

Welcome Home:
**Addressing Racially Disparate Impacts, Exclusion, & Displacement in
the Puget Sound Region**

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Executive Summary

This project uses a comparative process to analyze municipalities' incorporation of Washington State's historic House Bill (HB) 1220. HB 1220 mandates that cities address displacement, exclusion, and racially disparate impacts (RDI) in their comprehensive plans. This legislation is a response to the unprecedented housing crisis in Washington, and is an important step towards ensuring that Washingtonians of all socioeconomic statuses have their housing needs met. This is the first time any state in the United States has required cities to conduct an RDI analysis of their housing and land use policies to identify and rectify policies that perpetuate exclusion, displacement, and racially disparate impacts.

The Puget Sound Regional Council (PSRC) partnered with the authors, who are graduate students at the University of Washington's Evans School of Public Policy, to analyze the implementation of HB 1220 by conducting a comparative process analysis. By comparing comprehensive plans from multiple cities in the Puget Sound Region, the authors were able to identify strategies that will inform future municipal housing policy. This work aims to assist PSRC and cities in the region as they fulfill their commitment to housing policy that addresses and begins to undo displacement, RDI, and exclusion.

The authors reviewed the 2044 comprehensive plans of nine cities within the Puget Sound Region and conducted interviews with their respective city planners. This process allowed the authors to understand municipalities' planning process for incorporating HB 1220 requirements, and allowed us to evaluate policy alignment with evidence-based strategies for addressing displacement, RDI, and exclusion. **Kent, Kirkland, Lakewood, Lynnwood, Marysville, Port Orchard, Tacoma, Tukwila, and University Place** were selected to capture a sample of cities from all four Puget Sound counties while representing varying population sizes, racial/ethnic diversity, and displacement risk levels. The literature review identified evidence-based practices for addressing housing displacement, exclusion, and RDI, and also included examples of how other cities outside of Washington are addressing these issues. The analysis looked at:

- **Municipal processes** for incorporating data, information, and community feedback when writing the housing elements of their comprehensive plans.
- **Comprehensive plan policies** cities included to address HB 1220 requirements, whether they included evidence-based strategies, and how the policies were framed (i.e. level of accountability, orientation of the policy, and level of detail).

Findings

Upon analyzing the processes and policies used to incorporate HB 1220, the authors identified the following:

- **Population size, racial/ethnic diversity, and displacement risk level do not appear to explain variation in policies and their framing across cities:** The level of accountability, orientation, level of detail, and alignment with HB 1220 varies widely throughout cities and policy areas. However, few overarching patterns in variation were apparent based on level differences in population, racial/ethnic diversity, or displacement risk. Therefore, a city's size, racial/ethnic makeup, and displacement risk are not the only factors that inform how cities address racially disparate impacts, displacement, and exclusion.

- **Targeted community engagement is associated with strong policies and accessible plans:** Cities who had well-written policies that addressed RDI, exclusion, and displacement engaged with underrepresented citizens in nontraditional ways and by forming strategic partnerships, demonstrating a growth mindset, and reinforcing connection through repeated touches.
- **All cities experience challenges funding affordable housing at all income levels:** Despite cities' varying levels of economic activity and prior housing work, all cities experience barriers to funding affordable housing at all income levels, particularly for very-low income households.
- **A broad spectrum of policy tools were used to address HB 1220:** Due to the complexity of the current housing crisis, historic housing inequities, and impact that neighboring municipalities' have on one another, cities used multiple policy tools to address exclusion, displacement, and racially disparate impacts.
- **Varying understandings of RDI, displacement, and exclusion resulted in different ways of meeting the HB 1220 requirements:** Because it was the first time municipalities had to conduct an RDI analysis and explicitly address RDI, displacement, and exclusion in their comprehensive plans, expertise and knowledge gaps existed between different municipalities. Municipalities with more understanding of these issues created more tailored policies to address them.

Recommendations for Planners

- **Write Detailed, Specific, and Actionable Policies:** Policies that use detailed, specific, and actionable language asserts the city will actually implement the policy fully to address racially disparate impacts, displacement, and exclusion. Whereas, vague and unactionable policies imply goals and aspirations of cities but do not direct the city to make tangible changes to address these issues.
- **Make Comprehensive Plans Accessible to All Community Members:** Making comprehensive plans more accessible to all community members helps to address barriers marginalized communities face to engaging in the planning and implementation processes that directly impact them. Design comprehensive plans using visuals with clear descriptors, navigable table of contents and webpages and non-jargon language. Additionally, plans should be available in the most common languages spoken in the respective municipality. Finally, the planners should maintain the cohesiveness of the entire plan.
- **Conduct nontraditional, targeted community engagement:** The authors' analysis and research showed that comprehensive plans benefit from nontraditional community engagement strategies targeted towards historically marginalized and underrepresented communities. These strategies include forming strategic partnerships, demonstrating a growth mindset, and reinforcing connection through repeated touches. Centering people in the planning process facilitates housing policy that serves the people who will live, work, and thrive in their homes and communities.

Recommendations for Elected Officials

- **Support Planners and Other Municipal Employees Through Collaborative Governance:** Due to the capacity constraints planners experienced when drafting their comprehensive plans

with the multitude of new state law requirements, planners need more support from city, county, regional, and state leaders. Providing opportunities for planners to directly engage with policy makers, empowering other departments to work with planners when developing the comprehensive plans, giving timely informational resources for planners, and identifying as many funding opportunities as possible to develop the plans would help address the capacity constraints planners face in developing and implementing policies.

- **Develop a shared understanding of displacement, RDI, and exclusion:** Due to the innovative nature of HB 1220, it is unsurprising that cities varied in their understanding of these issues and how best to address them. Those with the largest knowledge gap will have a greater amount of work and need a greater amount of time in the future to undo displacement, exclusion, and RDI in the future. Interactive training, a community of practice, and nontraditional community engagement opportunities should be made available to city planners to develop a more holistic view of the historic and current policies that are perpetuating RDI, displacement, and exclusion.
- **Monitor Impact of HB 1220:** Comprehensive plans can address RDI, displacement, and exclusion through policymaking, but more needs to be done to begin to undo historic inequities in housing. Cities must continue to monitor the impact of these groundbreaking policies shaped by HB 1220 to achieve meaningful, sustainable change in RDI, displacement, and exclusion.

Tip

- Look out for green boxes throughout the paper – these sections include helpful summaries for busy people who prefer a quick read.

Tip

Look out for orange boxes throughout the paper - these sections include examples of policies from municipalities outside of the Puget Sound Region.

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Finally, we would like to thank you—the reader—for taking the time to read through this report. We hope you enjoy reading it as much as we did writing it.

Positionality Statement

We have conducted this research on and for municipalities on the unceded ancestral lands of the Coast Salish peoples. The Coast Salish people have resided here since time immemorial and have a deep connection to the land and resources. Our client, PSRC, supports meaningful ongoing exchange with Tribes to better inform decision making and undo historical lasting inequities.

We would like to acknowledge that our various identities have impacted the development of our research and this report. We recognize as graduate students at the University of Washington, working within a system of higher education, we all have certain privileges that have allowed us to be in the position to do this work. We recognize that we approached and interpreted the results from this project in various ways as we are all informed by our unintentional biases and lived experiences.

About the Authors

Joaquín Bosch (he/him) is a college-educated cis-gender man originally from Argentina and living in Seattle as an international student. His professional background is urban and regional planning. He acknowledges the unconscious biases he brings to this research as a researcher without lived experience in the Puget Sound region or the United States.

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Glossary

Accessory Dwelling Units (ADU)

A secondary, smaller residential unit located on the same lot as a primary single-family home.

Affordable Housing

Housing is considered affordable when its cost, mortgage or rental payments, do not exceed 30% of a household's income.

Comprehensive Plan

Required under the Washington State's Growth Management Act (GMA), Comprehensive Plans are long-term policy documents that guide a city's growth and development over a 20-year period, establishing a framework for land use, housing, capital facilities, utilities, transportation, economic development, and parks, recreation, and open spaces.

Countywide Planning Policies (CPPs)

Required under the Washington State's Growth Management Act (GMA), countywide policies provide a framework from which county and city comprehensive plans are developed and adopted.

Development Regulations

Rules imposed by local governments to manage land use and development, including zoning laws and subdivision rules.

Displacement

The forced relocation of individuals or households from their homes due to various factors such as rising costs or redevelopment.

Cultural Displacement

When individuals choose to relocate because their culturally significant businesses, community organizations, and neighbors have moved away.

Economic Displacement

When rising housing costs force
<https://mynorthwest.com/local/pickleball-courts-rv-lot-seattle/4091501> residents to relocate due to financial constraints.

Physical Displacement

The forced relocation of residents due to eviction, redevelopment, property acquisition, or the expiration of affordability restrictions.

Displacement Risk

The likelihood that a household, business, or organization will be forced to relocate from its community.

Emergency Housing

Temporary indoor accommodations for individuals or families experiencing or at risk of homelessness.

Emergency Shelter

A facility offering short-term shelter for people experiencing homelessness. It may also include day or warming centers that do not provide overnight stays.

Exclusion

Occurs when certain populations are prevented from accessing housing within a specified area, either intentionally or unintentionally.

Exclusionary Zoning

Land use regulations that restrict certain types of housing, often limiting the development of affordable or diverse housing options in a community.

Form-Based Code

A regulatory approach that prioritizes physical design and urban form to create consistent development patterns and high-quality public spaces.

Growth Targets

The projected number of residents, housing units, or jobs that a city or county must plan for, as determined by countywide planning bodies in accordance with the Washington State's Growth Management Act (GMA).

Housing Abundance

is realized when there is an adequate supply of high quality, affordable housing that allows people to create stable, healthy, and thriving communities

Housing Action Plan

A local government strategy that outlines specific measures to implement established housing policies.

Infill Development

Developments that utilize vacant or underused land in already developed areas.

Land Use

The way land is utilized or designated for specific activities.

Middle Housing

Housing types that serve as a transition between single-family homes and high-density developments, such as duplexes and accessory dwelling units.

Mixed-Use

Development that integrates residential use with commercial, office, or retail uses.

Multi-county Planning Policies (MPPs)

Required under the Washington State's Growth Management Act (GMA), regional planning policies that guide growth and development across multiple counties help align city and county comprehensive plans with shared regional goals.

Naturally Occurring Affordable Housing (NOAH)

Residential properties with relatively low rents or purchase prices compared to the regional market, without subsidies from federal or state programs.

Policy

In the context of this document, a guiding principle designed to direct future decisions and actions to achieve a defined goal.

Racially Disparate Impacts (RDI)

When housing or land use policies, practices, rules, or other systems lead to a disproportionate impact on one or more racial groups.

Chapter 1: Introduction

This chapter introduces the project and its intended purposes. It includes a brief explanation of comprehensive planning processes in Washington State, and an overview of the Puget Sound Regional Council. The chapter concludes with a summary of the key findings and recommendations from the analysis.

1.1 Project Overview

In 2021, the Washington State Legislature passed HB 1220 - An Act Supporting Emergency Shelters and Housing Through Local Planning and Development Regulation (HB 1220). This bill required that all comprehensive plans include policies to address and begin to undo residential displacement, exclusion, and racially disparate impacts (RDI). Washington became the first state to mandate that these issues are addressed as part of the planning process – an innovative and historic step towards equitable, inclusive, and stabilizing housing policy.

This project conducts a comparative process analysis of comprehensive plans from municipalities from across the Puget Sound Region. It was made possible through a partnership between the Puget Sound Regional Council (PSRC), and the authors, who are graduate students at the University of Washington's Evans School of Public Policy. The authors evaluated HB 1220's incorporation into municipalities' comprehensive plans by analyzing the policy strategies and policy language used to address displacement, exclusion, and RDI. The authors selected 10 municipalities for comprehensive plan evaluation and conducted semi-structured interviews with the respective municipal planning staff.

This research identified common policy strategies for addressing displacement, exclusion, and RDI. It was guided by the research question described in Chapter 1.3 and will be used to inform future municipal housing policy as PSRC and Washington cities fulfill their commitment to equitable, inclusive, and stable communities for all people who call Washington home. The full set of recommendations and future research questions are found in Chapters 6 and 7.2, respectively.

1.1.1 Organization Background

The Puget Sound Regional Council (PSRC) develops policies and coordinates decisions about regional growth, transportation and economic development planning within King, Kitsap, Pierce and Snohomish counties. PSRC is composed of nearly 100 members, including the four counties, cities and towns, ports, state and local transportation agencies and Tribal governments within the region. PSRC is a Metropolitan Planning Organization that has been operating in its current form since 1991 when an interlocal agreement was signed between the numerous partners.

