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**

V3.2

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

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[1] https://lawfilesext.leg.wa.gov/biennium/2021-22/Pdf/Bills/Session Laws/House/1220-S2.SL.pdf?q=20211209114015
[2] https://deptofcommerce.box.com/s/mop7xrkzh170th1w51ezbag3pmne9adz

Items are from the Guidance for Updating Your Housing Element[3] (2021, Commerce).

For additional information on the GMA housing programs, please visit the [GMS Planning for Housing Webpage](#)[4] or contact Anne Fritzel, housing programs manager, at Anne.Fritzel@commerce.wa.gov.

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[3] https://deptofcommerce.app.box.com/s/ig3pd55wrngxacxjwnt6hv98ue8swaj6
[4] https://www.commerce.wa.gov/serving-communities/growth-management/growth-management-topics/planning-for-housing/

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Introduction

Washington state is facing a housing affordability crisis because housing production has not kept pace with population growth. The housing scarcity negatively impacts the economic, social and health wellbeing of all Washington households and communities. However, communities of color have been historically disadvantaged by housing policies and practices making them disproportionately harmed by housing scarcity. Today, communities of color experience higher rates of housing cost burden, substandard housing conditions and lower home ownership rates[5] 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;*

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[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" (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 statue are defined here, while the full list of definitions is included in the Definitions section at the end of this document.

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[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

Step 1 and throughout Engage the Community	Step 2 Gather and Analyze Data	Step 3 Evaluate Policies	Step 4 Revise Policies	Step 5 Review and Update Regulations

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.

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[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[9] and Eastern Washington University[10])
- History & Social Justice's national register of Sundown Towns[11]
- Civil Rights & Labor History Consortium[12] (University of Washington)
- History of redlining (Mapping Inequality: Redlining in New Deal America)[13]
- HistoryLink.org
- Local historical associations
- Local collections in public libraries
- Washington State Department of Archeology and Preservation WISSARD[14] directory of historical places
- Community elders or seniors[15]
- U.S. Census Quick Facts[16]
- Tribal communities
- Community groups
- Ethnic and cultural associations[17]
- Washington's Secretary of State Charitable Organizations Registry[18]
- PSRC Equitable Engagement for Comprehensive Plans (July 2022)[19]
- American Planning Association's Planning for Equity Policy Guide (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.

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[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	• 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	• 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	• Implement your engagement strategies • Update the summary of opportunities to contribute if it changes	• 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	• Identified communities of interest • Identified opportunities to build on existing relationships • Information on where people are and opportunities for engagement	• 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	• **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	• 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. Census[21] provides a compiled community profile with demographic information useful for identifying racial or ethnic groups in the community.

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[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 groups[22] 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.

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[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**
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> 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 groups[24]
- 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

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[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]

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[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 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
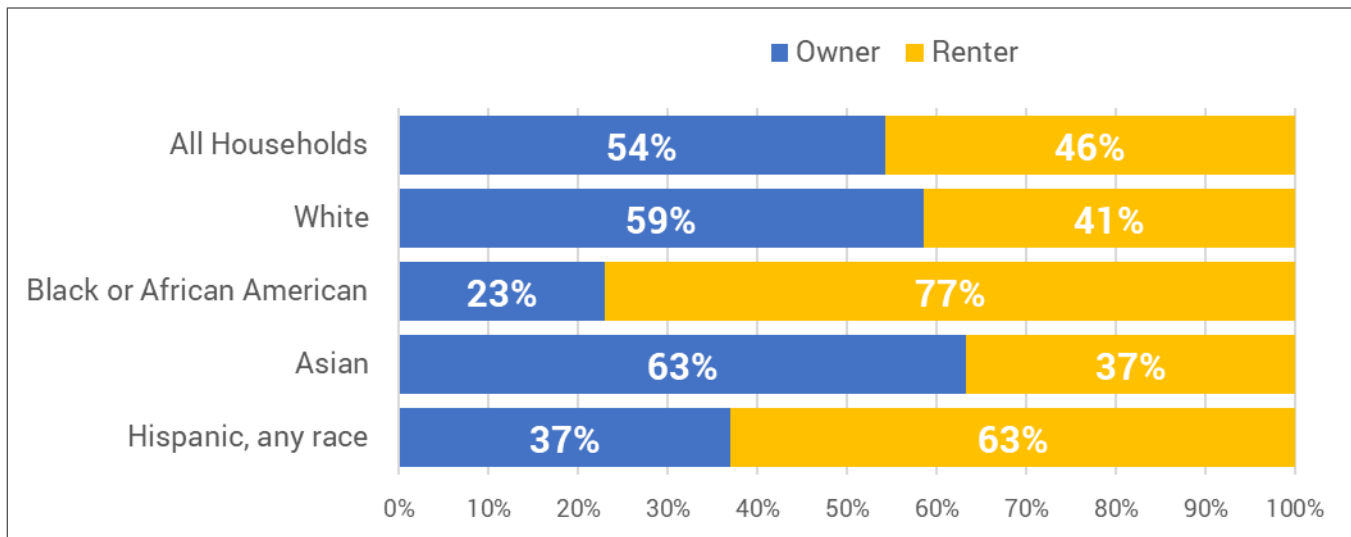
Note: White, Asian and Black or African American households include both Hispanic and non-Hispanic ethnicity.

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

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[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 map[33] 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.

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[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
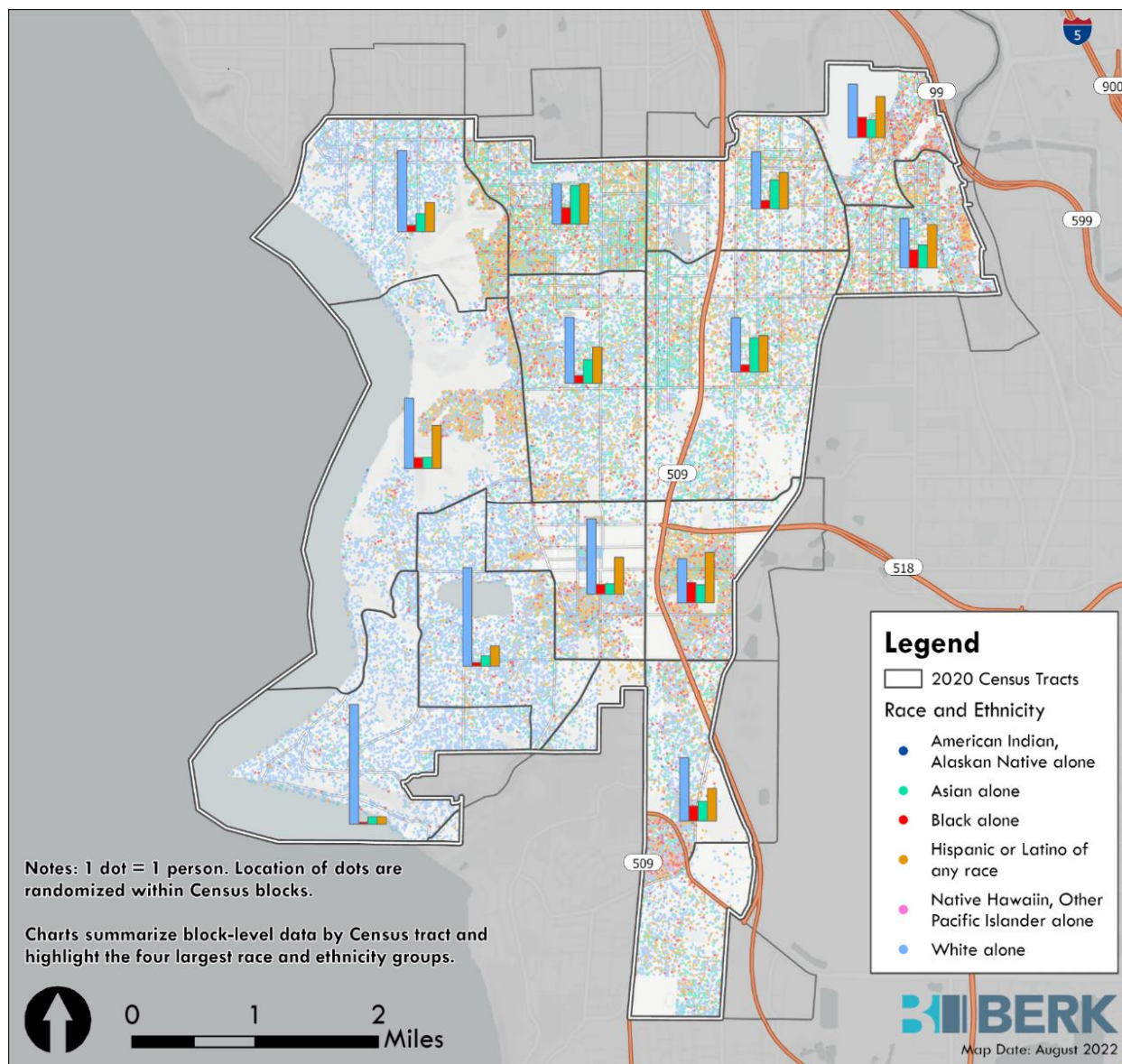
Sources: US Census, 2020; BERK, 2022

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.

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[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
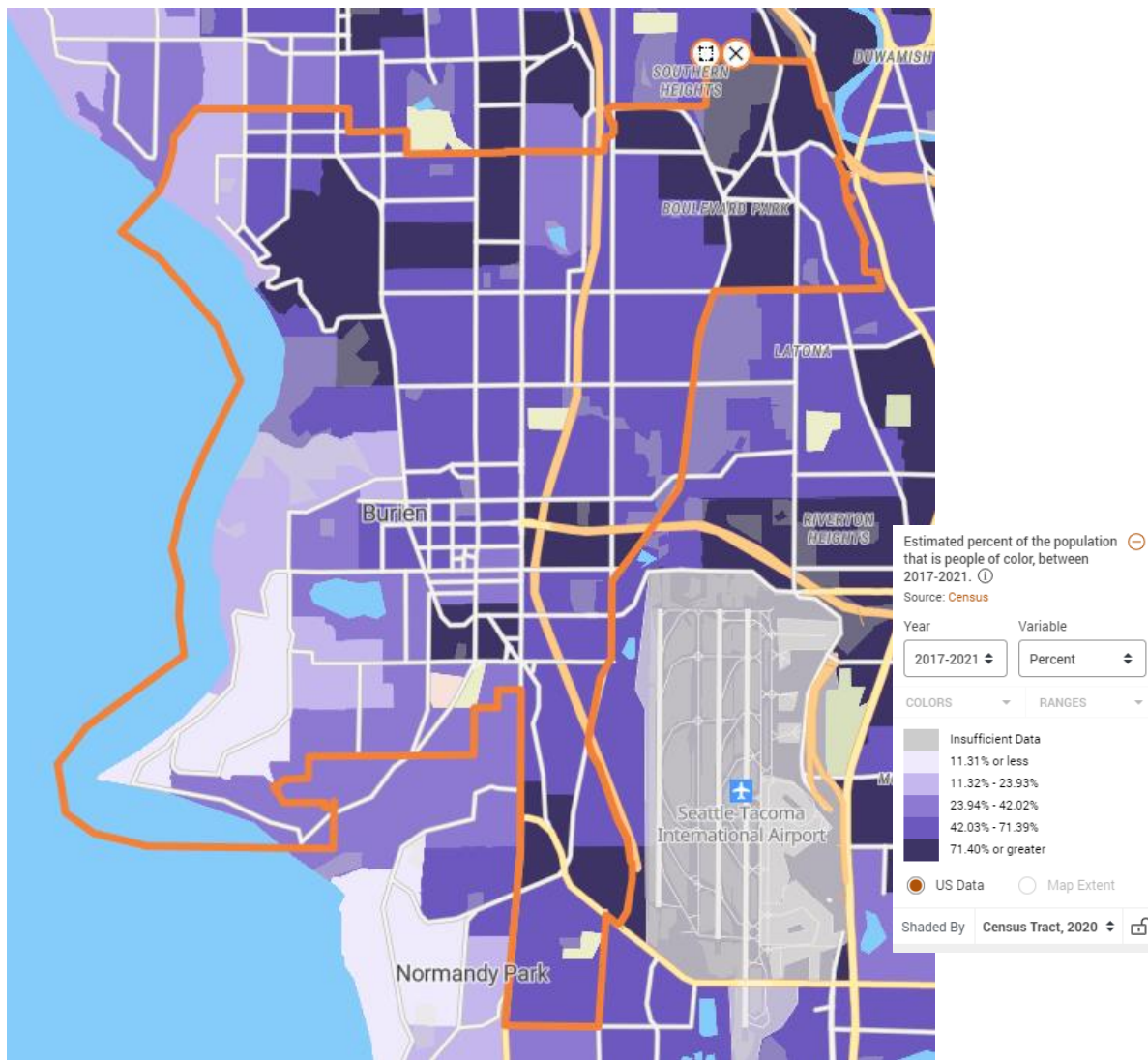
Sources: "Estimated percent of the population that is people of color, between 2017-2021." PolicyMap (based on data from Census: US Bureau of the Census, American Community Survey), 2023, www.policymap.com.

