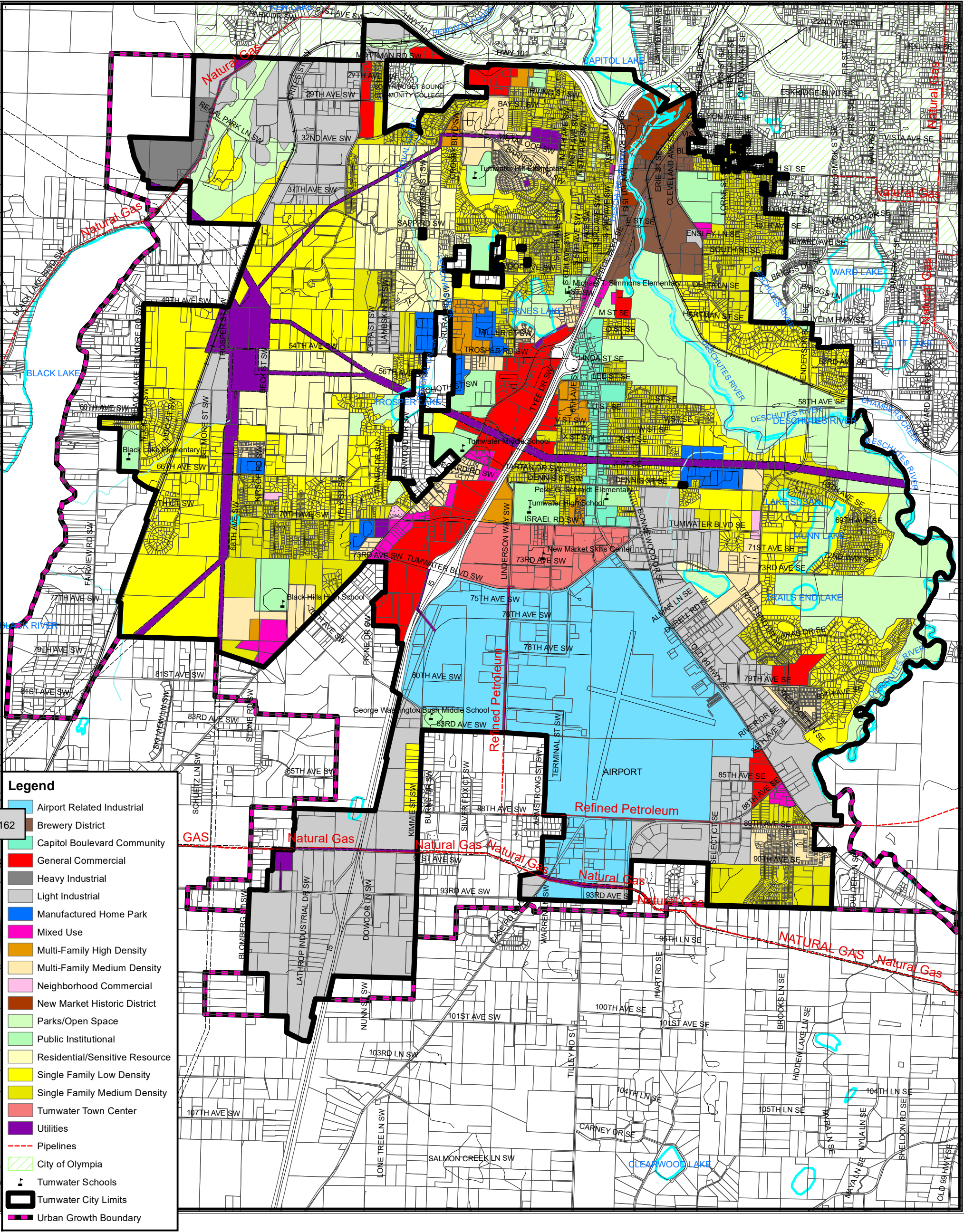
Each land use designation intended for residential uses will utilize a minimum density policy. A minimum density policy would require development to be configured so that

**LAND USE ELEMENT
CHAPTER 4****LAND SUPPLY ANALYSIS**

infill may occur in the future and would ensure that valuable urban land is not developed at extremely low densities. The minimum density policy is one of the main tools to accommodate future population in the Land Use Element.

City of Tumwater

City-Wide Land Use Map



162

Legend

- Airport Related Industrial
- Brewery District
- Capitol Boulevard Community
- General Commercial
- Heavy Industrial
- Light Industrial
- Manufactured Home Park
- Mixed Use
- Multi-Family High Density
- Multi-Family Medium Density
- Neighborhood Commercial
- New Market Historic District
- Parks/Open Space
- Public Institutional
- Residential/Sensitive Resource
- Single Family Low Density
- Single Family Medium Density
- Tumwater Town Center
- Utilities
- Pipelines
- City of Olympia
- Tumwater Schools
- Tumwater City Limits
- Urban Growth Boundary

0 0.5 1 2 3 4 Miles

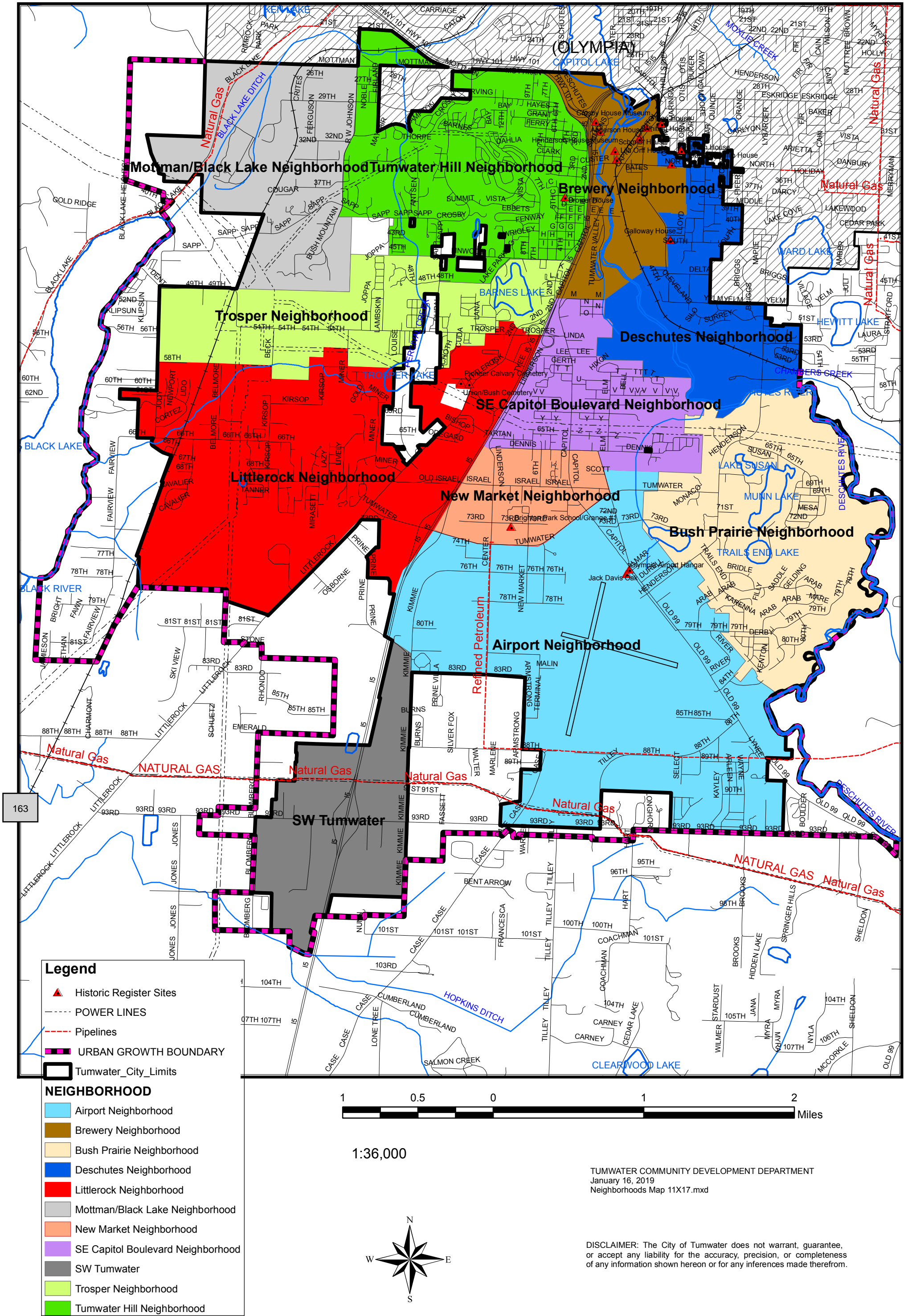
1:34,800

DISCLAIMER: The City of Tumwater does not warrant, guarantee, or accept any liability for the accuracy, precision, or completeness of any information shown hereon or for any inferences made therefrom.

Tumwater Community Development Department
November 8, 2021



CITY OF TUMWATER NEIGHBORHOODS



Appendix F: Glossary

Accessory Dwelling Unit – As defined in TMC 18.04.040, a dwelling unit that is an accessory use or structure subordinate to a single-family dwelling. May be referred to as “mother-in-law” or “accessory apartment.”

Action – Specific tasks that are undertaken in support of goals and policies.

Adequate Capital Facilities – Facilities that have the capacity to serve development without decreasing levels of service below locally established minimums.

Alluvial – Loose soil or sediments typically made from a variety of materials such as silt, clay, sand, and/or gravel.

Alluvial Fan – A fan shaped mass of soil and debris deposited by a river.

Anadromous – A type of fish that migrates between rivers and oceans for mating seasons.

Andesite (Andesitic) – A type of volcanic rock typically found in subduction zones, which are places where two tectonic plates meet and one is forced under the other.

Annex (Annexation) – To incorporate or to add additional land into the City.

Apiaries – Bee hives.

Appurtenance – An accessory building or use.

Aquifer – An underground pocket of water, which is refilled by surface water that filters through the ground.

Aquitard – A type of soil that has a low potential to supply usable quantities of drinking water to an aquifer.

Arterial (Minor) – A roadway providing movement along a significant traffic corridor. Minor arterials interconnect and augment the principal arterial system. Generally, traffic on minor arterials serves the immediate local community for short to moderate trip lengths. Traffic volumes are high, although usually not as great as those found on principal arterials. Traffic speeds for minor arterials are similar to that of principal arterials.

Arterial (Principal) – A roadway providing movement along a major traffic corridor. Principal arterials serve major urban and activity centers and access points to the freeway. They also serve as high traffic volume corridors that carry local cross-town trips and regional pass-through trips. Traffic volumes are higher, and trip lengths are longer than those usually associated with minor arterials.

Assessed Valuation – The dollar value assigned to a property for to measure applicable taxes. Assessed valuation determines the value of a residence for

Appendix F: Glossary

tax purposes and takes comparable home sales and inspections into consideration. The value is established by the Thurston County Assessor at 100% of appraised market value and adjusted by the State of Washington to account for variations in assessment practices among counties.

Available Capital Facilities – Facilities, services, or financial commitments in place that provide the facilities or services within a specified time. In the case of transportation, the specified time is six years.

Best Available Science (BAS) – Washington State Law requires that the best available science should be used to inform decision makers and staff. Best available is scientific information that is acquired through a rigorous and valid scientific process.

Biodiversity – A measure of how many different types of animal and plant life live in one area.

Bonding – The act of issuing the debt of finance capital projects and other expenditures.

Buffer (General) – Any structural, earth, or vegetative form located along a boundary for the purpose of insulating or separating a structure or land use from other land uses or structures, in such a manner as to reduce or mitigate any adverse impacts of one or the other. Buffers may include, but are not limited to, vegetative berms, high shrubs, dense stands of trees, trellises, or fences.

Buffer (Sensitive Areas) – The area immediately adjacent to critical areas that protect these sensitive areas and, for wetlands and habitat areas, provide essential habitat elements for fish and/or wildlife.

Capital Facility – A physical structure owned or operated by a government entity that provides or supports a public service that is classified as a fixed asset, has an estimated cost of \$50,000 or more (except land), and typically has a useful life of 10 years or more (except certain types of equipment).

Capital Improvement – Physical assets constructed or purchased to provide, improve, or replace a public facility and that are large in scale and high in cost. The cost of a capital improvement is generally nonrecurring and may require multiyear financing.

Capital Improvement Program (CIP) – The City plan that addresses construction, repair, maintenance, and acquisition of major capital facilities and equipment. The document provides a tool for public comment and City review regarding projects planned for the next six years, including transportation, surface water management utility, water and sewer utility, park, public safety, general government, and equipment purchases.

Appendix F: Glossary

Capital Program – A plan for capital expenditures to be incurred each year over a fixed period of years to meet capital needs arising from a long-term work program. It sets forth each project or other expenditure in which the City is to have a part and specifies the full resources estimated to be available to finance the projected expenditures.

Centennial Clean Water Program (CCWP) – In 1986, legislation was passed which provides grants to public entities for financing water pollution control activities and facilities to protect surface and underground water from pollution. In addition, a State revolving loan program was established to provide loans or combinations of grants/loans to finance public facilities.

Chlorine (Chlorinated) – A chemical that is commonly used to disinfect water. In small quantities it is safe but higher quantities are known to have environmental and human health impacts.

Clustered Development – The grouping or attaching of buildings in such a manner as to achieve larger aggregations of open space than would normally be possible from lot-by-lot development at a given density. Clustered development may involve detached single-family residences and common-wall methods of construction, as opposed to the more traditional pattern of detached dwelling units with minimum lot sizes and setback requirements.

Collector – A roadway capable of handling relatively moderate traffic volume, moderate trip length, and moderate operating speed. Collector roads collect and distribute traffic between local roads or arterial roads.

Commercial – Includes retail, office services, entertainment, and recreation uses, depending on the location. Retail uses are those, which provide goods and/or services directly to the consumer, including service uses not usually allowed within an office use. Commercial areas can range in size and function from small residential markets serving the immediate neighborhood to regional draws.

Community Park – Parks designed for and open to the public, specifically for those who live in nearby neighborhoods.

Comprehensive Plan – A generalized coordinated policy statement of the City Council that is adopted pursuant to the Growth Management Act.

Concurrency – Adequate capital facilities are available when the impacts of development occur. This definition includes the two concepts of “adequate capital facilities” and “available capital facilities” as defined above.

Concurrent – Happening simultaneously.

Conserve (Conservation) – The action of preventing harm or destruction.

Appendix F: Glossary

Consistency – That 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.

Coordination – Consultation and cooperation among jurisdictions.

Councilmanic General Obligation Debt – The amount of debt that may be obligated by the legislative body without voter approval. Based on a percentage of the jurisdiction's assessed value as prescribed by statute.

Critical Areas – As defined in the State Growth Management Act, RCW 36.70A.030(5), the following areas and ecosystems – “(a) wetlands, streams, and minor lakes; (b) areas with a critical recharging effect on aquifers used for potable water; (c) fish and wildlife habitat conservation areas; (d) frequently flooded areas; and (e) geologically hazardous areas.”

Debt – An obligation to pay back borrowed money.

Debt Limits – The maximum amount of gross or net debt that is legally permitted.

Demographic – A particular section of a population categorized by a characteristic such as age, marital status, or race.

Density – The permissible number of dwelling units that may be developed on a specific amount of land area measured in number of dwelling units per acre.

Density Bonus – A greater number of units than would otherwise be permitted on a site under existing zoning, in exchange for developing in a more desirable way.

Development – The construction or exterior alteration of one or more structures, or a change in the type of intensity of land use, or the dividing of land, or any project of a permanent or temporary nature requiring land use modification.

Development Activity – Any construction or expansion of a building, structure, or use, any change in use of a building or structure, or any change in the use of land that creates additional demand and need for public facilities.

Development Regulations – Any controls placed on development or land use activities by the City, including, but not limited to, zoning ordinances, subdivision ordinances, rezoning, building codes, sign regulations, binding site plan ordinances, or any other regulations controlling the development of land.

Domestic Water System – Any system providing a supply of potable water for the intended use of a development, which is deemed adequate pursuant to RCW 19.27.097.

Appendix F: Glossary

Dwelling Unit – One or more rooms or structures providing complete, independent living facilities for one family, including permanent provisions for living, sleeping, cooking, and sanitation.

Dwelling Unit (Attached) – A unit that is physically connected by means of one or more common walls to another unit; that has its own exterior entrance; and that is not stacked above or below another unit.

Dwelling Unit (Detached) – A unit that is physically separated by setbacks from other dwelling units.

Encumbered – To reserve, set aside, or otherwise earmark the impact fees in order to pay commitments, contractual obligations, or other liabilities incurred for public facilities.

Energy Efficiency – The measurement of how well something uses energy like electricity or gas. A building is energy efficient if it can run well while using the smallest amount of energy possible.

Enterprise Fund – See Proprietary Fund

Environmental Impact Statement – A detailed statement regarding proposed actions having a significant effect on the quality of the environment (see RCW 43.21C.030(c) for further definition).

Fee-in-Lieu – The payment of money in place of dedicating land and/or easements as required by adopted regulations.

Financial Commitment – Identified sources of public or private funds or combinations thereof, which will be sufficient to finance capital facilities necessary to support development and the assurance that such funds will be timely put to that end.

General Obligation Debt – Debt that will be repaid mainly by taxes and other general governmental revenues. This debt includes limited and unlimited general obligation bonds, capital leases and other notes, and contracts issued with the full faith and credit of the government.

Geologically Hazardous Areas – Landslide hazard areas, erosion hazard areas, and seismic hazard areas.

Goal – The long-term end toward which programs or activities are ultimately directed.

Groundwater – Water that has filtered through the ground and has collected in aquifers. Groundwater is the City's main source of drinking water.

Appendix F: Glossary

Growth Management – A method to guide development in order to minimize adverse environmental and fiscal impacts and maximize the health, safety, and welfare benefits to the residents of the community.

Guaranty Fund – A fund established by a bond issuer that is pledged as security for the payment of one or more bond issues. Normally used for Local Improvement Districts.

High-Density Residential – Detached or attached residential uses at 15 or more dwelling units per acre.

Household – A household includes all the persons who occupy a dwelling unit. The occupants may be a single family, one person living alone, two or more families living together, or any other group of related or unrelated persons who share living arrangements.

Impact Fee – A fee levied by a local government on new development so that the new development pays its proportionate share of the cost of new or expanded public facilities required to service that development.

Impervious Surface – A surface which prevents or severely restricts the passage of water through it, such as asphalt, concrete, roofs, and other similar materials or surfaces.

Industrial/Light Industrial – Uses such as manufacturing, assembly, processing, wholesaling, warehousing, distribution of products and high technology. Light industrial areas may also include office and limited retail uses.

Infill Development – Development of vacant or undeveloped land in already developed neighborhoods. Often includes smaller lot size and/or smaller unit sizes.

Infrastructure – Physical structures that serve the common needs of the population, such as – sewage disposal systems, potable water systems, solid waste disposal sites or retention areas, stormwater systems, utilities, bridges, and roadways.

Institutions – Schools, churches, colleges, hospitals, governmental facilities, and public utilities for which special zoning districts are appropriate.

Intensity – A measure of land use activity based on density, use, mass, size, and/or impact.

Inundation – An overwhelming flood. Can be used literally or figuratively.

Lahars – The deposit left by a landslide of volcanic debris (ash, breccia, and boulders) on the side of a volcano usually caused by heavy rainfall.

Appendix F: Glossary

Latecomer Fees – Fees paid by developers or future service users for their share of past improvements financed by others.

Leasing – A financing technique where ownership of the project or equipment with the finance entity, and where title may or may not transfer to the City at the end of the lease.

Level of Service (LOS) – An indicator of the quantity or quality of service provided by, or proposed to be provided by, a facility, or service based on and related to the operational characteristics of the facility. Level of Service standards are the City's adopted minimum acceptable level of service.

Levy Lid – A statutory restriction on the annual increase in the amount of property tax a give public jurisdiction can assess on regular or excess levies.

Loam – A mixture of roughly equal parts sand, silt, and clay.

Local Improvement District (LID) – A statutory process by which property owners within a specified area are mutually assessed for neighborhood improvements that benefit the properties in the area. The project is usually financed through a long-term bond issue and the repayment is mainly from the collection of special assessments from the benefitting properties.

Local Road – A roadway serving relatively low traffic volume, short average trip length, or minimal through-traffic movements.

Low-Density Residential – Detached single-family residential uses with a density of one to nine dwelling units per acre, or attached single-family residential uses with a density of one to seven dwelling units per acre.

Low Impact Development (LID) – A style of development, which incorporates stormwater facilities into the design and minimizes or mitigates the negative impacts of converting open space into infrastructure.

Medium-Density Residential – Detached single-family residential uses with a density of 10 to 14 dwelling units per acre, or attached or stacked residential uses with a density of eight to 14 dwelling units per acre.

Mitigation Fees – Contributions made by developers toward future improvements of City facilities resulting from the additional demand generated from development.

Mixed use – Development characterized by complementary land uses – land uses that are at least compatible and, preferably, work together for mutual benefit (e.g., personal commercial services that serve adjacent residences) and convenient pedestrian connections.

Mode Split – The statistical breakdown of travel by alternate modes, usually expressed as a percentage of travel by single-occupant automobile, carpool,

Appendix F: Glossary

transit, etc. Mode-split goals are used to evaluate the performance of transportation systems.

Multifamily – Residential use of land where a structure provides shelter for two or more households at medium to high densities.

Multimodal – In the context of transportation, multimodal refers to the multiple modes of transportation that people use such as walking, biking, busing, or driving. A multimodal transportation plan works to improve all modes of transportation rather than just driving and busing.

Office – Uses providing services other than production, distribution, or sale or repair of goods or commodities. Depending on the location, these uses may range from single-story, residential-scale buildings to multistory buildings and/or multi-building complexes.

Parks/Open Space – Natural or landscaped areas used for active or passive recreational needs, to protect environmentally sensitive areas, and/or to preserve natural landforms and scenic views.

Permeable – A material is considered permeable if liquids or gases can pass through it. Permeable surfaces (e.g. permeable pavement or grass covered soil) allow water to pass through them and into the ground.

Planning Period – The 20-year period following the adoption of a comprehensive plan or such longer period as may have been selected as the initial planning horizon by the planning jurisdiction.

Policy – Principle that reflects a method or course of action to achieve an identified goal.

Preserve – The action of keeping something in its original state.

Proprietary Fund – A fund established to account for operations that are financed and operated in a manner similar to private business enterprises or where the governing body has decided that periodic termination of revenues earned, expenses incurred, and/or net income is appropriate for capital, maintenance, public policy, management control, accountability, or other purposes.

Public Facilities – Include streets, roads, highways, sidewalks, street and road lighting systems, traffic signals, domestic water systems, storm and sanitary sewer systems, parks and recreational facilities, fire stations, libraries, and schools. These capital facilities are owned or operated by a public entity, such as the City, that provides or supports a public service.

Public Services – Include fire protection and suppression, emergency medical services, law enforcement, public health, library, solid waste, education, recreation, environmental protection, and other governmental services.

Appendix F: Glossary

Public Works Trust Fund (PWTF) – A low-interest revolving loan fund, which helps local government finance critical public work needs.

Quaternary Slumps – A mass of loose rock from the present period of earth history (roughly the last 2 million years).

Rail-Banked Rail Lines – Rail lines acquired through the National Trails System Act whereby the railroad company sells or leases an out-of-service rail line to a local government agency for use as a trail until such time that a railroad might need the corridor again for rail service.

Raw Resource – Unprocessed natural material that is used to produce goods or energy after being processed.

Real Estate Excise Tax (REET) – A tax upon the sale of real estate property from one person or company to another.

Regional Facilities – Public capital facilities of a regional or statewide nature, such as wastewater treatment plants, airports, or in-patient treatment facilities. These facilities may be privately owned but regulated by public entities.

Regional Transportation Plan – The transportation plan for the regionally designated transportation system, which is produced by the Regional Transportation Planning Organization (RTPO).

Regional Transportation Planning Organization (RTPO) – The voluntary organization conforming to RCW 47.80.020, consisting of local governments within a region containing one or more counties, which have common transportation interests, such as the Thurston Regional Planning Council.

Revenue Bonds – Bonds whose principal and interest are payable exclusively from earnings of an enterprise fund. In addition to a pledge of revenues, such bonds sometimes contain a mortgage on the enterprise fund's property.

Revised Code of Washington (RCW) – Current State laws.

Right-of-Way – Land in which the City owns the fee simple title or has an easement dedicated or required for a transportation or utility use.

Riparian Area – The area surrounding a river or stream.

Riverine – Relating to a river or riverbank.

Sanitary Sewer Systems – All facilities, including approved on-site disposal facilities, used in the collection, transmission, storage, treatment, or discharge of any waterborne waste, whether domestic in origin or a combination of domestic, commercial, or industrial waste.

Sensitive Areas – Wetlands, streams, lakes, and frequently flooded areas.

Appendix F: Glossary

Shorelines – The Deschutes River, Black Lake Drainage Ditch, portions of Percival Creek, Barnes Lake, Black Lake, Capitol Lake, Munn Lake, Lake Susan, and Trooper Lake, associated wetlands, those lands extending landward 200 feet from its ordinary high water mark and critical area buffers within 200 feet of the ordinary high water mark. These are lands within State shorelines jurisdiction, pursuant to RCW 90.58.030.

Silt – A soil or sediment that is finer than clay but not as fine as sand that is slippery when wet and feels like flour when dry.

Single-Family – Residential use of land where dwelling units provide shelter and living accommodations for one family.

Special Assessment – A compulsory levy made against certain properties to pay part or all of the cost of a specific improvement or service deemed to benefit primarily those properties.

Stratigraphy – The order and position of rock layers above underground aquifers.

Stream Incision – The process of a streambed being dropped which results in the stream becoming disconnected from its floodplain.

Suburbs/Suburban – Refers to residential areas that have relatively lower population densities than areas that would be considered urban but higher than those areas considered rural.

Sustainable Building Practices – Various techniques to reduce construction and maintenance costs and to benefit the environment, such as using recycled building materials, reusing water, and installing alternative heating and cooling systems.

System Improvement – Public facilities included in the Capital Facilities Plan and designed to provide service within the community, in contrast to project improvements.

Townhouse – Dwelling units attached one to the other, having common walls between individual units, generally two and sometimes three stories in height. Each unit occupies the space between common walls from the lowest level to the roof.

Transportation Demand Management Strategies (TDM) – Strategies aimed at changing travel behavior rather than at expanding the transportation network to meet travel demand. Such strategies can include the promotion of work-hour changes, ride sharing, vanpooling options, transit flex passes, preferential parking for carpools, charge for parking, guaranteed ride home program, available showers and lockers, and telecommuting.

Appendix F: Glossary

Transportation Facilities – Includes capital facilities related to air, water, or land transportation.

Transportation Improvement Board (TIB) – A board that invests State gas tax funds in local communities through five grant programs serving cities, urban counties, and transportation benefit districts in the State.

Tumwater Municipal Code (TMC) – Ordinances that dictate what is legal in Tumwater.

Urban Governmental Services – Those governmental services historically and typically delivered by cities and include storm and sanitary sewer systems, domestic water systems, street cleaning services, fire and police protection services, public transit services, and other public utilities associated with urban areas and normally not associated with nonurban areas.

Urban Growth – Refers to growth that makes intensive use of land for the location of buildings, structures, and impermeable surfaces to such a degree as to be incompatible with the primary use of such land for the production of food, other agricultural products, or fiber, or the extraction of mineral resources. When allowed to spread over wide areas, urban growth typically requires urban governmental services. “Characterized by urban growth” refers to land having urban growth located on it, or to land located in relationship to an area with urban growth on it as to be appropriate for urban growth.

Urban Growth Area (UGA) – The area around the City that is currently unincorporated Thurston County, which the City plans to annex in the future.

Urbanization – The process of the City becoming more urban such as increasing population density in centralized locations that are closer to hubs of commercial activity, jobs, and other services.

Utilities – Facilities serving the public by means of a network of wires or pipes, and structures ancillary thereto. Included are systems for the conveyance of natural gas, electricity, telecommunications services, water, surface water and the disposal of sewage.

Utility Local Improvement District (ULID) – Created only for improvements to sewer, water, and other utilities, and differs from a Local Improvement District in that all assessment revenues must be pledged for payment of debt service of bonds issued to finance the improvements.

Vision Statement – A summary of the desired character and characteristics of the community 20 years in the future and that provides the ultimate goal for community planning and development.

Appendix F: Glossary

Visioning – A process of citizen involvement to determine values and ideals for the future of a community and to transform those values and ideals into manageable and feasible community goals.

Washington Administrative Code (WAC) – Regulations of executive branch agencies in Washington.

Wellhead Protection Area – The area surrounding a wellhead that is separated into different zones depending on how long it will take water on the surface to travel into the aquifer that the wellhead draws from. For example, a six-month wellhead protection area is an area where water will take six months to move through the ground and into the aquifer.

Wetland – Those areas that are inundated or saturated by surface water or groundwater at a frequency and duration to support, and that under normal conditions do support, a prevalence of vegetation typically adapted for life in saturated soils conditions. Wetlands generally include swamps, marshes, bogs, and similar areas. Wetlands do not include those artificial wetlands intentionally created from nonwetland sites, including but not limited to irrigation and drainage ditches, grass-lined swales, canals, retention and/or detention facilities, wastewater treatment facilities, farm ponds, and landscape amenities, or those wetlands created after July 1, 1990, that were unintentionally created as a result of the construction of a road, street, or highway. However, wetlands do include those artificial wetlands intentionally created from nonwetland sites as mitigation for the conversion of wetlands.

Zoning – The demarcation of an area by ordinance (text and map) into zones and the establishment of regulations to govern the uses within those zones and the location, bulk, height, shape, and coverage of structures within each zone.



Department of Commerce
Innovation is in our nature.

Urban Growth Area Guidebook

Reviewing, Updating and Implementing Your
Urban Growth Area

PUBLICATION SUMMARY

Title:	Urban Growth Area Guidebook Reviewing, Updating and Implementing Your Urban Growth Area
Publication number:	003
Month-year published:	11/2012
Month-year updated:	
Online/Print availability:	YES/YES
Short description:	This guidebook describes reviewing, updating and implementing the urban growth areas including population forecasts and conducting a fiscal analysis for urban services.
Articles include:	Urban Growth Areas, Fiscal Analysis, Land Capacity, Review, Update, Population, Buildable Lands
Author(s):	Bruce Hunt
Number of pages:	000
Keywords:	Urban Growth Areas, Fiscal Analysis, Land Capacity, Review, Update, Population, Buildable Lands

USING THIS DOCUMENT:

This PDF document is set up to be viewed easily on the web. • You can navigate from page to page without scrolling.
 • Type is larger than average print document size. • Bookmarks are used to allow you to jump to chapters and sub-heads
 • You can jump back to the Table Of Contents from any page. • Text highlighted in [blue](#) is a hyperlink to outside source.
 It will print landscape by default, but you can change (in your print dialog box) to print portrait if preferred. This will give you ample white space to make notes.

[FOR PROBLEMS WITH THIS DOCUMENT OR TO REPORT A MISSING/BROKEN LINK, CLICK HERE](#)

Washington Department of Commerce: Rogers Weed, Director

Local Government and Infrastructure Division: Karen Larkin, Assistant Director

Growth Management Services Unit: Leonard Bauer, Managing Director

Lead Author: Bruce Hunt

Contributors:

Leonard Bauer

Dee Caputo

Dave Andersen

Table of Contents

Table of Contents	1
Executive Summary	5
Introduction: Helping Communities Shape Their Future.....	9
Chapter 1: Urban Growth Areas and Urban Services	13
Land Use and Designation of UGAs.....	15
Urban Services and Levels of Service.....	16
Challenges in Designating UGAs: Other Stakeholders and Tools	18
Growth Management Hearings Board Cases.....	20
Helpful Guidance from the Washington Administrative Code.....	25
Greater Efficiencies in Difficult Times.....	26
Endnotes	28
Chapter 2: Cost of Urban Services in Urban Growth Areas.....	30
GMA Statutes.....	31
Helpful Guidance from the Washington Administrative Code.....	32
Growth Management Hearings Board Cases.....	34
Local Examples	35
Who Pays for Urban Services.....	42
Endnotes	43
Chapter 3: Tools to Manage Urban Growth Areas.....	45

GMA Statutes	46
Helpful Guidance from the Washington Administrative Code	48
Growth Management Hearings Board Cases	49
Development Regulation Tools	50
Transfer of Development Rights	53
Local Examples	54
Endnotes	58
Chapter 4: Population Projections for Urban Growth Areas	61
GMA Statutes	65
Helpful Guidance from the Washington Administrative Code	67
Growth Management Hearings Board Cases	67
Court Cases	70
Coordination for Population Planning	71
Local Examples	72
Endnotes	80
Chapter 5: Land Capacity Analysis and Buildable Lands Program for Urban Growth Areas	82
Land Capacity Analysis Methodology	84
GMA Statutes	87
Helpful Guidance from the Washington Administrative Code	88
Growth Management Hearings Board Cases	89
Court Cases	92
Local Examples	93

Endnotes.....	117
Chapter 6: Housing Market Conditions – Healthy Transportation Opportunities in Urban Growth Areas	120
GMA Statutes.....	121
Helpful Guidance from the Washington Administrative Code.....	122
Growth Management Hearings Board Cases.....	123
Housing Element Examples	126
Housing Market Conditions	131
Transportation Opportunities	133
Other Innovative Housing and Transportation Resources	135
Endnotes.....	136
Chapter 7: Procedural Process – Public Participation – SEPA for Urban Growth Areas	138
GMA Statutes.....	139
Helpful Guidance from the Washington Administrative Code.....	140
Growth Management Hearings Board Cases.....	141
Procedural Process.....	150
Local Examples	153
Integrating the SEPA and the GMA	158
Other Procedural – Public Participation – SEPA Resources	160
Endnotes.....	160
Chapter 8: Implementation – Monitoring – Indicators and Benchmarks for Urban Growth Areas	162
GMA Statutes.....	164
Helpful Guidance from the Washington Administrative Code.....	167

Growth Management Hearings Board Cases 168

Local Examples 171

Endnotes181

Appendix A: State Environmental Policy Act (SEPA) 184

Integrating the SEPA and the GMA 184

Principles for Integrating SEPA and GMA 185

GMA Non-Project Review 186

Adopting the GMA Document 189

Planned Actions 191

Executive Summary

“If you want to know your future, look at what you are doing in this moment.”

-Proverb

Planning for Urban Growth Areas (UGAs) is an important tool provided by the Growth Management Act (GMA) for deciding where future urban growth should be encouraged, where the extent of that growth should be located, and how the financial and environmental responsibilities that come with growth, will be met.

UGAs are areas where growth and higher densities are expected and that can be supported by cost-effective urban services. By directing growth into urban areas, counties and cities can also protect critical areas, conserve their natural resource lands – such as farms and forests – and maintain the rural character of their rural lands.

The GMA requires early and continuous public involvement and consideration of proposals and alternatives for Comprehensive Plan updates. This is particularly appropriate when updating UGAs, which typically involves a multi-stage process in which a range of choices are considered, including new growth forecasts, new land use designations - potentially involving multiple properties over broad areas, changes to capital facilities plans, new regional transportation plans, and environmental analysis for potential impacts and mitigation strategies.

A collaboration process between a county and its cities is also required by the GMA, to select a 20-year countywide population projection from a range of population projections provided by the state Office of Financial Management (OFM). The selected OFM countywide population projection together with a locally determined countywide employment projection is allocated among UGAs. UGAs must be sized with sufficient land to accommodate the allocation.

Setting a realistic population projection to plan for twenty years of potential growth can ensure adequate amounts of land and services are planned for UGAs. Planning with an inflated population number can result in oversized UGAs that facilitate more growth than local governments can afford to provide with necessary urban services.

The major consequence of uncoordinated and unplanned growth is sprawl, the most expensive form of development to provide with urban services. The GMA and local Comprehensive Plan goals and policies, together with implementing Development Regulations, enable citizens and elected officials to make choices that can create affordable and healthy communities.

UGAs are designated in the Land Use Element of Comprehensive Plans. A companion Element for aligning UGAs to urban services is the Capital Facilities Element and its associated detailed Capital Facilities Plan. The Capital Facilities Plan communicates

- an inventory of existing urban services,
- what urban services will be needed to support build out of urban areas,
- a prioritization of urban services,
- what the costs of urban services will be, and
- how these urban services will be funded to support the UGA during a 20-year planning horizon.

The GMA requires that the land use plan for UGAs and the Capital Facilities Plan be consistent. Consistency means that the footprint of the land use plan matches the footprint of a jurisdiction's ability to provide the urban services shown in its Capital Facilities Plan. The two plans must align.

Few cities and counties have a clear assessment of actual expenditures required to serve growth in an UGA, as well as allocating some cost to replace aging infrastructure in the UGA - over the long term. With fewer local revenue dollars and declining State funding - combined with aging urban infrastructure, it is imperative that wise planning for UGAs match each community's ability to provide and pay for urban services.

To ensure that Urban Growth Areas are appropriately sized to the Capital Facilities Plan, infrastructure stakeholders need to be part of the planning process for UGAs early on, to ensure consistency exists between the Capital Facilities Plan and the land use plan for urban areas. Local Public Works divisions, local budget personnel, special purpose districts, Public Utility Districts, bond underwriters, private engineering firms, and citizens - can provide important data. This data can help determine the capital costs of urban infrastructure, operation and maintenance costs, and how many ratepayers and what funding sources will be needed to make the long-term payments for the urban services needed for UGAs.

Counties and cities utilize a Land Capacity/Quantity Analysis (LCA) to determine the amount of vacant, partially used, under-utilized lands, and redevelopment potential of built properties, to accommodate growth. Counties and cities utilize a LCA to determine if existing or potential UGAs can accommodate twenty years of urban growth.

In addition to providing sufficient capacity of land and land use designations related to urban growth, urban densities also need to be established that will accommodate projected growth. UGAs need to include greenbelt and open space areas, a variety of housing types, and may include a reasonable land market supply factor. The GMA enables counties and cities to exercise discretion in their Comprehensive Plans to make choices on how they plan to accommodate growth. Some growth will naturally occur in rural areas. However, the primary purpose of the LCA methodology is to assist in determining the adequacy and sizing of UGAs to achieve the goals of the GMA for balanced urban development with adequate and cost-efficient urban services.

A LCA can also be used to determine whether counties and cities are able to meet the GMA goals and requirements to provide for a range of housing types and densities for all economic segments of the population. Having an appropriate land supply within UGAs is paramount to meet the GMA's requirement for accommodating twenty years of potential growth. In order to determine whether counties and cities have appropriate land in UGAs, a land use inventory must be conducted to determine if the available land supply aligns with the anticipated 20-year population and employment growth projection.

Many cities and counties fully planning under the GMA have implemented flexible development regulation tools that achieve densities to maximize use of available urban land and economize the costs for providing urban services. In addition, these densities support various types of housing, multi-modal transportation systems, and other public services that are cost prohibitive with low density development.

The housing policies of a Comprehensive Plan together with the Development Regulations that implement those policies can influence the development capacity of an UGA over the 20-year planning horizon. Policies that promote a mix of housing types for all income levels, combined with flexible regulations for density, innovation and design, infill, and redevelopment, can help maximize the use of available urban lands as well as generate revenues to pay for needed urban services and transportation systems.

Recent studies show that people will drive less and use healthy modes for transportation when they live closer to work and recreational opportunities. Consistency between the land use element, the housing element, and the transportation element in Comprehensive Plans, can help create walkable and transit friendly communities

with a vibrant mix of housing and businesses. This type of compact development also translates into lower infrastructure costs, lower greenhouse gas emissions, and overall lower energy costs. As an added bonus, this type of development maximizes the capacity of land in UGAs and enhances the financial resources of local jurisdictions to pay the cost of providing urban services.

Those counties and cities required to plan under the GMA must also adopt Development Regulations to implement their Comprehensive Plan goals and policies. Local regulations that implement Comprehensive Plan goals and policies can include; zoning and building codes, subdivision and binding site plan ordinances, critical areas and shoreline ordinances, capital improvement plans and concurrency ordinances, and other techniques to implement planning policies. Countywide Planning Policies and inter-local agreements can also implement regulations for UGAs. Inter-local agreements assure coordination and consistency between neighboring jurisdictions, service providers, and agencies for providing urban services to UGAs.

Most jurisdictions fully planning under the GMA have programs to measure the performance of their respective goals and policies with local indicators, monitoring, and analysis of whether indicators are aligning with desired benchmarks. Results from these types of programs yield accurate and reliable performance data that supports policy making to achieve each community's desired future.

Enabled by the GMA, counties and cities across the State of Washington are better equipped to manage growth with UGAs, protect critical areas and conserve their resource lands, provide for rural living – open space – and recreational areas, enhance their transportation systems to reduce congestion and create healthy alternative modes of travel, and revitalize their downtowns with attractive compact development. The GMA continues to empower communities to realize their future and to manage growth in a manner which makes sense for each community.

Introduction

Helping Communities Shape Their Future

Since the Growth Management Act (GMA) was passed by the Legislature in 1990, Washington counties and cities have utilized the GMA's planning framework to adopt Comprehensive Plans and Development regulations to guide where Urban Growth Areas (UGAs) should be and to provide these urban areas with adequate and affordable urban services. Enabled by the GMA, counties and cities have also been better equipped to: protect critical areas and conserve resource lands; provide for rural living – open space – and recreational areas; enhance transportation systems to reduce congestion and create healthy alternative modes of travel; and revitalize downtowns with attractive compact development. The GMA continues to empower communities to manage their growth in a manner which makes sense for each community.

In March 1992, the Department of Commerce developed the following set of guidance documents for designating UGAs under the Growth Management Act (GMA): “Issues in Designating Urban Growth Areas – Part I” and “The Art and Science of Designating Urban Growth Areas – Part II.”

These early UGA guidebooks primarily focused on designating UGAs to accommodate population projections, outlining a methodology to determine the amount of vacant, partially used, and underutilized lands available for growth, and providing guidance on appropriate densities and uses for urban, rural, and resource lands.

This 2012 UGA Guidebook is the first complete update to the original 1992 UGA guidance documents. Commerce's new UGA Guidebook emphasizes the importance of aligning UGAs with Capital Facilities Plans to provide cost effective and well timed provision of urban services. With fewer local revenue dollars and declining State funding - combined with aging urban infrastructure, it is imperative that wise planning for Urban Growth Areas match each community's ability to provide and pay for urban services.

Chapters of the new UGA Guidebook build upon the 1992 guidebooks by including: amendments to the GMA statutes related to UGAs; recently adopted UGA administrative rules; relevant Hearings Board and Court cases; example UGA and CFP planning work from Washington counties and cities; and knowledgeable comments from local government officials, planning practitioners and the public - regarding designation and update of their UGAs.

Establishing UGAs is a major step under the GMA that local communities take in managing their growth. Local communities must design UGAs to include "areas and densities sufficient to permit the urban growth that is projected to occur in the county or city for the succeeding twenty-year period" (RCW 36.70A.110(2) and WAC 365-196-310). UGAs must also be designed so that urban services can be provided during the 20-year planning horizon.

UGAs are areas designated by a county, in collaboration with its cities and towns, as to where urban development will occur. This process begins with consultation between a county and its cities and towns to select a population growth forecast from a range of population growth forecasts provided by the state Office of Financial Management (OFM). The population forecast together with a county employment growth forecast is then allocated primarily to UGAs, to assist in sizing UGAs to accommodate future urban growth. A portion of the overall county population growth can be accommodated in rural areas.

The process of designating UGAs is an important tool provided by the GMA for deciding where urban development should be encouraged and where the extent of that development should be located. UGAs are areas where growth and higher densities are expected and supported by urban services. By directing growth into urban areas, counties and cities can also conserve natural resource lands – such as farms and forests – and maintain the rural character of rural lands.

Incorporated cities and towns are by definition UGAs. The GMA (RCW 36.70A.110(3)) states that urban growth should be located:

10

- First, in areas already characterized by urban growth that have adequate existing public facility and service capacities to serve such development,
- Second, in areas already characterized by urban growth that will be served adequately by a combination of both existing public facilities and services and any additional needed public facilities and services that are provided by either public or private sources, and
- Third, in the remaining portions of the urban growth areas. Urban growth may also be located in designated new fully contained communities as defined by RCW 36.70A.350.

UGAs are to be designed to provide for efficient and cost effective urban services. Growth can be phased to accomplish this task, with short-term growth encouraged closer to the existing urban center and close to important services such as; sewer – water – transportation – schools and parks, with other areas reserved for growth later in the 20-year plan.

Counties in the state that are fully planning under the GMA have completed their first round of Comprehensive Plans, Development Regulations, and UGAs under the act. As part of this work, they developed criteria and made decisions about UGAs, rural lands, resource lands, and critical areas.

Establishing UGAs under the GMA has also helped cities with the annexation process. When counties and cities agree on UGAs, local governments and citizens know where annexations will occur, reducing public controversy and providing predictability.

Six counties are in the Buildable Lands Program (Clark, King, Kitsap, Pierce, Snohomish, and Thurston) and have special requirements related to UGAs (RCW 36.70A.215). These counties are gathering data on the density and type of development that is occurring. This information is to be compared to the density and type of development expected, as identified in local Comprehensive Plans. If gaps are found in this analysis, measures are to be adopted that will increase consistency during the next update period. Policy techniques, other than adjusting urban growth boundaries, are to be used first to achieve consistency between planned development and actual development patterns.

Initial reports developed by the counties in the Buildable Lands Program addressed whether their UGAs contain adequate development capacity to accommodate the state population forecast as well as projected employment growth for their area. Residential, commercial, and industrial land uses were analyzed. All county

reports indicate that their overall UGAs have adequate capacity to meet growth demands as indicated in their adopted Comprehensive Plans.

Washington communities fully planning under GMA should be monitoring their UGAs to determine if they are properly sized. If growth is occurring at lower densities than planned, measures need to be adopted that will increase consistency. Monitoring provides important data to make policy decisions on sizing UGAs and accommodating UGAs with cost effective urban services - consistent with a community's Capital Facilities Plan, Capital Improvement Programs and annual budget.

At least every eight years, jurisdictions are required to review UGAs. This review should evaluate planned densities and growth with actual densities, and make changes if needed. RCW 36.70A.130 and WAC 365-196-610 provide the timelines for communities in Washington State to review and update their Comprehensive Plans, Development Regulations, and UGAs. A county Comprehensive Plan designating UGAs and the densities permitted in the UGAs by the Comprehensive Plan of the county and each city located within UGAs may need to be revised to accommodate potential urban growth projected to occur in the county for the succeeding 20-year period.

Changes to UGAs must also be consistent with adopted "County-Wide Planning Policies." The policies, adopted by counties, set the general framework for coordinated land use planning between the county and its cities to ensure respective Comprehensive Plans are consistent with each other. Agreements between a county and its cities can cover matters such as joint planning within UGAs, agreement on annexation policies, adoption of development standards within UGAs, phasing strategies on development until urban services are in place, revenue sharing for regional services, and city and private service provider review and comment on major development within UGAs. County-Wide Planning Policies should be reviewed on a regular basis to ensure consistency with changes in State law and to reflect current information and planning practices.

To plan for growth, local communities need a thorough understanding of recent statutes and rules related to UGAs, of their own Countywide Planning Policies, Comprehensive Plans, Development Regulations, Capital Facilities Plans and any amendments to these plans since initial adoption of their UGAs. Communities will continue to need a public participation program, SEPA integration, cooperation and coordination between communities, knowledge of what land is realistically developable, available, and suitable for growth within their communities, and what the feasibility and realistic costs of urban services will be to support Urban Growth Areas at the levels of intensity planned.

Chapter 1

Urban Growth Areas and Urban Services

The Growth Management Act (GMA) provides statutory authority for local governments to plan in Washington State. The process of designating Urban Growth Areas (UGAs) is an important tool provided by the GMA for communities to decide where urban development should be encouraged and where the extent of that development should be located .¹ UGAs are areas where growth and higher densities are expected and supported by urban services. RCW 36.70A.030(19)(20) defines urban growth as follows:

"Urban growth" refers to growth that makes intensive use of land for the location of buildings, structures, and impermeable surfaces to such a degree as to be incompatible with the primary use of land for the production of food, other agricultural products, or fiber, or the extraction of mineral resources, rural uses, rural development, and natural resource lands designated pursuant to RCW 36.70A.170. A pattern of more intensive rural development, as provided in RCW 36.70A.070(5)(d), is not urban growth. When allowed to spread over wide areas, urban growth typically requires urban governmental services. "Characterized by urban growth" refers to land having urban growth located on it, or to land located in relationship to an area with urban growth on it as to be appropriate for urban growth. "Urban growth areas" means those areas designated by a county pursuant to RCW 36.70A.110.

Incorporated cities and towns are by definition UGAs. The GMA (RCW 36.70A.110(3)) states that urban growth should be located:

- First, in areas already characterized by urban growth that have adequate existing public facility and service capacities to serve such development,
- Second, in areas already characterized by urban growth that will be served adequately by a combination of both existing public facilities and services and any additional needed public facilities and services that are provided by either public or private sources, and
- Third, in the remaining portions of the urban growth areas. Urban growth may also be located in designated new fully contained communities as defined by RCW 36.70A.350.

UGAs are to be designed to provide for efficient and cost effective urban services. Growth can be phased to accomplish this task, with short-term growth encouraged closer to the existing urban center and close to important services such as sewer, water, transportation, schools and parks. Other portions of UGAs can be reserved for growth later in the 20-year plan.

A companion tool for aligning growth in UGAs to urban services is the Capital Facilities Plan/Element (CFP). The CFP typically communicates:

- an inventory of existing urban services,
- what urban services will be needed to support build out of a UGA,
- prioritization of urban services,
- an estimate of what the costs of urban services will be, and
- a plan for how these urban services will be funded to support the UGA during a 20-year planning horizon.

This chapter of the guidebook explains:

- the importance of integrating capital facilities planning early in the land use planning process for UGAs,
- the requisite parts of a CFP,

- what urban services are and how levels of service are determined,
- challenges in designating UGAs and developing CFPs,
- Growth Management Hearings Board cases related to UGAs and CFPs,
- new Washington Administrative Code (WAC) guidance for urban services and CFPs, and
- the need for wise planning strategies to achieve greater efficiencies amidst growing infrastructure needs and declining revenues.

“Infrastructure systems keep cities clean, safe and livable. The sophistication and scale of capital facilities owned and operated by Washington’s largest cities are often different from the systems that serve a town with a population of several hundred (or thousand). But every city, of every size, is responsible for providing a basic infrastructure that ensures the safety of the people drinking its water, supports a vibrant economy, and sustains a healthy natural environment.”

Land Use and Designation of UGAs

The Land Use Element of a comprehensive plan is where the designation of UGAs is established for the 20-year planning horizon. Generally, UGAs are where cities will grow during the planning horizon. There are, however, unincorporated urban areas that existed prior to the GMA that also met the criteria for designation as an UGA. These UGAs may eventually become annexed or incorporated, or remain as unincorporated UGAs.

One of the best ways to make a future land use plan come true is to use investments in public facilities to reinforce the plan. The community should invest in new roads, sewer and water lines and other facilities where it wants growth to occur. It should refuse to make investments in areas where it does not want growth to occur.” (Association of Washington Cities (AWC), 2011)

Designation or expansion of an UGA is a planning commitment by the jurisdiction(s) to provide urban services during the 20-year planning horizon. This commitment to provide urban services is established by County-Wide Planning Policies (RCW 36.70A.210), county and city comprehensive plans, urban zoning and other development regulations, and CFPs. Areas outside of UGAs must remain rural in character and are not planned to receive urban services.

When Local Project Review² is conducted for a proposed development project in an UGA based upon local development regulations, the commitment to provide urban services becomes irrevocable. When a development project in an UGA is permitted it is conditioned on a determination of availability and adequacy of urban services.

“Public facilities and services. Ensure that those public facilities and services necessary to support development shall be adequate to serve the development at the time the development is available for occupancy and use without decreasing current service levels below locally established minimum standards.”³

Urban Services and Levels of Service

There are urban services required to be available when urban growth and urban densities are permitted to occur in UGAs. These services typically include public sewer, public water, transportation, and stormwater. As UGAs develop and as population numbers reach levels that can pay for additional urban services (e.g. police and fire, libraries, schools, and parks) then a full set of urban services can be achieved for UGAs. These are the types of urban services that need to be documented in the CFP.

Local comprehensive plans or countywide planning policies can establish Levels of Service (LOS) for urban services. LOS is a locally defined measurement that describes minimum thresholds of urban services. For example, LOS can be expressed in many ways, such as gallons per day of waste water or drinking water per person or household, emergency personnel per thousand residents, acres of park land per thousand residents, square feet of library or school facilities per thousand residents, an industry standard for a given urban service area (e.g. equipment type or response time), or a functional rating (e.g. road capacity v. volume of traffic).

In addition, many jurisdictions have adopted concurrency ordinances for various urban services to ensure that development does not cause LOS to drop below adopted standards, as well as to provide strategies to mitigate

the impacts of development. RCW 36.70A.070(6)(b) requires concurrency for transportation systems; however, many jurisdictions have also adopted standards for public sewer and water systems.

“Concurrent with the development” means that improvements or strategies are in place at the time of development, or that a financial commitment is in place to complete the improvements or strategies within six years. Local governments have flexibility regarding how to apply concurrency within their plans, regulations, and permit systems.⁴

The CFP should include a reasonable plan for extending a local government’s 6-year Capital Improvement Program (CIP) to years 7 through 20.⁵ The 6-year CIP is typically updated each budget year with new capital projects. The CIP is integral to the local government’s budget cycle.⁶ A local government that has its budget linked to its 6-year CIP, and its CIP linked to its 20-year CFP, has integrated its short and long-term capital improvement plans, operations and maintenance plans, and financial plan to support updates to its comprehensive plan and UGA.

Simply put, a CFP is an inventory of what a you currently have for urban services, what you will need to support your 20-year land use plan and UGA, what it costs to provide these services, and where the money will come from. The CFP analysis is in reality, a budget exercise, and one that local governments should perform with their rolling 6-year CIP – together with their annual budget cycle.” (Infrastructure Assistance Coordinating Council (IACC), 2011)

RCW 36.70A.070 requires that the land use plan and the CFP be consistent. Consistency means that the footprint of the land use plan matches the footprint of a jurisdiction’s ability to provide the urban services shown in its CFP. The two plans must align. Monitoring and feedback from both plans will empower policy makers to utilize adaptive management strategies to make adjustments to UGAs and the supporting CFP consistent with the timelines provided by the Legislature in RCW 36.70A.130.

Challenges in Designating UGAs: Other Stakeholders and Tools

Some jurisdictions have experienced challenges in the designation and/or update of UGAs due to using overly optimistic population forecasts to leverage oversized UGAs. Challenges have come when jurisdictions have not been able to show in their CFPs how they can provide and finance the necessary urban services to support oversized UGAs. Other challenges arise for small communities with limited storm water or sewer systems that plan to adopt urban densities. Planning for urban development and densities must be supported by urban services. Conversely, if a community is not planning for additional future urban development and densities, then existing and historical services may be adequate to serve the community needs. Appropriately sized and approved package plants for water, storm water and sewer systems may be viable for small communities with compatible land use plans.

"Urban governmental services" or "urban services" include those public services and public facilities at an intensity historically and typically provided in cities, specifically including storm and sanitary sewer systems, domestic water systems, street cleaning services, fire and police protection services, public transit services, and other public utilities associated with urban areas and normally not associated with rural areas.⁷

To ensure that UGAs are appropriately sized to the CFP, infrastructure stakeholders need to be part of the planning process for UGAs early on, to ensure consistency exists between the CFP and the land use plan for UGAs. Local public works staff, budget personnel, special purpose districts, public utility districts (PUDs), bond underwriters, private engineering firms, and citizens can provide important data. These data can help determine the capital costs of urban infrastructure, operation and maintenance costs, and how many ratepayers and other funding sources will be needed to make the long-term payments for the urban services needed for UGAs.

"Infrastructure should be part of the larger conversation about 'what do you want government to do and how do you want to pay for it?'" Jay Zuckerman, Ernst & Young (II)

The GMA provides important tools for managing growth in UGAs and for making it possible to align the provision of urban services through a balanced growth plan that relies on predictable revenue sources. Some of the available tools include the following:

- Phasing development within UGAs by assigning zoning designations that can reserve areas for future urban development until services can logically and economically be extended during the 20-year planning period. For example, development regulations could include holding districts in the UGA that allow one dwelling per ten, twenty or forty acres until urban services become available. When urban services can be provided and any other locally established criteria are met, these holding districts could be rezoned or automatically allow for urban densities to accommodate planned growth.
- If the population planned for an UGA is not growing as expected, reducing the UGA area to reduce the commitment to serve the original area and, thereby, lower the total cost of urban services. UGAs may be reduced as needed to ensure that the land use plans do not exceed the capacity of capital facilities plan to serve overall growth, but UGAs must still be capable of accommodating adopted population growth projections. Population growth projections for each UGA can also be adjusted, but countywide population targets must be within the forecast range provided by State of Washington Office of Financial Management (OFM).
- Reducing the LOS for urban services is another tool that can spread out the available capital project funding to match the current land use plan. Care needs to be exercised when lowering LOS, as jurisdictions may have adopted specific LOS in their Countywide Planning Policies, comprehensive plans, and development regulations. LOS in these plans and regulations may need to be amended to accomplish lowering the levels of services and communicating lower LOS to citizens.
- Impact fees can help offset some of the capital costs of urban facilities but are not allowed to cover the long-term operation and maintenance costs.
- Phasing and implementing a mix of zoning and densities - that could include mixed use, commercial, and industrial - to enhance the tax base to pay for services and create long-term revenue sustainability.

“Financial policies also play a crucial role in redevelopment. Many cities in our region have successfully pursued financial policies that anticipate future revenue from redevelopment as a basis to finance facilities to stimulate that redevelopment. Policies relating to the formation of local improvement districts can play a significant role in encouraging or discouraging how this financial tool might be used in redevelopment. In many cases, it may be appropriate to focus the jurisdiction’s available fiscal resources into stimulating infill in the developed area, requiring developments in undeveloped areas to finance the facilities themselves.”
(Dugan, 2008)

- Adopting policies to direct growth to vacant and underutilized areas that already have existing urban services. Saturating a large vacant-land market with more land for development will not create the incentives needed to utilize these vacant or underutilized areas that have available urban services. Often, these types of vacant commercial or industrial areas can benefit from subarea planning and revitalization – providing not only a catalyst for further investment and redevelopment, but producing a stable revenue stream from ratepayers who utilize the existing infrastructure.

Growth Management Hearings Board Cases

Several important Growth Management Hearings Board cases underscore the need to have up-to-date CFPs to support initial designation and subsequent updates of UGAs. The following case summaries are reprinted from Hearings Board digests. Full texts of cases should be consulted and may be obtained from the Hearings Board website at www.gmhb.wa.gov

The Board has reiterated the importance of capital facility planning, by all entities, when a County is setting UGA boundaries. The County must be sure that the areas within the UGAs will have adequate and available urban services provided over the 20-year planning period – otherwise, the UGAs must be adjusted or other remedial measures taken (Citations omitted). . . . [While the Board’s analysis has focused on sewer services, other capital facilities may be similarly deficient in providing services to existing residents in the UGA. The CFE

must take into account, through its inventory and plan, the urban services needed throughout the UGA, not just on its developing fringe, over the 20-year planning period. [Suquamish II, 07-3-0019c, FDO, at 20-26.]

The Board has long held that these two requirements [RCW 36.70A.070(3)(b) and 36.70A.110(3)] read together obligate counties and cities to include in the comprehensive plan's capital facilities element the proposed locations, capacities, and funding for the 20-year planning period covered by the comprehensive plan. Skagit County Growthwatch v. Skagit County, Case No. 07-2-0002, FDO at 17 (Aug. 6, 2007)

There must be urban levels of sanitary sewer provided to the entire UGA [by the end of the planning period], not within 20 years of the date of subsequent approval of development on holding tanks. This is because the designation of areas for urban growth must ensure that urban services are available when the urban growth occurs. The UGA boundaries may only extend as far as urban levels of service are ensured for the planning period. If urban services cannot be provided in the planning period, then the areas which cannot be served should not be designated for urban growth, i.e. included in the UGA. Moreover, if urban levels of service will not be provided at the time of development, development must be phased so that there are not urban levels of development until urban services are provided. In the meantime, the development that does occur within the UGA must allow for eventual urban densities, typically by platting and locating initial growth so that higher densities will be available as urban services are available. Skagit County Growthwatch v. Skagit County, Case No. 07-2-0002, FDO at 62-63 (Aug. 6, 2007)

Because non-municipal UGAs may allow an extension of urban growth to areas that do not already have a governmental structure for the provision of urban levels of service, it is important to have a plan for the provision of urban services to the entire non-municipal UGA. If this cannot be done, the boundaries of the non-municipal UGA are likely too large. Irondale Community Action Neighbors, et al. v. Jefferson County, WWGMHB Case No. 04-2-0022 (FDO, May 31, 2005) and Irondale Community Action Neighbors v. Jefferson County, WWGMHB Case No. 03-2-0010 (Compliance Order, 5-31-05)

The fact that water and sewer facilities are provided by non-county serving agencies does not relieve the county of including the budgets and/or plans in its analysis of the proper location of an UGA. Durland v. San Juan County 00-2-0062c (FDO, 5-7-01)

Public sanitary sewer is a key urban governmental service (RCW 36.70A.030[19]). Creating a non municipal UGA to acknowledge preexisting growth is only responsible if urban levels of services are provided within that non-municipal UGA. Irondale Community Action Neighbors, et al. v. Jefferson County, WWGMHB Case No. 04-2-0022 (FDO, May 31, 2005) and Irondale Community Action Neighbors v. Jefferson County, WWGMHB Case No. 03-2-0010 (Compliance Order, 5-31-05)

The words “any additional needed public facilities and services that are provided by either public or private sources” (RCW 36.70A.110(3)) show that the public facilities and services for urban growth can be provided by private entities and still be considered urban governmental or urban services. Whidbey Environmental Action Council v. Island County 03-2-0008 (FDO, 8-25-03)

Compliance with the language of a local government’s own ordinance is required before compliance with the GMA can be achieved. The availability of public water services only, without public sewer and other urban services, does not provide the basis for logically-phased and efficiently-served urban development. ICCGMC v. Island County 98-2-0023 (RO 7-8-99)

The GMA anticipates development phasing that is linked to the availability of public infrastructure. That linkage may be spatial, with development allowed first in the locations already served by public services and then following the extension of those services, [RCW 36.70A.110(3)], or the linkage may be temporal, with development timed to match an infrastructure investment plan [RCW 36.70A.070(6) and .020(12)]. The phasing provisions of the GMA allow a jurisdiction to “manage” and guide growth both locationally and temporally. However, such phasing is inextricably linked to the availability and adequacy of the necessary infrastructure to support that growth. The GMA never contemplates development phasing that is purely random, with one’s rights to develop under the adopted Plan designations and zoning dependent on the luck of the draw. [The City’s growth phasing lottery is a random system, not based on geographic or spatial linkage or timed with infrastructure availability.] [Camwest III, 05-3-0041, FDO, at 15 -18.

UGA expansions based upon a noncompliant, invalid Capital Facilities Element do not comply with the GMA’s directive that necessary and adequate public facilities and services be available within the UGA. The Capital Facilities Element and Land Use Element, especially UGA expansions, are inextricably linked. (Citation omitted).

A UGA expansion cannot be sustained if there is no provision for public facilities and services being adequate and available to support existing development as well as the planned-for-development. [Suquamish II, 07-3-0019c, 9/13/07 Order, at 4.]

As a threshold question, the Board addresses whether the Board's FDO was limited only to the proposed UGA expansion areas, or whether the remand pertained to the entire area of the UGAs, including existing areas. In short, assessment of the ability to provide sanitary sewer services to a proposed expansion area for a UGA requires that service provider(s) evaluate the UGA as a whole, including existing as well as proposed expansion areas. [Suquamish II, 07-3-0019c, 6/5/08 Order, at 10.]

If a county designates a UGA that is to be served by a provider (other than the county), the county should at least cite, reference or otherwise indicate where locational and financing information can be found that supports the UGA designations and GMA duty to ensure that adequate public facilities will be available within the area during the twenty-year planning period. [Bremerton/Port Gamble, 95-3-0039/97-3-0024c, 9/8/97 Order, at 41.]

A county may, as an optional and supplementary feature of its comprehensive plan, include a population projection for any year subsequent to 2012, provided that such supplementary projection is unrelated to the process of designating UGAs. It may be wise to look beyond the GMA-mandated twenty-year time horizon, in view of the fact that major capital investments, i.e., sewage treatment plants and transportation facilities such as roads, airports and rail lines, have well beyond a twenty-year life and the results of certain public policy decisions will likewise endure beyond twenty years. However, the land supply and density decisions that must be made in designating UGAs must accommodate only the demands of twenty years of growth. [Kitsap/OFM, 94-3-0014, FDO, at 23.]

The Board can conceive of appropriate urban densities below 4 du/acre where a city is balancing its GMA duties to provide adequate urban services and facilities with its duty to provide urban densities. Thus, it is conceivable that if a city has an explicit phasing program that sequences and times the provision of urban services and facilities to coincide with the jurisdiction's capital facilities and transportation financing plans and programs, lower densities in some areas may be appropriate for an established time horizon, particularly if offset by much higher densities where capital facilities are already in place. [Kaleas, 05-3-0007c, FDO, at 20.]

- [to table of contents](#)
- [next chapter](#)
- [endnotes](#)

The Board cannot reiterate enough the importance of capital facility planning, by all entities, when a County is setting UGA boundaries. Kittitas County must ensure the areas within the entire UGAs, both existing and expansion areas, will have adequate and available urban facilities provided over the 20-year planning period. The area impacted by the proposed applications, Nos. 06-03 and 06-04, is not within the jurisdictional limits of the City of Kittitas, but is located in what would be deemed the unincorporated portion of the UGA. It is the County, not the City, that is responsible for ensuring capital facilities within this area ... If the County wishes to rely on the City to satisfy this responsibility, it is still required to demonstrate to the Board that the necessary infrastructure to serve the UGA expansion area will be available during the 20-year planning horizon. As with the LCA, simply citing to the City's CP, without more, fails to demonstrate compliance. *Kittitas County Conservation, et al. v. Kittitas County*, EWGMHB Case No. 07-1-0004c, Compliance Order at 34-35 (Aug. 7, 2008).

The phrase "existing needs" from RCW 36.70A.070(3)(e) refers not only to the construction of new or expanded capital facilities that can be currently identified as needed, but also the maintenance of existing capital facilities. . . . Determining the appropriate level of maintenance for capital facilities falls within the local government's discretion. [WSDF I, 94-3-0016, FDO, at 47.]

The crux of Petitioner's argument is that the CFP must distinguish between maintenance projects (rehabilitation/replacement) and those necessary to accommodate growth (new or expanded facilities). In WSDF I, the Board concluded that a CFP must not only address the construction of new or expanded facilities but also, as a sound planning principle, the major maintenance of existing capital facilities. (Citation omitted). Although the City has the discretion to separate maintenance projects from new capital facility projects within its CFP, at no time has the Board held that a CFP must distinguish between major maintenance projects and new projects, as both are necessary to support development of the community. . . This Board has never held, nor will it now hold, that minor, routine maintenance be included within a CFP. . . RCW 36.70A.070(3) does not mandate that major maintenance projects be distinguished from new/expanded facilities projects. Rather the CFP must incorporate both, and the City has done so. [Fallgatter IX, 07-3-0017, FDO, at 11.]

Helpful Guidance from the Washington Administrative Code

Commerce updated the Washington Administrative Code (WAC) for the GMA in 2010 with new sections added for guidance on providing urban services for UGAs and developing Capital Facilities Plans to support UGAs. The following sections are brief summaries of the urban services and CFP sections of WAC 365-196. Complete sections of the Code can be accessed at: <http://apps.leg.wa.gov/WAC/default.aspx?cite=365-196>

WAC 365-196-320 Providing urban services

- (1) Urban governmental services. This section of the WAC provides a list of urban services as well as an expanded list of additional public facilities and services associated with urban areas. Guidance is also provided on; the need for adequate urban services with density, differences between urban and rural services, the obligation an UGA makes to provide services, and limited exceptions where on-site systems could be utilized.
- (2) Appropriate providers. This section of the WAC describes the various providers of urban services as well as guidance on the transformation of governance and services if annexation or incorporation occurs in an UGA.
- (3) Coordination of planning in urban growth areas. This section of the WAC describes the consistency needed between the CFP and the Transportation Element in the comprehensive plan along with the need to document who the service provider(s) will be.
- (4) Level of financial certainty required when establishing urban growth areas. This section of the WAC provides guidance for an analysis of urban services for amendments to UGAs, keeping CFPs up-to-date and consistent with the land use element, cost estimates and funding sources for services in new UGAs, and strategies to address a lack of funding for urban services.

WAC 365-196-415 Capital facilities element

- (1) Requirements. This section of the WAC describes; what facilities must be included in the CFP, what the future facilities needs will be, together with a plan for the locations and capacities of the facilities, a financial plan to underwrite the needed capital facilities, and a requirement to reassess the land use element if funding is not adequate.
- (2) Recommendations for meeting requirements. This section of the WAC provides recommendations for; an inventory of existing facilities, an inventory of what facilities will be needed in the future to address deficiencies

and provide for new facilities, a financial plan to underwrite deficiencies and new facilities, and reassessment if the probable funding falls short or if public facilities are inadequate. In addition, this section recommends that update of the CFP inventory should coincide with the periodic review and update schedule in RCW 36.70A.130.

(3) Relationship between the capital facilities element and the land use element. This section of the WAC provides guidance on a jurisdiction's responsibility to plan for growth with sufficient urban land that permits urban densities and intensities as well as having a supporting CFP that aligns with the land use plan – for new facilities to accommodate new growth and operation and maintenance of existing systems in UGAs.

(4) Relationship to plans of other service providers or plans adopted by reference. This section of the WAC provides guidance to counties and cities to ensure that if they are not the service provider and are adopting service plans by others, that a county or city should include the plan within its CFP and show that the cumulative services from various providers demonstrate that facilities will support the land use plan.