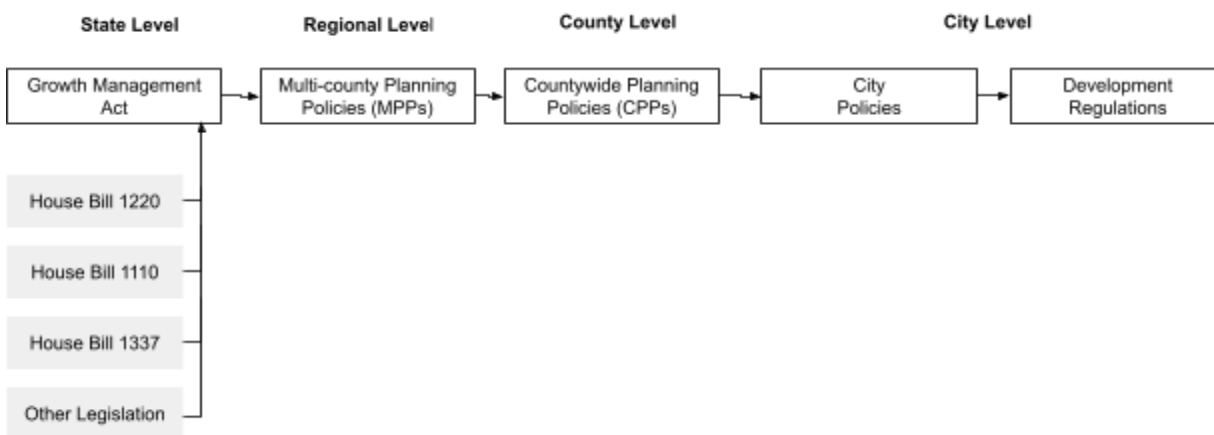
1.1.2 Comprehensive Planning

Figure 1 visualizes comprehensive plans within Washington State's planning framework. The Municipal Research and Services Center describes comprehensive plans as the "centerpiece of local planning efforts."¹ More technically, Washington State law defines a comprehensive plan as a "a generalized

¹ Municipal Research and Services Center, (n.d.). "Comprehensive Planning."
<https://mrsc.org/explore-topics/planning/gma/comprehensive-planning>

coordinated land use policy statement of the governing body of a county or city that is adopted” as a requirement of the Growth Management Act (GMA).²

Figure 1. Washington State planning framework.



Comprehensive plans are updated every ten years, with some municipalities choosing to review their plans annually. These revisions are necessary to ensure compliance with changes in state law, updated population or employment projections, zoning changes, and new community priorities.

This analysis focuses on the housing element of municipal comprehensive plans. However, counties also adopt comprehensive plans, and comprehensive plans expand beyond housing. All comprehensive plans must include elements on land use, capital facilities, utilities, transportation, and climate change. They may also include elements on rural development, economic development, ports, conservation, parks, and recreation. Some cities choose to include regional subarea plans to address specific neighborhood issues.³ In 2021, the Washington State Legislature passed HB 1220, which directs all municipalities planning under the GMA to develop a comprehensive plan that addresses racially disparate impacts, displacement, and exclusion in housing.⁴ By requiring municipalities to explicitly address issues of racial inequity, displacement, and exclusion in their housing plans, the law aims to ensure that future growth benefits all communities, especially those that have been marginalized in the past. It sets the stage for a more just and inclusive approach to urban planning and housing development in Washington State. The relevant changes to state law created by HB 1220 are outlined in **Appendix B**.

1.1.3 The Growth Management Act

In 1990, Washington State adopted the Growth Management Act, a series of statutes designed to address rapid population growth throughout the state. Currently, 18 counties are required to plan under the GMA, while 10 counties choose to plan under the GMA, and 11 counties are only subject to environmental requirements.⁵ The Growth Management Act requires that these counties utilize population projections from the Office of Financial Management to designate Urban Growth Areas, where all urban

² RCW 36.70A.030(8)

³ Municipal Research and Services Center, “Comprehensive Planning.” n.d.
<https://mrsc.org/explore-topics/planning/gma/comprehensive-planning>

⁴ RCW 36.70A.070(2)(e-f)

⁵ Municipal Research and Services Center, “Growth Management Act Basics.” (n.d.)
<https://mrsc.org/explore-topics/planning/gma/growth-management-act-basics>

growth and development should occur. All four counties in the Puget Sound Region are required to plan under the Growth Management Act.⁶

1.1.4 Additional Context on Housing Governance

In 2019, the Washington State Legislature passed HB 1923, which encouraged cities planning under the GMA to adopt Housing Action Plans (HAPs) to facilitate housing construction. Housing Action Plans (HAPs) share similarities with comprehensive plans, and several planners the authors spoke with noted that having a HAP in place made it easier to meet the HB 1220 requirements for comprehensive planning. However, the scope of this analysis is limited to HB 1220 and comprehensive plans, and does not extend to HAPs. In Chapter 3.7, the authors discuss the impact of this limited scope on the research findings.

Additional housing legislation has passed since HB 1220 was instated in 2021. 2023 was referred to as the “Year of Housing” in the state legislature due to the record number of housing-related bills introduced during the legislative session. Notable passed legislation includes HB 1110, which increased the maximum allowed density in residential neighborhoods throughout the state to allow for middle-density housing; HB 1337, which eases barriers to constructing accessory dwelling units (ADUs); and HB 1491, which requires that cities allow multi-family housing near transit. These and other legislation also impact comprehensive plans but are outside the scope of this analysis on HB 1220. The authors acknowledge the impact of implementing an inundation of housing policy amidst implementing HB 1220 at the same time. In interviewing city planners, the authors were able to gather valuable information on how municipalities responded to HB 1220 in the context of increasingly frequent state mandates that impact municipal planning.

1.1 Project Overview Summary

- In 2021, the Washington State Legislature passed **HB 1220**, which requires cities to **address racially disparate impacts, exclusion, and displacement** in their comprehensive plans.
 - **Comprehensive plans** are required under the **Growth Management Act**. They are “the centerpiece of local planning efforts.”
 - Additional legislation impacts how cities develop their comprehensive plans by setting statewide requirements related to density, parking, transportation, housing, etc.
- HB 1220 is a first-in-the-nation, historic, and innovative **step towards equitable, inclusive, and stabilizing housing policy** for all people who call Washington home.
- This report analyzes **how cities implement HB 1220** and **develops recommendations for future municipal housing policy**.
 - It was commissioned by the Puget Sound Regional Council, an organization that assists municipalities in King, Kitsap, Pierce, and Snohomish counties with their planning and development work.

⁶ A technicality in state law surrounding municipal incorporation means that areas must incorporate as cities, and no new towns can be incorporated. There are very few towns in Washington, and all municipalities selected for this analysis are cities. As such, municipality and city are used interchangeably throughout this paper.

1.2 Project Summary

The authors conducted a comparative analysis of nine comprehensive plans from municipalities across the Puget Sound Region, selected in consultation with the Puget Sound Regional Council. These municipalities represent a range of population sizes, demographics, displacement risks, and counties. The selected municipalities include Kent, Kirkland, and Tukwila (King County); Port Orchard (Kitsap County); Lakewood, University Place, and Tacoma (Pierce County); and Marysville and Lynnwood (Snohomish County).⁷ The selection process is further detailed in Chapter 4.

These plans, developed in compliance with HB 1220, have been assessed to identify patterns among local policies for addressing residential displacement. The findings will inform policy-making recommendations at PSRC and support governments across the region to address residential displacement, exclusion, and racially disparate impacts. To carry out this analysis, the team created a literature review, examined how HB 1220 has been included in various comprehensive plans across the region, and interviewed local government staff directly involved in the development and implementation of these plans.

1.3 Research Question

Based on the initial meeting with the project client, Puget Sound Regional Council, and the initial review of HB 1220, the authors drafted the below research questions to guide the development of this comparative analysis:

- What are the best strategies and policies for addressing residential displacement, exclusion, and racially disparate impacts in the Puget Sound region, based on the requirements stipulated by HB 1220?
 - How do strategies for addressing residential displacement, exclusion, and racially disparate impacts differ across municipalities with varying population sizes and displacement risks?
 - To what extent have local governments involved affected communities in the development of their comprehensive plan?
 - How do the comprehensive plans address the unequal impacts of residential displacement and exclusion on historically marginalized communities?

1.4 Key Findings

What are the best strategies and policies for addressing residential displacement, exclusion, and racially disparate impacts in the Puget Sound region, based on the requirements stipulated by HB 1220?

As recognized by HB 1220, comprehensive plans have the potential to address racially disparate impacts, displacement, and exclusion through policymaking. The plans are an important tool for creating equitable communities, and the full impact of these plans is an important area for future research. HB 1220 is the

⁷ Bainbridge Island was also selected initially, but it became apparent that their comprehensive plan was not available for evaluation. See Chapter 4 for more information.

first legislation of its kind, and governments nationwide are likely curious about its impact and effectiveness. Comprehensive plans impacted by HB 1220 were adopted very recently, between December 2024 and February 2025, making it too early to assess the impact of implementation. As such, the authors could not assess which portions of the comprehensive plans contained “best strategies and policies” with regard to outcomes.

However, the authors were able to analyze policies based on their level of accountability, directiveness, and expected actions and outcomes. Policies that are written to be accountable, directive, and with a clear action or outcome are more likely to have an impact. In addition to being well-written, the “best” policies must also be supported by evidence that suggests they will effectively address and begin to undo racially disparate impacts, displacement, and exclusion.

The authors also assessed the process of drafting comprehensive plans with help of semi-structured interviews with city planners, as well as the differing policies that selected municipalities decided to publish to align with HB 1220. Cities that utilized nontraditional targeted community engagement strategies for getting feedback on their comprehensive plans, particularly from historically marginalized communities, had more directive, action-oriented, and detailed policies for addressing displacement, RDI, and exclusion. Centering people in the planning process also reflects that housing policy is designed to serve the people who will live, work, and thrive in the homes and communities that these policies shape.

Through this assessment and analysis, the authors highlighted particular aspects of cities’ public engagement plans for drafting culturally responsive comprehensive plans and cities’ HB 1220 policies that stood out among their peers.

How do strategies for addressing residential displacement, exclusion, and racially disparate impacts differ across municipalities with varying population sizes and displacement risks?

The level of accountability, orientation, level of detail, and alignment with HB 1220 varies widely throughout cities and policy areas. However, few overarching patterns in variation were apparent based on level differences in population, racial/ethnic diversity, or displacement risk. Therefore, a city’s size, racial/ethnic makeup, and displacement risk are not the only factors that inform how cities address racially disparate impacts, displacement, and exclusion.

To what extent have local governments involved affected communities in the development of their comprehensive plan?

Due to the varying population sizes of the cities that the authors analyzed and interviewed, the capacities for local governments to engage in meaningful community engagement varied widely as well. Some local governments engaged their constituents in traditional ways seen across the majority of planning departments around the country, but some municipalities went above and beyond to creatively and competently engage all communities in comprehensive plan development, particularly those historically undervoice such as youth, seniors, and communities of color. Cities who had well-written policies that addressed RDI, exclusion, and displacement engaged with undervoice citizens in nontraditional ways and by forming strategic partnerships, demonstrating a growth mindset, and reinforcing connection through repeated touches.

How do the comprehensive plans address the unequal impacts of residential displacement and exclusion on historically marginalized communities?

The authors found that the policies which addressed displacement and exclusion affecting historically marginalized communities fall under three categories:

1. **People** policies centered and protected people through policies that explicitly addressed RDI and exclusion or increased tenant protection, emergency housing, emergency shelters, or homeownership rates.
2. **Production** policies focused on increasing housing for all income levels, lowering regulatory barriers, and alternatives to traditional single-family housing.
3. **Preservation** policies aimed to protect current housing from natural market increases to allow residents to remain and age in-place, as well as provide more opportunities for lower-income homebuyers and renters.

Additionally, these policies were informed by the voices of the historically marginalized communities. Targeted and culturally responsive community engagement done by municipalities informed and shaped directive, action-oriented, and detailed policies that addressed the relevant and salient unequal impacts of residential displacement and exclusion on historically marginalized communities.

1.4 Key Findings Summary

- **Nontraditional targeted community engagement** inform municipalities to write policies with directive, actionable, and detailed language can address and undo displacement, RDI, and exclusion
- Population size, racial/ethnic diversity, and displacement risk level do not appear to explain variation in policies and their framing across cities.
- Policies that address and undo displacement, RDI, and exclusion fall under three categories:
 - **People**
 - **Production**
 - **Preservation**

Chapter 2: Literature Review

2.1 Overview

Housing policies play a critical role in shaping equitable and inclusive communities. However, historical and contemporary planning decisions have contributed to racially disparate impacts, displacement, and exclusion, exacerbating housing inequities. By examining existing literature and case studies from other municipalities, this research highlights key policy approaches that mitigate displacement, promote housing accessibility, and foster long-term community stability.

Racially disparate impacts, displacement, and exclusion are interrelated, yet distinct, barriers to housing. This literature review utilizes academic and grey literature to contextualize municipalities' efforts to address these housing barriers and identifies the existing work guiding equitable municipal housing policy.