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.

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[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
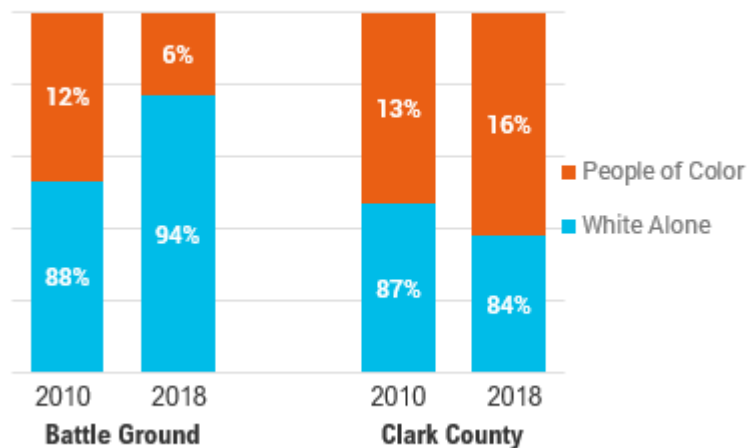
Sources: American Community Survey (Table DP05) 5-Yr Estimates, 2010 & 2018; BERK 2022

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 survey[37] 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,

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[37] https://clark.wa.gov/sites/default/files/dept/files/community-services/CDBG/FullAIReport.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]

PSRC Displacement Risk Map

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

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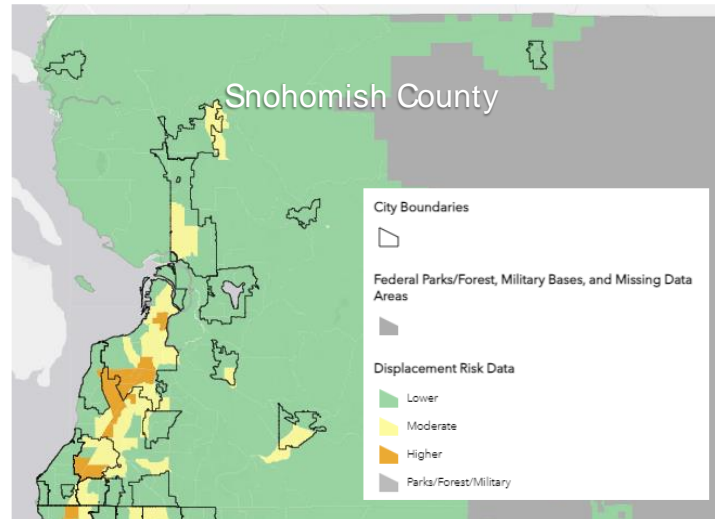
[38] A draft version of this statewide displacement risk map should be available by the summer of 2023.
[39] See The Color of Law: A Forgotten History of How our Government Segregated America by Richard Rothstein for more on racial discrimination in housing.
[40] https://www.psrc.org/our-work/displacement-risk-mapping

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.

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[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.

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[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
Moderate	3-4 indicators
Low	<3 indicators

Census Tracts

City	Census Tract	Poverty Status: % Doing OK	% Rentals	Median Home Value	Median Gross Rent	% Without Degree	% POC	Total Indicators
Walla Walla	9204	100%	0%	NA	NA	97%	57%	2
	9205	46%	54%	$ 102,600	$ 851	87%	66%	6
	9206	54%	51%	$ 134,200	$ 891	84%	45%	6
	9207.01	67%	53%	$ 198,800	$ 878	67%	20%	3
	9207.02	68%	28%	$ 224,100	$ 1,023	56%	21%	0
	9208.01	48%	42%	$ 186,500	$ 1,000	76%	20%	4
	9208.02	49%	55%	$ 208,500	$ 831	65%	24%	4
Waitsburg	9201	80%	17%	$ 254,300	$ 870	70%	12%	2
College Place	9203	69%	41%	$ 190,000	$ 890	66%	25%	3
Dayton	9602	68%	31%	$ 170,800	$ 740	75%	14%	3

Source: Walla Walla Regional Housing Action Plan, FSC Group, 2021

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[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

<table>
<tr><td>📄</td><td>**Resources for Step 2: Gather and analyze data**</td></tr>
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- [U.S. Census Data](#)[47]
- American Community Survey[48]
- 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 moving[53]
- Commerce's [Manufactured/Mobile Home Relocation Assistance Program](#) provides data on existing and closed mobile home parks[54]

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.

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[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.

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[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 area 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.

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[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.	- 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.	- 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.	- 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.

- 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](#)[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.

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[59] https://deptofcommerce.box.com/shared/static/pophc16jetggsctctmnbjomm0qa7tpu8.pdf

<table>
<tr><td>📄</td><td>**Resources for Step 5: Reviewing and updating regulations and programs**</td></tr>
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- 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.

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[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. 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.	Generate revenue for affordable housing • 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 Increase affordable housing production • 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. Adopt incentives, strategies, actions and regulations that reduce barriers to and promote access to affordable homeownership.	• 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	Policies	Incentives, strategies, actions and regulations
Protect existing communities and households	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.	Homeownership programs • 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 Rental assistance Tenant protections • 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	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. Use measures to track implementation and performance to ensure policies are working as intended to address racially disparate outcomes, exclusion, displacement and displacement risk.	• 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

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[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.

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[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 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	**Goal H 1: To maintain and strengthen existing residential neighborhoods.** **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.**
Regulation	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. Single-family dwellings, manufactured homes and mobile homes shall require two (2) parking spaces in a minimum 20-ft.-by-20-ft. garage.

Question	Evaluation
What does the regulation intend to protect or prevent?	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. 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.
Who benefits from this regulation and how?	The regulation for providing **parking spaces on site** benefits vehicle traffic through residential areas. The regulation for providing **parking spaces on site** benefits neighbors who currently park on street in the public right of way. The regulation for providing **covered parking** benefits the neighbors who may not like looking at vehicles.
Who is burdened by this regulation and how?	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. 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.
Does the regulation contribute to identified racially disparate impacts, displacement, or exclusion in housing?	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. 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 disproportionally comprised of households of color.

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?	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**. 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.**
Does the regulation support the goals, objectives, and policies in our comprehensive plan?	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. 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.
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?

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[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"

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[69] This definition is based on the City of Seattle's definition for equitable development. See Equitable Development Initiative.avaialble 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 projections protections for people who pay rent for the place where they live. In Washington state, legal projections 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.

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[70] Definition adapted from the Urban Displacement Project. See https://www.urbandisplacement.org/about/what-are-gentrification-and-displacement/

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Appendix A. Zoning and Race

Zoning and race

A goal of the Growth Management Act is to "plan for and accommodate housing affordable to all economic segments of the population of the state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock" (RCW 36.70A.020(4)). Local governments are required to plan for housing that meets the needs of all residents by ensuring sufficient residential land capacity for housing (RCW 36.70A.070(2)(c) and RCW 36.70A.115).

Racism has shaped American history from the beginning, including the form and shape of our communities. European American settlement on Native American land, the Indian Removal Act (1830), slavery, post- Civil War Jim Crow laws, the Chinese Exclusion Act (1882), and Japanese internment during World War II are among the many notable events that have shaped how we live today. These and other events deprived groups of people from access and opportunity, leading to negative outcomes that were later used to justify further discriminatory policies and practices. Zoning and other land use practices that emerged in the 20th century furthered this pattern of discrimination and shape racially disparate impacts that are perpetuated today.

Local zoning originated in the early 1900s as a tool to address growth and industrialization (see the high-level Chronology of race in land use below). From its beginning, zoning laws have been used to segregate households by race and ethnicity. The American Planning Association explains that "zoning, which is intended to separate incompatible land uses, has also been used to exclude certain population groups from single-family neighborhoods and to exclude multifamily rental housing from neighborhoods with better access to jobs, transit, and amenities" (American Planning Association, 2019).

Zoning is not the only governmental program that has led to racially disparate impacts, displacement and exclusion in housing. Public policies forced the displacement of Black, Indigenous and people of color (BIPOC) households through urban renewal and midcentury interstate highway construction. Private practices such as racially restrictive covenants and steering have prevented BIPOC households from accessing housing in certain neighborhoods. Government-sanctioned financial practices such as redliningRedlining, the home mortgage interest tax deduction, predatory lending and the systemic undervaluing of real estate in BIPOC neighborhoods have contributed to the devaluation of BIPOC household property and wealth.[71]

Today, zoning laws—such as exclusively single-family zones, minimum lot sizes and separating multi-family development from single-family development—serve to exclude minorities and lower-income households from accessing large parts of our cities and protect and enhance the land value of white neighborhoods while undermining the value of land owned by people of color. Regardless of the intent of current land use policies, past and present land use regulations create the effect of racially disparate impacts. For example, the 2019 Washington state homeownership rate for BIPOC households is 49%, compared to 68% for non-Hispanic white households (Homeownership Disparities Work Group, 2022). Since a greater proportion of BIPOC households rent their housing, BIPOC households face greater housing insecurity and displacement risk.

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[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 covenants[72] 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).

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[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 ghettoes, and generally defeating the social purpose of urban renewal" (Cebul, 2020).

Because urban renewal policy was designed to target neighborhoods that experienced divestment, it disproportionately impacted BIPOC and low-income residents. Although the program was meant to compensate displaced people by providing financial assistance, aid in relocation or placement into public housing units, this compensation was often late or not provided at all. Because displacement records were poorly kept or did not exist, cities could avoid providing compensation, as they had no way to know who displaced residents were (Cebul, 2020).

Although urban renewal practices did make some improvements, these were typically to the benefit of developers or wealthier suburbanites. Concurrently, urban renewal contributed to disproportionate home ownership for white residents, as white residents were incentivized to become homeowners, while BIPOC residents were moved to public housing and the rental market (Schwab, 2018).

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Appendix B. Data Sources

Federal resources

Census Bureau

United States Decennial Census

The United States census provides a complete count of the entire U.S. population every ten years. It is the most reliable population data available for small areas because it surveys the entire population of persons living in housing structures. Census data is limited to age, race, number of people in the household and housing type.

The U.S. Census Bureau compiles summary statistics for states, counties, census-designated places and additional smaller geographies. Information on the data collection procedures, accessing data and interpreting estimates is available at www.census.gov.

American Community Survey (ACS)

The American Community Survey (ACS) is an ongoing nationwide survey conducted by the U.S. Census Bureau in addition to the census. It is designed to provide communities with current data about how they are changing. The ACS collects information such as age, race, income, commute time to work, home value, veteran status and other important data from U.S. households. ACS data is commonly used for the Community Profile section of a housing needs assessment.

Because they represent statistical estimates based on responses from a sample of the total population, all ACS data are provided with a margin of error.[73] Reviewing margins of error is important for interpreting estimates. The margin of error indicates the range of the possible true values based on a 90% confidence interval. The margin of error reflects the number of reported data (the sample size) and the variation of data. Generally, estimates for larger populations will have greater reliability and less margin of error. Reviewing margin of error is particularly important when comparing estimates between communities, populations or trends over time. If your comparison shows a difference that is smaller than the margin of error, you are not able to reliably conclude that there is a valid difference.

The U.S. Census Bureau releases two kinds of ACS data products: 5-year estimates and 1-year estimates. The estimates reflect different sampling strategies with implications to be considered when using these data in a needs assessment.

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[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.	• 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.	• 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[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 Statistics[75] that includes data on job locations and residential locations and the connections between the two. It also provides companion reports on age, earnings, industry distributions, race, ethnicity, educational attainment and sex. The data set is limited to jobs that are covered by unemployment insurance as well as federal employees. More information can be found at https://lehd.ces.census.gov/.