(5) Relationship between growth and provision of adequate public facilities.

This section of the WAC directs counties and cities to identify in their CFPs; which types of facilities are necessary for new development and if identified as necessary for new development - a nexus of appropriate impacts fees (if a part of the funding strategy), facilities to achieve urban densities, a concurrency provision for at least transportation impacts (but can include other needed facilities as a condition of project approval (e.g. sewer, water) and minimum levels of service standards.

Greater Efficiencies in Difficult Times

Planning for UGAs must begin with planning for urban services. In fact, planning for a 20-year urban growth area can best be served by first planning for 20 years of capital facilities. In doing so, service areas need to be ascertained, the quantity and quality of available infrastructure must be inventoried, an analysis performed to determine and prioritize what is needed for 20 years of infrastructure, and a sound financial plan for obtaining the funding necessary to underwrite urban services for an UGA must be completed. These are the primary components of a CFP. The CFP can then be translated into the geography of a potential UGA. At a minimum, capital facilities and UGA planning will also need a concurrent public participation program, an agreed upon 20-year population forecast to plan for, a land capacity analysis, and a SEPA analysis to ensure that a community preferred UGA will emerge to balance twenty years of potential growth with affordable urban services.

“Our city experienced a lot of growth for several years without matching funds for maintenance. We now have an aging infrastructure with limited resources. This is compounded by current economic factors, competition for funds with other general fund services, and citizen concerns with supporting tax increases.” John Ehrenreich, Councilmember, DuPont WA

A recent report by the Association of Washington Cities (AWC), notes the need for consistency between growth and infrastructure:

“City officials have long acknowledged an accumulation of necessary but under-funded infrastructure enhancements. AWC’s 2007 surveys on city infrastructure systems found that growth and rising bid prices created an environment where cities struggled to keep up with infrastructure needs, even when the economy was strong. In those relatively good budget years, street funds were not sufficient and aging water and sewer systems required sometimes unaffordable work to meet escalating regulatory requirements.” (Association of Washington Cities (AWC), 2011)

Washington cities and counties are not alone in meeting the challenges of providing urban services to their UGAs. The Urban Land Institute’s 2011 study on the nation’s infrastructure advised the following:

“Some states and local governments wisely are beginning to undertake realistic life-cycle budgeting for operating and maintaining systems, which can result in lower costs and greater efficiencies over time.

- *Focusing attention first on making necessary repairs and upgrades to existing systems;*
- *Developing a national infrastructure plan, then using a “Race to the Top” model for funding merit based projects at the state and local level that dovetail with the country’s overall economic priorities;*
- *Concentrating spending on the nation’s primary metropolitan areas, and in particular the global gateway markets where population and business activity are concentrated, and at the same time integrating*

infrastructure and land use planning to gain greater efficiencies;(emphasis added)

- *Providing greater long-term certainty for federal funding to support planning for capital projects;*
- *Instituting federal and state infrastructure banks to help support project financing, including public/private partnerships; and*
- *Phasing in user fees to help fund infrastructure initiatives on a continuing basis.” (Urban Land Institute and Earnst & Young, 2011)*

With fewer dollars from state and federal grant and loan programs, local government general fund shortfalls, gas and real estate taxes in decline, and sales tax revenue also declining, it is imperative that thoughtful land use planning for urban growth areas and reasonable population projections for the future, be combined with affordable capital facilities plans to manage anticipated growth in our Washington cities and counties.

The following chapters will examine recent studies showing costs of urban services and revenues generated from UGAs. They will also describe the relationship that density and design – particularly for infill and redevelopment - can have on making urban services more affordable, supporting transportation systems, lowering energy consumption and greenhouse gas emissions, and improving public health in UGAs.

Endnotes

¹ RCW 36.70A.110

² RCW 36.70B

³ RCW 36.70A.020(12)

⁴ RCW 36.70A.070(6)(b)

⁵ WAC 365-196-330 *Phasing Development Within the UGA*

⁶ RCW 36.70A.120

⁷ RCW 36.70A.030(18)

- [to table of contents](#)
- [next chapter](#)
- [endnotes](#)

Chapter 2

Cost of Urban Services in Urban Growth Areas

Collapse of the financial markets and bursting of the housing bubble in 2008 pulled Washington State, its cities, and counties into the Great Recession with the rest of the nation. Given these economic realities, a well-founded understanding of revenue sources combined with capital and long term operation and maintenance costs for providing urban services in Urban Growth Areas (UGAs), is clearly needed.

“Since the Great Recession began, a growing percentage of cities indicate they are worse off today than four years ago. In fall 2008, 47% of cities indicated they were less able to meet financial needs than in the recent past. That figure jumped to 77% in 2011. Cities’ response to the recession varies according to local needs, with cuts made at different times and in different ways. After adopting budgets for fiscal year 2011, cities report making cuts to infrastructure, parks, public safety, general government. The workforce is smaller and leaner. As city officials look to fiscal year 2012, many will continue to decrease spending in important areas like infrastructure and public safety.”⁸

30

Most cities and counties have little trouble determining their revenue, but few have a clear assessment of actual expenditures required to serve future growth in UGAs, as well as allocating some cost to replace aging infrastructure in UGAs - over the long term.

This chapter will examine: Growth Management Act (GMA) statutes and Washington Administrative Code (WAC) provisions that provide fiscal direction for providing urban services in UGAs; Growth Management Hearings Board cases relevant to fiscal analysis for urban services; an example of a city's Capital Facilities Element/Plan (CFP) that presents sources of revenues for urban services; a process for prioritizing and allocating funds to capital projects; concepts about Levels of Service (LOS) and related costs for providing urban services in UGAs; and an example of a county's Supplemental Environmental Impact Statement examining LOS and the cost of urban services for UGA alternatives.

GMA Statutes

Cities and counties in Washington State fund capital facilities from numerous resources, both within the jurisdiction and from outside funding sources such as state and federal loan and grant programs. The GMA requires that a comprehensive plan contain a CFP and that the CFP identify funding sources for each type of capital facility (RCW 36.70A.070(3))

*“A capital facilities plan element consisting of: (a) An inventory of existing capital facilities owned by public entities, showing the locations and capacities of the capital facilities; (b) a forecast of the future needs for such capital facilities; (c) the proposed locations and capacities of expanded or new capital facilities; (d) **at least a six-year plan that will finance such capital facilities within projected funding capacities and clearly identifies sources of public money for such purposes**; and (e) a requirement to reassess the land use element if probable funding falls short of meeting existing needs and to ensure that the land use element, capital facilities plan element, and financing plan within the capital facilities plan element are coordinated and consistent. Park and recreation facilities shall be included in the capital facilities plan element.”⁹*

The GMA also requires that county and city capital budget decisions implement and be made in conformity to its comprehensive plan.¹⁰

Countywide Planning Policies provide a framework for integrating consistency between county and city comprehensive plans. At a minimum, the policies need to implement: UGAs; contiguous and orderly development and provision of urban services; a process to site capital facilities of a countywide or statewide

nature; countywide transportation facilities and strategies; affordable house; joint planning among jurisdictions within UGAs, economic development and future development of commercial and industrial facilities; and **an analysis of the fiscal impact.**¹¹

Spokane County and cities describe fiscal impact analysis in their Countywide Planning Policies. The Policies call for fiscal impact analysis to assess: the costs of providing urban services for development; revenue sharing to finance capital facilities and maintain LOS; conducting fiscal impact analysis of local comprehensive plan elements such as CFP, urban growth areas, housing and orderly development.

Policy Topic 9 Fiscal Impacts: *The purpose of fiscal impact analysis is to assess the relative costs of providing urban governmental services to areas consistent with the plans developed by each jurisdiction. The Countywide Planning Policies establish overall direction for fiscal impact analysis as jurisdictions adopt their comprehensive plans. They call for revenue sharing and cooperation between jurisdictions to help finance shared needs and maintain levels of service. The policies require an examination of infrastructure costs and impacts caused by development, along with the capital resources available to accommodate growth. Finally, the policies provide specific guidance for conducting an analysis of comprehensive plan elements such as capital facilities, Urban Growth Areas (UGAs), housing and orderly development.*¹²

Helpful Guidance from the Washington Administrative Code

Commerce updated the Washington Administrative Code (WAC) for the GMA in 2010 with new sections added for guidance on providing urban services for UGAs and developing Capital Facilities Plans to support UGAs. The following section provides that a level of financial certainty is required when establishing or amending urban growth areas:

WAC 365-196-320(4) Level of financial certainty¹³

- (a) Any amendment to an urban growth area must be accompanied by an analysis of what capital facilities investments are necessary to ensure the provision of adequate public facilities.
- (b) If new or upgraded facilities are necessary, counties and cities must amend the capital facilities and transportation elements to maintain consistency with the land use element.

(c) The amended capital facilities and transportation elements must identify those new or expanded facilities and services necessary to support development in new urban growth areas. The elements must also include cost estimates to determine the amount of funding necessary to construct needed facilities.

(d) The capital facilities and transportation elements should identify what combination of new or existing funding will be necessary to develop the needed facilities. Funding goals should be based on what can be raised by using existing resources. Use of state and federal grants should be realistic based on past trends unless the capital facilities element identifies new programs or an increased amount of available funding from state or federal sources.

(e) If funding available from existing sources is not sufficient, counties and cities should use development phasing strategies to prevent the irreversible commitment of land to urban development before adequate funding is available. Development phasing strategies are described in WAC 365-196-330. Counties and cities should then implement measures needed to close the funding gap.

(f) When considering potential changes to the urban growth area, counties should require that any proposal to expand the urban growth area must include necessary information to demonstrate an ability to provide adequate public facilities to any potential new portions of the urban growth area.¹⁴

Clearly, both the statutes and the administrative rules require fiscal analysis to determine the costs of capital facilities and to show how capital facilities will be funded for urban growth areas. Growth Management Hearings Boards have also determined that jurisdictions need to show how they will finance capital facilities before setting urban growth boundaries. The process of designating an UGA within the Land Use Element and supporting capital facilities planning is iterative rather than sequential. The process must allow resource constrained capital facilities planning to provide a feasibility check on the strategy for accommodating growth outlined in the Land Use Element. The planning process must allow for feedback between the Land Use Element and the supporting elements showing that the adopted land use strategy is financially supportable with adequate facilities. This requires identification of levels of service in order to gauge adequacy, a general sense of the location and sizing of needed facilities, estimates of the total costs to construct and maintain such facilities, and an identification of revenue sources to fund the required facilities for at least the first six years of the plan. Although service area boundaries must be assumed in order to do capital facilities planning, these should not be adopted as final UGA boundaries until appropriate capital facilities planning to support them is complete.”¹⁵

Growth Management Hearings Board Cases

The following case summaries are reprinted from Hearings Board digests. These cases address the requirement to conduct a fiscal analysis in the CFP to show how urban services will be provided to support changes in land use plans. Full texts of cases may be obtained from the Hearings Board website at www.gmhba.wa.gov

The minimum six-year CFP is a living document. It is supposed to help cities and counties understand their current and future financial capabilities as they grow, how to pay for that growth and, in some respects, how to grow. They may find it is more cost-effective to increase density within their present UGA to absorb their population allocation, rather than run expensive utilities into expanding territory. An up-to-date CFE is a tool that can do this. McHugh, et al. v. Spokane County, et al., EWGMHB Case No. 05-1-0004, FDO, (Dec. 16, 2005).

A designated UGA without any updated or adequate inventory, estimate of current and future needs or adoption of methodologies to finance such needs for infrastructure does not comply with the GMA, nor did the county properly address urban facilities and services through an analysis of capital facilities planning. Durland v. San Juan County 00-2-0062c (FDO, 5-7-01)

Because non-municipal UGAs may allow an extension of urban growth to areas that do not already have a governmental structure for the provision of urban levels of service, it is important to have a plan for the provision of urban services to the entire non-municipal UGA. If this cannot be done, the boundaries of the non-municipal UGA are likely too large. Irondale Community Action Neighbors, et al. v. Jefferson County, WWGMHB Case No. 04-2-0022 (FDO, May 31, 2005) and Irondale Community Action Neighbors v. Jefferson County, WWGMHB Case No. 03-2-0010 (Compliance Order, 5-31-05)

Local Examples

Example 1: City of Vancouver 2011 Comprehensive plan and CFP Update

The City of Vancouver has both dedicated and unrestricted funding sources that can be allocated to capital facilities. The City, in its 2011 Comprehensive Plan and CFP update, lists the following capital facility funding sources: **impact fees, system development charges, real estate excise taxes (REET), federal and state grants, other agencies, restricted donations, general obligation bonds, water and sewer utility revenue bonds, voter approved bonds, arterial street fund, operating funds and general revenue sources.**

The City of Vancouver also has several other significant general revenue sources that can be allocated to capital facilities and that can be used for operation and maintenance for some capital projects. These sources include: **property tax, sales tax, business and occupation taxes, utility and gas taxes, license fees, and various revenue bonds.** Table D-2¹⁶ from the City of Vancouver's [2011 Comprehensive plan](#) – Public Facilities and Services Element and Appendix D, shows both the City's 6-year and 20-year capital facility funding sources.

To assess how the City will allocate funds to pay for urban services, Vancouver developed a funding process to identify and prioritize key capital projects and then match the cost of those projects with available revenues. The following is the City of Vancouver's capital funding process:

Capital facility funding process: In recognition of the scarcity of capital funding sources the City has developed a process to assess capital facility funding requirements and allocate capital funding to projects. That process includes department requests, a City Manager recommendation and City Council consideration. Key elements of the City's capital facility budgeting approach include:

Department submission of capital budget requests: Using a template provided by City budget staff, the staff in selected City departments submit their capital facilities budget requests. This request includes an update on the budget, actual expenditures, and projected revenues of current projects as well as information on new projects expected to start in the next biennium. Although a project may have costs in future years, if it is scheduled to begin in the upcoming biennium the full cost of the project is included in that biennium's budget appropriation.

Balanced Budgets by Project: Each project has to have specific funding sources identified that must be in balance with the proposed expenditures.

Reasonably Funded Test. Budget staff compare the funding required for the capital facilities budget requests in each department to the revenues that are currently available and reasonably expected to be received in the biennium. All of the recommended projects are funded by available capital reserves and projected revenues. Where future revenues are relied upon, department revenue estimates are reviewed and discounted by budget staff to determine the amount of funding available to support proposed projects.

Review with Senior City Management: The City Manager and his Senior Budget Review Team complete a review of the recommended capital budget. After their review the appropriate adjustments are made and discussed with department staff.

Council Appropriation: The recommended capital facilities budget is presented to City Council for approval. Approval is in the form of an ordinance authorizing the appropriation.

Budget Monitoring: Once the appropriations are approved by City Council, capital projects are monitored by department, budget and accounting staff. Project expenses are compared to their authorized appropriation using a project length schedule and the appropriate project budget is reflected in the City's financial system. Budget controls in the City's financial system restrict a project from overspending its approved budget. If an additional appropriation for a specific project is required, the department must demonstrate to budget staff where the funding will come from. Any need for additional appropriation at the fund level must be presented to City Council for approval.

The City of Vancouver and its citizens have adopted Levels of Service (LOS) for urban services and have aligned the City's revenue sources with its funding process, its future service needs, and costs for these services into a 6-year and 20-year CFP.

Vancouver's 2011 CFP shows needs, costs, and funding sources for each type of capital facility, focusing on the 6-year period through 2016. The City's and other agencies capital facilities costs through 2016 can be estimated to both a per capita cost and an area cost (sq mi) as shown in the Table 6. As a general rule of thumb, this type of cost breakdown can be helpful to approximate costs for potential UGA expansions or annexations. Cost estimates for the 20-year planning period are also derived from estimated project needs. Some expensive facilities (e.g. new fire stations) may be allocated into the first six years due to existing facility inadequacies rather than growth demands of the 20-year planning period.

Table 1-1 Summary of Vancouver CIP ¹⁷

Public Facility and Service	CFP Cost thru 2016	Estimated Population thru 2016	Service area: sq mi in 2011
Transportation	\$65,280,000	176,500	50
Water	\$36,662,000	241,000	69
Sewer	\$32,121,000	213,000	61
Stormwater	\$5,645,000	176,500	50
Parks	\$8,268,284	176,500	50
Fire	\$28,427,000	270,000	90
Police	\$250,000	176,500	50
Gen Govt	\$14,500,000	176,500	50
Schools	\$157,000,000	345,000	162
Transit	\$161,490,000	350,000	106

Source: [City of Vancouver, WA](#)

The City of Vancouver has a well-integrated comprehensive plan and CFP that provides City leaders the important infrastructure and fiscal data tools to make sound policy decisions about accommodating growth and providing that growth with urban infrastructure. The City's capital facility funding process involves the mayor, council, city manager, department staff, and the city budget staff to identify and prioritize important capital facilities needed to support the land use plan and then align the needed facilities with funding sources that balance with expenditures.

Example 2: Spokane County and Cities 2011 UGA Update

Spokane County and its cities are collaborating on a regional review and update of their UGAs through a Steering Committee comprised of elected officials from the county and cities. The technical studies to inform the Steering Committee are prepared by a Planning Technical Advisory Committee (PTAC), made up of planning staff from each jurisdiction. The PTAC prepares the technical studies for the Steering Committee to assist the elected officials to make informed decisions regarding UGAs. Studies completed thus far include: population forecasting and allocations to the jurisdictions for planning purposes; coordinated land quantity/capacity analysis; evaluation of regional levels of services and costs for urban services; and environmental analysis of impacts on the natural and built environment.

Four UGA alternatives have been developed and analyzed with SEPA into a Supplemental Environmental Impact Statement (SEIS) that describes and compares UGA growth impacts among the four alternatives. The Steering Committee adopted LOSs in the County-wide Planning Policies for regional services such as fire protection, emergency response, water, sewer, transportation, stormwater, solid waste, public transit, and street cleaning. In addition, jurisdictions also adopted in their respective comprehensive plans, LOS for parks, libraries, police, and jail services. The LOS in Table 7 combined with capital cost assumptions are used to compare the four UGA alternatives¹⁸.

Table 1-2 Level of Service or Assumption

Law Enforcement	officers per 1,000 people
Library	0.41 square feet per capita
Parks	1.4 acres per 1,000 people
Schools	0.5 students per residential unit
Res. Transportation	10 trips per day
Residential Wastewater	200 gal per day per residence
Com/Ind Wastewater	1,000 gal per day per acre
Residential Water Consumption	230 gal per day per residence
Com/Ind Water Consumption	1,000 gal per day per acre

Source: [Spokane County](#)

Four alternative UGA growth scenarios were created to calculate capacities within the current Metro UGA¹⁹ as well as to compare various impacts if adjacent areas are added to the current Metro UGA. The PTAC analyzed each alternative utilizing the adopted LOS along with capital costs and the potential environmental impacts to critical areas and water supply and demand.

Table 1-3 Fiscal and Capital Cost Assumption and Comparisons for Selected Urban Services

Urban Service	Assumed Cost	Alternative 1	Alternative 2	Alternative 3	Alternative 4
Law Enforc.	\$120,000/officer	\$14,280,000	\$14,640,000	\$15,840,000	\$14,880,000
Library	\$381/sq. ft.	\$18,402,000	\$18,858,000	\$20,349,201	\$19,128,000
Parks	\$300,000/acre	\$49,500,000	\$50,700,000	\$54,900,000	\$51,300,000
Schools	\$27,000/student	\$742,122,000	\$757,917,000	\$809,487,000	\$767,583,000

Source: [Spokane County](#)

Alternative Growth Scenario 1 is the current Metro UGA and population capacity, together with impacts and needs for the primary urban services. Alternative 1 has the capacity to serve the 20-year planning horizon for the Metro area. Alternatives 2 – 4 represent various scenarios that would add land to the existing UGA, along with impacts and needs for the same primary urban services. Utilizing the Assumed Cost for Urban Services (Table 7), the County and Cities are able to compare costs of the four UGA alternatives and align these costs with the community's ability to pay for urban services.

Table 1-4 Summary of Impacts Across Alternatives

LOS Element (Unit of Measure)	Alternative 1	Alternative 2	Alternative 3	Alternative 4
Population Capacity (People)	117,800	120,721	130,270	122,450
Law Enforcement (Officers)	119	122	132	171
Library Square (Feet)	48,298	49,496	53,410	50,204
Parks (acres)	165	169	183	171
Schools (Students)	27,486	2,8071	29,981	28,429
Residential Transportation (Daily Trips)	506,850	506,850	506,850	506,850
Wastewater (Gallons per Day)	10,995,000	11,865,000	12,134,000	12,725,000
Water Consumption (Gallons per Day)	12,644,000	129,13,000	13,1949,000	13,795,000

Source: [Spokane County](#)

Spokane County and Cities alternative urban growth scenarios were developed to understand the natural and built environment of the current UGA (Alternative 1) and also provide a comparison of impacts if Alternatives 2, 3, or 4 are added to the current UGA. The PTAC measured each urban growth scenario with adopted LOS and

fiscal analysis for capital costs, along with factors to determine potential impacts on critical areas, air quality, water quality, and water quantity. The complete analysis for Spokane County and Cities UGA Update can be accessed from the County website at: www.spokanecounty.org/bp

Who Pays for Urban Services

The City of Vancouver CFP shows a very detailed mix of revenue sources. Spokane County and Cities have similar revenue sources. Since revenue sources change from year to year, jurisdictions are faced with a complex challenge to align revenue sources with needed capital facilities and to assign costs equitably to both new development and to the larger community.

Many of the broad based taxes, such as property and sales taxes, are assessed to the entire community and everyone pays. However, when broad based revenues are used to pay for the cost of urban services for new development, questions of equity and benefits arise that need to be resolved in a public discussion of planning for UGAs.

“Fiscal impact analysis appears to be gaining recognition as an important tool for evaluating local land use and development policy decisions. A greater use of this analysis tool by local governments in Washington would shed light on how urban growth is impacting communities in the state. To achieve a real understanding of growth’s fiscal impacts, the substantial capital cost of the infrastructure growth requires, must be included in any analysis.”²⁰

The two examples in this chapter show what urban services each community is planning for and the level of services that each community has committed to achieve. Most importantly, the two methodologies help prioritize and determine the overall capital costs of providing services in their respective urban growth areas. Understanding the fiscal impacts of urban growth and applying the cost of urban services to existing or new urban growth areas is essential in order to have fiscal balance in our cities and counties.

“Integrating finance with land use planning requires some caution. I’ve heard it said that there are two significant pitfalls to incorporating finance into the GMA planning process. The first pitfall is to involve the finance director in the planning process since the pessimism and cautiousness of the typical finance director will tend to dampen and constrain the “dreaming” about the future essential to a good visioning process. The second pitfall is to not involve the

finance director because the plan may then become fiscally unrealistic and difficult to implement. When considering the role of financial planning in comprehensive planning, one always needs to remember that it is a question of how to balance “thinking creatively” about the future while simultaneously being concerned about how to pay for that future.”²¹

The risk in not analyzing the costs of urban services and aligning these costs to a compatible land use plan is a deepening budget hole – where new growth will always be needed to pay the debt service on old growth. This is not a sustainable pattern of development that will generate the funding to provide for new urban services, let alone pay the long term obligation for replacing large urban infrastructure systems once their current life cycle ends.

In the next chapter, we will examine how tools such as density, design, transportation, infill and redevelopment, innovative zoning, and land use policy can economize the cost of urban services in urban growth areas.

Endnotes

⁸ Association of Washington Cities, November 2011, “Cities Tackle the New Normal Head On”

⁹ RCW 36.70A.070(3)

¹⁰ RCW 36.70A.120

¹¹ RCW 36.70A.210(3)

¹² Countywide Planning Policies for Spokane County

¹³ <http://apps.leg.wa.gov/WAC/default.aspx?cite=365-196-320>

¹⁴ <http://apps.leg.wa.gov/WAC/default.aspx?cite=365-196-320>

¹⁵ Alan Copsey and David Andersen, State of Washington, *Summary of Recent Cases Before Washington's Growth Management Hearings Boards July 1, 2003 – December 31, 2003*

¹⁶ City of Vancouver Comprehensive Plan, Capital Facilities Plan, *Appendix D Capital Facilities Funding Summary*

¹⁷ From [City of Vancouver Comprehensive Plan](#) Table 5-2 page 5-5

¹⁸ Spokane County Urban Growth Area Update, October 2011, “Assessment of Growth and Development”

¹⁹ Metro UGA: Cities of: Spokane, Spokane Valley, Millwood, Liberty Lake, and Airway Heights. Spokane County unincorporated urban areas.

²⁰ Eben Fodor, “*The Cost of Growth in Washington State*”

²¹ Pat Dugan, 2007, “*The Capital Facilities Balancing Act*”

Chapter 3

Tools to Manage Urban Growth Areas

The Growth Management Act (GMA) was enacted to provide local communities the framework and tools for managing growth. One of the fundamental principles of the GMA is that Urban Growth Areas (UGAs) should be developed to provide compact urban communities with adequate urban services, and be done in such a manner to ensure the financial obligations that come with growth, can be met.

The legislature finds that uncoordinated and unplanned growth, together with a lack of common goals expressing the public's interest in the conservation and the wise use of our lands, pose a threat to the environment, sustainable economic development, and the health, safety, and high quality of life enjoyed by residents of this state²²

A major consequence of uncoordinated and unplanned growth is sprawl. Numerous studies have shown sprawl to be the most expensive form of development to provide with urban services. The GMA and local comprehensive plan goals and policies, together with implementing development regulations, enable citizens to make choices that can create healthy communities.

“Creating more compact, people-oriented living and working places is meant to protect environmentally sensitive areas, and preserve forests, farmlands, and open spaces, while

*creating complete communities and **reducing sprawl**. Focusing development creates certainty as to where growth and investments are to occur, providing security for public and private investments.”²³*

This chapter will examine: tools provided in the GMA statutes and Washington Administrative Code (WAC) for managing urban growth; Growth Management Hearings Board and court cases relevant to managing growth and economizing urban services within UGAs; examples of jurisdictions that utilize density, infill, historic preservation, redevelopment and increased density, transportation and energy strategies, mixed use zoning and nodal development; and other land use policy planning techniques to manage growth in a fiscally responsive manner.

GMA Statutes

Several planning goals of RCW 36.70A.020 provide the statutory framework for implementing innovative tools provided both in the statutes and rules for communities to create balanced urban development.

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

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

Housing. 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.

Public facilities and services. Ensure that those public facilities and services necessary to support development shall be adequate to serve the development at the time the development is available for occupancy and use without decreasing current service levels below locally established minimum standards.

Historic preservation. Identify and encourage the preservation of lands, sites, and structures that have historical or archaeological significance.

In addition to the above planning goals related to UGAs, the GMA also provides important definitions for urban services and urban growth (RCW 36.70A.030):

"Urban governmental services" or "urban services" include those public services and public facilities at an intensity historically and typically provided in cities, specifically including storm and sanitary sewer systems, domestic water systems, street cleaning services, fire and police protection services, public transit services, and other public utilities associated with urban areas and normally not associated with rural areas.

"Urban growth" refers to growth that makes intensive use of land for the location of buildings, structures, and impermeable surfaces to such a degree as to be incompatible with the primary use of land for the production of food, other agricultural products, or fiber, or the extraction of mineral resources, rural uses, rural development, and natural resource lands designated pursuant to RCW 36.70A.170. A pattern of more intensive rural development, as provided in RCW 36.70A.070(5)(d), is not urban growth. When allowed to spread over wide areas, urban growth typically requires urban governmental services. "Characterized by urban growth" refers to land having urban growth located on it, or to land located in relationship to an area with urban growth on it as to be appropriate for urban growth.

"Urban growth areas" means those areas designated by a county pursuant to RCW 36.70A.110.

RCW 36.70A.070(1) enables cities and counties to include in the Land Use Element of their comprehensive plans population densities, building intensities, and estimates of future growth as well as to utilize urban planning approaches that promote physical activity. The statute also enables the use of a variety of housing types to manage growth in UGAs and allows transportation demand management strategies for pedestrian and bicycle facilities and corridors to encourage community access and promote healthy lifestyles in UGAs. These types of innovative goal and policy techniques in comprehensive plans are further supported with RCW 36.70A.090, to include density bonuses, cluster housing, planned unit developments and the transfer of development rights.

RCW 36.70A.110, 36.70A.115, and 36.70A.160 enable jurisdictions to: designate UGAs and to provide sufficient land within UGAs for the 20-year planning horizon. These statutes also direct jurisdictions to provide for: urban services; urban growth with a variety of densities, greenbelts or open space areas; a broad range of needs, and uses that will accompany the projected urban growth. Typical uses would include as appropriate: medical, governmental, institutional, commercial, service, retail, and other non-residential uses. The GMA provides the following guidance for locating urban growth:

Urban growth should be located first in areas already characterized by urban growth that have adequate existing public facility and service capacities to serve such development, second in areas already characterized by urban growth that will be served adequately by a combination of both existing public facilities and services and any additional needed public facilities and services that are provided by either public or private sources, and third in the remaining portions of the urban growth areas. Urban growth may also be located in designated new fully contained communities as defined by RCW 36.70A.350.²⁴

Counties, working with their cities²⁵, have the responsibility to allocate the majority of growth to UGAs, with the balance left to the unincorporated non-UGA portions of the county, in concert with maintaining rural character, protection of critical areas, and conservation of resource lands.

Helpful Guidance from the Washington Administrative Code

Commerce updated the WAC for the GMA in 2010 with new sections added on urban density and phasing development in UGAs. The following sections describe how density and phasing can be used as tools to manage and pay for growth within urban growth areas.

WAC 365-196-300 Urban density²⁶

This section of the WAC provides guidance for directing new growth to UGAs to allow efficient provision of urban services as well as the ability to transition governance between counties and cities. This ability to direct growth to UGAs also reduces pressure on rural and resource lands. Urban density requirements in the GMA need to consider allowed density, assumed density, and achieved density. Jurisdictions have the ability to create a range of densities within UGAs to accommodate their 20-year population allocations by considering factors that include: higher density to economize the cost of providing urban services; higher density in transit corridors; densities that can accommodate 20 years of growth; higher densities in centers, densities that support a variety of housing types, and appropriate densities near critical areas. The land use designations in comprehensive plans set the goals and policies for assumed densities. Development regulations then implement the plan's assumed densities.

WAC 365-196-330 Phasing development within the UGA²⁷

This section of the WAC provides guidance for sequencing development within UGAs over the 20-year planning period in order to match development to the provision of urban services, supported by a sound financial plan. Phasing can prevent a pattern of low density sprawling development that is difficult and costly to provide urban services. Phasing also facilitates coordinated agreements between service providers and the transition of services and/or governance. Comprehensive plans and development regulations should identify areas where phasing will occur and the criteria for planned densities and timelines of services based on the availability of services.

Growth Management Hearings Board Cases

The following case summaries are reprinted from Growth Management Hearings Board digests. These cases address how jurisdictions use density in urban growth areas to manage growth. Full texts of cases may be obtained from the Hearings Board website at www.gmhb.wa.gov

For sizing UGAs, the density assumption used cannot be based upon historic patterns that perpetuated low density sprawl, and must reflect the planned for urban densities. [Bremerton/Port Gamble, 95-3-0039/97-3-0024c, 9/8/97 Order, at 16.]

The Board has interpreted various means of calculating density for various purposes, and acknowledged certain “deductions” from gross area as an appropriate means of determining buildable area and determining the net density yield in units per acre. However, which factors are deducted in the calculations is a policy choice for local governments to make, so long as they are supported by evidence in the record and consistent with the goals and requirements of the Act. [Fuhriman II, 05-3-0025c, FDO, at 26.]

UGA must allow for eventual urban densities, typically by platting and locating initial growth so that higher densities will be available as urban services are available. Skagit County Growthwatch v. Skagit County, Case No. 07-2-0002, FDO at 62-63 (Aug. 6, 2007)

RCW 36.70A.110(2) and .130(3) contain two compatible and major directives. The first is that the State Office of Financial Management (OFM) must project population ranges for each GMA county. These are the population drivers, the urban growth, which the county, in conjunction with its cities must accommodate. Second, this section of the Act directs the county and its cities to include areas and densities sufficient to permit the urban growth that is projected to occur. In order to comply with these directives, jurisdictions must undertake some form of land capacity analysis to determine whether their areas and permitted densities for the lands within their jurisdiction can accommodate the projected and allocated growth. Both of these GMA requirements speak in terms of providing densities to accommodate growth – compact urban development. [Strahm, 05-3-0042, FDO, at 12.]

Where a UGA is developed at non-urban densities and intensities due to a lack of adequate urban services, then it is unlikely to ever become urban in nature. Counties and cities need to ensure that new development which is not yet served by urban services does not become permanent sprawl or environmentally damaging if capital facilities planning assumptions do not come to fruition or if growth does not occur when and how it was expected. *ADR/Diehl v. Mason County*, Case No. 06-2-0006.

Urban levels of service to non-urban development encourages rather than discourages such suburban sprawl. Designating an area a UGA but allowing non-urban densities of residential development fails to meet the urban density requirements for UGAs. Without some mechanism to assume minimum urban densities, the new residential portions of the UGA are all too likely to become suburban sprawl. *Skagit County Growthwatch v. Skagit County*, Case NO. 07-2-0002, FDO at 41(Aug. 6, 2007).

Development Regulation Tools

Development regulations implement the comprehensive plan goals and policies²⁸ by prescribing the standards that will shape the urban environment. These development standards are written in local zoning codes, subdivision ordinances, planned unit development ordinances, critical area ordinances, and other official controls. Development regulations can achieve: appropriate uses and mix of uses; minimum and maximum

densities; design standards; mechanisms to transfer development rights; phasing or timing of infrastructure availability to growth; infill and redevelopment investment; and other innovative development strategies.

“Zoning is merely a tool. It is a means to an end. It can be used constructively as a positive force for community good or it can be misused. Zoning is what you make of it. It works best when it is based on a community vision and closely tied to a comprehensive plan. At its best, zoning can provide the marketplace with predictability and certainty. It can protect critical natural resources and it can raise property values. However, by itself, conventional zoning will rarely create a memorable community. This is because conventional zoning is a limited tool. It is good for protecting what is already there and for preventing nuisances. It is not as good for shaping the future or for improving the quality of new development. This is because most zoning codes are proscriptive in nature. They try to prevent bad things from happening without laying out a vision of how things should be. Successful communities think beyond conventional zoning. They use education, incentives and voluntary initiatives, not just regulation. They also use design standards, form-based codes, density bonuses, transfer of development rights and other innovative techniques that foster walkable, mixed use neighborhoods.”²⁹

The GMA encourages flexible tools be included in zoning codes and development regulations to facilitate more compact urban development with a variety of densities and affordable housing types versus reliance on minimum lot sizes as the primary means of establishing residential density. Some of these tools include:

- Increasing base densities; to allow more homes per acre and reduce urban services costs, as well as reducing sprawl development patterns. Some jurisdictions accomplish this by requiring minimum densities in some or all zoning districts, especially in transit-oriented development districts where surrounding densities are planned to support costs of providing public transportation services.
- Bonus densities offered in exchange for: higher quality design; affordable housing; open space; or other public benefits.
- Clustering to allow greater efficiencies in using land for the same number of potential lots in a smaller area and creating open space for recreation, or because of critical areas. In some cases, clustering is used to reserve the remaining area for future urban development when urban services become available.

- Lot size averaging to provide a range of lot sizes, as long as the average lot size remains consistent with the underlying zoning designation.
- Planned Unit Developments (PUDs) or Planned Residential Developments (PRDs) to allow for flexible lot sizes in exchange for other standards or for developing sites that are difficult to work with.
- Narrow streets to increase the potential density and reduce the amount of land needed for each housing unit. Narrow street designs also slow traffic, encourage walking, and contribute to community character.

Numerous cities and counties fully planning under the GMA have implemented flexible development regulation tools that achieve densities to maximize use of available urban land and economize the costs for providing urban services. In addition, these densities support various modes of transportation systems and other public

Development Regulation Tools	Jurisdiction
Variety of base zoning density	City of Spokane ³⁰
Clustering in urban reserve areas	Spokane County ³¹
Lot size average	Snohomish County UDC 30.23.210 ³²
Minimum and maximum densities	City of Renton ³³
Planned Residential Developments	City of Edmonds ³⁴
Bonus densities	City of Sumner ³⁵
Transfer of Development Rights (TDRs)	City of Redmond ³⁶

services that are cost prohibitive with low density development. The following table provides examples of flexible development regulations from each jurisdiction's website:

Transfer of Development Rights

Commerce's Growth Management Services Program provides guidance on Transfer of Development Rights (TDR), with assistance focused on cities and counties in the Puget Sound Region. The Commerce TDR program model is also available to all other Washington cities and counties through the Commerce TDR website³⁷

The TDR program is a market-based land use tool that cities and counties can utilize to manage and encourage growth within their communities while at the same time, conserve natural resource and open space lands. Communities identify areas that they want to conserve, such as archaeological and historic properties, agricultural land, forest land, open space, or other resource or rural lands. These resource or open space lands are identified as "sending areas."

Through voluntary market based transactions, landowners in the sending areas can sell their development rights to developers for use in urban areas. Resource or open space landowners would receive money from the sale of their development rights, yet continue to own and use their land.

Developers who purchase development rights from land owners in the sending areas can transfer these rights to "receiving areas" in UGAs. The TDR could then allow developers to obtain locally predetermined benefits, such as the ability to build additional housing units or increase commercial space, above what the underlying zoning permits. Planning for more compact development in receiving areas should result in walkable communities with access to transit, less dependence on automobiles, a variety of shops and services, and amenities such as open space, trails, and street trees.

Some TDR programs provide development rights that can be converted to additional building height or expanded floor space, or reduced parking or stormwater requirements. Good planning for receiving areas would also include planning for the infrastructure capacity and services to meet the needs of increased growth and compact development as well as work to identify and protect archaeological sites and historic properties in order to avoid inadvertently being the receiving site of development rights that might alter or destroy these resources.

Local Examples

The following communities are using flexible development regulations with innovative tools to stimulate infill and redevelopment where appropriate and at the same time, promoting preservation of their historic urban fabric in urban areas. These tools foster balanced development that is both economically viable, architecturally engaging, environmentally sensitive, and integrates transportation approaches to promote physical activity.

Figure 2-1 Kendall Yards - Spokane



Source: City of Spokane

Example 1: City of Spokane

Flexible development regulations together with infrastructure financing plans and local community support can result in a project like Kendall Yards PUD³⁸, in the City of Spokane. Located on the scenic North Bank of the Spokane River Gorge and just 2 blocks from the Central Business District, the site is where both infill and revitalization in the West Central neighborhood is now happening because of connectivity to the redevelopment of a 78 acre adjacent Brownfield site that long ago consisted of abandoned warehouses, railway yards, and contaminated soils.

The Kendall Yards redevelopment is an award-winning community development project that offers a variety of housing types (18 units/acre and approximately 900 housing units) with single family – townhouses – and multi-unit condos, mixed use office and retail, along with the construction of a new and important extension of Spokane's Centennial Trail to further facilitate walking and bicycling as healthy – energy saving amenities for the City of Spokane. This is one of Spokane's largest redevelopment projects in several years, exercising many

of the City's comprehensive plan goals and policies together with implementing the City's flexible development regulations and design review process.

Example 2: City of Bellevue

The City of Bellevue's Bel-Red Corridor Subarea Plan was given the Vision 2040 Award from the Puget Sound Regional Council (PSRC). Bellevue's subarea plan will transform the City's Bel-Red area into a vibrant corridor that links transportation, jobs, housing and recreation.

*"The Bel-Red plan, included changes to zoning and development regulations, calls for the transformation of a 900-acre light industrial and retail area into mixed-use, transit-oriented neighborhoods. Plans also include the creation of thousands of new jobs and housing units, along with stream restorations and new parks. Located between downtown Bellevue and Microsoft's headquarters in Redmond, the Bel-Red area is envisioned as a model for sustainable planning, utilizing large-scale, transit-oriented development that will be served by the future East Link light rail line."*³⁹

Bellevue's Bel-Red Corridor Subarea Plan has been a work in progress for several years, including a citizens committee that worked for 20 months to develop the plan, along with an investment of more than \$1 million. The Bel-Red plan can be accessed at the City of Bellevue's website.⁴⁰

Example 3: City of Bellingham/Port of Bellingham

The City of Bellingham, the Port of Bellingham, and citizens have been collaborating on creation of a Master Plan⁴¹ to guide the redevelopment of Bellingham's downtown Waterfront District. The community's long range vision is to create a new mixed used neighborhood that features residential, commercial, light industrial and institutional uses, together with parks and trails, and a healthy shoreline habitat.

*"The proposed Master Plan for the city center waterfront provides a framework for the development of a vibrant, mixed-use neighborhood. The proposed plan includes a balance of environmental, economic, and community objectives developed to restore the health of the land and water, improve waterfront access, promote a healthy and dynamic waterfront economy, and reinforce the inherent qualities of the waterfront."*⁴²

- [To table of contents](#)
- [previous Chapter](#)
- [next chapter](#)
- [endnotes](#)

The City of Bellingham’s vision, goals, and policies for its Waterfront Plan are implemented through the City’s flexible development regulations. The City’s Comprehensive plan, Land Use Code, and subarea plans can be accessed at the City of Bellingham’s Community Planning website.⁴³

Other Examples: Subarea planning tools

The following table lists other subarea planning tools in addition to the examples above, that are currently in the process of being implemented, under construction, or have recently been completed.

Other Examples Subarea Planning Tools

Jurisdiction	Subarea Plan
Bremerton	South Kitsap Industrial Area ⁴⁴
Vancouver	Waterfront, Esther Short Plan ⁴⁵
Burien	Downtown Burien ⁴⁶
Mill Creek	Town Center ⁴⁷
Everett	Evergreen Way Revitalization Plan ⁴⁸
Tukwila	Manufacturing Industrial Center ⁴⁹
Renton	Southport ⁵⁰
Seattle	South Lake Union ⁵¹
Mountlake Terrace	Town Center ⁵²
Federal Way	City Center Redevelopment ⁵³
Bellingham	Historic Preservation ⁵⁴
Ellensburg	Historic Preservation Comp Plan Ch 10 ⁵⁵

These examples represent utilization of the GMA's statutory framework for managing growth in UGAs with a variety of planning tools. The GMA, and guidelines provided in the WAC, support Washington cities and counties with planning tools to create healthy urban communities with adequate and affordable urban services.

“It is widely acknowledged that one of the major barriers to smart growth is local regulation. Our codes and practices either discourage developers from carrying out the smart growth

vision, or they actually prohibit it. Mixed-use, mixed-income neighborhoods are seldom allowed. Pedestrians and bicyclists are overlooked in an environment where the priority is granted to motorized vehicle flow. In many places, the benefits of public spaces and appealing streetscapes have been forgotten.”⁵⁶

In the next chapter we will examine: estimating future population growth; OFM’s role in providing GMA population projections that local governments use for planning; GMA Statutes and Rules for population planning, Growth Management Hearings Board and court cases related to population planning; policy considerations in choosing a specific population projection; and examples of county-city planning processes for allocating population projections to communities for planning purposes.

Endnotes

²² RCW 36.70A.010, Legislative findings

²³ Ivan Miller and Ben Bakkenta, PSRC, “Focusing growth in centers: The Vision”

²⁴ RCW 36.70A.110(3)

²⁵ RCW 36.70A.110(2)

²⁶ <http://apps.leg.wa.gov/WAC/default.aspx?cite=365-196-300>

²⁷ <http://apps.leg.wa.gov/WAC/default.aspx?cite=365-196-330>

²⁸ RCW 36.70A.040

²⁹ Edward T. McMahon, Urban Land Institute 2011, “Zoning at 85”

³⁰ <http://www.spokanecity.org/services/documents/smc/?Chapter=17C.110>

-
- ³¹ <http://www.spokanecounty.org/loaddoc.aspx?docid=4419>
- ³² http://www1.co.snohomish.wa.us/County_Services/County_Code/County_Code_Collection.htm
- ³³ <http://www.codepublishing.com/wa/renton/> Title IV Development Regulations, Density Tables
- ³⁴ http://www.mrsc.org/wa/edmonds/index_dtsearch.html Title 20 Review Criteria and Procedures, Chapter 20.35
- ³⁵ <http://www.codepublishing.com/wa/sumner/> Title 18 Zoning, Chapter 18.24
- ³⁶ <http://www.ci.redmond.wa.us/PlansProjects/ComprehensivePlanning/TransferOfDevelopmentRights/>
- ³⁷ <http://www.commerce.wa.gov/Services/localgovernment/GrowthManagement/Regional-TDR-Rights-Program/Pages/default.aspx>
- ³⁸ <http://www.spokaneplanning.org/default.htm> Kendall Yards
- ³⁹ <http://www.ci.bellevue.wa.us/bel-red-vision-award.htm>
- ⁴⁰ http://www.bellevuewa.gov/bel-red_intro.htm
- ⁴¹ <http://www.cob.org/services/neighborhoods/community-planning/waterfront/index.aspx>
- ⁴² <http://www.portofbellingham.com/index.aspx?nid=172>
- ⁴³ <http://www.cob.org/services/neighborhoods/community-planning/index.aspx>
- ⁴⁴ <http://www.ci.bremerton.wa.us/display.php?id=1118>
- ⁴⁵ <http://www.cityofvancouver.us/VCCV.asp?menuid=10464&submenuID=17517&itemID=28269>

⁴⁶ <http://burienwa.gov/index.aspx?NID=72>

⁴⁷ <http://www.cityofmillcreek.com/DEPARTMENT%20PAGES/COMMUNITY%20DEVELOPMENT%20MAIN%20PAGE.html> Town Center

⁴⁸ <http://www.everettwa.org/default.aspx?ID=1638>

⁴⁹ <http://www.ci.tukwila.wa.us/dcd/micstudy.html>

⁵⁰ <http://rentonwa.gov/business/default.aspx?id=2814>

⁵¹ http://www.seattle.gov/dpd/Planning/South_Lake_Union/Overview/default.asp

⁵² <http://www.cityofmlt.com/cityServices/planning/townCenter/townCenter.htm>

⁵³ <http://www.cityoffederalway.com/index.aspx?NID=503>

⁵⁴ <http://www.cob.org/services/neighborhoods/historic-preservation/index.aspx>

⁵⁵ <http://www.ci.ellensburg.wa.us/index.aspx?nid=108>

⁵⁶ Overcoming Obstacles to Smart Growth through Code Reform, *Executive Summary: Smart Growth Zoning Codes*, Steve Tracy

Chapter 4

Population Projections for Urban Growth Areas

Urban Growth Areas (UGAs) are comprised of lands designated by a county, in collaboration with its cities and towns, citizens and service providers, as to where urban development will occur. The collaboration process is required by the Growth Management Act (GMA) in order to select a 20-year countywide population projection from a range of population projections provided by the state Office of Financial Management (OFM). The selected OFM countywide population projection, together with a locally determined countywide employment projection, is allocated among UGAs. UGAs must be sized with sufficient land to accommodate the allocation.

“For many cities, recent population growth contributes to current fiscal challenges. Growth carries positive and negative fiscal implications. On the positive side, it provides a city with one-time revenues such as the real estate excise tax and sales tax on new construction. It expands the tax base creating greater sales tax or property tax potential (although the one percent cap on property tax revenues creates challenges). On the negative side, growth results in increased service demands. While these service demands are ongoing, many of the revenues associated with growth are not.”⁵⁷

Selecting a population projection from within the OFM range and determining a local employment projection from it, based on data available from sources like the [Washington State Employment Security](#)

[Department](#), can influence the future development that occurs. A realistic population projection to plan for twenty years of potential growth can ensure adequate amounts of land and services are planned for UGAs. Planning with an inflated population number can result in oversized UGAs that facilitate more growth than local governments can afford to provide with necessary urban services.

Other partners that counties and cities should include in their UGA collaboration process are federally recognized Tribes, Port Districts and Special Purpose Districts.

Federally recognized Tribes are sovereign nations and often contain “trust” lands that are authorized by the federal government, held in trust by the Department of the Interior, supported by the Bureau of Indian Affairs (BIA), and under Tribal land use regulation. Tribes may also own “fee simple” lands. Tribal Trust and fee simple lands may contain urban development and urban infrastructure. These lands can represent a portion of the overall county population and employment projections and should be factored into regional planning efforts. Use of Tribal owned trust and fee simple land within Tribal boundaries is governed by Tribes, subject to certain federal agreements. Tribal trust and fee simple land within Tribal boundaries is generally not subject to state planning laws⁵⁸ such as the GMA. Tribal fee simple lands outside of Tribal boundaries and Non-Indian fee land within Tribal boundaries may be subject to local planning requirements if not pre-empted by a formal Tribal-federal interest (e.g. natural resources interest). Counties and cities may enter into Memoranda of Understanding (MOU), interlocal agreements, and/or contractual agreements with Tribes to integrate their respective planning efforts. Agreements can include, for example, application of: general planning concepts, comprehensive plans, development regulations, building permits, provision of infrastructure, environmental protections, and resource land conservation. Counties and cities will, however, need to maintain their compliance with the GMA.

Port Districts and Special Purpose Districts are authorized by statute and may contain urban development and infrastructure that is guided by District master plans. Port Districts and Special Purpose Districts are subject to state laws and indirectly subject to the GMA by their inclusion or adoption by reference into the comprehensive plans, development regulations, and Capital Facilities Plans of counties and cities planning under the GMA. Portions of Port or Special Purpose Districts may also contain or be designated as Essential Public Facilities pursuant to RCW 36.70A.200.

Tribes, Port Districts, and Special Purpose Districts can have significant development impacts as well as make important contributions to a county’s regional land use, population, and infrastructure planning process. Counties and cities should include Tribes, Port Districts, and Special Purpose Districts in their collaboration

process when reviewing and updating UGAs, paying particular attention to RCW 36.70A.210 for county-wide planning policies, RCW 36.70A.035 for public participation, RCW 36.70A.110 for urban growth areas, and in consideration of the timelines established in RCW 36.70A.130 for review and update of comprehensive plans, UGAs, and development regulations.

Population projections for GMA review and update of comprehensive plans, UGAs, and development regulations⁵⁹ is authorized by RCW 43.62.035, in part as follows:

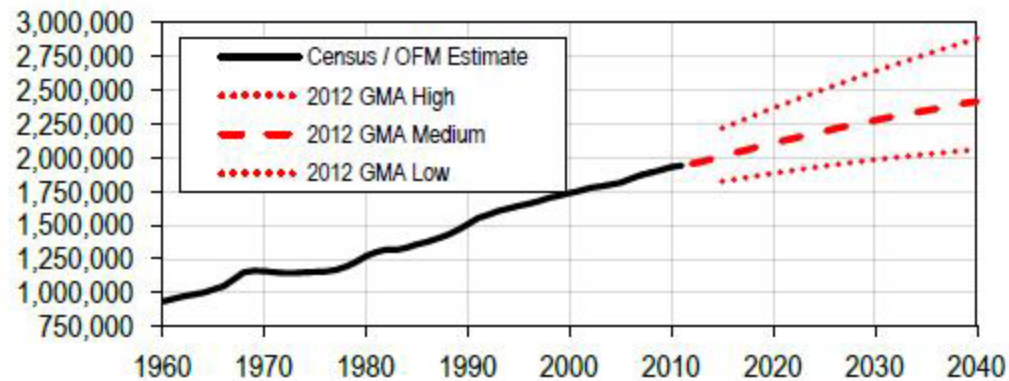
At least once every five years or upon the availability of decennial census data, whichever is later, the office of financial management shall prepare twenty-year growth management planning population projections required by RCW 36.70A.110 for each county that adopts a comprehensive plan under RCW 36.70A.040 and shall review these projections with such counties and the cities in those counties before final adoption.

As directed by RCW 43.62.035, OFM prepares a reasonable range of high, medium, and low population growth projections for Washington counties, with the medium projection being the estimate for what is most likely to occur. These population projections

are for the next 20 years and are used to predict, plan for, and manage growth.

Developing population projections is a shared responsibility between OFM and local governments. Local counties and cities can provide OFM with information to develop the countywide projections, and can petition OFM to revise projections after they are issued. Once established, county officials in consultation with cities are responsible for selecting a 20-year GMA planning target from within the OFM range and allocating it to local UGAs.

Figure 4-1 OFM Population Forecast for King County



Source: [Office of Financial Management](#)

- [to table of contents](#)
- [previous chapter](#)
- [next chapter](#)
- [endnotes](#)

Counties should try to reach agreement with cities on sizing UGAs and must justify their decisions in writing in the event of disagreement. The density and amount of land needed to accommodate growth allocations in UGAs is determined by goals and policies, standards, and through a local Land Capacity Analysis (see Chapter 5 of the UGA Guidebook).

Table 4-1 OFM 2012 Population Projection for King County

Year	Population (Low)	Population (Medium)	Population (High)
2010 (Census)		1,931,249	
2015	1,824,289	2,012,782	2,219,135
2020	1,885,169	2,108,814	2,368,179
2025	1,938,096	2,196,202	2,507,888
2030	1,985,107	2,277,160	2,640,653
2035	2,025,180	2,350,576	2,765,272
2040	2,060,522	2,418,850	2,884,338

Source: [Office of Financial Management](#)

Counties work with their cities to select reasonable population allocations to use for planning purposes. Benton County, for example, updated its population projections in 2009 for the succeeding 20-year planning period using the OFM high projection. The table below shows how countywide population is allocated to the unincorporated area, and to the cities of Benton City, Kennewick, Prosser, Richland, and West Richland:

Table 4-2 OFM 2009-2029 Benton County Population Allocations

OFM High Series Countywide								
Projection	Benton Co	Benton City	Kennewick	Prosser	Richland	West Richland	Total	Year
188,931	43,453	3,779	71,794	5,668	52,901	11,336	188,931	2010
203,736	46,859	4,075	77,420	6,112	57,046	1,224	203,736	2,015
218,874	50,341	4,377	83,172	6,566	61,285	13,133	218,874	2020
234,015	53,824	4,680	88,926	7,020	65,524	14,041	234,015	2025
239,752	55,143	4,795	91,106	7,193	67,130	14,385	239,752	2027
245,489	56,462	4,910	93,286	7,365	68,737	14,729	245,489	2029

Source: [Benton County](#)

This chapter of the guidebook will examine tools provided in statutes and Washington Administrative Code (WAC) for determining population projections, along with Growth Management Hearings Board and court cases relevant to population planning within UGAs. It also provides examples of two counties that utilize a coordinated process with their cities to determine population and employment projections to plan for, together with policy planning techniques to manage the potential future growth in UGAs.

GMA Statutes

The GMA requires fully planning jurisdictions to include in their comprehensive plans a characterization of population within their community, together with estimates of potential future population.

“The land use element shall include population densities, building intensities, and estimates of future population growth.”⁶⁰

Comprehensive plans and development regulations must provide sufficient land capacity for development to accommodate allocated housing and employment growth consistent with the 20-year OFM population projection.⁶¹ Furthermore, the housing element of comprehensive plans should identify the types of housing units needed for the population projection.⁶²

RCW 36.70A.110(2) enables jurisdictions to direct a large percentage of the future population projection to UGAs. A portion of the population projection can also be allocated to rural areas, and Fully Contained Communities consistent with RCW 36.70A.350(1).

“Based upon the growth management population projection made for the county by the office of financial management, the county and each city within the county shall include areas and densities sufficient to permit the urban growth that is projected to occur in the county or city for the succeeding twenty-year period, except for those urban growth areas contained totally within a national historical reserve. As part of this planning process, each city within the county must include areas sufficient to accommodate the broad range of needs and uses that will accompany the projected urban growth including, as appropriate, medical, governmental, institutional, commercial, service, retail, and other nonresidential uses.”⁶³

“New fully contained communities may be approved outside established urban growth areas only if a county reserves a portion of the twenty-year population projection and offsets the urban growth area accordingly for allocation to new fully contained communities that meet the requirements of this chapter. Any county electing to establish a new community reserve shall do so no more often than once every five years as a part of the designation or review of urban growth areas required by this chapter. The new community reserve shall be allocated on a project-by-project basis, only after specific project approval procedures have been adopted pursuant to this chapter as a development regulation. When a new community reserve is established, urban growth areas designated pursuant to this chapter shall accommodate the unreserved portion of the twenty-year population projection.”⁶⁴

Helpful Guidance from the Washington Administrative Code

Commerce updated the Washington Administrative Code (WAC) for the GMA in 2010 with new sections added on population projections for UGAs. The following guidelines describe how population projections can be used to manage and pay for growth within urban growth areas:

“The areas and densities within an urban growth area must be sufficient to accommodate the portion of the twenty-year population that is allocated to the urban area. Urban densities should allow accommodation of the population allocated within the area that can be provided with adequate public facilities during the planning period.”⁶⁵

WAC 365-196-310(3) Urban growth areas⁶⁶

This section of the WAC includes guidelines for selecting and allocating county-wide population projections used to assist in the overall analysis and designation of UGAs for cities, UGAs not associated with cities, and potential growth in rural areas. County-wide population must be within the range of projections provided by OFM for the 20-year planning period.

This section of the WAC also encourages consideration of other population-related factors including: population forecasts from outside agencies or service providers; historical Census data; the ability of counties and cities to meet the financial obligation to support the population projection they plan for; the land supply and density of uses that will efficiently accommodate the population projection; more frequent review and update of UGAs than the required minimum 8-year review⁶⁷; and integration of employment forecasts from the selected population projection that will be allocated to UGAs and the rural area.

Growth Management Hearings Board Cases

The following case summaries are reprinted from Growth Management Hearings Board digests. These cases address how jurisdictions plan for population in Urban Growth Areas. Full texts of cases may be obtained from the Hearings Board website at www.gmhb.wa.gov

There must be urban levels of sanitary sewer provided to the entire UGA [by the end of the planning period], not within 20 years of the date of subsequent approval of development on holding tanks. This is because the designation of areas for urban growth must ensure that urban services are available when the urban growth occurs. The UGA boundaries may only extend as far as urban levels of service are ensured for the planning period. If urban services cannot be provided in the planning period, then the areas which cannot be served should not be designated for urban growth, i.e. included in the UGA. Moreover, if urban levels of service will not be provided at the time of development, development must be phased so that there are not urban levels of development until urban services are provided. In the meantime, the development that does occur within the UGA must allow for eventual urban densities, typically by platting and locating initial growth so that higher densities will be available as urban services are available. **Skagit County Growthwatch v. Skagit County, Case No. 07-2-0002, FDO at 62-63 (Aug. 6, 2007)**

A county must base its UGAs on OFM's twenty-year population projection, collect data and conduct analysis of that data to include sufficient areas and densities for that twenty-year period (including deductions for applicable lands designated as critical areas or natural resource lands, and open spaces and greenbelts), define urban and rural uses and development intensity in clear and unambiguous numeric terms, and specify the methods and assumptions used to support the IUGA designation. In essence, a county must "show its work" so that anyone reviewing a UGAs ordinance, can ascertain precisely how the county developed the regulations it adopted. [**Tacoma, 94-3-0001, FDO, at 19.**]

A proper UGA location involves more than just population projections. **Achen v. Clark County 95-2-0067 (FDO, 9-20-95)**

Where an UGA would allow an approximately 40,000 increase in population, and the projected population increases amounted to approximately 27,000, the UGA did not comply with the GMA. **Dawes v. Mason County 96-2-0023 (FDO, 12-5-96)**

68

Some very fundamental issues have been resolved by virtue of the UGA designation: (1) the land use will be urban; (2) the land use designations reflect population and employment allocations made by the County; and

(3) urban services provided within the UGA should be primarily provided by cities. [**Bremerton/Alpine, 95-3-0039c/98-3-0032c, FDO, at 48.**]

The size of any UGA must be based upon the projected population growth allocated to that UGA. Since the supply of urban residential lands (18,789 acres) significantly exceeds the projected demand for such lands over the course of the 20-year planning horizon (11,582 acres), the County's UGAs fail to comply with RCW 36.70A.110. **1000 Friends v. Thurston County, WWGMHB Case No. 05-2-0002 (FDO, 7-20-05).**

[Jurisdictions have an ongoing duty to accommodate forecast and allocated population growth.] The GMA is designed to manage growth, not stop it. The GMA is dynamic, not static. The Act requires OFM to produce periodic population projections and it requires cities and counties to accommodate these new forecasts by reviewing and updating their plans and development regulations accordingly. . . RCW 36.70A.110 imposes a consistent and ongoing duty for all GMA jurisdictions. . . to accommodate the ensuing growth periodically projected by OFM and allocated [by the counties]. Simply put, so long as the state and region continue to grow, counties and cities must continue to plan for, manage, and accommodate the projected and allocated growth. [**Kaleas, 05-3-0007c, FDO, at 11-12.**]

RCW 36.70A.110(2) and .130(3) contain two compatible and major directives. The first is that the State Office of Financial Management (OFM) must project population ranges for each GMA county. These are the population drivers, the urban growth, which the county, in conjunction with its cities must accommodate. Second, this section of the Act directs the county and its cities to include areas and densities sufficient to permit the urban growth that is projected to occur. In order to comply with these directives, jurisdictions must undertake some form of land capacity analysis to determine whether their areas and permitted densities for the lands within their jurisdiction can accommodate the projected and allocated growth. Both of these GMA requirements speak in terms of providing densities to accommodate growth – compact urban development. [**Strahm, 05-3-0042, FDO, at 12.**]

Although the GMA directs counties to establish UGAs in areas which are characterized by urban growth and can have public services provided, it does not mandate the expansion of a UGA boundary solely to encompass these lands. The GMA requires the boundary of a UGA to be defined based on population projections with land

- to table of contents
- previous chapter
- next chapter
- endnotes

sufficient for growth. If land was added to a UGA simply to create a LOB [logical outer boundary] or because they may be urban in character, without any correlation to population or sufficiency, then these GMA requirements would become meaningless. **City of Zillah v. Yakima County, Case No. 08-1-0001, FDO at 32 (Aug. 10, 2009)**

Court Cases

The following case summaries are reprinted from Washington State Courts and address how jurisdictions plan for population in Urban Growth Areas. Full texts of cases may be obtained from the Court's website at: <http://www.courts.wa.gov>

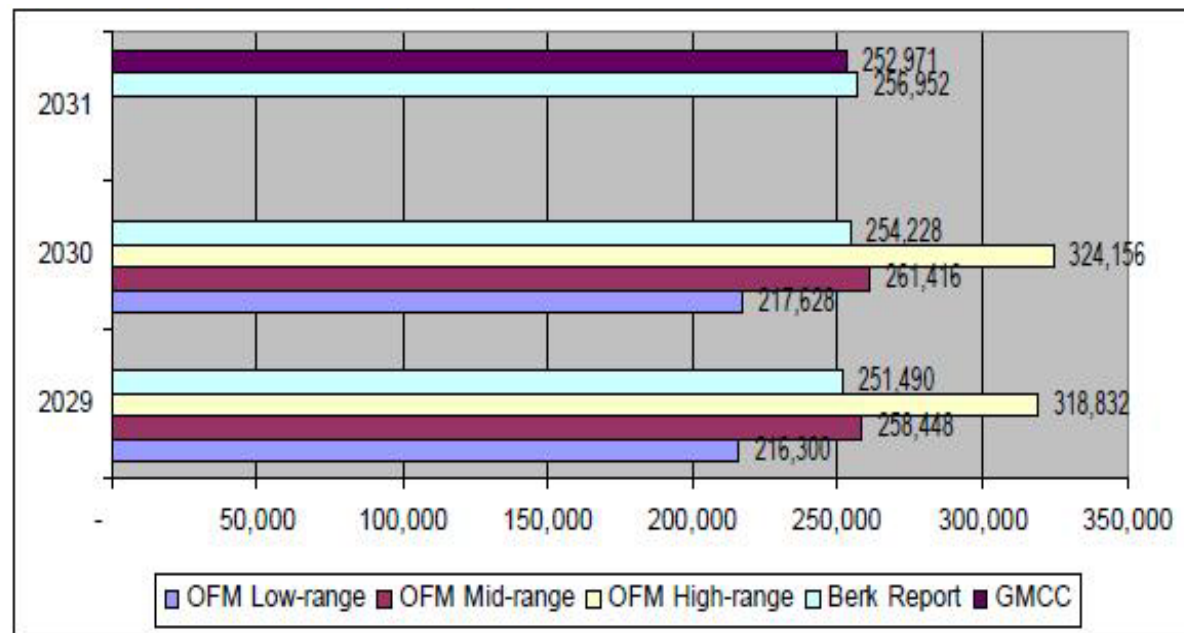
Diehl v. Mason County, 94 Wn.App. 645 (3/5/99) - A county's use of its own developed population growth projections, instead of the Office of Financial Management's projections, when determining its urban growth areas, were determined to be inconsistent with requirements of the Growth Management Act.

Thurston County v. W. Washington Growth Management Hearings Board, 164 Wn. 2d 329, decided August 14, 2008. We affirm the Court of Appeals in part and reverse in part. We hold a party may challenge a county's failures to revise aspects of a comprehensive plan that are directly affected by new or recently amended GMA provisions if a petition is filed within 60 days after publication of the county's seven year update. We hold a party may challenge a county's failure to revise its UGA designations following a 10 year update only if there is a different OFM population projection for the county. We reverse the Court of Appeals' holding that a county must identify and justify the use of a land market supply factor in its comprehensive plan. We remand the case to the Board to determine whether a land market supply factor was used and whether, based on local circumstances, the County's UGA designations were clearly erroneous. We reverse the Court of Appeals' ruling that densities greater than one dwelling unit per five acres cannot be considered in determining whether a comprehensive plan provides for a variety of rural densities. We remand the case to the Board to consider whether the various densities identified by the County in the rural element and/or the use of innovative zoning techniques are sufficient to achieve a variety of rural densities.

Coordination for Population Planning

County-wide Planning Policies, as required by RCW 36.70A.210, set the general framework for coordinated land use and population planning between the county, its cities, and others to ensure respective Comprehensive plans are consistent with each other. Agreements between a county and its cities can cover matters such as determining a population projection to plan for, UGA policies, joint planning within UGAs, agreement on annexation policies, adoption of development standards within UGAs, phasing strategies on development until urban services are in place, revenue sharing for regional services, and city and private service provider review and comment on major development within UGAs.

Figure 4-2 OFM Population Project for Whatcom County



Source: Whatcom County

Local Examples

Example 1: Whatcom County and Cities

Whatcom County and cities formed the Growth Management Coordinating Council (GMCC) for growth planning.⁶⁸ The GMCC was assembled to be a GMA policy advising committee of elected officials from Whatcom County and the cities of Bellingham, Blaine, Everson, Ferndale, Lynden, Nooksack, and Sumas. The Council was supported by a Technical Advisory Group (TAG) made up of planning directors from each jurisdiction and the coordinating staff from County Planning and Development Services. The GMCC focused on three primary issues: review of county population forecasts and ways to implement UGAs; review and update of the vision for future growth and development in the region. The GMCC made policy recommendations to

Study Area	2008 Employment	Requested Allocation	GMCC Allocation	2029-31 Requested	2008 share	Requested Share
------------	--------------------	-------------------------	--------------------	----------------------	------------	--------------------

their respective jurisdictions.

Table 4-3 Whatcom County Employment Allocations

Bellingham UGA	51,153	18,829	18,829	69,982	66.1%	53.2%
Birch Bay UGA	436	489	489	925	0.6%	1.4%
Blaine UGA	2,971	1,903	1,903	4,874	3.8%	5.4%
Cherry Point UGA	1,182	760	760	1,942	1.5%	2.1%
Columbia Valley UGA	90	455	455	545	0.1%	1.3%
Everson UGA	38	628	628	1,266	0.8%	1.8%

Ferndale UGA	5,534	4,747	4,747	9,465	7.1%	13.4%
Lynden UGA	4,832	3,559	3,559	8,391	6.2%	10.0%
Nooksack UGA	206	290	290	496	0.3%	0.8%
Sumas UGA	254	391	391	645	0.3%	1.1%
Rural	10,130	3,373	3,373	13,503	13.1%	9.5%

Source: Whatcom County

The GMCC and TAG utilized OFM projections together with population projections from its Environmental Impact Statement (EIS) and a consultant's report to recommend a 20-year population growth projection (see chart below). The GMCC also recommended an employment growth projection for the 20-year planning period of 35,424 additional county-wide jobs, based on the consultant's report and the EIS employment range of jobs. Due to the Great Recession, the GMCC recommended a slightly lower population forecast than the OFM mid-range projection and the consultant's report forecast. Each of the jurisdictions in Whatcom County made requests for population allocation to the GMCC from the overall county-wide population projection that was selected. The following tables represent the population and employment requests from each of the

Study Area	Phase II					
	2008 Population	Requested Allocation	GMCC Allocation	2029-31 Request	2008 share	Requested Share

jurisdictions:

Table 4-4 Whatcom County Population Allocation

Bellingham UGA	89,284	23,771	23,771	113,055	46.7%	37.8%
Birch Bay UGA	5,290	4,329	4,329	9,619	2.8%	6.9%
Blaine UGA	5,754	4,700	4,700	10,454	3.0%	7.5%
Columbia Valley UGA	3,924	1,076	1,076	5,000	2.1%	1.7%
Everson UGA	2,395	1,948	1,948	4,343	1.3%	3.1%
Ferndale UGA	12,019	8,687	8,687	20,706	6.3%	13.8%
Lynden UGA	11,613	7,414	7,414	19,027	6.1%	11.8%
Nooksack UGA	1,137	1,159	1,159	2,296	0.6%	1.8%
Sumas UGA	1,279	793	793	2,072	0.7%	1.3%
Rural	58,305	9,074	9,074	67,379	30.5%	14.4%
TOTALS	191,000	62,951	62,951	253,951		

Source: Whatcom County

The GMCC used an agreed-upon, consistent set of policies to determine the capacity for population growth in Whatcom County as well as for monitoring growth to ensure that the assumptions and resulting estimates are reasonable.

GMCC Population Policies

1. Establish a county-wide growth forecast for Whatcom County that represents a reasonable expectation for growth during the planning period.
2. Adopt a county-wide population forecast of 253,951⁶⁹ (62,951 additional people over 2008 estimated population) and a county-wide employment growth forecast of 35,424 additional jobs.