2.2 Barriers to Housing: RDI, Displacement, and Exclusion

Racially disparate impacts occur when policies, laws, or other systems disproportionately impact one or more racial groups. People of color are significantly less likely to own homes and are significantly more likely to live in neighborhoods with higher poverty rates and less economic opportunity.⁸ There is a significant body of work documenting the history of racially disparate housing policy in the Puget Sound Region.⁹ This history is summarized below, in section 2.3. PSRC's Racial Residential Segregation tools also identify how regional policies and practices have shaped racial settlement patterns, housing segregation, and opportunity access.¹⁰

Displacement is a pattern of change in which residents are forced to relocate due to socioeconomic or environmental pressure. There are multiple types of displacement, such as direct economic displacement, indirect economic displacement, cultural displacement, and physical displacement.¹¹ Gentrification is often used as a proxy for displacement, as it is closely related and more measurable. Displacement is a negative consequence of gentrification,¹² and displaced people are disproportionately low-income and/or racial and ethnic minorities.¹³ Additional displacement risk indicators were used to develop PSRC's Displacement Risk Map, which provides an index of displacement risk for all census tracts in the region.¹⁴

Exclusion occurs when certain populations are prevented from accessing housing within a specified area, either intentionally or unintentionally. Low-income people and/or people of color have historically been the targets of exclusionary housing policies. Exclusionary housing policies can be explicit, such as racially

⁸ Fenelon, A. (2024) Race, housing policy, and the demographic and spatial structure of modern housing programs: Who receives rental assistance and where do they live?, *Journal of Urban Affairs*, 46:5, 944-961, DOI: 10.1080/07352166.2022.2103426

⁹ National Fair Housing Alliance. (2024). Washington State Covenant Homeownership Program Study. https://app.leg.wa.gov/ReportsToTheLegislature/Home/GetPDF?fileName=WSHFCWACHPFULLSTUDY32024_c2f3176c-4e3d-47a3-836e-4e0a042272a9.pdf

¹⁰ Puget Sound Regional Council (n.d.) Racial Residential Segregation.

<https://www.psrc.org/our-work/racial-residential-segregation>

¹¹ Boado, J., Cook, C., Johnson, K., Matendo, O. (2024). Anti-Displacement Strategies. University of Washington Evans School of Public Policy Capstone Lab.

¹² Preis, B., Janakiraman, A., Bob, A., & Steil, J. (2021). Mapping gentrification and displacement pressure: An exploration of four distinct methodologies. *Urban Studies*, 58(2), 405-424. <https://doi.org/10.1177/0042098020903011>

¹³ Serrano, N., Realmuto, L., Graff, K. A., Hirsch, J. A., Andress, L., Sami, M., ... & Devlin, H. M. (2023). Healthy community design, anti-displacement, and equity strategies in the USA: a scoping review. *Journal of Urban Health*, 100(1), 151-180.

¹⁴ Puget Sound Regional Council (n.d.) Displacement Risk Mapping. <https://www.psrc.org/our-work/displacement-risk-mapping>

restrictive covenants, or implicit, such as zoning laws which prevent the development of multi-family housing.¹⁵

2.3 History of Racialized Housing Policy in the Puget Sound Region

For generations, housing policy in the Puget Sound Region has resulted in displacement, exclusion, and racially disparate impacts. Recognizing this history is essential for contextualizing the region's current housing challenges.

Prior to statehood, the territorial and federal government enacted policies that displaced Indigenous tribes and excluded Black people and other people of color. The Donation Land Claim Act of 1850 offered hundreds of acres of land to White settlers arriving in the Pacific Northwest. At the same time, it was against territorial law for Black people to enter or reside in the area.¹⁶

Land in Pierce, King, and Snohomish Counties was available for settlement because of the treaties of Medicine Creek, Point Elliot, and Point No Point. These treaties ceded millions of acres of tribal land to the territory in exchange for protected reservation land. While many people believe that these treaties were mutual agreements between governments, the reality is that Native Americans usually did not speak or read English and lacked meaningful power or agency in the negotiations.¹⁷ Some Tribal leaders' signatures are likely forged, and the land reserved for Native Americans was small and unlivable.¹⁸

Chinese and Japanese immigrants came to Washington in the mid-19th century in search of economic prosperity. They developed thriving communities in Washington's cities but were prohibited from owning land. Washington law stated that landowners must be eligible for citizenship, and federal law stated that Asian immigrants were not eligible for citizenship.¹⁹ Other laws, such as the federal Chinese Exclusion Act of 1882, and the state Alien Land Bill of 1921, further excluded Asian immigrants from owning or leasing land. Cities, including Tacoma and Seattle, forcibly displaced Asian immigrants from their homes.²⁰

In the 20th century, it became common for land developers to include language in property deeds that prohibited people of color from using the property. These policies, called racially restrictive covenants, created segregated neighborhoods. Housing options for people of color were limited to dense, lower-cost

¹⁵ Housing Affordability Institute. (2021). History of Exclusion in America's Housing Policies.

https://www.housingaffordabilityinstitute.org/wp-content/uploads/2024/05/Ex_Zoning_History_Print.pdf

¹⁶ National Fair Housing Alliance. (2024). Washington State Covenant Homeownership Program Study.

https://app.leg.wa.gov/ReportsToTheLegislature/Home/GetPDF?fileName=WSHFCWACHPFULLSTUDY32024_c2f3176c-4e3d-47a3-836e-4e0a042272a9.pdf

¹⁷ Puyallup Tribe of Indians. (2023) "Medicine Creek Treaty History." Accessed Feb 23, 2025.

https://www.youtube.com/watch?v=yLRI-ZJKJJE&ab_channel=PuyallupTribeofIndians

Kratz, Jessie. (2020). "The Birth of an Eternal Document: The Point Elliott Treaty." National Archives Blog.

<https://prologue.blogs.archives.gov/2020/09/28/the-birth-of-an-eternal-document-the-point-elliott-treaty/>

Wilkinson, C. (2023). Treaty Justice Treaty Justice: The Northwest Tribes, the Boldt Decision, and the Recognition of Fishing Rights. University of Washington Press.

¹⁸ Wilkinson, C. (2023). Treaty Justice Treaty Justice: The Northwest Tribes, the Boldt Decision, and the Recognition of Fishing Rights. University of Washington Press; Puyallup Tribe of Indians. (2023) "Medicine Creek Treaty History." Accessed Feb 23, 2025.

https://www.youtube.com/watch?v=yLRI-ZJKJJE&ab_channel=PuyallupTribeofIndians

¹⁹ Klingle, Mathew. (n.d). "A History Bursting With Telling: Asian Americans in Washington State - A Curriculum Project for Washington Schools." Accessed Feb 22, 2025.

<https://www.washington.edu/uwired/outreach/cspn/Website/Classroom%20Materials/Curriculum%20Packets/Asian%20Americans/Asian%20American%20Main.html>

²⁰ National Fair Housing Alliance. (2024). Washington State Covenant Homeownership Program Study.

https://app.leg.wa.gov/ReportsToTheLegislature/Home/GetPDF?fileName=WSHFCWACHPFULLSTUDY32024_c2f3176c-4e3d-47a3-836e-4e0a042272a9.pdf

areas, often with older housing and poor infrastructure.²¹ Municipal zoning laws further reinforced housing exclusion, as neighborhoods of color were more likely to be zoned as commercial or mixed-use than White neighborhoods.²² These zoning laws made it difficult for residents to improve their homes and discouraged investment in Black and Asian neighborhoods. Similarly, the federal government instituted redlining policies that deemed neighborhoods with high Black populations as “risky” investments, while encouraging investment in white and affluent areas.²³

Following the Fair Housing Act in 1968, the legacy of racist housing policies and zoning regulations continued to reinforce highly segregated residential patterns in U.S. metropolitan areas.²⁴ Bank lenders, following the creation of mortgage-backed securities in the 1980s, targeted these hyper segregated Black neighborhoods to sell Black families subprime mortgage loans.²⁵ When the housing market crashed in 2008, Black and Latino homeowners were disproportionately impacted.²⁶ Additionally, many neighborhoods across the US are experiencing the effects of gentrification, in which property values in areas that were historically disinvested in rise, resulting in higher rents. As rent increases, it reduces the supply of affordable housing, so existing residents, who are disproportionately BIPOC, are displaced.²⁷

Recently, municipalities across the Puget Sound Region have been working to mitigate racially disparate impacts through equity-driven approaches to housing policy. For example, the City of Redmond has provided relocation assistance to low and moderate-income households that may have been displaced by previous racialized zoning codes and enforcement.²⁸ In addition, to prevent further housing discrimination and allow for a variety of housing options, municipalities have changed the language in policies that state, “maintain the character of established single-family neighborhoods” to “maintain the scale and form of buildings in established residential neighborhoods.”²⁹

There has also been recent legislation to address racially disparate impacts at the state level. HB 1220’s mandate to “address and begin to undo racially disparate impacts, exclusion, and displacement” is one example. In 2024, Washington became the first state in the nation to offer down payment assistance to people who have experienced lasting impacts of redlining. The Covenant Homeownership Program provides down payment assistance to Black, Hispanic, Indigenous, Pacific Islander, Korean, and Indian homebuyers who had family in Washington prior to 1986. To qualify, applicants must be a first-time homebuyer and meet certain income requirements.³⁰

²¹ Gregory, James. “Understanding Racial Restrictive Covenants and their Legacy.” Racial Restrictive Covenants Project, Washington State. University of Washington. <https://depts.washington.edu/covenants/segregation.shtml>

²² Rothwell, J., & Massey, D. S. (2009). The Effect of Density Zoning on Racial Segregation in U.S. Urban Areas. *Urban Affairs Review*, 44(6), 779-806. <https://doi.org/10.1177/1078087409334163> (Original work published 2009)

²³ National Fair Housing Alliance. (2024). Washington State Covenant Homeownership Program Study. https://app.leg.wa.gov/ReportsToTheLegislature/Home/GetPDF?fileName=WSHFCWACHPFULLSTUDY32024_c2f3176c-4e3d-47a3-836e-4e0a042272a9.pdf

²⁴ Massey, D. S. (2020). Still the Linchpin: Segregation and Stratification in the USA. *Race and Social Problems*, 12(1), 1-12.

²⁵ Rugh, Jacob S., and Douglas S. Massey. “Racial segregation and the American foreclosure crisis.” *American Sociological Review* 75, no. 5 (2010): 629-651.

²⁶ Ibid.

²⁷ Richardson, Jason, Bruce Mitchell, and Juan Franco. “Shifting neighborhoods: Gentrification and cultural displacement in American cities.” Washington DC: National Community Reinvestment Center. (2019). <http://arks.princeton.edu/ark:/88435/dsp01hq37vr65q>

²⁸ Washington Department of Commerce. (2023, April 25). *Guidance to address racially disparate impacts*. <https://deptofcommerce.app.box.com/s/11217198jattb87qobtw63pkplzhxege>

²⁹ Ibid.

³⁰ Washington State Housing Finance Commission, “Covenant Homeownership Program.” <https://www.wshfc.org/covenant/>

2.4 Policy Implementation Outside the Region

Several municipalities outside the region have implemented land use and housing policy reforms to address exclusion, displacement, and racially disparate impacts.

In 2018, the Minneapolis City Council approved the Minneapolis 2040 Plan, which significantly changed the city's land use regulations.³¹ The plan eliminated single-family zoning citywide, allowing the construction of duplexes and triplexes on parcels previously restricted to single-family homes, comprising 70% of the city's residentially zoned land.³² This practice, called upzoning, is likely to reduce housing barriers by increasing the supply of varied housing types in all areas of a city. The Minneapolis 2040 plan is used throughout this paper as a comparison to comprehensive plans in the Puget Sound Region, as it was adopted only a few years prior to the passage of HB 1220.

Oregon's House Bill 2001, passed in 2019, imposed a statewide ban on exclusionary zoning on cities with populations over 10,000, allowing the construction of duplexes in lots previously zoned as single-family houses only. In addition, cities in the Portland Metropolitan region (and other cities with a population over 25,000) must allow the construction of duplexes, triplexes, fourplexes, cottage clusters, and townhouses in residential areas. Portland's Residential Infill Project, passed in 2020, built on the State's policies restructuring zoning laws to allow up to four housing units on lots previously limited to single-family homes, and up to six units if at least half the units are affordable housing, allowing in addition development without off-street parking.³³

Additionally, to address the risks of displacement caused by urban development, the Portland 2035 Comprehensive Plan includes strategies to protect communities exposed to displacement risk. The plan promotes the use of public investments and programs and nonprofit partnerships, to develop affordable housing to mitigate market pressures that lead to displacement. Additionally, land banking is identified as a key anti-displacement tool, encouraging collaboration with community organizations to reserve land for affordable housing and community development.³⁴ The authors use the Portland 2035 Comprehensive Plan as a comparator to the 2044 Puget Sound Comprehensive plans studied.