U.S. Department of Housing and Urban Development

Comprehensive Housing Affordability Strategy (CHAS)

Each year, the U.S. Department of Housing and Urban Development (HUD) receives custom tabulations of ACS data from the U.S. Census Bureau. These data, known as the "CHAS" data (Comprehensive Housing Affordability Strategy[76]), demonstrate the extent of housing problems and housing needs, particularly for low-income households. Local governments use CHAS data to plan how to spend HUD funds and may be used by HUD to distribute grant funds.

CHAS data groups households by income level relative to median family income (MFI). These data include adjustments to account for differences in household size to reflect the fact that the living expenses for a 1-person household are significantly less than those of a household of four. These adjustments are based on

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[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)

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[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]

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[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

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[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/.

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[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
- Homeownership - Housing cost burden - Overcrowding - Neighborhood access - Fair housing testing	- Disparities in environmental health hazards - Commute burden - Life expectancy - Educational access	- 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	- 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			
- 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
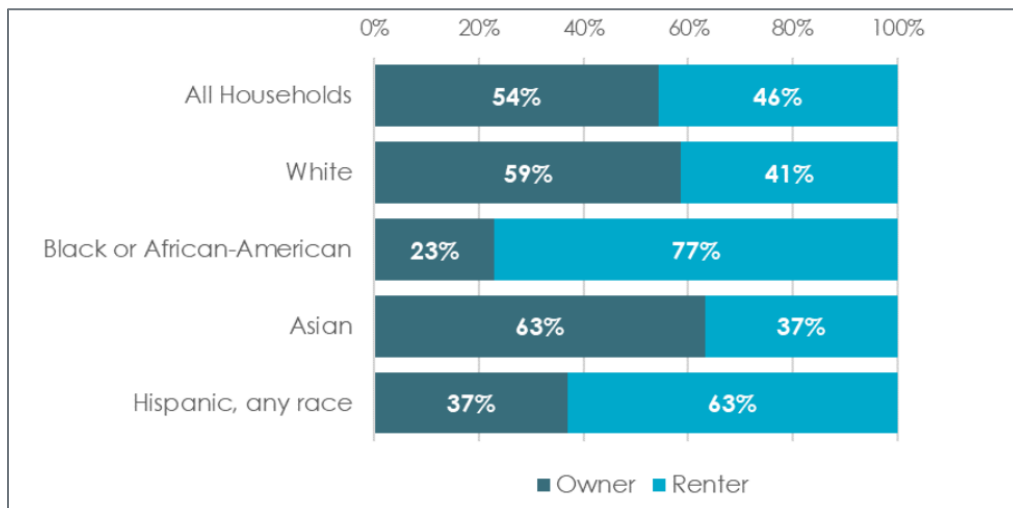
Note: White, Asian, and Black or African American households include both Hispanic and non-Hispanic ethnicity.
Sources: American Community Survey 5-year estimate (Table B25003), 2014-2018; BERK Consulting, 2020.

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)

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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 Tool[93] 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.

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[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" 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.
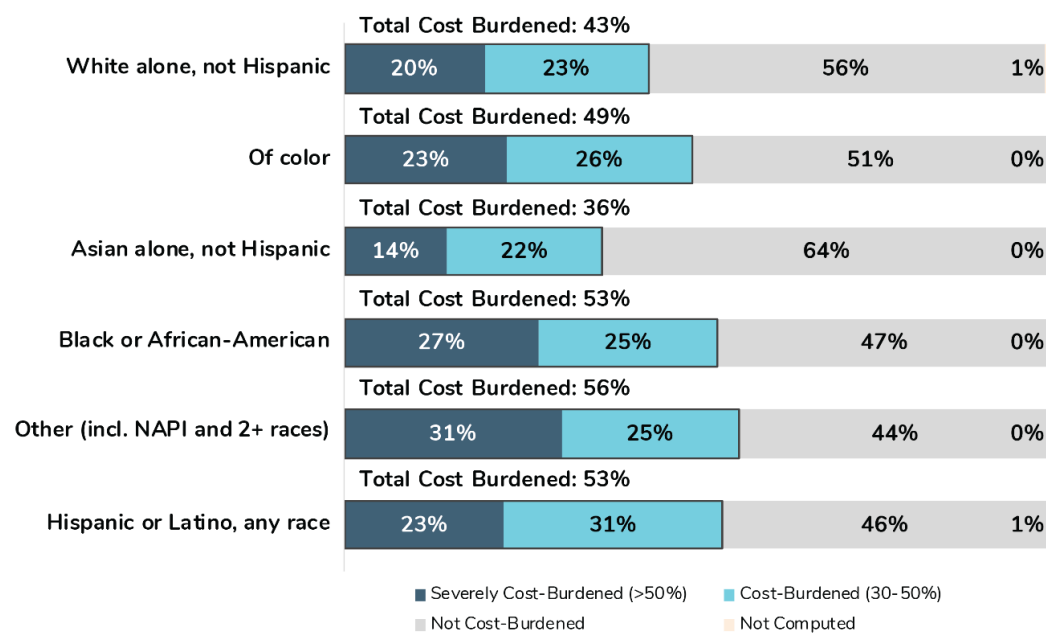
Exhibit 18. CHAS table structure for analyzing cost burden by racial group names for owner households, CHAS 2015 – 2019

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

	Total Cost Burdened	Severely Cost-Burdened (>50%)	Cost-Burdened (30-50%)	Not Cost-Burdened	Not Computed
White alone, not Hispanic	43%	20%	23%	56%	1%
Of color	49%	23%	26%	51%	0%
Asian alone, not Hispanic	36%	14%	22%	64%	0%
Black or African-American	53%	27%	25%	47%	0%
Other (incl. NAPI and 2+ races)	56%	31%	25%	44%	0%
Hispanic or Latino, any race	53%	23%	31%	46%	1%

■ Severely Cost-Burdened (>50%)　■ Cost-Burdened (30-50%)
■ Not Cost-Burdened　■ Not Computed

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[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

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[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

	1.00 or less occupants per room	1.01 or more occupants per room
Hispanic or Latino (any race)	53%	43%
White, Not Hispanic or Latino	97%	3%
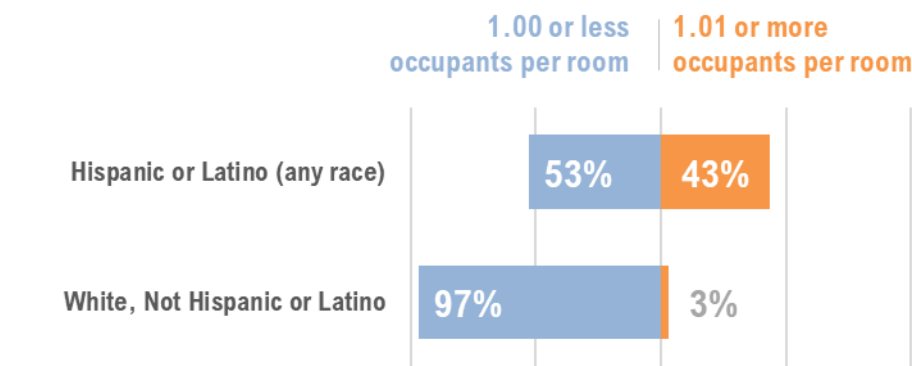
Source: ACS B250141H and B25014I, 2022

Data sources:
- ACS Table B25014H and B25014I (Occupants per Room)
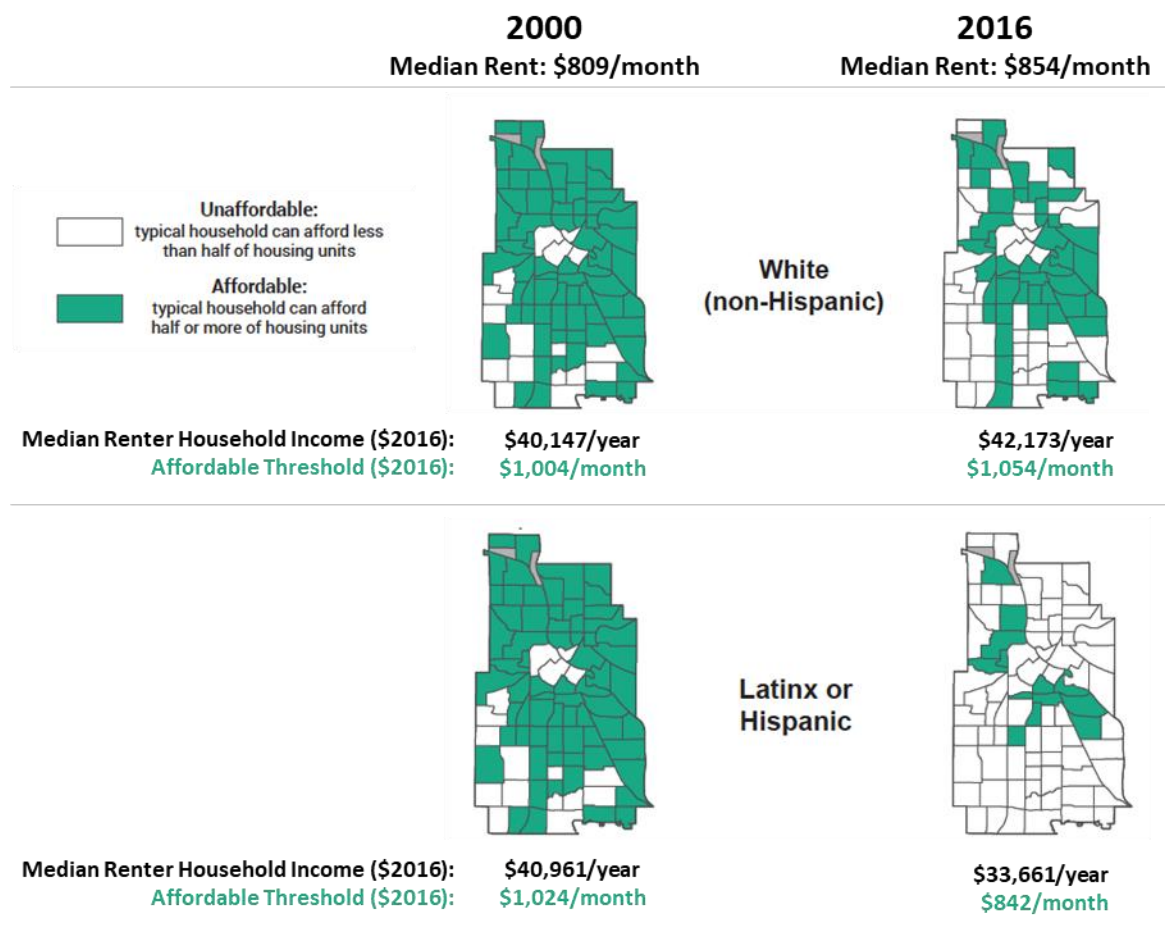
Neighborhood access

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

	2000 Median Rent: $809/month	**2016** Median Rent: $854/month
White (non-Hispanic)		
Median Renter Household Income ($2016): Affordable Threshold ($2016):	$40,147/year $1,004/month	$42,173/year $1,054/month
Latinx or Hispanic		
Median Renter Household Income ($2016): Affordable Threshold ($2016):	$40,961/year $1,024/month	$33,661/year $842/month

Unaffordable: typical household can afford less than half of housing units

Affordable: typical household can afford half or more of housing units

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 rate[96] 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.

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[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 Impediments[98] 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 choice[99] 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.

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[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.