3. Recognize input received throughout the public process by Whatcom County and cities and provide strong preference to local proposals while addressing regional issues.
4. Support shifting growth from rural and agricultural areas into incorporated urban growth areas and into the smaller incorporated urban growth areas as the most desirable growth pattern.
5. Support coordinated efforts to transfer growth out of rural and agricultural areas.
6. Limit growth outside urban growth areas to not more than 15% of total population growth.
7. Utilize a consistent methodology for determining the capacity of Urban Growth Areas using assumptions meant to be reasonable estimates of densities expected over the long-term planning period. Periodically review the methodology and revise the assumptions if necessary to improve the accuracy of the results and account for the unique characteristics of each jurisdiction.

These GMCC recommendations and population planning policies respect the vision and goals of the individual communities in Whatcom County, yet also strive to balance the regional interests and needs. (Subsequent revisions to accommodate city requests, community concerns, and GMA compliance resulted in a final adopted county-wide population forecast with minor amendments from the recommendation by the GMCC⁷⁰).

Example 2: Snohomish County and Cities

The County-wide Planning Policies (CPP)^[1] of Snohomish County and cities, working in concert with the Puget Sound Regional Council's (PSRC) Vision 2040 and Regional Growth Strategy, established a multi-jurisdictional coordination process for determining population projections and population allocations to each jurisdiction using the Snohomish County Tomorrow process. Snohomish County Tomorrow (SCT) is a cooperative and collaborative public inter-jurisdictional growth management advisory forum consisting of representatives from the county and each of the cities, as well as from the Tulalip Tribe. Authorized by RCW 36.70A.215 and the CPPs, Snohomish County and cities utilize the Buildable Lands Program to track densities and types of development occurring in the jurisdictions, with the planned densities and types of development adopted in local comprehensive plans. The Buildable Lands Program enables the county and cities to initiate policy techniques to increase consistency between actual densities and types of development with planned densities and development.

- [to table of contents](#)
- [previous chapter](#)
- [next chapter](#)
- [endnotes](#)

Snohomish County-wide Planning Policies include General Framework (GF) policies that define and broaden the objectives of their overarching Central Principles, while setting the stage for cooperative action. Of particular relevance to population planning for Snohomish county and cities are GF policies 5 – 7, as follows:

GF-5 Subcounty allocation of projected growth shall be established for purposes of conducting the ten-year⁷¹ UGA review and plan update required by the Growth Management Act at RCW 36.70A.130(3). This allocation shall occur through a cooperative planning process of Snohomish County Tomorrow and be consistent with the Countywide Planning Policies. The allocation shall include cities (within current city boundaries), unincorporated Urban Growth Areas (UGAs), unincorporated Municipal Urban Growth Areas (MUGAs), and the rural/resource area of Snohomish County. The subcounty allocation shall use the most recent Office of Financial Management population projections for Snohomish County and the Puget Sound Regional Council's Regional Growth Strategy (RGS) as the starting point for this process. The process shall consider each community's vision and its regional role as described in the RGS. The process shall ensure flexibility for jurisdictions in implementing the RGS. Such implementation shall seek compatibility with the RGS, considering levels of infrastructure investment, market conditions, and other factors that will require flexibility in achieving growth allocations. The subcounty allocation of projected growth shall be depicted as a set of —growth targets, and shall be shown in Appendix B of the countywide planning policies. The growth targets shall indicate the amount of growth each jurisdiction is capable of accommodating over the 20-year planning period, as described in its comprehensive plan. The growth target development process in Snohomish County shall use the procedures in Appendix C, which call for the following steps:

- a. Initial Growth Targets;
- b. Target Reconciliation; and
- c. Long Term Monitoring.

GF-6 Ensure that the final population allocation for Urban Growth Areas supports the Regional Growth Strategy as provided for in VISION 2040. This shall include assigning at least ninety percent (90%) of the county's future population growth after 2008 to urban areas.

GF-7 Maintain the review and evaluation program, which includes an annual data collection component, pursuant to RCW 36.70A.215 (Buildable Lands Program). Complete the evaluation component required by the Buildable Lands Program at least once every five years. This evaluation may be combined with the review and evaluation of County and city comprehensive land use plans and development regulations required by RCW 36.70A.130(1), and the review of Urban Growth Areas required by RCW 36.70A.130(3).

- a. Use the procedures report in Appendix E for the Buildable Lands Program.
- b. A list of reasonable measures that may be used to increase residential, commercial and industrial capacity in UGAs, without adjusting UGA boundaries, is contained in Appendix D. The County Council shall use the list of reasonable measures and guidelines for review contained in Appendix D to evaluate all UGA boundary expansions proposed pursuant to DP-2.

Snohomish County and cities implement their General Framework (GF) policies listed above through the following multi-jurisdictional process:

Growth Target Procedure Steps for GF-5⁷²

1. Initial Growth Targets: Initial population, housing, and employment projections shall be based on the following sources:

- a. The most recently published official 20-year population projections for Snohomish County from the Office of Financial Management (OFM);
- b. The Puget Sound Regional Council's (PSRC) most recent population and employment distribution as represented in the VISION 2040 Regional Growth Strategy (RGS) ; and
- c. A further distribution of the population and employment RGS allocations to jurisdictions in each of the PSRC regional geographies in Snohomish County to arrive at initial subcounty population, housing, and employment projections.

Results of the initial growth target allocation process shall be shown in Appendix B of the CPPs. These initial allocations shall be used for at least one of the plan alternatives evaluated by jurisdictions for their GMA plan updates.

- to table of contents
- previous chapter
- next chapter
- endnotes

2. Target Reconciliation: Once the GMA comprehensive plan updates of jurisdictions in Snohomish County are adopted, the Snohomish County Tomorrow (SCT) process shall be used to review and, if necessary, adjust the population, housing, and employment growth targets contained in Appendix B⁷³ of the CPPs.

a. The County and cities shall jointly review the preferred growth alternatives in adopted local comprehensive plans for discrepancies with the target allocation associated with the County's preferred plan alternative.

b. Based on the land supply, permitted densities, capital facilities, urban service capacities and other information associated with the preferred growth alternatives of adopted local comprehensive plans, the Planning Advisory Committee (PAC) of SCT shall recommend to the SCT Steering Committee a reconciled 20-year population, housing, and employment allocation.

c. The SCT Steering Committee shall review and recommend to the County Council a reconciled 20-year population, housing, and employment allocation. Substantial consideration shall be given to the plan of each jurisdiction, and the recommendation shall be consistent with the GMA and the CPPs.

d. The County Council shall consider the recommendation of the Steering Committee and shall replace Appendix B of the CPPs with a reconciled 20-year population, housing, and employment allocation.

3. Long Term Monitoring: Subsequent to target reconciliation, SCT shall maintain a long term monitoring process to review annually the population, housing, and employment growth targets contained in Appendix B of the CPPs.

a. Snohomish County and the cities shall jointly monitor the following:

i. Estimated population and employment growth;

ii. Annexations and incorporations;

iii. Residential and non-residential development trends;

iv. Availability and affordability of housing.

b. Results of the target monitoring program shall be published in a growth monitoring report developed by the PAC.

4. Target Adjustments: *The SCT process may be used to consider adjustments to the population, housing, and employment growth targets contained in Appendix B of the CPPs.*

a. Based on the results of the long term monitoring process, the PAC may review and recommend to the SCT Steering Committee an adjustment to the population, housing, and employment targets.

b. The SCT Steering Committee shall review a PAC recommendation to adjust growth targets and may recommend to the County Council, an adjustment to the population, housing, and employment targets. Adjustments to the growth targets shall be based on the results of the target monitoring program and shall be consistent with the GMA and the CPPs.

c. The County Council shall consider the recommendation of the Steering Committee and may amend Appendix B of the CPPs with adjusted population, housing, and employment targets for cities, UGAs, and rural areas.

Snohomish County and cities have an iterative population planning process and Buildable Lands Program that provides for monitoring, and adjustments if needed, so each jurisdiction is capable of accommodating its population allocation for the 20-year planning period, as described in its comprehensive plan.

Whatcom and Snohomish Counties and their cities have established a commendable collaboration process comprised of its elected officials, technical staffs, and citizens. The process for each county and cities is guided by set of locally established policies, consistent with the GMA, to determine a reasonable county-wide 20-year population and employment projection. The collaboration process for both counties provides for allocating a percentage of the total population to each city and the county - that can be supported by each jurisdiction's comprehensive plan, capital facilities plan, and development regulations.

In its State of the Cities 2011 Report, the Association of Washington Cities survey shows the relationship of growing city populations versus rural population and the challenges of keeping up with the urban service needs to support the growth trend in cities.

- to table of contents
- previous chapter
- next chapter
- endnotes

“Although the rate of population growth is slowing, it continues to pose a challenge for cities in building and maintaining infrastructure. Some cities grew so quickly in the early part of the 21st century they are still trying to catch up in providing basic services, such as expanding wastewater capacity and meeting transportation concurrency requirements.”⁷⁴

In the next chapter, we will examine the Land Capacity Analysis methodologies for determining the amount of available residential, commercial, and industrial lands within UGAs to meet potential growth demands. The chapter will also examine other local land use needs within UGAs; how open space, critical areas, and resource lands affect UGA designations; and the Buildable Lands Program.

Endnotes

⁵⁷ Association of Washington Cities, 2009 *State of the Cities Report*

⁵⁸ <http://www.ncsl.org/issues-research/tribal/trust-land-overview.aspx>

⁵⁹ RCW 36.70A.130

⁶⁰ RCW 36.70A.070(1)

⁶¹ RCW 36.70A.115

⁶² RCW 36.70A.070(2)

⁶³ RCW 36.70A.110(2)

⁶⁴ RCW 36.70A.350(1)

⁶⁵ WAC 365-196-300(4)(c)

⁶⁶ <http://apps.leg.wa.gov/WAC/default.aspx?cite=365-196-310>

⁶⁷ RCW 36.70A.130

⁶⁸ <http://www.co.whatcom.wa.us/pds/2031/projects/gmcc/index.jsp> Growth Management Coordinating Council, *UGA Review Policy paper*

⁶⁹ Subsequent revisions to the overall forecast and city allocations adopted August 2010: 247,755

⁷⁰ <http://www.co.whatcom.wa.us/pds/2031/uga/2010-activity.jsp> Ordinance 2010-037

[¹] <http://www1.co.snohomish.wa.us/Departments/PDS/Services/PlansandPolicies.htm>

⁷¹ RCW 36.70A.130, Amended by 2010 State Statute to 8-year review and update

⁷² <http://www1.co.snohomish.wa.us/Departments/PDS/Services/PlansandPolicies.htm>

⁷³ <http://www1.co.snohomish.wa.us/Departments/PDS/Services/PlansandPolicies.htm>

⁷⁴ Association of Washington Cities, *State of the Cities 2011 Report*

- to table of contents
- previous chapter
- next chapter
- endnotes

Chapter 5

Land Capacity Analysis and Buildable Lands Program for Urban Growth Areas

A Land Capacity Analysis (LCA)⁷⁵ is a methodology conducted by counties and cities to determine the amount of vacant, partially used, under-utilized lands, and redevelopment potential of built properties, to accommodate growth. Counties and cities utilize a LCA to determine if the existing or potential Urban Growth Areas (UGAs) can accommodate twenty years of urban growth. Pursuant to RCW 36.70A.110(2):

Based upon the growth management population projection made for the county by the office of financial management, the county and each city within the county shall include areas and densities sufficient to permit the urban growth that is projected to occur in the county or city for the succeeding twenty-year period, except for those urban growth areas contained totally within a national historical reserve. As part of this planning process, each city within the county must include areas sufficient to accommodate the broad range of needs and uses that will accompany the projected urban growth including, as appropriate, medical, governmental, institutional, commercial, service, retail, and other nonresidential uses. Each urban growth area shall permit urban densities and shall include greenbelt and open space areas. In the case

of urban growth areas contained totally within a national historical reserve, the city may restrict densities, intensities, and forms of urban growth as determined to be necessary and appropriate to protect the physical, cultural, or historic integrity of the reserve. An urban growth area determination may include a reasonable land market supply factor and shall permit a range of urban densities and uses. In determining this market factor, cities and counties may consider local circumstances. Cities and counties have discretion in their comprehensive plans to make many choices about accommodating growth.

The GMA enables counties and cities to exercise discretion in their comprehensive plans to make choices on how they plan to accommodate growth. Some growth will naturally occur in rural areas. However, the primary purpose of the LCA methodology is to assist in determining the adequacy and sizing of UGAs to achieve the goals of the GMA for balanced urban development with adequate and cost-efficient urban services.

A LCA can also be used to determine whether counties and cities are able to meet the GMA goals and requirements to provide for a range of housing types and densities for all economic segments of the population⁷⁶. Having an appropriate land supply within UGAs is paramount to meet the GMA's requirement for accommodating, twenty years of potential growth. In order to determine whether counties and cities have appropriate land in UGAs, a land use inventory must be conducted to determine if the available land supply aligns with the anticipated 20-year population and employment growth projections.

The LCA methodology has been adopted in County-wide Planning Policies across the state. Local LCA methodologies have improved to better analyze local conditions and provide timely data for counties and cities as they look forward in reviewing and updating their comprehensive plans, development regulations, UGAs, and Buildable Lands Program reports.

Six counties in the Buildable Lands Program⁷⁷ (Clark, King, Kitsap, Pierce, Snohomish, and Thurston) and the cities and towns within their boundaries, have special requirements related to UGAs. Utilizing a LCA, Buildable Lands Program jurisdictions first look back on recent development activity and density patterns to determine if local planning policies are achieving desired outcomes. These counties and cities are then better prepared to look forward to plan for the next twenty years of potential growth. Adopted by the Legislature in 1997, RCW 36.70A.215 requires these counties and cities to gather data annually in preparation for their required review and update⁷⁸, on the density and type of development that is occurring. This information is to be compared to the density and type of development expected, as identified in local comprehensive plans. If gaps are found in this analysis, measures are to be adopted that will increase consistency during the next update period. Policy

- [to table of contents](#)
- [previous chapter](#)
- [next chapter](#)
- [endnotes](#)

techniques, other than adjusting urban growth boundaries, are to be used first to achieve consistency between planned development and actual development patterns.

Initial reports developed by the counties in the Buildable Lands Program addressed whether their UGAs contain adequate development capacity to accommodate the state population forecast as well as projected employment growth for their area. Residential, commercial, and industrial land uses were analyzed. All initial county reports indicate that their overall UGAs had adequate capacity to meet growth demands as indicated in their adopted Comprehensive plans. Reporting for the Buildable Lands Program jurisdictions is an on-going process that supports the review and update timelines of RCW 36.70A.110, RCW 36.70A.130, and RCW 36.70A.215.

This chapter of the guidebook will examine the basic LCA methodology provided by Commerce in 1992 together with guidance from the Commerce Buildable Lands Program. Direction is also provided from the statutes and Washington Administrative Code (WAC) for determining the amounts of available lands in UGAs, together with direction from Growth Management Hearings Board and court cases relevant to LCA for determining UGAs. A model example of a county and its cities' LCA for evaluating their UGAs and a model example of a county's Buildable Lands Program methodology and reporting is also provided in this chapter.

Land Capacity Analysis Methodology

Consistent with RCW 36.70A.190 to provide technical assistance, Commerce established the Land Capacity Analysis (LCA) methodology in its 1992 UGA Guidebook⁷⁹ to assist jurisdictions in conducting land use inventories to determine their vacant, partially used, and under-utilized lands. During the past twenty years, this methodology has evolved at the local level to now include:

- Changing land and improvement values⁸⁰;
- Multiple market factors;
- Market conditions;
- Redevelopment potential;

- Employment capacity of commercial and industrial sectors;
- Compatible development in some critical areas;
- Proximity to infrastructure and capacity of infrastructure;
- Policies and innovative standards that can increase development potential;
- New technologies for data gathering and analyzing the capacity of UGAs.

Two of the more progressive LCA and Buildable Lands Program methodologies of fully planning counties and their cities are described later in this chapter. The original 1992 methodology listed the following eight steps and definitions to help communities initially identify potential lands to accommodate growth:

1. “Identify lands which are potential candidates to accommodate future growth-vacant, partially-used, and under-utilized land (in other words, subtract all parcels committed to other uses).
2. Subtract all parcels that your community defines as not developable because of physical limitation. For instance, once you have identified critical areas, such as wetlands, and have established plan policies and regulations prohibiting development in these areas, subtract these areas from the initial land supply pool.
3. Subtract lands which will be needed for other public purposes. This includes utility corridors, landfills, sewage treatment plants, recreation, schools, and other public uses (GMA, Section 15, RCW 36.70A. 150).
4. Subtract all parcels which your community determines are not suitable for development for social and economic reasons. For instance, if you have adopted plan policies and regulations protecting historic districts or certain agricultural lands, or if from a market standpoint the land is not likely to develop within 20 years, subtract these from land supply.
5. Subtract all parcels which you assume will not be available for development within your plan's 20-year timeframe. Assume that a certain percent of vacant, under-utilized, and partially-used lands will always be held out from development.
6. Build in a safety factor. If you are unable to monitor land supply on a regular basis, consider building in a safety factor of land in addition to your projected 20-year land area needs to assure adequate availability and choice at all times.

- [to table of contents](#)
- [previous chapter](#)
- [next chapter](#)
- [endnotes](#)

7. Determine total capacity. After determining desirable densities and land uses for various areas within your jurisdiction, multiply the number of acres in remaining parcels by the number of units per acre allowed in the area where the parcel is located. Add together to determine total capacity of vacant, under-utilized, and partially-used land.
8. Draw the urban growth boundaries for your jurisdiction which meet criteria you have set. Include enough developable, suitable, and available vacant, under-utilized or partially-used land area to meet your share of projected growth.

Vacant land is defined as land which has no structure or has a building improvement value of less than \$500. This means that land which is occupied by a shack, abandoned building or other very low-value improvement will be considered vacant.

Partially-used parcels are those occupied by a use which is consistent with zoning but contains enough land to be further subdivided without need of rezoning. For instance, a single house on a ten acre parcel, where urban densities are allowed, is partially developed.

Under-utilized parcels are those zoned for more intensive use than that which currently occupies the property. For instance, a single-family home on multifamily zoned land will be considered under-utilized.”

Sizing an UGA is a delicate balance. Too large of UGA can lead to inefficient land utilization with low density leap-frog type development that lacks the financial capacity to generate adequate revenues to pay for urban services. Conversely, an undersized UGA may eventually constrain the land supply and drive up the cost of available land during the 20-year planning period.

Many jurisdictions fully planning under the GMA use a Geographic Information System (GIS) to conduct their land use inventory of vacant, partially used, and under-utilized land. A GIS integrates computer hardware, geographic software, and geographic data to analyze, model, and display real world information. Typical county-city GIS data layers include: parcel boundaries combined with related data tables (e.g. owner, improvement, value, and use information); zoning and comprehensive plan layers; critical areas (wetlands, flood plains, habitat, geologic hazard areas, ground water); urban service areas; Census demographics; building permits; plats; aerial photography; and topography. Overlaying these GIS layers together can enable queries of the GIS such as the following:

- Show all vacant parcels, greater than (X), with urban residential zoning, critical areas deducted, within a public sewer service area, with public water, and not platted.
- Calculate the total acreage of these parcels; subtract (X%) land for infrastructure and market factors; multiply the net acreage balance by the permitted average density of the zoning.

The above GIS queries calculate a potential number of housing units. Total number of housing units can then be multiplied by recent Census demographic data for average household size, to determine the population capacity of this residential zoned land.

High resolution aerial photography can be utilized to ground-truth GIS queries as well as to improve the accuracy of individual GIS data layers for future queries. Once a GIS contains the necessary data layers and programming, periodic monitoring of the land supply and development activity is possible. GIS monitoring can also provide feedback for local decision makers to determine if a jurisdiction's planning policies are being achieved and if its UGA is sized appropriately⁸¹. On-going monitoring of the land supply, infrastructure capacity, development costs and activity, market conditions, and achieved densities are also of critical importance to jurisdictions conducting periodic review and update of their UGAs⁸².

Conducting this type of GIS analysis for each zoning classification within an UGA can yield calculations of the overall population and employment capacity. Total capacity determined by the LCA should then be compared to the population and employment projection selected for the 20-year planning period. Adjustments may be needed to the population projection or the planning policies guiding density and development or the size of the UGA, to align the land capacity to a final population and employment projection.

GMA Statutes

"Urban growth" refers to growth that makes intensive use of land for the location of buildings, structures, and impermeable surfaces to such a degree as to be incompatible with the primary use of land for the production of food, other agricultural products, or fiber, or the extraction of mineral resources, rural uses, rural development, and natural resource lands designated pursuant to RCW 36.70A.170. A pattern of more intensive rural development, as provided in RCW 36.70A.070(5)(d), is not urban growth. When allowed to spread over wide areas, urban growth typically requires urban governmental services. "Characterized by urban

- [to table of contents](#)
- [previous chapter](#)
- [next chapter](#)
- [endnotes](#)

growth" refers to land having urban growth located on it, or to land located in relationship to an area with urban growth on it as to be appropriate for urban growth⁸³.

RCW 36.70A.170 requires all counties and cities in the state to designate natural resource lands and critical areas. Resource lands include agricultural, forest, and mineral lands. Critical areas include wetlands and associated buffers, fish and wildlife habitat, geological hazardous area, frequently flooded areas, and critical aquifer recharge areas. By designating these resource and critical area lands, counties and cities narrow the scope of lands to analyze for potential UGAs.

The scope of a Land Capacity Analysis is further defined by the locational criteria of RCW 36.70A.110(3), providing:

“Urban growth should be located first in areas already characterized by urban growth that have adequate existing public facility and service capacities to serve such development, second in areas already characterized by urban growth that will be served adequately by a combination of both existing public facilities and services and any additional needed public facilities and services that are provided by either public or private sources, and third in the remaining portions of the urban growth areas. Urban growth may also be located in designated new fully contained communities as defined by RCW 36.70A.350.”

Helpful Guidance from the Washington Administrative Code

Commerce updated the Washington Administrative Code (WAC) for the GMA in 2010 with new sections added on determining available lands for UGAs. The following guidelines describe how a land capacity analysis can be used to manage growth within UGAs:

WAC 365-196-325 Providing sufficient land capacity suitable for development⁸⁴

This section of the WAC provides direction for counties and cities to ensure that they have sufficient land capacity suitable for development within their jurisdiction to accommodate twenty years of allocated housing and employment growth, as adopted in their county-wide planning policies and consistent with the OFM 20-year population forecast. To demonstrate compliance with the GMA, counties and cities must conduct a Land Capacity Analysis to: determine the sufficiency of land over the long-term to accommodate potential growth;

determine appropriate areas; determine capacity based on the allowed density adopted in development regulations; consider the effects of development phasing on capacity, if a jurisdiction has adopted a phasing program.

WAC 365-196-315 Buildable lands review and evaluation⁸⁵

This section of the WAC provides guidance for jurisdictions to analyze and determine if urban densities are being achieved in their UGAs by comparing locally adopted goals and policies with actual development. The analysis would include commercial, industrial, and residential lands and whether the land capacity within the UGA for these lands will accommodate the 20-year population and employment projections adopted by counties and cities. Should the analysis show there is insufficient land capacity, reasonable policy measures must first be implemented that increase consistency for subsequent updates pursuant to RCW 36.70A.130. The six counties in the Buildable Lands Program include: Clark, King, Kitsap, Pierce, Snohomish, Thurston, and the cities within each county.

The WAC also provides guidance to adopt county-wide planning policies to implement the Buildable Lands Program for: collection of data; reporting data; resolving disputes among participating jurisdictions; adopting amendments to increase consistency with local planning policy and the GMA; lead agency responsibility; timelines to implement reasonable measures for consistency; public participation; reporting at five year intervals; determination of consistency or inconsistency; measures to address inconsistencies⁸⁶.

Growth Management Hearings Board Cases

The following case summaries are reprinted from Growth Management Hearings Board digests. These cases address how jurisdictions determine the amount and suitability of available land for Urban Growth Areas. Full texts of these and other relevant cases regarding sizing UGAs may be obtained from the Hearings Board website at www.gmhb.wa.gov.

A Land Capacity Analysis (LCA) is a requirement arising from RCW 36.70A.110 for all counties planning under the GMA. This section of the GMA relates to the designation of UGAs and the requirement that each UGA shall include areas and densities sufficient to permit the urban growth that is projected to occur in the county or city for the succeeding 20-year period. The LCA is a critical mechanism for the sizing of a UGA because it is utilized to

- [to table of contents](#)
- [previous chapter](#)
- [next chapter](#)
- [endnotes](#)

determine how much urban land is needed. Therefore, in contrast to the Buildable Lands Report, the LCA is prospective – looking forward over the coming 20 years to see if there is enough land within the UGA to accommodate the growth that has been allocated to the area. In certain counties, the LCA is now underscored by the Buildable Lands Report required by RCW 36.70A.215. *Friends of Skagit County, et al v. Skagit County*, Case No. 07-2 0025c (Order on Reconsideration, June 18, 2008) at 15.

The requirement that urban growth should be directed to appropriately-sized and delineated UGAs is one of the main organizing principles of the GMA’s approach to planning for growth. To determine the appropriate size and location of an UGA requires an appropriate analysis, variously called a “land capacity analysis” or a “land quantity analysis.” That analysis includes two interrelated components: (1) counties first must determine how much land should be included within UGAs to accommodate expected urban development, based on the OFM population projections; (2) counties must determine which lands in particular should be included within UGAs, based on the “locational criteria” provided in RCW 36.70A.110(1) and (3). *Kittitas Conservation v. Kittitas County*, EWGMHB Case No. 07-1-0004c, FDO, at 65 (Aug. 20, 2007).

See *Streicher v. Island County*, Case No. 08-2-0015, FDO at 6-15 (Sept 29, 2008) for a general discussion in regards to the land capacity analysis for the sizing of a UGA and locational criteria, which noted for sizing: (1) requirement to size the UGA for the 20-year projected population growth; (2) to determine whether there is enough land to accommodate projected, new growth by subtracting acreage which currently contains structures, areas that are impacted by critical areas, and areas which would be utilized to provide for future public use, including rights-of-way, sewer or water treatment facilities, parks and schools, along with the application of a reasonable market factor so as to ascertain a net developable acreage; and (3) once all reductions have been applied, the true net developable acreage is compared to the population demand in order to determine if a UGA is appropriately sized based on proposed uses and densities. And for locational criteria, RCW 36.70A.110, when read in conjunction with RCW 36.70A.030(18), provides that land “characterized by urban growth” is not just land that has urban growth on it but that is also land located in relationship/proximity to an area of urban growth.

[T]he Board reads the GMA as authorizing the use of a reasonable land market supply factor which is intended to reduce the total net buildable acreage of land within a UGA by a set percentage to account for the fact that not all buildable land will be developed within the 20-year planning horizon. Whether a jurisdiction calls this

adjustment a land availability factor, a market factor, a safety factor, or a cushion – it serves the same purpose ... Thus, Petitioners’ contention that Bellingham was permitted to use a “land availability factor” intended to reflect that not all developable land will be available for development and a “safety factor” intended to provide for an excess of land so as to assure affordability is not supported by the GMA. To size the UGA in excess of the acreage required to accommodate the urban growth projection based upon any other reduction factor other than market factor is simply not authorized by the GMA. Petree, et al v. Whatcom County, Case No. 08-2-0021c, FDO at 30-31 (Oct 13, 2008)

A county must base its UGAs on OFM’s twenty-year population projection, collect data and conduct analysis of that data to include sufficient areas and densities for that twenty-year period (including deductions for applicable lands designated as critical areas or natural resource lands, and open spaces and greenbelts), define urban and rural uses and development intensity in clear and unambiguous numeric terms, and specify the methods and assumptions used to support the IUGA designation. In essence, a county must “show its work” so that anyone reviewing a UGAs ordinance, can ascertain precisely how the county developed the regulations it adopted. [Tacoma, 94-3-0001, FDO, at 19.]

Spokane County adopted a procedure for establishing boundaries for UGAs, which included a land quantity analysis methodology. (Adopted 10-31-95 and CWPP Urban #19, Urban Growth Area Revisions 9/30/97.) This methodology made no provision for a developer-provided land quantity analysis. The methodology did establish a careful method of reports, format and Technical and Steering Committees review. The County’s methodology incorporated CTED’s recommended process, modified to reflect local conditions. It is clear from the methodology adopted by Spokane County that the analysis provided by the proponent/developer is insufficient and unacceptable. (CWPPs Policy Topic 1 found in prior and amended versions of the Policies). It is clear from the 1998 and 2004 versions of the CWPPs that it is the local jurisdictions that are responsible for the preparation of land quantity and population analysis. (Policy Topic 1, #19 in 1998 and #16 and #17 in 2004). Moitke/Neighborhood Alliance of Spokane v. Spokane County, et al, EWGMHB Case No. 05-1-0007, FDO, (Feb. 14, 2006).

Continued incremental movement of an UGA boundary that promotes sprawl and inefficient use of tax money did not comply, and also substantially interfered, with the goals of the GMA. Achen v. Clark County 95-2-0067 (RO 11-20-96)

- [to table of contents](#)
- [previous chapter](#)
- [next chapter](#)
- [endnotes](#)

An adjustment to UGAs must be done by the County through the County Council, supported by a county-wide land capacity analysis. UGA expansions cannot be unilaterally done by community advisory groups, nor . . . by cities – these decisions are made by the County from a county-wide perspective. [Bonney Lake, 05-3-0016c, FDO, at 34.]

Board decisions have wrestled with the question of whether land that has better characteristics for a desired economic purpose can be added to a UGA that is already oversized. In each of these cases, the antisprawl/UGA sizing requirements of the GMA trump the economic development goals of the local jurisdiction. If the Town or County find that they have not planned adequately for all the non-residential needs of the UGA, the remedy is re-designation of excess residential land for industrial or other uses, not incremental expansion of the UGA. North Clover Creek, 10-3-0003c, FDO (8-2-10) at 46.

A Buildable Lands Report (BLR) is a requirement arising from RCW 36.70A.215 for six counties and their cities – Clark, King, Kitsap, Pierce, Snohomish, and Thurston. Any other county may prepare a BLR, but it is not required. The primary purpose of the BLR is to review whether a county and its cities are achieving urban densities within the UGAs by comparing growth and development assumptions, targets, and objectives set forth in the countywide planning policies and comprehensive plans with actual growth and development that has occurred over the past five years in the county and its cities. The BLR is retrospective – looking back over the past five years of development to see how well the county and its cities have performed. The information developed through the BLR provides important information for updating and, perhaps, revising a County's Land Capacity Analysis. Friends of Skagit County, et al v. Skagit County, Case No. 07-2-0025c, Order on Reconsideration, at 16 (June 18, 2008).

Court Cases

The following case summary is reprinted from Washington State Courts and address how jurisdictions and Growth Management Hearings Boards consider market supply factor in sizing Urban Growth Areas. Full texts of cases may be obtained from the Court's website at: <http://www.courts.wa.gov>

Thurston County v. W. Washington Growth Management Hearings Board, 164 Wn. 2d 329, decided August 14, 2008. We affirm the Court of Appeals in part and reverse in part. We hold a party may challenge a county's failures to revise aspects of a comprehensive plan that are directly affected by new or recently amended GMA provisions if a petition is filed within 60 days after publication of the county's seven year update. We hold a party may challenge a county's failure to revise its UGA designations following a 10 year update only if there is a different OFM population projection for the county. We reverse the Court of Appeals' holding that a county must identify and justify the use of a land market supply factor in its comprehensive plan. We remand the case to the Board to determine whether a land market supply factor was used and whether, based on local circumstances, the County's UGA designations were clearly erroneous. We reverse the Court of Appeals' ruling that densities greater than one dwelling unit per five acres cannot be considered in determining whether a comprehensive plan provides for a variety of rural densities. We remand the case to the Board to consider whether the various densities identified by the County in the rural element and/or the use of innovative zoning techniques are sufficient to achieve a variety of rural densities.

Local Examples

Example Land Capacity Analysis: Whatcom County⁸⁷

County-wide Planning Policies, consistent with RCW 36.70A.210 set the general framework for coordinated land use. County-wide Planning Policies or inter-local agreements should establish the local Land Capacity Analysis methodology used by a county and its cities to determine vacant, partially used, and under-utilized land for sizing UGAs.

Whatcom County and cities formed the Growth Management Coordinating Council (GMCC) for growth planning.⁸⁸ The GMCC was established as a GMA policy advising committee of elected officials from Whatcom County and the cities of Bellingham, Blaine, Everson, Ferndale, Lynden, Nooksack, and Sumas. The Council was supported by a Technical Advisory Group (TAG) made up of Planning Directors from each jurisdiction and the Coordinating Staff from the County Planning and Development Services. The Council met monthly and focused on three primary issues: review of county population forecasts and ways to implement UGAs; review and

- [to table of contents](#)
- [previous chapter](#)
- [next chapter](#)
- [endnotes](#)

update of the vision for future growth and development in the region. The GMCC made policy recommendations to their respective jurisdictions.

The GMCC relied upon the Whatcom County Land Capacity Analysis⁸⁹ methodology to make its recommendations for UGAs. The following locally enhanced methodology was utilized by the County and cities to review and update their respective UGAs:

1.0 INTRODUCTION

This document describes the detailed methodology used in Whatcom County's 2009 Land Capacity Analysis (LCA) as part of a process to review and revise Urban Growth Areas and update the Whatcom County Comprehensive plan. This document is a technical accompaniment to the conceptual Berk & Associates memo dated October 31, 2008 entitled Land Capacity Analysis – Proposed Methods, which includes the policy context and rationale behind the chosen methodology.

2.0 GEOGRAPHIC AND TIME PARAMETERS

2.1 Base Point in Time

The Technical Advisory Group (TAG) selected a base point in time, July 1, 2008, from which the developable lands inventory was measured. For the LCA, all structures existing as of July 1, 2008 will be considered developed, while everything else proposed, built or occupied after that date will be counted as future capacity. The Whatcom County Assessors data used by the County will be taken from the same point in time. This common parameter ensures consistency across jurisdictions in processing property and building activity data.

2.2 Study Area Boundaries

The Land Capacity Analysis was carried out for all UGAs in Whatcom County including both incorporated and unincorporated portions of each UGA. An analysis was done early in the comprehensive planning process using adopted UGA boundaries, and again when UGA boundary adjustments were proposed.

3.0 LAND SUPPLY ANALYSIS

3.1 Assemble Gross Developable Land Inventory

The first step in the assessment of land supply was to identify all lands within UGAs that are considered vacant, partially-used, or under-utilized. These lands comprise the Gross Developable Land Inventory.

Steps

1. Select all residential, commercial, and industrial parcels within UGAs. Distinguish between those parcels in unincorporated areas and those within incorporated cities.
2. Cross-reference local permit and plat data with selected parcels. Separate any parcels with multifamily permits, commercial/industrial binding site plans, and preliminary and final plats that have not been constructed by July 1, 2008. This includes master planned projects that have not been completely built out but have received approval for a certain number of dwelling units or commercial/industrial square footage. Only projects that have received preliminary approval will be included in this list. These developments will be considered pending capacity and will be added to the final land capacity total at the end of the process. (see Section 5.1).
3. If necessary, update any Assessors' parcel records that have not incorporated recent plat or permit data issued before July 1, 2008.
4. Select developable parcels that are vacant, partially-used, or under-utilized. Use GIS processes and database queries to apply the definitional thresholds listed in Exhibit 1.
5. Make adjustments for mobile homes. The primary concern is that some mobile home parks may show up as vacant if the mobile home value is not captured in the Assessors' improvement value data. County staff will use aerial imagery to truth check developable parcel designations against known areas with mobile home developments. Local jurisdictions will also be given an opportunity to review developable land and mobile home park issues in the local jurisdiction review phase described later. If mischaracterized mobile home parks are identified, manually adjust the developable category designation in the land inventory database.

Exhibit 1: Developable Land Definitional Thresholds

Category	Parcel Type	Definition
Vacant	All Residential, Commercial, Industrial	Improvement Value <\$10,000; exclude all parcels <2,400 sq ft in size

Partially-Used	Single-Family	Parcel size > 3 times minimum allowed under zoning; Don't count parcels with improvement value > 93 rd percentile of jurisdiction improvement values unless the parcels sized is ? 3 times the minimum allowed under zoning
	Multifamily, Commercial, Industrial	n/a
Under-Utilized	Single Family	n/a
	Multifamily, Commercial, Industrial	<ol style="list-style-type: none"> 1. Multifamily, commercial, and industrial zoned parcels occupied by single-family residential uses 2. Ratio between improvement value and land value <1.0 3. Cities can identify development, such as gas stations, as fully developed when the ration of improvement value to land value is less than 1. Subtract existing floor area from database.

3.2 Deduct Critical Areas and Sensitive Environmental Areas

In the next step of the process, subtract all the sensitive environmental and critical areas from the inventory of vacant, partially-used, and under-utilized parcels.

Steps

1. Integrate local jurisdiction critical area data with County base data. The following types of critical areas will be included in the analysis.

Wetlands: The primary source of wetlands data available to the County is National Wetlands Inventory (NWI) data, which is estimated by staff to include only 25%-50% of actual wetlands county-wide. Coupled with a few additional wetlands data sets, the County has a wetlands dataset estimated to include 50%-75% of all wetlands. These estimates of wetland accuracy are county-wide, including forested and rural areas

where the accuracy of aerial images obscure wetlands. The accuracy of the data within urban areas is far higher, and in many cases, local jurisdictions have a more accurate wetlands inventory that the County has used to update its wetlands dataset for the purpose of this analysis.

Streams: Since the ordinary high water mark is not universally available in County GIS layers, the County's base stream dataset with stream centerlines and an assumed 25 feet of non-buildable area on either side of the centerline will be used in the analysis.

Steep Slopes and Seismic Soils: The County will subtract all areas with slopes greater than 35% since there are generally no restrictions on development where slopes are less than 35%. This value is consistent with several other GMA counties that subtract steep sloped areas. The County will also subtract areas with extensive peat soils that are undevelopable. Areas impacted by alluvial fan hazard areas and regulations restricting land division will also be subtracted.

Floodplain: All land in the floodway will be removed from the inventory. All lands within 100-year floodplains of the unincorporated portions of the Urban Growth Areas will also be removed from the inventory. All lands within floodplains of the incorporated areas will be removed from the inventory where development would be required to fill two feet above the adjacent grade, or where regulations prohibit the placement of fill in floodplains.

2. Deduct critical areas for residential parcels: Using GIS, overlay the critical areas described above on developable parcels and deduct land area where there is overlap. Critical area buffers are not deducted from residential parcels due to the variety of clustering and density transfer options available on these parcels. Later in the local jurisdiction review process, adjustments to critical area deductions can be made for cases with unique circumstances.
3. Deduct critical areas for commercial and industrial parcels: Since there are limited, if any, density transfer options for commercial and industrial parcels, critical area buffers will be deducted from these areas. Buffer distances will be based on County or city critical area ordinances and regulations.

- [to table of contents](#)
- [previous chapter](#)
- [next chapter](#)
- [endnotes](#)

4. The resulting selection of developable parcels unconstrained by critical areas will be used as the land base to calculate deductions for rights-of-way, other public uses, and market factors.

3.3 Deductions for Future Public Uses

There are a wide range of public uses that should be deducted from developable land totals including schools, police and fire stations, recreation facilities and open space.

Steps

1. Schools, police and fire facilities, and parks are the public uses most likely to have established plans for future facilities needs. These uses will be handled separately from other public uses. Where available, review existing capital facility plans for schools, police and fire facilities, and parks and identify any confirmed parcels or areas that should be deducted from the developable land inventory. Any property already owned by public institutions for future expansion as well as any known public uses in master planned areas should be identified. Deduct these parcels or acreage totals manually from the inventory if within a financially constrained plan.
2. If appropriate, analyze ownership information for parcels in the developable land inventory and exclude those owned by public entities and likely to be used for future public uses. This step may not be necessary if most future public use parcels were already excluded when the first residential, commercial, and industrial parcels were selected.
3. In order to account for other future public uses (e.g. community centers, daycare centers, churches, etc.) a 5% percent deduction on developable land is used. The deduction should be applied to the Developable Land Inventory after critical areas are removed but before any other deductions for infrastructure or market factors.
4. During the local jurisdiction review process, adjustments to the 5% other public uses deduction may be considered to account for local conditions and data availability.

3.4 Deductions for Future Infrastructure (Rights-of-Way and Other Development Requirements)

Deductions for future infrastructure, including rights-of-way (ROW) and other development requirements, will be based on the percentages of land dedicated to infrastructure in recent plats, permits, and developments.

This percentage is calculated in the analysis of recent development activity step described below in Section 4.1. Because this deduction is being carried out on land not constrained by critical areas, it is important that the infrastructure percentage deduction factors also be based on land not constrained by critical areas. If there is insufficient data to calculate deduction for infrastructure, then standard deductions based on reasonable assumptions may be used within the analysis.

Steps

1. Summarize acreage of developable land minus critical area and public use deductions by zone for each UGA.
2. Analyze recent development activity to determine infrastructure percentage deduction factors by UGA (see Section 4.1).
3. Apply these deduction factors to the inventory of developable land unconstrained by critical areas to calculate the acreage deduction for infrastructure. The infrastructure deduction may be applied by UGA or by specific zone depending on the quantity and quality of recent development activity data.

3.5 Local Jurisdiction Review

Local jurisdiction review of developable parcel designations and other deductions will occur through a series of communication and meetings between County and City staff. Some jurisdictions with complex land supply issues may require more meetings than others. In general, the following review process will be used for the LCA.

Steps

1. The County will generate parcel maps for each UGA showing vacant, partially-used, and underutilized parcels as well as critical area buffers overlaid on aerial imagery. Some larger UGAs may need to be presented in multiple maps.
2. The maps, along with tabular parcel data underlying the maps will be sent to each local jurisdiction for review. If appropriate, County staff will meet with city staff to discuss any adjustments to developable designations or critical areas that are necessary. These meetings can also be used to discuss infrastructure deductions, public use deductions, assumed density assumptions, market factor assumptions, and other jurisdiction-specific assumptions described

- [to table of contents](#)
- [previous chapter](#)
- [next chapter](#)
- [endnotes](#)

elsewhere in this methodology. The range of additional issues that can be considered during the local jurisdiction review process includes but is not limited to the following:

- Critical areas not identified through GIS analysis
- Known market interest in development or redevelopment of particular parcels/areas
- Parking and outdoor storage associated with adjacent uses
- Other associated/related uses spanning multiple parcels
- Irregular parcel shapes making development unlikely

3.6 Market Factor Deduction

The market factor is a final deduction from the net developable area to account for lands assumed not to be available for development during the planning period. It is expected that over the 20-year planning period some lands will be kept off the market due to speculative holding, land banking, and personal use, among other reasons.

Steps

1. Summarize acreage in the Developable Land Inventory by zone, by land use (residential and commercial/industrial) and developable land designation (vacant, partially-used, and under-utilized). This acreage should represent developable land after critical areas, infrastructure, and public uses have been deducted.
2. Apply the following deduction factors to the developable acreage by zone:
 - For vacant residential and commercial/industrial zones: 15% market factor
 - For partially-used and under-utilized residential and commercial/industrial zones: 25% market factor
3. As a reference point, the overall average market factor for all developable land should be calculated for each UGA and Countywide (total acres deducted based on market factor percentage / total acres in the Developable Land Inventory after critical areas, infrastructure, and public uses have been deducted).

4. During the local jurisdiction review process, the base market factors may be adjusted to account for local conditions and future plans. If market factors are adjusted, the final overall average market factor for a UGA should not exceed 25%. For certain areas (e.g. commercial/industrial areas in smaller outlying UGAs) market factors may exceed 25% but the jurisdiction must have well documented support for why such a deduction is appropriate.
5. The final acreage totals by zone represent the Net Developable Land Inventory – the land expected to be available to accommodate future population and employment over the planning period.

4.0 DEVELOPMENT DENSITY ASSUMPTIONS

Assumptions about future development density are critical elements in the Land Capacity Analysis because they are needed to convert net developable area (acres) into future population and employment capacity.

4.1 Analysis of Recent Development History (Determine Achieved Densities)

The first step in developing density assumptions is to analyze recent development history to determine the actual densities achieved in different zones and planned land use areas. These achieved densities will serve as reference points and one of the inputs into the determination of assumed future densities in each zone.

The past five years of development activity (both plats and permits) is used to determine actual net achieved densities of development on both residential and commercial/industrial land. Local jurisdictions will provide the development data to County staff. On the land side of the equation, County staff with the assistance of local jurisdictions will calculate the net acreage of parcels housing the recent developments. The net acreage must exclude the same ROWs, critical areas, and public uses excluded from the developable land supply. The final achieved densities will be expressed as dwelling units (DUs) per acre for residential parcels and floor area ratios (FARs) for commercial and industrial parcels.

Steps

1. Cross-reference all plat and permit activity with the Assessors parcel data to select only those parcels that experienced development activity during the five year study period.
2. Using GIS, overlay these parcels with critical area layers and calculate the area constrained by critical areas in each zone.

- [to table of contents](#)
- [previous chapter](#)
- [next chapter](#)
- [endnotes](#)

3. For all plat and permit activity, summarize the total acreage of land by zone dedicated to ROWs, infrastructure, and other public purposes.
4. Subtract the area constrained by critical areas, infrastructure, and public purposes from the gross parcel area in each zone. The resulting acreage is the net area to use in achieved density calculations.
5. Summarize the total number of lots (for single family plats), units (for multifamily residential and mixed-use building permits), and building square footage (for commercial, industrial, and mixed-use permits) for each zone in a jurisdiction.
6. Use the basic calculations listed in Exhibit 2 to calculate achieved density for each development type in each zone in each jurisdiction. Final achieved densities will be expressed in terms of DUs per acre for residential zones and FAR for commercial and industrial zones.

Calculate the percentage of gross parcel area dedicated to ROWs and other infrastructure uses in each zone and each UGA overall. This percentage is used in future land capacity calculations (see Section 3.4)

Exhibit 2: Basic Achieved Density Calculations by Development Type

Development Type	Achieved Density Calculation
Single Family Subdivision Plats	# Lots/ Net Plat Area
Multifamily Building Permits and Plats	# Units/ Net Site Area
Commercial and Industrial Building Permits	Floor Area/ Net Site Area
Mixed Use Building Permits (Residential Portion)	# Units/ Net Residential Portion of Site
Mixed Use Building Permits (Commercial Portion)	Commercial Floor Area/ Net Commercial Portion of Site

Note: For mixed-use buildings, the site area is apportioned between residential and commercial uses based on the share of building square footage dedicated to each use

4.2 Determine Assumed Densities.

For each zone and planned land use designation, jurisdictions will develop assumed densities to be used in the Land Supply Analysis. These assumptions are meant to be reasonable estimates of densities to expect over the long-term planning period. Assumed densities will only be used for the purposes of the LCA and will not be used to guide or influence other County or local land use policy decisions. In determining assumed densities, jurisdictions will consider the following range of inputs: recent achieved densities; County and city land use goals and policies; local knowledge of development plans and pending development; and any other local market or policy conditions that are likely to impact future development densities. The County will work with city staff to ensure that reasonable assumed densities are developed. The determination of assumed densities in each zone and planned land use area in each jurisdiction is expected to be an iterative and collaborative process between the County and cities. The process will be challenging because each jurisdiction will have its own set of issues depending on the complexity of its zoning code, other land use policies, and market conditions. In addition, the theoretical densities allowed in an area must be balanced with potentially very different achieved densities in those same zones. Although establishing one common method for determining assumed densities is not possible, the underlying principle in this process is to develop assumed densities that are reasonable given recent development patterns and expected changes in future densities caused by market and policy factors. A few of the guidelines to assist jurisdictions in determining assumed densities include:

- Using achieved densities as assumed densities if they fit within expected values for particular zones and planned land use areas. Adjustments can be made based on recommendations from local jurisdictions.
- Using a midpoint density between the maximum allowed under zoning and either the minimum allowed or achieved density. This approach may be more appropriate for multifamily zones, which often have a wide range of allowed densities.
- Using selected recent planned developments as models of future development densities in a particular zone.
- Ensuring that incorporated city UGA average assumed densities (over the entire city) remain above accepted thresholds of urban densities (e.g. 4 DUs per acre)
- Ensuring that urban densities increase over current trends.

Additional Considerations – Mixed Use Zones

- [to table of contents](#)
- [previous chapter](#)
- [next chapter](#)
- [endnotes](#)

In addition to the assumed densities assumptions, local jurisdictions will also need to address important assumptions for mixed-use parcels. Mixed-use parcels represent a unique challenge because they include both residential and commercial capacity. The proposed approach to deal with these parcels is to make an assumption about what share of development will be in residential and commercial uses respectively. These assumptions will be provided by local jurisdictions based on recent patterns in mixed-use development within each planning area, local jurisdiction plans, and local knowledge of trends and pending development.

5.0 CONVERT NET DEVELOPABLE AREA INTO NET POPULATION AND EMPLOYMENT CAPACITY

The final step in the land supply analysis is to convert the net developable land inventory (in acres) into population and employment capacity. A series of conversion factors are used to make these calculations including: net assumed densities of future development in each planned land use designation (see Section 4.2), average household size, and non-resident vacancy rates. The final product is an estimate of the number of people and employees that can be accommodated in each UGA on developable land. These estimates will be directly comparable to the forecasted population and employment totals allocated to each UGA over the 20-year planning period.

5.1 Determine Population Capacity

This section describes how capacity to accommodate future population growth is derived from the net developable area in residential zones and the residential portion of mixed-use zones.

Steps

Determine Total Dwelling Units Capacity by Zone

1. Multiply net acres of residential developable land in each zone by the assumed density (DUs/acre) for each zone. The output will be the total dwelling units of capacity available in each zone before accounting for existing development on partially-used and under-utilized parcels.
2. Summarize total existing dwelling units on partially-used and under-utilized parcels by zone. Subtract these units from the totals from the previous step so that existing units are not counted as part of partially-used or under-utilized parcel capacity.
3. Earlier in the process, parcels with pending developments were set aside. These parcels included preliminary or final plats, permits, and binding site plans for developments that have

received preliminary approval but have not been constructed by July 1, 2008. Master planned projects that have not been completely built out but have received approval for a certain number of dwelling units are also included. (see Section 3.1). The estimated capacity in these developments is more accurate than calculated theoretical capacity. Summarize total dwelling units in these pending developments by zone. Add these units to total dwelling units from Step 2. The output will be total dwelling units of capacity available in each zone.

Determine Total Occupied Dwelling Units by Zone

1. Determine occupancy rate assumptions for each UGA city by using 2008 OFM estimates. OFM does not provide reliable occupancy rates for unincorporated areas so 2000 Census data are used to calculate occupancy rates in unincorporated UGAs (e.g. Birch Bay and Columbia Valley). The 2000 Census occupancy rate assumptions are adjusted based on more current ACS estimates on how these rates have changed countywide since 2000. In particular, the occupancy rates in UGAs with large concentrations of seasonal housing will be assessed carefully. If more accurate occupancy rate assumptions are available from a reliable local source, these may be used instead of the OFM and Census values.
2. Multiply the total dwelling units of capacity in each zone by occupancy rate assumptions for each UGA. The output will be total occupied dwelling units in each zone. Determine Total Population Capacity by UGA
3. Determine average household size assumptions for each UGA city by using 2008 OFM estimates. OFM does not provide reliable household size estimates for unincorporated areas so 2000 Census data are used to calculate average household sizes in unincorporated UGAs (e.g. Birch Bay and Columbia Valley). Average household sizes for single family and multifamily households are calculated separately. The 2000 Census average household size assumptions are adjusted based on more current ACS estimates on how these values have changed since 2000. If more accurate household size assumptions are available from a reliable local source, these may be used instead of the OFM and Census values.
4. Aggregate the total dwelling units in each zone into two categories, single family and multifamily. The distinction between single family and multifamily zones is challenging because each jurisdiction may interpret “single family” and “multifamily” differently and have zoning codes that allow different levels of density in each of these categories. To improve consistency

- [to table of contents](#)
- [previous chapter](#)
- [next chapter](#)
- [endnotes](#)

and common understanding regarding land use categories, the following single family/multifamily threshold will be used: all zones allowing more than 7 DUs/acre will be considered multifamily and all those allowing up to 7 DUs/acre will be considered single family.

5. Multiply total occupied dwelling units in the single family and multifamily categories in each zone by average household size assumptions for these categories. The final output will be total population capacity within each UGA.
6. The population capacity in each UGA can be compared to the population allocated to each UGA to determine where excess or insufficient developable land capacity is an issue.

Reverse Conversion Steps

If desired, the reverse conversion from population allocation to net acres of residential land needed can be carried out using the following calculations, which are essentially the reverse of the steps listed above.

Steps

1. Calculate weighted average occupancy rates, assumed densities, and average household sizes for each UGA using the net developable land inventory.
2. Divide the population allocation for each UGA by the weighted average household size value for each UGA. The output will be total future occupied households demanded.
3. Divide the total occupied households demanded by the weighted average occupancy rate for each UGA. The output will be total future dwelling units demanded.
4. Divide total dwelling units demanded by the weighted average assumed density (DUs/acre) for each UGA. The output will be total acres of net residential land demanded over the planning period.

5.2 Determine Employment Capacity

This section describes how capacity to accommodate future employment growth is derived from the net developable area in commercial and industrial zones and the commercial portion of mixed-used zones.

Steps

Determine Total Square Footage Capacity by Zone

1. Multiply net acres of commercial and industrial developable land in each zone by the assumed FAR⁹⁰ for each zone. The output will be the total square footage capacity available in each zone before accounting for existing development on partially-used and under-utilized parcels.
2. Summarize total existing commercial and industrial building square footage on partially-used and under-utilized parcels by zone. Subtract this square footage from the totals from the previous step so that existing buildings are not counted as part of partially-used or under-utilized parcel capacity.
3. Earlier in the process, parcels with pending developments were set aside. These parcels included commercial and industrial permits or binding site plans for developments that have received preliminary approval but have not been constructed by July 1, 2008. Master planned projects that have not been completely built out but have received approval for a certain amount of commercial/industrial square footage are also included. (see Section 3.1). The estimated capacity in these developments is more accurate than calculated theoretical capacity. Summarize total commercial and industrial building square footage in these pending developments by zone. Add this square footage to the totals from Step 2. The output will be total commercial and industrial square footage capacity available in each zone.

Determine Total Occupied Square Footage by Zone

1. Multiply the total square footage capacity in each zone by a 95% occupancy rate assumption. The occupancy rate assumption can be adjusted based on current and accurate data provided by local jurisdictions (e.g. annual real estate market reports). The output will be total occupied commercial and industrial square footage in each zone.

Determine Total Employment Capacity by UGA

2. Aggregate the occupied commercial and industrial square footage capacity by zone into the three categories used in the future employment allocation process: Commercial, Industrial, and Retail. These categories each include specific NAICS-based industries, which are described in greater detail in the Allocating Countywide Forecasts – Proposed Methods memo (see Exhibit 3 in last section of this document).
3. Determine employment density (square footage of floorspace occupied per employee) assumptions for future commercial, retail, and industrial development. The City of Bellingham

- to table of contents
- previous chapter
- next chapter
- endnotes

has conducted a recent employment analysis that includes an assessment of employment density averages within the city. The County will use the Bellingham analysis as a starting point in determining final employment density assumptions, with adjustments to account for jurisdictional differences. Another reference point in determining employment density assumptions is the ECONorthwest 2002 Whatcom County Land Capacity Analysis, which used the following values:

- Industrial: 650 square feet per employee
 - General Commercial: 400 square feet per employee
 - Retail: 600 square feet per employee
- The final employment density assumptions can be adjusted based on local jurisdiction review.
4. Divide the total occupied commercial and industrial square footage in each category by the employment density assumptions. The final output will be total employment capacity within each UGA.
 5. The employment capacity in each UGA can be compared to the employment allocated to each UGA to determine where excess or insufficient developable land capacity is an issue.

Reverse Conversion Steps

If desired, the reverse conversion from employment allocation to net acres of commercial and industrial land needed can be carried out using the following calculations, which are essentially the reverse of the steps listed above.

Steps

1. Calculate weighted average FARs and employment densities for each UGA using the net developable land inventory.
2. Multiply each UGA's employment allocation in each industry category by employment density assumptions. The output will be total future occupied commercial and industrial square footage demanded.

3. Divide the total occupied commercial and industrial square footage demanded by the assumed occupancy rate for each jurisdiction. The output will be total future commercial and industrial square footage demanded.
4. Divide total commercial and industrial square footage demanded by the weighted average FARs for each UGA. The output will be total acres of net commercial and industrial land demanded over the planning period.

Example Buildable Lands Program: Pierce County⁹¹

Similar to the Whatcom County and cities LCA, Pierce County and cities also utilize a LCA to periodically determine if the county and cities are achieving their policies for housing and density, development and redevelopment, and employment.

RCW 36.70A.215 requires certain counties and their cities to adopt a program of review and evaluation to determine whether a county and its cities are achieving urban densities within UGAs by comparing growth and development policies in their plans with actual growth and development. The jurisdictions are to identify and adopt reasonable measures other than adjusting UGA boundaries to increase consistency between policies and actual development. Commerce provides Guidelines for the Buildable Lands Program, Evaluation Reports, and Fact Sheets on its website at:

<http://www.commerce.wa.gov/Services/localgovernment/GrowthManagement/Growth-Management-Planning-Topics/Pages/Buildable-Lands.aspx>

Pierce County began its Buildable Lands Program in 1997. The following jurisdictions participate in the program: Auburn; Bonney Lake; Buckley; Carbonado; DuPont; Eatonville; Edgewood; Fife; Fircrest; Gig Harbor; Lakewood; Milton; Orting; Pacific; Pierce County – Unincorporated Urban Growth Areas; Puyallup; Roy; Ruston; South Prairie; Steilacoom; Sumner; Tacoma; University Place; Wilkeson.

The following summary is reprinted from the Pierce County Buildable Lands Program 2008 Consistency Evaluation, Final Report 1/20/2009:

“Pierce County’s Buildable Lands Program⁹² focuses on evaluating the ability to accommodate planned population and employment growth within the urban growth area for both housing and employment capacity. Through regular review and coordination between jurisdictions, the

- to table of contents
- previous chapter
- next chapter
- endnotes

process aims to encourage consistency between actual development patterns, local comprehensive planning and GMA goals.

Pierce County's September 2002 Buildable Lands Report, its first required report, compiled development data during the five years from 1996 through 2000. The 2002 report was the first countywide document that contained detailed information about development actually occurring in the field and used a consistent methodology in analyzing whether or not the cities, towns and unincorporated urban areas within Pierce County have sufficient lands to accommodate the planned growth. While this report details the densities achieved by jurisdictions during the five year period and identifies the difference between future housing needs and estimated housing capacity, it does not specifically identify jurisdictions that should adopt reasonable measures to rectify observed inconsistencies between observed and assumed densities or between allocated population and existing land capacity.

In 2004, Pierce County issued the Pierce County Buildable Lands Program Consistency Evaluation Report to provide guidance to local jurisdictions in moving toward compliance with the Buildable Lands requirement. This report further evaluated the data documented in the 2002 Report and identified specific jurisdictions that may need to adopt reasonable measures to achieve consistency between planned assumptions and observed trends. A detailed review of reasonable measures suggested by the Washington State Department of Community, Trade, and Economic Development (CTED)⁹³ gives the jurisdictions a better understanding of what tools may help them encourage development that would be more consistent with community goals. Buildable Lands Report: A Monitoring and Evaluation Analysis of Urban Growth and Development Capacity for Pierce County and its Cities and Towns, September 2007 is the second Buildable Lands Report published by Pierce County. It mirrors the first by providing comprehensive data for each jurisdiction related to observed densities and housing/employment capacity, but offers limited analysis relating to whether or not inconsistencies that would prompt reasonable measures were present.

This document is the 2008 Buildable Lands Program Consistency Evaluation Report that evaluates the information gathered from Pierce County's 23 cities and towns as well as the unincorporated Urban Growth Area for period from 2001 to 2005. This report considers if development is likely to meet both a jurisdiction's density assumptions for each zone and the four dwelling units per acre average density for new development established through the Countywide Planning Policies. In addition, this report highlights the status of land available for development to determine if sufficient land exists to accommodate long-term growth. It is important to note that the density assumptions and growth capacity are tightly interwoven. If density

assumptions are not met, the capacity for growth will be lower. Similarly, if a jurisdiction chooses to reduce its densities, growth capacity will be constrained.

This document does not review other potential constraints that jurisdictions may face in achieving their goals or accommodating growth. Therefore, while a jurisdiction may have limited infrastructure capacity, this has not been discussed except in the context of one of the measured inconsistencies, if an inconsistency exists. In addition, data from the 2007 Buildable Lands Report identified some jurisdictions that were seeing limited growth. This report did not evaluate if the current levels of growth were sufficient to accommodate anticipated long-term growth. Buildable lands legislation does not require a review of the amount of development, but rather whether or not new development is meeting the jurisdiction's goals, as discussed above.

While the development data presented in the 2007 Report provides the foundation for the consistency evaluation, PMC and SPS are aware that rarely do the numbers alone tell the entire story. For this reason, the work included obtaining feedback through workshops, questionnaires and individual discussions with the jurisdictions to better assess the conditions surrounding the data.

As required by the Buildable Lands legislation, those jurisdictions that are not consistent with either the density assumptions or capacity allocations must consider reasonable measures to achieve consistency. With the accurate determination of consistency as the final goal, the PMC and SPS team recognized that a sound methodology and review process were critically needed. This report applies that common methodology; summarizes the results; and identifies which governments are consistent with assumptions, why they may not be, and what can be done to remedy the situation.”

The Pierce County Buildable Lands Program 2007 report contains the County and cities' Land Capacity Analysis methodology and results for each jurisdiction. Pierce County utilizes a Land Capacity Analysis similar to Whatcom County and cities to evaluate both the sufficiency of lands in Pierce County and to implement its Buildable Lands Program for achieving greater consistency and efficiencies between adopted policies guiding growth and development and actual development occurring in Pierce County and cities.

The following land capacity methodology is reprinted from the Pierce County Buildable Lands Program 2007 Report⁹⁴:

RESIDENTIAL AND COMMERCIAL CAPACITY ANALYSIS

- [to table of contents](#)
- [previous chapter](#)
- [next chapter](#)
- [endnotes](#)

Methodology

The methodology used to calculate the residential and commercial/industrial capacity is the same as utilized in the 2002 analysis. Although the same methodology is utilized, the assumptions incorporated for each jurisdiction may have been modified to reflect observed trends in addition to unique circumstances or geographical limitations for individual jurisdictions.

The methodology employed for the analysis includes various factors and assumptions. Each component directly influences the estimated capacity and needs' statistics. This reflects a conservative approach; therefore the reported estimates are not maximum capacity figures.

The analysis is based on the total gross acreage associated with each of the four buildable land categories (vacant, underdeveloped, redevelopable multi-family, and redevelopable commercial/industrial) by zoning district. In addition, parcels within master planned communities are deducted from the buildable lands inventory and replaced in the analyses with the remaining housing unit or employment build-out number as documented in an approved developer agreement or other such approval.

The estimated residential capacity is generated through acreage deductions to account for factors identified below and the application of an average residential density. As mentioned previously, the parcels associated with vacant lands have been categorized as either vacant or vacant (single unit). If the parcel is a vacant (single unit) parcel, the parcel acreage is deducted from the gross acreage and incorporated in the analysis as one dwelling unit.

Residential housing units represent the estimated residential needs. The total needed units are a derivative of the 2022 population allocation and an estimate of persons per household (pphh). In most instances the pphh assumptions for each city and town are a smaller average size as reported through the 2000 census information to reflect the historical trend of decreasing household sizes. The 2006 housing counts referenced in Table 7 represents OFM's April 1, 2006 estimate.

The estimated commercial/industrial capacity is generated through the application of an average employee per gross acre. This simplified approach results from the intricacies associated with the employment capacity. As an example, an existing vacant parcel may be initially developed as a warehouse with a single shift. As land value or demand increases, the same warehouse may add a second shift or be converted to a higher intensity employment center. In either instance, additional employment is accommodated without the consumption of vacant or redevelopable lands.

General Factors/Assumptions

The assumptions incorporated into each jurisdiction's residential and employment capacity analysis is detailed in Table 4 and Table 5. In addition, Table 4 provides a summary of development characteristics derived from the data collected by each jurisdiction. Table 5 details the criteria applied in inventorying vacant, vacant (single-unit), underdeveloped, and redevelopable commercial/industrial properties. The assumptions were determined by staff representing each jurisdiction.

Mixed Use Zoning

Mixed use zoning permits residential and commercial activity on the same parcel or on separate parcels within the same zoning classification. To account for this mixture of activity in both the residential and commercial/industrial capacity analyses, a ratio is incorporated to reflect future residential/commercial land consumption. As a consequence, the gross acreage identified under each mixed use zoning classification represents the acreage assumed as either residential or commercial, not the total gross acreage categorized as vacant, vacant (single-unit), underdeveloped, or redevelopable. In some instances where a vertical mixed use is anticipated, 100 percent of the land area is assumed as both residential and commercial. This recognizes buildings where the first floor is commercial and the additional stories are residential.

Master Planned Communities

Master Planned Communities (MPC) are unique development proposals. Through local development regulations MPCs may deviate from prescribed bulk/dimension provisions and, in some instances, construct a mixture of residential and non-residential developments. The total number of dwelling units and commercial square footage is documented in local development agreements. To acknowledge these agreements, the detailed deductions/calculations are not applied to generate a capacity statistic. Instead, the total approved units/square footage not constructed by the end of December 2005 is identified as the total capacity for the associated properties on Table 8 and Table 9.

Displaced Units

The buildable lands analysis incorporates a category of buildable lands that displaces existing residential homes. In the analysis, existing housing units located on underdeveloped parcels and redevelopable multi-family parcels are identified as displaced units at the bottom of Table 6 and added to the housing unit needs on Table 7. In this approach, all underdeveloped and redevelopable multi-family land is calculated as vacant land. As a consequence, the existing units that will be displaced need to be accounted for.

Market Availability (unavailable for development)

Although individual properties met the criteria for vacant, underdeveloped, and redevelopable lands, property owners may not want to sell or further develop the land in the next twenty years. There are various reasons for this to occur, including personal use, economic investment, and sentimental relationship with their surrounding environment. To account for the market availability, a specific percent of the net acreage is deducted from the inventory on Table 8 and Table 11. A higher percentage is deducted for properties categorized as either underdeveloped or redevelopable. This correlates with a higher uncertainty for the redevelopment of existing developed properties.

Future Capital Facilities

The acreage associated with anticipated/planned public capital facilities is deducted from the total gross residential and commercial/industrial acreage. Various governmental districts/agencies were contacted to identify future public capital facilities. If a specific facility was associated with a specific parcel(s), the associated acreage is deducted from a specific zoning category. If the identified capital facility specifies only acreage, an equivalent deduction that totals the specified need is applied to each residential zoning category. In some instances, a local jurisdiction chooses to incorporate a certain percentage of future land disregarding the documented needs as inventoried.

Residential Factors/Assumptions

Plat Deductions

Individual jurisdictions apply different methods to calculate the maximum number of housing units permitted within a project. The various methods can be categorized into two approaches; minimum lot size and density. The plat deductions incorporated in Table 6 reflect the type of approach the respective jurisdiction implements. Plat deductions are from the total adjusted net acreage. In some instances there may not be adequate acreage to meet the assumption figures. In such cases, the capacity will be identified as zero.

Minimum lot size approach - the acreage associated with non-residential activity, i.e., roads, stormwater, environmental constraints, parks, are not included in calculation of the maximum number of residential units and as a consequence, are deducted.

Density approach - jurisdictions contrast in the implementation of the density approach. While some calculate units with a project's gross acreage, others employ a net acreage. Furthermore, the components that are subtracted from the gross acreage to calculate the net acreage fluctuate between jurisdictions.

Vacant (single-unit)

The vacant (single-unit) acreage represents existing vacant properties that will not be further subdivided in the next twenty years, i.e., individual building lots. The parcel size associated with net vacant parcel depends upon density/lot limitations, which varies for each jurisdiction. The transformation from acreage to dwelling unit occurs at the bottom of Table 6. The number of dwelling units listed represents the number of parcels associated with the net vacant acreage.

Person per Household

A person per household (pphh) figure is assumed in Table 7 to correlate the population growth associated with the 2022 population allocations to needed housing units. The pphh figure was derived from the 2000 U.S. Census, and in most cases, reduced by 5.5 percent to reflect the historic decrease in household sizes. Data availability limited the statistic to an average for both single family and multi-family units.

Residential Density

The net buildable acreage calculated in Table 6 is converted to housing unit capacity in Table 10 through the application of assumed density. Table 8 identifies the density applied to each zoning district. Individual jurisdictions established the density assumptions with recognition of past trends and recent regulatory modifications.

Non-Residential Uses

Zoning codes permit various types of non-residential development within residential districts, such as churches and day-care centers. To account for future non-residential development a percentage of the net residential acreage is deducted from the available buildable lands. The specific percentage differs between each jurisdiction.

Commercial Factors/Assumptions

Commercial/Industrial Intensity

The buildable acreage calculated in Table 9 is converted to employee capacity in Table 11 through the application of assumed gross employees per acre.

Displaced Employees

The redevelopable land category may include existing businesses and employees that if redeveloped as another business would be displaced. As a consequence, the employment growth figure is increased to

account for the eliminated jobs. To calculate the displaced employees, ESD employment data was overlaid on properties inventoried as redevelopable commercial/industrial land.

In addition to the LCA methodologies provided herein by Whatcom and Pierce Counties and cities, many other fully planning jurisdictions in Washington State have refined their LCA and Buildable Lands Program methodologies to more accurately determine if they are achieving policies in their comprehensive plans for growth and development patterns that can be supported by adequate and cost effective urban services.

As fully planning jurisdictions near their next review and update of comprehensive plans, UGAs, development regulations, and Buildable Lands Program reports, consistent with the requirements and timelines in RCW 36.70A.110, RCW 36.70A.130, and RCW 36.70A.215, they will rely heavily upon their local Land Capacity Analysis to determine the adequacy of lands and the effectiveness of their policies to guide growth and development.