The City of Los Angeles' United to House LA (ULA) initiative, launched in 2023, provides a sustainable funding source for affordable housing and homelessness prevention. Funded by a special real estate transfer tax on property sales exceeding \$5 million, ULA allocates 70% to affordable housing, supporting the development, acquisition, and rehabilitation of affordable housing, alternative permanent housing models, and homeownership opportunities. In addition, 30% of the funds are allocated to homelessness prevention, supporting eviction defense and prevention, tenant outreach and education, protections from tenant harassment, short-term emergency funding for tenants facing housing loss, and income support for rent-burdened at-risk seniors and persons with disabilities.³⁵

³¹ City of Minneapolis (2018). The Minneapolis 2040 Plan. Community Planning and Economic Development. <https://minneapolis2040.com>

³² Kuhlmann, D. (2021). Upzoning and Single-Family Housing Prices: A (Very) Early Analysis of the Minneapolis 2040 Plan, *Journal of the American Planning Association*, 87:3, 383-395, DOI: 10.1080/01944363.2020.1852101

³³ City of Portland (2021). Residential Infill Project. An update to Portland's single-dwelling zoning rules. Bureau of Planning and Sustainability. <https://www.portland.gov/bps/planning/rip>

³⁴ City of Portland (2016). 2035 Comprehensive Plan. Bureau of Planning and Sustainability. <https://www.portland.gov/bps/comp-plan>

³⁵ City of Los Angeles (2023). United to House LA (ULA). Los Angeles Housing Department. <https://housing.lacity.gov/ula>

In addition, a review of California anti-displacement policies, summarized in **Table 1**, found that “neighborhood stabilization and tenant protection policies have the most direct and immediate effect on mitigating displacement.”³⁶ This broad review lays out a guideline on how to broadly categorize effective anti-displacement policies which inspired this analysis.

Table 1: Review of 17 anti-displacement strategies in California, California Air Resources Board (2021).

<i>Category</i>	<i>Policy Name</i>	<i>Literature Coverage Level</i>	<i>Potential to Prevent Displacement*</i>	<i>Market Type**</i>	<i>Implementation Scale</i>	<i>Timeframe to Prevent Displacement</i>
Production	Housing Production	HIGH	HIGH+	Strong	Local, State	Long-term
Production	Inclusionary Zoning + Developer Incentives	MEDIUM	MEDIUM	Strong	Local, State	Long-term
Production	Accessory Dwelling Units	LOW	MEDIUM	Neutral	Local, State	Long-term
Production	Impact + Linkage Fees	MEDIUM	LOW	Strong	Local	Long-term
Production	Housing Overlay Zones	LOW	MEDIUM	Strong	Neighborhood, Local	Long-term
Production	Land Value Recapture	LOW	LOW	Strong	Local, State	Long-term
Preservation	Unsubsidized Affordable Housing	LOW	HIGH	Neutral	Local, State	Short-term
Preservation	Federally-Funded Housing Developments	MEDIUM	MEDIUM	N/A	Local, Federal	Short-term
Preservation	Housing Rehabilitation	MEDIUM	LOW	N/A	Local, State, Federal	Short-term
Preservation	Condominium Conversion Restrictions + Tenant Opportunity to Purchase	MEDIUM	MEDIUM	Strong	Local	Short-term
Preservation	Community Control of Land	LOW	HIGH	Neutral	Neighborhood, Local	Short-term
Neighborhood Stabilization	Rent Control	HIGH	MEDIUM	Strong	Local, State	Short-term
Neighborhood Stabilization	Community Benefits Agreements	MEDIUM	LOW	Strong	Neighborhood, Local, State	Long-term
Neighborhood Stabilization	Rental Assistance Programs	MEDIUM	HIGH	Neutral	Local	Short-term
Neighborhood Stabilization	Foreclosure Assistance	MEDIUM	HIGH	Neutral	Local, State, Federal	Short-term
Neighborhood Stabilization	Tenant Right to Counsel	MEDIUM	HIGH	Strong	Local	Short-term
Neighborhood Stabilization	"Just Cause" Evictions	MEDIUM	HIGH	Strong	Local	Short-term

³⁶ Chapple, K., & Loukaitou-Sideris, A. (2021). White paper on anti-displacement strategy effectiveness. California Air Resources Board.
<https://www.urbandisplacement.org/wp-content/uploads/2021/08/19RD018-Anti-Displacement-Strategy-Effectiveness.pdf>

Some states attempt to address exclusionary zoning by implementing “fair share” policies, which require all municipalities to maintain a minimum level of affordable housing.³⁷ The oldest of these laws is Massachusetts' 40B. While 40B has effectively increased the share of affordable housing in some key neighborhoods, most Massachusetts municipalities do not meet the affordable housing threshold, with whiter and more affluent municipalities being the least likely to produce affordable housing.³⁸ Research on 40B processes may predict some challenges in HB 1220 implementation. For example, opposition to 40B developments is tightly linked to information asymmetry between existing residents, land developers, and municipal officials.³⁹ The same study notes that the affordable housing population is generally absent from 40B implementation processes, as is discussion surrounding race or economic inequality. Therefore, public participation often focuses on potential negative impacts of increased housing rather than potential benefits. As a result, municipalities tend to adopt fair share policies that meet minimum state requirements without making substantive progress toward neighborhood equity and inclusion.⁴⁰

2.5 Policy Strategies

Municipalities invest in neighborhood development to improve social and economic outcomes or respond to population increases and infrastructure needs. However, these investments can also increase the risk of displacement, deepen existing exclusion, and disproportionately affect certain racial groups.⁴¹ Therefore, municipalities must intentionally design development policies to be inclusive, stabilizing, and racially conscious.

Several themes emerged that drive equitable housing policy, such as preservation, protection, revenue generation, property acquisition, stabilization, and community engagement.⁴² These themes support policies such as Tenant Opportunity to Purchase; Right of First Refusal; preservation ordinances; housing preservation funds; and community prioritization.⁴³ The Washington Department of Commerce provides Puget Sound municipalities with guidance to update housing elements and address racially disparate impacts through a 5-step process shown in **Figure 1**. This guide focuses on revising policy through increasing and preserving affordable housing, ensuring equitable distribution of the benefits of housing investment and development, and clarifying the language of existing policies.⁴⁴

³⁷ Sportiche, N., Blanco, H., Daepp, M. I. G., Graves, E., & Cutler, D. (2024). Can Fair Share Policies Expand Neighborhood Choice? Evidence From Bypassing Exclusionary Zoning Under Massachusetts Chapter 40B. *Housing Policy Debate*, 1–33. <https://doi.org/10.1080/10511482.2024.2320131>

³⁸ Girouard, J. (2023). Getting Suburbs to Do Their Fair Share: Housing Exclusion and Local Response to State Interventions. *RSF: Russell Sage Foundation Journal of the Social Sciences*, 9(1), 126–144. <https://doi.org/10.7758/RSF.2023.9.1.06>

³⁹ Ibid.

⁴⁰ Whittemore, A. H., & BenDor, T. K. (2019). Opposition to housing development in a suburban US County: Characteristics, origins, and consequences. *Land Use Policy*, 88, 104158-. <https://doi.org/10.1016/j.landusepol.2019.104158>

⁴¹ Serrano, N., Realmuto, L., Graff, K. A., Hirsch, J. A., Andress, L., Sami, M., ... & Devlin, H. M. (2023). Healthy community design, anti-displacement, and equity strategies in the USA: a scoping review. *Journal of Urban Health*, 100(1), 151-180.

⁴² Ibid; Been, V. (2017). What more do we need to know about how to prevent and mitigate displacement of low-and moderate-income households from gentrifying neighborhoods. *A Shared Future: Fostering Communities of Inclusion in an Era of Inequality*. Cambridge, MA: Joint Center for Housing Studies. https://www.jchs.harvard.edu/sites/default/files/media/imp/a_shared_future_what_more_do_we_need_to_know_0.pdf ;

⁴³ Boado, J., Cook, C., Johnson, K., Matendo, O. (2024). Anti-Displacement Strategies. University of Washington Evans School of Public Policy & Governance, Student Consulting Lab.

⁴⁴ Washington Department of Commerce. (2023, August 23). *Guidance for updating your housing element*. <https://deptofcommerce.app.box.com/s/1d9d517g509r389f0mjpowh8isjpirh>

Figure 1: Process for assessing racially disparate impacts, Washington State Department of Commerce.



2.6 Conclusion

Much of the existing literature on anti-displacement policies wrongly presumes that policies benefit all communities equally.⁴⁵ Racially disparate impact analyses are therefore an important tool for evaluating the impact of housing policy, particularly given that housing policy has a history of perpetuating RDI, exclusion, and displacement. Municipalities within the Puget Sound Region, and across the United States, are working to ameliorate these issues through housing policy that focuses on stabilization, preservation, revenue generation, protection, property acquisition, and community engagement.

Chapter 2 Summary

- **Racially Disparate Impacts, Displacement, and Exclusion** create barriers to housing.
- **Historically the Puget Sound Region’s housing policies have perpetuated RDI, exclusion, and displacement by:**
 - Displacing Indigenous tribes from their homes to colonize the region.
 - Excluding Chinese and Japanese immigrants from homeownership,
 - Creating racial covenants in the deeds of homes to prevent BIPOC from living there.
 - Gentrifying historically BIPOC neighborhoods, displacing communities of color.
- **Other cities, outside the Puget Sound, have implemented evidence-based strategies to address barriers to housing. For example:**
 - Minneapolis **banned single family zoning** to address and undo exclusion.
 - Oregon **banned exclusionary zoning** in cities with over 10,000 people.
 - Los Angeles **implemented a special real estate transfer tax on property. sales** exceeding \$5 million to fund the production of affordable housing units.
- The authors determined the **following evidence-based strategies in the literature that create more equitable housing policy:**
 - Preservation
 - Protection
 - Revenue Generation
 - Property Acquisition
 - Stabilization
 - Community Engagement

⁴⁵ Chapple, K., & Loukaitou-Sideris, A. (2021). White paper on anti-displacement strategy effectiveness. *California Air Resources Board*.
<https://www.urbandisplacement.org/wp-content/uploads/2021/08/19RD018-Anti-Displacement-Strategy-Effectiveness.pdf>

Chapter 3: Research Methods

The chapter includes an overview of the sampling, data collection, and analysis techniques used to answer the stated research questions:

What are the best strategies and policies for addressing residential displacement, exclusion, and racially disparate impacts in the Puget Sound region, based on the requirements stipulated by HB 1220?

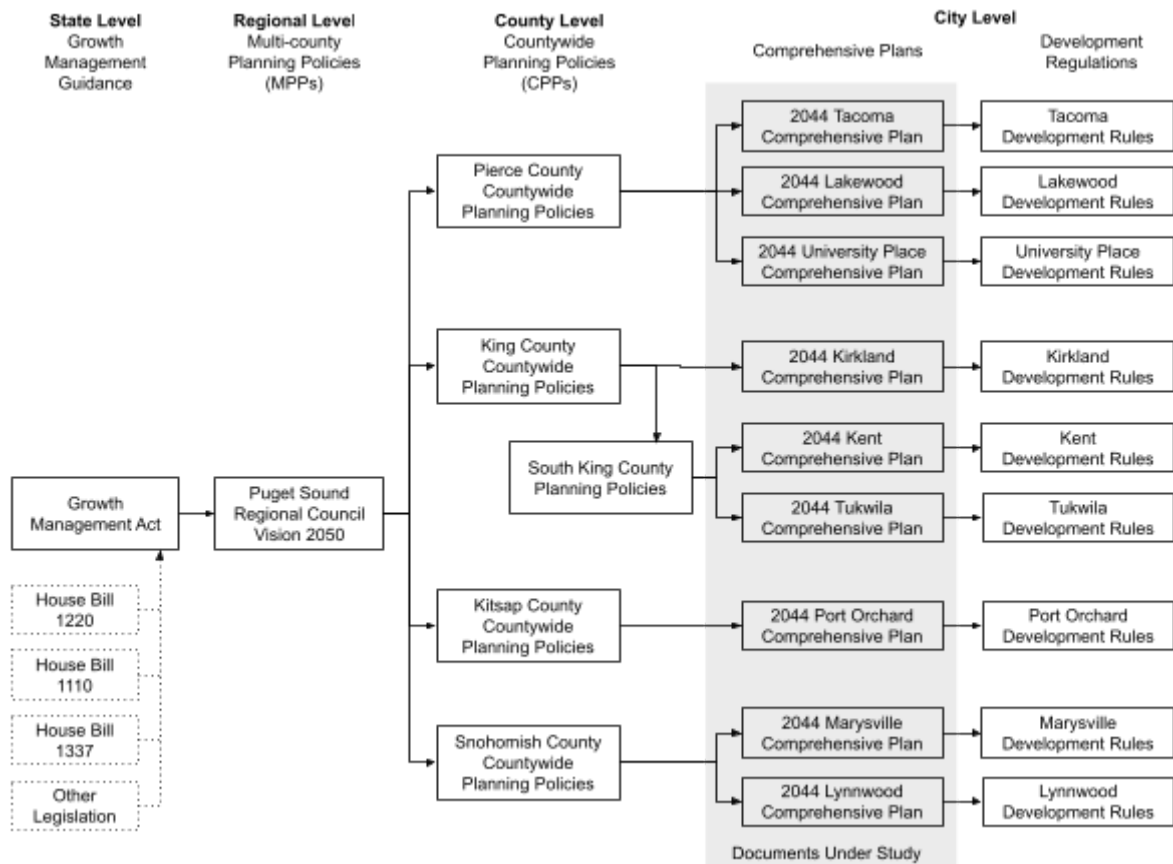
- How do strategies for addressing residential displacement, exclusion, and racially disparate impacts differ across municipalities with varying population sizes and displacement risks?
- To what extent have local governments involved affected communities in the development of their comprehensive plan?
- How do the comprehensive plans address the unequal impacts of residential displacement and exclusion on historically marginalized communities?