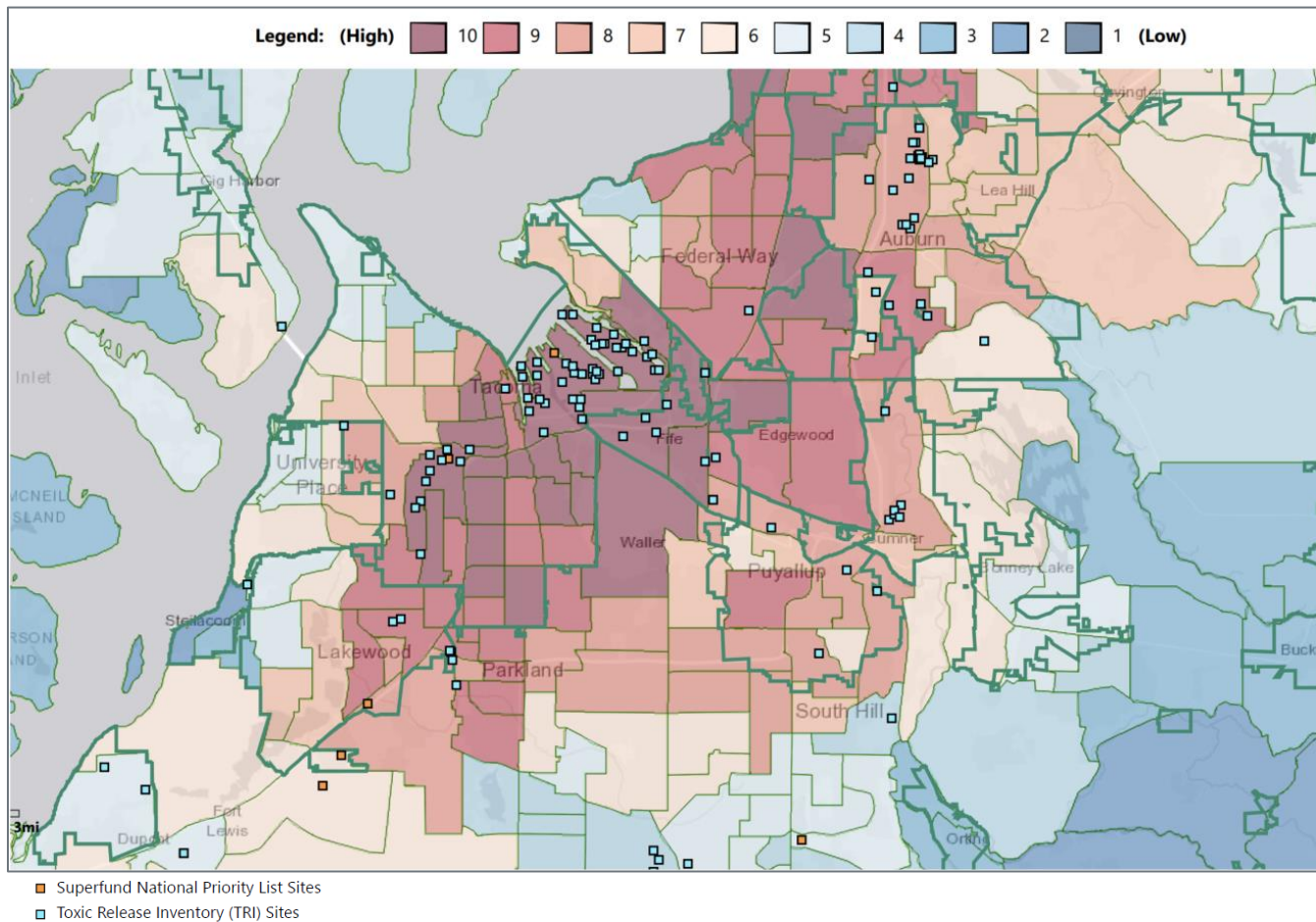## Disparities in environmental health hazards

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

□ Superfund National Priority List Sites
□ Toxic Release Inventory (TRI) Sites

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
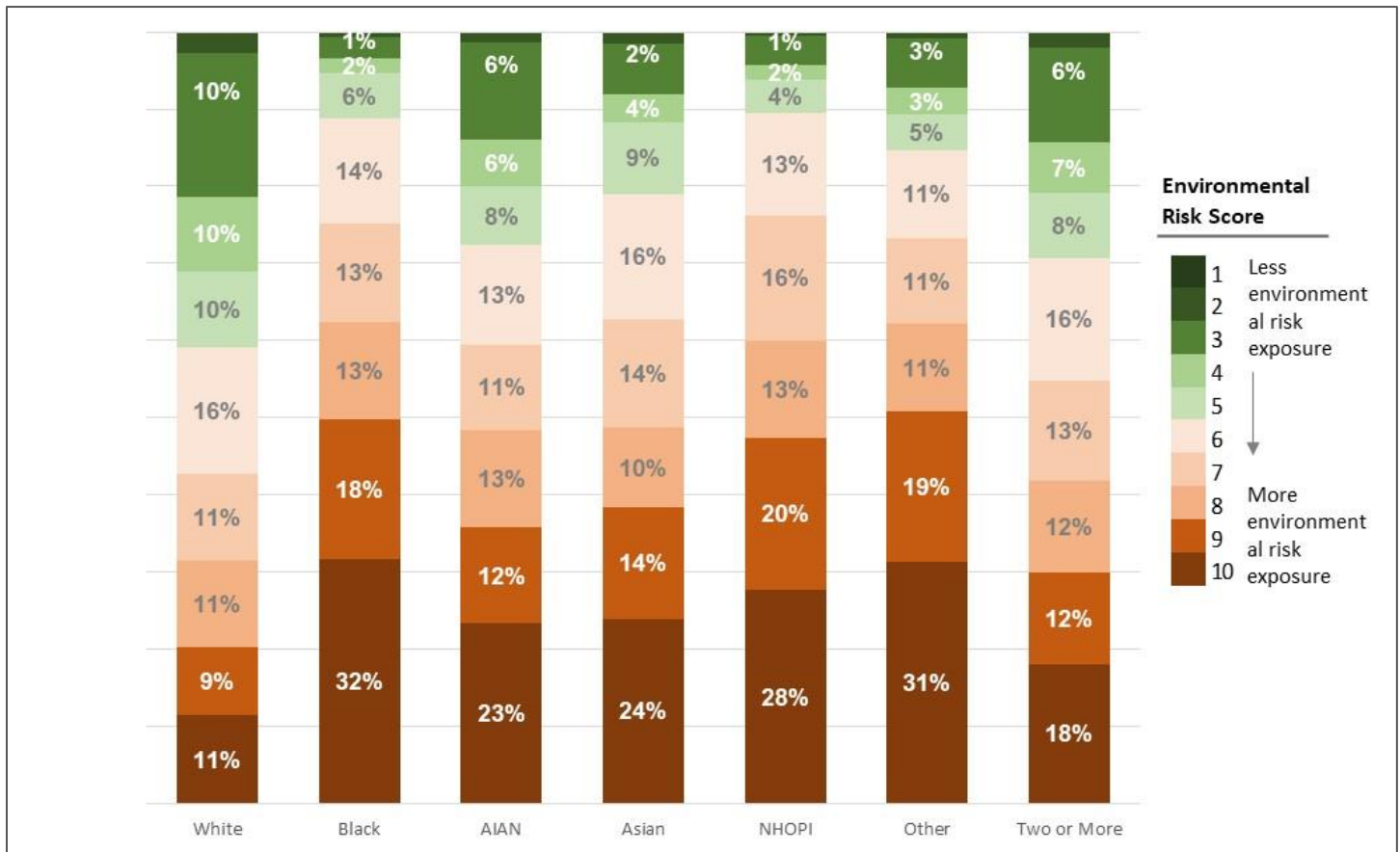
Source: Washington Environmental Health Disparities Map, 2022 (variable data 2014 – 2020); U.S. Decennial Census, 2020; BERK 2020

Data sources:
- [Washington Environmental Health Disparities Map | Washington State Department of Health](https://doh.wa.gov/data-statistical-reports/washington-tracking-network-wtn/washington-environmental-health-disparities-map)[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

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[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.
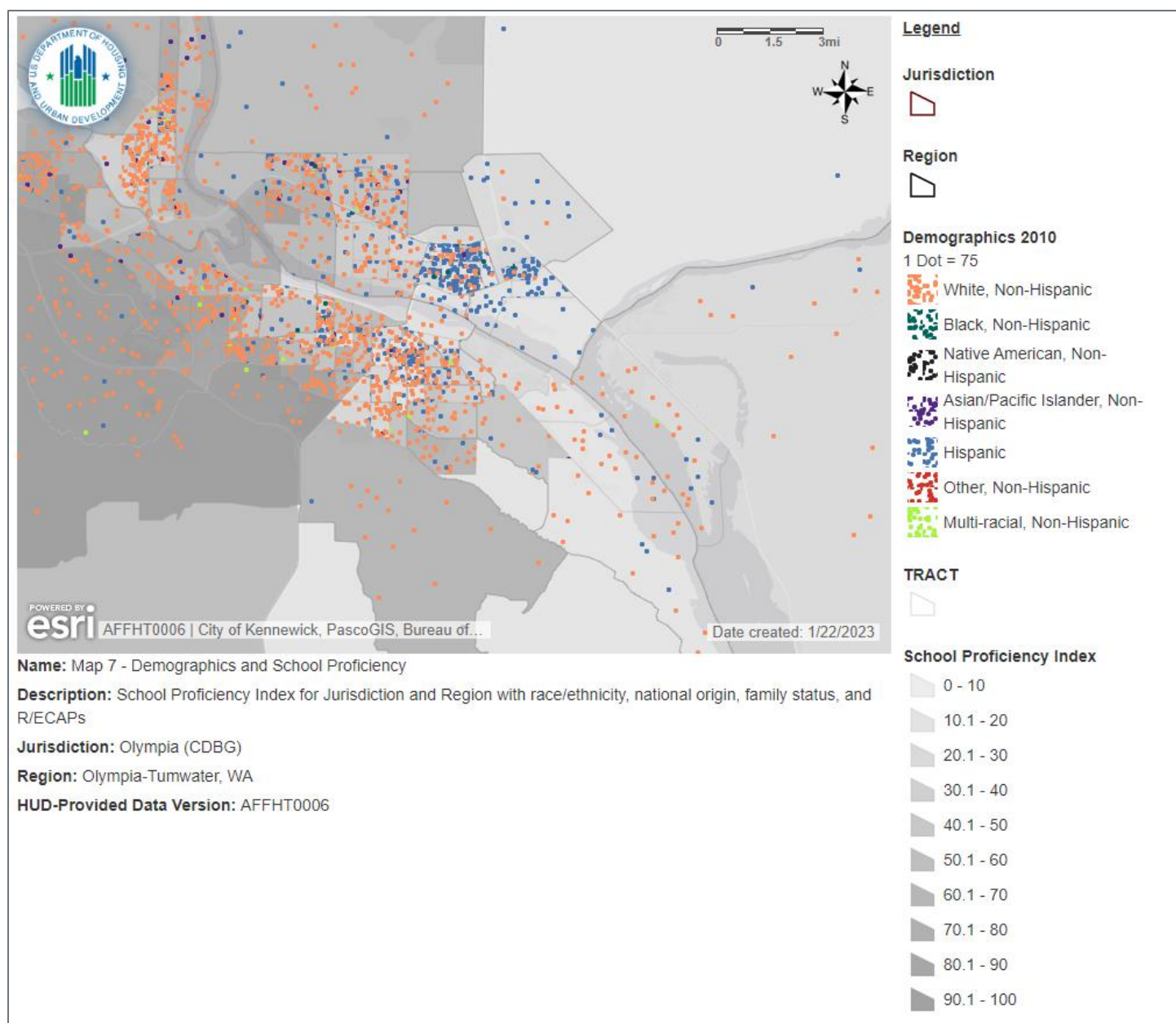
HUD's Affirmatively Furthering Fair Housing resources Map 7 maps a School Proficiency Index by block group. The School Proficiency Index uses school-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which 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.

