



EXPANDED HOUSING CHECKLIST

Periodic Update Checklist for Fully-Planning Cities and Counties¹ with additional checklist items for housing element review.

This checklist provides the framework Commerce regional planners will use to review periodic update submissions. **This checklist is NOT required to be completed by each jurisdiction;** it is an additional tool to help local planners meet the intent of the statute.

- Jurisdictions may submit draft housing elements to [Laura Hodgson](#) for initial review prior to 60-day review. Jurisdictions in the PSRC region are encouraged to submit draft housing elements to Commerce when it is submitted to PSRC and/or King County, as the requirements from the state are slightly different from the local or regional requirements.
- **Housing element submissions should include a land capacity analysis (LCA) reflecting updated policies.** This LCA may be included as a supporting document such as a Housing Needs Assessment (HNA) or simply a separate land capacity analysis document. If the LCA is missing from the submission, it will be requested by Commerce staff.
- Regional planners will review draft comprehensive plans and development regulations for the items **IN BOLD CAPITALIZED TEXT BELOW EACH ITEM**. If these materials are not included in the housing submission, Commerce staff will request them. More information on these requirements are included in parenthesis if additional information is needed. (Land use element review items are included for reference to ensure consistency between elements.)
- Commerce will also be tracking that zoning changes are consistent with comprehensive plan changes and the LCA ([RCW 36.70A.115](#)). These zoning changes implement the policies in the comprehensive plan to plan for and accommodate housing affordable to all income brackets.
- **Questions?** Contact Laura Hodgson at Laura.Hodgson@commerce.wa.gov or 360-764-3143.

¹ The checklist items in this document are applicable to cities and counties, unless otherwise noted, but the headings in the checklist may be slightly different from the county checklist.

Section I: Comprehensive Plan Elements

Land Use Element

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

	Consistent? Yes/No	Changes needed?
<p>b. A future land use map showing land uses, 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>THE LAND USES MUST REFLECT PROJECTED GROWTH INCLUDING FUTURE HOUSING NEEDS.</p>	No	<p>Yes</p> <p>Update of Land Use Element after Land Capacity Analysis is completed by TRPC</p>
<p>d. A consistent population projection throughout the plan which should be consistent with the jurisdiction's allocation of projected countywide population and housing needs. RCW 36.70A.115, RCW 43.62.035 and WAC 365-196-405(f)</p> <p>TABLE OR OTHER DOCUMENTATION OF LOCAL ALLOCATION OF POPULATION AND HOUSING NEEDS BY INCOME BRACKET FROM THE COUNTYWIDE PROCESS.</p>	No	<p>Yes. Update using TRPC population forecast.</p> <p>Page 9 – Update Housing Trends and projections</p> <p>Page 38 – Update format of Population as table. Currently it's a written paragraph.</p> <p>Page 40 – Need to show housing by income and AMI.</p>
<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> <p>ESTIMATES SHOULD INCLUDE ASSUMED DENSITIES TO ACCOMMODATE HOUSING NEEDS. (See WAC 365-196-210(6), and Housing Element Book 2: Step C and footnote 30 on page 24.)</p>	No	<p>Yes.</p> <p>Update City-Wide Land Use Map and Chapter 2 of Land Use Element.</p>

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**.

	Consistent? Yes/No	Changes needed?
<p>a. Goals, policies and objectives for:</p> <ul style="list-style-type: none"> the preservation, improvement and development of housing, RCW 36.70A.070(2)(b), and moderate density housing options including, but not limited to, duplexes, triplexes, and townhomes, within an urban growth area boundary. RCW 36.70A.070(2)(b) amended in 2021, and WAC 365-196-410(2)(a) <p>ENSURE THERE ARE POLICY(IES) ON A VARIETY OF MODERATE DENSITY HOUSING TYPES, SUCH AS DUPLEXES, TRIPLEXES, AND TOWNHOMES IN URBAN GROWTH AREAS.</p>	<p>Yes.</p> <p>H-1, H-2 (2.1)</p>	<p>May want to consider stronger language supporting middle housing.</p> <p>NEW:</p> <ul style="list-style-type: none"> H-1, H-2, H-3 H-1
<p>b. Consideration of housing locations in relation to employment locations. RCW 36.70A.070(2)(d) amended in 2021.</p> <p>LAND USE MAP SHOULD SHOW HIGHER DENSITY HOUSING LOCATED NEAR EMPLOYMENT (COMMERCIAL) AND/OR ADJACENT TO HIGH QUALITY TRANSIT IF APPLICABLE. (Housing Element Book 2: see pages 67-68.)</p>	<p>Yes.</p> <p>H-6</p>	<p>May want to evaluate policy language with update to the Economic Development Plan.</p> <p>NEW: H-4.</p>
<p>c. Consideration of the role of accessory dwelling units (ADUs) in meeting housing needs. RCW 36.70A.070(2)(d) amended in 2021.</p> <p>TO SHOW CONSIDERATION OF ADUS, DO ONE OR BOTH OF THE FOLLOWING:</p> <p>(1) THE HOUSING NEEDS ASSESSMENT OR HOUSING ELEMENT MUST INCLUDE TEXT AND/OR POLICIES THAT ADDRESSES THE POTENTIAL FOR ADUS TO MEET HOUSING NEEDS, OR</p> <p>(2) INCLUDE ADU CAPACITY IN LAND CAPACITY ANALYSIS. 20-year ADU capacity should not exceed 10% of eligible lots.</p> <p>(See Housing Element Book 2 - ADU narrative guidance: pages 68-69; ADU capacity: see Step 1.6 on pages 27-28.)</p>	<p>No.</p>	<p>Yes.</p> <p>Some policy support (H2.1, H-11.3), but could be expanded to specifically address ADUS as potential to meet housing needs.</p> <p>New: H-1.2</p>