The chapter is broken into seven sections. Sections one to three describe the methodology used to identify and collect necessary data. The following three sections detail the types of analysis used to review the data sources. Finally, the chapter concludes by summarizing limitations of the research methods.

3.1 Overview

The authors selected ten cities in the Puget Sound Region, and five cities outside of the Puget Sound Region, using a mixed methods approach. Primarily, the authors conducted a comparative case study analysis using nine cities' comprehensive plans, from the Puget Sound region in Washington State, as case studies to understand the processes the cities used to develop their comprehensive plans and the resulting policies that addressed HB 1220 requirements. These policies are informed by state, regional, and county planning policies as seen in **Figure 1**. Additionally, the authors conducted ten semi-structured interviews with city planners from each of the selected cities to supplement information regarding the processes for incorporating HB 1220 requirements into their respective plans and any recommendations they had for other cities. Finally, the authors reviewed five cities' plans outside of the region that used thoughtful innovative policies that cities within Puget Sound could potentially implement.

Figure 1. Washington State planning framework and documents under study for selected municipalities.



3.2 Comparative Case Study Approach

Purposive sampling was used for selecting cities inside and outside of the Puget Sound Region.⁴⁶ Cities in the Puget Sound were selected for analysis based on the following criteria: availability of comprehensive plans; variation in racial and ethnic diversity; variation in population size; variation in displacement risk levels; representation from all four counties; and client priorities (**Table 1**). The authors intended to analyze ten plans, but later limited the analysis to nine plans after it became clear one plan would not be available within the time constraints of the contract period.

3.2.1 Sampling Strategy for the Puget Sound Region

The criteria used to identify the selection of comprehensive plans to analyze are defined as:

⁴⁶ Tongco, Maria Dolores C. "Purposive sampling as a tool for informant selection." (2007).

1. Plan Availability: Each city in the Puget Sound Region was expected to incorporate the HB 1220 mandate into their 2024-2044 comprehensive plans by December 31, 2024, with respective city councils passing them by June 30, 2025.⁴⁷ While some cities completed and passed their comprehensive plans ahead of the deadline, other cities are still finalizing their drafts. This limited the scope of available finalized comprehensive plans to analyze during the project period of January 2025 - May 2025.
2. Racial and Ethnic Diversity: HB 1220 requires cities to conduct a racially disparate impact analysis and identify strategies for mitigating these impacts within their comprehensive plans. As such, it was important to include cities with varying levels of racial and ethnic diversity to identify how cities' racial and ethnic demographic compositions informed their approach for addressing RDI.⁴⁸ Using PSRC's Community Profile Data, cities with varying distributions of racial and ethnic diversity were chosen, with some cities having a majority Black, Indigenous, or People of Color, other cities majority white.⁴⁹
3. Population Size: Cities in the Puget Sound Region vary significantly in population size and growth, ranging from the smallest city with 200 residents to the largest with 755,000.⁵⁰ To be representative of the region, a mix of small (<25,000), medium (25,000-80,000), and large (>80,000+) cities in the region using PSRC's Community Profile Data.
4. Displacement Risk: HB 1220 mandates that cities identify areas at higher risk of displacement and establish anti-displacement policies. Selected cities have different displacement risk levels, based on PSRC's displacement risk map. Cities were categorized as having lower, lower, moderate, moderate-higher, and higher risk of displacement based on displacement risk faced by the majority of the population'. Lower risk are cities whose majority population face lower risk for displacement, moderate risk are cities whose majority population faces moderate risk of displacement, moderate-higher risk are cities whose population displacement risks are split between moderate and higher risk, and finally higher risk are cities whose majority population face a higher risk of displacement, as seen in **Table 1**.
5. County Representation: The Puget Sound Regional Council represents municipalities in King, Kitsap, Pierce and Snohomish counties. The authors selected cities from each region. To reflect differences in population sizes and the number of cities in each county, the authors selected three cities each in King and Pierce counties, and two cities each in Kitsap and Snohomish counties (**Figure 2**).
6. Client Priorities: The authors proposed several cities to the Puget Sound Regional Council, who provided feedback and made further recommendations. The final selection reflects PSRC's organizational discretion and the above criteria.

⁴⁷ MSRC. Comprehensive Planning. Retrieved from

[https://mrsc.org/explore-topics/planning/gma/comprehensive-planning#:~:text=Local%20governments%20must%20also%20include,update%20cycle%20\(SSB%205834\).](https://mrsc.org/explore-topics/planning/gma/comprehensive-planning#:~:text=Local%20governments%20must%20also%20include,update%20cycle%20(SSB%205834).) (2025, February 23).

⁴⁸ Wash. Legis. Assemb. HB 1220. Reg. Sess. 2021-2022 (2021). <https://app.leg.wa.gov/bills/summary?Year=2021&BillNumber=1220>

⁴⁹ *Community profiles*. PSRC Community Profiles. (n.d.). <https://psrcwa.shinyapps.io/community-profiles/>

⁵⁰ US Census (2025, February 25). *Quick Facts Seattle, Washington*. Retrieved from <https://www.census.gov/quickfacts/fact/table/seattlecitywashington/PST045224>

3.2.2 Selected Cities and Their Unique Characteristics

Based on the above criteria, US Census data and PSRC's Displacement Risk and Community Profile data were used to select the following cities: **Bainbridge Island, Kent, Kirkland, Lakewood, Lynnwood, Marysville, Port Orchard, Tacoma, Tukwila, and University Place.**⁵¹

Table 1. Characteristics of the selected municipalities from PSRC Community Profiles Dashboard.

City	County	Population ⁵²	Displacement Risk ⁵³	Racial/Ethnic Diversity ⁵⁴	Date Comprehensive Plan Passed
Bainbridge Island	Kitsap	Low (24,900)	Lower	Low (11.8%)	TBD*
Kent	King	High (130,000)	Moderate-Higher	High (59%)	December 5, 2024
Kirkland	King	High (91,100)	Lower	Low (31%)	December 10, 2024
Lakewood	Pierce	Medium (60,600)	Moderate-Higher	High (52%)	September 16, 2024
Lynnwood	Snohomish	Medium (38,500)	Moderate	Medium (46%)	January 27, 2025
Marysville	Snohomish	Medium (69,600)	Lower	Low (28%)	December 9, 2024
Port Orchard	Kitsap	Low (14,300)	Moderate	Medium (33%)	December 18, 2024
Tacoma	Pierce	High (215,800)	Moderate	Medium (42%)	June 2025**
Tukwila	King	Low (20,300)	Higher	High (72%)	December 16, 2024
University Place	Pierce	Medium (33,700)	Lower	Medium (34%)	December 6, 2024
<p>* Bainbridge Island has not completed writing its' comprehensive plan. The analysis of their plan is primarily on the processes they are using to develop their plan.</p> <p>**Tacoma's comprehensive plan has been completed but not passed by the city council as of May 2025.</p>					

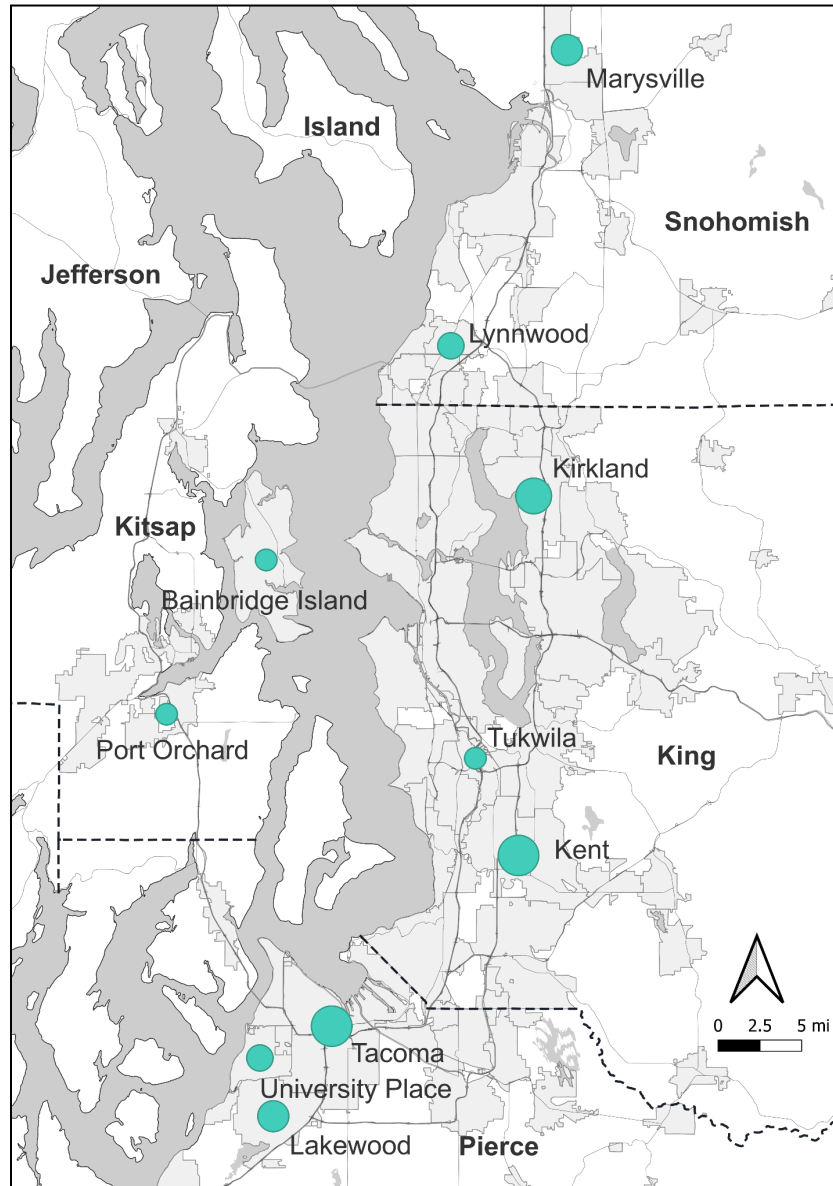
⁵¹ *Community profiles.* PSRC Community Profiles. (n.d.). <https://psrcwa.shinyapps.io/community-profiles/>

⁵² Low represents under 30,000, Medium represents 30,000-80,000, High represents above 80,000

⁵³ Percentages listed represent the percentage of residents with the respective Displacement Risk category. Moderate-Higher shows the aggregate between the Moderate and Higher risk categories due to having similar percentages.

⁵⁴ Low represents under 33%, Medium represents at least 33%, and High represents at least 50%

Figure 2. Location of the selected municipalities within the Puget Sound Region.



3.2.3 Analyzing the Comprehensive Plans

Each completed comprehensive plan was reviewed in its entirety, but the analysis focused primarily on the plan's incorporation of HB 1220's mandate to address displacement, RDI, and exclusion within its land-use and housing elements. The authors developed a codebook based on the subsections within the comprehensive plans related to HB 1220 to document which sections were included or excluded from each plan, as a basis for conducting a robust content analysis. Additionally, a comparative analysis was conducted between cities' comprehensive plans to determine similarities, differences, and innovative approaches cities used to comply with HB 1220.

3.3 Semi-Structured Interviews

To ensure that the sample of interview participants represented all ten cities and relevant subject matter expertise, a purposive sampling technique was used for selecting interview participants, with assistance from PSRC.⁵⁵ The authors conducted ten interviews with city planners, who led the development of their comprehensive plans. The interviews provided additional context regarding cities' process incorporating HB 1220 requirements.⁵⁶

3.3.1 Strategy for Conducting Semi-Structured Interviews

PSRC introduced the authors to city planners from each municipality. Then, the authors conducted ten semi-structured interviews—one interview for each city—over Zoom, recording the audio as well as taking notes of each planner's responses. Questions focused on each city's processes for incorporating the HB 1220 mandates related to displacement, racially disparate impacts, and exclusion and recommendations they had for other cities. The full list of questions asked can be found in **Appendix A**.

3.3.2 Strategy for Analyzing Semi-Structured Interviews

The authors reviewed each interview by identifying and summarizing themes that arose, without creating a code book with predefined categories in advance.⁵⁷ Additionally, interview participants' recommendations were considered when writing the recommendations for this report.