In the next chapter we will examine how addressing a variety of housing and housing market conditions, together with transportation opportunities, can maximize efficiencies in UGAs.

Other Examples Subarea Planning Tools

Jurisdiction	Subarea Plan
Whatcom County	Land Capacity Analysis – Detailed Methodology
Pierce County	Buildable Lands 2008 Consistency Evaluation – Final Report
Douglas County	Douglas County UGA Analysis (Select UGA analysis and text from left hand website menu)
Spokane County	Urban Growth Area Update
Thurston County	2007 Buildable Lands Report
Kin County	2007 Buildable Lands Report

- to table of contents
- previous chapter
- next chapter
- endnotes

Endnotes

⁷⁵ Also referred to as a Land Quantity Analysis

⁷⁶ RCW 36.70A.020(4) and RCW 36.70A.070(2)

⁷⁷ <http://www.commerce.wa.gov/Services/localgovernment/GrowthManagement/Growth-Management-Planning-Topics/Pages/Buildable-Lands.aspx>

⁷⁸ RCW 36.70A.130

⁷⁹ Issues in Designating Urban Growth Areas, Part 1 “Providing Adequate Urban Area Land Supply.”

⁸⁰ E.g. Clark County and cities consider property to be vacant with structures valued at \$13,000 or less.

⁸¹ RCW 36.70A.215, WAC 365-196-315 *Buildable Lands Review and Evaluation*

⁸² RCW 36.70A.130(3)(a)(b)

⁸³ RCW 36.70A.030(19)

⁸⁴ <http://apps.leg.wa.gov/WAC/default.aspx?cite=365-196-325>

⁸⁵ <http://apps.leg.wa.gov/WAC/default.aspx?cite=365-196-315>

⁸⁶ <http://apps.leg.wa.gov/WAC/default.aspx?cite=365-196-315>

⁸⁷ (Whatcom County, 2009)

⁸⁸ <http://www.co.whatcom.wa.us/pds/2031/projects/gmcc/index.jsp> Growth Management Coordinating Council, UGA Review Policy paper

⁸⁹ <http://www.co.whatcom.wa.us/pds/2031/uga.jsp> Attachment 2 - Detailed Land Capacity Methodology. Whatcom County data sources omitted from this document (See Whatcom County website).

⁹⁰ Floor Area Ratio

⁹¹ (Pierce County, 2009)

⁹² <http://www.co.pierce.wa.us/pc/abtus/ourorg/pals/whatwedo/buildablelands.htm> Pierce County Buildable Lands Program 2008 Consistency Evaluation, Final Report 1/20/2009

⁹³ Department of Commerce

⁹⁴ <http://www.co.pierce.wa.us/pc/abtus/ourorg/pals/whatwedo/buildablelands.htm> 2007 Pierce County
Buildable Lands Report

- to table of contents
- previous chapter
- next chapter
- endnotes

Chapter 6

Housing Market Conditions – Healthy Transportation Opportunities in Urban Growth Areas

The Housing Element of a comprehensive plan speaks to how a county or city will respond to anticipated growth by providing a variety of housing types together with a variety of densities to create affordable housing opportunities for all economic segments of a community. The housing element must also ensure the vitality of established residential neighborhoods. A housing needs analysis⁹⁵ can further define the housing density, mix of uses, and whether there are adequate housing provisions for all economic segments of the local community.

The housing needs analysis should parse the overall population projection into the number and types of housing units required to meet each economic segment of the community. The calculation for each economic segment can then be measured against the residential land area, together with the densities permitted, to determine if there is adequate residential land designated. Jurisdictions generally have several residential designations and corresponding densities to meet a wide range of housing needs.

The housing policies of a comprehensive plan together with the development regulations that implement those policies can influence the development capacity of Urban Growth Areas (UGAs) over the 20-year planning horizon.

Effective housing policies that are consistent with existing and emerging markets can also enable a variety of transportation modes such as transit, light rail, bike lanes, and pedestrian pathways. These alternative transportation modes, in turn, add even more value by helping to lower greenhouse gas emissions⁹⁶ and improve community health.

Policies that promote a mix of housing types for all income levels, combined with flexible regulations for density, innovation and design, infill, and redevelopment, can help maximize the use of available urban lands as well as generate revenues to pay for needed urban services and transportation systems.

“Innovation does not necessarily suggest development that is radical or unusual. The goal is not to provide “adventurous” housing: the vast majority of people are very conservative when they invest in homes or income properties. Rather, the innovation comes from efficient and creative use of spaces, features and amenities, both within the overall development and the individual homes. Innovative housing seeks the right size for each market segment, offering just the things it needs. The result is housing that costs less, uses less land, has lower impacts on the environment, and often provides opportunities for social interaction.”⁹⁷

GMA Statutes

The Growth Management Act⁹⁸ (GMA) contains 14⁹⁹ goals. One of the more challenging of these 14 goals for counties and cities to meet is the Housing goal:

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.¹⁰⁰

More specifically, the GMA requires comprehensive plans to include:

- [to table of contents](#)
- [previous chapter](#)
- [next chapter](#)
- [endnotes](#)

A housing element ensuring the vitality and character of established residential neighborhoods that: (a) Includes an inventory and analysis of existing and projected housing needs that identifies the number of housing units necessary to manage projected growth; (b) includes a statement of goals, policies, objectives, and mandatory provisions 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.

RCW 36.70A.090 enables local communities to adopt innovative land use management techniques that can include: density bonuses; cluster housing; planned unit developments; transfer of development rights. In addition, RCW 36.70A.400 and RCW 43.63A.215 provide local communities the ability to utilize accessory apartments where appropriate.

In 2006, the Legislature addressed the continued lack of affordable housing in the State of Washington with adoption of RCW 36.70A.540¹⁰¹, creating an incentive program to increase the availability of low-income housing for renter and owner-occupied units, consistent with local needs and adopted comprehensive plans. Incentives for UGAs may include: density bonuses; additional height and bulk allowances; fee waivers or exemptions; parking reductions; expedited permitting; and other types of incentives to increase affordable housing units.

These statutes give counties and cities the legislative authority to adopt policies and standards to ensure adequate and affordable housing is planned for their UGAs.

Helpful Guidance from the Washington Administrative Code

Commerce updated the Washington Administrative Code (WAC) for the GMA in 2010 with new sections added to provide guidance on housing. The following guidelines describe how housing types and varieties can be used to manage growth and provide affordable housing within UGAs:

WAC 365-196-410 Housing element¹⁰²

This section of the WAC provides direction for counties and cities in developing housing elements in their comprehensive plans to meet the requirements of RCW 36.70A.070(2) for: inventory and analysis of existing housing and future needs; goals, policies, and preservation of housing; identification and designation of sufficient land for multiple housing types; and provisions for housing affordability for all economic segments of a community.

To meet the requirement of the statute, this section of the WAC recommends that the housing element contain goals and policies that can be implemented in development regulations for affordable housing, preservation of neighborhood character, provision of a variety of housing types and densities, and methods for monitoring housing changes. The housing element must also contain a housing inventory and needs analysis to determine the current availability of affordable housing for all economic segments of the community, and what is needed to serve these segments, as well as total projected future population growth. In estimating affordability, plans should consider the extent of housing which can be rented or purchased for 30 percent or less of household income, for various income ranges as defined by local policies or U.S. Housing and Urban Development thresholds.

The WAC further recommends that the housing element include an implementation plan and a description of adjustments or revisions a jurisdiction may consider and act upon relative to housing needs.

Growth Management Hearings Board Cases

The following selected case summaries are reprinted from Growth Management Hearings Board digests. These cases address how jurisdictions plan for housing needs and housing affordability. Full texts of cases may be obtained from the Hearings Board website at www.gmhb.wa.gov

As society and technology have changed over time, so too have communities and residential neighborhoods changed. This has been reflected in changes in statute and case law at both the federal and state levels. 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

- to table of contents
- previous chapter
- next chapter
- endnotes

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 Alliance I, FDO, 7/25/95, at 5, footnote omitted]

Growth is more than simply a quantitative increase in the numbers of people living in a community and the addition of “more of the same” to the built environment. Rather, it encompasses the related and important dynamic of change. Because the characteristics of our population have changed with regard to age, ethnicity, culture, economic, physical and mental circumstances, household size and makeup, the GMA requires that housing policies and residential land use regulations must follow suit. This transformation in our society must be reflected in the plans and implementing measures adopted to manage growth and change. [Children’s I, 95-3-0011, FDO, at 9.]

This planning goal [Goal 4] uses the verbs "encourage" and "promote" which are permissive verbs, and thus this goal does not constitute an independent substantive requirement in isolation from a specific GMA requirement ... Goal 4 must be considered together with the affirmative requirements for the Comp Plan Housing Element set forth in RCW 36.70A.070(2). Ninth Street Mobile Home Park v. City of Wenatchee, EWGMHB Case No. 07-1-0008, FDO at 6 (March 16, 2009).

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.]

RCW 36.70A.400 states that any local government that is planning under the Housing Policy Act shall comply with RCW 43.63A.215(3). The Board finds that RCW 43.63A.215, when read as a whole, requires local governments to adopt development regulations, zoning regulations or official controls that provide for accessory dwelling units in areas zoned for single-family residential use by Dec. 31, 1994. Coalition of Responsible Disabled v. City of Spokane, EWGMHB Case No. 95-1-0001, Dispositive and FDO, at 2 (June 6, 1995).

Urban density goals and requirements of the GMA relate primarily to anti-sprawl and compact development. They do not, in and of themselves, address affordable housing goals and requirements. *Achen v. Clark County* 95-2-0067 (RO 12-6-95) [The County's CPP, allowing an individual UGA to be potentially expanded to adjacent land for an affordable housing crisis did not comply with the Act – RCW 36.70A.215. (Note: A CPP, allowing an individual UGA to be potentially expanded for additional residential land is permissible if a need for additional residential land is demonstrated in a land capacity and reasonable measures have been taken. The challenged CPP bypassed .215's reasonable measures requirement.) The Board also commented that a land capacity analysis for residential land is off point in relation to a potential expansion of a UGA pursuant to an "affordable housing crisis," which is the basis for this potential UGA expansion.] Whether the existing and projected housing stock is affordable falls within the parameters of RCW 36.70A.070(2) – the Housing Element. A GMA Plan's Housing Element is required to identify sufficient land for housing, including government-assisted housing, housing for low-income families, manufactured housing, multifamily housing, and group homes and foster care facilities. RCW 36.70A.070(2)(c). Also the Housing Element requires jurisdictions have adequate provision for existing and projected housing needs for all economic segments of the community. RCW 36.70A.070(2)(d). Therefore, reliance upon just a land capacity analysis without supporting documentation in the County's Housing Element would be inadequate to implement [a UGA expansion pursuant to this CPP. The Board found this CPP noncompliant.] [CTED, 03-3-0017, FDO, at 35-36.]

Higher density single family and multifamily housing (apartments, cottage housing, condominiums and townhouses, etc.) adds variety to housing alternatives within urban areas to help make housing affordable for all segments of the population. [Goal 4 and RCW 36.70A.070(4)]. [Kaleas, 05-3-0007c, FDO, at 14]

RCW 36.70A.540, enacted in 2006, sets out the requirements for housing incentive programs which cities or counties may adopt as development regulations in order to meet their affordable housing goals. . . Incentive programs may include density bonuses, height and bulk bonuses, fee waivers, parking reductions, expedited permitting, and mixed use projects. [Futurewise V, 07-3-0014, FDO, at 5.]

- [to table of contents](#)
- [previous chapter](#)
- [next chapter](#)
- [endnotes](#)

Housing Element Examples

Example Housing Element: City of Bremerton

The City of Bremerton's Housing Element is built upon the following vision:

"Bremerton ensures quality homes and cohesive neighborhoods that empower its citizens. Coordinated city services and programs emphasize quality homes, home ownership, residential safety, and appropriate property maintenance. The City fosters the creation and enhancement of cohesive neighborhoods through infill and rehabilitation projects designed with a community orientation. New development, located at strategic locations that capture local amenities and complement rising land values, support diverse lifestyles and a broader, more innovative choice of housing types. Empowered citizens work with the city to protect neighborhood stability, residential compatibility, and an increased sense of community identity and pride."

Bremerton's Housing Element focuses on shelter as the most basic function of community living for the local population. The community acknowledges deterioration of housing conditions and is responding by advocating for better protected and cohesive neighborhoods with identifiable features that encourage higher homeownership rates.

Bremerton's Housing Element also recognizes the need for housing assistance in the community. The City's housing and income analysis shows that a majority of current residents in the City are considered low income and unable to qualify for mortgages or fully maintain homeownership costs. The City's Housing Element suggests creative and incremental strategies to serve the existing population, combined with necessary redevelopment opportunities to help bring new growth and a healthier residential mix to the City. Bremerton's Housing Element is organized into the following four main sections:

1. An examination of current housing conditions (see Housing Appendix)
2. A projection of expected future housing needs (see Housing Appendix)
3. The community's goal and policy direction for responding to the those conditions and needs
4. An overview of implementation strategies set forth by the goals and policies

Bremerton's Housing Element provides not only the goals and policies to achieve its vision, but a strategic implementation plan to fund facilities and services for housing. The City's Housing Element policies also supports home ownership, diverse housing choices, cohesive neighborhoods, low income services, support for special needs citizens, a range of affordable housing types, and policies to enhance economic development.

The City's Housing goals and policies were developed by citizens as well as public officials in response to the challenges identified in the Housing Element and the Housing Appendix of Bremerton's comprehensive plan. The housing goals and related policies are organized into the following five main areas:

- Housing quality
- New housing development
- Affordable housing
- Cohesive neighborhoods
- Housing planning and coordination

The following selection of Bremerton Housing goals and policies for new housing development provides an example of how the City addresses each of the five main areas listed above in its Housing Element and Housing Appendix:

H3 Provide a variety of housing types and densities to meet changing needs of Bremerton residents

H3A Promote private and public efforts to provide adequate capital for private and public new housing projects at competitive or favorable costs.

Support a Letter of Credit program to expedite housing project start-ups

H3B Support the private sector's efforts to meet changing housing demands and special housing needs.

H3C Stimulate the production of new housing for all incomes, ages, and family types.

H3D Encourage the provision of adequate housing to meet the needs of short-term residents, particularly for those in the lower income categories.

- [to table of contents](#)
- [previous chapter](#)
- [next chapter](#)
- [endnotes](#)

H3E Promote housing opportunities that respond to the special needs of students, the military, households headed by females, the elderly, and the handicapped.

H3F Encourage the development of a full range of housing options for seniors in proximity to services and amenities.

- ✓ Consider allowing retirement housing complexes in all residential zones subject to development standards ensuring compatibility with surrounding neighborhoods
- ✓ Encourage programs which allow seniors to remain in their homes as long as possible (e.g. home maintenance and repair, home health care, reverse mortgage programs, meal programs)

H3G Provide for integration of special needs housing within the community. Allow residential care facilities, including foster care facilities, in all residential zones, provided that such facilities must comply with development standards that will assure compatibility with the surrounding neighborhood

H3H Accommodate creative housing options, such as artist's lofts, especially in mixed use areas and rehabilitated structures.

H3I Support efforts to provide emergency and group housing.

H4 Provide housing in mixed-use centers for a variety of incomes, age groups, and household types

H4A Target the use of affordable housing tax credits to Centers.

Example Housing Element: King County

The King County Comprehensive Plan provides a commendable framework of goals and policies to guide housing availability and affordability for King County residents, consistent with the GMA. King County provides housing affordability incentives consistent with RCW 36.70A.540 through its Housing & Community Development (HCD) Program. The HCD administers several affordable housing programs, such as: a credit enhancement program; surplus property program; road and school fee exemption programs; density bonus program; covenants/resale restrictions; income eligibility for benefit units; property specifications; and a review and approval process.

Together with its direct efforts, the County works with numerous public, private, and non-profit entities to promote housing development and affordability. King County partners with most of its cities through the Community Development Block Grant (CDBG) and HOME Consortiums, to allocate and administer affordable housing development funds. In addition, the County participates with all cities in the Regional Affordable Housing Program (RAHP) and the Growth Management Planning Council (GMPC) to address housing affordability.

The County's [Comprehensive Plan Technical Appendix B](#) is an assessment of the local housing stock, demographic data, and its ability to serve the housing needs of County residents now and in the future. This analysis provides the basis for goals and policies in the Housing Section of the Urban Communities Chapter of the King County Comprehensive Plan.

King County Comprehensive Plan Urban Communities Chapter - Housin

Adequate choices and opportunities are essential to fully address the spectrum of housing needs for all King County residents. A basic goal of the Washington State Growth Management Act (GMA) is to encourage affordable housing. Likewise, the King County Comprehensive plan promotes affordable housing for all county residents by supporting adequate funding, zoning, and regional cooperation to create new and diverse housing choices in communities throughout the county.

Most housing is financed by and developed in the private sector. The ability of the private sector to develop affordable housing is affected by a wide range of market forces. Local government actions such as land-use policies, development regulations and infrastructure finance also have a significant impact on housing affordability.

Public funding and incentive programs are essential to address housing needs of lower-income county residents, including people with special needs, such as the elderly and people with disabilities. The policies in this chapter address low-cost housing development, preservation and assistance programs needed to ensure safe and adequate housing for lower-income and special needs residents.

In addition, the King County Consortium represents unincorporated areas and most county cities outside of Seattle. This consortium prepares a Consolidated Housing and Community Development Plan which outlines the needs, resources and housing goals to be achieved. An annual action plan details specific housing and community development objectives.”

- [to table of contents](#)
- [previous chapter](#)
- [next chapter](#)
- [endnotes](#)

King County Housing policies direct many public and private objectives to ensure a variety of housing choices and a full range of affordable housing will be available to residents. The following housing priorities are supported by King County housing policies as adopted in their Comprehensive Plan Chapter 2 - Urban Communities¹⁰³.

- Housing Choice and Opportunity Throughout King County
 1. Range of Housing Choices
 2. Ensuring and Expanding Affordable Housing Resources
- Affordable Housing Development
 1. Development Incentives for Affordable Housing

Housing Development Subsidies

- Preservation of Existing Affordable Housing
- Access to Housing
- Reducing Development Costs
- New Housing Models
- Direct Assistance to Households
 1. Homeowner Assistance
 2. Renter Assistance and Homeless Prevention
- Balancing Jobs and Housing

As the population of the Puget Sound region grows, King County is expected to remain the major employment center of the region. As job growth occurs, the workers for these jobs must be accommodated with adequate opportunities for housing. If a balance of job growth

and housing availability is not achieved, these workers will need to live longer distances away from their jobs, thus increasing pressures upon transportation systems.

The complete text of King County housing policies for the above list of housing priorities is available on the County's website.

Housing Market Conditions

Housing demographics and market conditions need to be considered when planning for UGAs. Adding more low density residential land to an UGA with an over-supply of housing in a sluggish market can make it more difficult to stimulate innovative housing types to maximize use of urban lands and pay for urban services.

Numerous sources of current housing data for counties and cities in Washington are available to assist jurisdictions to determine their housing inventory and characterize housing market conditions as they plan for UGAs. The State Office of Financial Management (OFM) provides housing inventories by unit type for jurisdictions, such as the following example for King County.

- [to table of contents](#)
- [previous chapter](#)
- [next chapter](#)
- [endnotes](#)

Table 6-1 King County Housing Inventory (Abridged)

Municipality	Total	1 Unit	2+ Units	MH/Spec
King	845,265	489,126	336,623	19,516
Unincorporated	124,624	101,787	16,238	6,599
Incorporated	720,641	387,339	320,385	12,917
Algona	1,007	816	41	150
Auburn (pt)	24,253	13,080	8,379	2,794
Beaux Arts Village	128	128	0	0
Bellevue	56,262	30,559	25,634	69
Black Diamond	1,620	1,335	43	242
Bothell (pt)	7,625	3,432	3,352	841
Burien	14,002	8,381	5,550	71
Carnation	659	582	63	14
Clyde Hill	1,071	1,067	4	0
Covington	5,920	5,646	244	30
Des Moines	12,000	7,133	4,457	410

Source: King County

Note: Historical housing unit data have been corrected as more accurate data became available.

Together with housing demographic data provided by OFM as shown above, and U.S. Census¹⁰⁴ housing data, the Washington Center for Real Estate (WCRE)¹⁰⁵ generates quarterly information on housing markets for Washington State and each county. Topics covered include: Housing Re-sales; Home Prices; Building Permits; Housing Affordability; and Listings. The following snapshot tables from WCRE depict data on these topics for counties in the state. The Central Puget Sound Real Estate Research Committee produces a detailed report twice a year that includes; single family sales activity, building activity, economic topics (interest rates, employment, and business conditions), demographic information, and rents and vacancies for apartments, office buildings, industrial properties and hotels. The report covers King, Pierce, Snohomish, and Kitsap counties. Similar reports¹⁰⁶ are produced by the WCRE for the Spokane – Kootenai Counties region, Whatcom County, and Thurston County.

Comprehensive plan policies and development regulations, balanced with housing demographic and market data, can create opportunities for a variety housing types in UGAs that maximize land use and meet the demands for urban services and affordable housing. This balance between policies and market conditions also increases the likelihood of having healthy communities that can support multimodal transportation systems with a variety of transportation modes such as transit, light rail, bike lanes, and pedestrian pathways.

Transportation Opportunities

An inextricable link exists between planning for land use, housing, and transportation in order to achieve not only GMA's goals, but the goals and policies local communities have set for themselves in their comprehensive plans to realize healthy – compact urban areas where people want to live and use clean-low energy travel modes to work. GMA's third goal¹⁰⁷ expresses the following for transportation:

Encourage efficient multimodal transportation systems that are based on regional priorities and coordinated with county and city comprehensive plans.

The GMA provides additional guidance to counties and cities to meet this goal by requiring a Transportation Element in their comprehensive plans¹⁰⁸ to:

- address land use assumptions in estimating travel;

- to table of contents
- previous chapter
- next chapter
- endnotes

- estimate traffic impacts to state-owned facilities and plans to address impacts of local land use decisions;
- develop an inventory of needed facilities and services;
- set level of service standards and monitor local arterials and transit routes as well as local state owned facilities;
- create an action plan to raise facilities up to established levels of service;
- provide a 10-year traffic forecast based on the land use plan with future transportation needs;
- identify state-owned future transportation needs;
- show a fiscal analysis of funding capabilities and resources with a multi-year financing plan;
- document a plan for funding shortfalls;
- demonstrate inter-governmental coordination to assess transportation and land use impacts on adjacent jurisdictions;
- show demand management strategies;
- plan for pedestrian and bicycle facilities;
- adopt a concurrency ordinance;
- demonstrate consistency between local county or city 6-year programs and public transportation systems, and the 10-year investment program required for the state.

Multimodal transportation opportunities were further authorized by the Legislature in 2005 with adoption of RCW 36.70A.108, which enables fully planning jurisdictions to adopt transportation improvements or strategies concurrent with development, including measures that implement or evaluate:

(a) Multiple modes of transportation with peak and nonpeak hour capacity performance standards for locally owned transportation facilities; and

(b) Modal performance standards meeting the peak and nonpeak hour capacity performance standards.

Numerous studies¹⁰⁹ have shown that people will drive less and use healthy modes for transportation when they live closer to work and recreational opportunities. Consistency between the land use element, the housing element, and the transportation element in comprehensive plans can help create walkable and transit friendly communities with a vibrant mix of housing and businesses. This type of compact development¹¹⁰ also translates into lower infrastructure costs, lower greenhouse gas emissions, and overall lower energy costs. As an added bonus, this type of development maximizes the capacity of land in UGAs and enhances the financial resources of local jurisdictions to pay the cost of providing urban services.

Commerce's new [Transportation Guidebook](#) provides in-depth technical assistance to local jurisdictions for GMA's transportation requirements as well as helping communities evaluate local options to implement the transportation element of their comprehensive plans. This new Transportation Guidebook provides examples of local multimodal transportation systems that are integrated with land use and housing plans. The Guidebook also provides helpful links to national transportation resources.

The next chapter of the UGA Guidebook will examine: the procedural process for review and update of UGAs; a scope-of-work with the many components and moving parts that make up a work program for updating an UGA; a public participation program to ensure the community is part of the UGA update discussion; and an integrated SEPA analysis that provides measurable impacts and potential mitigation on the built and natural environment when reviewing and updating UGAs.

Other Innovative Housing and Transportation Resources

City of Spokane	Downtown Spokane Plan
City of Bellingham	Urban Village Plans
City of Seattle	Urban Village Element
City of Liberty Lake	Urban Design and Community Character

- [to table of contents](#)
- [previous chapter](#)
- [next chapter](#)
- [endnotes](#)

City of Walla Walla	Urban Design Framework
City of Olympia	Land Use and Urban Design
City of Ellensburg	Non-motorized Transportation Plan
City of Wenatchee	Housing Element

Endnotes

⁹⁵ WAC 365-196-410 Housing Element

⁹⁶ Washington State Energy Strategy, 2012. RCW 43.21F.010(4)(c)

⁹⁷ The Right Size Home, Housing Innovation in Washington, 2005: The Housing Partnership

⁹⁸ 36.70A RCW

⁹⁹ Shoreline Management Program, 14th Goal of GMA added by Legislature in 2010.

¹⁰⁰ RCW 36.70A.020(4)

¹⁰¹ <http://apps.leg.wa.gov/rcw/default.aspx?cite=36.70A.540>

¹⁰² <http://apps.leg.wa.gov/WAC/default.aspx?cite=365-196-410>

¹⁰³

http://www.kingcounty.gov/property/permits/codes/growth/CompPlan/2008_2010update.aspx#chapters

¹⁰⁴ <http://factfinder2.census.gov/faces/nav/jsf/pages/index.xhtml>

¹⁰⁵ <http://www.wcrer.wsu.edu/default.aspx>

¹⁰⁶ <http://www.wcrer.wsu.edu/MarketData.html>

¹⁰⁷ RCW 36.70A.020(3)

¹⁰⁸ RCW 36.70A.070(6)

¹⁰⁹ Municipal Research and Services Center

<http://www.mrsc.org/subjects/transpo/efficientlanduse.aspx>

¹¹⁰ Urban Land Institute, *Land Use and Driving: The Role Compact Development Can Play in Reducing Greenhouse Gas Emissions*

- [to table of contents](#)
- [previous chapter](#)
- [next chapter](#)
- [endnotes](#)

Chapter 7

Procedural Process – Public Participation – SEPA for Urban Growth Areas

The Growth Management Act (GMA) provides the framework for jurisdictions to review and update Urban Growth Areas (UGAs). The Washington Administrative Code (WAC) provides additional guidance to jurisdictions on the GMA's procedural requirements for UGAs. Through adoption of Countywide Planning Policies, counties and cities further establish policies and processes to recognize and respond to local conditions. This combination of state and local laws, locally adopted policies, and Growth Management Hearings Board and court cases, ultimately shapes the procedural processes that jurisdictions follow to review and update their UGAs.

The GMA requires early and continuous public involvement and consideration of proposals and alternatives for comprehensive plan updates. This is particularly appropriate for updating UGAs, which typically involves a multi-stage process in which a range of choices are made, including new growth forecasts, new land use designations potentially involving multiple properties over broad areas, potentially significant changes to capital facilities plans, and other changes.

Review under the State Environmental Policy Act (SEPA) is required for UGA updates, and can provide a useful framework for identifying and disclosing potential impacts of the various choices involved in establishing and updating UGAs.

This chapter of the guidebook will examine the GMA and administrative rules that provide procedural guidance for review and update of UGAs. It describes lessons from several relevant Growth Management Hearings Board and court cases, along with integration of SEPA into the GMA's requirements. Finally, this chapter will highlight local examples of a work program and public participation program used in the review and update of UGAs.

GMA Statutes

The bedrock of the GMA¹¹¹ is the goal of public participation and coordination between communities. RCW 36.70A.020(11) provides the following:

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

The GMA gives additional guidance to counties and cities to meet this goal by requiring reasonable notice from counties and cities to their citizens of proposed amendments to comprehensive plans and development regulations before local legislative bodies adopt those proposed amendments¹¹².

RCW 36.70A.140 requires that local jurisdictions establish public participation programs with procedures to provide for early and continuous participation in the development and amendment of comprehensive plans and the development regulations that implement those plans. Procedures need to provide for; “broad dissemination of proposals and alternatives, opportunities for written comments, public meetings after effective notice, provision for open discussion, communication programs, information services, and consideration of and response to public comments.”

In addition, RCW 36.70A.130(2)(a) requires counties and cities to identify their procedural process for updating, amending or, revising their comprehensive plans as follows: “Each county and city shall establish and broadly disseminate to the public a public participation program consistent with RCW 36.70A.035 and 36.70A.140 that identifies procedures and schedules whereby updates, proposed amendments, or revisions of the

- [to table of contents](#)
- [previous chapter](#)
- [next chapter](#)
- [endnotes](#)

comprehensive plan are considered by the governing body of the county or city no more frequently than once every year.”

These statutes assure citizens that their counties and cities will provide effective notice and the opportunity for comment and participation in local planning activities. In recent years, the Legislature has amended RCW 36.70A.130 to give local governments and citizens additional time for review and update of their plans and to make the deadline requirements for comprehensive plans and UGAs, coincide.

Helpful Guidance from the Washington Administrative Code

Commerce updated the Washington Administrative Code (WAC) for the GMA in 2010 with new sections added to provide guidance on public participation and SEPA. The following guidelines describe how to involve citizens in their local planning processes and how to utilize SEPA with the GMA to manage growth within UGAs:

WAC 365-196-600 Public participation¹¹³

This section of the WAC provides direction for counties and cities to establish early and continuous involvement by citizens when developing or amending comprehensive plans and development regulations. Procedures for public participation must include broad dissemination of proposals and alternatives, as well as notice, opportunities for comment, and public meetings. The adoption record should show how the public participation process was met and should contain all factual data related to developing or amending plans and regulations. In addition, this section of the WAC provides guidance for: designing a public participation program; integrating SEPA; involving stakeholders; options to provide adequate notice; methods to receive public comment; review and response to public comment; considering changes after the public comment period has closed; and ensuring local procedural processes have been met.

WAC 365-196-620 Integration of SEPA¹¹⁴

This section of the WAC provides guidance on the integration of State Environmental Policy Act (SEPA) process with creation and adoption of comprehensive plans and development regulations. SEPA is required for adoption or amendment of comprehensive plans and development regulations, and as such, are defined as actions subject to environmental analysis. SEPA supplements the GMA process and provides local decision makers a record of analysis for various planning alternatives. SEPA analysis of alternatives can evaluate the

fiscal impacts, environmental impacts, capital facilities needs, and traffic forecast and system needs for each alternative. This section of the WAC also describes the process for using a phased SEPA review with the GMA process, consideration of inter-jurisdictional impacts, other SEPA rules, and planned actions enabled by the Regulatory Reform Act of 1995 (chapter 36.70B RCW and WAC 365-197-030).

Growth Management Hearings Board Cases

The following selected case summaries are reprinted from Growth Management Hearings Board digests. These cases address how jurisdictions conduct the procedural process, public participation, and integration of SEPA into planning for UGAs. Full texts of cases may be obtained from the Hearings Board website at www.gmhb.wa.gov

Procedural Process and Public Participation Cases:

The touchstone of the public participation goals and requirements of the GMA involve “early and continuous” public involvement. Achen v. Clark County 95-2-0067 (FDO, 9-20-95)

Under the GMA, a County has an affirmative duty to dispense as much accurate information to as many people as it possibly can. Simply providing access does not satisfy that duty. Mudge v. Lewis County 01-2-0010c (FDO, 7-10-01)

“This Board has always held that public participation was the very core of the Growth Management Act.” Wilma et al. v. Stevens County, EWGMHB Case No.: 99-1-0001c FDO at 6 (May 21, 1999). At a minimum, this means that the public must have an opportunity to comment on amendments prior to adoption by the local legislative body unless the amendments fall under one of the exceptions in RCW 36.70A.035(2)(b). Larson Beach Neighbors, et al. v. Stevens County. EWGMHB Case No. 04-1-0010, FDO (Feb. 2, 2005).

As we held in 1000 Friends, et al. v. Spokane County, supra, “amendment,” as it’s used in RCW 36.70A.035(2)(a) refers to amendments or changes made to a planning document during the legislative body’s consideration of the plan or development regulations. Each amendment or change made during this process, which is not

- [to table of contents](#)
- [previous chapter](#)
- [next chapter](#)
- [endnotes](#)

exempted under RCW 36.70A.035(2)(b), therefore requires at least one additional opportunity for public comment with appropriate notice and time to review the amendments prior to adoption. No other interpretation makes sense given the importance the GMA places on public participation as evidenced by the three statutes at issue in this case. Nor is any other interpretation reconcilable with the clause contained in RCW 36.70A.140 that requires “early and continuous public participation in the development and amendment of comprehensive land use plans and development regulations...” *City of Spokane v. Spokane County and City of Airway Heights*, EWGMHB Case No. 02-1-0001, FDO (July 3, 2002).

[Board recognized the GMA provisions related to public participation:] ... RCW 36.70A.140 establishes the requirement that local jurisdictions adopt public participation programs that provide for early and continuous public participation. The GMA has other public participation requirements. RCW 36.70A.020(11) establishes a goal to encourage the involvement of citizens in the planning process. RCW 36.70A.035 requires the county to establish notice procedures that are reasonably calculated to provide notice to property owners and other affected individuals and entities. RCW 36.70A.070 requires that the county adopt its comprehensive plan in accordance with its public participation procedures. *Spraitzar v. Island County*, Case No. 08-2-0023, FDO, at 6 (Nov. 10, 2008).

[RCW 36.70A.130] outlines the procedures for consideration and adoption of proposed plan amendments. This process amplifies and refines the broader .140 public participation process that applies to the adoption and amendment of plans and development regulations. Providing the opportunity for public participation is a condition precedent to adoption or amendment of a plan. Here, a special process for plan amendments is required. The limitation on considering proposed plan amendments “no more frequently than once every year,” or annual concurrent review provision, necessitates the establishment of deadlines and schedules for filing and review of such amendments so they can be considered concurrently. Although this section provides exceptions to the annual concurrent plan review limitation, none of these exceptions are excused from public participation requirements. [McVittie V, 00- 3-0016, FDO, at 19.]

[RCW 36.70A.390] does not apply to plan amendments. It does not apply to permanent changes in development regulations or controls. It applies only to the adoption or amendment of temporary controls or development regulations, those measures that are adopted for an interim period – generally six-months. This section of the Act is unique in that it permits a deviation from the norm of providing the opportunity for public

participation prior to action; here a jurisdiction can act or adopt first, then provide the opportunity for public participation after adoption. However, this post-adoption opportunity for public participation must occur within 60-days of adoption. [McVittie V, 00-3-0016, FDO, at 20.]

[Plan] Amendments precipitated by emergencies are clearly governed by .130(2)(b), not .140 or even .130(2)(a). Within the confines of the goals and requirements of the Act, local governments have discretion to determine what “appropriate public participation” to provide before they take action on emergency plan amendments. The word “after” [in .130(2)(b)’s phrase “after appropriate public participation] evidences the clear and explicit Legislative intent to prohibit adoption of a plan amendment until “after” (behind in place or order, subsequent in time, late in time than, following) (citation omitted) appropriate public participation takes place. [McVittie V, 00-3-0016, FDO, at 23-24.]

The GMA “[e]ncourage[s] the involvement of citizens in the planning process,” RCW 36.70A.020(11). To achieve this goal, the Act requires cities and counties to have a public participation program that provides for “early and continuous public participation in the development and amendment of comprehensive land use plans” and for “broad dissemination of proposals and alternatives, opportunity for written comments, public meetings after effective notice.” RCW 36.70A.140; see also, RCW 36.70A.070 (preamble) and RCW 36.70A.130(2)(a). It is axiomatic that without effective notice, the public does not have a reasonable opportunity to participate; therefore, the Act requires local jurisdictions’ notice procedures to be “reasonably calculated to provide notice to property owners and other affected and interested individuals, . . .” RCW 36.70A.035(1). [Andrus, 98-3-0030, FDO, at 6-7.]

[Providing effective notice] generally shifts to the recipient the responsibility to inquire, keep informed and involve[d] (Citation omitted). [Halmo, 07-3-0004c, FDO, at 15.]

“Take into account public input” means “consider public input.” “Consider public input” means “to think seriously about” or “to bear in mind” public input; “consider public input” does not mean “agree with” or “obey” public input. [Twin Falls, 93-3- 0003c, FDO, at 77; Buckles, 96-3-0022c, FDO, at 22.]

- [to table of contents](#)
- [previous chapter](#)
- [next chapter](#)
- [endnotes](#)

As society and technology have changed over time, so too have communities and residential neighborhoods changed. This has been reflected in changes in statute and case law at both the federal and state levels. 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 Alliance I, FDO, 7/25/95, at 5, footnote omitted]

Growth is more than simply a quantitative increase in the numbers of people living in a community and the addition of "more of the same" to the built environment. Rather, it encompasses the related and important dynamic of change. Because the characteristics of our population have changed with regard to age, ethnicity, culture, economic, physical and mental circumstances, household size and makeup, the GMA requires that housing policies and residential land use regulations must follow suit. This transformation in our society must be reflected in the plans and implementing measures adopted to manage growth and change. [Children's I, 95-3-0011, FDO, at 9.]

This planning goal [Goal 4] uses the verbs "encourage" and "promote" which are permissive verbs, and thus this goal does not constitute an independent substantive requirement in isolation from a specific GMA requirement ... Goal 4 must be considered together with the affirmative requirements for the Comp Plan Housing Element set forth in RCW 36.70A.070(2). Ninth Street Mobile Home Park v. City of Wenatchee, EWGMHB Case No. 07-1-0008, FDO at 6 (March 16, 2009).

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.]

RCW 36.70A.400 states that any local government that is planning under the Housing Policy Act shall comply with RCW 43.63A.215(3). The Board finds that RCW 43.63A.215, when read as a whole, requires local governments to adopt development regulations, zoning regulations or official controls that provide for accessory dwelling units in areas zoned for single-family residential use by Dec. 31, 1994. *Coalition of Responsible Disabled v. City of Spokane*, EWGMHB Case No. 95-1-0001, Dispositive and FDO, at 2 (June 6, 1995).

Urban density goals and requirements of the GMA relate primarily to anti-sprawl and compact development. They do not, in and of themselves, address affordable housing goals and requirements. *Achen v. Clark County* 95-2-0067 (RO 12-6-95) [The County's CPP, allowing an individual UGA to be potentially expanded to adjacent land for an affordable housing crisis did not comply with the Act – RCW 36.70A.215. (Note: A CPP, allowing an individual UGA to be potentially expanded for additional residential land is permissible if a need for additional residential land is demonstrated in a land capacity and reasonable measures have been taken. The challenged CPP bypassed .215's reasonable measures requirement.) The Board also commented that a land capacity analysis for residential land is off point in relation to a potential expansion of a UGA pursuant to an "affordable housing crisis," which is the basis for this potential UGA expansion.] Whether the existing and projected housing stock is affordable falls within the parameters of RCW 36.70A.070(2) – the Housing Element. A GMA Plan's Housing Element is required to identify sufficient land for housing, including government-assisted housing, housing for low-income families, manufactured housing, multifamily housing, and group homes and foster care facilities. RCW 36.70A.070(2)(c). Also the Housing Element requires jurisdictions have adequate provision for existing and projected housing needs for all economic segments of the community. RCW 36.70A.070(2)(d). Therefore, reliance upon just a land capacity analysis without supporting documentation in the County's Housing Element would be inadequate to implement [a UGA expansion pursuant to this CPP. The Board found this CPP noncompliant.] [CTED, 03-3-0017, FDO, at 35-36.]

Higher density single family and multifamily housing (apartments, cottage housing, condominiums and townhouses, etc.) adds variety to housing alternatives within urban areas to help make housing affordable for all segments of the population. [Goal 4 and RCW 36.70A.070(4)]. [Kaleas, 05-3-0007c, FDO, at 14]

RCW 36.70A.540, enacted in 2006, sets out the requirements for housing incentive programs which cities or counties may adopt as development regulations in order to meet their affordable housing goals. . . Incentive

- to table of contents
- previous chapter
- next chapter
- endnotes

programs may include density bonuses, height and bulk bonuses, fee waivers, parking reductions, expedited permitting, and mixed use projects. [Futurewise V, 07-3-0014, FDO, at 5.]

SEPA Cases:

In 1995, the Washington State Legislature expanded the Board's jurisdiction to include SEPA actions taken to comply with the GMA as part of regulation reform legislation (RCW 36.70A.280). The stated purpose was to simplify regulatory compliance. Standing for issues before this Board is under the GMA and Cascade Columbia Alliance has adequately demonstrated standing. The Board finds that standing under the GMA is sufficient standing to raise SEPA issues before this Board. This decision concurs with the ruling of the Western Washington Growth Management Hearings Board in *Achen, et al. v. Clark County WWGMHB* Case No. 95-2-0067. *Cascade Columbia Alliance, v. Kittitas County, EWGMHB* Case No. 98-1 0007, Order on Motions (March 1, 1999).

The County has flexibility in preparing the non-project EIS for the Comprehensive Plan. WAC 197-11-443(2) provides that a “non-project proposal may be approved based on an EIS assessing its broad impacts. When a project is then proposed consistent with the approved non-project action, the EIS on such a project shall focus on the impacts and alternatives including mitigation measures specific to the subsequent project and not analyzed in the nonproject EIS. The scope shall be limited accordingly...” *Citizens for Good Governance, et al. v. Walla Walla County, EWGMHB* Case Nos. 01-1-0015c & 01-1-0014cz, FDO (May 1, 2002).

[W]hen a county or city amends its CP or changes zoning, a detailed and comprehensive SEPA environmental review is required. SEPA is to function “as an environmental full disclosure law”, and the County must demonstrate that environmental impacts were considered in a manner sufficient to show “compliance with the procedural requirements of SEPA.” Although the County decision is afforded substantial weight, environmental documents prepared under SEPA require the consideration of “environmental” impacts with attention to impacts that are likely, not merely speculative, and “shall carefully consider the range of probable impacts, including short-term and long-term effects” ... the purpose of SEPA is “to provide consideration of environmental factors at the earliest possible stage to allow decisions to be based on complete disclosure of environmental consequences,” and that SEPA is to provide agencies environmental information prior to making decisions, not after they are made. *Henderson v. Spokane County, EWGMHB* Case No. 08-1-0002, FDO at 14 (Sept. 5, 2008).

The County deferred environmental review to the project stage, which essentially makes the SEPA process moot. SEPA is to provide agencies environmental information prior to making decisions, not after they are made. Thus, SEPA seeks a prospective review of the environmental impacts of a proposal before the decision to authorize the action is made. SEPA does not seek a post-hoc retrospective analysis once a decision has been made and a project has been developed. *Henderson v. Spokane County*, EWGMHB Case No. 08-1-0002, FDO at 18 (Sept. 5, 2008).

An environmental analysis should be done at each stage of the GMA planning process and should address the environmental impacts associated with the planning decisions at that stage. Impacts associated with later planning stages, such as when there is a detailed project as in this case, may also be addressed to the extent that sufficient information is known for the analysis to be meaningful. The County's environmental review should have considered the full development potential of the site [under applicable development regulations]. *Henderson v. Spokane County*, EWGMHB Case No. 08-1-0002, FDO at 19 (Sept. 5, 2008).

The [environmental] impacts that must be considered for this non-project action are the impacts that are allowed by virtue of the change in designation itself. While project level impacts may properly be deferred to the permitting stage, the County must evaluate the impacts allowed under the changed designation at the time of that non-project action. *Whidbey Environmental Action Council v. Island County* 03-2-0008 (FDO, 8-25-03)

Deferring environmental review of the uses established by this non-project action to the permitting stage is an improper use of phasing that would divide a larger system into exempted fragments and avoid discussion of cumulative impacts. *Whidbey Environmental Action Council v. Island County* 03-2-0008 (FDO, 8-25-03)

City of Shoreline, Town of Woodway and Save Richmond Beach, Inc. v. Snohomish County, Coordinated Case Nos. 09-3-0013c and 10-3-0011c: Analysis of alternatives is central in nonproject SEPA review [citing WAC 197-11-442(2) (4)]. [While SEPA provides more flexible review for nonproject actions, the “bookend” analysis of no-action and proposed-action in the present case fails to provide any information to allow decisions that might “approximate the proposal’s objectives at a lower environmental cost” WAC 197-11-786]. (Corrected FDO May17, 2011)

- to table of contents
- previous chapter
- next chapter
- endnotes

From the evidence in the record and from the fundamental structure of the GMA itself, the Board concludes that the County's choice of the annual growth rate is policy, a goal, and a change from the 2004 adopted CP. AMENDED FINAL DECISION AND ORDER Western Washington Case No.(Clark County 07-2-0027 amended FDO at 13)

The use of a phased approach during an integrated approach authorized by WAC 365-195-760(3) that requires that the front end of the GMA/SEPA analysis be thorough, is critical. A phased approach may not be used to simply delay SEPA analysis until permitting decisions. Butler v. Lewis County 99-2-0027c (FDO, 6-30-00)

A party wishing to challenge a SEPA determination must meet a two-part test to establish standing: (1) The plaintiff's supposedly endangered interest must be arguably within the zone of interests protected by SEPA; (2) the plaintiff must allege an injury in fact; that is, the plaintiff must present sufficient evidentiary facts to show that the challenged SEPA determination will cause him or her specific and perceptible harm. The plaintiff who alleges a threatened injury rather than an existing injury must also show that the injury will be "immediate, concrete, and specific"; a conjectural or hypothetical injury will not confer standing. [WSDF I, 94-3-0016, 4/22/94 Order, at 6-7.]

The Board will apply the Trepanier/Leavitt test as follows: When the underlying action is the adoption of an "environmental protection" piece of legislation such as a critical areas ordinance, the Board will strictly apply the SEPA standing test. When the underlying action is the adoption of a piece of legislation that does not inherently or explicitly involve the direct protection of the environment, the Board will apply the SEPA test more loosely. Examples of such legislation are the capital facilities, transportation or housing elements of a comprehensive plan. [Pilchuck II, 95-3-0047c, 8/17/95 Order, at 6.]

[In commenting on the strictness of the Trepanier test and subsequent difficulty in establishing SEPA standing, the Board noted in a footnote] The Board notes that a petitioner that challenges a non-project action that shifted land from one of the GMA's three fundamental and significant land use categories – Resource, Rural or Urban – to a more intense land use category, could arguably satisfy the strict application of Trepanier SEPA standing test. [MBA/Brink, 02-3-0010, 10/21/01 Order, footnote 6, at 5-6.]

[The Board applied its SEPA standing test to the facts at hand and concluded that the challenged] reclassification from one land use designation to another may be a threatened injury, but environmental impacts or injuries are not immediate, concrete or specific when such a reclassification occurs; they are only conjectural and hypothetical and dependent upon whether any subsequent development occurs. [Dyes Inlet, 07-3-0021C, 5/3/07 Order, at 5.]

[In applying the Trepanier SEPA standing “injury-in-fact” test, the Board found that an urban center designation in the unincorporated areas outside the city limits constituted injury-in-fact to the City for the following reasons:] the inadequacy of the SEPA review at this level [non-project planning level] causes the City immediate injury because, for the whole range of possible projects within the new designation, the City is required to provide urban services and infrastructure. Lynnwood’s own urban center plan, transit center plan, and capital facilities plans must now be revisited in light of new demands on its capacity. Further, it is undisputed that Scriber’s application for the additional allowed development has vested. With a vested application, the Board finds that the “conjectural or hypothetical” aspects of the proposal are substantially diminished if not removed. [Bothell, 07-3-0026C, 6/1/07 Order, at 5.]

[In its Order on Motions the Board concluded that the City of Lynnwood had demonstrated injury-in-fact, meeting the Trepanier test and therefore had standing to pursue a SEPA claim. However, the City failed to comment on the County’s SEPA documents. To challenge the adequacy of those environmental documents before the Board at this time is barred – WAC 197-11-545.] [Bothell, 07-3-0026C, FDO, at 62-64.] Court Cases

Court cases related to planning process, public participation, and SEPA requirements pursuant to the GMA are available from the Municipal Research and Services Center or directly from the Washington State Courts website at: <http://www.courts.wa.gov>. The following selected court cases involve SEPA:

Davidson Serles & Assocs. v. City of Kirkland, 159 Wn. App. 616 (2011). The Growth Management Hearings Board has exclusive jurisdiction to review challenges to comprehensive plans and development regulations that are based on SEPA. Also, no EIS is required for planned action projects because the environmental impacts of the individual planned action projects will have been addressed in an EIS prepared earlier in conjunction with one of the six activities listed in RCW 43.21C.031(2)(a)(ii).

- [to table of contents](#)
- [previous chapter](#)
- [next chapter](#)
- [endnotes](#)

Douglass v. City of Spokane Valley, 154 Wn. App. 408 (2010). The court upheld the hearing examiner's decision reversing the city planning department and requiring preparation of an EIS for a proposed housing development to address egress from the area of the proposed development (an area of high fire risk) in the event of a firestorm event that would require evacuation of the area.

Moss v. City of Bellingham, 109 Wn. App. 6 (2001), [review denied](#), 146 Wn.2d 1017 (2002). The Integration of Growth Management and Environmental Review Act (Laws of 1995, ch. 347) seeks to avoid duplicative environmental analysis and substantive mitigation of development projects by assigning State Environmental Policy Act a secondary role to: (1) more comprehensive environmental analysis in plans and their programmatic environmental impact statements; and (2) systematic mitigation of adverse environmental impacts through local development regulations and other local, state, and federal environmental laws. One of the provisions of that Act, RCW 43.21C.240, as implemented by WAC 197-11-158, substantially streamlines the threshold determination process for cities and counties planning under the GMA by authorizing the SEPA official to rely on existing plans, laws, and regulations in meeting SEPA requirements. Thus, the development of a large scale subdivision within a UGA does not, ipso facto, require the preparation of an EIS. Following enactment of the Integration of Growth Management and Environmental Review Act, an EIS is not required for a major subdivision development within a UGA if the conditions of plat approval imposed pursuant to local planning and zoning laws and local, state, and federal development or environmental laws adequately mitigate all the significant adverse environmental impacts of the proposed development.

Procedural Process

With numerous moving parts in the procedural process for review and update of UGAs, counties and their cities should adopt a work program to initiate several important processes concurrently, as they work together to meet the timelines established in RCW 36.70A.130. Some counties and cities conduct their UGA review and update more frequently than the 8-year minimum set by statute. Initiating a work program for review and update of UGAs should begin approximately one to two years prior to either the locally adopted or statutory deadline. A review and update of UGAs, consistent with the statutory minimum, should include at least the following:

- Adoption of an UGA work program
- Coordination and inter-local agreements between a county, its cities, Ports, and Tribes
- Adoption of criteria to evaluate UGAs
- Public participation
- Recent OFM population forecasts for GMA planning
- Adoption of an initial countywide population projection and population allocations to each jurisdiction to plan for
- Land Capacity Analysis
- State Environmental Policy Act (SEPA) integration
- Update of Capital Facilities Plans (CFPs)
- Regional transportation analysis
- Essential public facility needs
- Levels of service for UGAs (LOS)
- Coordination with special purpose districts for provision of service (e.g. school district)
- State agency coordination
- Regional watershed planning and water availability
- Evaluation of critical areas, shorelines, and resource lands
- Adoption, implementation, and monitoring of updated UGAs

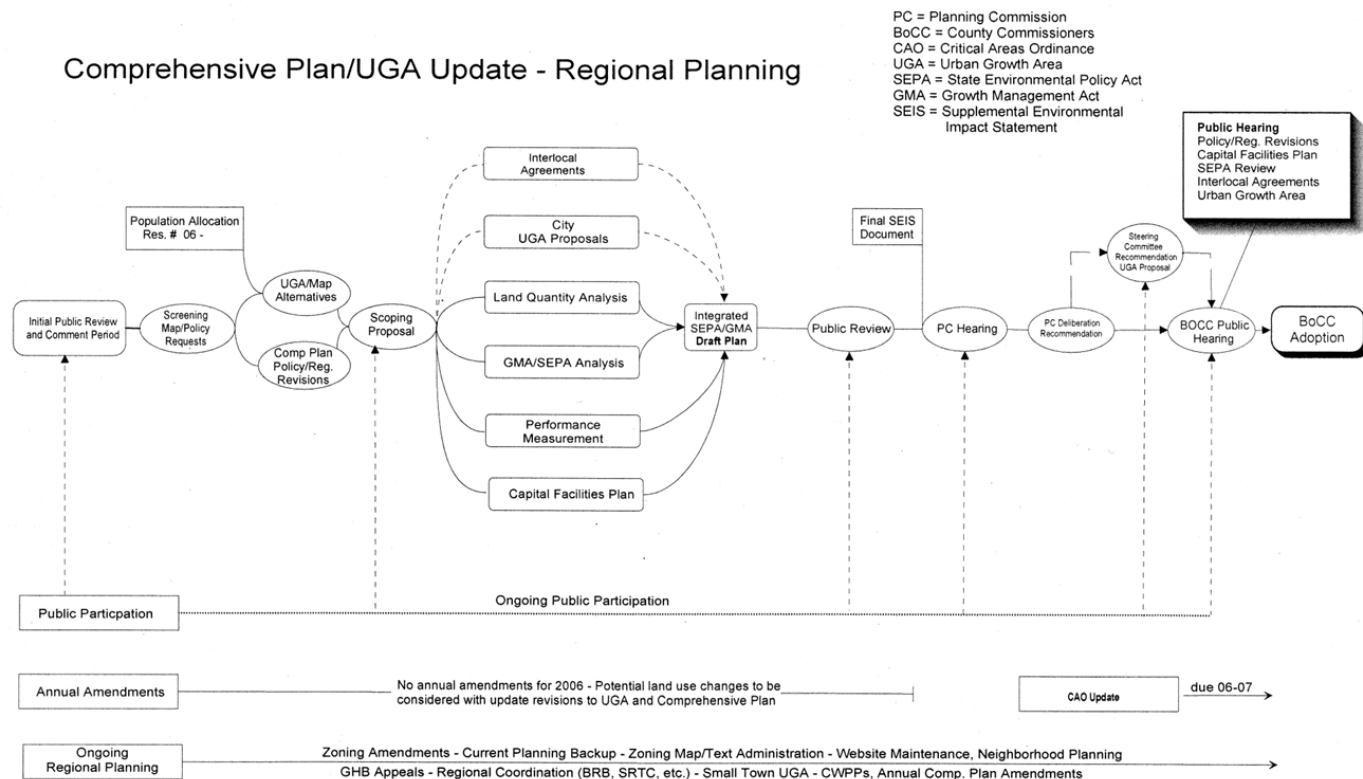
UGA review and update is an iterative process, allowing local decision makers and citizens the ability to respond to changes in their communities. Certain initial assumptions may need to be adjusted as jurisdictions move further into their review and update efforts based on analysis from other parts in the UGA planning

■ [to table of contents](#)
 ■ [previous chapter](#)
 ■ [next chapter](#)
 ■ [endnotes](#)

process. For example, the cost of providing urban services and a regional transportation system, at current adopted LOS, may be more than the county and cities can financially obligate themselves to if planning for a high countywide population projection in their Capital Facilities Plans. An alternative would be to lower the countywide population projection within OFM's forecast range, in order to align population growth with the jurisdictions' ability to provide and pay for urban services and transportation systems.

Collaboration is the key. All the cities in our state need a public works investment system for the 21st century. We can only create such a system if the state and cities work together to address the infrastructure deficit that slows economic growth, and potentially endangers both public health and the environment. Investments are

Figure 7-1 Spokane County Update Process



Source: Spokane County

needed to support the economic recovery, address the most critical infrastructure deficits, and help meet state and federal regulatory requirements.¹¹⁵

Local Examples

Example 1: Spokane County Comprehensive Plan Update

Introduction

This document is intended to identify and provide details on the work program to complete the Spokane County Comprehensive Plan update. The topical areas discussed below relate to the items identified within the flow chart on the preceding page. This program suggests, for the Boards consideration, a streamlined approach which would allow a more timely adoption of the plan update. Adoption of the plan update is important in that it ensures that Spokane County is in compliance with the Growth Management Act and maintains eligibility for state grant funding.

Grant funding that requires compliance with the GMA includes the Public Works Trust Fund, Centennial Clean Water Fund, Community Economic Revitalization Board, and the State Revolving Fund.

Initial Public Review and Comment

The County has had open review and comment on the Comprehensive Plan update since April of 2005. In that time we have received close to 300 comments which have largely been requests to modify map designations or UGA boundaries. These requests have been mapped and included on the County's website. We continue to receive inquiries and requests for changes.

Population Allocation

The County's population allocation has been verbally approved by the Board. Formal findings and decision should be finalized to provide a complete record for the update process. The population allocation provides the starting point for communities to develop their comprehensive plan update.

Screening Map/Policy Requests

- [to table of contents](#)
- [previous chapter](#)
- [next chapter](#)
- [endnotes](#)

Identifying a reasonable proposal for review is difficult considering the large number of individual map change requests that have been received. With close to 250 map change requests (and counting) throughout the County, the ability of

County staff to complete detailed analysis of each request is beyond the staff resources available. A more reasonable approach is to streamline the process and view changes from a regional perspective. To reduce the complexity of the update and to ensure a more timely adoption, the following strategy is suggested:

- Limit review of Urban Growth Area (UGA) proposals to larger sub-areas located adjacent to the existing Urban Growth Area boundary rather than providing detailed review of individual requests.
- Consider requests for changes to outlying rural designations in future annual amendments to the Comprehensive Plan. Detailed review of these requests would require substantial dedication of staff resources and could delay adoption of the plan update.
- Consider changes from Large Tract Agricultural to Small Tract or Rural designations in a subsequent “County-wide” review of our agricultural lands of long term significance. The Dept. of Agriculture, Natural Resources Conservation Services (NRCS) is finalizing the update to the Spokane County soil map. When completed the updated map will allow the County to conduct a “county-wide” comprehensive review of our agricultural lands.
- Consider only urgent or necessary revisions to the Comprehensive Plan text and development regulations. More detailed and comprehensive changes can be considered in future revisions.
- Annual Amendments for 2006 will not be considered as the plan is undergoing a substantial update.

Scoping Proposal

A scoping proposal is a proposal that identifies the changes to the Comprehensive Plan that are to be considered through the GMA/SEPA review process. The scoping notice will include a summary of map alternatives and proposed changes to the plan text. The scoping proposal is required to include map alternatives in order to meet the requirements of the State Environmental Policy Act (SEPA). Once developed, the scoping proposal is circulated to agencies for review in order to identify potential issues and/or environmental concerns. Comments from agencies will then help to define the scope of the subsequent

SEPA/GMA review. The scoping process helps to ensure that agencies provide comments “up-front” and reduces the likelihood significant issues will be raised at the end of the process. This process can help to avoid lengthy delays from appeals or additional required studies.

Integrated SEPA/GMA Draft Plan

Once the scoping process is completed and the proposed changes are defined, staff can proceed to develop an Integrated SEPA/GMA Draft Plan. This document would meet the requirements for a supplemental environmental impact statement (SEIS). The SEIS will build on past environmental studies and would evaluate only the changes proposed by the plan update. The process will require less review than development of a new environmental impact statement (EIS). The Integrated SEPA/GMA Draft Plan consolidates the review requirements of the Growth Management Act and the State Environmental Policy Act into one document. The document will include the plan map (including alternatives and city UGA proposals), plan text, and regulatory revisions. The document will also include an analysis as required by SEPA and GMA. Additionally the document will include as attachments the following:

- **Land Quantity Analysis** per the criteria established in the Countywide
- Planning Policies
- **Performance Measurement Report** that will analyze the performance of the Comprehensive Plan from adoption to the current date.
- **Capital Facilities Plan** that will provide an analysis of the ability of capital facilities to serve the updated plan.
- **Interlocal Agreements** as adopted or as may be adopted through the plan update process.

Public Review and Adoption

The draft integrated SEPA/GMA plan will require public review including processing through the Planning Commission, Steering Committee of Elected Officials and the Board. The sequence of this process is illustrated in the attached flow chart. Additionally a public participation plan is provided as an attachment to this report.

BoCC Adoption

Spokane County is required by RCW 36.70A to adopt the Comprehensive Plan update by December 1, 2006. Considering the required studies, public process, and need for intergovernmental cooperation, this milestone is

- [to table of contents](#)
- [previous chapter](#)
- [next chapter](#)
- [endnotes](#)

unlikely to be met. A streamlined approach to the process as described above provides the best opportunity for adoption in the most-timely manner.

Critical Areas Update

In addition to the Comprehensive Plan Update, Spokane County is also required by RCW 36.70A to update the Critical Areas Ordinance (CAO) by June of 2007.

This update will require an additional work program to ensure compliance with the mandated timeframe.

Example 2: City of Lacey Public Participation Program

The City of Lacey recently updated its Public Participation Program (PPP) and added its PPP as an element to the City's Comprehensive Plan. The City provides the following characterization of the value of citizen participation in the planning process together with goals, policies, and core City values:

Public participation is the process by which public concerns, needs, and values are incorporated into governmental decision making. Citizen participation is essential to local issues of community development, from an initial land use plan to the siting of parks, the routing of vehicular and pedestrian traffic, and to determining what street tree theme should be required for new development. This Public Participation element of the City of Lacey Comprehensive Plan provides a framework for public participation as a central focus of Lacey's organizational culture. Its purpose is to describe the city's policies for citizen participation and support ways to achieve successful partnering with citizens, organizations and business in planning, developing, and maintaining our community. In considering the benefits, legal requirements and many options and techniques for achieving successful citizen participation, the following goal is adopted as part of Lacey's public participation program:

1. Goal: Promote and maintain active community involvement in the planning decision process, whereby all who are affected have the opportunity to be informed and participate in the decision process.

Policies: To implement the identified goal the following policies are adopted:

a. **Policy:** Apply the most appropriate public participation tools and methodology based upon the planning task, objectives and resources available.

- b. **Policy:** Follow the principles and the intent of the Public Participation Element in the development of, and in taking action on, planning tasks to effectively provide an opportunity for citizen participation in planning programs.
- c. **Policy:** Provide information about the structure of city government and decision processes to organizations and the general public to enable effective participation.
- d. **Policy:** Encourage and facilitate public participation in planning activities by designing user friendly processes tailored to individual efforts that inform and educate the public about the substance of issues and that provide opportunities for involvement.
- e. **Policy:** Proactively inform citizens of programs, educational information and/or pending issues; where appropriate, use city publications, email, direct mail, video broadcast, city web site, print media and other techniques discussed in the Public Participation Element.
- f. **Policy:** Develop public participation strategies for planning projects and/or decision processes to inform target groups and citizens with an interest in particular planning activities. Where appropriate to engage target audiences, consider the use of various outreach techniques such as opinion surveys, speaker programs, forums, workshops, open houses, hands-on events, task forces and newer technologies such as email, internet and social media, as well as new innovative techniques and ideas as they are identified.
- g. **Policy:** Encourage open communication between developers and neighbors about project compatibility with adjacent properties.
- h. **Policy:** Encourage neighborhood residents, neighborhood organization representatives, and home owner associations to work with the City to develop Comprehensive Land Use Plan monitoring and implementation programs and capital improvement plans for neighborhood areas.
- i. **Policy:** Provide city representation and participation, as staff resources allow, at meetings held by homeowner associations, and civic and business groups, to provide information on current and pending planning issues affecting the city.

Core Values of the City

- [to table of contents](#)
- [previous chapter](#)
- [next chapter](#)
- [endnotes](#)

In the development of the goal and policies for citizen participation, the City referred to several core values established by the International Association for Public Participation. The following core values for public participation are considered by the City as key to a strong and open public participation process:

1. The public should have a say in decisions about actions that affect their lives.
2. Public participation includes the promise that the public's contribution will influence the decision.
3. The public participation process communicates interests and meets the process needs of participants.
4. The public participation process seeks out and facilitates involvement of those potentially affected.
5. The public participation process involves participants in defining how they participate.
6. The public participation process provides participants with the information they need to participate in a meaningful way.
7. The public participation process communicates to participants how their input affected the decision.

The full text of Lacey's PPP is available on the City's website¹¹⁶. Jurisdictions such as Lacey, when updating their non-project plans and development regulations, often integrate SEPA into their GMA legislative actions. Integration of SEPA and GMA can involve the public early on in the environmental analysis for review and update of comprehensive plans, UGAs, and development regulations consistent with 43.21C RCW and the administrative rules of WAC 197-11¹¹⁷.

Integrating the SEPA and the GMA¹¹⁸

SEPA requires all state and local agencies to use an interdisciplinary, integrated approach to include environmental factors in both planning and decision-making. Although the terms "SEPA review" and "environmental review" include formal SEPA determinations and environmental analyses, these terms also refer to the basic concept of taking environmental quality into account in whatever an agency does.

Under GMA, cities and counties adopt policies, plans, and regulations to manage land use, environmental resources, and other aspects of growth within their own jurisdictions, and in a coordinated way with other jurisdictions. It is not possible to meet the goals or requirements of GMA or to make informed planning decisions without giving appropriate consideration to environmental factors. The GMA non-project actions such as the adoption of policies, plans, and regulations form the basis for subsequent "on the ground" project decisions that directly affect our environment.

Environmental review at the planning stage allows the GMA city or county to analyze impacts and determine mitigation system-wide, rather than project by project. This allows cumulative impacts to be identified and addressed, and provides a more consistent framework for the review, conditioning, or denial of future projects. See Appendix A for more information on integrating the SEPA and the GMA.

Legislative Findings for the SEPA: RCW 43.21C.020

The legislature, recognizing that a human being depends on biological and physical surroundings for food, shelter, and other needs, and for cultural enrichment as well; and recognizing further the profound impact of a human being's activity on the interrelations of all components of the natural environment, particularly the profound influences of population growth, high-density urbanization, industrial expansion, resource utilization and exploitation, and new and expanding technological advances and recognizing further the critical importance of restoring and maintaining environmental quality to the overall welfare and development of human beings, declares that it is the continuing policy of the state of Washington, in cooperation with federal and local governments, and other concerned public and private organizations, to use all practicable means and measures, including financial and technical assistance, in a manner calculated to: (a) Foster and promote the general welfare; (b) create and maintain conditions under which human beings and nature can exist in productive harmony; and (c) fulfill the social, economic, and other requirements of present and future generations of Washington citizens.

The final chapter of the UGA Guidebook will examine implementation of policies and development regulations in UGAs, monitoring the land supply in UGAs, and benchmarking of community indicators that demonstrate how UGAs are being shaped into the communities envisioned by its citizens.

- [to table of contents](#)
- [previous chapter](#)
- [next chapter](#)
- [endnotes](#)

Other Procedural – Public Participation – SEPA Resources

City of Seattle	Public Participation Program ¹¹⁹
City of Liberty Lake	Public Participation Program ¹²⁰
MRSC	Citizen Involvement ¹²¹
MRSC	SEPA ¹²²
Thurston Regional Planning Council	Public Participation Plan - SEPA ¹²³
Whatcom County	Public Participation Plan ¹²⁴
Yakima County	Procedural – Master Inter-local ¹²⁵

Endnotes

¹¹¹ 36.70A RCW

¹¹² RCW 36.70A.035

¹¹³ <http://apps.leg.wa.gov/WAC/default.aspx?cite=365-196-600>

¹¹⁴ <http://apps.leg.wa.gov/WAC/default.aspx?cite=365-196-620>

¹¹⁵ Association of Washington Cities, *State of the Cities Report 2011*

¹¹⁶ <http://www.ci.lacey.wa.us/city-government/city-departments/community-development/planning-documents/library>

¹¹⁷ <http://apps.leg.wa.gov/WAC/default.aspx?cite=197-11>

¹¹⁸ Department of Ecology SEPA Handbook: <http://www.ecy.wa.gov/programs/sea/sepa/handbk.htm>

¹¹⁹ http://www.seattle.gov/dpd/Planning/Seattle_s_Comprehensive_Plan/Overview/

¹²⁰ <http://www.libertylakewa.gov/development/>

¹²¹ <http://www.mrsc.org/subjects/governance/participation/participation.aspx>

¹²² <http://www.mrsc.org/subjects/environment/sepa.aspx>

¹²³ <http://www.trpc.org/abouttrpc/Pages/policies.aspx>

¹²⁴ <http://www.co.whatcom.wa.us/pds/2031/participation/index.jsp>

¹²⁵ <http://www.yakimacounty.us/planning/compplan.html>

- to table of contents
- previous chapter
- next chapter
- endnotes

Chapter 8

Implementation – Monitoring – Indicators and Benchmarks for Urban Growth Areas

The comprehensive plans of counties and cities fully planning under the Growth Management Act (GMA) are required to contain elements¹²⁶ for land use, housing, capital facilities, utilities, rural areas (counties), and transportation systems. Economic development and parks and recreation are also required if the local cost is funded by the state. Optional elements¹²⁷ can also be included to address such topics as conservation, solar energy, subarea plans, and city infrastructure receiving areas¹²⁸. Some cities are also required to have a port element¹²⁹ in their comprehensive plan.

These elements or chapters of comprehensive plans will contain the goals and policies that provide the broad framework for a community to achieve its desired future. The elements can also include techniques or strategies for implementing goals and policies. Elements of a comprehensive plan must be consistent with each other and with the future land use map. Urban Growth Areas (UGAs) are designated on the future land use map, articulated in the goals and policies of the land use element, and further supported by the housing, capital facilities, utilities, and transportation elements of the comprehensive plan.