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Updating GMA Housing Elements and Planning for Housing.

	Consistent? Yes/No	Changes needed?
<p>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 countywide housing need, as provided by Commerce. RCW 36.70A.070(2)(a) amended in 2021, WAC 365-196-410(2)(b) and (c)</p> <p>TABLE OR OTHER DOCUMENTATION OF LOCAL ALLOCATION OF HOUSING NEEDS BY INCOME BRACKET. (Housing Element Book 1: see #6 of "Minimum standards for identifying and allocating projected housing needs" on page 60.)</p>	No	<p>Yes.</p> <p>New State requirements. Table will need to be added.</p> <p>H-1.2.2</p>
<p>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)</p> <p>STATEMENT SHOWING THERE IS SUFFICIENT CAPACITY OF LAND FOR ALL INCOME HOUSING NEEDS, INCLUDING A TABLE SHOWING THE BREAKDOWN OF CAPACITY IN ZONES WHICH ADDS UP TO HOUSING NEEDS FOR ALL INCOME BRACKETS. (Supporting documentation of land capacity analysis is encouraged.) (Housing Element Book 2: see bottom table of Exhibit 17 on page 40 and Exhibit 20 on page 48.)</p> <p>ANY LIMITATIONS ON SUPPORTIVE HOUSING TYPES (EMERGENCY HOUSING (EH), EMERGENCY SHELTER (ES), PERMANENT SUPPORTIVE HOUSING (PSH), AND TRANSITIONAL HOUSING (TH)) MUST ALLOW THE SITING OF A SUFFICIENT NUMBER OF UNITS AND BEDS NECESSARY TO MEET PROJECTED NEEDS. (Housing Element Book 2: see pages 41-48.)</p> <p>THE ZONING MAP MUST BE CONSISTENT WITH AND IMPLEMENT THE LAND USE MAP AND LAND CAPACITY FINDINGS. (See RCW 36.70A.115(1), WAC 365-196-800)</p>	No.	<p>Yes.</p> <p>New State requirements</p> <p>Also, H-1.2.6, H-1.7</p>

	Consistent? Yes/No	Changes needed?
<p>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</p> <p>INCLUDE A LIST OF BARRIERS TO AFFORDABLE HOUSING NEEDS, INCLUDING BARRIERS TO EMERGENCY HOUSING AND PERMANENT SUPPORTIVE HOUSING. (Housing Element Book 2: see page 50 and Appendix B.)</p> <p>INCLUDE AN ACTION PLAN TO REMOVE BARRIERS TO AFFORDABLE HOUSING. (Housing Element Book 2: see page 61 and Appendix B.)</p> <p>Note: Identification of barriers to affordable housing and actions to remove barriers do not need to be in table format, but both items need to be present in the housing element.</p>	No.	<p>Yes.</p> <p>New State requirements</p> <p>H-1.1, H-1.2, H-1.3 H-4.6</p>
<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>RCW 36.70A.070(e) new in 2021</p> <p>INCLUDE A STATEMENT OF WHETHER DATA SHOWS IF THERE ARE DISPARATE IMPACTS. NOTE: COMMERCE HAS DATA AVAILABLE FOR ALL JURISDICTIONS ON OUR EZVIEW SITE. (Housing Element Book 3: see pages 19-20.)</p> <p>REVIEW OF HOUSING ELEMENT POLICIES AND REGULATIONS THAT HAVE LED TO THESE IMPACTS. This may be in the housing element, housing needs assessment or the staff report. (Housing Element Book 3: see pages 33-36; this specific evaluation framework is not required.)</p>	No.	<p>Yes.</p> <p>New State requirements</p> <p>H-1.1.1</p>