3.4 Cities Outside of the Puget Sound Region

Five additional comprehensive plans from municipalities outside of the Puget Sound were selected to analyze based on initial findings from the literature review. The literature on evidence-based practices for addressing displacement, RDI, and exclusion referenced housing policy practices in Portland and Minneapolis. Additionally, two cities which have recently won planning awards, such as the National American Planning Association Daniel Burnham Award for a Comprehensive Plan and the American Planning Association's Comprehensive Plan Award, were selected: Worcester and Newark. Finally, research from Massachusetts and California provided additional context on housing policy outside of the Puget Sound. The authors chose to include cities from other regions to provide additional context for the analysis and to meet the project needs identified by PSRC.

3.5 Analysis: Comprehensive Plan Development Process

This section examines the processes involved in developing comprehensive plans in the different municipalities by analyzing three dimensions: public engagement, HB 1220 alignment, resources, and organization (**Table 2**) to highlight best practices. The results of this analysis are found in Chapter 4.

⁵⁵ Tongco, Maria Dolores C. "Purposive sampling as a tool for informant selection." (2007).

⁵⁶ The University of Washington Human Subjects Division (HSD) reviewed this study (IRB ID STUDY00022461) and determined that it was human subjects research that qualified for exempt status (Category 2ii).

⁵⁷ Riger, Stephanie, & Sigurvinsdottir, Rannvieg. Thematic analysis. *Handbook of methodological approaches to community-based research: Qualitative, quantitative, and mixed methods*, 33-41. (2016).

Table 2. Comparison of processes for developing the comprehensive plans matrix.

Category	Dimensions	Sub Dimension	Criteria
Process	Public Engagement	Community Input	Did the city engage the community to mitigate displacement, racially disparate impacts, and exclusion?
		Culturally-Competent Education and Access	Did the city include policies or strategies to provide culturally-competent education and access to housing resources?
	HB 1220 Policy Alignment	Housing Inventory Analysis	Did the city conduct a housing inventory analysis by income level to plan for current and future housing needs affordable at all income levels?
		Updating Existing Policies	Did the city review its policies in its current comprehensive plan to remove and/or update policies that perpetuate exclusion, RDI, and displacement?
		RDI Analysis	Did the city conduct an RDI analysis?
		Anti-Displacement Strategies	Did the city develop anti-displacement strategies?
		Funding and Regulatory Gaps and Barriers	Did the city acknowledge any funding and/or regulatory gaps or barriers preventing them from addressing RDI, displacement, or exclusion?
	Organization	Accessibility	Is the city's comprehensive plan written in accessible plain language?
		Organizational Structure	Is the city's comprehensive plan organized in a clear way?
		Clarity and Visuals	Does the city's comprehensive plan include clear and helpful visuals?
		Integration and Coherence	Does the city's comprehensive plan flow logically between and within sections?
	Resources	Data Sources	What data did the city use to inform the development of its land use and housing policies?
		Consultancy Resources	Did the city use a consulting firm to help develop its comprehensive plan?
		Financial Resources	Did the city use other financial resources, other than its city budget, to fund the development of their comprehensive plan?
		Informational Resources	What informational resources did the city use to inform the development of its comprehensive plan?

3.5.1 Public Engagement

This dimension focuses on the methods each municipality used to engage the public and gather feedback from residents, community organizations, and other stakeholders during the comprehensive plans drafting processes. It assesses to what extent, and through which strategies, community input was integrated into

the final documents. Further, the authors reviewed whether or not cities included culturally-competent education and housing resources, such as those described below, to meet the diverse needs of community members.

3.5.2 Resources

This dimension is evaluated through four sub-dimensions: the data, consultants, funding, and information sources that informed the comprehensive plan drafting process. In addition, it delineates whether cities conducted their own analysis based on the data available and how these assessments influenced policy development.

3.5.3 HB 1220 Policy Alignment

This dimension focuses on to what extent cities addressed the main components of HB 1220: planning for affordable housing at all income levels, updating existing policies that perpetuate exclusion and RDI, conducting an RDI analysis, creating anti-displacement strategies, and noting funding and/or regulatory barriers to addressing these issues. Additionally, this dimension examines how cities addressed each of these components.

3.5.4 Organization

This dimension assesses the accessibility, organization, readability, and coherence of the comprehensive plan which can greatly affect the reach of the policies. An effectively organized comprehensive plan can help in mitigating racially disparate impacts by making it more accessible to all residents.

3.6 Analysis: Comprehensive Plan Policies

The section outlines the strategies used to analyze the extent that comprehensive plan policies address HB 1220 mandates. The authors considered the policy classification and the policy language to develop the analysis in Chapter 5. **Table 3** provides an overview of the identified policy categories, while **Appendix D** includes the full results of our policy language analysis.

3.6.1 Policy Classification

The policies within the comprehensive plans were classified into three categories based on the main strategy focus they pursue: people-focused, production-focused, and preservation-focused. These classifications were developed in collaboration with the Puget Sound Regional Council.

People-focused policies are those whose primary objective is to directly improve individuals' lives, rather than indirectly influencing them through changes to the built environment—such as increasing the housing supply or preserving existing affordable housing stock. These policies aim to address RDI, exclusion, and displacement by employing a wide range of tools, such as improving. These include establishing tenant protections, providing emergency housing and shelters, and promoting homeownership.

Production-focused policies aim to expand the housing supply in response to growing demand so the city can make available affordable housing for all income levels in alignment with the goals of HB 1220. These policies aim to achieve housing abundance, making housing more accessible and affordable.

Achieving housing abundance requires the use of multiple tools like encouraging the development of Accessory Dwelling Units (ADUs), expanding tax incentive programs for housing construction, removing excessive regulatory barriers, and promoting innovative housing models such as co-housing and cooperatives. Additional tools include implementing affordable housing requirements for new developments, securing funding for subsidized housing, and fostering mixed-income communities.

Preservation-focused policies aim to prevent displacement by maintaining and protecting the existing affordable housing stock. These policies prioritize the preservation of mobile home parks, manufactured homes, and naturally occurring affordable housing (NOAH).

Additionally, policies were categorized into three primary dimensions based on their objectives: addressing **displacement**, **exclusion**, and/or **racially disparate impacts**. However, as these dimensions often intersect, policies can fall into multiple categories when they address overlapping issues. This expands the objectives-based categorization into an overall seven possible categories (**Figure 3**).

Figure 3. Intersection of policy objectives in comprehensive plans.

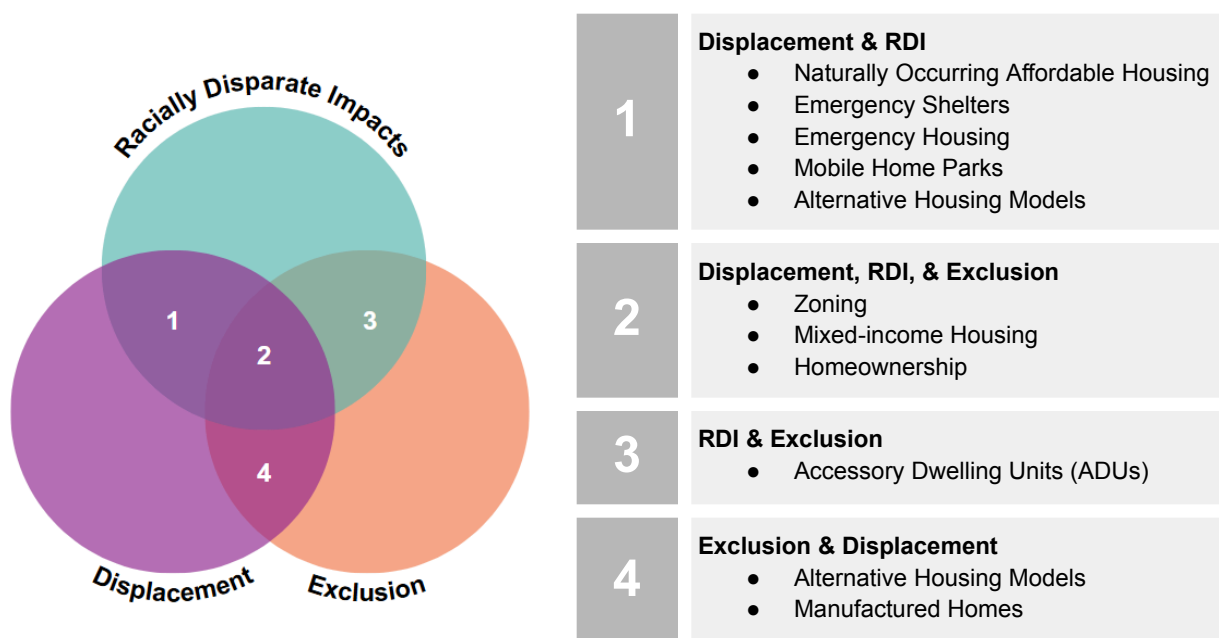


Table 3. Classification of policy categories under study within the Comprehensive Plans.

Classification	Policy Category	Objective	Criteria
People	Racially Disparate Impacts	RDI	Does the plan explicitly address and mitigate racially disparate impacts in housing?
	Exclusion	Exclusion	Does the plan include policies that specifically address exclusion?
	Tenant Protection	Displacement/RDI	Does the plan include policies for tenant protections?
	Emergency Housing	Displacement/RDI	Does the plan include policies ensuring adequate emergency housing options for individuals or families experiencing or at risk of homelessness?
	Emergency Shelters	Displacement/RDI	Does the plan include policies ensuring adequate shelter for people experiencing homelessness?
	Homeownership Rates	Displacement/ RDI/ Exclusion/	Does the plan include a policy to increase homeownership rates?
Production	Accessory Dwelling Units (ADU)	Displacement/ Exclusion	Does the plan include policies to encourage ADUs through zoning changes?
	Tax Incentive Programs	Displacement/ Exclusion	Does the plan include policies to establish or expand tax incentive programs to encourage housing development?
	Regulatory Barriers	RDI/ Exclusion	Does the plan include strategies to identify and remove excessive regulatory barriers to housing production?
	Alternative Housing Models	RDI/ Exclusion	Does the plan include policies to promote alternative housing models such as co-housing, housing cooperatives, co-living buildings?
	Affordable Housing Requirements	RDI/ Exclusion	Does the plan include affordable housing requirements for new housing developments?
	Subsidized Housing Funding Sources	Displacement/ RDI/ Exclusion/	Did the plan include subsidized housing funding sources?
	Zoning	Displacement/ RDI/ Exclusion/	Did the plan update the zoning map with an increased detail for zoning designations which allow for a larger variety of housing types?
	Mixed-Income	Displacement/ RDI/ Exclusion/	Does the plan promote mixed-income housing developments and neighborhoods?
Preservation	Mobile Home Parks	Displacement/RDI	Does the plan include policies ensuring mobile home parks preservation?
	Naturally Occurring Affordable Housing (NOAH)	Displacement/RDI	Does the plan include policies for preserving Naturally Occurring Affordable Housing?
	Manufactured Homes	RDI/ Exclusion	Does the plan include policies preserving and/or maintaining manufactured homes?

3.6.2 Policy Analysis

To better understand how municipalities across the Puget Sound region are addressing displacement, exclusion, and racially disparate impacts, and in order to identify good practices, policies were analyzed and classified using a three-stage framework based on their language to indicate accountability (directive or suggestive), orientation (action-oriented or outcome-oriented), and level of detail (detailed or concise). The decision tree presented in **Appendix B** was developed and applied to systematically determine the appropriate classification for each policy. An example of the complete analysis for a specific policy is presented in **Table 4** and the complete analysis for each policy under each policy category is presented in **Appendix D**.

Table 4. Example of analysis based on language, orientation and level of detail for Port Orchard's Policy HS- 25.

Port Orchard's Policy HS- 25		Advocate for additional funding at County, Federal, State, and other levels to expand programs that: facilitate home ownership for low- to moderate -income residents, prevent, avoidable, involuntary evictions and foreclosures, and provide assistance for repair, rehabilitation, energy efficiency, and weatherization.
Directive vs. Suggestive	Category	Directive
	Reasoning	<i>Advocate</i> is used to direct action, and it is clear what will be advocated for. Additional detail would be needed to determine specific advocacy actions.
Outcome vs. Action	Category	Action
	Reasoning	The outcome of <i>additional funding ... to expand programs</i> is achieved through <i>advocacy</i> .
Detailed vs. General	Category	Detailed
	Reasoning	<p>Who - The city.</p> <p>What - <i>Advocacy ... at County, Federal, State, and other levels to expand programs.</i></p> <p>Where - <i>At County, Federal, State, and other levels.</i></p> <p>When - When advocacy results in additional funding, homeownership will be facilitated, evictions and foreclosures will be prevented, and various assistance will be provided.</p> <p>Why - <i>To facilitate home ownership for low- to moderate -income residents, prevent, avoidable, involuntary evictions and foreclosures, and provide assistance for repair, rehabilitation, energy efficiency, and weatherization.</i></p> <p>How - The policy does not specify how Port Orchard will advocate at the County, Federal, State, or other levels.</p>

Accountability: Directive vs. Suggestive Policies

Policies are typically written using direct or suggestive language, which imply different commitments by the cities to implement said policies and, therefore, varying levels of accountability. Policies that use directive language begins with verbs in the imperative to express commands or requests.⁵⁸ Additionally, directive policies use modal auxiliary verbs that express an obligation by the city to implement the policy (Figure 4).