Those counties and cities required to plan under the GMA¹³⁰, must also adopt development regulations to implement their comprehensive plan goals and policies. Local regulations that implement comprehensive plan goals and policies can include the following:

- Zoning code
- Building code
- Subdivision ordinance
- Binding site plan ordinance
- Critical areas and resource lands ordinances
- Shoreline management plan
- SEPA
- Capital improvement plans and jurisdictional budgets for urban services, public facilities and transportation
- Concurrency ordinances
- Urban design and review standards
- Clustering and planned unit development ordinances
- Neighborhood plans with standards
- Housing ordinance – Housing incentive program
- Historic preservation standards
- Impact fees
- Other

- [to table of contents](#)
- [previous chapter](#)
- [next chapter](#)
- [endnotes](#)

Establishing or updating UGAs requires coordination and cooperation among jurisdictions and service providers. In addition to the ordinances or standards listed above, Countywide Planning Policies¹³¹ and inter-local agreements can also implement regulations for UGAs. Inter-local agreements assure coordination and consistency between neighboring jurisdictions, service providers, and agencies for providing urban services to UGAs. For example, the City of Edmonds Comprehensive Plan states:

It is envisioned that the Comprehensive Plan will be implemented with a broad-based set of implementation actions. Implementation measures will range from tying plan goals and policies to budgeting and infrastructure decisions, to making sure that regulations are coordinated and targeted to achieve expressed policies, to working with both public and private entities to jointly achieve community goals. However, implementation approaches must be designed to address not only the differences between neighborhoods in the city, but also the variation in different situations over time. It is up to the community to determine its desired growth level and up to the government, particularly elected officials, to implement the desired policies.¹³²

This chapter of the guidebook will examine the GMA Statutes and administrative rules that provide direction to implement comprehensive plan goals and policies for UGAs, related Hearings Board cases, tools used by local jurisdictions to implement and monitor development activity in UGAs, community indicators, and benchmarks used by local jurisdictions to track comprehensive plan goal and policy performance in UGAs.

GMA Statutes

The GMA provides the following definition for development regulations:

'Development regulations' or 'regulation' means the controls placed on development or land use activities by a county or city, including, but not limited to, zoning ordinances, critical areas ordinances, shoreline master programs, official controls, planned unit development ordinances, subdivision ordinances, and binding site plan ordinances together with any amendments thereto. A development regulation does not include a decision to approve a project permit application, as defined in RCW 36.70B.020, even though the decision may be expressed in a resolution or ordinance of the legislative body of the county or city.¹³³

The GMA directs counties and cities to implement comprehensive plan goals and policies into their development regulations. In addition to determining who plans under the GMA and what is required, RCW 36.70A.040 states:

Development regulations must implement comprehensive plans.

The GMA gives additional direction to counties and cities when amending comprehensive plans and development regulations, when taken collectively, they

provide sufficient capacity of land suitable for development within their jurisdictions to accommodate their allocated housing and employment growth, including the accommodation of, as appropriate, the medical, governmental, educational, institutional, commercial, and industrial facilities related to such growth, as adopted in the applicable countywide planning policies and consistent with the twenty-year population forecast from the office of financial management.¹³⁴

At the local level, Countywide Planning Policies provide the framework from which county and city comprehensive plans are developed to ensure coordination and consistency for jurisdictions that share common borders or regional issues. RCW 36.70A.210 requires Countywide Planning Policies at a minimum, address the following:

- a) Policies to implement RCW 36.70A.110; (Urban Growth Areas)
- b) Policies for promotion of contiguous and orderly development and provision of urban services to such development;
- c) Policies for siting public capital facilities of a countywide or statewide nature, including transportation facilities of statewide significance as defined in RCW 47.06.140;
- d) Policies for countywide transportation facilities and strategies;
- e) Policies that consider the need for affordable housing, such as housing for all economic segments of the population and parameters for its distribution;
- f) Policies for joint county and city planning within urban growth areas;

- [to table of contents](#)
- [previous chapter](#)
- [next chapter](#)
- [endnotes](#)

- g) Policies for countywide economic development and employment, which must include consideration of the future development of commercial and industrial facilities; and
- h) An analysis of the fiscal impact.

Inter-local agreements are utilized between jurisdictions to implement Countywide Planning Policies. Inter-local agreements can establish development standards within UGAs, provision of urban services, annexation procedures, and siting of public facilities and transportation facilities.

Counties and cities are also required to make capital budget decisions consistent with their comprehensive plans¹³⁵.

Each county and city that is required or chooses to plan under RCW 36.70A.040 shall perform its activities and make capital budget decisions in conformity with its comprehensive plan.

RCW 36.70A.130 also requires that development regulations, like comprehensive plans, be subject to continuing review and update at least every eight years. Some recent amendments to the GMA that also requires implementation, includes the following statutes:

- RCW 36.70A.200 allows counties and cities to include a process for siting essential public facilities in their development regulations.
- RCW 36.70A.530 requires that development regulations prevent development in the vicinity of military installations that is incompatible with the installation's ability to carry out its mission requirements. In tandem with this statute is RCW 36.70A.510 and RCW 36.70.547 for general aviation airports, requiring development regulations to discourage siting of incompatible uses adjacent thereto.
- Adopted by the Legislature in 2010, RCW 36.70A.695 requires counties and cities to amend their development regulations to allow electric vehicle infrastructure.
- GMA statutes, together with locally adopted policies and agreements, direct that comprehensive plan goals and policies be implemented with development regulations and other related land use controls or techniques.

Helpful Guidance from the Washington Administrative Code

Commerce updated the Washington Administrative Code (WAC) for the GMA in 2010 with new sections added to provide guidance on implementation. The following guidelines describe how to implement a comprehensive plan's goals and policies:

WAC 365-196-650 Implementation strategy¹³⁶

This section of the WAC provides direction for counties and cities to develop a strategy for implementing its comprehensive plan for both regulatory and non-regulatory measures. The strategy should identify the development regulations needed (regulatory) and the actions for both acquiring and spending funds to implement the Plan (non regulatory).

A wide variety of development regulations can be utilized to implement the goals and policies of comprehensive plans. Zoning codes for example, classify land into specific zones with corresponding uses and standards for lot size, setbacks, size, height, and density. Other regulations address environmental protection, urban design, affordable housing, landscaping and parking, signage, services, concurrency, and public facilities. Methods for applying these regulations can occur through the permitting process, licenses, franchises, or contracts. Processes used to apply development regulations can occur through permit application procedures, hearings, and timeframes for approval deadlines and appeals.

The strategy selected by a county or city for implementing its comprehensive plan should: identify all the regulations used to implement the plan; list an adoption or amendment schedule; be in writing; be available to the public; and send a copy of the implementing strategy to the Department of Commerce for review.

An implementation strategy assures that policies are carried out as well as measured periodically, to determine the effectiveness of comprehensive plan goals and policies.

WAC 365-196-800 Relationship between development regulations and comprehensive plans¹³⁷

This section of the WAC provides that development regulations are specific controls placed on development or land use activities by a county or city and must be consistent with and implement the county or city's comprehensive plan adopted pursuant to the GMA. Further, implement means more than merely being consistent, but also of sufficient scope to carry out the goals and policies of the plan.

- [to table of contents](#)
- [previous chapter](#)
- [next chapter](#)
- [endnotes](#)

WAC 365-196-810 Review for consistency when adopting development regulations¹³⁸

This section of the WAC provides guidance to counties or cities to ensure that when adopting development regulations or amendments thereto, the proposed amendment is consistent with and implements the comprehensive plan. In addition, a finding in the adopting ordinance should be made to this effect.

Growth Management Hearings Board Cases

The following selected case summaries are reprinted from Growth Management Hearings Board digests. These cases address how jurisdictions implement their Comprehensive plan goals and policies. Full texts of cases may be obtained from the Hearings Board website at www.gmhb.wa.gov

The decision-making regime under GMA is a cascading hierarchy of substantive and directive policy, flowing first from the planning goals to the policy documents of counties and cities (such as CPPs, IUGAs and comprehensive plans), then between certain policy documents (such as from CPPs to IUGAs and from CPPs and IUGAs to comprehensive plans), and finally from comprehensive plans to development regulations, capital budget decisions and other activities of cities and counties. [Aagaard, 94-3-0011c, FDO, at 6.]

Plans provide policy direction to land use decision-making by providing guidance and direction to development regulations, which must be consistent with and implement the Comprehensive plan. In turn, these development regulations govern the review and approval process for development permits. [Citations omitted.] [Bremerton II, 04-3-0009c, FDO, at 15.]

RCW 36.70A.130 requires that any amendments to DRs shall be consistent with and implement the CP. Achen v. Clark County 95-2-0067 (Compliance Order, 12-17-97)

Implementing DRs are distinct from consistency DRs. Implementing DRs are defined at WAC 365-195-800¹³⁹. There must not only be a lack of conflict but the regulations must be of sufficient scope to carry out fully the goals, policies, standards and directions contained in the CP. CMV v. Mount Vernon 98-2-0006 (FDO, 7-23-98)

Ambiguous and nondirective CP policies that fail to encourage development in urban areas or reduce sprawl and maps that are generalized and in many cases inaccurate in the designation of UGAs, did not comply with the Act. A CP must include objectives, principles and standards that are directive. DRs are to be consistent with and implement the CP and may not be used as a mechanism to automatically amend the CP or render it meaningless. Under the record in this case petitioner's burden of showing substantial interference with the goals of the Act has been satisfied. Butler v. Lewis County 99-2-0027c (FDO, 6-30-00)

The mandatory and optional elements of a comprehensive plan must be consistent; the policies within the various Plan elements must work together, in harmony, and must not thwart each other. Although the Plan identifies and designates future land uses, the Plan itself does not directly regulate land use. However, the Plan is required to be implemented. The Plan is implemented through various methods, such as development regulations (e.g. zoning maps and code and other land development controls), and other implementing techniques, such as fiscal measures contained in a jurisdiction's capital expenditure program for infrastructure or road improvements or land acquisitions. Within many Plan elements an inventory and assessment of present conditions and needs must be discussed and identified. The ways to meet the identified needs must then be expressed in the form of map designations and policy statements. These policy statements and goals establish the jurisdiction's strategy and specific actions to be taken to meet the identified needs. The Plan describes, graphically and in policy statements, a desired future outcome for a planning city or county. The Plan also establishes, through map designations and policy statements, the basis and direction to achieve that desired future outcome. The Plan's future land use map designations indicate where certain land uses outcomes are desired, the Plan's policy statements, objectives and goals indicate how those outcomes are to be achieved. [LIHI I, 00-3-0017, 2/21/02 Order, at 5-6.]

The Comprehensive plan establishes the County's policy and goals for the management of growth and their compliance with the Growth Management Act. Development regulations are to be adopted to implement those policies and goals. These regulations must be consistent with the Comprehensive plan (RCW 36.70A.040). Harvard View Estates, v. Spokane County, EWGMHB Case No. 02-1 0005, FDO, (July 29, 2002).

At the heart of the GMA is the concept of looking ahead and planning for the future. Joint planning with other jurisdictions and an updated capital facilities plan ensure concurrency for public facilities and services in the future and are key components to implementing the goals and policies of the GMA. In the first section of the

- [to table of contents](#)
- [previous chapter](#)
- [next chapter](#)
- [endnotes](#)

GMA, RCW 36.70A.010, the legislature found that uncoordinated and unplanned growth “pose a threat to the environment, sustainable economic development, and the health, safety, and high quality of life enjoyed by residents of this state.” Joint planning coordinates growth throughout the County, and a detailed, updated CFP is vital to good planning within a jurisdiction. (Board emphasis). *Moitke/Neighborhood Alliance of Spokane v. Spokane County, et al.*, EWGMHB Case No. 05-1-0007, FDO (Feb. 14, 2006).

It is important the Petitioner understand that the challenged Ordinance is an implementing development regulation. It is not a *de facto* amendment to the City Center Plan; it merely is one of the means the City has chosen to implement the Plan. Nonetheless, implementing development regulations must be consistent with [it must work together to achieve a common goal and cannot thwart, or work against achieving a common goal], and implement the City Center Plan. . . . The guidance provided by Plans is not limited to providing direction to development regulations. Plans can also be implemented through direct public investment in public infrastructure, such as roads, sewer and water systems. Tax incentives or other incentive-based approaches can also be instrumental in implementing a Plan. Land use plans can be implemented through public acquisition or outright purchase of land, or partially through purchase or development rights. In short, each of these implementation approaches can contribute to carrying out the common goals set forth in the Plan. Often multiple approaches are set out in Plans to allow flexibility in achieving common goals. Petitioner is mistaken in contending that the challenged regulatory ordinance, or a regulatory approach alone, is the primary means by which the City will implement its ambitious City Center Plans. It is reasonable to expect there will be numerous regulatory changes, studies, incentive programs and acquisitions, funded by various means over substantial periods of time, to accomplish the City Center Plan goals. [Pirie, 06-3-0029, FDO, at 22-29.]

The BLR¹⁴⁰ is not intended to be a comprehensive market feasibility study, a predictor of the economic climate in the future, or source for identifying parcels ripe for development. The BLR is a tool for monitoring policy outcomes – it looks back, not forward, to see if the policies embodied in a jurisdiction’s Plan and implementing development regulations are being achieved. The BLR simply provides information about prior development activity that may influence future decision-making. [S/K Realtors, 04-3-0028, FDO, at 18.]

RCW 36.70A.215(4) requires that reasonable measures must be reasonably likely to increase consistency during the subsequent five-year period, with a jurisdiction annually monitoring the measures to determine their effect

so as to make necessary adjustments. From this provision two distinct evaluation requirements can be drawn: (1) adoption and implementation of “reasonably likely” measures and (2) annual monitoring. Therefore, the Board concludes that the GMA requires both pre-adoption (will the measure work) and post-adoption (has the measure actually worked) evaluation of adopted reasonable measures. The pre-adoption analysis does not equate to a 100 percent guarantee but rather a threshold determination that there is a probability of occurrence, or something more than mere speculation. [Suquamish II, 07-3-0019c, FDO, at 54.]

Local Examples

Example 1: City of Redmond

The City of Redmond annually tracks the City’s progress on achieving its Comprehensive Plan goals and policies with the “Redmond Community Indicators” report. The 2012 report monitors trends to help assess the effectiveness of current policies and identifies actions the City plans to take implement its Comprehensive Plan. The report contains two sections:

1. Indicators: Monitor progress on meeting Redmond’s long range goals.
2. Implementation: Actions that are needed to carry out Comprehensive Plan goals and policies.

The City of Redmond Comprehensive Plan goals were adopted in the 2004 Plan and updated in 2011. The following community goals are the foundation for the Redmond Community Indicators report:

The City of Redmond’s “Choices” goal above, speaks in terms of equitable access to housing, transportation, stores and services. The 2012 Report “Choices” goal results are summarized as follows:

- ☐ **Conserve** agricultural lands and rural areas; protect and enhance the quality of the natural environment; sustain Redmond’s natural resources as the City continues to accommodate growth and development
- ☐ Retain and enhance Redmond’s distinctive **character** and high quality of life, including

- [to table of contents](#)
- [previous chapter](#)
- [next chapter](#)
- [endnotes](#)

an abundance of parks, open space, good schools and recreational facilities

- ☐ Emphasize **choices** and equitable access in housing, transportation, stores and services
- ☐ **Centers:** Support vibrant concentrations of retail, office, service, residential, and recreational activity in Downtown and Overlake
- ☐ **Commerce:** Maintain a strong and diverse economy, and provide a business climate that retains and attracts locally owned companies as well as internationally recognized corporations
- ☐ Provide opportunities to live a healthy lifestyle, enjoy a variety of community gathering places and celebrate diverse **cultural** opportunities
- ☐ Provide convenient, safe and environmentally friendly transportation **connections** within Redmond, and between Redmond and other communities for people and goods
- ☐ Cultivate a well-connected **community**, working together and with others in the region to implement a common vision for Redmond's sustainable future

“Housing. The City issued permits for 126 new single-family homes during 2011. The median single-family home size increased to 3,125 square feet from 3,010 square feet. Thirty-three new affordable homes were created through Redmond's affordable housing regulations. Redmond did not allocate any of its Housing Trust Fund dollars in 2011, but did so in early 2012. There were 0.70 residents per job in Redmond in 2010 (latest year available); achieving a better balance indicates that more people may live closer to work, and as a result, are able to reduce commuting needs and participate more in their community.”

Indicators for Housing Affordability, Housing Choice, Housing Trust Fund, and Ratio of Residents to Employees are organized under the “Choices” goal, together with the City's role in affecting the indicator's performance, an explanation of what was measured (i.e. baseline – observed – target measures), and the trend of the measures (i.e. up, down, no positive or negative trend).

The following pages show just one of the eight community goals listed above, “Choices” - with its indicators, benchmarks, and trends. The eight overarching goals provide the foundation

for [Redmond's Community Indicators 2012 report](#). The entire Redmond Community Indicators 2012 report is available on the City's website.

Monitoring, indicators, and benchmarks provide decision makers and citizens an important set of feedback, data, and facts on whether a community's goals and policies for land use, housing, capital facilities and utilities, transportation, economic development, parks and recreations are achieving the community's desired outcome.

Counties and cities need to know if they are meeting the targets set by their goals and policies for UGAs. Some key indicators can include: demographic data; environmental data; land use, development activity and density; new housing types and number of new units built; commercial and industrial development types and number of jobs created in commercial and industrial sectors; community health; transportation modes.

Data from these types of indicators should be monitored and measured against benchmarks to determine the performance of related UGA goals and policies.

Example 2: Thurston Regional Planning Council (TRPC)

Thurston County and its cities have joined together to adopt regional planning policies and benchmarks, and analyze their indicator data against local and regional benchmarks to determine how goals and policies are performing in Thurston County.

The Thurston Regional Planning Council (TRPC) is a 22-member intergovernmental board made up of local governmental jurisdictions within Thurston County, plus the Confederated Tribes of the Chehalis Reservation and the Nisqually Indian Tribe. The Council was established in 1967 under RCW 36.70.060, which authorized creation of regional planning councils. TRPC's mission is to "Provide Visionary Leadership on Regional Plans, Policies, and Issues."

The TRPC meets monthly to carry out regional planning and studies on transportation, GMA implementation, and environmental quality to address the region's growth related challenges. The following overview of the TRPC benchmarks program report provides a brief example of TRPC's efforts to inform and educate decision makers and citizens of regional statistics and trends, analysis and mapping products, to enable responsive local and regional policies that produce a healthy and balanced region. The complete [TRPC 2008 Regional Benchmarks program report](#) is available at the Council's website¹⁴¹.

- [to table of contents](#)
- [previous chapter](#)
- [next chapter](#)
- [endnotes](#)

Overview***The 2008 publication of Regional Benchmarks for Thurston County, Tracking***

Growth Management Policy Implementation stems from an effort on the part of local governments in Thurston County to monitor the region's progress toward meeting the 13 goals of the 1990 state Growth Management Act (GMA). This is accomplished by comparing actual trends in key indicators against benchmarks established in several overarching growth management areas: Land Use, Growth, Transportation, Economy, Environment, Water, and Housing Affordability.

The Regional Benchmarks Report has an important role to play in determining whether implementation of the Growth Management Act is occurring and achieving the desired results. Accurate information regarding the results of the policies in adopted comprehensive plans in the county is crucial. By tracking indicators at the regional level, local governments are provided with a regional perspective of what's happening, leading to improved regional coordination regarding growth management planning.

A particular effort has been made to make the information in the Benchmarks Report accessible to a wide variety of readers. A standard 2-page format has been developed for each benchmark to allow readers to easily review key data trends. For those who are interested in more detail, a wide variety of supporting data tables are provided as well, and many of these tables are updated annually in The Profile.

This report marks the fourth TRPC Regional Benchmarks Report, the first being published in 1996. The 2000 Regional Benchmarks Report was recognized for excellence in planning implementation when it received an

Honor Award from the American Planning Association and the Planning Association of Washington. The third report contained results from the first

Buildable Lands Analysis for Thurston County, and was used extensively by the Vision/Reality Task Force to develop: Understanding Public Vision and Marketplace Realities in the Thurston Region. This Fourth edition of the

Regional Benchmarks Report includes some of the benchmarks and indicators developed during the Vision/Reality process. A chapter has been added for water. The Buildable Lands chapter has been removed from the Report, and is now available as a separate document.

Chapter 3 of the 2008 TRPC Benchmarks Report specifically addresses UGA land use with the following related GMA Goals:

1. Urban growth. Encourage development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner.
2. Reduce sprawl. Reduce the inappropriate conversion of undeveloped land into sprawling, low-density development.

In addition to these GMA goals, the following countywide policies guide the concentration of urban growth within Thurston County UGAs:

Encouraging infill

- Phasing urban development outward from core areas
- Establishing mechanisms to ensure average residential densities are sufficient to accommodate the 20-year population projections
- Designate rural areas for low intensity, nonurban uses
- Requiring development to be configured so urban growth areas may eventually infill and become urban.

Benchmarks 1 - 6 are used by the TRPC for determining whether these GMA goals and countywide planning policies are being achieved for: urban density; growth in mixed use areas; density in infill areas and corridors; creation of small lots; growth in urban and rural areas; rural densities.

- [to table of contents](#)
- [previous chapter](#)
- [next chapter](#)
- [endnotes](#)

Possible “Outlooks” for Benchmarks



**sunny, overall
positive results**



**partly sunny /
partly cloudy**



**stormy, concerns
for the future**

Summary of Benchmarks

Benchmark 1: Urban Residential Densities Increase over Time

- ☐ Outlook: partly sunny/partly cloudy
- ☐ Assessment: Yes they have overall, but in the cities they have decreased slightly.

Benchmark 2: Urban Mixed-Use Areas Receive an Increased Share of

- ☐ Growth over Time
- ☐ Outlook: stormy, concerns for the future
- ☐ Assessment: Mixed-Use areas have had a decreasing share of overall growth compared to the last evaluation period.

Benchmark 3: Achieved Residential Densities in Infill Areas and Strategy

- ☐ Corridors Occur at Transit-Supportive Levels
- ☐ Outlook: stormy, concerns for the future

- Assessment: While achieved densities in infill areas and strategy corridors are higher than the overall achieved density, they were not high enough to support efficient transit.

Benchmark 4: The Percentage of Small Lots Created in Subdivisions in the

- Cities and UGAs Increases over Time
- Outlook: sunny, overall positive results
- Assessment: The percentage of small lots created in subdivisions has increased.

Benchmark 5: The Percentage of Growth in Urban Areas Increases over Time Compared to Rural Areas

- Outlook: partly sunny/partly cloudy
- Assessment: The share of housing in urban areas was decreasing, however in the last two years urban areas have seen an increased share in housing.

Benchmark 6: Rural Densities Decrease over Time

- Outlook: sunny, overall positive results
- Assessment: Rural densities have decreased over time.

Benchmark 7: The Share of Drive-Alone Commute Trips at Large Work Sites

- Decreases over Time
- Outlook: partly sunny/partly cloudy
- Assessment: The share of drive-alone commute trips at large work sites has decreased somewhat since 1993. However, this reduction is significantly below the 35 percent reduction target set by the state.

Benchmark 8: The Number of Transit Trips Per Capita Increases or Remains

- Steady over Time

- to table of contents
- previous chapter
- next chapter
- endnotes

- ☐ Outlook: sunny, overall positive results
- ☐ Assessment: Transit trips per person have increased in recent years due to an expansion in Intercity Transit's service area after several years of cuts.

Benchmark 9: Vehicle Miles Traveled (VMT) Per Capita Decreases over Time

- ☐ Outlook: partly sunny/partly cloudy
- ☐ Assessment: Vehicle miles traveled per capita has increased in recent years, however changes are slight.

Benchmark 10: Real Wages Increase over Time

- ☐ Outlook: sunny, overall positive results
- ☐ Assessment: Since 1990, real wages have increased in Thurston County.

Benchmark 11: Unemployment Rate Declines or Remains Steady

- ☐ Outlook: sunny, overall positive results
- ☐ Assessment: Thurston County's unemployment rate rose steadily between 1999 and 2002, but has declined every year beyond 2003. The County has had a lower unemployment rate than that of the State since 1990.

Benchmark 12: The Amount of Land Designated to Parks and Preserves per Capita Remains Constant or Increases

- ☐ Outlook: partly sunny/partly cloudy
- ☐ Assessment: Since 1991, the amount of parks and preserves per capita has been increasing or remained steady in the incorporated areas, but has been decreasing overall.

Benchmark 13: Acres of Open Space Land Enrolled in the Open Space Tax Program Increase or Remains Steady over Time

- ☐ Outlook: sunny, overall positive results
- ☐ Assessment: The amount of open space land enrolled in the open space tax program has been generally increasing over time.

Benchmark 14: The Solid Waste Recycle Rate Per Capita Increases overTime

- ☐ Outlook: partly sunny/partly cloudy
- ☐ Assessment: The recycle rate per capita has been increasing steadily since 2001, however the solid waste entering the landfill per capita has also increased steadily over time.

Benchmark 15: Highest Annual Readings for Particulate Matter (PM10) Remain at or Below the National Standard of 150 Micrograms per CubicMeter

- ☐ Outlook: sunny, overall positive results
- ☐ Assessment: The highest annual reading for particulate matter has remained below the national standard since 1990.

Benchmark 16: Coho Salmon Production in the Deschutes River Increases or Remains Steady over Time

- ☐ Outlook: stormy, concerns for the future
- ☐ Assessment: Coho salmon smolt production in the Deschutes River has dropped over time.

Benchmark 17: Seven-day Minimum River Flows Increase or Remain Steady over Time

- ☐ Outlook: partly sunny/partly cloudy
- ☐ Assessment: Flows have been lower in the Deschutes River, but higher in the Chehalis and Nisqually Rivers than the recent historic records.

Benchmark 18: Shellfish Bed Health in Puget Sound Inlets Increases overTime

- ☐ Outlook: stormy, concerns for the future

- [to table of contents](#)
- [previous chapter](#)
- [next chapter](#)
- [endnotes](#)

- ☐ Assessment: Shellfish bed water quality has decreased over time in Henderson Inlet and the Nisqually Reach.

Benchmark 19: Marine Water Quality Health Improves over Time

- ☐ Outlook: stormy, concerns for the future
- ☐ Assessment: There remains a very high level of concern over water quality in Budd Inlet, and a high level of concern for Nisqually Reach.

Benchmark 20: Median Household Income Keeps Pace with Average Housing Sale Price

- ☐ Outlook: stormy, concerns for the future
- ☐ Assessment: In the last five years, the rise in home costs has outpaced the rise in median household income.

Benchmark 21: The Housing Affordability Index for First Time Buyers Increases and the Affordability Index for All Buyers Remains Above 100

- ☐ Outlook: partly sunny/partly cloudy
- ☐ Assessment: The housing affordability index has remained above 100 for all buyers, but has been decreasing lately. It was increasing for first time buyers until 2004, when it began to decrease steadily.

Benchmark 22: The Apartment Vacancy Rate Remains at or Around Five Percent

- ☐ Outlook: sunny, overall positive results
- ☐ Assessment: The apartment vacancy rate in Thurston County has remained at or around five percent.

180

The City of Redmond and the Thurston Regional Planning Council (TRPC) are good examples of jurisdictions that utilize development regulations, inter-local agreements, capital improvement programs, budgets, and other innovative tools and techniques to implement comprehensive plan goals and policies for UGAs.

Both Redmond and the TRPC have on-going programs to measure the performance of their respective goals and polices with local indicators, monitoring, and analysis of whether indicators are aligning with desired benchmarks. Results from these types of programs yield accurate and reliable performance data that supports policy making to achieve each community’s desired future.

- [to table of contents](#)
- [previous chapter](#)
- [next chapter](#)
- [endnotes](#)

Other Examples of Implementation – Monitoring – Benchmarking

Clark County	Monitoring and Implementation ¹⁴²
King County	Benchmark Program ¹⁴³
City of Cheney	Implementation Element ¹⁴⁴
Skagit County	GMA Indicators Program ¹⁴⁵
City of Port Orchard	Implementation Element ¹⁴⁶
Spokane Community Indicators Initiative	Community Indicators ¹⁴⁷
Oregon Metro	2040 Performance Measures ¹⁴⁸

Endnotes

¹²⁶ RCW 36.70A.070

¹²⁷ RCW 36.70A.080

¹²⁸ 39.108 RCW

¹²⁹ RCW 36.70A.085

¹³⁰ RCW 36.70A.040

¹³¹ RCW 36.70A.210

¹³² City of Edmonds, 2004

¹³³ RCW 36.70A.030(7)

¹³⁴ RCW 36.70A.115

¹³⁵ RCW 36.70A.120

¹³⁶ <http://apps.leg.wa.gov/WAC/default.aspx?cite=365-196-650>

¹³⁷ <http://apps.leg.wa.gov/WAC/default.aspx?cite=365-196-800>

¹³⁸ <http://apps.leg.wa.gov/WAC/default.aspx?cite=365-196-810>

¹³⁹ Adopted as WAC 365-196-800, 2010.

¹⁴⁰ Buildable Land Program requirement, RCW 36.70A.215

¹⁴¹ <http://www.trpc.org/regionalplanning/landuse/Pages/2008RegionalBenchmarks.aspx>

¹⁴² http://www.clark.wa.gov/planning/comp_plan/monitoring.html#implementation

¹⁴³ <http://www.kingcounty.gov/exec/PSB/BenchmarkProgram.aspx>

¹⁴⁴ <http://www.cityofcheney.org/index.php?section=long-range-planning>

¹⁴⁵

<http://www.skagitcounty.net/Common/asp/default.asp?d=PlanningAndPermit&c=General&p=GMI.htm>

¹⁴⁶ <http://www.cityofportorchard.us/comprehensive-plan>

¹⁴⁷ <http://www.communityindicators.ewu.edu/index.cfm>

¹⁴⁸ <http://www.oregonmetro.gov/index.cfm/go/by.web/id/13104>

- [to table of contents](#)
- [previous chapter](#)
- [next chapter](#)
- [endnotes](#)

Appendix A: State Environmental Policy Act (SEPA)

Integrating the SEPA and the GMA¹⁴⁹

SEPA requires all state and local agencies to use an interdisciplinary, integrated approach to include environmental factors in both planning and decision-making. Although the terms "SEPA review" and "environmental review" include formal SEPA determinations and environmental analyses, these terms also refer to the basic concept of taking environmental quality into account in whatever an agency does.

Under GMA, cities and counties adopt policies, plans, and regulations to manage land use, environmental resources, and other aspects of growth within their own jurisdictions, and in a coordinated way with other jurisdictions. It is not possible to meet the goals or requirements of GMA or to make informed planning decisions without giving appropriate consideration to environmental factors. The GMA non-project actions such as the adoption of policies, plans, and regulations form the basis for subsequent "on the ground" project decisions that directly affect our environment.

Environmental review at the planning stage allows the GMA city or county to analyze impacts and determine mitigation system-wide, rather than project by project. This allows cumulative impacts to be identified and addressed, and provides a more consistent framework for the review, conditioning, or denial of future projects.

Plans that effectively integrate the goals and requirements of SEPA and GMA contribute to public knowledge, environmental protection, and fiscal efficiency for local government services. Benefits include:

- A more predictable future for the community;
- A better understanding of the capacity of the built and natural environment and the cumulative impacts of development community-wide, increasing the potential for protection of environmental values

- Efficient use of public funds for the provision of public facilities, infrastructure, and services; and
- A decrease in the time and cost associated with obtaining permit approval for appropriate projects in suitable locations resulting from early decisions on land-use, services, and mitigation.

To the extent that plans and implementing regulations are more comprehensive, detailed, and consistently relied upon, environmental review for individual project proposals can be reduced. Environmental review at the project phase entails 1) determining the project's consistency with the comprehensive plan, development regulations, and other local, state, and federal laws; and 2) using SEPA to address the gaps that may remain, by focusing on any project-specific environmental impacts not addressed under other regulations.

Formal SEPA documents issued by GMA jurisdictions for both project and non-project proposals serve three purposes:

1. To document the consideration of environmental values;
2. To provide public, agency, and tribal review and comment prior to many agency decisions; and
3. To ensure coordination among the policies, plans, and regulations of various governments.

Principles for Integrating SEPA and GMA

The integration of SEPA and GMA results in improved planning and project decisions from the environmental prospective. Just as GMA goals cannot be addressed without consideration of environmental factors, the goals of SEPA are benefited by the examination of the "big picture" and identification of mitigation to address cumulative impacts of development that occurs during GMA planning. Jurisdictions planning under GMA should:

- Think about environmental quality as each community charts its future, by involving diverse sectors of the public and by incorporating early and informal environmental analysis into GMA planning and decision-making.
- Use SEPA review together with other analyses and public involvement to produce better planning decisions.

■ [to table of contents](#)
 ■ [previous chapter](#)

- Combine to the fullest extent possible the processes, analysis, and documents required under GMA and SEPA, so that GMA planning decisions and subsequent implementation will incorporate measures to promote the goals of GMA and SEPA.
- Recognize that different questions will need to be answered and different levels of detail will be required at each phase of GMA planning, from the initial development of plan concepts or elements to the creation of implementation programs.
- Focus environmental review and the level of detail needed for different stages of plan and project decisions on the environmental choices most relevant to that stage of the process, while not duplicating the review that has occurred for decisions that have already been made.
- Use environmental review on projects to help: 1) review and document consistency with GMA plans and regulations; 2) identify any impacts and mitigation needs that had not been considered and addressed at the plan level; and 3) provide the opportunity for review by agencies, tribes, and the public.
- Continue to maintain or improve the quality of environmental analysis for both plan and project decisions, while integrating these analyses with improved state and local planning and permitting processes.

GMA Non-Project Review

In 1995, the SEPA Rules were amended to help cities and counties combine SEPA and GMA processes and analyses, including issuing combined SEPA/GMA documents [WAC 197-11-210 through 235]. These amendments affirmed that environmental review should begin at the early stages of plan development in order to ensure that early studies are available and useful throughout the planning and environmental review process [WAC 197-11-030(2)(d)]. Planning and decision-making under GMA is best done concurrently with environmental analysis under SEPA.

Environmental analysis at each stage of the GMA planning process should, at a minimum, address the environmental impacts associated with planning decisions at that stage of the planning process. Impacts associated with later planning stages may also be addressed to the extent that sufficient information is known for the analysis to be meaningful.

Early (Preliminary) Environmental Analyses

Cities and counties are encouraged to integrate informal environmental analysis into preliminary planning considerations. These preliminary analyses can be prepared and used early in the process and may also be incorporated into later analyses. Early environmental analyses:

- Do not require a threshold determination;
- May be separate documents or included as part of other planning materials such as issue papers;
- May use the format of SEPA documents (e.g. environmental checklist, EIS); and
- May evaluate issues and concerns not required in SEPA documents such as economic or technical factors [WAC 197-11-232].

Timing of the Threshold Determination

A SEPA threshold determination is made:

- As soon as it can be determined whether a significant adverse environmental impact is likely to result from the implementation of the GMA action; or
- At any time, as long as it is early enough that the appropriate environmental document can accompany or be combined with a proposed GMA action [WAC 197-11-230].
- When using existing documents for which a previous threshold determination has been prepared and there are substantial changes or new information indicating significant impacts not previously analyzed [WAC 197-11-230 and 600].

A threshold determination is not required when:

- There has been a previous threshold determination on the proposal and there are no substantial changes or new information indicating significant impacts not previously analyzed; or
- A notice of adoption or an addendum is being prepared [WAC 197-11-230 and 600] (except when required by WAC 197-11-600(3)).

■ [to table of contents](#)
 ■ [previous chapter](#)

Expanded Scoping

Expanded scoping may be used for integrated documents without requiring the preparation of an EIS. Expanded scoping may begin or be combined with early GMA planning activities such as "visioning," development of alternative concepts or elements, or scoping of possible GMA actions.

Expanded scoping may be started before a threshold determination. A scoping notice may be issued separately from or without a threshold determination. If expanded scoping is used before making a threshold determination and a determination of significance (DS) is subsequently issued, additional scoping is optional [WAC 197-11-232(2)].

Issuing and Distributing an Integrated Document

A formal SEPA document must be issued no later than when a proposed GMA action is issued for public review. For comprehensive plans and development regulations, it is issued at least sixty days before final adoption.

The public comment period on a formal SEPA document issued with a GMA document is the longer of:

- The comment period on the GMA action; or
- The comment period typically required for a SEPA document.

The document must be distributed to:

- The Department of Ecology;
- Any advisory body that makes a formal recommendation to the local legislative body regarding a GMA action;
- The legislative body that will consider a GMA action;
- Agencies, affected tribes, and citizens as mandated by WAC 197-11-455 (draft EIS) or 197-11-340 (DNS), as appropriate [WAC 197-11-230(1)(b)(ii)]; and
- The Department of Commerce and other state agencies pursuant to RCW 36.70A.106.

Adopting the GMA Document

When a GMA document is integrated with a draft EIS, the agency may adopt the GMA document at the same time that the final EIS is issued. The jurisdiction does not have to wait the seven days usually required. In other instances, the GMA document may be adopted after any required comment period is completed.

Integrated Document Format

Although there are a few requirements, which are defined below, there is no standard format for an integrated GMA document. The overriding consideration is the quality of information and analysis at the appropriate scope and level of detail for the particular GMA document and not the format, length, or bulk of the document [WAC 197-11-235].

An EIS for a GMA action should contain sufficient environmental analysis to provide a basis for future decisions on projects. SEPA documents may be separate and accompany the GMA documents or they may be integrated. An integrated document must include:

A fact sheet. The fact sheet, containing the information required in WAC 197-11-440(2), must be the first section of the document.

An environmental summary.

The environmental summary emphasizes the major conclusions, significant areas of controversy and uncertainty, if any, and the issues to be resolved including the environmental choices to be made and the effectiveness of mitigation measures. It should reflect SEPA's substantive policies and highlight the primary environmental options that would be preserved or foreclosed by the proposed GMA action, taking into account cumulative impacts. It may discuss non-environmental factors, and should do so if relevant to resolving issues concerning the main environmental choices [WAC 197-11-440(4) and 235(5)].

A concise analysis of alternatives.

This is a comparative environmental analysis of the principal alternative courses of action that are under consideration [WAC 197-11-440(5)]. Evaluating options helps determine whether the proposal should be revised to avoid or reduce environmental or other impacts. Alternatives discussed may be those presently being considered or considered and discarded earlier.

- [to table of contents](#)
- [previous chapter](#)

Comments and responses.

The final integrated document must include the comments on the draft EIS/plan along with agency responses. Any comments received during the scoping process or on preliminary documents (or a summary of them) must be included in either the final integrated document or the supporting record, together with agency responses to these comments if prepared [WAC 197-11-235(7)].

Supporting record, analyses, and materials. Materials in the supporting record allow interested parties to identify and review the planning basis for the conclusions and analyses presented in the integrated GMA document as provided in Chapter 365-195 WAC, "Procedural Criteria for Adopting Comprehensive Plans and Development Regulations. An integrated document must contain a list of the principal analytical documents and other materials (such as meeting minutes, maps, models, tapes or videos) that have been prepared, received, or used to develop the GMA action. These materials are part of the official supporting record for SEPA compliance (see WAC 197-11-090). Annotated lists are encouraged, but not required, to assist current and future reviewers.

Non EIS Integrated Documents

If a proposed GMA action is not likely to have a significant adverse environmental impact, an integrated GMA document that combines the formal SEPA document (such as an environmental checklist/DNS, a notice of adoption, or an addendum) with the GMA document is prepared.

If an environmental checklist is prepared for a GMA action, only Parts A (which serves as a fact sheet), C (responsible official's signature), and D (non-project checklist) must be completed. An environmental summary as specified in WAC 197-11-235(5) is also required and may be combined with Part D of the checklist.

If an addendum is to accompany or be incorporated into an integrated GMA document, it must contain the information specified in WAC 197-11-235(5) for an environmental summary.

GMA Project Review

The Local Project Review Act, adopted in 1995, added new requirements for cities and counties to consolidate their permit and environmental review processes. Included are many procedural mandates for those cities and counties planning under GMA.

Planned Actions

In 1995, the legislature authorized a new category of project action in SEPA called a "planned action." Designating specific types of projects as planned action projects shifts environmental review of a project from the time a permit application is made to an earlier phase in the planning process. The intent is to provide a more streamlined environmental review process at the project stage by conducting more detailed environmental analysis during planning. Early environmental review provides more certainty to permit applicants with respect to what will be required and to the public with respect to how the environmental impacts will be addressed.

The GMA city or county must first complete an EIS which addresses the likely significant adverse environmental impacts of the planned action. After completing the EIS, the GMA city or county designates by ordinance or resolution those types of projects to be considered planned actions, including mitigation measures that will be applied. The types of project action must be limited to certain types of development or to a specific geographic area that is less extensive than a city or town's jurisdictional boundaries. (See RCW 43.21C.031, WAC 197-11-164 and 168 for requirements and restrictions on the designation of planned actions.)

Use of the planned action process is restricted to cities and counties planning under GMA. GMA jurisdictions are required to develop both a broader scope and deeper level of planning that provides the foundation for this early type of review.

While normal project review requires a threshold determination, a project qualifying as a planned action project does not require a new threshold determination. If the city or county reviews the project, verifies that it is consistent with the planned action project(s) previously designated, and determines that the impacts are adequately addressed in the EIS on which the planned action relies, project permit review continues without a threshold determination. All of the project's significant probable environment impacts must have been addressed at the plan level in order for the project to qualify as a planned action. [If a project does not qualify as a planned action because of likely significant adverse environmental impacts that were not adequately addressed in the EIS, a threshold determination is required. Environmental review for the project may rely on the environmental analysis in the EIS, and additional analysis need only address those impacts not addressed in the previous EIS.]

- [to table of contents](#)
- [previous chapter](#)

Designating planned action projects reduces permit-processing time. There are no SEPA public notice requirements or procedural administrative appeals at the project level because a threshold determination or new EIS is not required. The only notice requirements are those required for the underlying permit.

The designation of planned action projects will only be appropriate in limited situations. The designation of planned action projects is probably most appropriate for:

- Smaller geographic areas;
- Relatively homogenous geographic areas where future development types, site-specific conditions, and impacts can be more easily forecast;
- Development sites with significant overlapping regulatory requirements; or
- Routine types of development with few impacts.

Examples of appropriate project actions limited to a specific geographic area might be projects anticipated in a subarea or neighborhood plan with a limited number of development types. Another example could be a large parcel in single ownership, such as a university campus or a large manufacturing complex where project construction will be done in phases.

Tip

When considering whether to designate planned action projects, GMA counties and cities need to be aware that the process can be costly to the jurisdiction. More up-front environmental analysis and review by the county or city in the GMA planning process will be required. As a result, the county or city pays for studies and processes that would normally be paid for by private applicants. [Although there is no formal method under state law to recover the costs of up-front analysis, some jurisdictions have developed cost-sharing agreements with local property owners and associations interested in utilizing the planned action process.]

Designing Planned Action Projects

The basic steps in designating planned action projects are to prepare an EIS, designate the planned action projects by ordinance or resolution, and review permit applications for projects proposed as consistent with the designated planned action.

Step 1: Prepare the EIS (WAC 197-11-164)

The significant environmental impacts of projects designated as planned actions must be identified and adequately addressed in an EIS [WAC 197-11-164]. The EIS must be prepared for a GMA comprehensive plan or subarea plan, a master planned development or resort, a fully contained community, or a phased project [RCW 43.21C.031].

Planned action projects should only be designated when a county or city can reasonably analyze the site-specific impacts that will occur as a result of the types of projects designated, and can adequately address those impacts in the EIS.

A generalized analysis of cumulative environmental impacts will not provide enough information to address a project's impacts when it is time for the jurisdiction to issue permits for specific projects proposed as planned action projects.

Step 2: Adopt Planned Action Ordinance or Resolution

Planned action projects must be designated or identified in an ordinance or resolution adopted by a GMA county or city [WAC 197-11-168]. There are a number of procedural requirements for this. A GMA county/city considering the adoption of a planned action ordinance or resolution should review the requirements in RCW 43.21C.031 and WAC 197-11-164, 168, and 315. The following specific points should be considered:

An extensive level of public review for both the EIS and the proposed planned action ordinance is crucial. Since a new threshold determination or EIS is not required when a permit application is received, there may not be an opportunity for public review or administrative appeal at the project review stage. In order to build support for an abbreviated permit process, public awareness is needed at these earlier phases.

Although the statute allows a jurisdiction to designate planned action projects by an ordinance or resolution, adoption by resolution is not recommended. The provisions for adoption of a resolution do not allow sufficient opportunity for public participation.

The planned action ordinance should be as specific as possible, should indicate where in the EIS or associated planning document the projects' environmental impacts have been addressed, and should include or reference mitigation measures which will be required for a project to qualify as a planned action project. For example, the ordinance should indicate what mitigation has been identified in the EIS or what level of service has been accepted in the subarea plan for traffic impacts.

- [to table of contents](#)
- [previous chapter](#)

If desired, the city or county may set a time limit in the ordinance during which the planned action designation is valid. If a GMA county/city does set a time limit on the designation, it should consider how this affects any permits for which there is an expiration date. For example, a project with a permit valid for five years is found to qualify as a planned action project and the permit is issued just prior to the sunset date for the planned action designation. Is the project still considered a planned action project for the life of the permit after the sunset date?

Although a GMA county or city must require the applicant to submit a SEPA environmental checklist with a project proposed as a planned action project, a revised format for the checklist may be developed by the city or county. A draft of the revised form must be sent to Ecology for a thirty-day review [WAC 197-11-315(2)]. While not required at this phase, it would be helpful if the revised checklist were developed in conjunction with the ordinance or resolution designating planned action projects.

Step 3: Review the Proposed Planned Action Project (WAC-197-11-172)

When a permit application and environmental checklist are submitted for a project that is being proposed as a planned action project, the city or county must verify:

- The project meets the description of any project(s) designated as a planned action by ordinance or resolution;
- The probable significant adverse environmental impacts were adequately addressed in the EIS; and
- The project includes any conditions or mitigation measures outlined in the ordinance or resolution.

If the project meets the above requirements, the project qualifies as a planned action project. Neither a threshold determination nor an EIS will be required. Consequently, there will be no administrative SEPA procedural appeal (an appeal of whether the proper steps in the SEPA process were followed). The planned action project will continue through the permit process pursuant to any notice and other requirements contained in the development regulations.

If the project does not meet the requirements of the planned action ordinance or resolution, or if the EIS did not adequately address all probable significant adverse environmental impacts, the project is not a planned action project. In this instance, the city or county must then make a threshold determination on the project.

The project would go through normal environmental review as part of project review. The county or city may still rely on the environmental information contained in the EIS and supporting documents in analyzing the project's environmental impacts and making the threshold determination. If an EIS or SEIS is found to be necessary for the project, it only needs to address those environmental impacts not adequately addressed in the previous EIS.

Consistency Requirements for Planned Action Projects

A project proposed as a planned action project must still be analyzed for consistency with the local comprehensive plan and development regulations. Designation of planned action projects does not limit a city or county from using other authority (e.g. transportation mitigation ordinances) to place conditions on a project; it only addresses procedural SEPA requirements. [WAC 197-11-172(2)(a) specifically states that "Nothing in this section limits a GMA county/city from using this chapter or other applicable law to place conditions on the project in order to mitigate non-significant impacts through the normal local project review and permitting process."] The GMA county or city may still use its SEPA substantive authority or other applicable laws or regulations to impose conditions on a project qualifying as a planned action project [RCW 43.21C.031(1)].

¹⁴⁹ Department of Ecology SEPA Handbook: <http://www.ecy.wa.gov/programs/sea/sepa/handbk.htm>

- [to table of contents](#)
- [previous chapter](#)

TO: General Government Committee
 FROM: Brad Medrud, Planning Manager
 DATE: September 13, 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 General Government Committee briefing is to present and discuss the current Housing Element and update guidance for the periodic update.

3) Policy Support:

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 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.

4) Alternatives:

☐ None.

5) Fiscal Notes:

This is primarily an internally funded work program task. The City has filed an application for a Washington State Department of Commerce grant funding to support the periodic update of \$125,000 and is preparing two Washington State Department of Commerce grant applications for funding to support addressing the new state missing middle housing requirements and the development of a Climate Element.

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
- H. Example - City of SeaTac Housing Element

STAFF REPORT

Date: September 13, 2023

To: General Government Committee

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 General Government Committee meeting on Wednesday, September 13, 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.

Contents

1. The Need	3
2. Requirements for the Housing Element Update	4
A. How All the Parts Are Related	4
B. Growth Management Act	4
1) Housing Goal	4
2) Requirements for Housing Elements	5
C. County-Wide Planning Policies – Affordable Housing	6
D. Other Related State Housing Laws	9
1) Washington Housing Policy Act	9
E. Sustainable Thurston Goals	9
3. Racially Disparate Impacts	10

4. Housing Action Plan	12
5. Current Housing Element.....	13
A. Background	13
B. Structure	14
C. Link to Current Housing Element.....	16
6. Schedule.....	16
Phase 1. Community Engagement (Summer 2023 – Fall 2023)	16
1) Gap Analysis	16
2) Data Collection.....	18
3) Schedule.....	18
4) Specific Topics Addressed as Part of the Update	19
Phase 2. Plan Development (Winter 2024 – Fall 2024)	21
1) Community Outreach	21
2) Schedule.....	21
Phase 3. Legislative Process (Fall 2024 – June 30, 2025).....	22
1) Community Outreach	22
2) Schedule.....	23
Appendix A. Resources and Guidance	24
1. City of Tumwater	24
2. State Department of Commerce.....	24
a) General Guidance	24
b) Housing Guidance.....	24
3. Puget Sound Regional Council	25
4. Municipal Research Services Center	25
5. Association of Washington Cities.....	25
Appendix B. Current Housing Goals, Policies, and Actions.....	26
1. Introduction	26
2. Policy Strength Continuum	27
3. Other Questions to Consider	27

4. Current Housing Element..... 28

Appendix C. WAC 365-196-410 Housing Element 35

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.

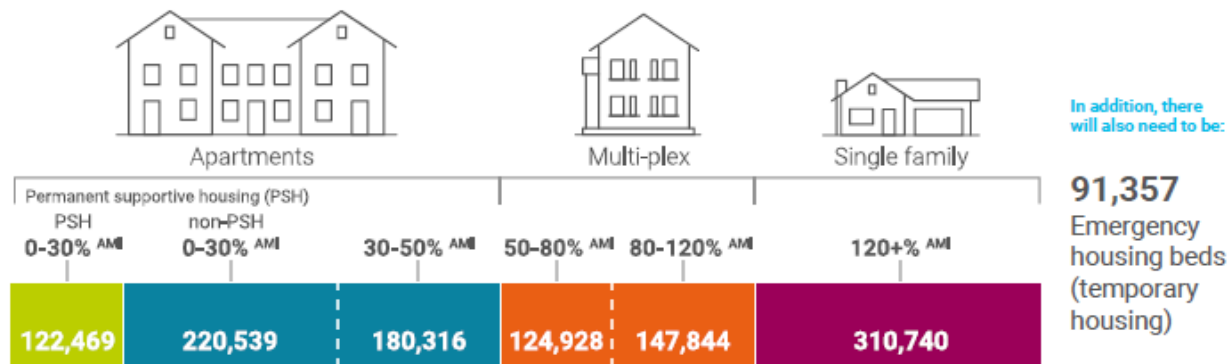


Figure 1. State Department of Commerce.

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%).

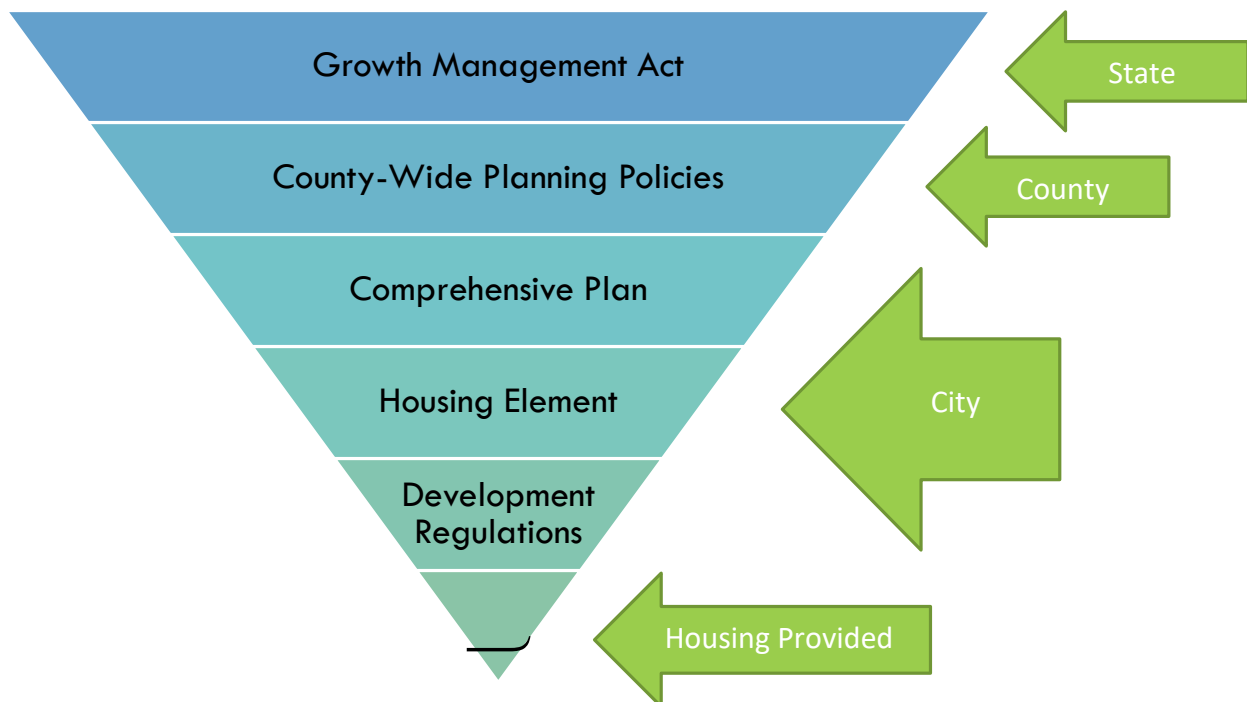
Other responses from survey respondents included:

- 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

1) 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.

2) 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.*

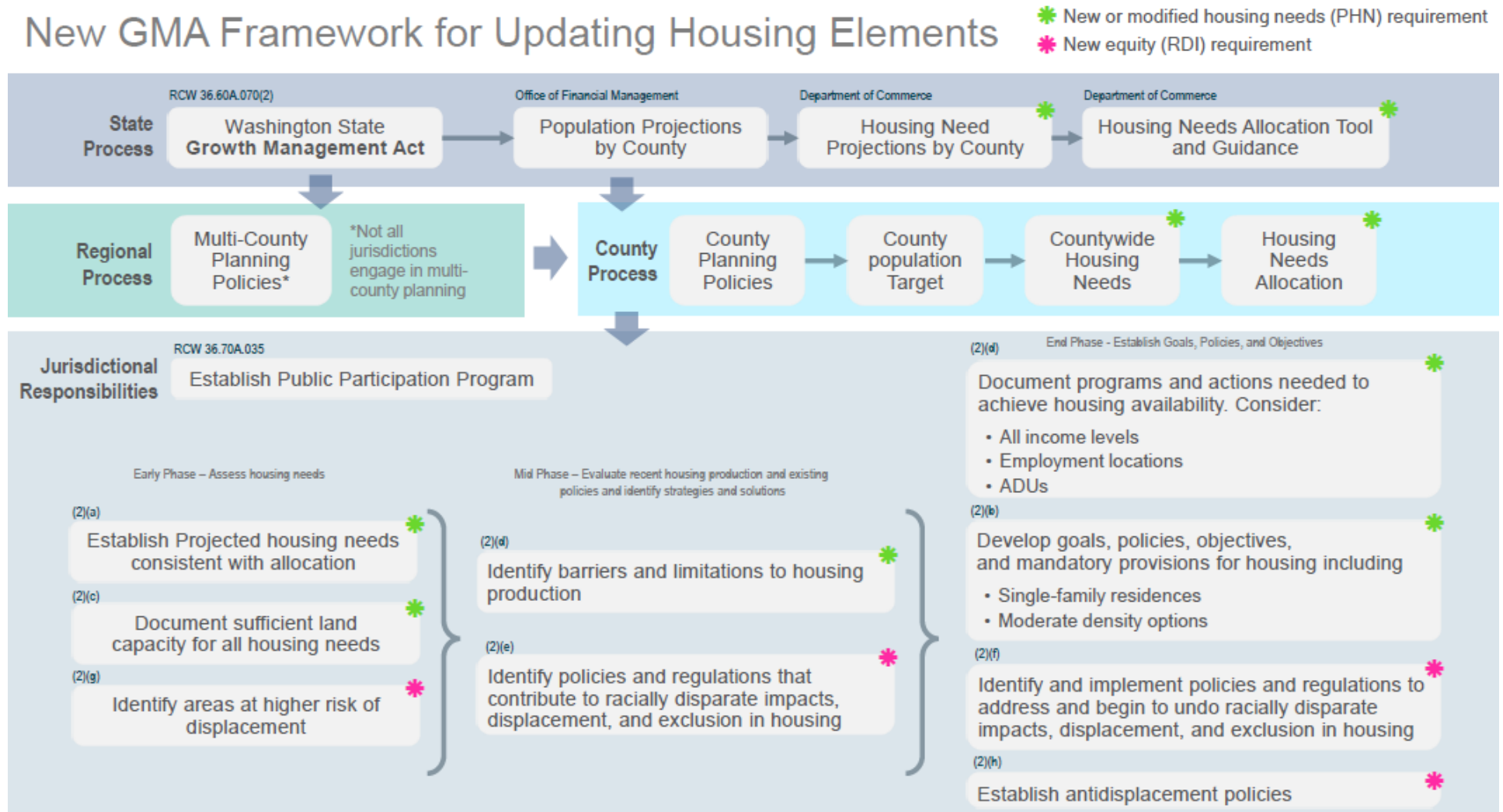


Figure 2. State Department of Commerce.

D. Other Related State Housing Laws

1) 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, under HB 1220 (2023) 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.

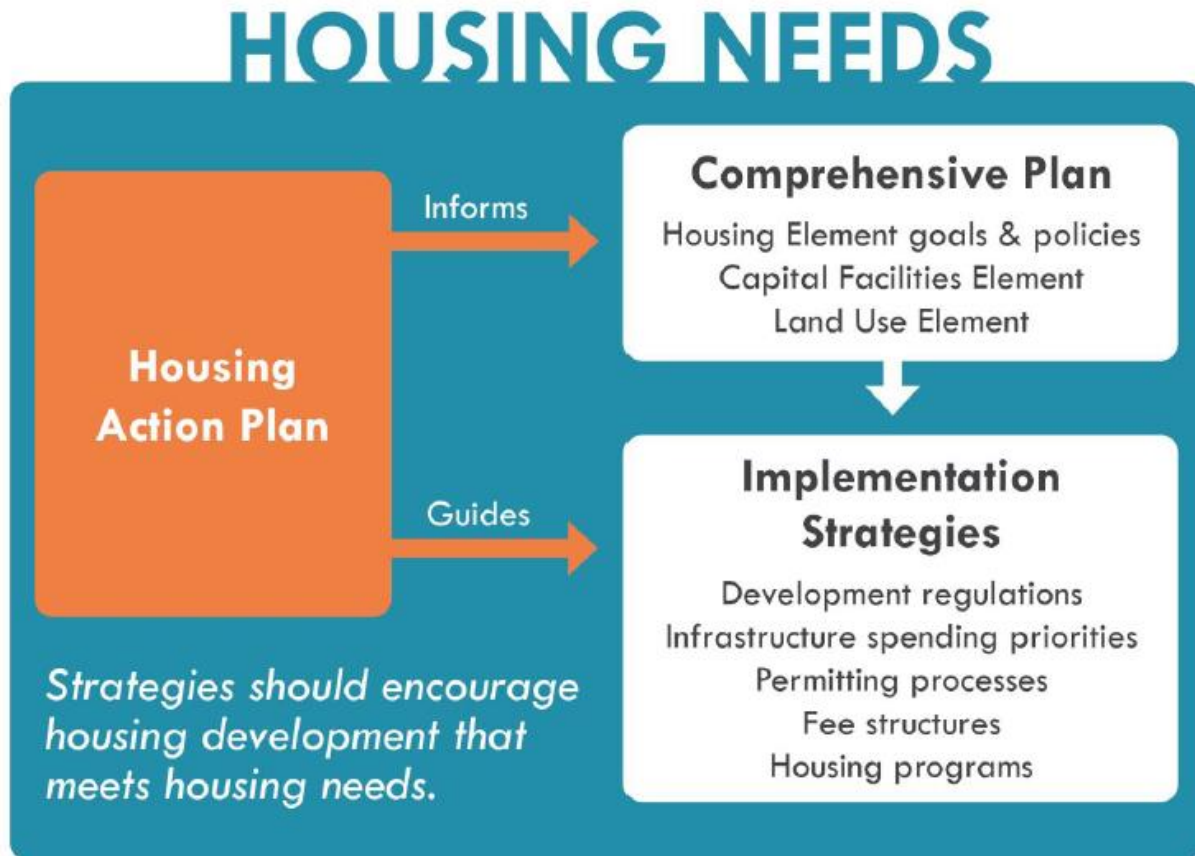


Figure 4. State Department of Commerce and BERK

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 Work Session
 - October 24, 2023
 - Joint City Council – Planning Commission Meeting
 - December 12, 2023
- Initial Housing Element Meetings – Goals, Policies, and Actions
 1. Planning Commission Work Sessions

- 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 Work Sessions
 - 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 work sessions 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 work sessions 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
 - Work Sessions
 - 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 Work Sessions
 - 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 has 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

The 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](#)

5. Association of Washington Cities

The Association of Washington Cities has prepared a series of short five to eight minute videos covering various a number of topics related to Comprehensive Plans from roles and responsibilities, budget, and economic development to implementation, and community engagement. Each video comes with a set of discussion questions.

<https://wacities.org/data-resources/gma-comp-plan-conversation-starters>

Appendix B. Current Housing Goals, Policies, and Actions

1. Introduction

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.

<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.

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.
- "Coordinate" means to bring into a common action, movement, or condition.
- "Implement" means to carry out or accomplish.
- "Integrate" means to form, coordinate, or blend into a functioning or unified whole.

- “Make” means to enact or establish.
- “Engage” means to do or take part in something.

2. Policy Strength Continuum

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.

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

For an example of how policies can be written to be more active and how implementation strategies can be established for policies, include identifying who will be responsible for implementing the policy and the timeframes to do so, see Attachment H Example - City of SeaTac Housing Element.

3. Other Questions to Consider

The Growth Management Act requirements related to addressing racially disparate impacts, displacement, and exclusion focus primarily on the update of the Housing Element. However, the Growth Management Act does require consideration of the effects of disinvestment and infrastructure availability for their contribution to racially disparate impacts (RCW 36.70A.070(2)(e)).

In addition, the Growth Management Act’s internal consistency requirements will lead to amendments to the Land Use, Lands for Public Purposes, and Utilities Element as well as the Transportation Plan, so they are consistent with the Housing Element.

The section “Step 3: Evaluate Policies”¹ of the State Department of Commerce’s Racially Disparate Impacts Guidance provides a recommended process for assessing goals and policies

¹ State Department of Commerce, Racially Disparate Impacts Guidance – Final (April 2023), pp. 33-41.

according to two lenses that both contribute to the policy impacts. The first lens focuses on actions the policies support or prohibit and the second lens focuses on the narrative effect of the policy and if furthers harmful biases about groups of people and communities.

4. 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.

<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.

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*

General Government Committee, September 13, 2023



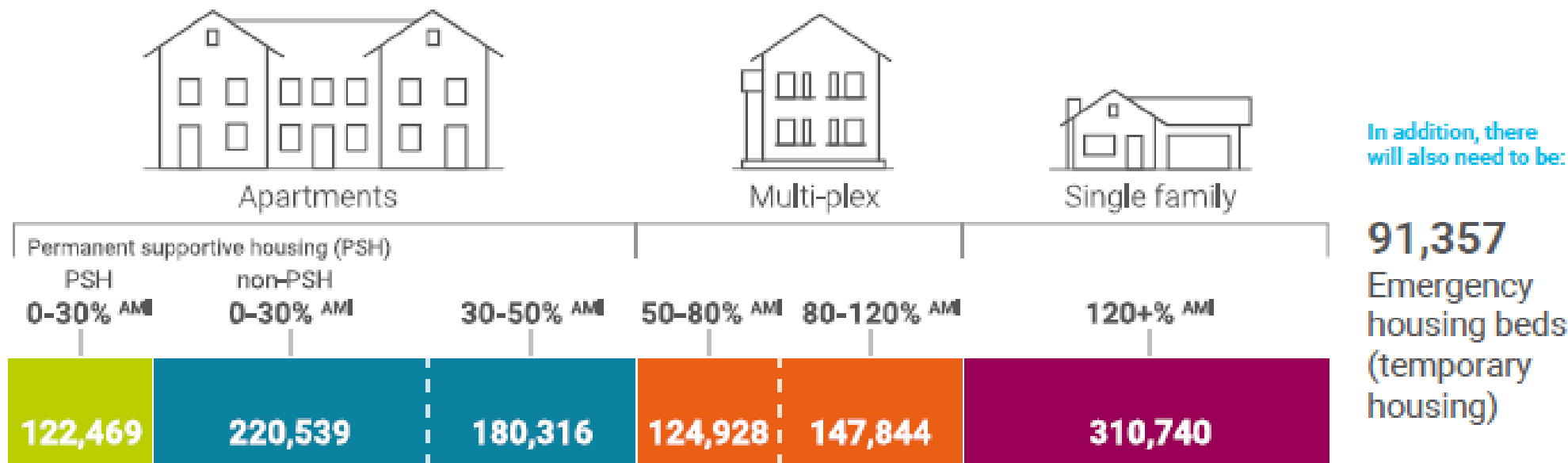
Intent

- 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



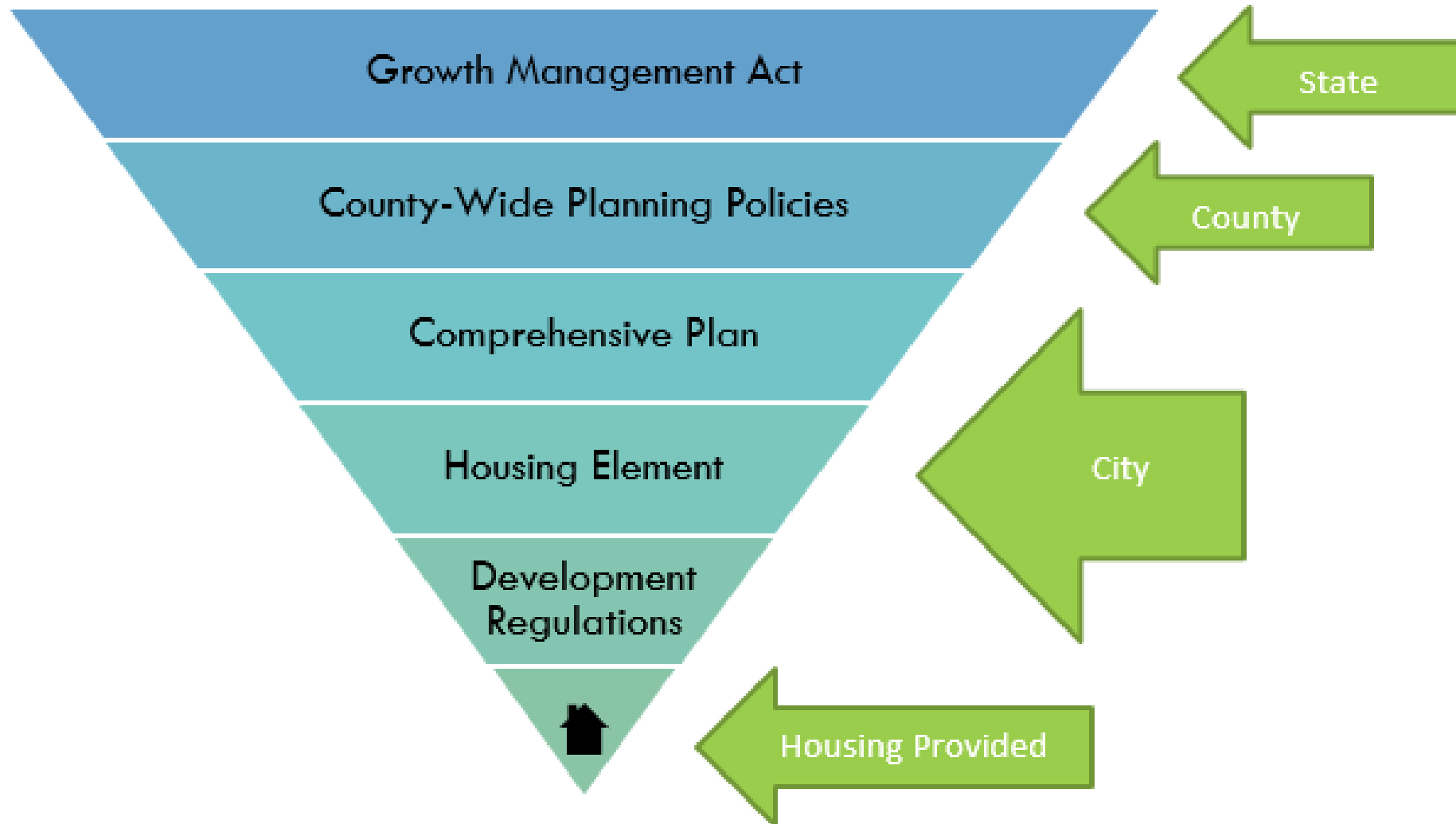
December 2022 State Housing Survey

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

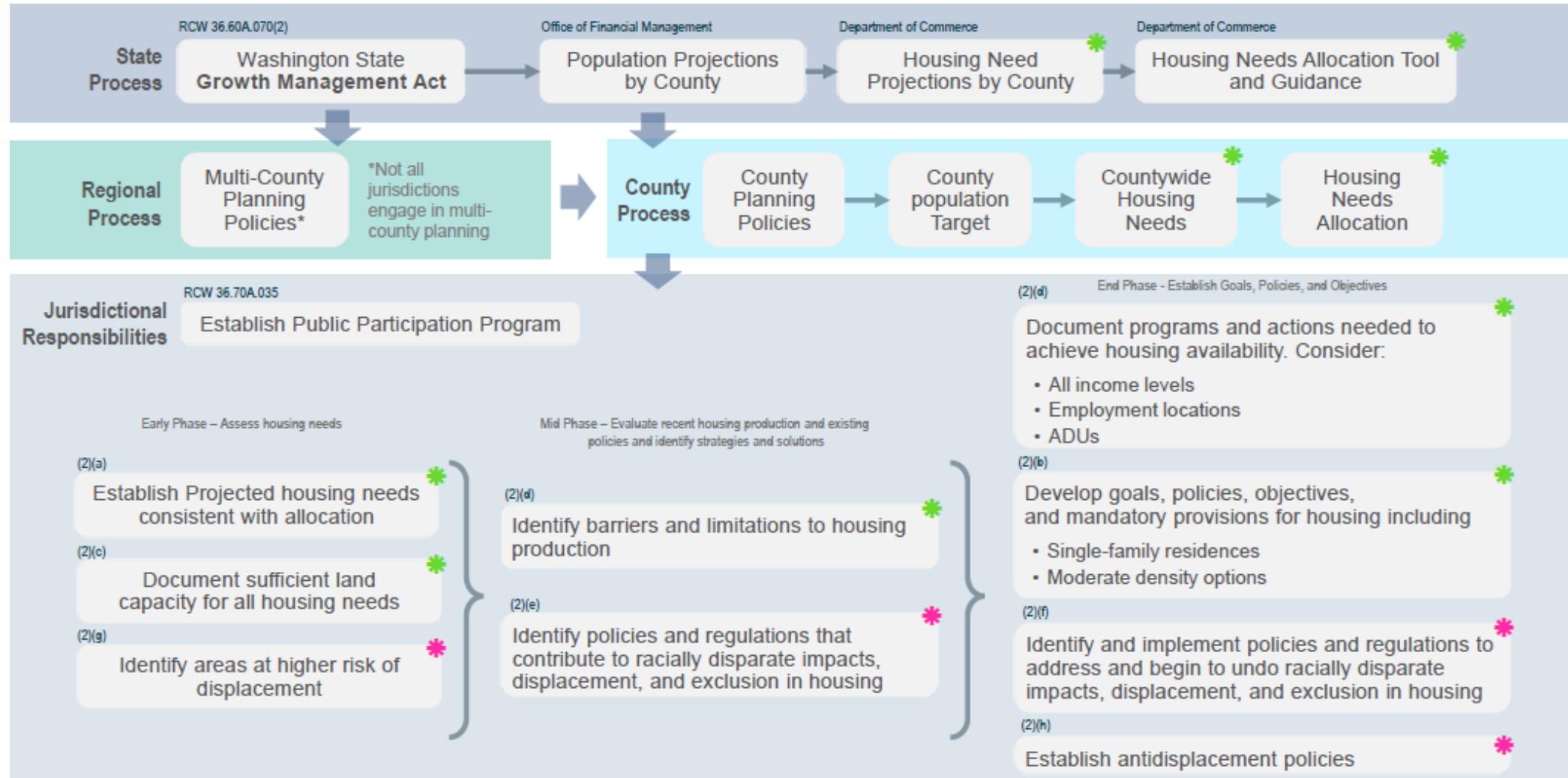


Growth Management Act – Housing Goal

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



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 of the population size thresholds requires cities to allow middle housing in at least one form.