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[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](url)[105] (for school quality)
- ⭘ HUD's [Affirmatively Furthering Fair Housing Tool,](url)[106] including Map 7 (Demographics and School Proficiency)
- ⭘ [OSPI](url)[107] for racial composition of students (search "race")

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[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
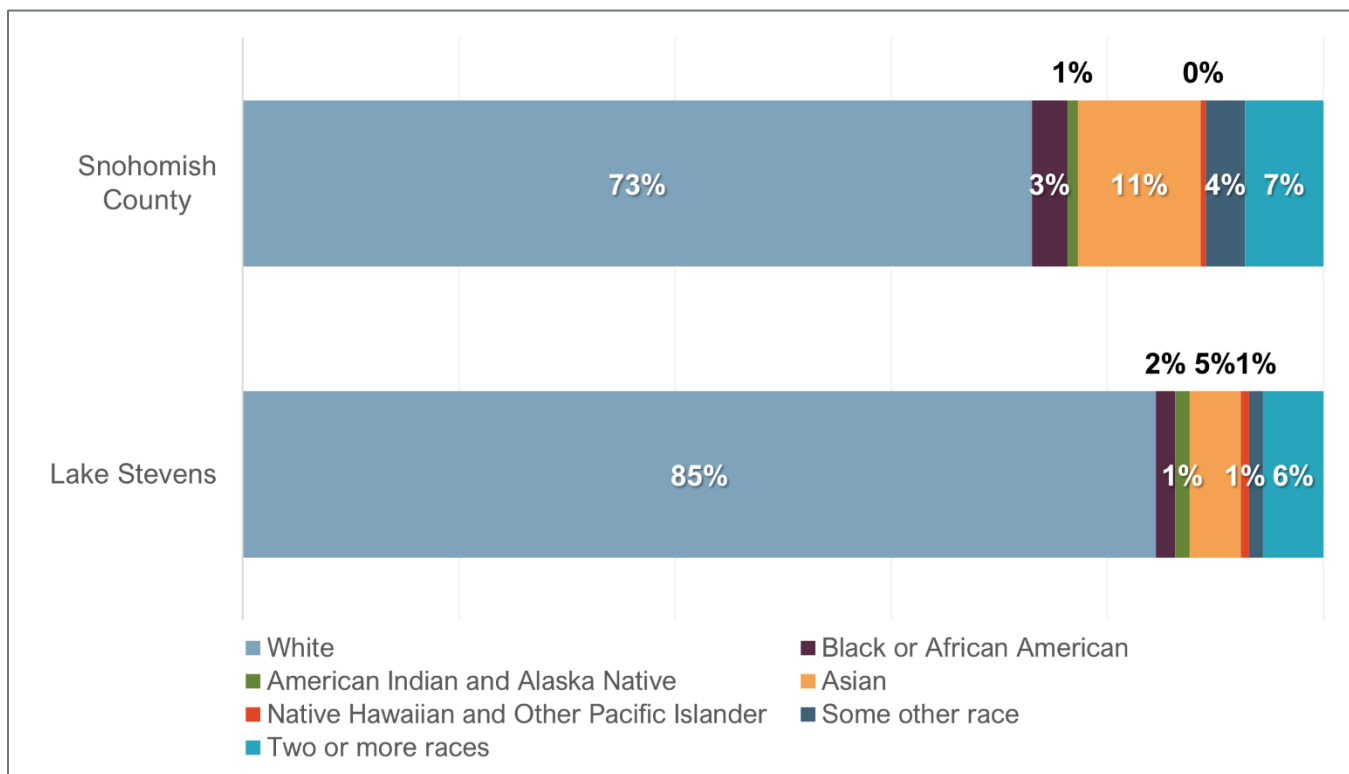
Source: US Census Bureau, 2016-2020 American Community Survey 5-Year Estimates

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
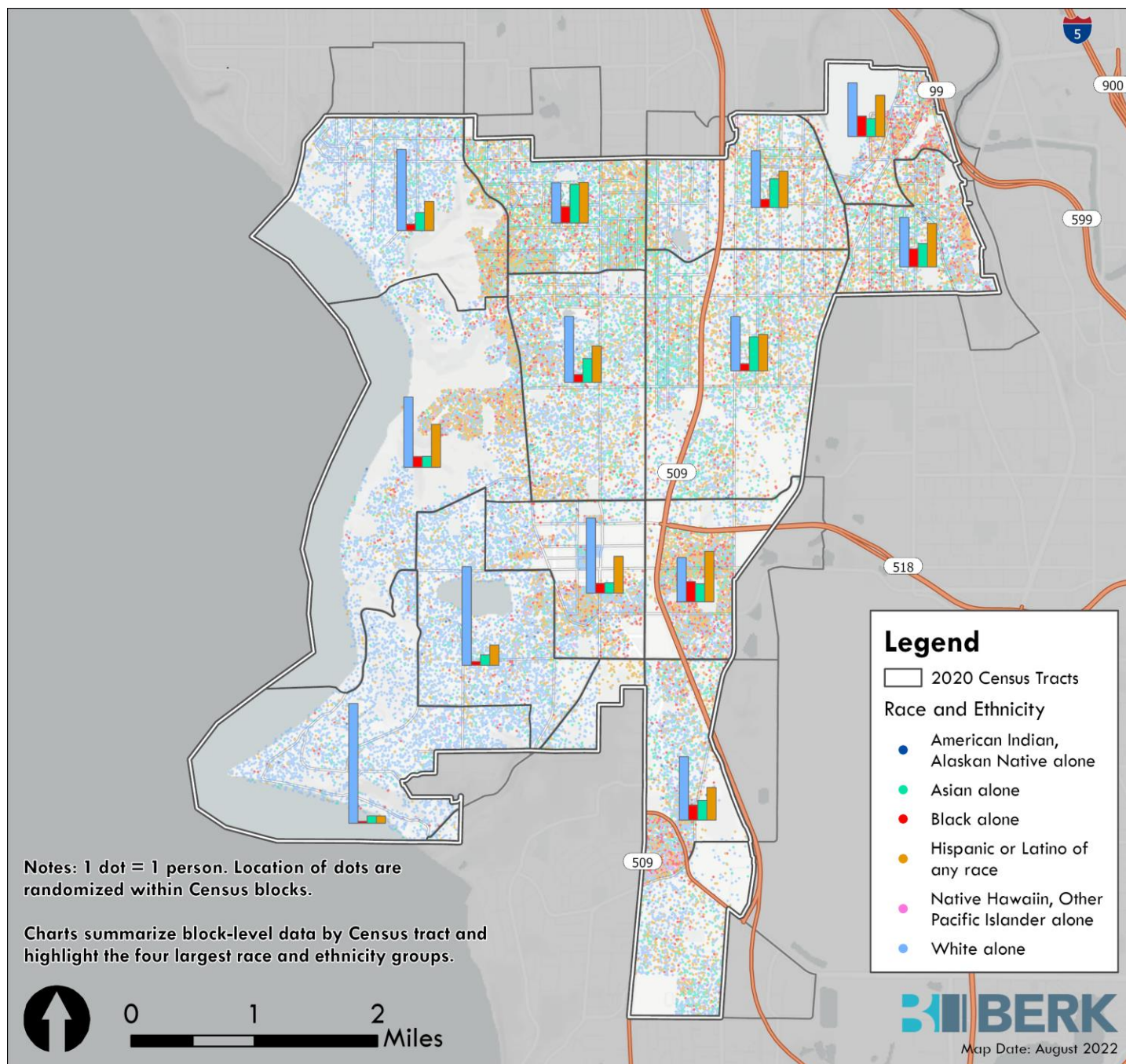
Sources: US Census Redistricting Data (PL 94-171), 2020; BERK 2022

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)
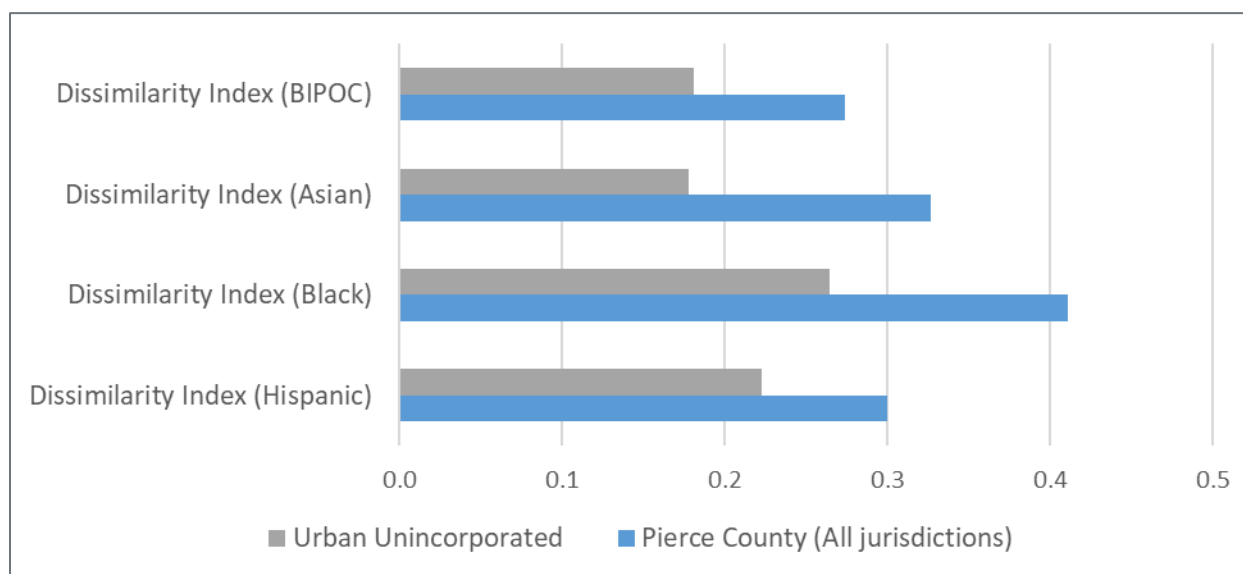

Dissimilarity index

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

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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]
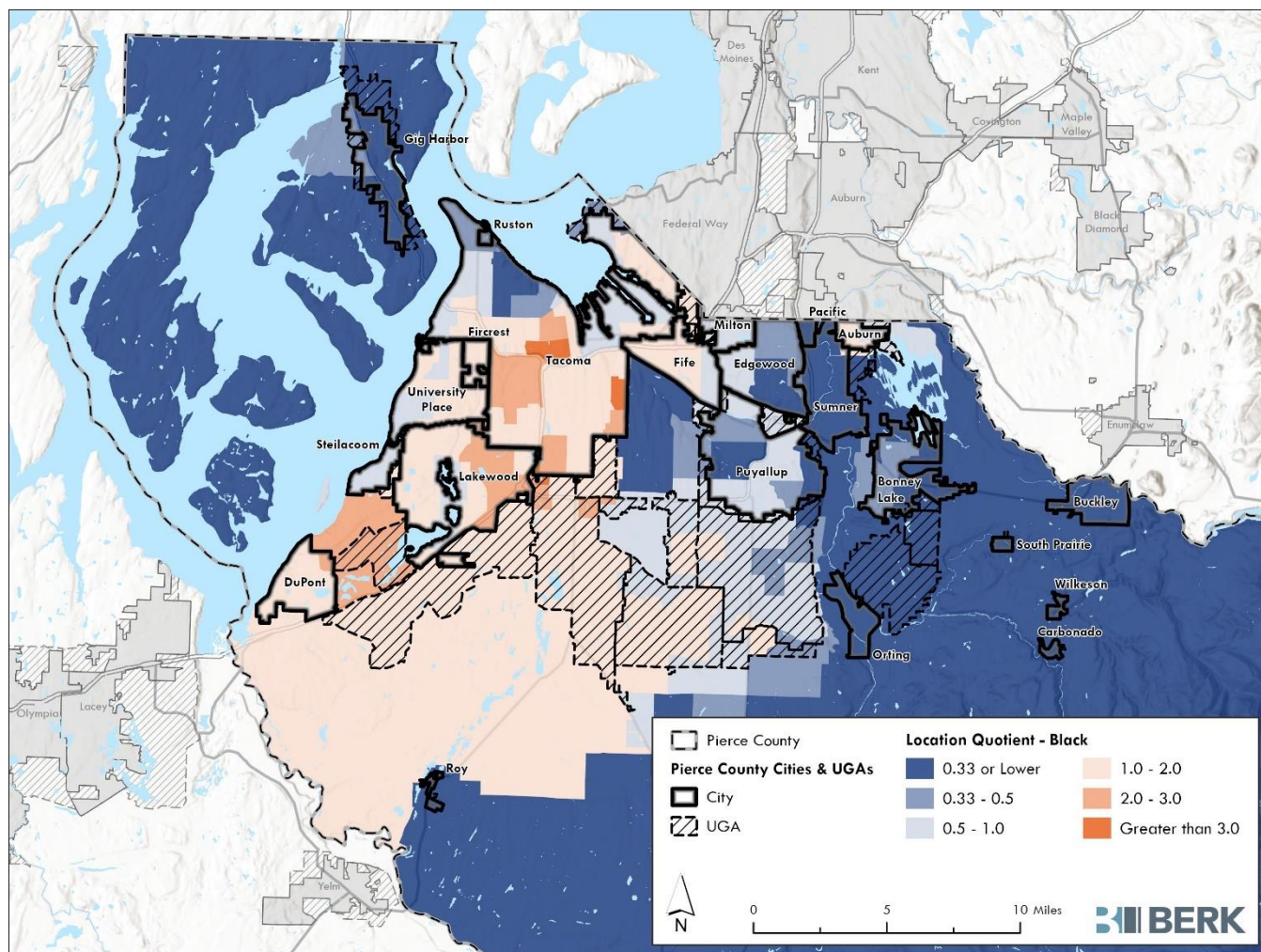
Location quotient

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.