Alternatively, suggestive policies use the subjunctive mood to express a desire or possibility of an action the city could take to address a certain outcome, lacking accountability. Additionally, suggestive policies may still be written in the imperative mood, but contrary to a directive policy, will use action verbs that imply research or development, which do not commit the city to implementing the said contents of the policy (Figure 5).

Figure 4. Example of a directive policy.

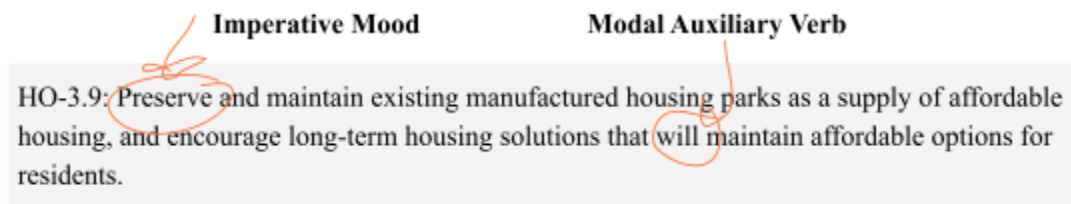
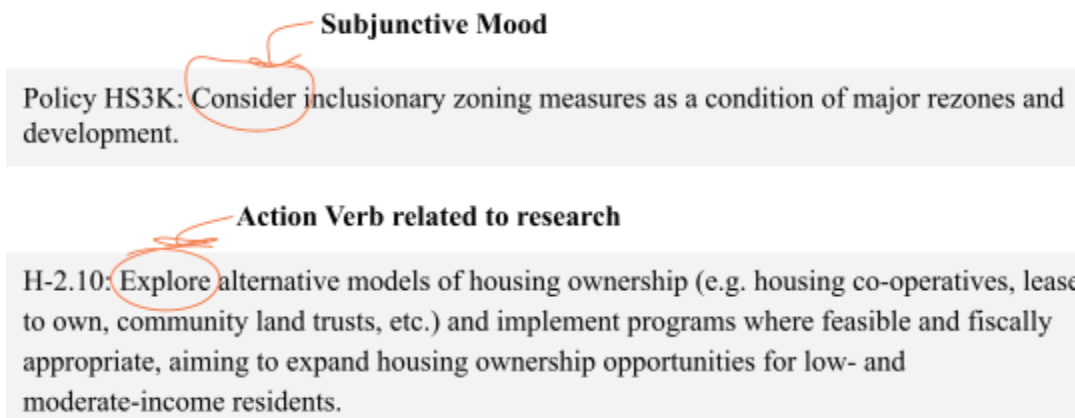


Figure 5. Examples of suggestive policies.



Orientation: Action-Oriented vs. Outcome-Oriented Policies

The orientation of policies illustrates municipalities's intention to enact change. Two ways the orientation can achieve this are through action-oriented and outcome-oriented policies. Action-oriented policies propose specific actions for municipalities to act upon, which strive to actively drive measurable change in communities. Outcome-oriented policies depict the result or future of the municipality once the policy has been acted upon, which sets the scene for the end result of policy implementation. Both types have their merits, but action-oriented policies offer specific implementation guidance on what cities can and should do to achieve the desired outcome.

⁵⁸ "Mayfield Handbook of Technical & Scientific Writing", MIT. https://www.mit.edu/course/21/21_guide/toc.htm; The Editors of Encyclopaedia Britannica. "mood." *Encyclopedia Britannica*, November 23, 2007. <https://www.britannica.com/topic/mood-grammar>.

Action-oriented policies inform how municipalities will mitigate displacement, RDI, and exclusion, rather than just depict what the community will look like once mitigation has occurred. Also, action-oriented policies allow city planners to create incremental approaches toward outcome-oriented goals from countywide and multi-countywide planning policies. Outcome-oriented policies recognize the change that needs to be made and what the future will look like once change has been implemented.

Detail: Detailed vs. Concise Policies

The level of detail refers to the level of development that a policy has, measured by its ability to answer the following questions: *who?*, *what?*, *where?*, *when?*, *why?* and *how?*. Policies with a high level of development are classified as detailed policies, whereas those with a lower level of detail or a more conceptual approach are classified as concise policies. Both types can still lead to well-executed policy implementation. Detailed policies may provide essential information detailing what the policy aims to accomplish, the target population of the policy, the strategy for accomplishing the policy, the time period at which it will occur, and where in the city it will be implemented. At the same time, if a policy is too detailed it could become too prescriptive and lack adaptability to meet future needs in the city.

Alignment with HB 1220

Washington is the first state to require cities to address exclusion, displacement and RDIs as part of their planning process. HB 1220 is groundbreaking legislation, and its mission is not fully reflected in the above analysis criteria. Policies can be well-written – that is, accountable, detailed, and clearly oriented – and still perpetuate exclusion, drive displacement, and contribute to racially disparate impacts. Therefore, the analysis of comprehensive plan policies also includes an evaluation of how closely they align with HB 1220.

Policies that align closely with HB 1220 are policies which begin to mitigate housing barriers. They demonstrate an intentional and thoughtful approach to inclusive, stabilizing, and racially conscious planning. Most often, these policies are well-written, with accountable, directive language and sufficient detail to support implementation. They are written with outcomes in mind, but also include an actionable plan to achieve HB 1220's mission.

One policy from each policy category (see **Table 2**) was selected to highlight alignment between HB 1220 and the policies included in comprehensive plans. Policies from as many municipalities as possible were included to acknowledge the work of all cities and to reflect a variety of approaches to addressing housing barriers.

Comparative Analysis

Table 1 illustrates the clear differences in the selected cities population size, level of diversity, and displacement risk. The authors used the comprehensive plans and interviews with the city planners to delineate differences in how cities' demographic characteristics informed their strategies to incorporate the HB 1220 mandates. As part of the analysis, the authors examined to what extent there were differences in the strategies cities utilized to address displacement, RDI, and exclusion by their respective demographics, grouping cities by their level of:

- Population: high (Kent, Kirkland, and Tacoma), medium (Lakewood, Lynnwood, Marysville, and University Place), and low (Port Orchard and Tukwila).
- Racial/Ethnic Diversity: high (Kent, Lakewood, and Tukwila) and medium (Kirkland, Lakewood, Lynnwood, Marysville, Port Orchard and University Place)

- Displacement Risk: lower risk (Kirkland, Marysville, and University Place), moderate risk (Lynwood, Port, Orchard, and Tacoma), moderate-higher risk (Kent and Lakewood), and higher risk (Tukwila).

These categories are informed by the selection criteria outlined in Chapters 3.1.1 and 3.1.2.

3.7 Research Methods & Analysis Limitations

The authors recognize several limitations regarding the methodology for sampling and analyzing the comprehensive plans. The strategy for selecting municipalities' comprehensive plans within the Puget Sound Region suffered from sampling bias. Two cities were included in the comparative case study that did not fully meet the selection criteria described in section 3.1; their inclusion was based on the client's recommendation. Similarly, the methodology for reviewing comprehensive plans outside of the Puget Sound also suffered from sampling bias, because while cities' selected were mentioned in the literature and/or received planning awards, the initial discovery of these plans to review came from the recommendation of the client. Further, our methodology for selecting interview participants suffered from sampling bias, because PSRC connected the authors with the respective city planners, who wrote the comprehensive plans under review. Undoubtedly, any number of cities and subject matter experts could have been chosen within and outside of the Puget Sound.

Additionally, the analysis for comparing cities' strategies based on their unique characteristics is limited because there were not many concrete similarities or differences between cities based upon their population size or racial/ethnic demographics. While chapter 5 highlights some differences within the policy analysis, there are some policies in which there are no clear similarities or differences whereby cities could meaningfully be grouped together by their population size, racial/ethnic diversity, or displacement risk levels.

Also, the approach for analyzing municipalities' policies to address RDI, displacement, and exclusion is limited, because the authors only reviewed policies within each municipality's plan that used evidence-based strategies for addressing these issues and the type of language used, e.g. directive vs. suggestive, action vs. outcome oriented, and concise vs. detailed. While the analysis concludes that directive, actionable, and detailed policies are better, there are nuances that are not fully addressed in the analysis. Further, a few policies within each municipality's plans were analyzed twice, because the policy included multiple policy categories.

Finally, the analysis is limited because the authors are unable to fully answer their research question regarding "best strategies" for addressing displacement, RDI, and exclusion, because all of these comprehensive plans have just been completed. It is unclear if the policies municipalities' stated in their comprehensive plans will be the "best" for addressing displacement, RDI, and exclusion without seeing them take effect. At the same time, the analysis does find to what extent municipalities incorporated evidence-based strategies for addressing these issues based on the literature, which could result in successful effects of these policies implemented in the Puget Sound region.

Chapter 3: Research Methods Summary

- The authors used a **purposive sampling technique** selecting ten cities within and five cities outside of the Puget Sound to analyze their comprehensive plans.
- The authors conducted **ten semi-structured interviews with city planners** from the selected cities to provide additional context
- The authors analyzed the comprehensive plans and interviews, using the following approaches:
 - Process Analysis for developing their comprehensive plans by looking at the following dimensions: **community engagement, alignment with HB 1220, organization, and resources.**
 - Policy Analysis, based on the actual written policies within the comprehensive plans, looking for **accountability, orientation, detail, alignment with HB 1220, and comparing policies based on groupings of cities by their demographic characteristics.**
- The methods the authors used have limitations regarding **sampling technique and scope of analysis.**

Chapter 4: Findings Related to the Comprehensive Planning Process

The following analysis was conducted using the methods described in Chapter 3.4. Our interviews with city planners provide the majority of information described here. In keeping with our interview protocol, cities and planners are not specifically referenced without explicit permission.

4.1 Public Engagement

4.1.1 Community Input

All of the cities in this analysis included community engagement opportunities as part of the comprehensive planning process. This reflects state law and growing common practice. However, each municipality approached community engagement differently. The author's interviews with municipal planners provided insight into the community engagement process and its impact on the comprehensive plans.

At one community engagement opportunity, a citizen asked the City Planner: "where are the people in this plan?" This question highlights the importance of community engagement – municipal housing policies are how governments plan to ensure sufficient, affordable, and accessible homes, where people live, work, raise families, and engage with their communities. This municipality responded to this question by flipping their planning concept to a human-centered plan that honors the reality of housing policy. While housing is shelter, homes are places where people feel comfortable, safe, and have a sense of connection and belonging.

Six planners mentioned targeting community outreach to communities that are not typically involved in local government. In some municipalities, these communities become accessible through partnerships with cultural organizations and other community touchstones, such as churches, nonprofit organizations, schools, or human services providers. The authors' interview with the Kent Long Range Planning Manager, Kristen Holdsworth, highlighted several best practices for community engagement:

- *Repeated Touches*: Public engagement is an ongoing process. Cities found more success when they engaged residents repeatedly, allowing relationships and trust to build over time. For example, returning to visit a high school classroom multiple times throughout the year allowed students to feel like their input mattered to the city, and the city and the students were able to see how the relationship shaped the planning process.
- *Strategic Partnerships*: Collaboration with community organizations, such as churches, social service providers, cultural centers, and schools, allowed cities to access populations who would otherwise be hard to reach. These partners often co-hosted events, provided important introductions, and helped frame the planning process in ways that resonated with community values.
- *Growth Mindset*: Planners who successfully engaged citizens were those who were most open to learning and receiving feedback. They trusted citizens to bring unique perspectives on the planning process, allowing diverse lived experience to become a valuable tool for housing policy development. They highlighted the importance of showing up in spaces where they were not the

linguistic or cultural majority. In short, they attended meetings conducted in languages other than English, heard critiques with curiosity and openness, and built lasting relationships outside traditional institutional settings.

The analysis of cities outside of the region also highlighted the importance of repeated touches, strategic partnerships, and a growth mindset. In Massachusetts, the City of Worcester conducted three focus groups to target seniors, youth, and Spanish-speakers, who were historically under-represented in community engagement opportunities.⁵⁹

This targeted engagement ensures that municipalities receive community feedback that accurately reflects the diverse populations they serve and is an important tool for ensuring that comprehensive plans reflect people with various ethnic and cultural backgrounds, life experiences, accessibility needs, and other diverse identities.