Which cities are required to allow middle housing? Any population size threshold that includes a city currently subject to a growth management plan is subject to the requirements of the bill.

When does a local government have to implement the bill? RCW 36.70A.130. Cities that have the bill included in their comprehensive plan must implement the bill within 12 months after the effective date of the bill.


¹ E2SHB 1110, Section 3(1)
² Estimate: <https://ofm.wa.gov>
³ If your city is listed or not listed in the table, it is subject to the requirements of the bill.

E2SHB 1110 MIDDLE
V3.1





We strengthen communities




Establishing Housing Targets for your Community

County-level considerations for housing planning

LOCAL GOVERNMENT DIVISION
GROWTH MANAGEMENT SERVICES

V3.4



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 cycle.

City _____

Staff contact, phone + email _____



We strengthen communities



Guidance to address racially disparate impacts

Updating your housing element to address new requirements

LOCAL GOVERNMENT DIVISION
GROWTH MANAGEMENT SERVICES

V3.2

Periodic update resources including checklists, guidebooks, and templates will be available prior to their 2026-2027 updates. A

Please refer to the following Commerce housing [elements](#) and [Planning for Housing](#). Cities required to complete their update in 2024 now have until 2025 to complete their updates in 2025-2027 are still required to meet the new criteria which will be required to submit an update plan.

Participation in planning efforts with local and regional governments is encouraged. Cities are encouraged to begin providing separated organic materials collected and delivered to composting and other facilities. Cities are encouraged to consider modifying urban growth areas.

Phase I – Community Engagement

Summer 2023 – Fall 2023

- Community Outreach – Initial Actions
- Gap Analysis – To be completed September 2023
- Data Collection – To be completed Spring 2024
- Format of the Updated Plan – To be 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 Work Sessions

1. Housing Element

- Planning Commission – 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 work session
 - General Government Committee – September 13, 2023

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

- October 11, 2023 – Briefing on 2025 Development Code Update
- October 24, 2023 – City Council Work Session on Comprehensive Plan Update

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:

Brad Medrud, AICP
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

Pete Kmet, Mayor
Neil McClanahan, Mayor Pro Tem
Nicole Hill
Tom Oliva
Joan Cathey
Eileen Swarthout
Ed Hildreth
Debbie Sullivan

TUMWATER PLANNING COMMISSION

Deborah Reynolds, Chair
Nancy Stevenson, Vice Chair
Terry Kirkpatrick
Dennis Morr Jr.
Leatta Dahlhoff
Jessica Hausman
Joel Hansen
Michael Althauser

TUMWATER CITY STAFF

John Doan, AICP, City Administrator
Michael Matlock, AICP, Community Development Director
Brad Medrud, AICP, Planning Manager
David Ginther, Senior Planner
Megan Lande, Planning Intern

**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*

**HOUSING ELEMENT
TABLE OF CONTENTS**

TABLE OF CONTENTS

1.	INTRODUCTION	1
1.1	Introduction	1
1.2	Growth Management Act Goals Compliance	2
1.3	County-Wide Planning Policy Compliance.....	3
1.4	Sustainable Thurston Goals	5
1.4.1	Priority Goals.....	5
1.4.2	Community Goals	5
1.4.3	Housing Goals.....	5
1.5	Affordable Housing Definition.....	6
1.6	Ongoing Review Program	7
1.7	Amendments.....	7
2.	EXISTING HOUSING DISTRIBUTION	8
2.1	Introduction	8
2.2	Housing Pattern	8
2.3	Housing Trends and Projections.....	8
3.	EXISTING HOUSING INVESTMENT PROFILE	11
3.1	Introduction	11
3.2	Federal and State Housing Financing Programs	11
3.3	Local Financing	12
3.4	Conclusion	13
4.	AFFORDABLE HOUSING NEEDS.....	14
4.1	Introduction	14
4.2	Emergency Shelters and Transitional Housing.....	14
4.3	Private Subsidized Housing.....	18
4.4	Publicly Subsidized Housing	18
4.5	Low and Moderate Income Definitions	19
4.6	Housing Needs Gaps and Coordination Points.....	20
4.7	Homelessness	20
4.8	Conclusion	21
5.	HOUSING GOALS, POLICIES, AND ACTIONS.....	23
5.1	Housing Goals, Policies, and Actions	23

HOUSING ELEMENT

TABLE OF CONTENTS

6.	REGULATORY BARRIER ASSESSMENT	32
6.1	Introduction	32
6.2	Community Perceptions	32
6.3.	Growth Management	33
6.4	Permitting.....	33
6.5	Infrastructure	33
6.6	Zoning Code	33
6.7	Building Code	34
6.8	Conclusion	35
7.	CITYWIDE HOUSING NEEDS	36
7.1	Introduction	36
7.2	Housing Needs.....	36
7.3	Conclusion	37
8.	SUFFICIENT LAND FOR HOUSING.....	38
8.1	Introduction	38
8.2	Identification of Expected Population	38
8.3	Identification of Sufficient Land for Housing	38
8.4	Sufficient Land for Specific Housing Needs.....	41
8.4.1	Government Assisted Housing.....	41
8.4.2.	Housing for Low Income People.....	41
8.4.3.	Manufactured Housing.....	41
8.4.4.	Multi-Family Housing	42
8.4.5.	Group and Foster Care Homes	42
8.5	Vacancy Rates	42
8.6	Conclusion	42
9.	EXISTING AND FUTURE HOUSING PROVISIONS.....	43
9.1	Introduction	43
9.2	Protection of Existing Housing Stock.....	43
9.3	Low and Moderate Income Provisions.....	43
9.4	Regulatory Barriers to Affordable Housing	43
9.5	Sufficient Land for 20 Years of Housing	44
9.6	Employment	44
9.6.1	Thurston County Employment Base	44
9.7	Unemployment	46
9.8	Conclusion	46

HOUSING ELEMENT
TABLE OF CONTENTS

LIST OF TABLES

Table 1. Foundational Plans and Data 1

Table 2. Existing Housing Stock in in the City of Tumwater 9

Table 3. Shelter Capacity in Tumwater Area 15

Table 4. Transitional and Low Income Housing Units in the City of Tumwater 16

Table 5. 2019 Tumwater School District - Poverty and Homelessness 21

Table 6. Housing Units Needed for 20-Year Planning Period 40

TABLE OF FIGURES

Figure 1. Existing Housing Stock in Tumwater 10

Figure 2. Tumwater 2015 Employment Base 45

**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

**HOUSING ELEMENT
CHAPTER 2**

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.

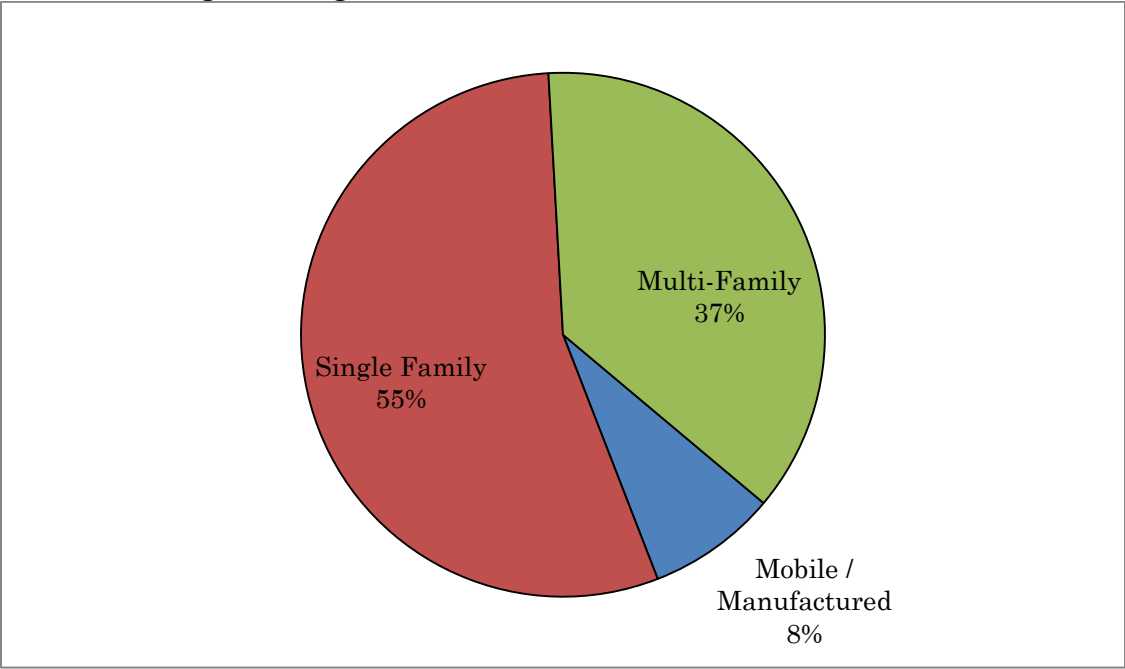
The ratio of owner-occupied and non-owner occupied housing is another aspect of housing that gives some insight into the community's makeup. In 1990, 53% of the housing units in Tumwater were owner occupied. In 2000, that number dropped to 48% and increased again to 54% in 2015. Just under half of all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

**HOUSING ELEMENT
CHAPTER 4**
AFFORDABLE HOUSING NEEDS

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

**HOUSING ELEMENT
CHAPTER 4**
AFFORDABLE HOUSING NEEDS

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

**HOUSING ELEMENT
CHAPTER 4**
AFFORDABLE HOUSING NEEDS

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

**HOUSING ELEMENT
CHAPTER 4**
AFFORDABLE HOUSING NEEDS

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.

**HOUSING ELEMENT
CHAPTER 4**

AFFORDABLE HOUSING NEEDS

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

and transitional housing.

HOUSING ELEMENT
CHAPTER 5

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

**HOUSING ELEMENT
CHAPTER 5**

HOUSING GOALS, POLICIES, AND ACTIONS

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

**HOUSING ELEMENT
CHAPTER 5**

HOUSING GOALS, POLICIES, AND ACTIONS

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.

**HOUSING ELEMENT
CHAPTER 5**

HOUSING GOALS, POLICIES, AND ACTIONS

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

**HOUSING ELEMENT
CHAPTER 5**
HOUSING GOALS, POLICIES, AND ACTIONS

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.
-------	--

**HOUSING ELEMENT
CHAPTER 5**

HOUSING GOALS, POLICIES, AND ACTIONS

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

**HOUSING ELEMENT
CHAPTER 5**
HOUSING GOALS, POLICIES, AND ACTIONS

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.

<u>Policy</u>	<u>Action</u>
----------------------	----------------------

- | | |
|--------|---|
| 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.

<u>Policy</u>	<u>Action</u>
----------------------	----------------------

- | | |
|--------|--|
| 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
CHAPTER 8**
SUFFICIENT LAND FOR HOUSING
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

HOUSING ELEMENT CHAPTER 8

SUFFICIENT LAND FOR HOUSING

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

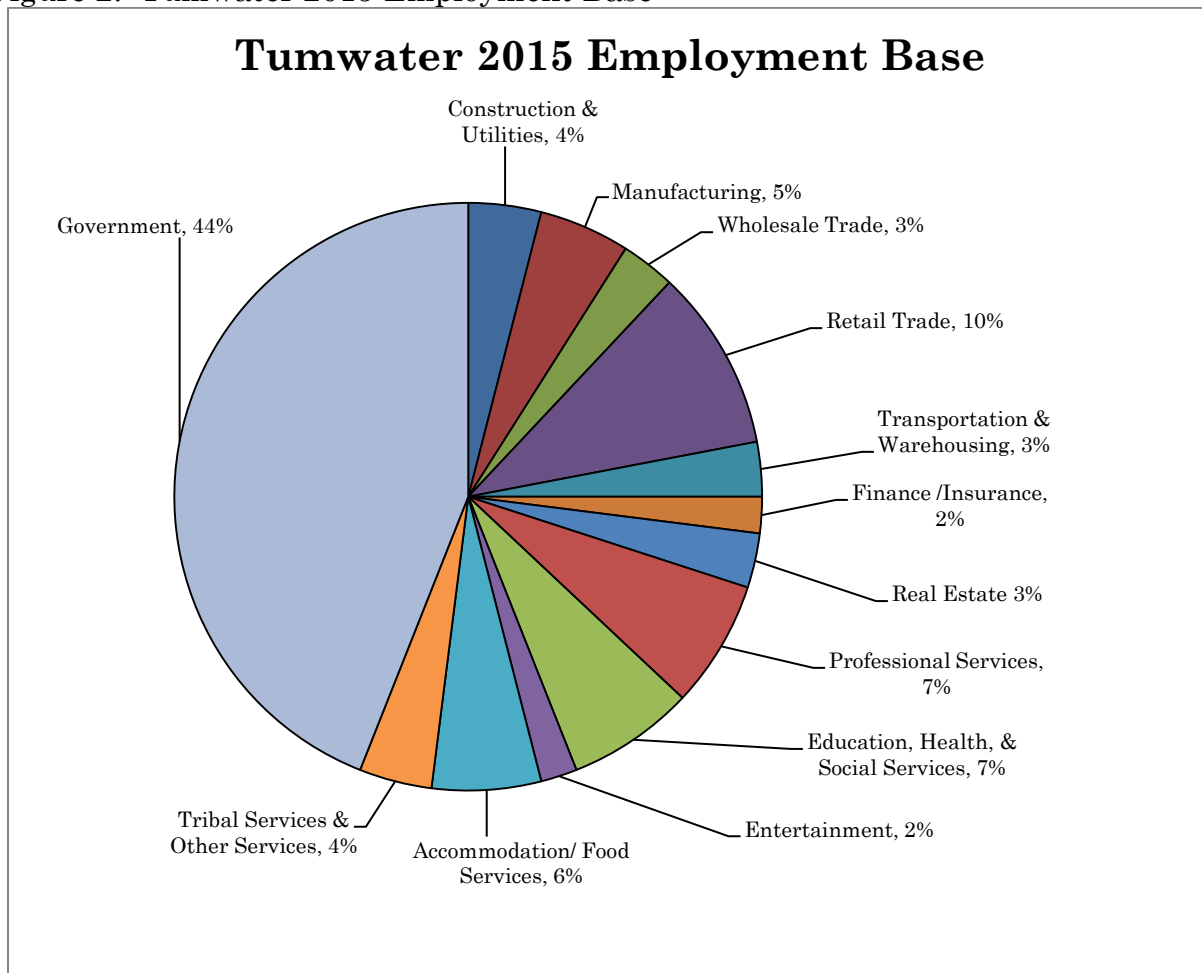
Employment quantity and quality is an important consideration when considering housing affordability. The availability of jobs that pay a wage adequate to enable people to afford housing is of paramount importance. Much of the information included in this section is compiled from The Profile, assembled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

Suzanne Austin, AICP

Senior Planner

Growth Management Services

WA Department of Commerce

509.407.7955

suzanne.austin@commerce.wa.gov

Checklist Navigation

(Ctrl + Click each element)

Section I: Comprehensive Plan

LAND USE

HOUSING

CAPITAL FACILITIES

UTILITIES

TRANSPORTATION

SHORELINE

ESSENTIAL PUBLIC FACILITIES

TRIBAL PLANNING

ECONOMIC DEVELOPMENT

PARKS & RECREATION

OPTIONAL ELEMENTS

CONSISTENCY

PUBLIC PARTICIPATION

Section II: Development Regulations

CRITICAL AREAS

ZONING CODE

SHORELINE MASTER PROGRAM

RESOURCE LANDS

ESSENTIAL PUBLIC FACILITIES

SUBDIVISION CODE

STORMWATER

ORGANIC MATERIALS MANAGEMENT

IMPACT FEES

CONCURRENCY & TDM

TRIBAL PARTICIPATION

OPTIONAL REGULATIONS

PROJECT REVIEW PROCEDURES

PLAN & REGULATION AMENDMENTS

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)			
--	--	--	--

	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			
--	--	--	--

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
<p>Economic Development</p> <p>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</p>		
<p>Parks and Recreation</p> <p>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)</p>		

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>			
--	--	--	--

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 			
---	--	--	--

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

Acknowledgements

Washington State Department of Commerce

Director: Lisa Brown

Local Government Division: Mark Barkley, Assistant Director

Growth Management Services: Dave Andersen, AICP, Managing Director

Editors:

Anne Fritzel, AICP, Senior Planner and Laura Hodgson, Associate Planner

Content Development: BERK

Lisa Grueter, AICP

Kevin Ramsey, PhD

Content Development: MAKERS Architecture and Urban Design

Bob Bengford, AICP

Rachel Miller

Ian Crozier, AICP

Cover Image:

Adobe Stock Image

Advisory Committee

Steve Butler, FAICP; Laura Crandall, MPA - Municipal Research and Services Center

Paul Inghram, FAICP; Laura Benjamin; Charles Patton - Puget Sound Regional Council

Emily Grossman - Commerce

This draft document was produced for Washington state communities planning under the Growth Management Act. Commerce is accepting comments on this document until June 30, 2021. Please provide comments by email to

Anne.Fritzel@commerce.wa.gov.

Final draft published March 2021 at:

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

Washington State Department of Commerce, P.O. Box 42525,
Olympia, WA 98504-2525 www.commerce.wa.gov

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).

Contents

Acknowledgements	2
Chapter 1. Introduction	5
Purpose of a Housing Element.....	5
Requirements for a Housing Element under GMA	6
Relationship between Housing Element and Housing Action Plan	8
Chapter 2. Housing Needs Assessment.....	9
Requirements for an HNA	9
Housing Targets	10
Land Capacity Analysis	17
Next Steps: How the HNA fits into your Comprehensive Plan	22
Chapter 3. Countywide Planning Policies	23
Coordinated Housing Planning Under the GMA	23
Updating Countywide Planning Policies	27
Example Countywide Planning Policies for Housing	30
Regional Housing Studies and Strategies	37
Chapter 4. Housing Element Review	38
Purpose of a Housing Element Review	38
Review of Housing Element Goals and Policies.....	38
Consider Opportunities and Trends Not Foreseen by the Comprehensive Plan	43
Evaluating Progress towards Growth Targets	43
Review the Future Land Use Map and Designations	47
Identify Related Infrastructure or Service Needs	52
Consider Reasonable Measures Identified in Buildable Lands Reports.....	53
Next Steps.....	53
Chapter 5. Updating Goals and Policies	54
What are Goals and Policies?	54
Requirements and Guidelines for Housing Goals	55
Recent Updates to Housing Laws	56
Updating Existing Housing Goals and Policies	56
What Related Policy Changes May Be Needed in Other Comprehensive Plan Elements?	58
Additional Housing Policy Issues.....	59
Evaluating your Goals and Policies	65
Final Check on Policies	65

Chapter 6. Identifying Strategies to Implement Your Policies.....	66
Strategies Should Work Together	66
Chapter 7. Adopting Your Housing Element	71
Public Engagement	71
Adoption Process	76
Final Steps.....	78
Chapter 8. Implementing and Monitoring Your Housing Element.....	79
Develop an Implementation Plan	79
Develop a Monitoring Program.....	82
Appendix A: Acronyms.....	88
Appendix B: Housing Strategies	89
Appendix C: Housing Law and Case Law	90
Washington State Housing Requirements.....	90
Legal Cases to Consider	92
Appendix D: Housing Element Policy Examples	95
Appendix E: Federal and State Housing Policy History	116
Federal Housing Policy Timeline.....	116
Housing Policy in Washington State	121

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

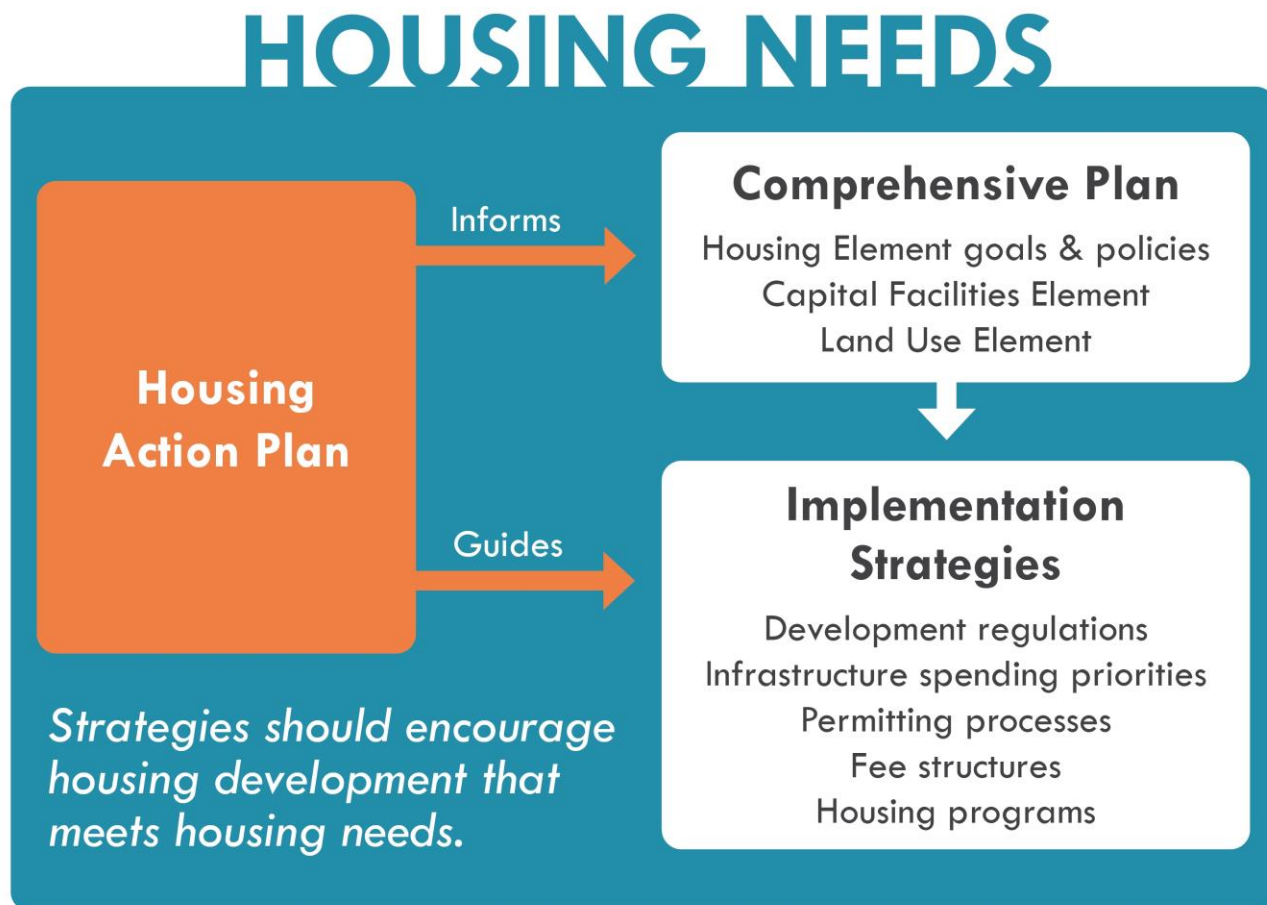
Topic	Guidance	Notes
Housing needs assessment		See Chapter 2. Housing Needs Assessment
<ul style="list-style-type: none"> Community profile (population and household characteristics) 	<ul style="list-style-type: none"> Required 	For details on required and recommended contents for a housing needs assessment, 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

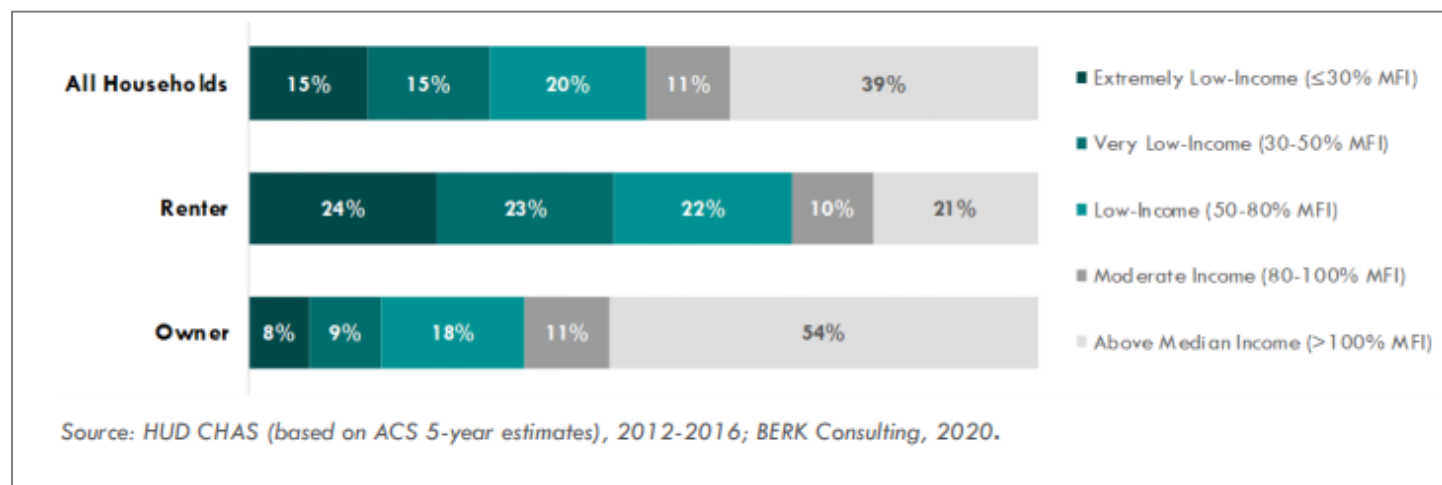
Unless there are specific countywide planning policies allocating how affordable housing is to be planned for or unique circumstances within the county, jurisdictions should assume that they should plan for housing to meet the needs of the various economic segments within the county. This is important 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.

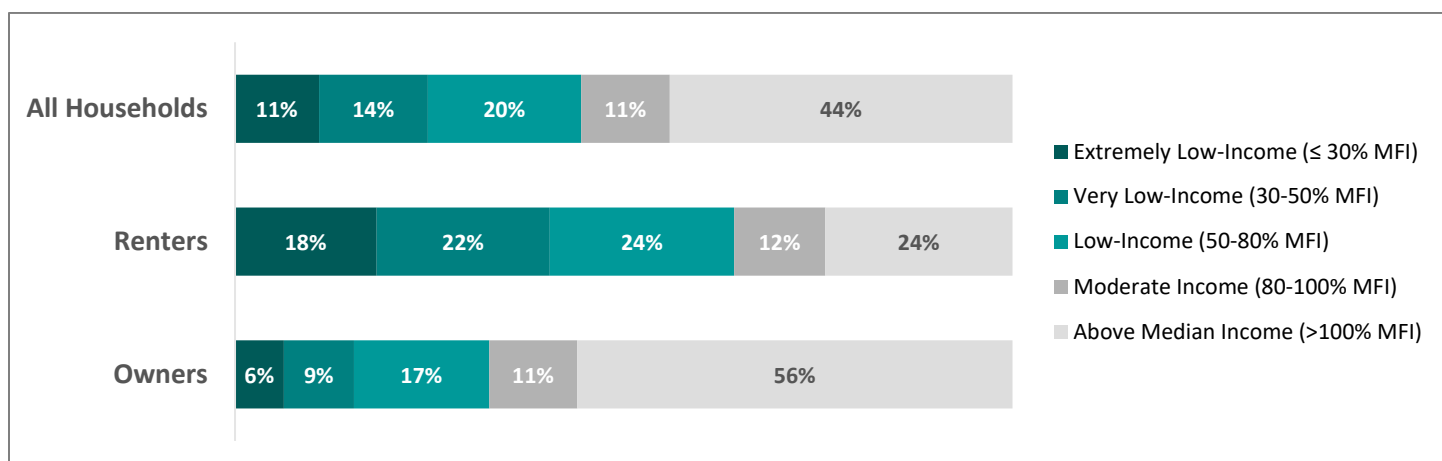
¹¹ For example, if you're calculating housing targets for Federal Way, using King County's income breakdown for future growth may not be appropriate, given that the county's incomes are so much higher than local incomes, and will continue to be so in the future.

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

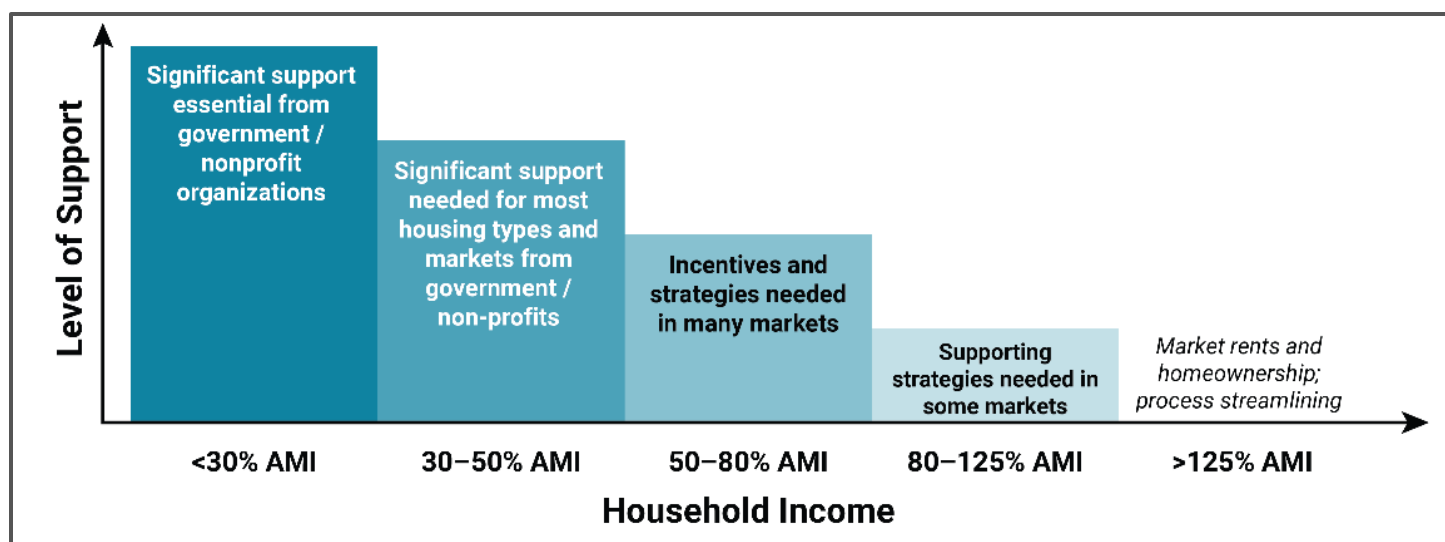
Household Income Distribution (MFI = median family income)	County Percentage	Total Future Units Needed
Extremely Low-Income (\leq 30% MFI)	10.8%	625
Very Low-Income (30-50% MFI)	14.0%	811
Low-Income (50-80% MFI)	19.7%	1,147
Moderate Income (80-100% MFI)	11.4%	664
Above Median Income ($>$ 100% MFI)	44.1%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

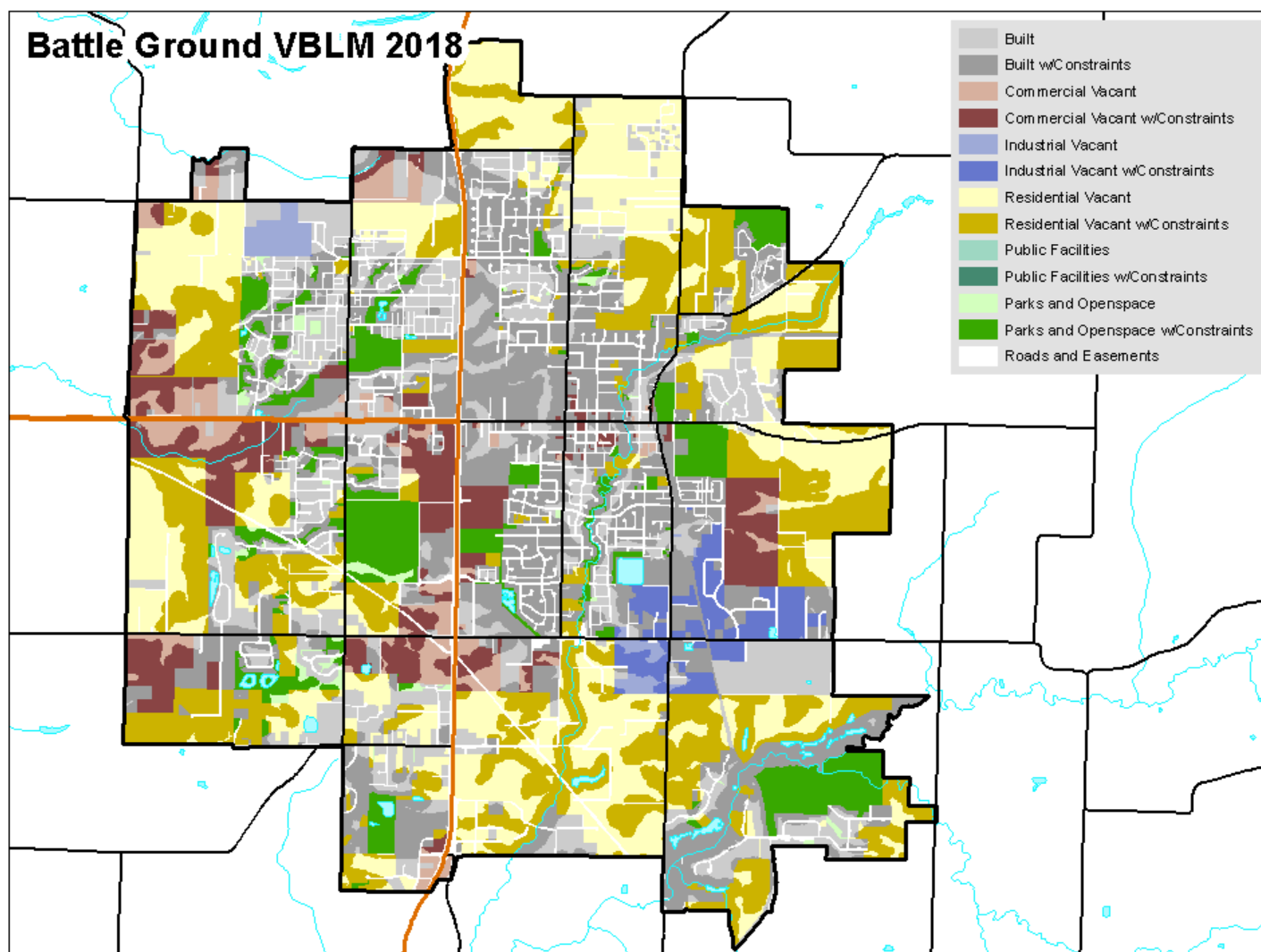
County-level buildable lands reporting should offer detailed methodology notes for reference by included communities.

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

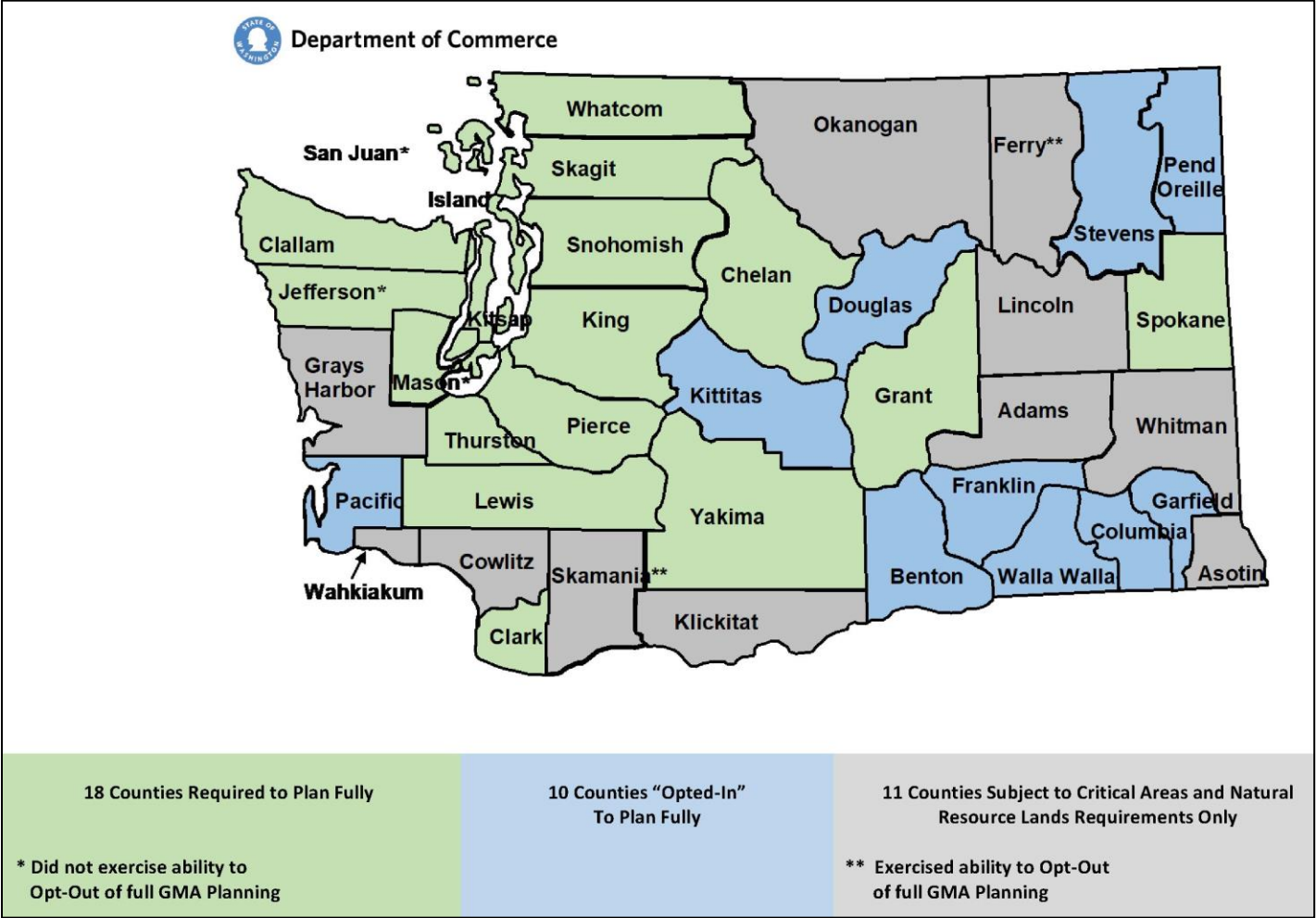
The policies of city and county comprehensive plans in Kitsap, King, Pierce and Snohomish counties must also be consistent with the multicounty planning policies (MPPs) in [Vision 2050](#) approved by the General Assembly of the Puget Sound Regional Council (PSRC) in October 2020. VISION 2050 includes 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](#), 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

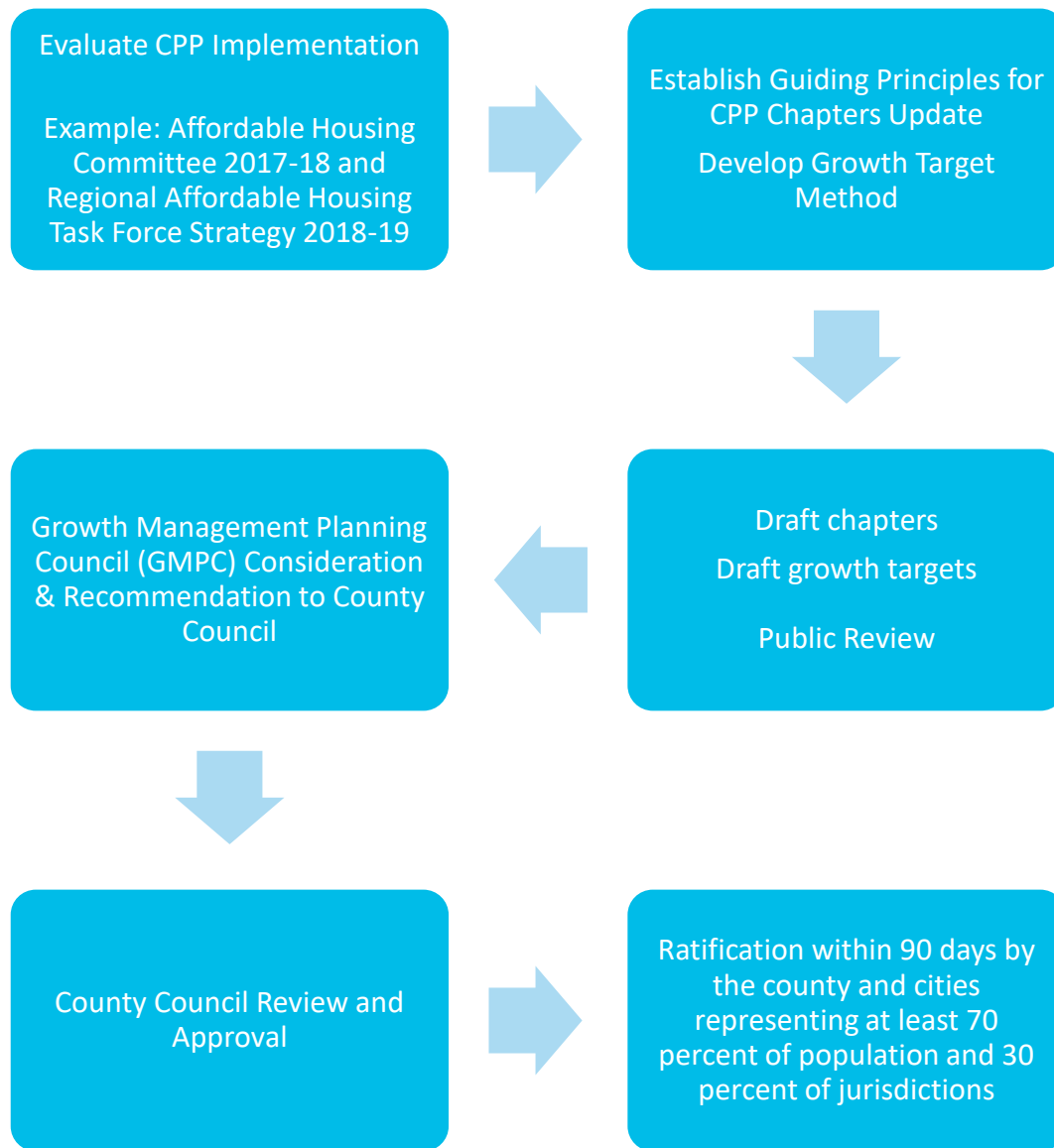
For example, King County is planning to prepare updates to CPPs to respond to OFM population allocations and prepare for a periodic review due by 2024. As part of the process, King County and its cities anticipate addressing the work of a 2017-2018 Affordable Housing Committee and to consider more local 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

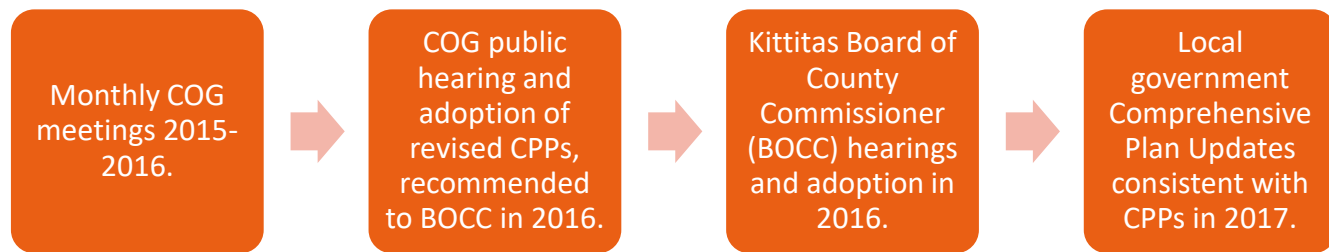


Source: <https://www.kingcounty.gov/depts/executive/performance-strategy-budget/regional-planning/Growth-Management/GMPC.aspx>

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>

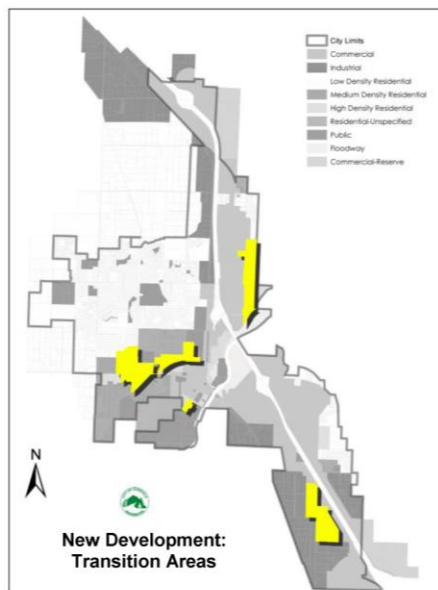
Source: BERK review of CPPs in Washington State, October 2020.

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.

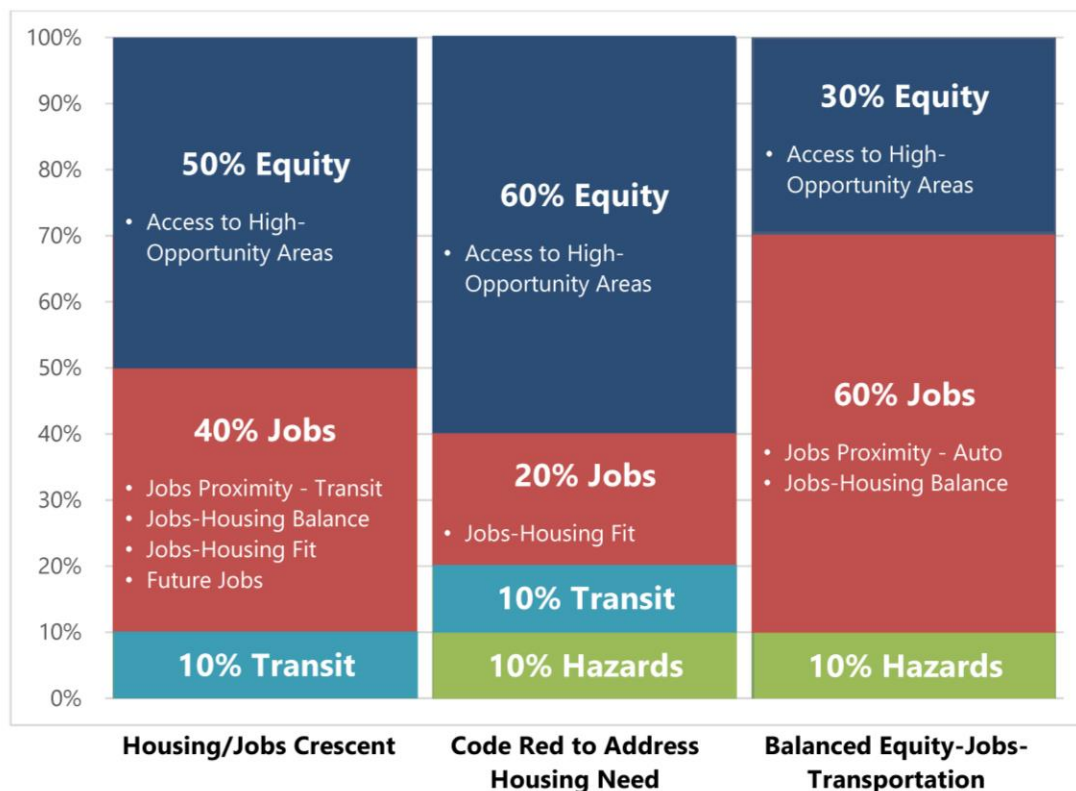
For example, the Association of Bay Area Governments (ABAG), a Metropolitan Planning Organization (MPO), is developing a methodology to allocate each jurisdiction's fair share of the regional allocation in a multi-county area of the San Francisco Bay Area (see [Exhibit 20](#)). In the spring of 2020, 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

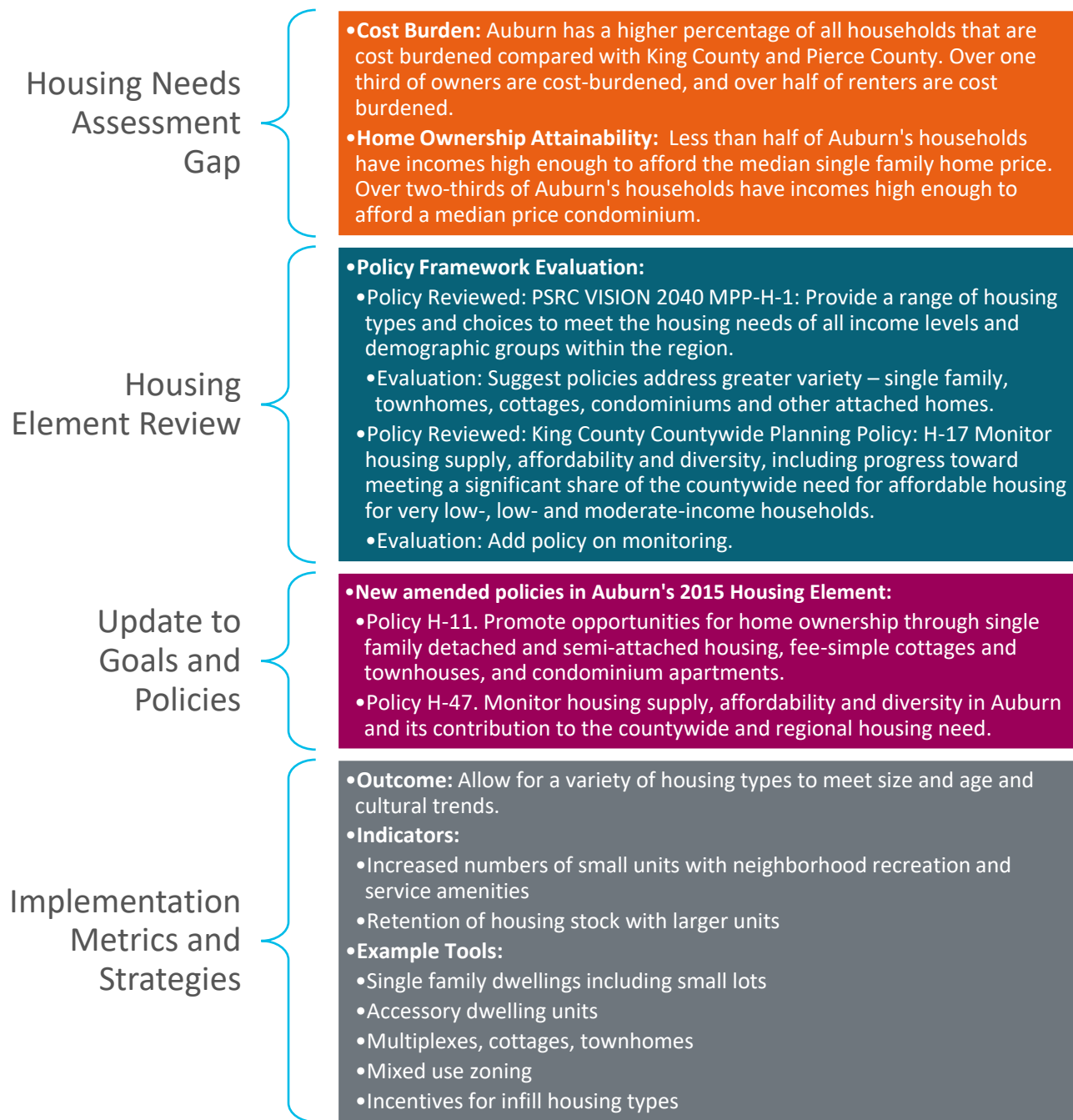
As discussed in Chapter 2, the housing element must be consistent with, and help to implement, countywide planning policies. Therefore, the housing element review should consider whether the goals and policies are, in fact, consistent with CPPs (and MPPs, where applicable). It should also consider whether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

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.

- 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.

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

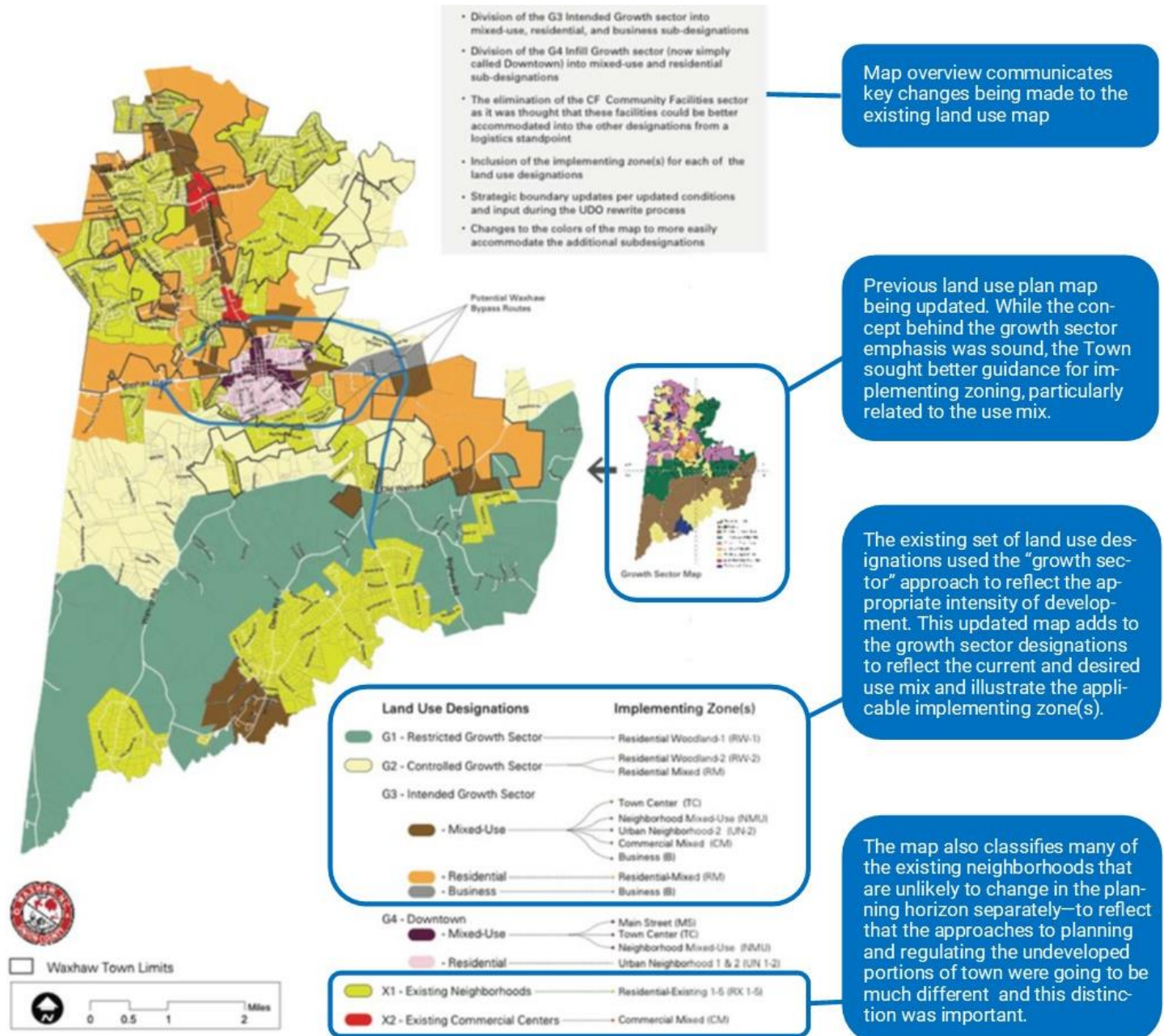
The blue shaded boxes denote the implementing zoning district for the applicable land use designation.

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.

[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

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

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

.....

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

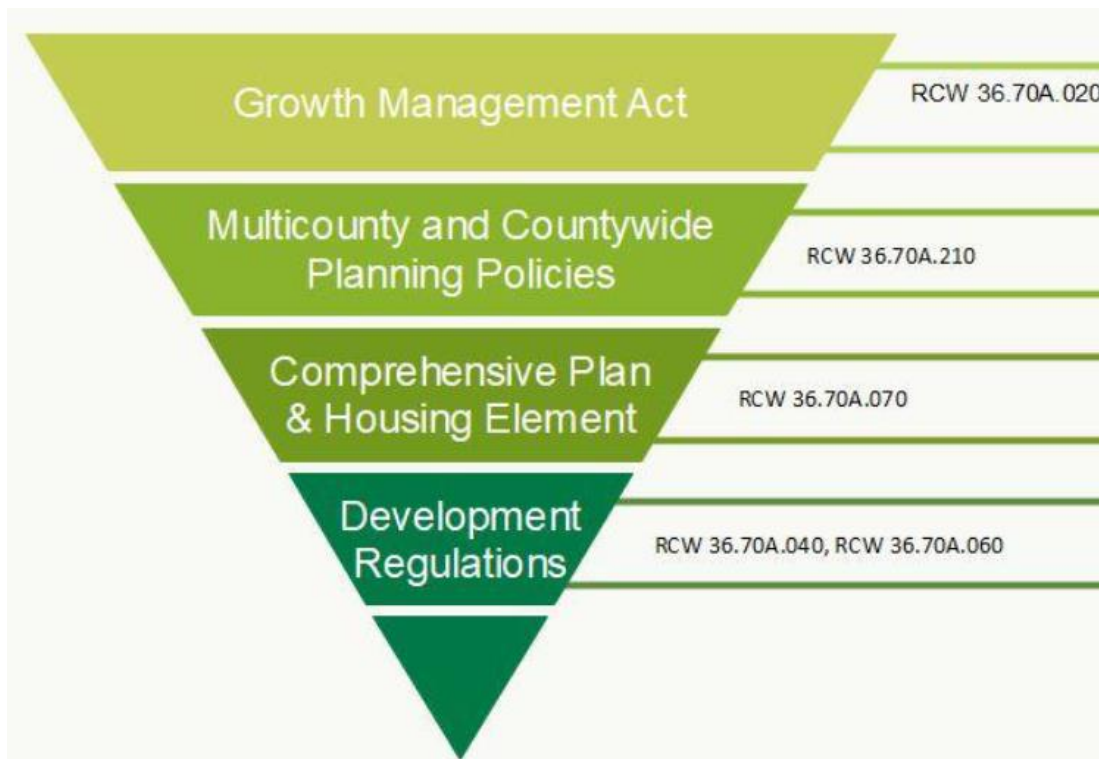
Evaluating your Goals and Policies

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.

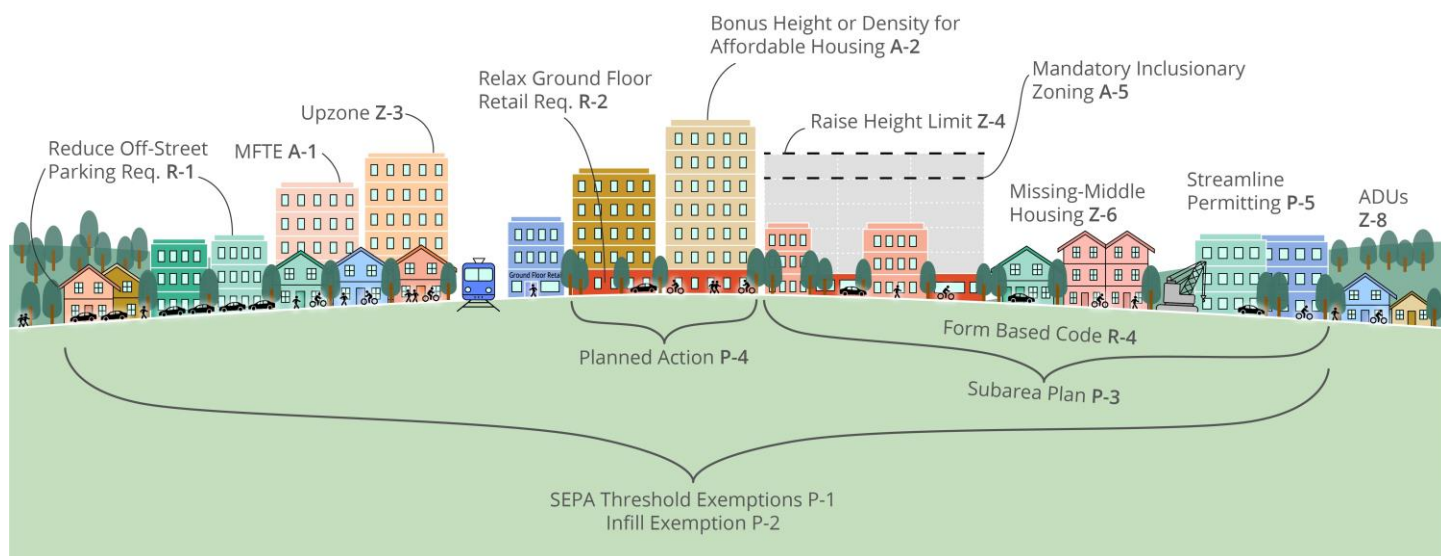
In 2019, funding was provided for cities to develop housing action plans as described in RCW 36.70A.600(2). Cities that received grant funding were required to identify strategies to encourage housing development that meets housing needs, as well as a plan for implementing those strategies. This chapter 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/pophc16jetgscstctmnbjomm0qa7tpu8.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.

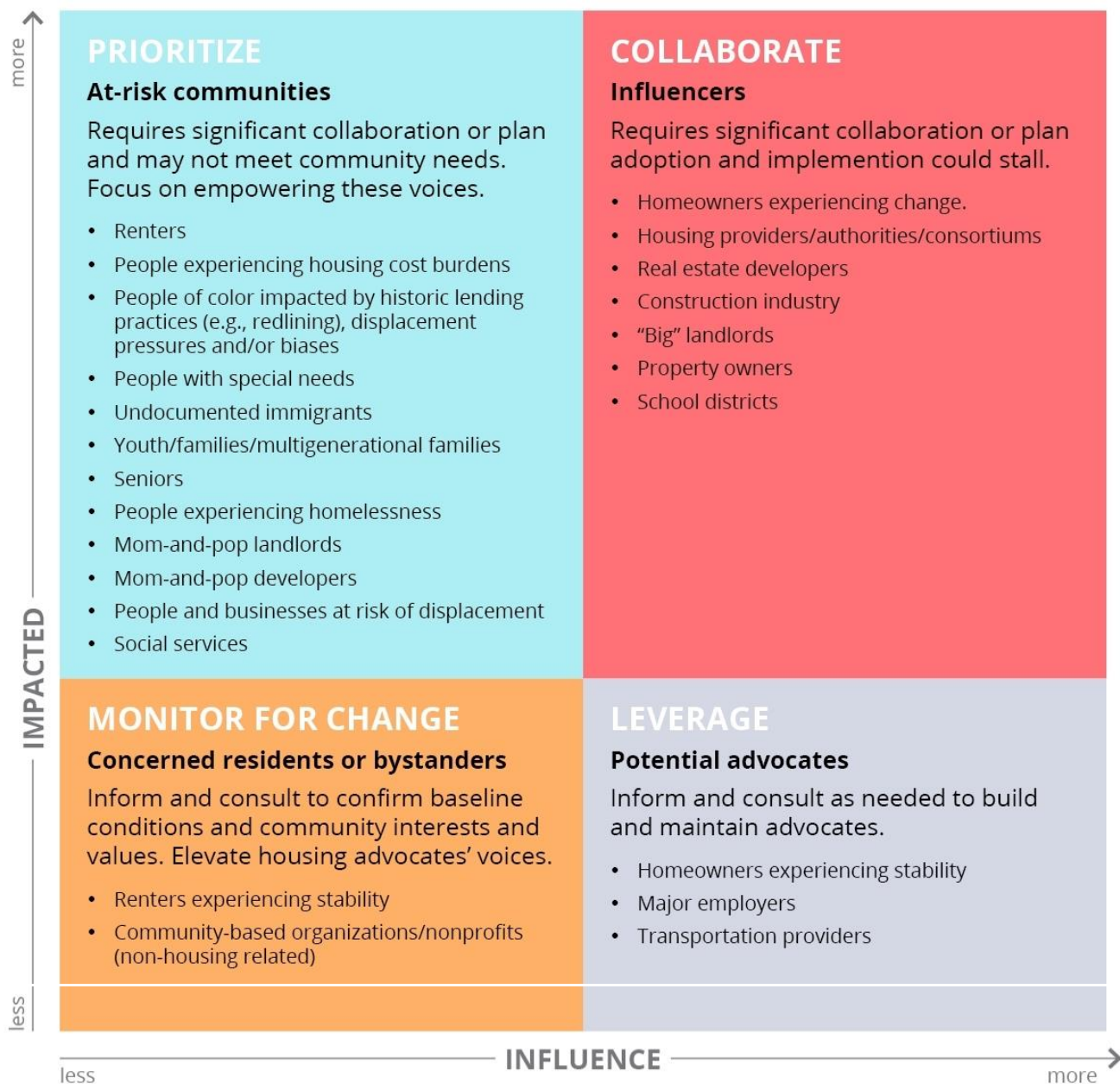
Collaboration with people who have historically been left out can lead to more creative and productive problem-solving. Good practices and goals include:

- 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:

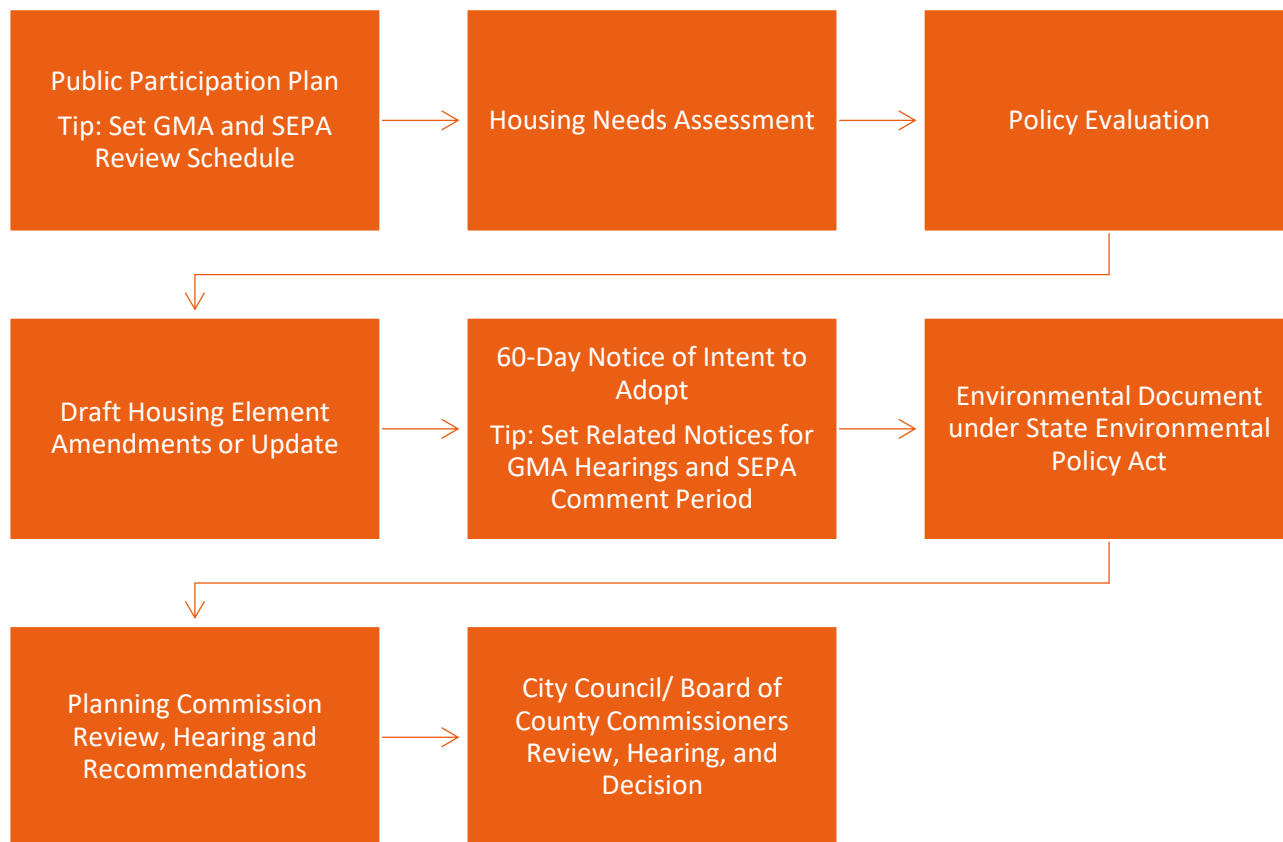
- Build in time to re-evaluate your engagement methods and fill in any information or advocacy gaps rising to the surface.
- Continue opportunistic piggybacking on pre-existing community meetings and popping up at events.
- Continue to provide information through websites.