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[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
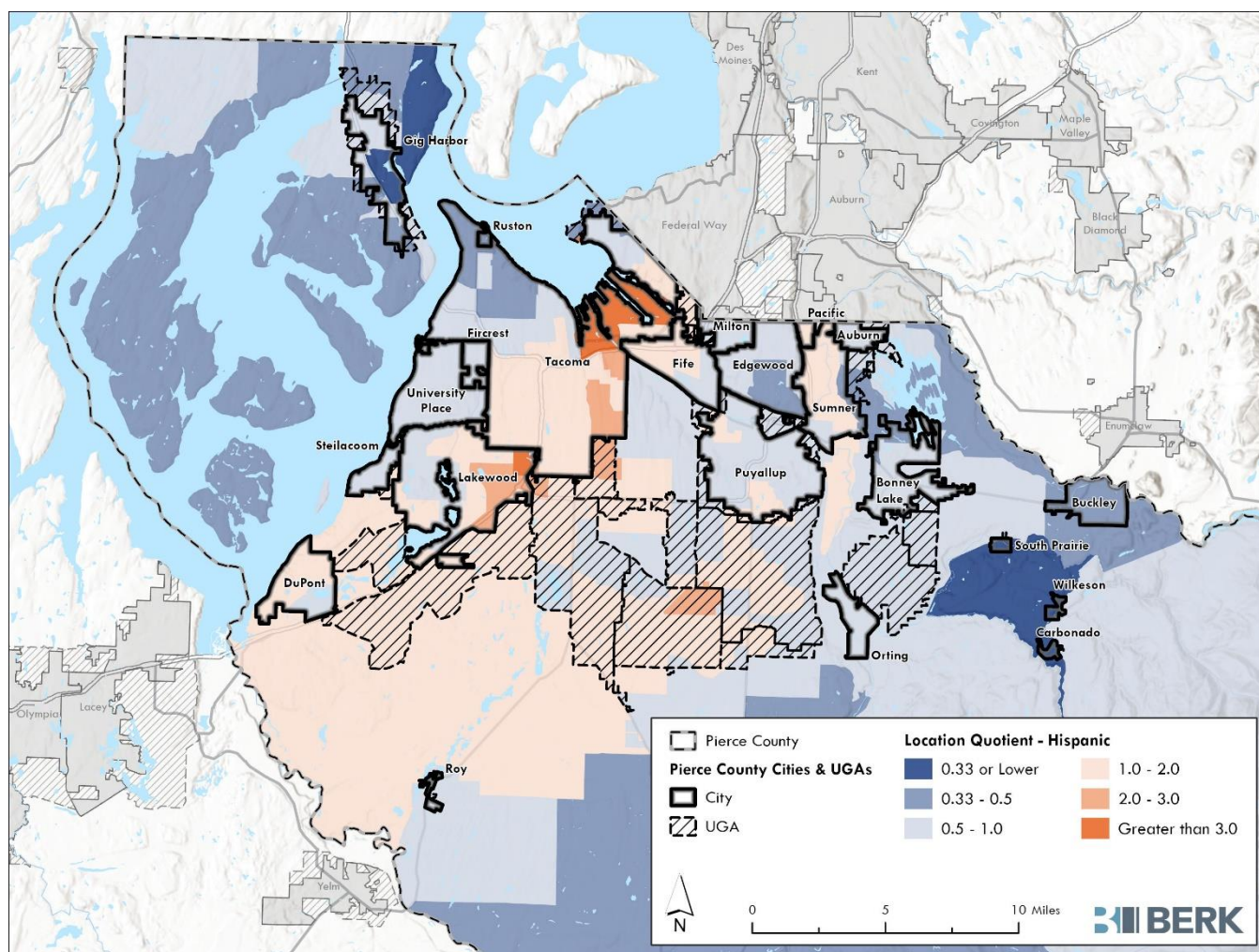
Source: Census, 2020; BERK, 2022

Data sources:
o 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
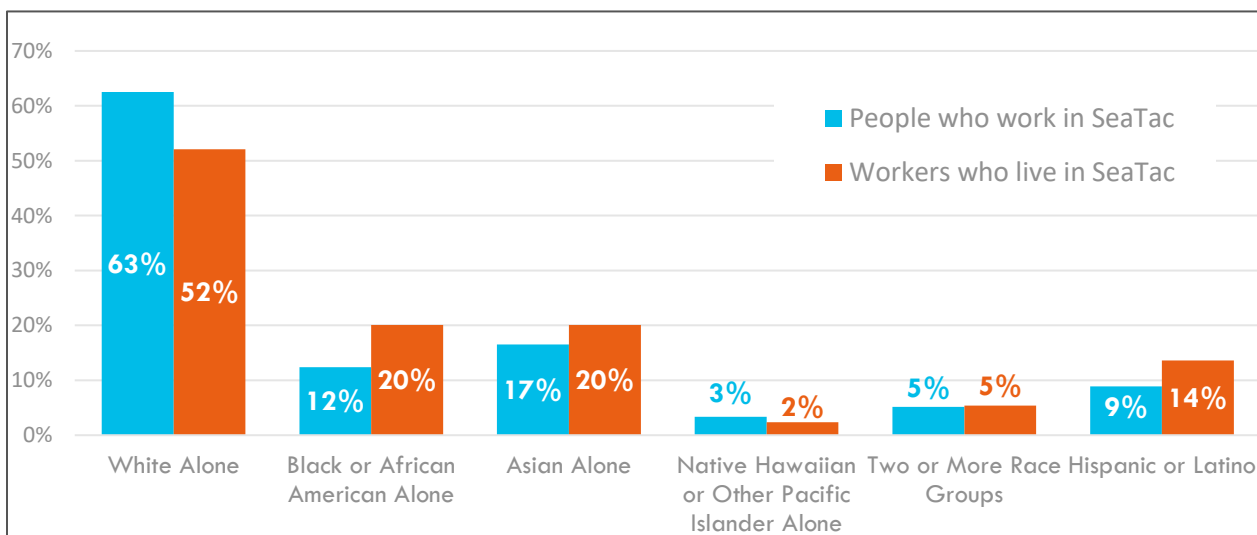
Source: U.S. Census Bureau, OnTheMap Application and LEHD Origin-Destination Employment Statistics, 2019

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
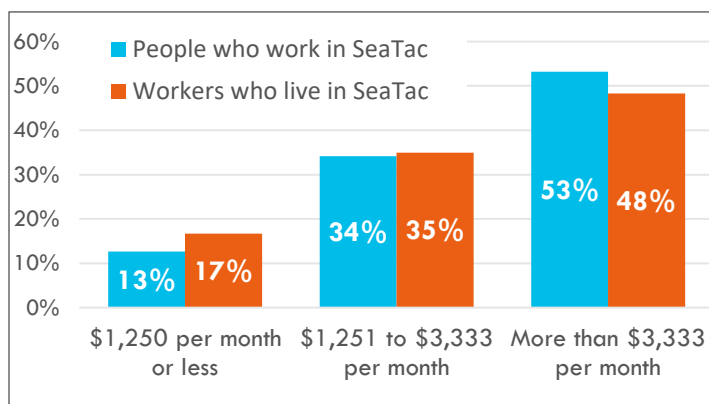
Source: U.S. Census Bureau, OnTheMap Application and LEHD Origin-Destination Employment Statistics, 2019

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.
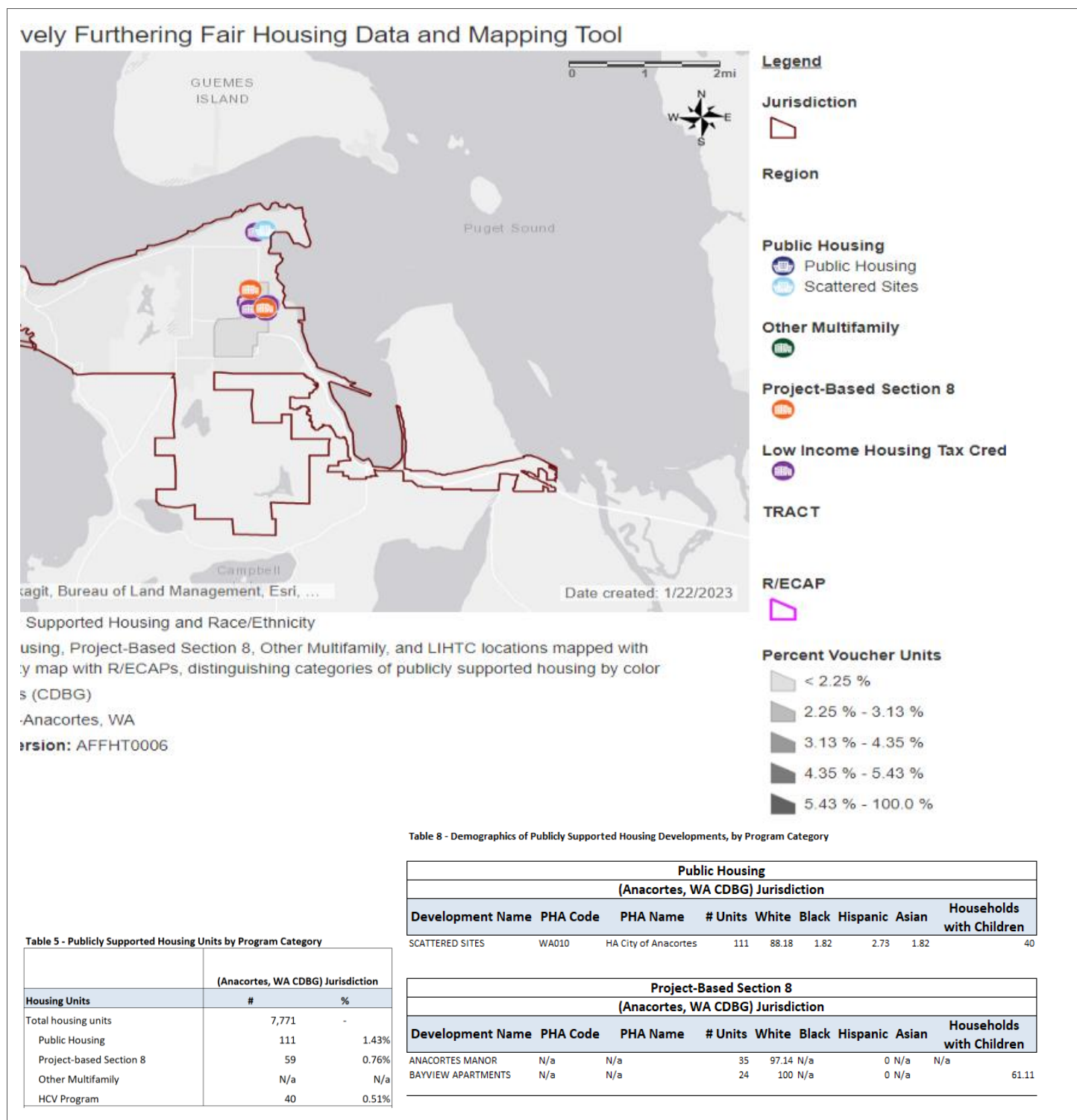
Data on publicly supported affordable housing is maintained by various administrative agencies. There are national datasets for federally supported housing, datasets for state supported housing, and your local jurisdiction may have locally supported or privately funded income-qualified housing. For federal 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

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[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

Table 5 - Publicly Supported Housing Units by Program Category

Housing Units	(Anacortes, WA CDBG) Jurisdiction	
	#	%
Total housing units	7,771	-
Public Housing	111	1.43%
Project-based Section 8	59	0.76%
Other Multifamily	N/a	N/a
HCV Program	40	0.51%

Table 8 - Demographics of Publicly Supported Housing Developments, by Program Category

Public Housing								
(Anacortes, WA CDBG) Jurisdiction								
Development Name	PHA Code	PHA Name	# Units	White	Black	Hispanic	Asian	Households with Children
SCATTERED SITES	WA010	HA City of Anacortes	111	88.18	1.82	2.73	1.82	40

Project-Based Section 8								
(Anacortes, WA CDBG) Jurisdiction								
Development Name	PHA Code	PHA Name	# Units	White	Black	Hispanic	Asian	Households with Children
ANACORTES MANOR	N/a	N/a	35	97.14	N/a	0	N/a	N/a
BAYVIEW APARTMENTS	N/a	N/a	24	100	N/a	0	N/a	61.11

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.

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[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.