	Consistent? Yes/No	Changes needed?
<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. RCW 36.70A.070(2)(f) new in 2021</p> <p>INCLUDE POLICIES TO ADDRESS THESE IMPACTS, OR THAT ADDRESS DEVELOPMENT OF MORE AFFORDABLE HOUSING, PRESERVATION OF EXISTING AFFORDABLE HOUSING, AND PROTECTION OF EXISTING HOUSEHOLDS. (Policies: Housing Element Book 3, see pages 36-39 and Appendix C of Housing Element Book 2; Regulations: Housing Element Book 3, pages 43-44.)</p>	No.	<p>Yes.</p> <p>New State requirements H-1.1.1</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. RCW 36.70A.070(2)(g) new in 2021</p> <p>DISCUSSION AND/OR MAP OF AREAS THAT MAY BE AT RISK OF DISPLACEMENT. (COMMERCE AND PSRC HAVE MAPS AVAILABLE, AND INCLUSION OF ONE WOULD MEET THIS REQUIREMENT.) (Housing Element Book 3; see pages 27-31.)</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. RCW 36.70A.070(2)(h) new in 2021</p> <p>SEE H ABOVE.</p>	No.	<p>Yes.</p> <p>New State requirements.</p> <p>Working on Displacement Study with the Cities of Olympia and Lacey and Thurston County.</p>

Consistency is required by the GMA

	Consistent? Yes/No	Changes needed?
<p>b. All plan elements must be consistent with each other. RCW 36.70A.070 (preamble) and WAC 365-196-500</p> <p>ENSURE CAPITAL FACILITIES, TRANSPORTATION AND UTILITIES ELEMENTS INCLUDE IMPROVEMENTS TO SUPPORT ADDED HOUSING DENSITY AND CONSIDER UNDERSERVED AREAS. LIKELY CONSIDERATIONS WILL INCLUDE SYSTEM IMPROVEMENTS AND PRIORITIZING AND FUNDING THIS WORK. (Housing Element Book 2: see LCA Step 1.3 “Identify gaps in utility infrastructure and services” on page 22, and “Identify related infrastructure and service needs” on page 77.)</p>	No.	Yes.

Public Participation

<p>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.</p> <p>THE PUBLIC PARTICIPATION PLAN SHOULD SHOW EFFORTS TO ENGAGE VULNERABLE POPULATIONS, OVERBURDEDED COMMUNITIES, AND THOSE WHO MAY HAVE BEEN DISPARATELY IMPACTED BY HOUSING POLICIES. (Housing Element Book 3: see pages 15-19.)</p>	No.	<p>Yes.</p> <p>Community Engagement Plan will guide process and be revised throughout the process.</p>
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Section II: Development Regulations

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

Zoning Code

	Consistent? Yes/No	Changes needed?
<p>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)</p> <p>If subject to middle housing requirements in RCW 36.70A.635, see material on Commerce's Middle Housing webpage.</p> <p>ZONING MAP AND TEXT ALLOW FOR THE HOUSING TYPES AND DENSITIES IN THE LAND CAPACITY ANALYSIS.</p> <p>THESE ZONING CHANGES MUST BE COMPLETE BY THE END OF THE PERIODIC UPDATE PERIOD.</p>	No.	Yes.
<p>b. [FOR CITIES] 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)</p> <p>“permanent supportive housing” is defined in RCW 36.70A.030; “transitional housing” is defined in RCW 84.36.043(2)(c)</p> <p>[FOR CITIES AND COUNTIES] ANY LIMITATIONS ON PERMANENT SUPPORTIVE HOUSING AND TRANSITIONAL HOUSING MUST BE CONNECTED TO PUBLIC HEALTH AND SAFETY AND ALLOW THE SITING OF A SUFFICIENT NUMBER OF UNITS AND BEDS NECESSARY TO MEET PROJECTED NEEDS. (Housing Element Book 2: see pages 41-48.)</p>	Yes.	Addressed by Ordinance No. 02021-019, approved in 2022.
<p>c. [FOR CITIES] 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)</p> <p>“emergency housing” is defined in RCW 84.36.043(2)(b)</p> <p>[FOR CITIES AND COUNTIES] ANY LIMITATIONS ON EMERGENCY HOUSING AND EMERGENCY SHELTER MUST BE CONNECTED TO PUBLIC HEALTH AND SAFETY AND ALLOW THE SITING OF A SUFFICIENT NUMBER OF UNITS AND BEDS NECESSARY TO MEET PROJECTED NEEDS. (Housing Element Book 2: see pages 41-48.)</p>	Yes.	Addressed by Ordinance No. 02021-019, approved in 2022