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:

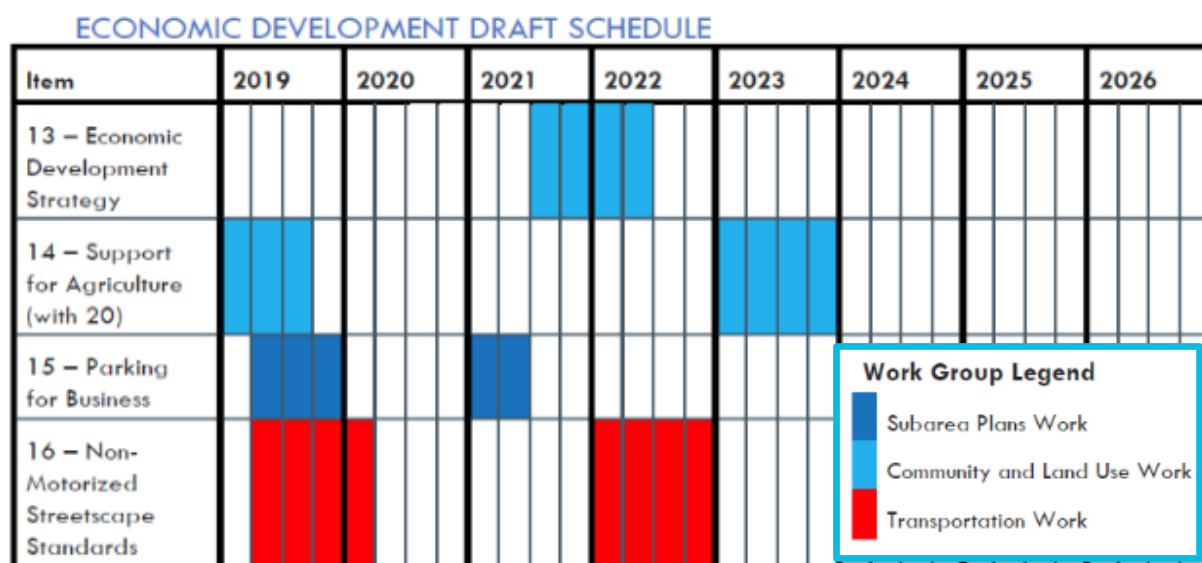
- Whether there are any windows of opportunity or time constraints that might motivate the scheduling of a high-priority action
- Steps, tasks and processes that will be required to implement the action
- Investment needed for each program or action (staff time, budget, etc.)
- Annual resources available (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.

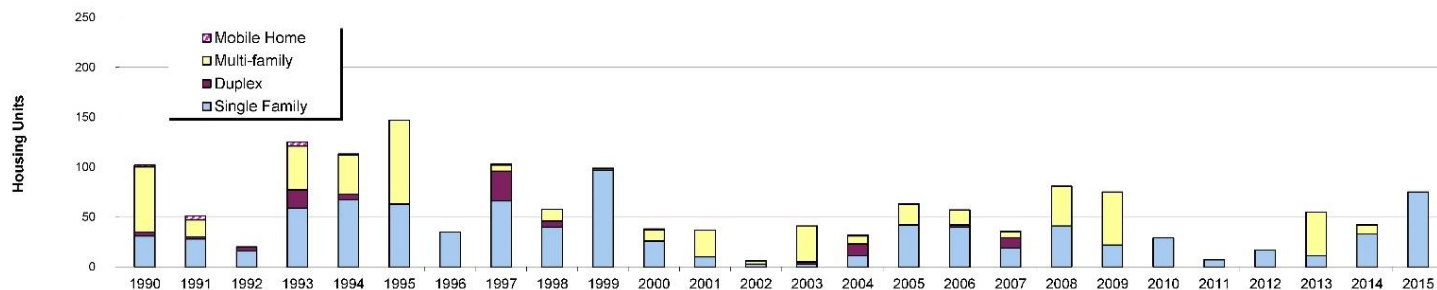
Example: Integrating performance measures into a growth monitoring report

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

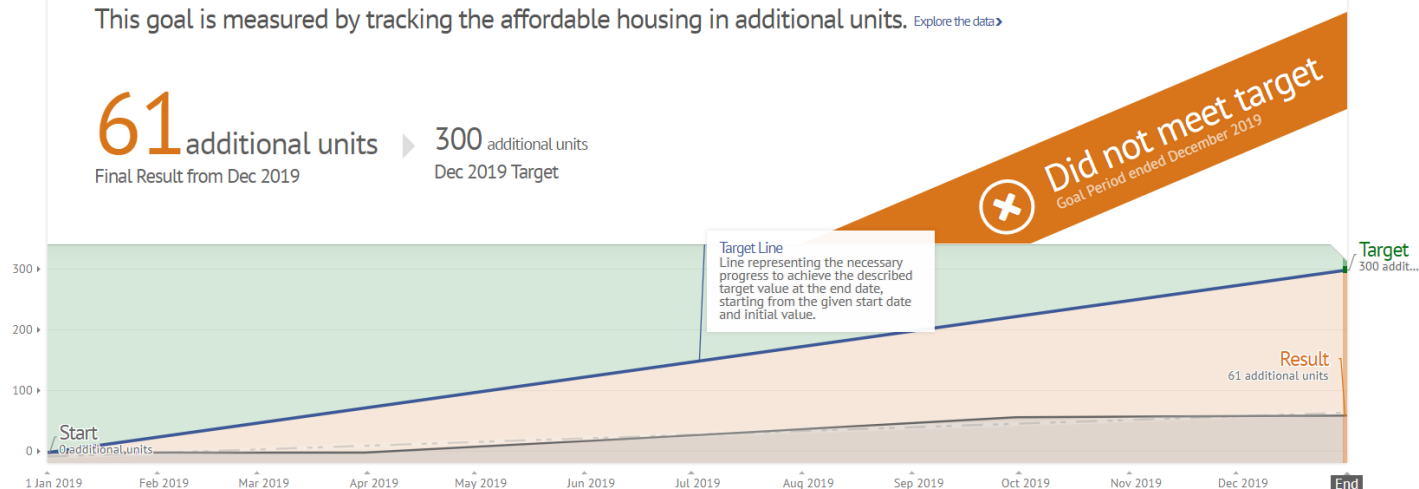
In addition to measuring progress from implementation toward a target goal, it can be helpful to track and visualize a performance metric over time, including before and after implementation of an action. This can be useful for understanding whether the actions taken had their intended effect or not. 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

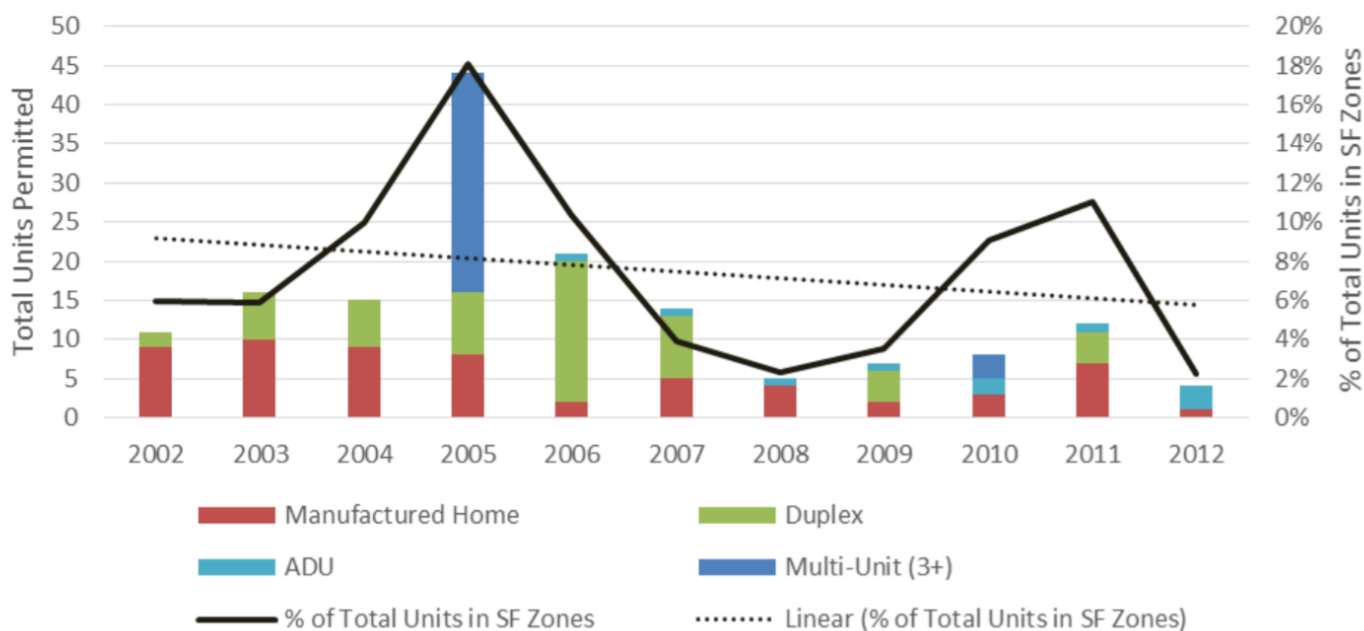
Increase the affordable housing units to 300 units by December 2019.

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/>

Acknowledgments

Washington State Department of Commerce

Current Acting Director: Kendrick Stewart

Local Government Division: Mark Barkley, Assistant Director

Growth Management Services: Dave Andersen, AICP, Managing Director

Editors

Anne Aurelia Fritzel, AICP, GMS Housing Programs Manager

David Osaki, Senior Planner

Jeremy Walker, Senior Project Manager

Laura Hodgson, Senior Planner

Content Development

BERK Consulting:

Dawn Couch

Michelle Ellsworth

Radhika Nair

Sabrina Santos

Advisory Committee

Hannah Bahnmitter, City of Renton

Elliott Barnett, City of Tacoma

Brent Butler, Jefferson County

Joseph Calhoun, City of Yakima

Elizabeth Chamberlain, City of Walla Walla

Michelle Cooke, Benton County

Rebecca Deming, City of North Bend

Maren Murphy, City of Spokane

Amber Piona, Snohomish County

Jessica Sanclemente-Gomez, City of Seattle

Ardele Steele, City of Zillah

Washington State Department of Commerce

PO Box 42525

Olympia, WA 98504-2525

www.commerce.wa.gov

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).

Table of contents

Introduction.....	10
New requirements for housing planning	10
About this guidance	11
Principal definitions.....	11
Guidance for small communities	15
Step 1 and throughout: Engage the community.....	15
Step 2: Gather and analyze data	19
Assessing racially disparate impacts	20
Assessing exclusion in housing	22
Assessing displacement.....	25
Identify areas at higher risk of displacement	27
Step 3: Evaluate policies	33
Step 4: Revise policies	36
Step 5: Review and update regulations	41
Definitions.....	49
References and resources	51
Appendix A. Zoning and Race.....	53
Zoning and race.....	53
Chronology of race in land use.....	54
Key terms	56
Appendix B. Data Sources	63
Federal resources.....	63
Washington resources	66
Regional, county and local resources	67
Commercial and other resources.....	68
Appendix C. Technical Guidance on Data Analysis.....	69
Introduction.....	69
Measures of racially disparate impacts.....	70
Measures of exclusion in housing	83
Measures of displacement	93
Examples of displacement risk analysis	100
Appendix D. Policy Options	107
Policy options by category.....	107

Increase affordable housing production..... 108

Preserve existing affordable housing 116

Protect existing communities..... 119

Ensure the benefits of investment and development are equitably distributed 123

Monitor for equitable outcomes..... 124

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.wa.gov/department-of-archaeology-and-preservation)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

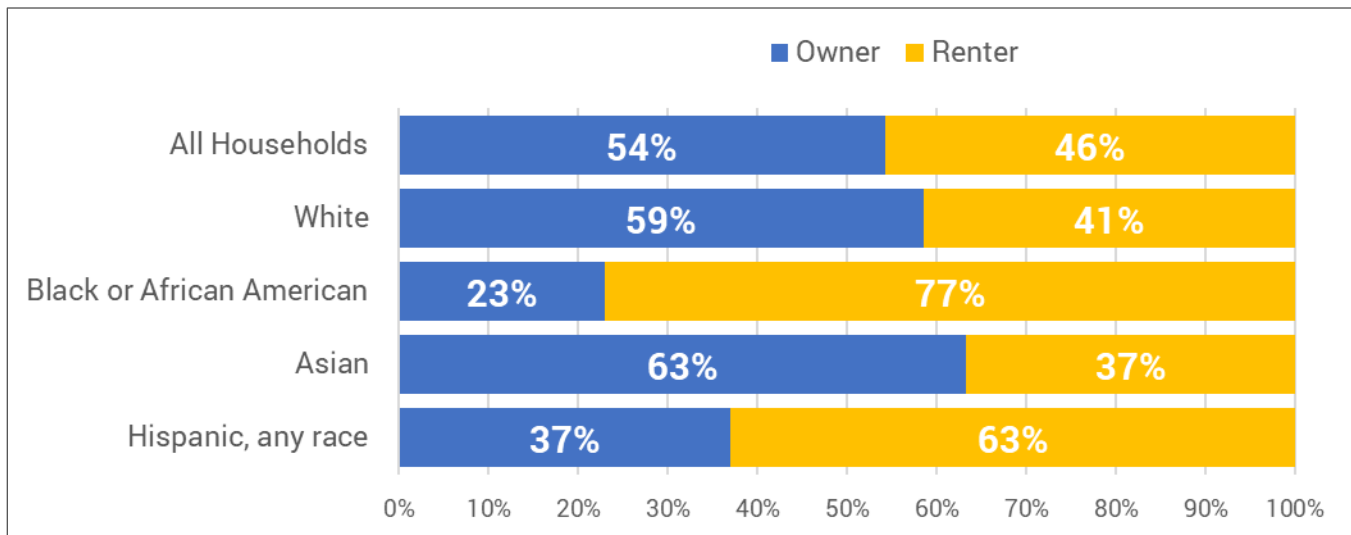
²⁶ <https://doh.wa.gov/data-and-statistical-reports/washington-tracking-network-wtn/washington-environmental-health-disparities-map>

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.

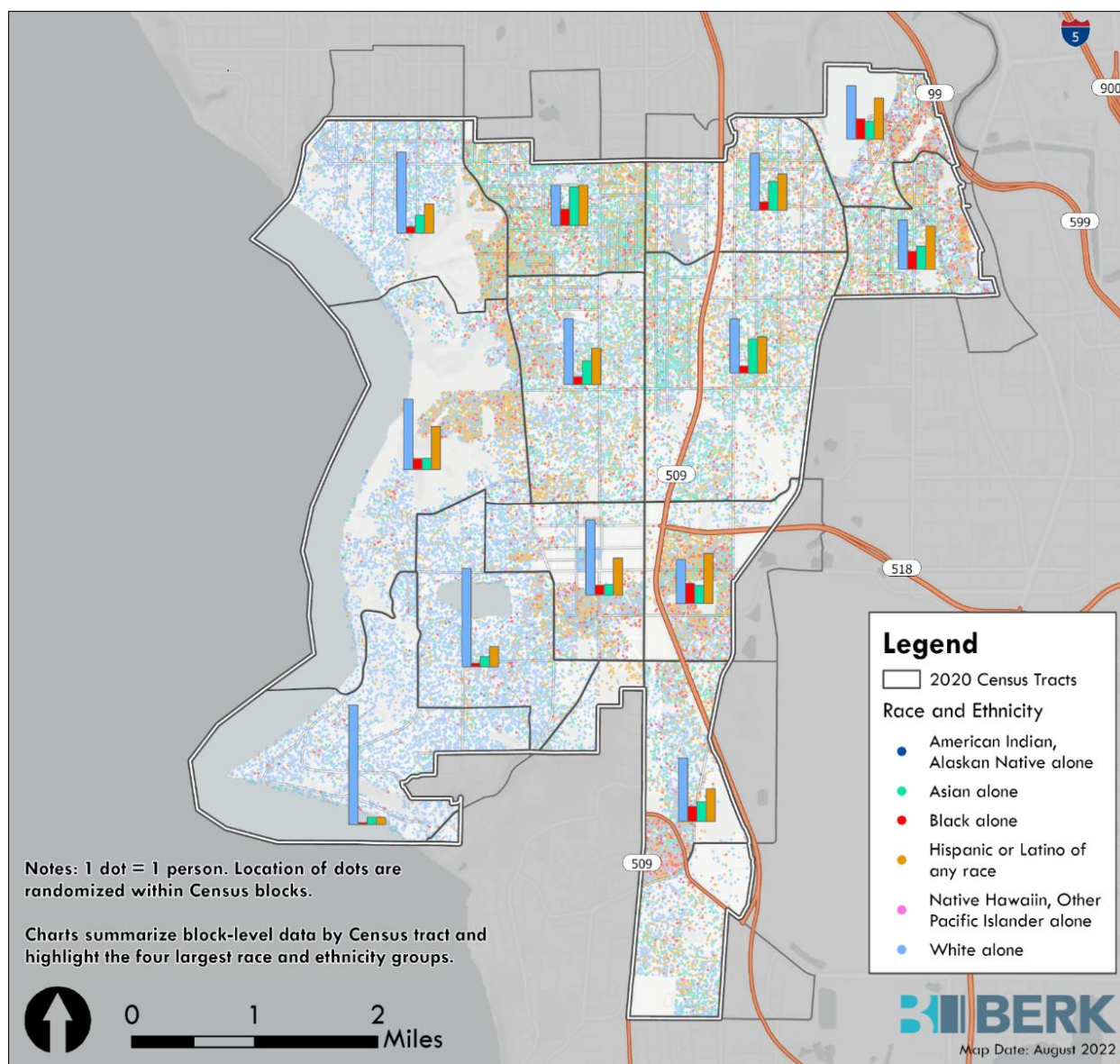
Exhibit 5 presents an example analysis of exclusion for the City of Burien based on 2020 U.S. Census data. The analysis uses a dot map³³ by census block group and summary histograms for census tracts. The analysis shows that people who identify as a race other than white are underrepresented in the southwest 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

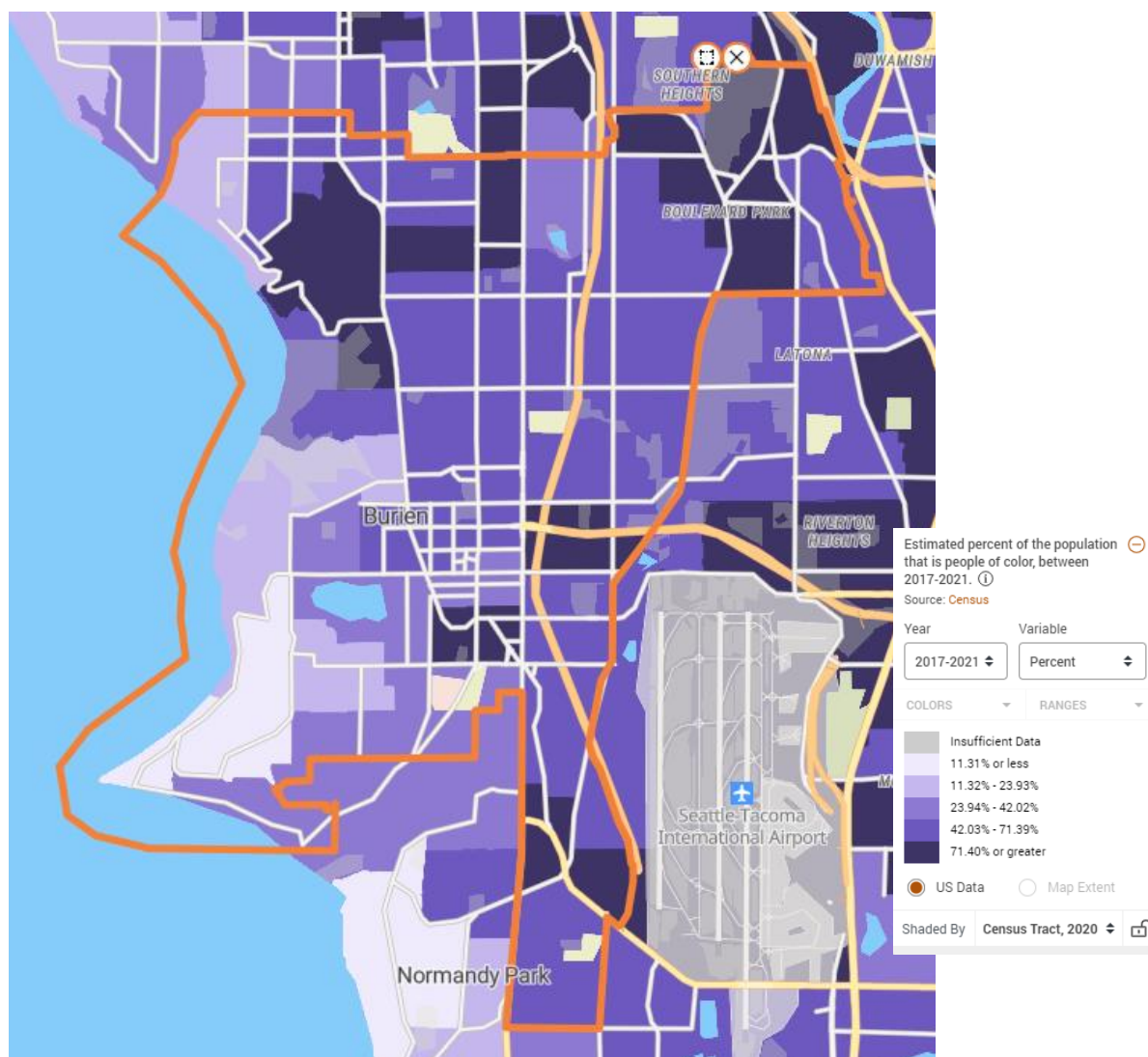


Sources: US Census, 2020; BERK, 2022

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.

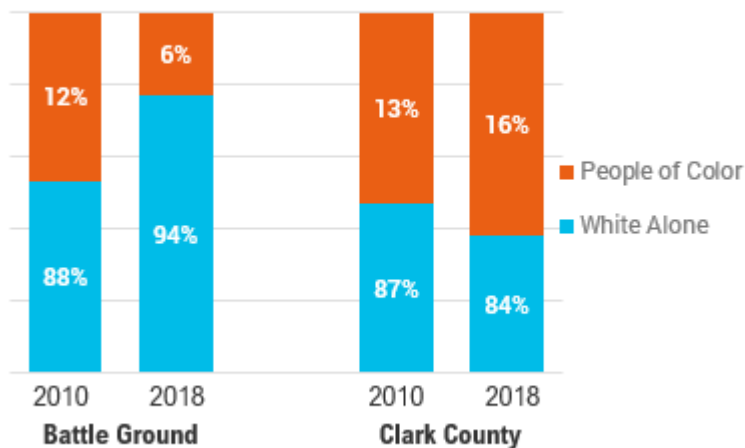
Exhibit 7 presents an example analysis of the racial composition of Battle Ground, Washington, including demographic change between 2010 and 2018 and comparing Battle Ground to Clark County. The analysis shows that white alone (not Hispanic) households comprised a greater share of the population in 2018 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

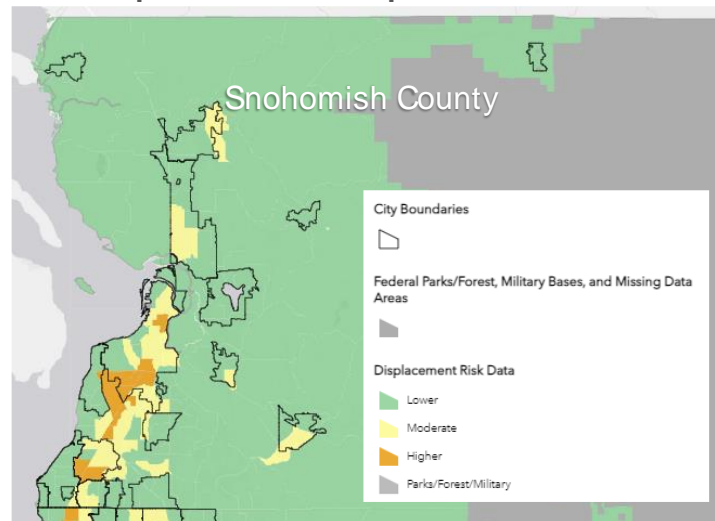
By considering who benefits and who is burdened by planning decisions and infrastructure investments, jurisdictions can adopt policies to prevent displacement, or at least reduce the hardships of displacement. For example, a new light rail transit station can lead to higher demand and rapid price increases, 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		Thresholds		State	
% People of Color		>28%		% People of Color		>31%	
% Without College Degree		>71%		% Without College Degree		>65%	
% Rentals		>35%		% Rentals		>37%	
Poverty Status: % Doing Ok		<66%		Poverty Status: % Doing Ok		<73%	
Median Home Value		<\$209,800		Median Home Value		<\$311,700	
Median Gross Rent		<\$893		Median Gross Rent		<\$1,194	

Vulnerability Levels		
High	>5 indicators	2
Moderate	3-4 indicators	3
Low	<3 indicators	4

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/>

References and resources

Achtenberg, E. (2002). *Stemming the Tide: A Handbook on Preserving Subsidized Multifamily Housing*. New York, NY: Local Initiatives Support Coalition.

American Planning Association (2019). *Planning for Equity Policy Guide*. Retrieved from https://planning-org-uploaded-media.s3.amazonaws.com/publication/download_pdf/Planning-for-Equity-Policy-Guide-rev.pdf.

Bates, L. K. (2013). *Gentrification and Displacement Study: Implementing an equitable inclusive development strategy in the context of gentrification*. Commissioned by the City of Portland, Bureau of Planning and Sustainability.

Bureau of Planning and Sustainability. (2021, April). *Anti-Displacement Action Plan*. Retrieved from https://www.portland.gov/sites/default/files/2021/final_foundationreport_main.pdf.

Chapple, K., and Loukaitou-Sideris, A. (2021). *White Paper on Anti-Displacement Strategy Effectiveness*. Retrieved from <https://www.urbandisplacement.org/wp-content/uploads/2021/08/19RD018-Anti-Displacement-Strategy-Effectiveness.pdf>.

King County. (2021, September 30). *Skyway-West Hill and North Highline Anti-displacement Strategies Report*. Retried from <https://kingcounty.gov/~media/depts/community-human-services/housing-homelessness-community-development/documents/Plans%20and%20Reports/KC-SkywayWHill-NHIn-ant-dsplcmnt-stratrpt.ashx?la=en>.

Levy, D.K., Comey, J., & Padilla, S. (2006). *Keeping the Neighborhood Affordable: Housing Strategies for Gentrifying Areas*. Washington, DC: The Urban Institute.

The Opportunity Agenda. (2017). *Ten Lessons for Talking About Race, Racism and Racial Justice*. Retrieved from <https://opportunityagenda.org/explore/resources-publications/ten-lessons-talking-about-race-racism-and-racial-justice>.

National Coalition for Asian Pacific American Community Development & Council for Native Hawaiian Advancement. (2017). *Asian American & Pacific Islander Anti-Displacement Strategies*. Retrieved from https://www.nationalcapacd.org/wp-content/uploads/2017/08/anti_displacement_strategies_report.pdf.

Puget Sound Regional Council. (2022). *Equitable Engagement for Comprehensive Plans*. Retrieved from <https://www.psrc.org/media/5933>.

Puget Sound Sage. (2021, May). *Disaster Gentrification in King County and How to Stop it From Happening Again*. Retrieved from <https://www.pugetsoundsage.org/research/research-equitable-development/disaster-gentrification-king-county/>.

Rothstein, R. (2017). *The Color of Law: A forgotten history of how our government segregated America*. Liveright Publishing.

SPARCC. (2021). *Investment without Displacement*. Retrieved from <https://www.sparcchub.org/pathways-to-community-prosperity/displacement/iwd-2018/>.

Spievack, N., & Okeke, C. (2020, February 26). How we should talk about Racial Disparities. Retrieved from Urban Institute: <https://www.urban.org/urban-wire/how-we-should-talk-about-racial-disparities>.

Tiesdell, S. and Allmendinger, P. (2005). Planning tools and markets: towards an extended conceptualization. In: Adams, D., Watkins, C. and White, M. (eds.) Planning, Public Policy and Property Markets. Series: Real estate issues (Oxford, England). Blackwell Publishing.

Up for Growth and EcoNorthwest. (2020). Housing Underproduction in Washington State: Economic, Fiscal, and Environmental Impacts of Enabling Transit-Oriented Accessible Growth to Address Washington's Housing Affordability Challenge.

Washington Department of Commerce (2021). Guidance for Updating Your Housing Element. Retrieved from <https://deptofcommerce.box.com/s/ig3pd55wrngxacxjwnt6hv98ue8swaj6>.

Washington Department of Commerce, Homeowner Disparities Work Group (2022). Improving Homeownership Rates for Black, Indigenous, and People of Color in Washington: Recommendations from the Homeownership Disparities Work Group. Washington Department of Commerce. Retrieved from https://app.leg.wa.gov/ReportsToTheLegislature/Home/GetPDF?fileName=Homeownership%20Disparities%20Recommendations%20Report%20-%20FINAL%20-%20Sep2022_e0b6a028-62cf-478c-aa9b-52e5e5c66609.pdf.

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).

References

ACLU. (n.d.). Predatory Lending. Retrieved from <https://www.aclu.org/issues/racial-justice/race-and-economic-justice/predatory-lending>.

American Planning Association. (2019). Planning for Equity Policy Guide. American Planning Association. Retrieved from https://planning-org-uploaded-media.s3.amazonaws.com/publication/download_pdf/Planning-for-Equity-Policy-Guide-rev.pdf.

Badger, E. (2013, August 16). The Dramatic Racial Bias of Subprime Lending During the Housing Boom. Retrieved from <https://www.bloomberg.com/news/articles/2013-08-16/the-dramatic-racial-bias-of-subprime-lending-during-the-housing-boom>.

Badger, E. (2016, May 16). Chicago Tribune. "Why a housing scheme founded in racism is making a resurgence today." Retrieved from <https://www.chicagotribune.com/business/ct-contract-selling-resurgence-20160513-story.html>.

Baker, P. C. (2016, November 2016). The Tragic, Forgotten History of Black Military Veterans. The New Yorker. Retrieved from <https://www.newyorker.com/news/news-desk/the-tragic-forgotten-history-of-black-military-veterans>.

Bates, L. K. (2013). Gentrification and Displacement Study: implementing an equitable inclusive development strategy in the context of gentrification. Commissioned by the City of Portland, Bureau of Planning and Sustainability.

- Blakemore, E. (2019, June 21). How the GI Bill's Promise Was Denied to a Million Black WWII Veterans. The sweeping bill promised prosperity for veterans. So why didn't Black Americans benefit? Retrieved from History at <https://www.history.com/news/gi-bill-black-wwii-veterans-benefits>.
- Cebul, B. (2020, July 29). Urban Renewal Meant Negro Removal. Retrieved from LA Progressive at <https://www.laprogressive.com/racism/urban-renewal>.
- City of Seattle. (n.d.). Redlining in Seattle. Retrieved from Seattle Municipal Archives at <https://www.seattle.gov/cityarchives/exhibits-and-education/online-exhibits/redlining-in-seattle>.
- Coalition, N. L., Meshede, T., Morgan, J., Aurand, A., & Threet, D. (2021). Misdirected Housing Supports: Why the Mortgage Interest Deduction Unjustly Subsidizes High-Income Households and Expands Racial Disparities. Waltham, MA: Brandeis Institute for Economic and Racial Equity.
- Communities United. (2023, 1 9). Predatory Lending. Retrieved from Communities Unlimited at <https://communitiesu.org/blog/2022/11/04/predatory-lending/>.
- Drew, R. B. (2021, August 25). Racial Inequities in the Mortgage Interest Deduction. Retrieved from Enterprise at <https://www.enterprisecommunity.org/blog/racial-inequities-mortgage-interest-deduction>.
- Gamboa, S., McCausland, P., Lederman, J., & Popken, B. (2021, June 18). Bulldozed and bisected: Highway construction built a legacy of inequality. Retrieved from NBC news at <https://www.nbcnews.com/specials/america-highways-inequality/>.
- Haugen, M. (2020, July 21). Race and Housing Series: Mortgage Interest Deduction. Retrieved from Twin Cities Habitat for Humanity at <https://www.tchabitat.org/blog/mortgage-interest-deduction>.
- Homeownership Disparities Work Group. (2022). Improving Homeownership Rates for Black, Indigenous, and People of Color in Washington, Recommendations from the Homeownership Disparities Work Group. Olympia, WA: Washington State Department of Commerce. Retrieved from <https://www.commerce.wa.gov/wp-content/uploads/2022/09/Homeownership-Disparities-Recommendations-Report-FINAL-Sep2022.pdf>.
- Honig, D. (2021, October 29). Redlining in Seattle. Retrieved from History Link at <https://www.historylink.org/File/21296>.
- Howell, J., & Korver-Glenn, E. (2020, September 24). Race determines home values more today than it did in 1980. Retrieved from Rice University Kinder Institute for Urban Research, Urban Edge at <https://kinder.rice.edu/urbanedge/race-determines-home-values-more-today-it-did-1980>.
- King, N. (2021, April 7). A Brief History Of How Racism Shaped Interstate Highways. Retrieved from NPR at <https://www.npr.org/2021/04/07/984784455/a-brief-history-of-how-racism-shaped-interstate-highways>.
- Miller, G. (2017, December 15). Maps Show How Tearing Down City Slums Displaced Thousands. In the 1950s and '60s federally funded projects displaced hundreds of thousands of people in American cities. National Geographic.
- National Park Service. (March 2021). Civil Rights in America: Racial Discrimination in Housing. Washington, DC: National Park Service, US Department of the Interior.

Office of the Secretary of Transportation. (2017). Beyond Traffic: 2045 Final Report. Washington, DC: US Department of Transportation.

Perry, A. M., Rothwell, J., & Harshbarger, D. (2018, November 27). The devaluation of assets in Black neighborhoods. Retrieved from Brookings at <https://www.brookings.edu/research/devaluation-of-assets-in-black-neighborhoods/>.

Rait, J. M. (2022). Ending Zoning's Racist Legacy. Chicago, IL: American Planning Association.

Rothstein, R. (2017, May 30). The Racial Segregation of American Cities Was Anything but Accidental. (S. M. Katie Nodjimbadem, Interviewer)

Schwab, K. (2018, January 4). The Racist Roots Of "Urban Renewal" And How It Made Cities Less Equal. Retrieved from Fast Company at <https://www.fastcompany.com/90155955/the-racist-roots-of-urban-renewal-and-how-it-made-cities-less-equal>.

Seattle Civil Rights and Labor History Project. (2020). Racial Restrictive Covenants. Retrieved from University of Washington at <https://depts.washington.edu/civilr/covenants.htm>.

Spievack, N., & Okeke, C. (2020, February 26). How we should talk about Racial Disparities. Retrieved from Urban Institute at <https://www.urban.org/urban-wire/how-we-should-talk-about-racial-disparities>.

The Conversation. (2020, September 24). Homes in Black and Latino Neighborhoods Still Undervalued 50 Years After U.S. Banned Using Race In Real Estate Appraisals. Retrieved from US News at <https://www.usnews.com/news/cities/articles/2020-09-24/homes-in-black-and-latino-neighborhoods-still-undervalued-50-years-after-us-banned-using-race-in-real-estate-appraisals>.

The Opportunity Agenda. (2017). Ten Lessons for Talking About Race, Racism and Racial Justice. Retrieved from <https://opportunityagenda.org/explore/resources-publications/ten-lessons-talking-about-race-racism-and-racial-justice>.

United States Department of Justice. (2021, October 22). Assistant Attorney General Kristen Clarke Delivers Remarks Announcing a New Initiative to Combat Redlining. Retrieved from United States Department of Justice at <https://www.justice.gov/opa/speech/assistant-attorney-general-kristen-clarke-delivers-remarks-announcing-new-initiative>.

University of Minnesota. (2022). What is a Covenant? Retrieved from Mapping Prejudice at <https://mappingprejudice.umn.edu/racial-covenants/what-is-a-covenant>.

Up for Growth and EcoNorthwest. (2020). Housing Underproduction in Washington State: Economic, Fiscal, and Environmental Impacts of Enabling Transit-Oriented Accessible Growth to Address Washington's Housing Affordability Challenge.

Welsh, N. H. (2018). Racially Restrictive Covenants in the United States: A Call to Action. *Agora Journal of Urban Planning and Design*, 130-142.

Zonta, M. (2019, July 15). Racial Disparities in Home Appreciation. Retrieved from Center for American Progress at <https://www.americanprogress.org/article/racial-disparities-home-appreciation/>.

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](https://www.huduser.gov/portal/datasets/cp.html)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

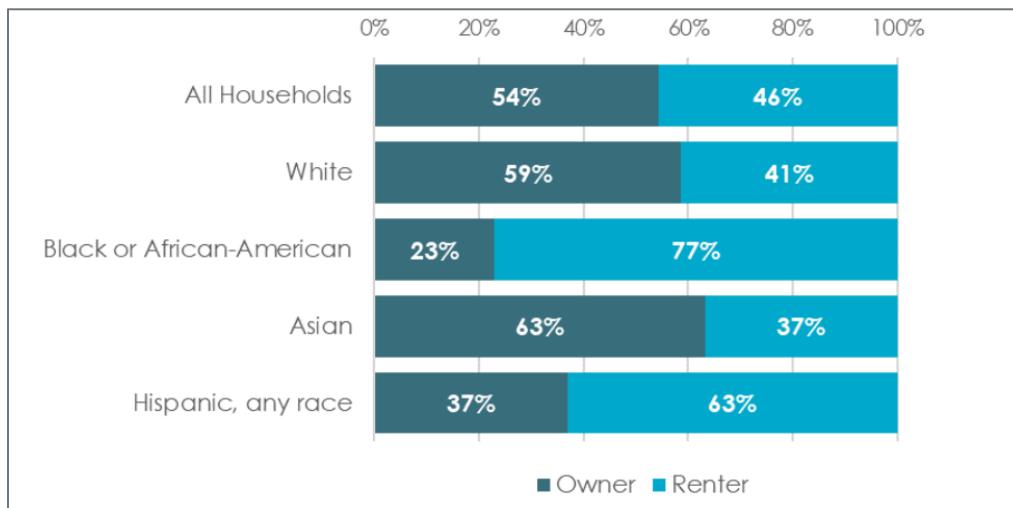
Direct measures of racially disparate impacts in housing

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.

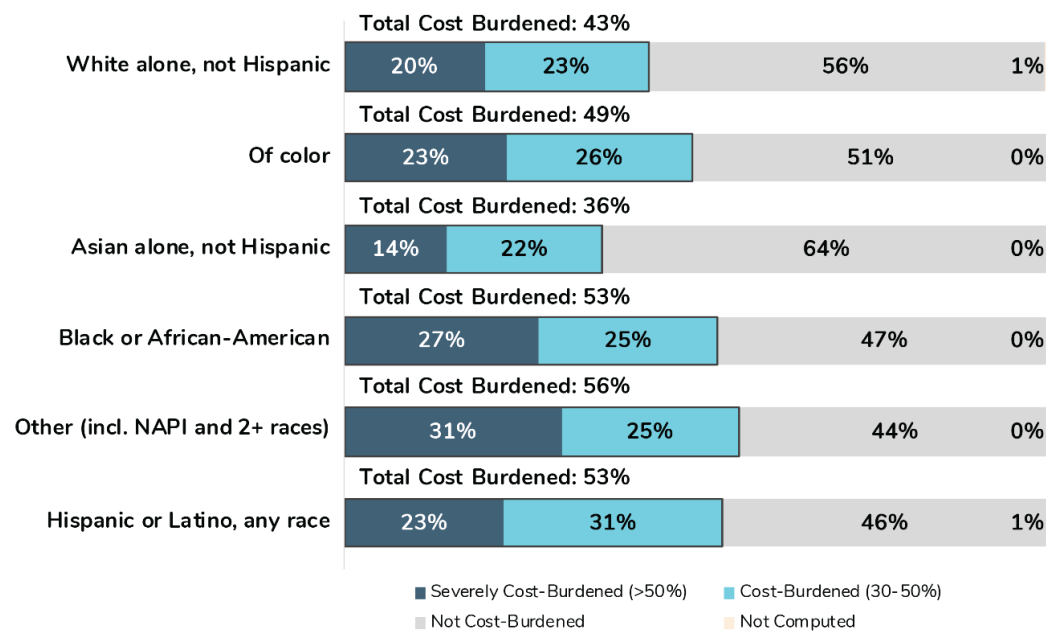
Exhibit 18. CHAS table structure for analyzing cost burden by racial group names for owner households, CHAS 2015 – 2019

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.

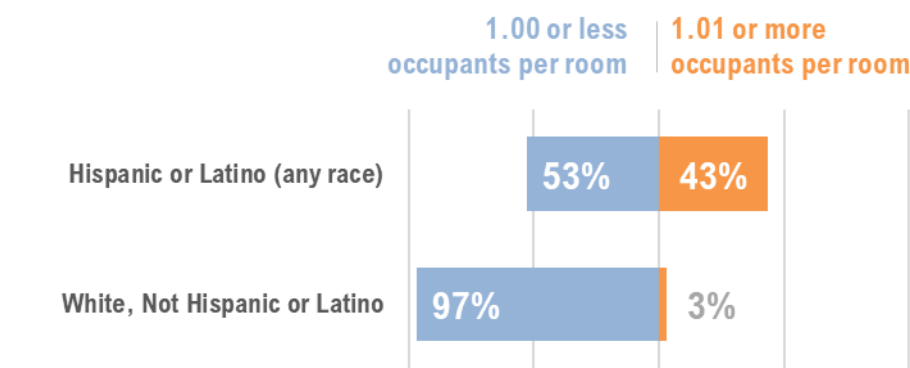
The ACS Table B25014 and subtables A – I provide estimates on occupants per room disaggregated by the race of the householder. This information can be used to understand differences in overcrowding among different populations. Exhibit 20 provides an example analysis from the City of Yakima (2020 data) 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

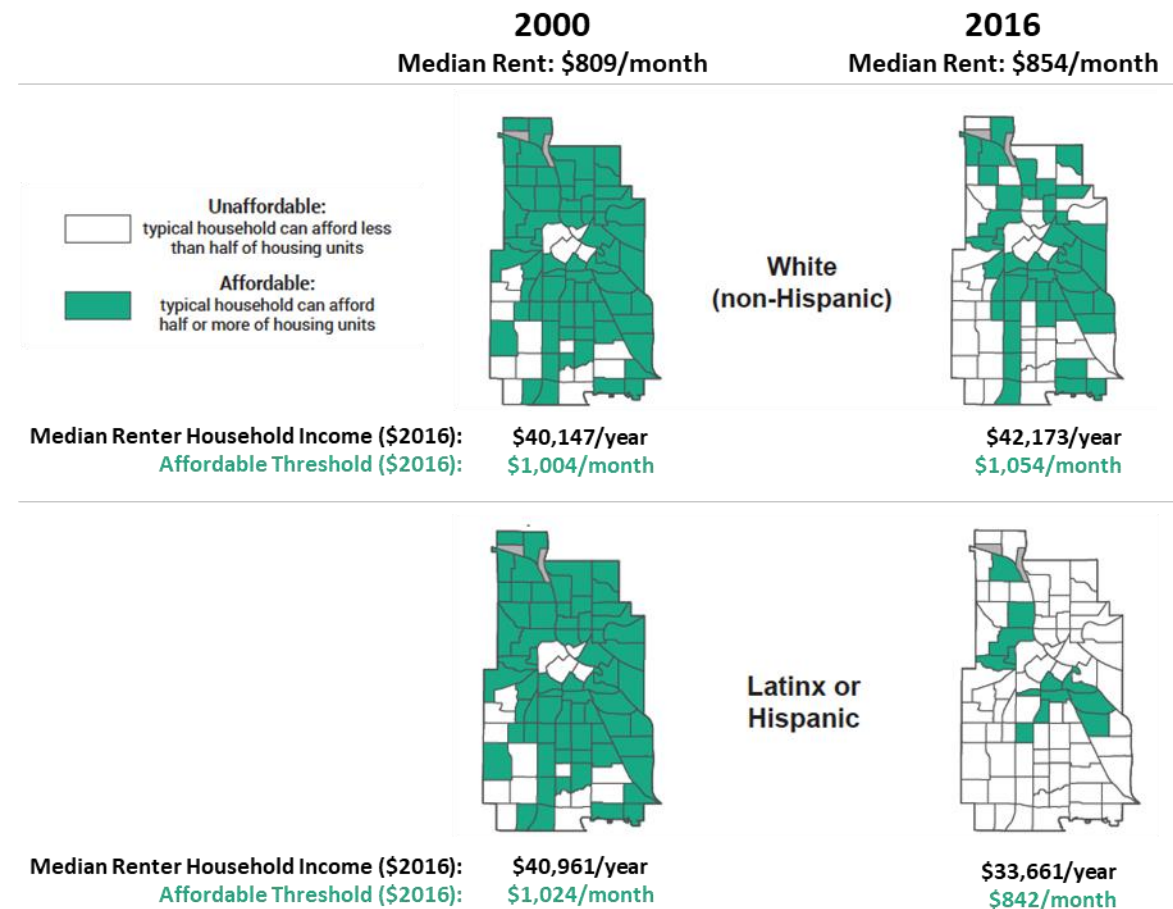
Neighborhood access is the ability of a household to access housing in a specific neighborhood. Neighborhood access can be assessed by comparing household incomes to housing costs. Long standing patterns of discrimination in housing, lending and community investment has contributed to racial disparities 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

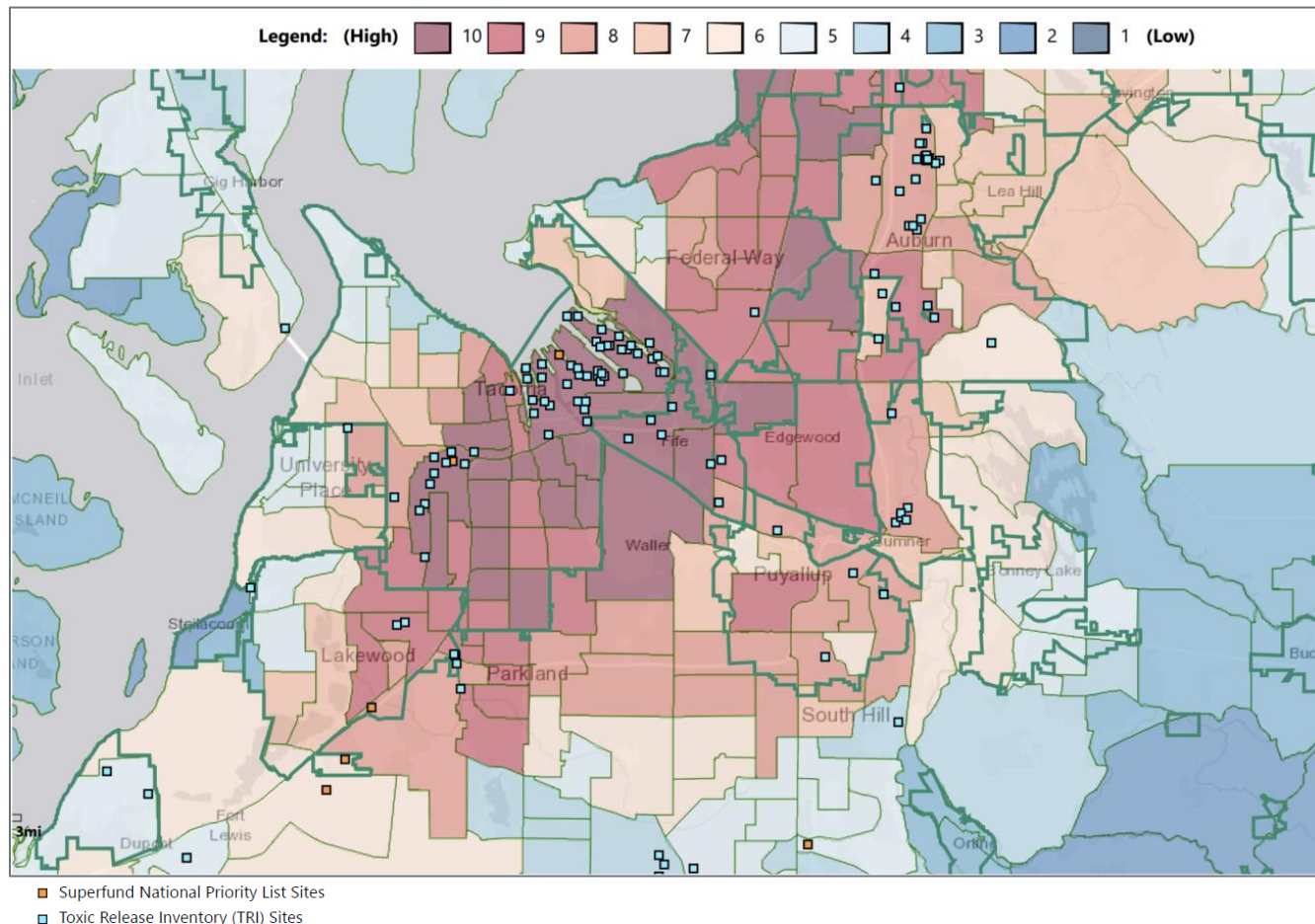
The Washington State Department of Health, together with the University of Washington Department of Environmental & Occupational Health Sciences (DEOHS), compiles information on environmental health and hazard risk information for each census tract in Washington state. The dataset allows the user to 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.

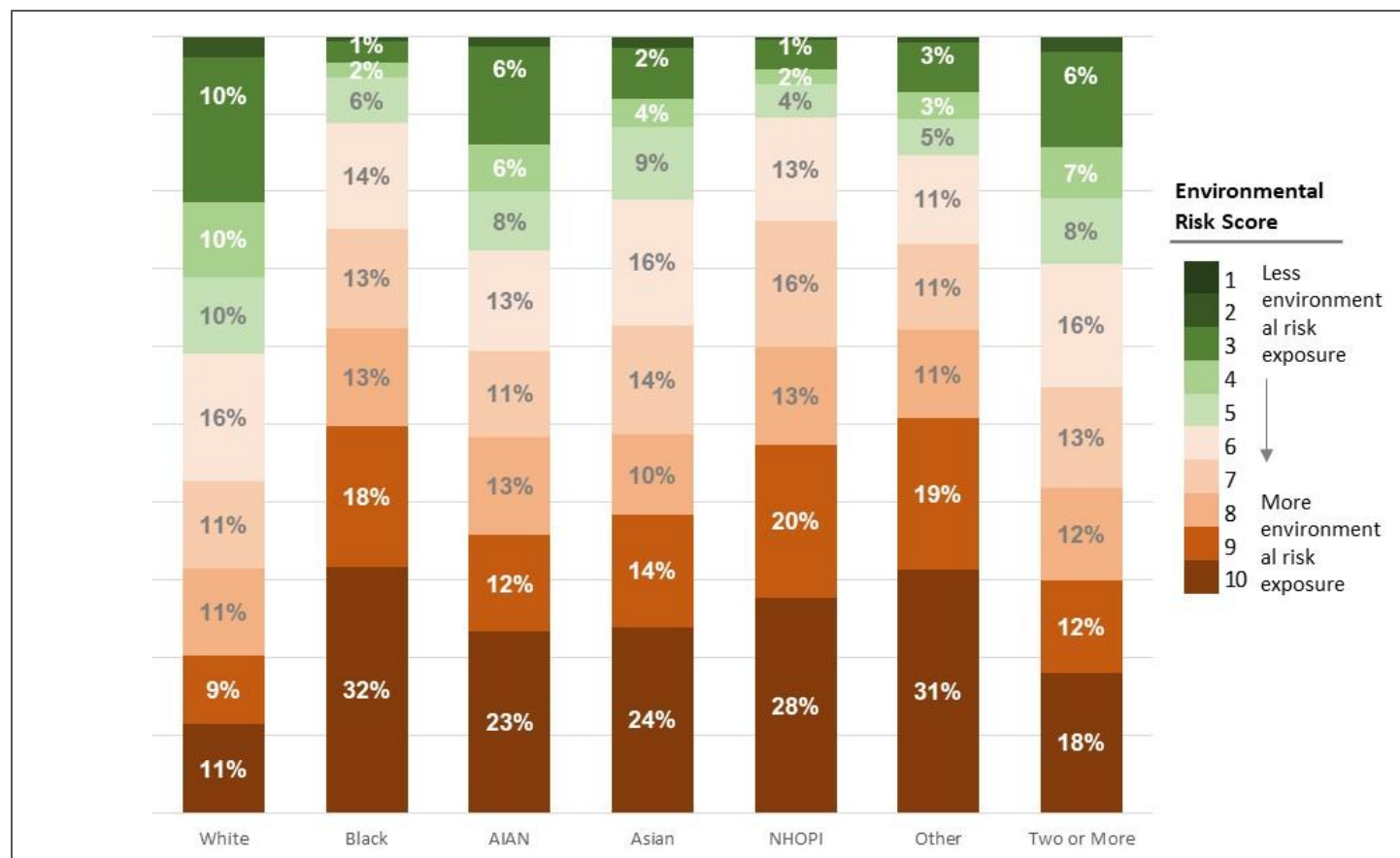
Exhibit 23. Environmental exposure risk index, Pierce County, 2022



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 Health](#)¹⁰¹
- 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](#).

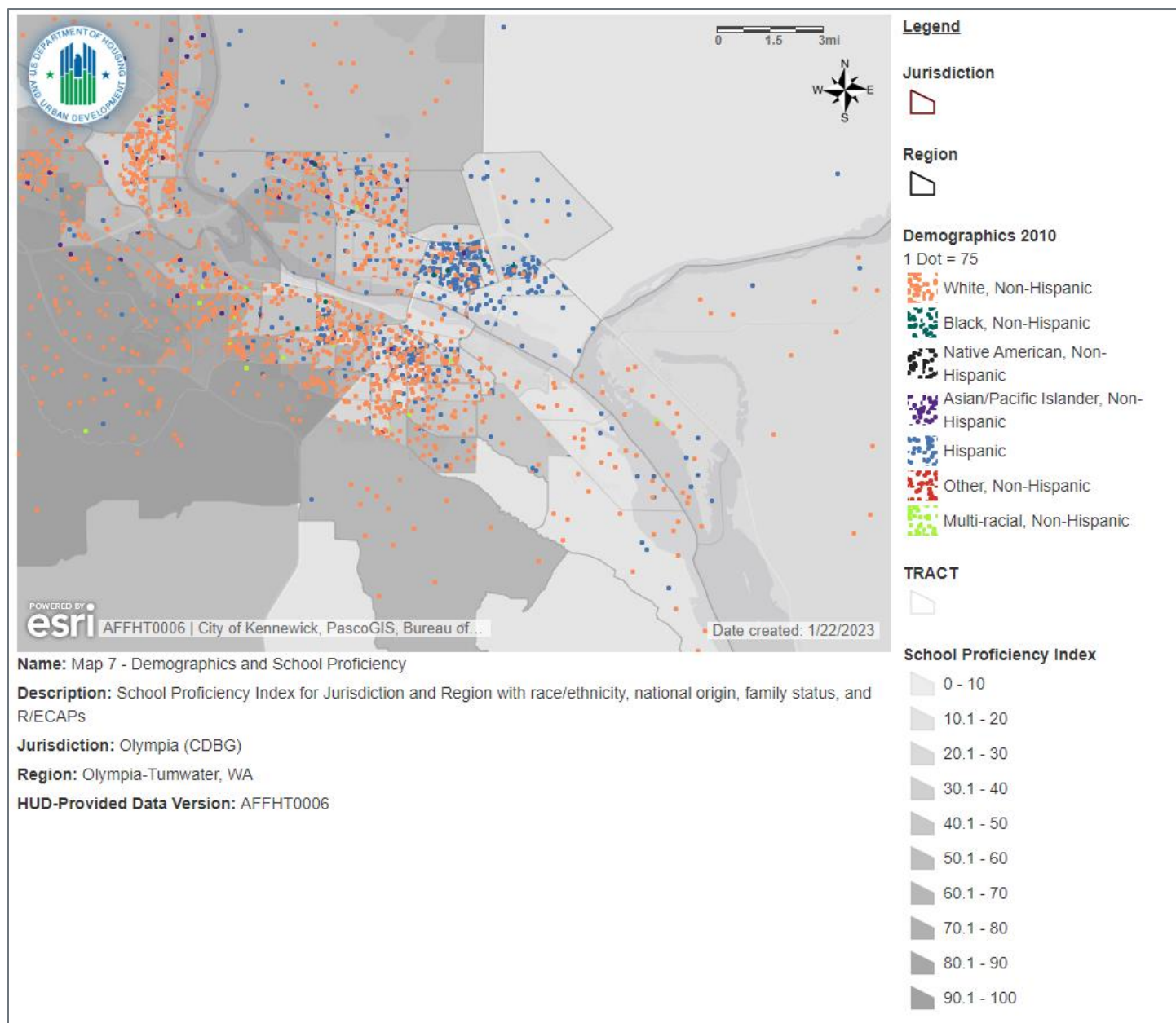
HUD's [Affirmatively Furthering Fair Housing resources](#) Map 7 maps a School Proficiency Index by block group. The School Proficiency Index uses school-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and 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 Framework](https://www.k12.wa.us/policy-funding/grants-grant-management/every-student-succeeds-act-essa/washington-school-improvement-framework)¹⁰⁵ (for school quality)
- HUD's [Affirmatively Furthering Fair Housing Tool](https://egis.hud.gov/affht/),¹⁰⁶ including Map 7 (Demographics and School Proficiency)
- [OSPI](https://www.k12.wa.us/data-reporting/data-portal)¹⁰⁷ 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

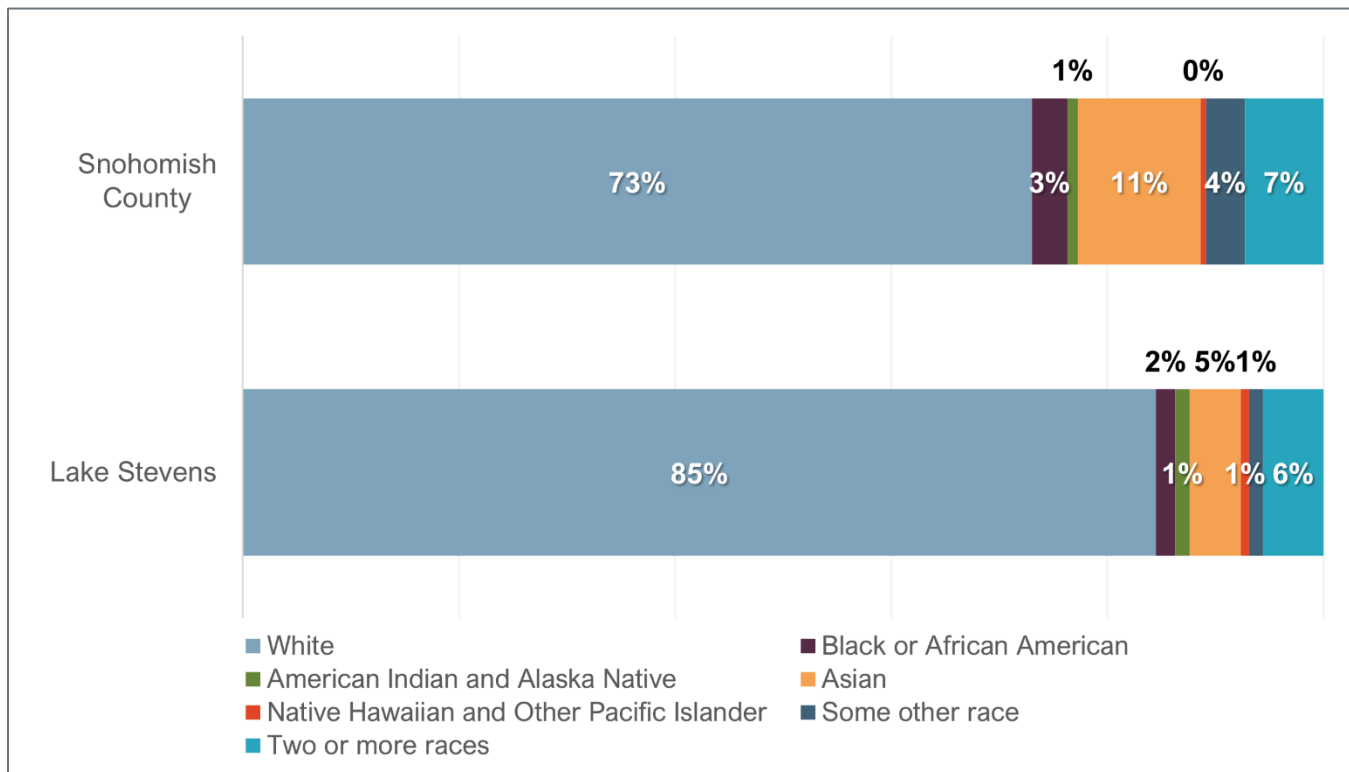
Exclusion refers to the act or effect of shutting or keeping certain populations out of housing within a specified area, in a manner that may be intentional or unintentional, but which nevertheless leads to non-inclusive impacts.

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

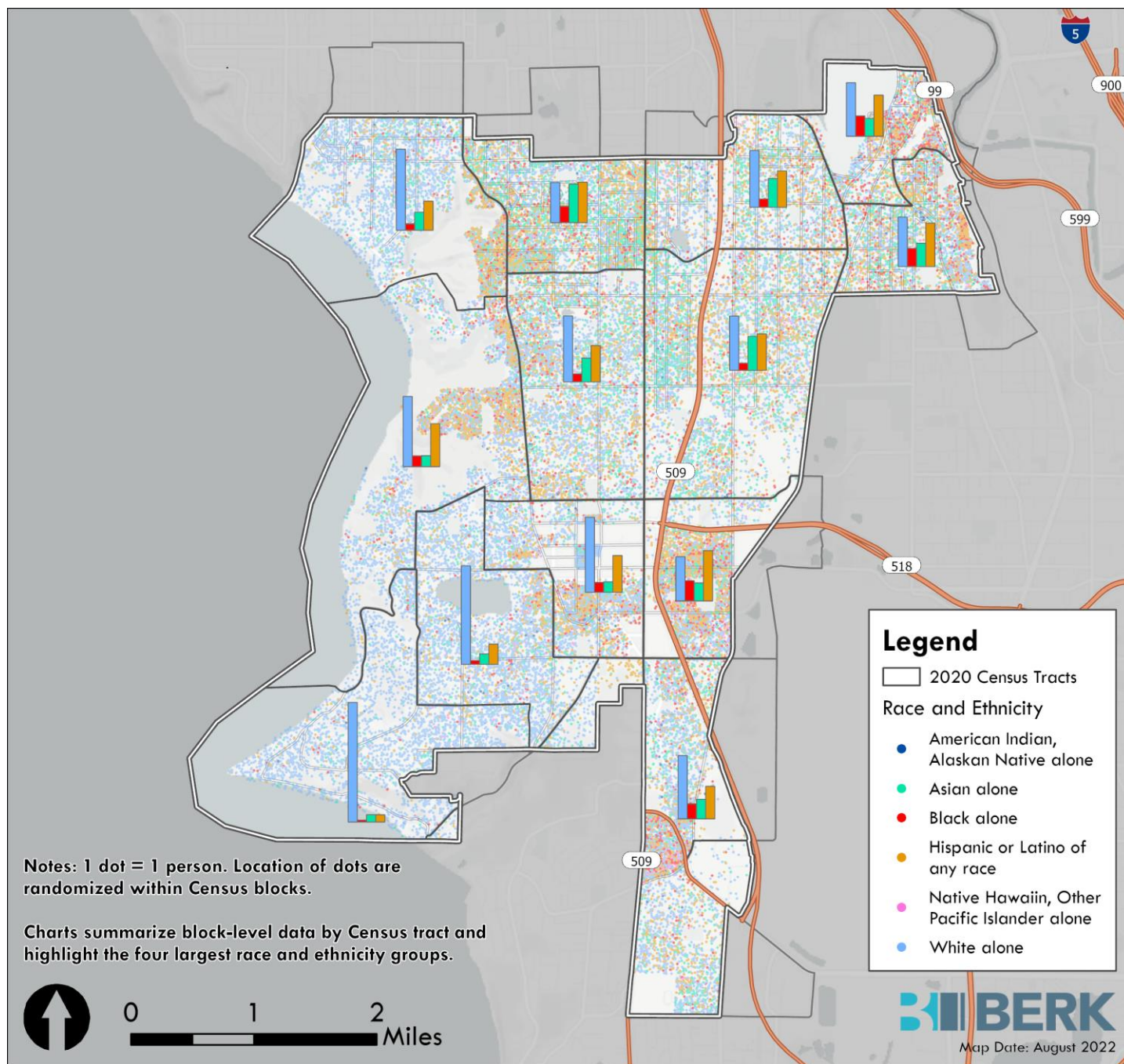
Dot density or dot distribution maps

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



Sources: US Census Redistricting Data (PL 94-171), 2020; BERK 2022

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)

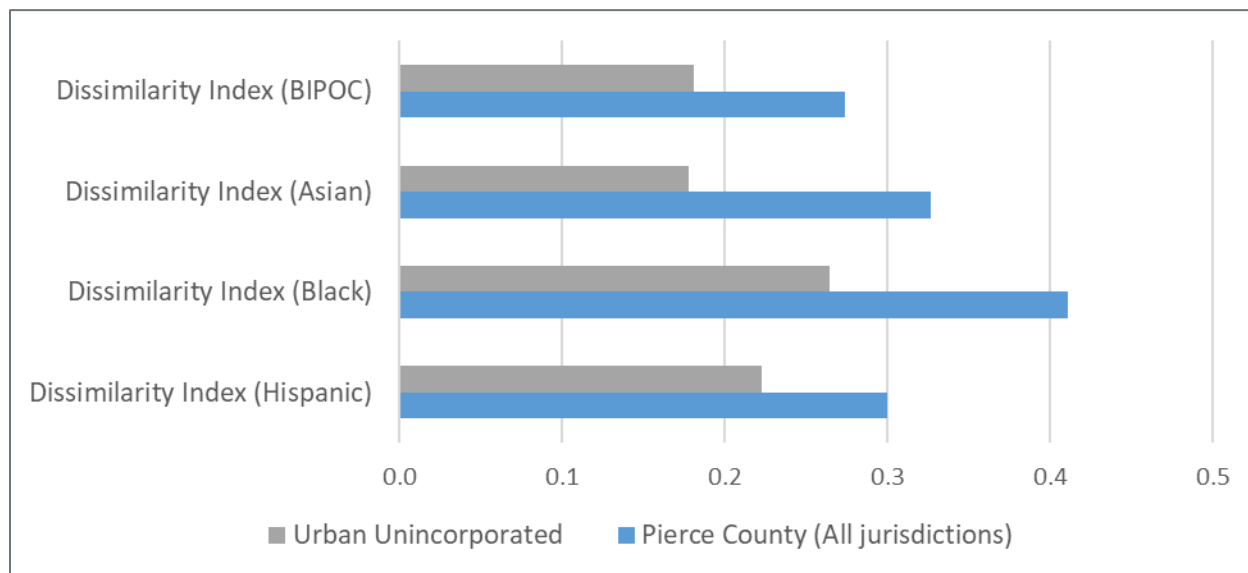
Dissimilarity index

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

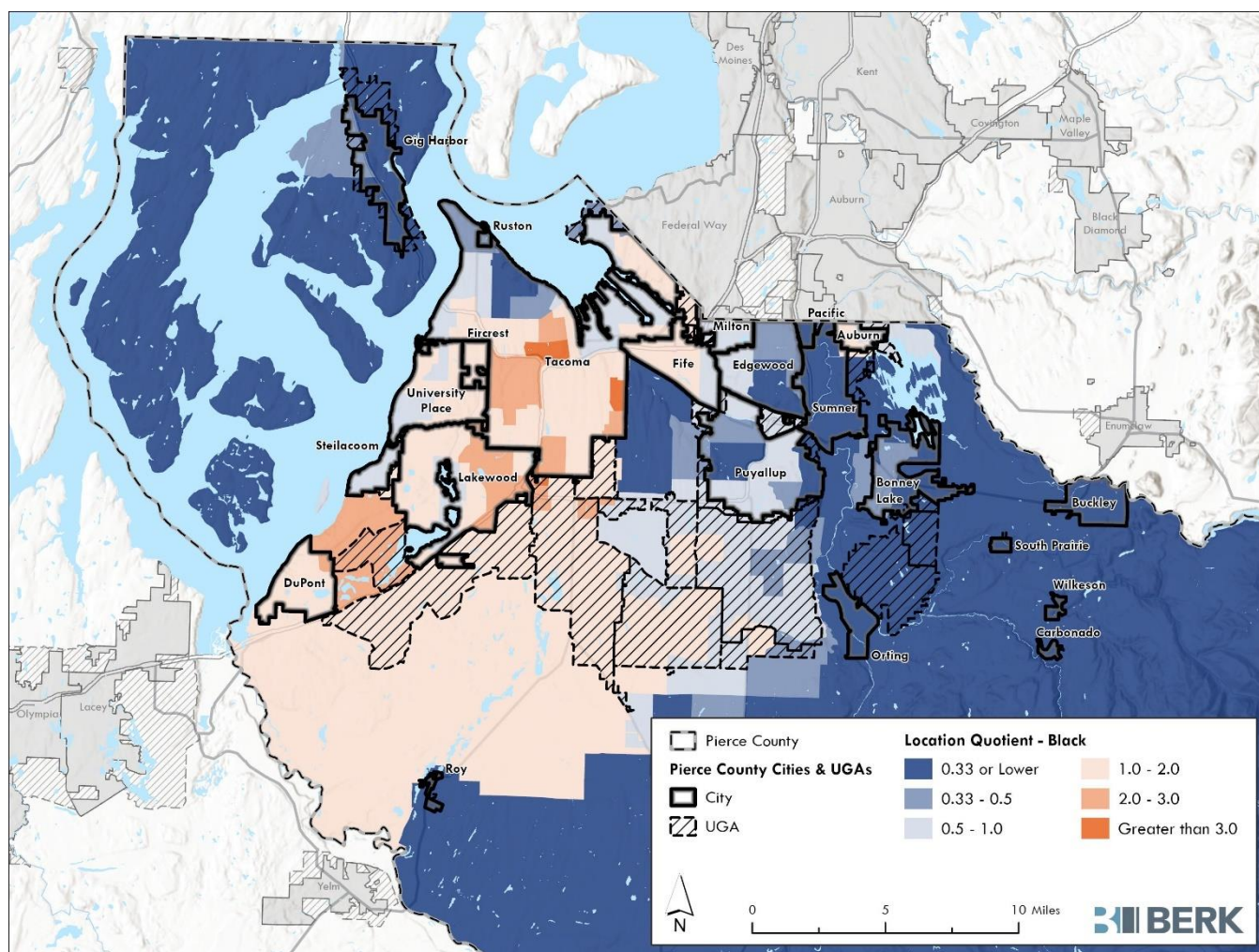
Another way to assess segregation is by using a location quotient. The location quotient is a measure of how concentrated a particular demographic group is within an area. The metric requires two geographic units – a smaller tabulation area, often a census tract, and the reference geographic unit, often 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.