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[118] https://www.realtytrac.com/

Exhibit 34. Eviction filing rate for City of Yakima and percent of census tract that is Hispanic, 2018
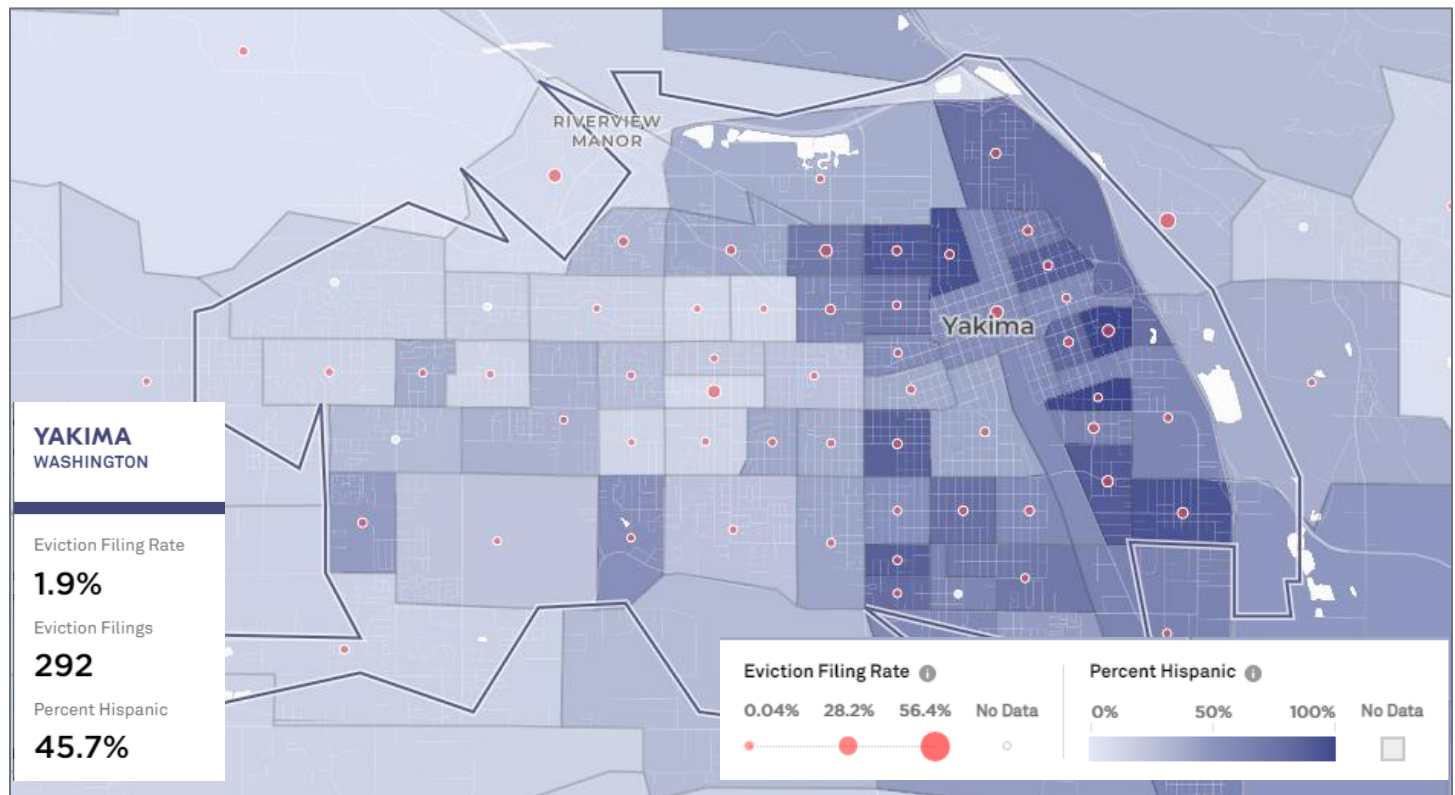
Source: Eviction Lab, Princeton University, www.evictionlab.org. Data for Yakima downloaded on 8/9/2022

Data sources:

○ The Eviction Lab[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[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

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[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

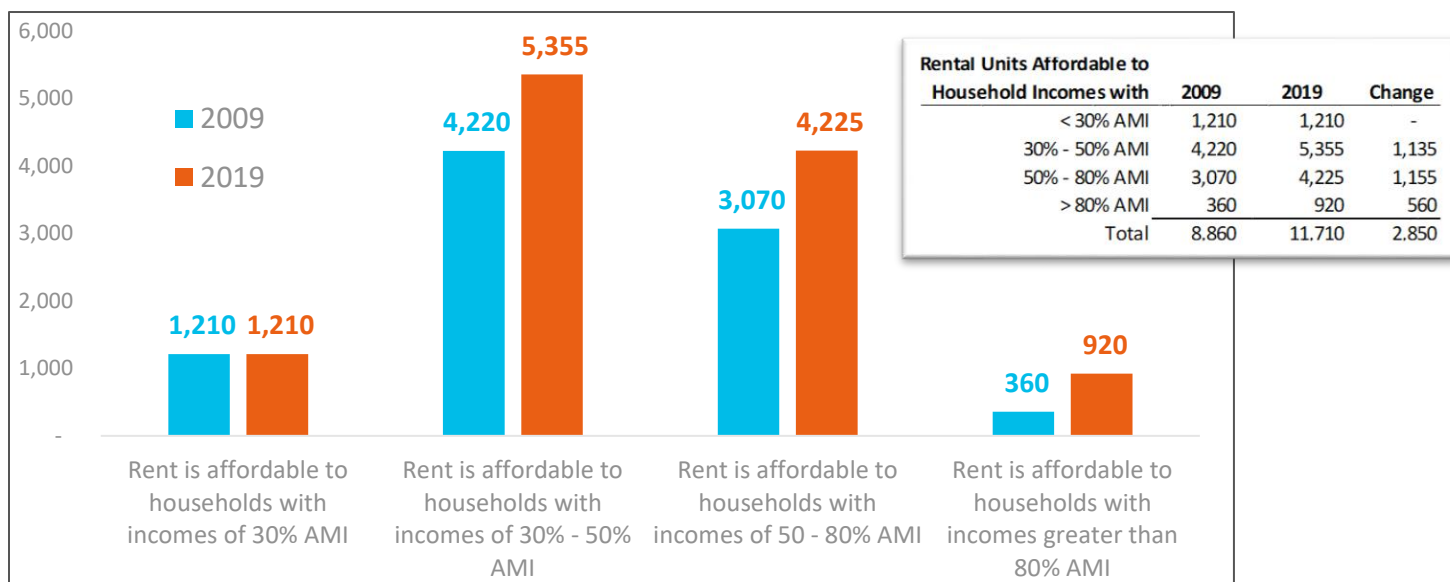| Housing Type	2010 Est. (2006-2010 ACS)	2018 Est. (2014-2018 ACS)	Change
Single Family Detached	11,235	12,394	1,159
Townhouses / Plexes	2,631	2,693	62
Multi-family (5+)	2,936	2,856	(80)
Mobile homes/other	1,230	1,149	(81)
Total	18,032	19,092	1,060

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 Affordable to Household Incomes with	2009	2019	Change
< 30% AMI	1,210	1,210	-
30% - 50% AMI	4,220	5,355	1,135
50% - 80% AMI	3,070	4,225	1,155
> 80% AMI	360	920	560
Total	8.860	11.710	2.850

*Rental units with complete kitchen and plumbing facilities
Source: HUD CHAS (Comprehensive Housing Affordability Strategy) data based on 2005 – 2009 and 2015-2019 ACS 5-year average data (Table 15C); BERK, 2023

Data sources:
- U.S. Census ACS
- Office of Financial Management housing unit counts
- HUD CHAS data (Table 15)

Closure of manufactured home parks

Manufactured Home Parks (MHPs) offer a unique housing option that is often more affordable than other housing options. MHPs provides a unique housing option that combines some of the benefits of homeownership with lower cost points. Most manufactured homes and manufactured home parks provide quality housing at price points that are more affordable than site-built housing that is similarly located and sized. Manufactured homes are disproportionately occupied by older adults compared to other housing types and may have fixed incomes.

The primary benefit to the homeowner is that by owning the housing unit, the monthly costs are less expensive than similarly sized homes elsewhere. Many residents of MHPs value the configuration of small units that are not attached to one another, allow for private exterior spaces, enable residents to keep their vehicle (often their second most valuable asset) close to their home, the tight-knit community and lack of through traffic. Ownership of the unit also allows for more flexibility in décor and layout.

Once manufactured homes are sited, they are largely immobile. Residents in MHP communities often lack the option to easily move their manufactured home to another park. Moving a manufactured housing unit is costly and could potentially damage the unit. Since market rate housing and apartment rentals are often out of the price range for many MHPs homeowners, they are functionally a captive market and vulnerable to increased

fees by park management and displacement if the MHP is converted to other uses.[121] Residents are frequently displaced out of the community when parks close.

Owners of MHPs are required to register the park with the Department of Commerce, which maintains a list of all registered parks.[122] As of October 2022, there were 1,139 MHPs registered in Washington containing more than 57,000 home sites. Tenants in smaller MHPs, MHPs with older housing units, MHPs that are owned by individuals, and/or are located in non-residential zones may be at higher risk of displacement due to parks closing. State law requires that MHP owners provide twelve months' notice to the Department of Commerce when they plan to close the park. Commerce can then provide support to impacted tenants through the Manufactured/Mobile Home Relocation Assistance Program. Commerce tracks how many parks have closed and the number of impacted households.[123]

Exhibit 37. Number of spaces in closed registered manufactured home parks, City of SeaTac, 2019 – 2023
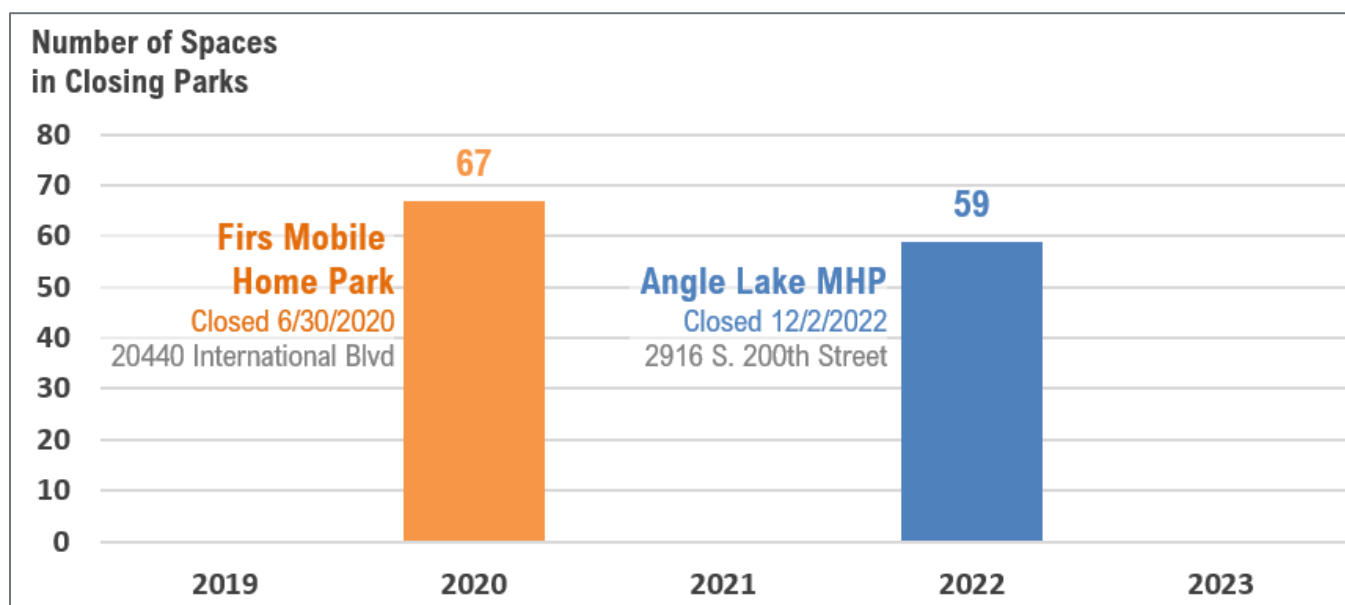
Source: Department of Commerce, 2023

Data sources:
- Department of Commerce [Registered Manufactured/Mobile Home Communities in Washington (Excel)](124)
- Department of Commerce [Manufactured/Mobile Home Community Closure List (PDF)](125)

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[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/kngyqojutjrpd8vhbwgp9q4sighmk9r5.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.

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[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
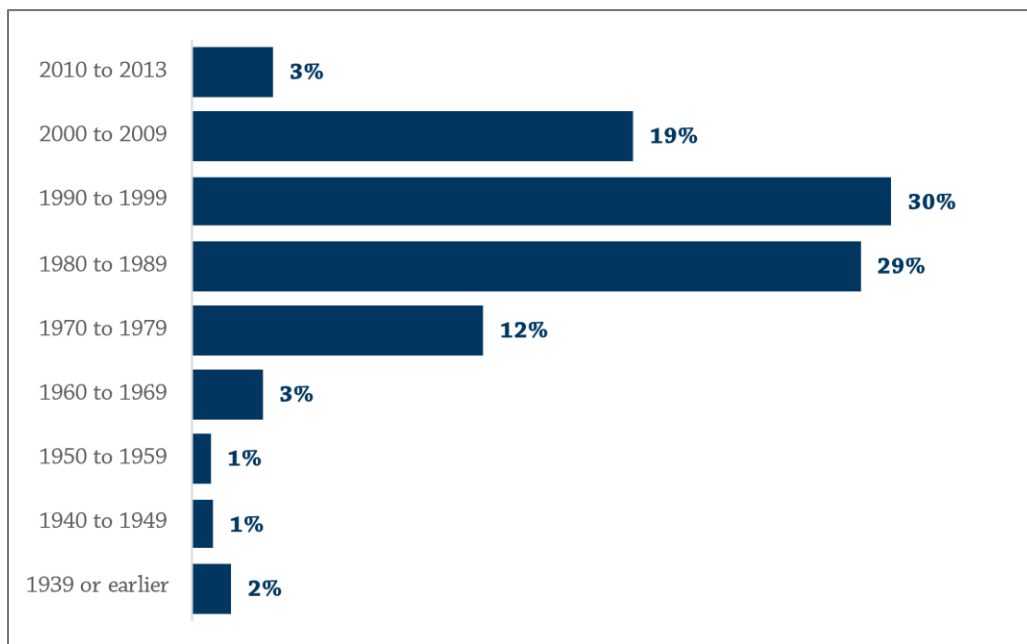
Source: American Community Survey 2014 – 2018 (Table B25034); BERK, 2016

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 assessment[128] 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. Risings 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]

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[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)

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[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
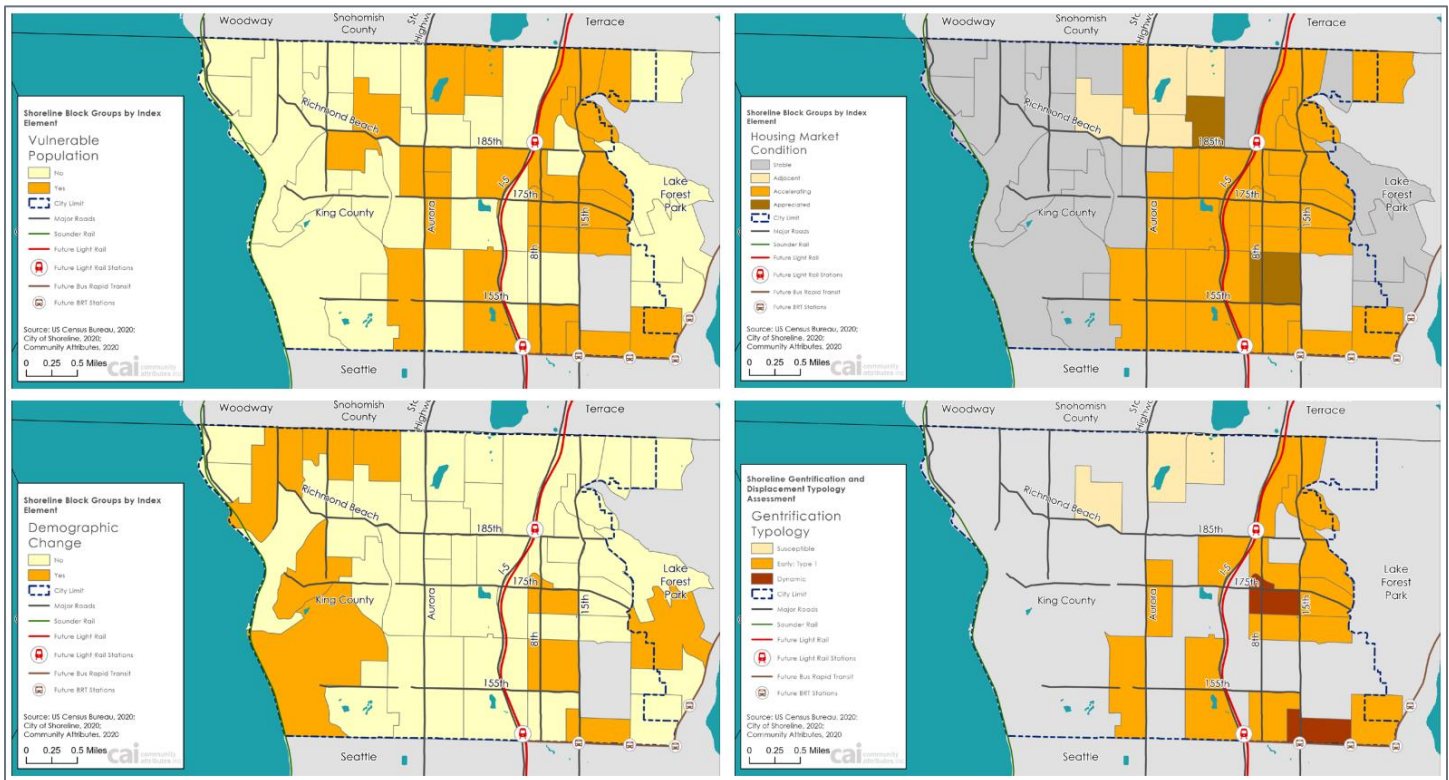
	Number of Block Groups	Population	Households	Household Income Below 80% AMI	Cost Burndened Renter Households
Susceptible	3	4,815	2,370	2,917	1,153
Early: Type 1	13	15,787	6,183	4,428	1,474
Early: Type 2	0	0	0	0	0
Dynamic	2	2,309	814	786	280
Late: Type 1	0	0	0	0	0
Late: Type 2	0	0	0	0	0
Continued Loss	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.133 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

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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.

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[134] Technical documentation is available at the CDC's Place and Health website. See https://www.atsdr.cdc.gov/placeandhealth/svi/documentation/pdf/SVI2018Documentation_01192022_1.pdf.

Exhibit 41. City of Spokane displacement risk map (2018) from the Spokane Housing Action Plan
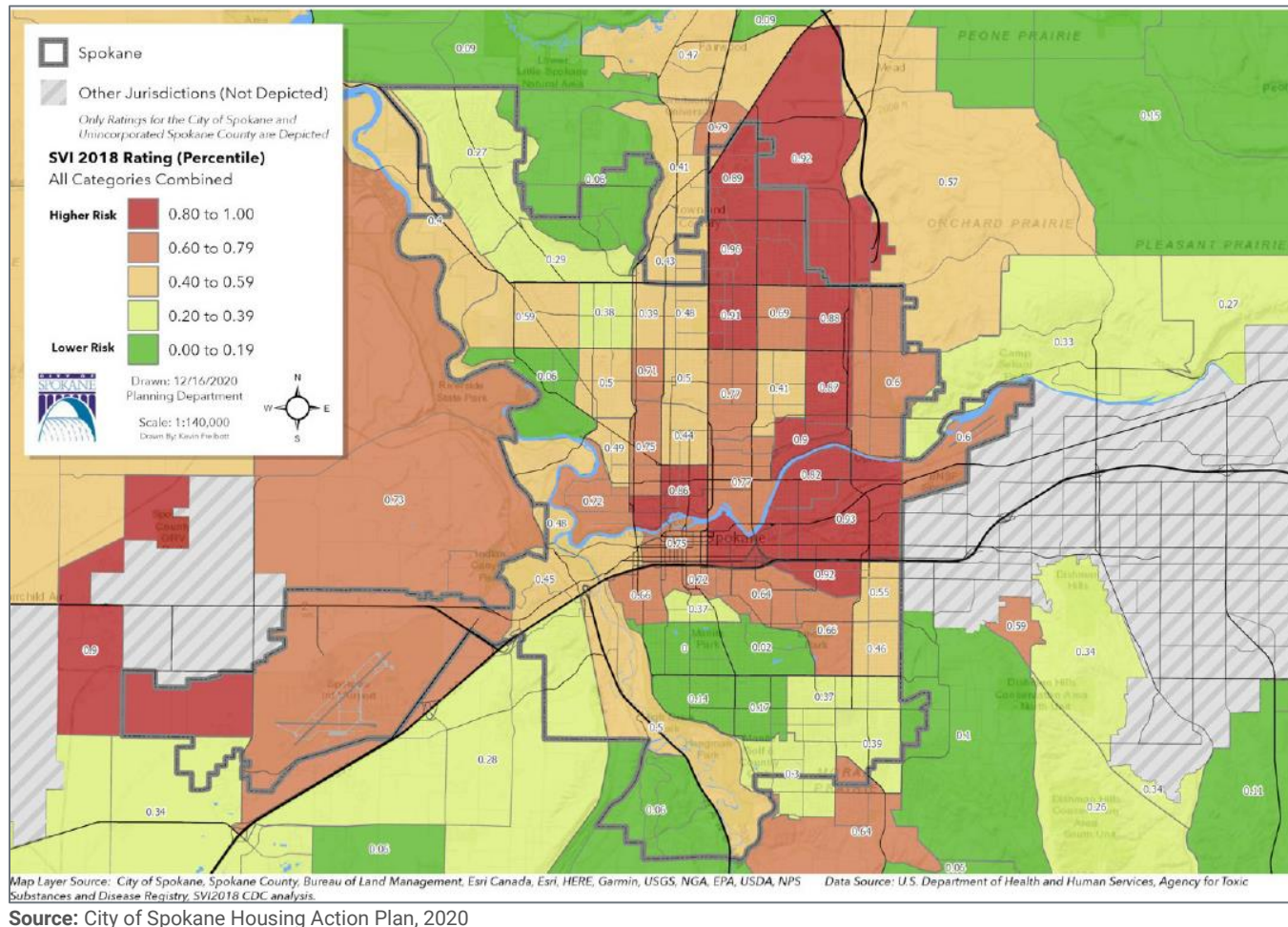
Source: City of Spokane Housing Action Plan, 2020

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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.

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.

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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	Generate revenue for affordable housing • 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 Increase affordable housing production • 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	• 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	Homeownership programs • 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 Rental assistance Tenant protections • 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	• 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:

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[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](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](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](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](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](RCW 67.28.150)) or revenue bonds ([RCW 67.28.160](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 communities[137] 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.

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[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 counties[138] 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% AMI. 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.

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[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	**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. **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). • Bellingham Housing Sales Tax, Levy Funds, CDBG Funds and Housing Constructed as of 2021 (see Funding tab) **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. • Jefferson County Sales Tax Ordinance, Housing and Related Services, 11-1221-20 **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. • 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
	this housing is available throughout the community for people of all income levels and special needs. • Example: <u>Building Opportunity and Choices for All</u> pilot program allowing attached homes, duplexes, triplexes, and fourplexes citywide. **Missing Middle Housing:** <u>Langley, H-1.3:</u> 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. **Remove Permit Barriers:** <u>City of Yakima 5.1.10:</u> 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. **Surplus Land:** <u>City of Chelan Policy HO V-5</u>: 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. • 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	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. 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.
Mobile home park preservation	Snohomish County, Housing Element 1.B.3: The county shall support the development and preservation of mobile and manufactured home parks. • 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. 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. • Example: City of Chelan Mobile Home Park Zone 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. • Example: City of Bothell Mobile Home Park Overlay zoning classification (BMC 12.04.100)
Third-party purchases of existing affordable housing	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.
Community Land Trusts	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. • Example: Homestead Community Land Trust, Greater Seattle/King County area 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. • 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	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. Lakewood, LU-2.6: Encourage home ownership opportunities affordable to moderate income households. Lakewood Station District Subarea Plan: Encourage homeownership options that allow local residents to invest in the community to gain equity and wealth.
Rental assistance	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.
Tenant protections	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. • Example: Renton Rental Registration Program 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. • Example: Tukwila Residential Rental Licensing and Inspection Program
Relocation assistance	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.
Anti-displacement, create permanently affordable housing	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.
Regulate short-term rentals	Chelan Housing Element, Policy H 2.4: Encourage appropriate placement and use of vacation rentals. • 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	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: • 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. *See Section 4.1 of Parks Plan, Equitable and Sustainable Access.* Parks funding prioritization based on equity. See Exhibit 1.1-10 and Appendix 12.3 Example Project Evaluation.

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.