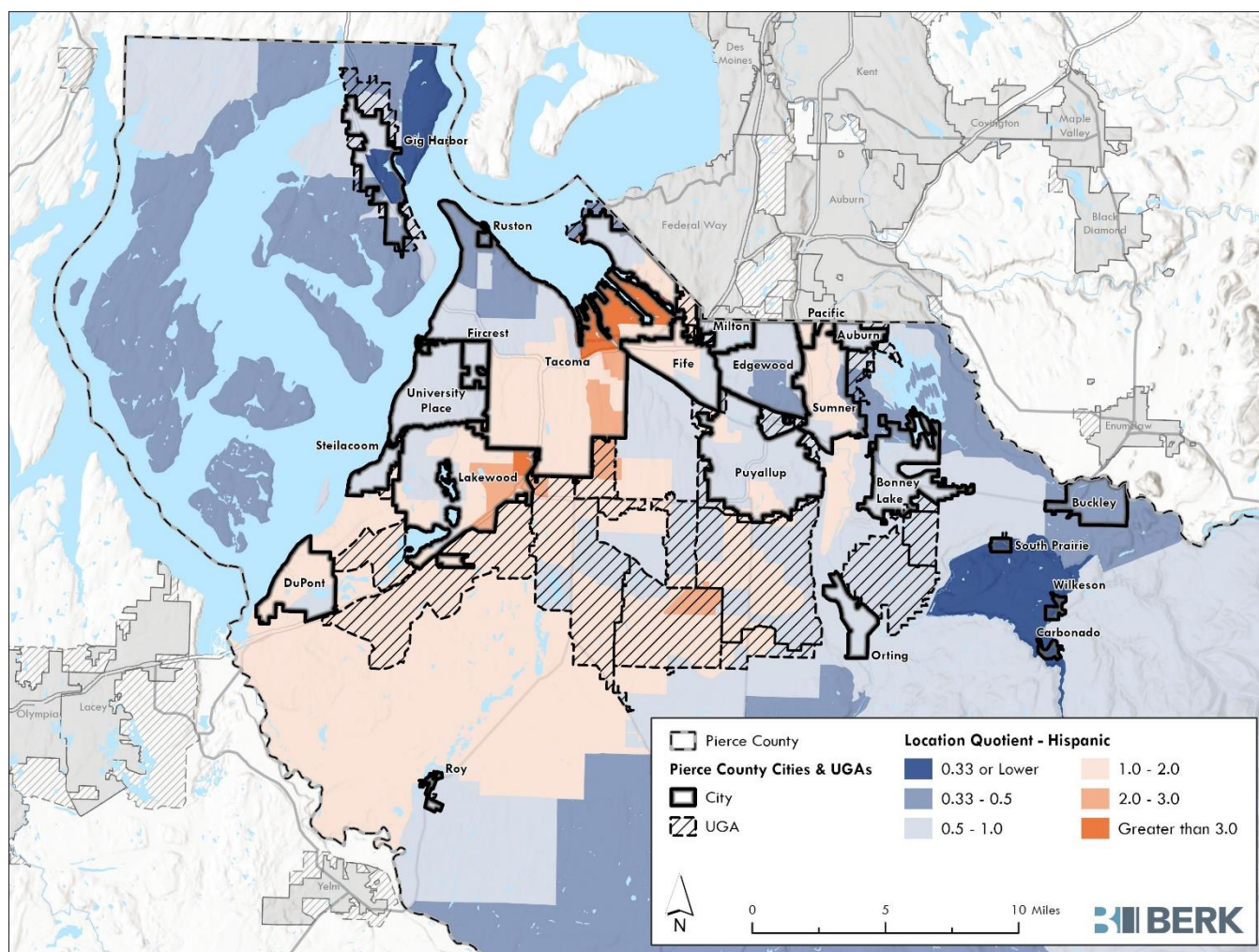
Exhibit 29. Location quotient for Black residents in Pierce County



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).

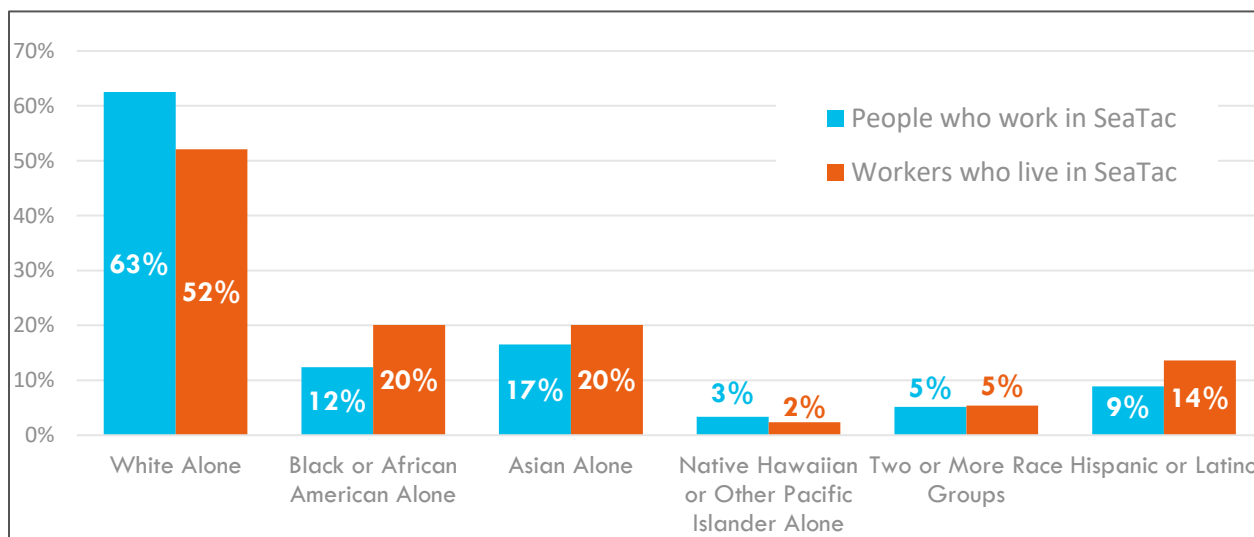
Comparison of workers and residents

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

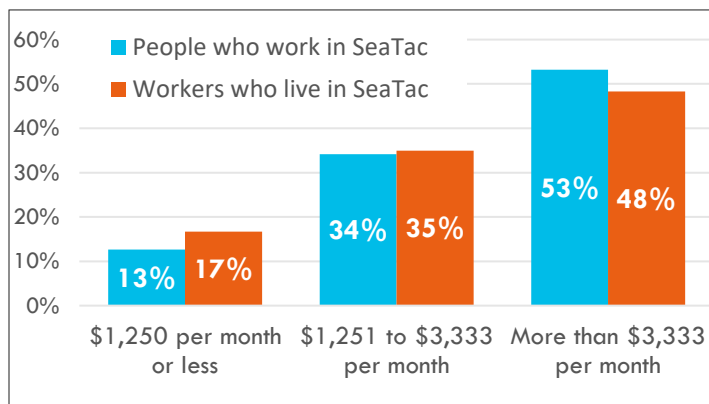


Source: U.S. Census Bureau, OnTheMap Application and LEHD Origin-Destination Employment Statistics, 2019

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.

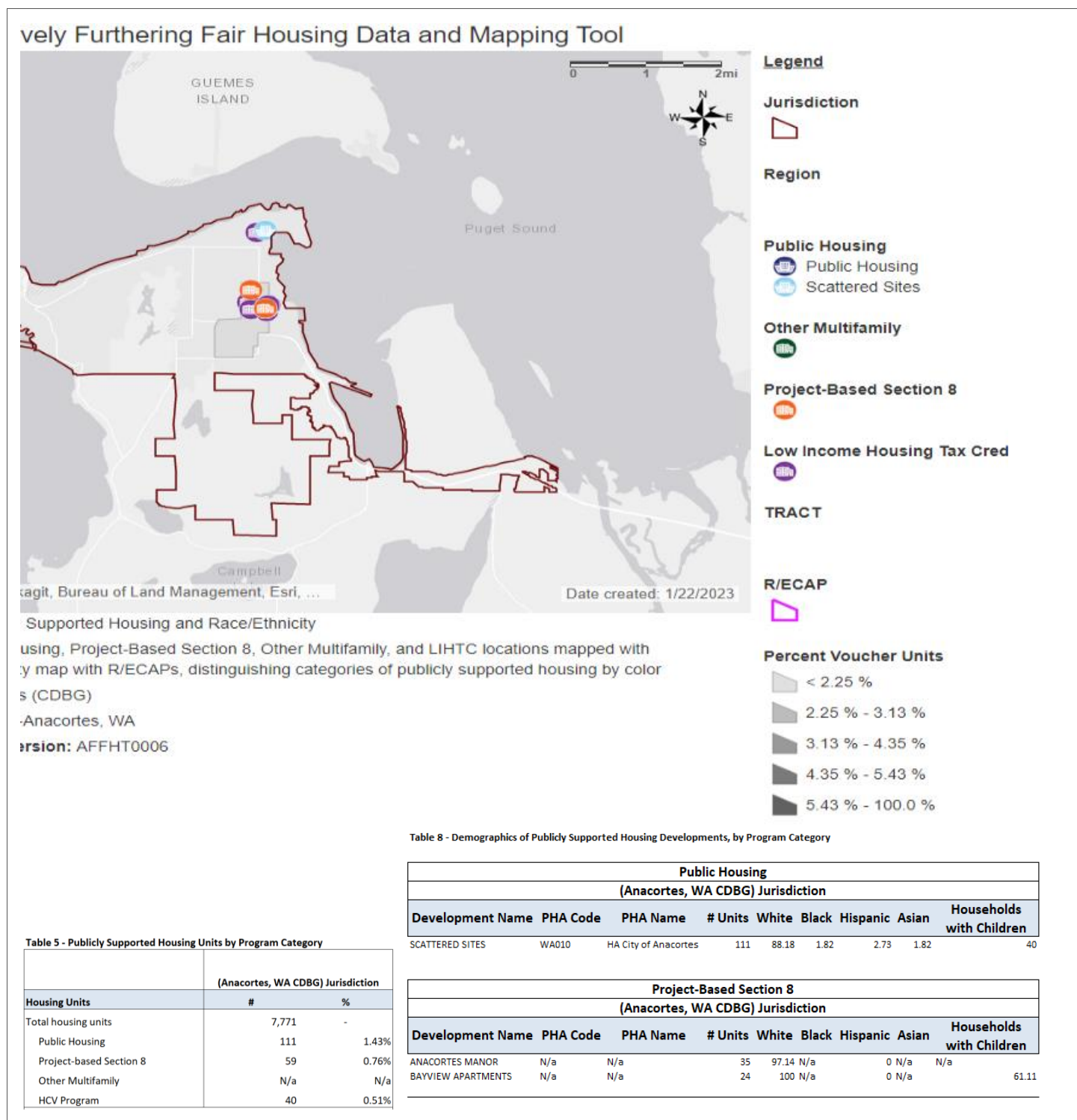
Data on publicly supported affordable housing is maintained by various administrative agencies. There are national datasets for federally supported housing, datasets for state supported housing, and your local jurisdiction may have locally supported or privately funded income-qualified housing. For federal 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).

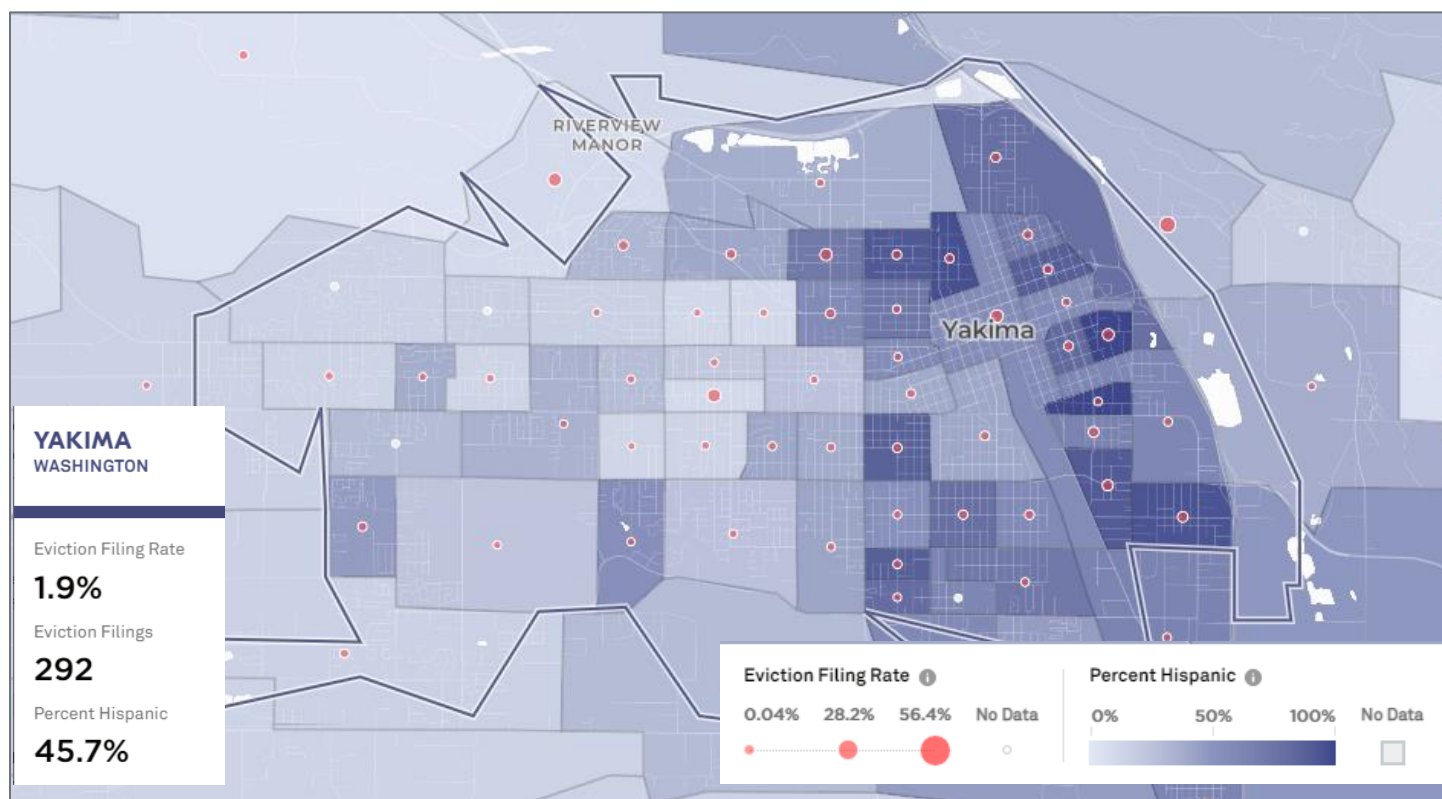
Eviction filings are public record and can be reviewed by potential property owners when conducting background checks on potential renters. Property owners can legally use a person's eviction history to reject a potential renter, creating a persistent barrier to accessing rental housing and increasing 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.

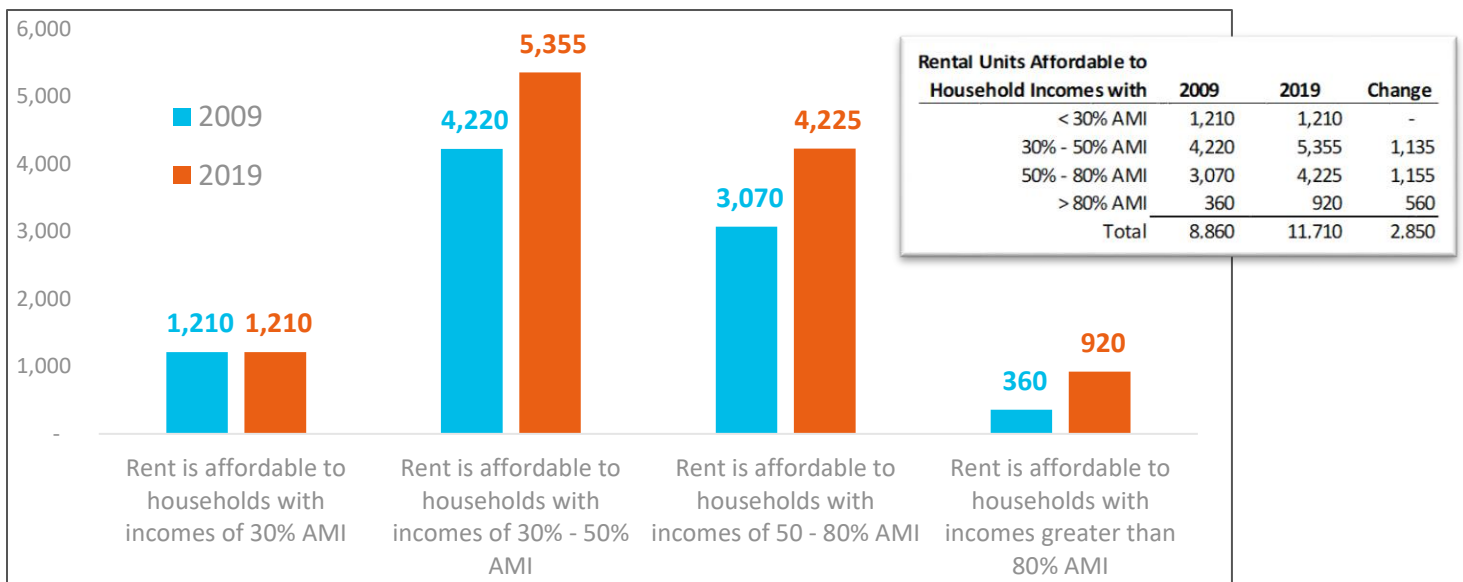
Source: US Census, American Community Survey 5-Year Estimates (Table B25024); Walla Walla Regional Housing Action Plan, FCS Group, 2021

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 provide 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.

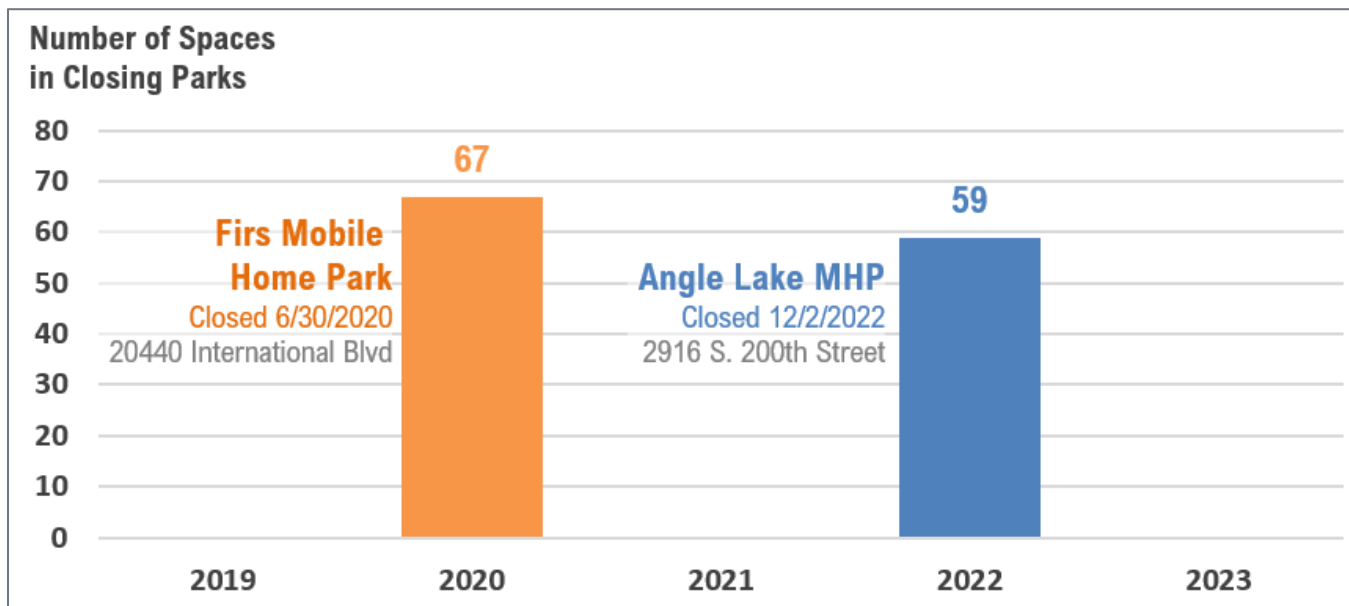
The primary benefit to the homeowner is that by owning the housing unit, the monthly costs are less expensive than similarly sized homes elsewhere. Many residents of MHPs value the configuration of small units that are not attached to one another, allow for private exterior spaces, enable residents to 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/>

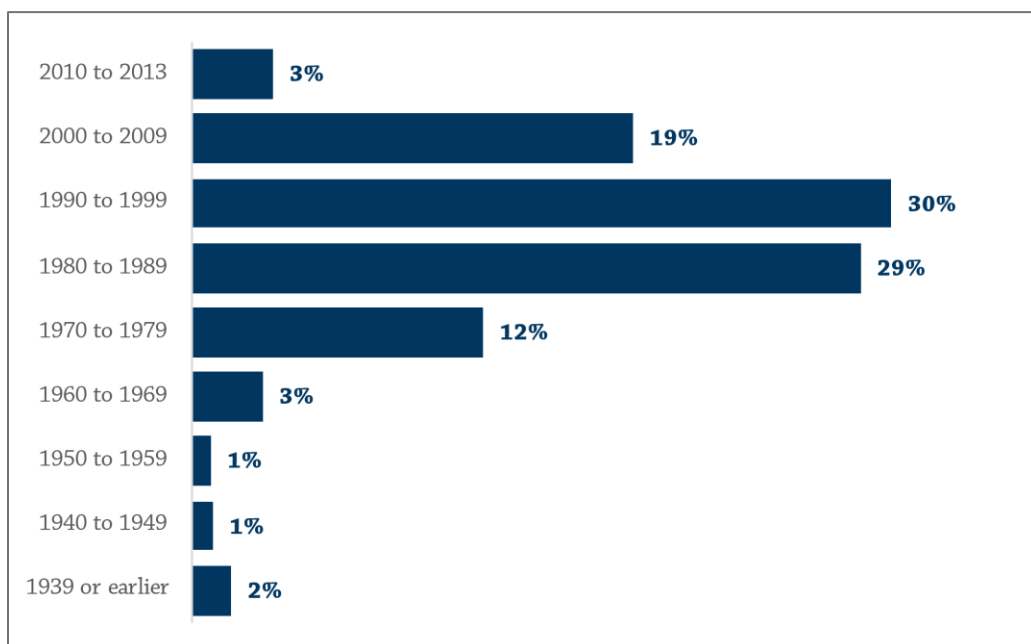
¹²⁷<https://www.fema.gov/openfema-data-page/housing-assistance-program-data-owners-v2>

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.

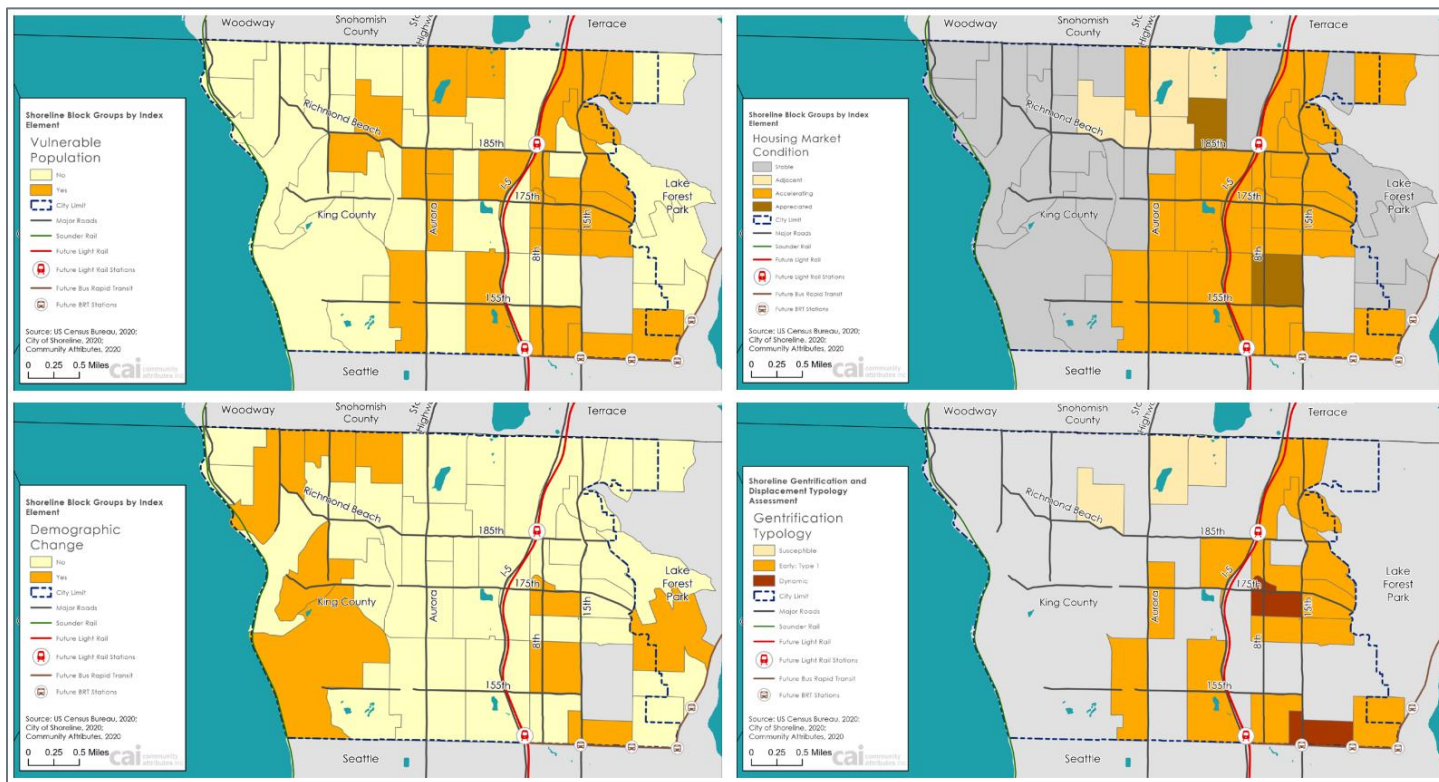
Exhibit 39. Neighborhood states of gentrification typology, City of Portland, 2013

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

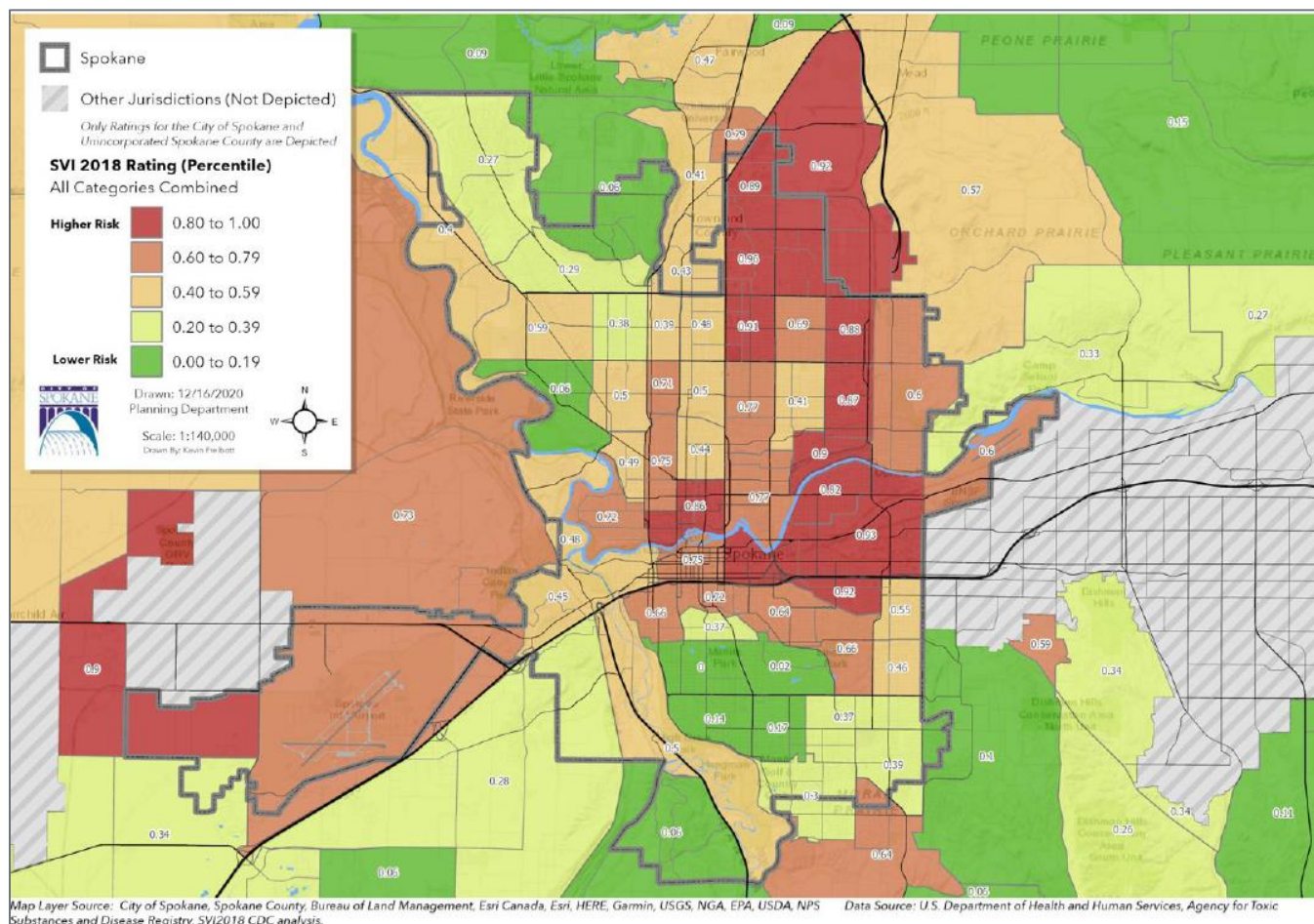
One of the primary components of assessing displacement risk is understanding the social vulnerability of a specific community based on social and demographic factors. Typically, an analysis includes consideration of more than one variable. There are some options of off-the-shelf indices designed to 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

References

- Bates, L. K. (2013). Gentrification and Displacement Study: Implementing an Equitable Inclusive Development Strategy in the Context of Gentrification. Urban Studies and Planning Faculty Publications and Presentations. Retrieved from https://pdxscholar.library.pdx.edu/usp_fac/83/.
- Census, U. (2021). Housing Patterns: Appendix B: Measures of Residential Segregation. Retrieved from [www.Census.gov: https://www.census.gov/topics/housing/housing-patterns/guidance/appendix-b.html](https://www.census.gov/topics/housing/housing-patterns/guidance/appendix-b.html).
- Cohen, M., & Pettit, K. L. (2019). Guide to Measuring Neighborhood Change to Understand and Prevent Displacement. Retrieved from Urban Institute, National Neighborhood Indicators Partnership at https://www.urban.org/sites/default/files/publication/100135/guide_to_measuring_neighborhood_change_to_understand_and_prevent_displacement.pdf.
- HUD. (2007). Measuring Overcrowding in Housing. U.S. Department of Housing and Urban Development.

Kober, E. (2021). The Jobs-Housing Mismatch: What It Means for U.S. Metropolitan Areas. Retrieved from the Manhattan Institute at <https://www.manhattan-institute.org/jobs-housing-mismatch-what-it-means-metropolitan-areas>.

The Evictions Study. (2022). Washington Evictions Study Map. University of Washington.

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 <i>Parks Plan, Equitable and Sustainable Access</i>. 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

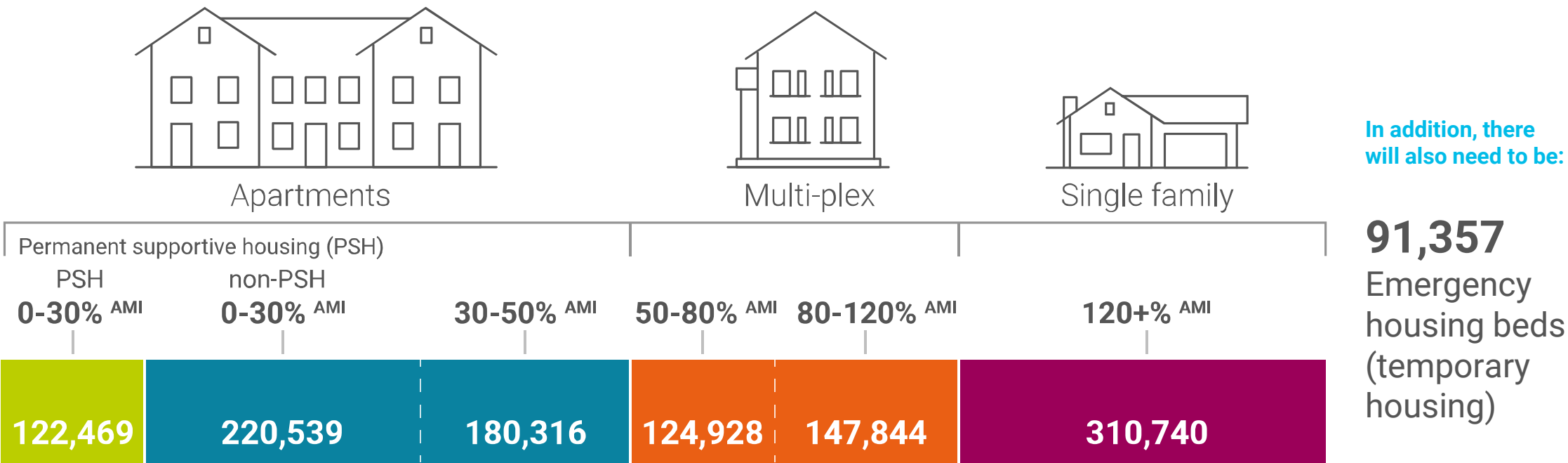
New Housing Element Requirements (HB 1220)

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)



Item 5.

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

	Total	Affordability Level (% of Area Median Income)						
		0-30%						
		Non-PSH	PSH	30-50%	50-80%	80-100%	100-120%	120%+
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

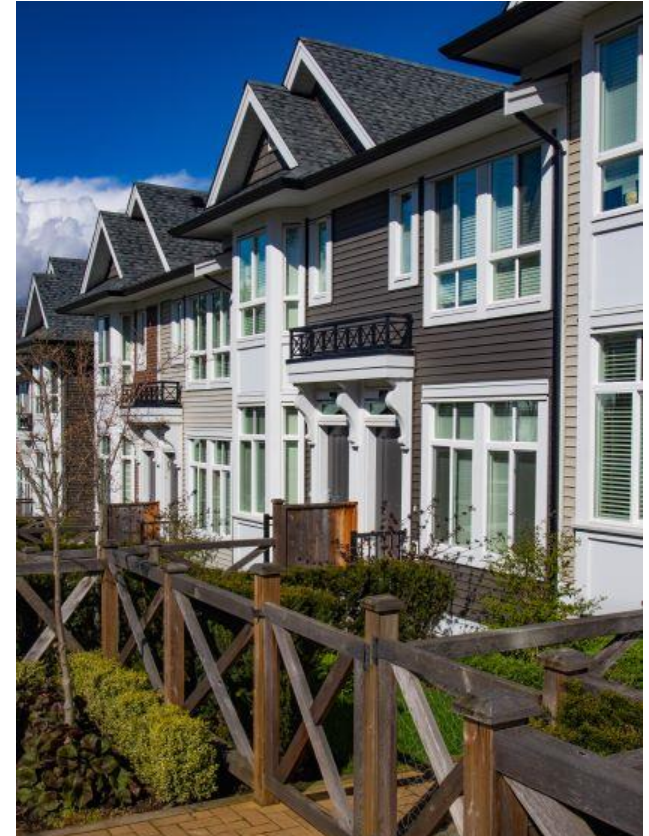
Book 2: Guidance for Updating Your Housing Element

- 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

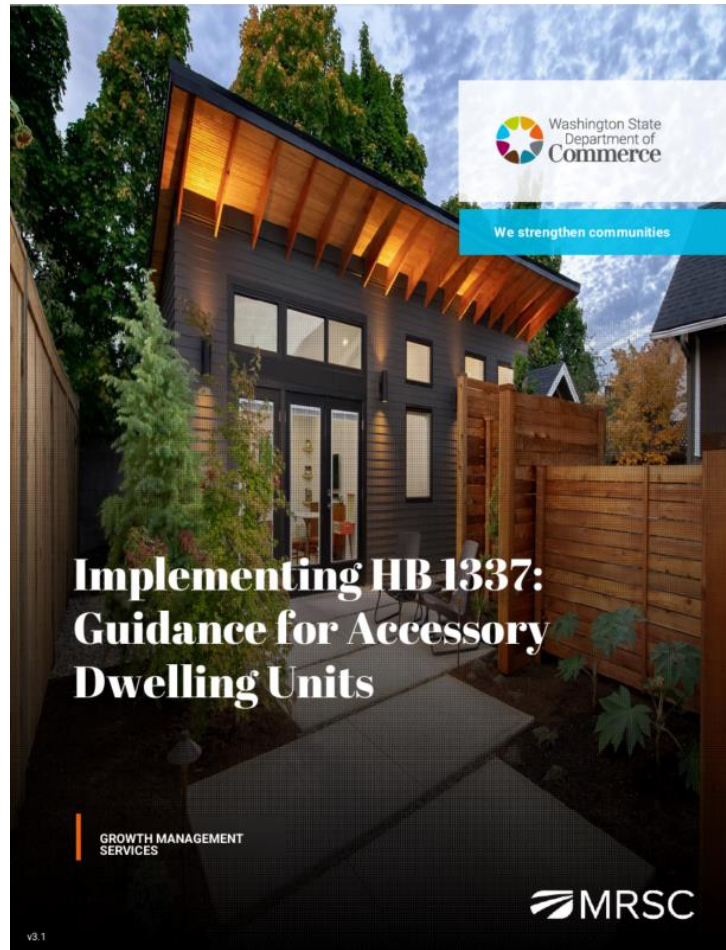
2015 – 2022 (due with update)

- 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 5.</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	* On all predominantly residential lots, unless zoning permits higher densities

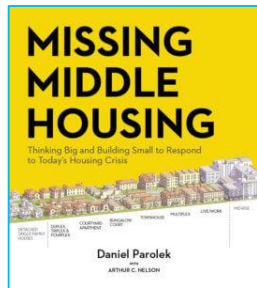
Commerce implementation of HB 1110

- **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](#)





Washington State
Department of
Commerce

www.commerce.wa.gov



Thank you!

Anne Fritzel, AICP
HOUSING PROGRAMS MANAGER

Anne.Fritzel@commerce.wa.gov

360-259-5216

HOUSING AND HUMAN SERVICES ELEMENT

CHAPTER 3



TABLE OF
CONTENTS



INTRODUCTION..... HHS-3

Access to resources HHS-3

Guiding Principles HHS-4

MAJOR CONDITIONS HHS-5

GOALS AND POLICIES HHS-6

Access to Human Services HHS-6

GOAL 3.1 SUPPORT EFFECTIVE AND ACCESSIBLE HUMAN SERVICES HHS-6

GOAL 3.2 ALLOCATE GENERAL FUNDS FOR SERVICES..... HHS-7

GOAL 3.3 UTILIZE PARTNERSHIPS HHS-7

Variety of Housing Types..... HHS-8

GOAL 3.4 INCREASE HOUSING VARIETY..... HHS-8

Neighborhood Preservation HHS-8

GOAL 3.5 STRENGTHEN EXISTING NEIGHBORHOODS HHS-8

Housing Affordability HHS-9

GOAL 3.6 INCREASE HOUSING OPPORTUNITIES FOR ALL..... HHS-9

Special Needs Housing..... HHS-11

GOAL 3.7 ENCOURAGE A VARIETY OF HOUSING OPPORTUNITIES FOR SPECIAL NEEDS POPULATIONS..... HHS-11

Mobile Home Park Maintenance..... HHS-11

GOAL 3.8 MAINTAIN MOBILE HOME PARKS HHS-11

Mobile Home Relocation..... HHS-12

GOAL 3.9 MINIMIZE IMPACTS OF MOBILE HOME RELOCATION..... HHS-12

RECOMMENDED IMPLEMENTATION STRATEGIES HHS-13



INTRODUCTION

The Housing and Human Services Element seeks to strengthen and sustain a place where children, families, and individuals can thrive, neighbors care for each other, and residents partake in a just and thriving community for all. This Element addresses housing and social services, which are often integrally related. It establishes the policy context for regulations and programs that provide for an adequate housing supply for the projected population at all income levels, maintain housing quality, and protect existing single-family neighborhoods. It also establishes the policy context for Human Services programs and actions that serve community members with varying needs. While the goals and policies of this element apply citywide, they emphasize concentrating opportunities in the Urban Center and station areas, where transportation options can reduce transportation costs for lower income households.

This Element is coordinated with the Land Use, Transportation, Economic Vitality, and Parks, Recreation, and Open Space Elements to ensure a consistent approach to providing access to the above resources. Additional housing goals and policies can be found in the City Center Plan.

Access to resources

SeaTac's housing and human services work aims to ensure that all residents have access to basic necessities and resources for a good quality of life, including:

- Safe and affordable housing,
- Adequate and nutritious food,
- Access to quality health care,
- A living wage to support self and family,
- Affordable and available community activities,
- Universal quality education,
- High quality affordable childcare,
- Freedom from physical harm as well as mental and emotional coercion, and
- Economic, environmental, and social stability.

"Human services" are defined as those services that address the following needs of SeaTac residents:

- Basic human needs, including the need for food, clothing, shelter, and primary health care.
- Social support, especially in times of personal and family crisis. Social support services include counseling, outreach, peer support, employment and training programs, child day care programs, and preventive education.
- Treatment for illnesses or disabling conditions such as physical illness, mental illness, and substance abuse.
- Help in gaining access to available, appropriate services including transportation and information and referral programs.

Guiding Principles

The following principles guide this Element:

- Every person is valuable, and meeting basic human needs for all is essential. People must not be devalued for being in need, nor during service delivery.
- Collaborative partnerships must be established between funders, government, educators, human service providers, media, police, the criminal justice system, and the community at large to ensure basic human needs are met in a humane and holistic manner.
- Human services must be operated, staffed, and funded in a way that allows for services to be accessible across a broad spectrum of need.
- A continuum of human services that increases self reliance and strengthens individuals, children, and families must be provided.
- Increasing access and promoting awareness of human services improves health and well being.
- Working with nearby jurisdictions to fund and administer human services improves and integrates systems.
- Programs must be monitored and should respond to changing needs.

See Framework Policy 1.1A regarding community engagement and public participation



MAJOR CONDITIONS

SeaTac's major housing and human services conditions include:

- Property values in the vicinity of the light rail stations will likely rise in anticipation of or as a result of new development. This will make it challenging to provide and maintain affordable housing in proximity to the stations.
- SeaTac is now a "minority majority" city, meaning that more than half of the population is made up of racial and ethnic minorities, many of whom are new immigrants with social service needs.
- Although SeaTac's housing sales and rent prices are among the most affordable in the region, households with very low incomes (less than 30% of the area median income) have difficulty finding housing.
- SeaTac residents, as well as residents of other south King County cities, are at a higher risk for chronic diseases, poor health, and lower life expectancies compared to the rest of the county.
- 58% of renters pay more than 30% of household income for housing; 35% of homeowners pay more than 30% of household income for housing (2010 Census).
- There are three mobile home parks with about 540 mobile homes in SeaTac. Mobile homes offer an affordable housing option preferred by some residents, but they are vulnerable to park closure by the property owner.

SeaTac's Demographics

SeaTac continues to become increasingly ethnically diverse. SeaTac's population is 61% persons of color, with 31% born in another country (King County analysis of 2010 US Census/2005-2009 American Community Survey data). More than 70 languages are spoken in SeaTac's schools. Poverty rates are also higher in SeaTac than in King County as a whole, with the median household income 9% less than the countywide median. Offering services that are geared to meet the needs of this diverse population and to create opportunity for people of all ages, abilities, and backgrounds is important.

GOALS AND POLICIES



This section contains SeaTac's housing and human services goals and policies. Goals represent the City's general objectives, while policies detail the steps required to achieve each goal's intent.

Access to Human Services

GOAL 3.1

Maintain and enhance the quality of life for all community members by providing and supporting effective and accessible human services that are culturally relevant, physically accessible, near adequate public transportation, affordable, and immediate.

Policy 3.1A

Provide human services to SeaTac residents regardless of race, ethnicity, cultural or religious background, national origin, sex, age, family status, sexual orientation, or sensory, mental, or physical disability.

Policy 3.1B

Provide a continuum of human services that empower, build upon the strengths, and increase the self-reliance of individuals and families.

Policy 3.1C

Actively inform residents of and increase access to available services.

Policy 3.1D

Evaluate and mitigate as necessary, impacts of city actions to human services programs, when developing policies, programs, and practices.

A "continuum" of human services refers to programs that address prevention and root causes of problems as well as symptoms.

Lack of information about existing services prevents individuals and families from finding and using the services they need. The City is in a unique position to publicize services through direct public education and referrals by the Human Services Office, Municipal Court, City police, fire department personnel, recreation supervisors, and other City staff.

GOAL 3.2

Effectively allocate City general funds for services that address the full spectrum of community needs and values.

Policy 3.2A

Fund local and regional human services that address priority needs and meet City human services funding criteria.

Policy 3.2B

Fund services that are high quality and fiscally sound with a track record of achieving measurable outcomes and results.

Policy 3.2C

Leverage financial, volunteer, and other resources for the greatest impact.

GOAL 3.3

Partner with funders, governments, educators, human service providers, media, police, the criminal justice system, and the community at large to meet human needs in a humane and holistic manner.

Policy 3.3A

Continually engage residents, service providers and community organizations in dialogue regarding the present service systems, the emerging needs of the community, and the building of a complete system of services.

Policy 3.3B

Cooperate with other local and regional funders to monitor and respond to changing community needs.

Policy 3.3C

Encourage local and regional coordination pursuing cooperative planning efforts with other governmental jurisdictions.

Policy 3.3D

Advocate for national, state, county, and local human services efforts that further the City's human services goals.

Policy 3.3E

Assist community organizations in their human services planning and provision.

City government expresses a community's values. To implement Framework Policy 1.1A (promote meaningful community engagement) and determine human services needs and priorities, the City should provide ample opportunity for public input through its Human Services Advisory Committee and other forums such as needs assessments, neighborhood events, surveys, and public meetings.



See Land Use policies 2.1B and 2.1E.



See Capital Facilities Goal 5.1 and 5.3 regarding capacity and concurrency.



See Utilities Goal 6.1 regarding adequate utilities provision.

Unlike most suburban cities, SeaTac has more jobs than residents. Focusing residential growth in SeaTac's transit communities improves the regional jobs-housing balance, supports the Regional Growth Strategy, and increases access to economic, education, recreational, and health opportunities for transit users.



See the Land Use Element's Healthy, Equitable, and Connected Communities section for policies that support physical and social stability.



See the Land Use Element's airport noise contours Map 2.3.

Variety of Housing Types

GOAL 3.4

Increase housing options in ways that complement and enhance nearby residential and commercial uses.

Policy 3.4A

Encourage development of residential areas and lots with adequate existing utilities and transportation systems.

SeaTac's neighborhoods have opportunities for infill development. Development of these lots is fiscally responsible and efficient since the utilities and infrastructure are already in place and available.

Policy 3.4B

Promote a variety of housing types and options in all neighborhoods, particularly in proximity to transit, employment, and educational opportunities.

Neighborhood Preservation

GOAL 3.5

Strengthen SeaTac's existing residential neighborhoods and foster a high degree of pride in residency or ownership.

Policy 3.5A

Use City programs to support physical and social stability in established residential neighborhoods.

SeaTac's neighborhoods are affected by many City codes, policies, and programs which regulate land use, physical improvements, and transportation. The City, by equitably maintaining and enhancing the physical and social qualities of existing neighborhoods, ensures that these programs provide the greatest benefit to residents.

Policy 3.5B

Support programs that repair and maintain existing single family, multifamily, owner-occupied, and rental housing to preserve and enhance the housing stock and retain the availability of safe, sanitary, and affordable units.

Neglected housing units can negatively affect a neighborhood's property values and the health of residents.

Policy 3.5C

Advocate for programs that require the insulation of housing units affected by aircraft noise through the Port of Seattle and Federal Aviation Administration Noise Remedy Program.

Housing Affordability

A basic tenet underlying housing affordability is that the private market generally creates housing for those in the upper income brackets, but City land use and planning policies and market interventions are necessary to make housing affordable to moderate and lower income residents.

The City recognizes that the following may affect housing affordability:

- Household income;
- Sufficiency of supply vs. demand;
- Cost of land, taxes, fees, and infrastructure;
- Lending policies and requirements;
- Vacancy rates;
- Clear, concise, and predictable development regulations; and
- Timely and efficient permit processing.

When evaluating affordable housing policies, the City should consider the following:

- Access to transit;
- Access to public services such as libraries, community centers, and schools;
- Community demographics including traditionally underserved communities;
- The existing level of affordable housing in SeaTac; and
- The number of households paying more than 30% of their income for housing.

SeaTac serves the region with its affordable housing stock. Its preservation is an important goal for the City and Puget Sound Region.



See the Land Use Element's Healthy, Equitable, and Connected Communities for transit communities policies and Map 2.1 for station areas.

GOAL 3.6

Increase housing opportunities for all economic segments of the community, especially in SeaTac's transit communities.

Policy 3.6A

Identify, maintain, and enhance the existing affordable housing stock in SeaTac.

Policy 3.6B

Use City land use and construction-related codes to encourage development and adequate supply of affordable housing for all economic segments of the forecast population.

Periodically, SeaTac should review its incentive programs to ensure their utility as trends and market conditions change.

Transit communities are generally considered the land within a half mile walking distance from the three light rail stations serving SeaTac. In some cases this land may extend beyond the Subarea boundaries. Developing transit communities implements the Council-endorsed Growing Transit Communities Compact.

SeaTac's Transit Communities are the areas within a half mile of the light rail stations. It is the City's policy to focus population and employment growth in these areas.

Policy 3.6C

Offer incentive programs for developers to preserve, replace, or build additional affordable housing units.

Policy 3.6D

Cooperate with the private sector, non-profit agencies, and public entities in the planning and development of affordable housing in SeaTac.

Policy 3.6E

In transit communities, ensure no net loss of affordable housing units.

Policy 3.6F

Work with regional and local governments to establish a transit-oriented development (TOD) property acquisition fund to encourage development of affordable housing in transit communities.

Land prices increase quickly near transit stations. This challenges equitable development by making site acquisition too expensive for affordable housing developers. A regional TOD fund would provide a tool to help develop affordable housing in transit communities.

Policy 3.6G

Continually review City codes and development regulations to ensure they do not create barriers to affordable housing opportunities.

Development regulations contribute to housing costs. The City can eliminate requirements that create unreasonable costs without benefit. In addition, the City may be able to streamline the development process and make it more predictable for the housing developer.

Policy 3.6H

Encourage equitable dispersal of affordable housing throughout the City.

Innovative tools, such as a percentage of affordable units in market-rate developments, accessory housing units, and first-time home buyer programs, can help distribute affordable housing opportunities throughout the community.

Policy 3.6I

Expand the Multifamily Tax Credit program to SeaTac's Transit Communities.

The Multifamily Tax Credit currently only applies to the S. 154th Street station area and the area around the SeaTac/Airport Station.

Policy 3.6J

Support and encourage legislation at the County, State, and federal level, as well as the regional pooling of resources, to promote SeaTac's affordable housing goals.

Special Needs Housing

GOAL 3.7

Encourage a variety of housing opportunities for persons with special needs.

Policy 3.7A

Support and plan for assisted housing opportunities using available federal, State, and County resources.

Policy 3.7B

Encourage the equitable distribution of special needs housing throughout the City.

Mobile Home Park Maintenance

SeaTac's mobile home parks provide an important affordable and community-oriented living option. However, mobile home park residents face unique challenges; they generally own their unit but do not own the underlying land. If the park owner closes the park, residents must sell their unit and find other housing or relocate their unit to another mobile home park. Depending on the age of the home, this can be difficult. Both options involve significant costs to the residents.

GOAL 3.8

Support the maintenance of SeaTac's existing mobile home parks as a source of affordable housing.

Policy 3.8A

Encourage cooperation between the State, County, City, and other groups concerned with mobile home issues to increase opportunities for tenant ownership of mobile home parks.

Policy 3.8B

Encourage essential safety upgrades for older mobile homes.

Policy 3.8C

Where owners meet low income guidelines, utilize City resources to upgrade existing mobile homes to meet minimum building standards.

Minimum standards are important for the safety of residents and stability of the park neighborhood. While the Zoning Code contains standards for the establishment of new mobile home parks, existing mobile home parks were permitted under King County and are subject to the regulations in place at that time. Enforcement of these standards is difficult because they are inconsistent with current standards.

"Special needs" refers to considerations or assistance required for people with mental, physical, or medical disabilities. For example, housing for people with limited mobility should follow universal design principles for maximum usability.

RCW 36.70A.410 requires that residential structures occupied by persons with disabilities or handicaps be treated no differently than a similar residential structure occupied by a family or other unrelated individuals.

Mobile Home Relocation

While the City of SeaTac cannot prohibit mobile home park closures, nor directly provide relocation assistance, the City can work with other regional jurisdictions to explore options for mobile home park tenants who may be impacted in the future. RCW 59.21.021 provides for financial assistance to displaced residents in some cases.

GOAL 3.9

Minimize the impacts of mobile home relocation on low and moderate income residents.

Policy 3.9A

Assist with identifying relocation options for mobile home park tenants forced to move due to mobile home park closure.

Policy 3.9B

Ensure that sufficient relocation plans are in place prior to the closure of any mobile home park.



RECOMMENDED IMPLEMENTATION STRATEGIES

This section identifies the specific steps, or implementation strategies, that achieve this Element’s policies. It also identifies the group(s) with primary responsibility for carrying out each strategy and the expected time frame within which the strategy should be addressed. Policy summaries are included in the table for reference.

As the Primary Responsibility column indicates, many of the implementation strategies will be initially undertaken by a specified board or commission. In most cases, the City Council will analyze the specific board/commission recommendation and make the final decision about how to proceed.

The time frame categories are defined as follows:

- Short-Term one to five years
- Medium-Term six to 10 years
- Long-Term 11 to 20 years
- Ongoing the strategy will be implemented on a continual basis

The time frames are target dates set regularly when the City Council adopts amendments to the Comprehensive Plan. Strategies that have been implemented are noted in brackets, along with the relevant completion date.

The list of proposed implementation strategies is a minimum set of action steps and is not intended to limit the City from undertaking other strategies not included in this list.

PROPOSED POLICIES	IMPLEMENTATION STRATEGIES	PRIMARY RESPONSIBILITY	TIME LINE
GOALS 3.1, 3.2, AND 3.3 ADDRESS THE PROVISION OF HUMAN SERVICES The Human Services section's policies focus on providing human services to populations in need. The community's most pressing human service needs are addressed through grants from the City of SeaTac to human service provider agencies. As part of this annual process, the policies are reviewed to reflect how the City wishes to implement its human services program. Therefore, no specific implementation strategies are included here.			
3.4 INCREASE HOUSING VARIETY			
3.4A Encourage development in residential areas with adequate public services.	Consider reducing the minimum single family lot size with appropriate adjustments in the Fire Code and building safety requirements.	Planning Commission, City Council	Short-Term
	Facilitate investment in existing neighborhoods with vacant or under-utilized land through infill development incentives. Techniques to be considered include: <ul style="list-style-type: none"> • Streamlining administrative procedures for small or irregular sites. • Pre-approving sites meeting certain conditions. • Revising existing site design standards. • Providing technical assistance with short platting. • Reducing subdivision/site development standards such as road width and parking requirements [see also strategy 3.6B]. 	Staff, Planning Commission, City Council	Short-Term
	Review City's Building Code to remove unnecessary obstacles, if any, to building infill single and multifamily housing.	Staff, Planning Commission, City Council	Short-Term

PROPOSED POLICIES	IMPLEMENTATION STRATEGIES	PRIMARY RESPONSIBILITY	TIME LINE
3.4B Promote a variety of housing types.	Develop incentives to include larger (3-4 bedroom) units in new apartment developments.	Staff, Planning Commission, City Council	Short-Term
	Develop incentives to promote the use of the High Density Single Family Special District Overlay in single family zones within ½ mile of a high capacity transit station.	Staff, Planning Commission, City Council	Short-Term
	Develop criteria for microhousing within close proximity to a high capacity transit station.	Staff Planning Commission	Short-Term
3.5 STRENGTHEN EXISTING NEIGHBORHOODS			
3.5A Support the physical and social stability of established residential neighborhoods.	Invest in older neighborhoods. Use local CIP funds, grants, and other funding sources to provide needed capital improvements, such as sidewalks, street trees, and pocket parks.	City Council	Ongoing
	Monitor eligibility of neighborhoods for CDBG and other neighborhood reinforcement money.	Human Services Advisory Committee Staff	Ongoing
	Support the formation and maintenance of community groups and neighborhood, apartment, and condo associations.	Staff	Ongoing
	Support development and maintenance of Block Watch activities.	City Council, Staff	Ongoing

PROPOSED POLICIES	IMPLEMENTATION STRATEGIES	PRIMARY RESPONSIBILITY	TIME LINE
3.5B Support programs that repair and maintain existing housing.	Continue to advocate for funding King County's Housing Rehabilitation Program; promote local use of weatherization program administered by King County Housing Authority.	Staff, City Council	Ongoing
	Periodically survey housing conditions and promote housing rehabilitation in targeted areas or across the City as needed.	Staff	Ongoing
	Sponsor an annual neighborhood beautification event in conjunction with neighborhood groups.	Staff, City Council	Ongoing
3.5C Advocate for programs that require insulation of housing impacted by aircraft noise.	Coordinate with Port of Seattle to assure that the most recent information on Port insulation programs is available for residents of houses in noise-impacted areas.	Staff	Ongoing
	Work with the Port to ensure the interest of SeaTac citizens are adequately represented in the aviation easement language.	Staff	Short-Term
3.6 INCREASE HOUSING OPPORTUNITIES FOR ALL			
3.6A Identify, maintain and enhance existing affordable housing stock.	Publicize King County housing rehabilitation program available to low and moderate income residents. (See strategy 3.5B.)	Staff, Human Services Advisory Committee	Ongoing
	In coordination with King County staff, monitor housing supply, affordability, and diversity, including progress toward meeting a significant share of the City's need for affordable housing for very low income households, and maintaining the City's share of housing for low and moderate income households. (See Countywide Planning Policy H-17.)	Staff	Ongoing

PROPOSED POLICIES	IMPLEMENTATION STRATEGIES	PRIMARY RESPONSIBILITY	TIME LINE
3.6A Continued	Review and amend, a minimum of every five years, the countywide and local housing policies and strategies, especially where monitoring indicates that adopted strategies are not resulting in adequate affordable housing to meet the jurisdiction's share of the countywide need. (See Countywide Planning Policy H-18.)	Staff, City Council, Human Services Advisory Committee	Ongoing
	Consider sponsoring a non-profit entity to acquire a residential structure in SeaTac and maintain it as affordable housing using Federal HOME funds.	Staff, Human Services Advisory Committee, City Council	Short-Term
	Consider funding a program that matches home owners who have extra space and/or maintenance or supplemental income needs with appropriate renters.	Staff, Human Services Advisory Committee, City Council	Short-Term
	Work with other agencies to prepare a brochure highlighting creative ways that home owners can reduce monthly housing costs and maintain their homes with low cost measures.	Staff	Short-Term
	Identify subsidized and low cost nonsubsidized housing that may be lost to redevelopment, deterioration, or public actions. <ul style="list-style-type: none"> Research sources of existing housing assistance or relocation funds available to low income residents and assist in obtaining these funds when subsidized and low cost nonsubsidized housing is lost due to redevelopment. 	Staff	Short-Term
	Continue to use existing Human Services funds to assist low income residents with maintenance and repair projects to maintain the City's existing stock of affordable housing.	Staff	Short-Term

PROPOSED POLICIES	IMPLEMENTATION STRATEGIES	PRIMARY RESPONSIBILITY	TIME LINE
3.6B Use land use policies and construction-related codes to encourage development and adequate supply of affordable housing.	Maintain density incentives for developers who make a proportion of their development affordable to lower income households.	Planning Commission, City Council	Ongoing
	Revise the Zoning Code to provide incentives for developing residential properties to the maximum densities allowed by the zone. Incentives may include: <ul style="list-style-type: none"> • Reduced infrastructure requirements • Building placement specifications to ensure further land division in the future 	Planning Commission, City Council	Short-Term
	Work with the Fire Department to streamline site and subdivision standards, allowing, for example, narrower roads and turn-arounds, and reduced parking requirements, to facilitate more efficient land usage and reduce land and building development costs, keeping in mind the need to maintain minimum life safety standards.	Planning Commission, City Council	Short-Term
	Update and streamline the PUD code.	Planning Commission, City Council	Short-Term
	Consider exemptions from part or all impact fees for housing projects that provide a minimum percentage of affordable units.	Planning Commission, City Council	Short-Term
	Streamline the SEPA process for projects that include affordable housing, based upon consistency with adopted City policy and the City's programmatic EIS.	Staff	Short-Term
3.6C Offer incentive programs for developers to preserve, replace, or build affordable housing.	(See Policy 3.6I)	Planning Commission, City Council	Short-Term
	Implement other incentives such as: <ul style="list-style-type: none"> • Reduced parking and/or landscaping requirements • Expedited permitting 	Staff	

PROPOSED POLICIES	IMPLEMENTATION STRATEGIES	PRIMARY RESPONSIBILITY	TIME LINE
3.6D Cooperate with public/private/non-profit agencies in the development of affordable housing in SeaTac.	Meet with existing non-profit housing developers to discuss the feasibility of non-profit housing development in SeaTac. Encourage its development by explaining SeaTac's procedures and working with them to find appropriate sites.	Staff	Short-Term
	Work with the Committee to End Homelessness and King County to assess the extent of homelessness in SeaTac; and advise on strategies to address the needs of homeless populations.	Staff	Ongoing
3.6E In transit communities, ensure no net loss of affordable housing units.	Explore Options to require at least one for one replacement of affordable housing units and encourage relocation assistance programs.	Planning Commission, Staff	Short-Term
3.6F Work with regional and local governments to establish a transit-oriented development (TOD) property acquisition fund to encourage development of affordable housing in transit communities.	Explore options for contributing local funds as a portion of regional public sector investment in a TOD property acquisition fund.	City Council, Staff	Short-Term
3.6G Ensure that City codes and development regulations do not create barriers to affordable housing.	Conduct a thorough review of all relevant City codes and regulations and revise where they are found to create unnecessary barriers.	Planning Commission, City Council	Short-Term
3.6H Encourage equitable dispersal of affordable housing throughout the City.	Inventory affordable housing locations.	Staff, Planning Commission, City Council	Short-Term
	Set affordable housing goals for each geographic area.	Staff, Planning Commission, City Council	Short-Term

PROPOSED POLICIES	IMPLEMENTATION STRATEGIES	PRIMARY RESPONSIBILITY	TIME LINE
3.6H Continued	Implement strategy appropriate to each area, such as: <ul style="list-style-type: none"> • Requiring affordable units in market rate development. • Allowing accessory housing units. • Supporting first time home buyer programs. 	Planning Commission, City Council	Short-Term
	Develop policies and employ best practices, where appropriate, related to the acquisition and disposition of properties that support affordable housing on surplus sites.	Planning Commission, City Council	Short-Term
3.6I Expand the multifamily tax credit program to transit communities.	Prioritize areas for program expansion.	Planning Commission, City Council	Short-Term
3.6J Support and encourage legislation at the County, State, and federal level, as well as the regional pooling of resources, that promote SeaTac's affordable housing goals.	Work with other local and regional governments, agencies, and non-profit housing developers to consolidate support for appropriate legislative or resource allocation actions.	City Council, Staff	Ongoing
3.7 ENCOURAGE A VARIETY OF HOUSING OPPORTUNITIES FOR SPECIAL NEEDS POPULATIONS			
3.7A Support and plan for assisted housing opportunities using federal, State, and County resources.	Determine numbers and needs of Special Needs Populations (such as people with physical and developmental disabilities, frail elderly, and people living with AIDS).	Staff, Human Services Advisory Committee	Short-Term
	Assess regional, State, and federal resources for meeting existing and future needs.	Staff, Human Services Advisory Committee, City Council	Short-Term

PROPOSED POLICIES	IMPLEMENTATION STRATEGIES	PRIMARY RESPONSIBILITY	TIME LINE
3.7B Encourage equitable distribution of special needs housing.	Identify areas where there are insufficient services directed to the needs of Special Populations.	Staff, Human Services Advisory Committee, City Council	Short-Term
	Assess ways the City can support programs that address these needs (marketing/referral or possibly direct funding).	Staff, Human Services Advisory Committee, City Council	Short-Term
	Ensure that residential zoning codes conform to state and federal requirements that residential structures occupied by persons with disabilities or handicaps be treated no differently than similar residential structures occupied by families or other unrelated individuals. (See RCW 36.70A.410)	Planning Commission, Human Services Advisory Committee, City Council	Ongoing
3.8 MAINTAIN MOBILE HOME PARKS			
3.8A Increase opportunities for tenant ownership of mobile home parks through cooperation with the State, County, and other groups.	Coordinate with other groups concerned with mobile home issues (e.g., mobile home park associations and the South King County Housing Forum) to increase opportunities for tenant ownership.	Staff	Ongoing
3.8B Encourage essential safety upgrades to older mobile homes.	Work to obtain CDBG funds to assist with essential safety upgrades to older mobile homes that are not up to code.	Human Services Advisory Committee, City Staff	Short-Term
	Continue to Include mobile homes in the City's Minor Home Repair program.	Staff	Ongoing
3.8C Encourage existing mobile home parks to meet minimum standards.	Adopt minimum standards for existing mobile home parks in the Zoning Code (e.g., internal streets, street lights, etc.).	City Council, Planning Commission	Short-Term
	Include mobile home parks in neighborhood planning efforts.	Planning Commission	Ongoing

PROPOSED POLICIES	IMPLEMENTATION STRATEGIES	PRIMARY RESPONSIBILITY	TIME LINE
3.9 MINIMIZE IMPACTS OF MOBILE HOME RELOCATION			
3.9A Work on creating location options for mobile home park tenants forced to move due to mobile home park closure.	Work with King County to find alternative sites for tenants forced to move.	Staff	Short-Term
3.9B Ensure that sufficient relocation plans are in place prior to the closure of a mobile home park.	To the extent permitted by law, maintain the Zoning Code provision that clearly notes the requirement that a tenant relocation plan be in place for any mobile home park proposing to close.	Planning Commission, City Council	Ongoing
	To the extent permitted by law, maintain specific requirements for tenant relocation plans. Inventory tenants and include specific mobile home relocation or other housing options for each tenant in relocation plans.	Planning Commission, City Council	Ongoing