While certain groups automatically know how to tune in, other groups require targeted outreach in order to ensure that their voices are reflected in the planning process. Regardless of a citizen's familiarity with government involvement, municipalities often found success in incentivizing participation through accessibility and engagement strategies designed to make participation easy and enjoyable. Some of these strategies include:

- *Reducing Barriers to Participation:* Practical obstacles often prevent community members from engaging with government, especially in traditional settings like public forums and town halls. These barriers particularly impact low-income residents, caregivers, working families, people with disabilities, and people from marginalized communities. Municipalities reduced these barriers by holding engagement events in spaces where people already gathered, scheduling meetings at various times, and providing targeted accessibility services. Many municipalities were able to offer multilingual engagement opportunities and varied scheduling options. Municipalities frequently mentioned wanting to provide childcare, although only one municipality was able to resource this. By meeting people where they were, in terms of location, time, or accessibility needs, planners sent a message that every citizen's voice was valued.
- *Creating Inviting and Interactive Spaces:* Some cities incorporated food, flowers, and games into engagement events, which made them feel more like community gatherings rather than bureaucratic processes. Interactive methods such as sticker voting, mobile apps, and post-it note boards allowed participants to easily share their ideas without significant pressure or undue effort. These approaches made the planning process fun, fostered a sense of community ownership, and encouraged participation across ages, languages, and comfort levels.

The authors expected that municipalities would face some challenges when engaging communities in the planning process. The authors' interviews with planners revealed that these challenges tend to fall into three major categories: information asymmetry, place keeping concerns, and resource constraints. However, thoughtful engagement practices reduce the burden that these challenges pose; understanding the patterns can help municipalities move through these challenges.

- *Information Asymmetry:* City planners and other government officials often have technical knowledge that citizens do not, while citizens often have insights about their community that

⁵⁹ "Now | Next: Worcester's Citywide Plan," *The City of Worcester*, 2024, <https://www.worcesterma.gov/planning-regulatory/document-center/now-next-final-plan.pdf>

planners do not have. For example, planners spoke about how citizens did not always realize that many planning strategies are statewide legal requirements. One planner mentioned that they were relying on outdated and inaccurate information about their city's linguistic diversity, leading to a gap in resources for an important ethnic group. Similarly, both citizens and planners sometimes lacked background knowledge about systemic inequities. Because HB 1220 requires that plans address racially disparate impacts, displacement, and exclusion, people who have not had access to education on or lived experience with systemic inequity may not have the knowledge they need to engage fully with HB 1220's mission. Knowledge of *regional* systemic inequities is particularly important here: engaging in equitable and inclusive planning processes requires governments and community members to develop a shared understanding of how regional policymaking has shaped exclusion, displacement, and RDI. As described in Chapter 2.3, this history began in the 1800s and continued through historical practices such as redlining, but is sustained by modern policies that continue to perpetuate systemic inequities.

- *Placekeeping Concerns:* Community engagement allows citizens to engage in *placemaking*, a people-centered approach to planning that improves public spaces. Placemaking is an ongoing process, and it respects citizens as the experts on their communities.⁶⁰ Municipalities and their citizens engage in everyday placemaking through the formation of a community identity. *Place keeping* is a closely related concept which focuses on maintaining, rather than improving, public space. State-wide planning mandates, such as HB 1220, raise place keeping concerns when citizens feel that they threaten municipal autonomy or discredit existing community efforts. Every planner expressed some level of burnout due to frequent state intervention in municipal planning. Citizens often expressed concerns that top-down policy reform ignores nuance and assumes all communities face the same housing challenges and require the same solutions. Most municipalities felt that they were already addressing housing barriers or that *other* municipalities were the ones who were not doing enough to address housing barriers, and there was an overall sense that some cities will only do the bare minimum required by law while others have community values that have already produced policy to address racially disparate impacts, exclusion, and displacement.
- *Resource Constraints:* Community engagement is a costly process, requiring that municipalities invest financial resources, time, and energy into ensuring that citizens are reflected in comprehensive plans. Municipalities highlighted the importance of state funding for community engagement efforts, and some planners mentioned that they benefited from starting early on in the process, while others expressed that they would have done things differently if they had more time. Similarly, planners highlighted a balance between progress and feasibility that hinges on the local political climate, community values and priorities, and the involvement of municipal leadership. One planner praised the mayor for directing municipal departments to collaborate early, while another planner worried that the city council would not approve a plan that meaningfully transformed the city's housing policy.

Addressing these challenges requires sustained investment in building trust, reducing barriers to participation, and meeting communities where they are. Cities that acknowledged and adapted to these challenges were often better able to develop comprehensive plans that reflected the diverse needs of their residents.

⁶⁰ "Eleven principles for creating great community places," *Project for Public Spaces*, last modified May 15, 2025, <https://www.pps.org/article/11steps>

4.1.2 Culturally Competent Education and Access

Most comprehensive plans acknowledge and document the growing multilingual and English-limited populations within their municipalities, but many plans do not include policies that mandate culturally competent education and access to housing resources. A few municipalities believed it was important enough to add to their housing policies. For example, one of Kent's policies, Policy H-1.9 below, addresses the historic lack of outreach and education to homeowners and renters in multiple languages, which has led to displacement, racially disparate impacts, and exclusion.

Kent
Policy H-1.9 *Connect the Code Enforcement and Rental Housing Inspection programs with residential developers, property managers, and housing advocacy groups to increase outreach and education to homeowners and renters on the importance of preserving, upgrading, and rehabilitating housing with educational materials in multiple languages and annual classes and workshops.⁶¹*

Through the policy above, Kent aims to fill the gap by connecting existing programs to community stakeholders to ultimately reach often underserved homeowners and renters through multilingual educational materials, annual classes, and workshops. Increasing outreach and education to homeowners and renters through targeted programs in multiple languages will help boost housing and financial literacy among communities of color.

Despite the wide variety in ethnic demographic makeup among the Puget Sound cities in this analysis, only a few policies centered on non-English speakers.

Did You Know?

The City of Santa Ana, California, included policies centering non-English speakers:

Santa Ana
Policy HE-5.4 *Continue to fund services and support organizations that provide counseling, dispute resolution, and fair housing services, and make a concerted effort to disseminate resources to underrepresented residents, including non-English speakers.*

By acknowledging and addressing the gap in housing resources between English speakers and non-English speakers, municipalities can make progress towards undoing racially disparate impacts, including displacement.

⁶¹ "Kent Housing Options Plans," City of Kent, June 2021. 95.
<https://www.kentwa.gov/departments/econ-community-dev/kent-housing-options-plan>

4.1 Public Engagement Summary

- Interviewing planners revealed the importance of **centering people in the planning process**.
- The **best practices for engaging communities** include:
 - **Repeated touches** to build trust and relationships over time.
 - **Strategic partnerships** with community organizations who are connected to undervoiced citizens.
 - **Growth mindset** in which planners demonstrate openness to learning and receiving feedback by engaging whole-heartedly with communities different from their own.
- **Targeted outreach is essential** for culturally competent education and access. This means:
 - **Creating inviting and interactive spaces** to make the planning process fun, foster community ownership, and encourage participation across ages, languages, and comfort levels.
 - **Reducing barriers to participation** by selecting times and locations that meet citizens where they are at, and by creating environments that meet the accessibility needs of citizens.
 - **Including everyone**, particularly racially, ethnically, and linguistically diverse community members.
- **The above lessons help overcome common challenges**, such as information asymmetry, place keeping concerns, and resource constraints.

4.2 Policy Alignment

HB 1220 requires municipalities, by law, to “plan for and accommodate” housing affordable to all income levels, plan for STEP housing, identify and undo existing policies that perpetuate exclusion and racially disparate impacts, and establish anti-displacement policies.⁶² In reviewing municipalities’ comprehensive plans, the authors noticed variation in the implementation of these requirements. There was particularly high variation in municipalities’ updates to existing policies that perpetuate RDI, displacement, and exclusion.

4.2.1 Planning Housing Affordability at all Income Levels

The HB 1220 mandate requires municipalities to plan for housing affordability at all income levels, disaggregating their current housing stock data by the housing affordability per income group within their municipality to estimate their future housing needs. This analysis is meant to ensure that municipalities are planning for housing that people can afford at varying income levels, which mitigates RDI by preventing displacement of current residents and exclusion of newer residents. All the municipalities reviewed included this element, informed by countywide housing policies that include estimates of housing needs over the next twenty years. This element was also informed by their land capacity

⁶² “HB 1220 - 2021-22,” Washington State Legislature, 2021, <https://app.leg.wa.gov/billssummary?Year=2021&BillNumber=1220>

analyses that estimates how many housing units could be accommodated based on current zoning regulations. For example, Kirkland worked with ARCH to conduct a housing inventory analysis shown in **Figure 1**. Two municipalities' housing inventory analysis, Kent and Tukwila, were additionally informed by the sub-regional South King Countywide housing policies. Additionally, the authors found that five out of the nine municipalities contracted with consulting firms, ECONorthwest and BERK, to conduct their housing inventory analysis while the remaining municipalities conducted their analyses internally.

Figure 1: Kirkland current and future housing needs broken down by income level⁶³

Kirkland Housing Needs			
	Existing (2020)	Need	2044 total need
≤ 30 AMI; PSH	12 <1%	2,546	2,558 5
≤ 30 AMI; non-PSH	1,040 3%	4,842	5,882 11%
>30 – 50 AMI	1,784 4%	3,052	4,836 9%
>50 – 80 AMI	3,734 9%	1,022	4,756 9%
>80 – 100 AMI	8,141 20%	228	8,369 16%
>100 – 120 AMI	5,213 13%	259	5,472 10%
>120 AMI	20,094 50%	1,251	21,345 40%
Total	40,018	13,200	53,218

The housing inventory analysis was an important tool for municipal decision-making. Cities used this information to choose which policies and regulations to update to meet their future housing needs. For example, Kirkland's analysis showed that "under existing zoned capacity the city had a deficit of 1,382 units serving households earning less than 50% AMI, but the studied upzone capacity indicated a surplus of housing serving all income segments."⁶⁴ In interviews, two planners mentioned that they relied upon their regional growth centers as areas that would have the most increased density, in turn making it possible for their cities to meet their projected housing needs per income level. A few planners mentioned that there is sometimes inconsistency between these estimates and the actual population growth, which can make it challenging to find ways to meet the county's projected housing needs; these municipalities explicitly named incentivizing more housing production as a way to meet state requirements.

4.2.2 Analyzing and Updating Existing Policies that Perpetuate Exclusion and RDI

HB 1220 mandated cities evaluate their current policies and make updates to ones that perpetuate exclusion and RDI. This process is meant to ensure that municipalities remove, edit, and/or update policies that perpetuate exclusion and RDI as part of the comprehensive plan update. As two municipalities explicitly mentioned, racist exclusionary housing policies are not only limited to policies











⁶³ Stanger, Michael, Cissi Xu, and Scott Guter. "Final Draft Housing Inventory and Analysis." City of Kirkland, October 15, 2024. https://www.kirklandwa.gov/files/sharedassets/public/v/2/planning-amp-building/kirkland-2044-comp-plan/k2044-people/housing/pdfs/2024-10-15_final-draft-housing-inventory-and-analysis.pdf.

⁶⁴ "Comprehensive Plan By Section," City of Kirkland, 2024, <https://www.kirklandwa.gov/Government/Departments/Planning-and-Building/Planning-Projects/Kirkland-2044-Comprehensive-Plan-Update/The-Basics/Comprehensive-Plan-by-Section>

prior to the Civil Rights Act. They continue to this day in the form of regulations that emphasize the “preservation of neighborhood character,” often by maintaining widespread single-family zoning.

All the cities updated some of their existing policies. Five municipalities – Kent, Lynnwood, Marysville, Tukwila, and University Place – addressed this requirement prior to the required update. These cities included recommendations for updating existing policies as part of their Housing Action Plans. For example, Tukwila completed a policy evaluation recommendation matrix seen in **Figure 2**.

Figure 2: Tukwila's Recommendation Actions and Implementation considerations for updating their comprehensive plan as specified in their HAP.⁶⁵

Objective	#	Recommended Action	Recommendation Type	TIB Station Area or Citywide?	Near-term or Long-Term?	Impact to City Resources
Encourage Higher Density Development	A1	Modify Unit Mix Requirements		TIB Station Area	Near-Term	Moderate staff time
	A2	Reduce Parking Ratios		TIB Station Area	Near-Term	Moderate staff time
	A3	Modify Parking Standards for 4-over-1 Development		TIB Station Area	Near-Term	Moderate staff time
	A4	Adjust Recreational Space Requirements		TIB Station Area	Near-Term	Moderate staff time
	A5	Reduce Step Back Requirements		TIB Station Area	Near-Term	Moderate staff time
	A6	Promote Site Assembly for Smaller Parcels		TIB Station Area	Near-Term	Moderate staff time
Anti-Displacement and Community Stabilization	B1	Consider a 12-year MFTE Program		TIB Station Area	Near-Term	Moderate staff time and lost tax revenue for the duration of the program
	B2	Identify Opportunities to Increase Homeownership		Citywide	Long-term	Moderate staff time and program funding
	B3	Support Community and Faith-Based Institutions' Efforts to Develop Affordable Housing		Citywide	Long-term	Moderate staff time and program funding
	B4	Expand Tenant Supports		Citywide	Long-term	Moderate staff time and program funding

Four municipalities included discussions of updates to existing policies within other sections of their comprehensive plans. Port Orchard included a policy evaluation section in their RDI analysis in an appendix of their comprehensive plan that included an equity assessment whereby they made

⁶⁵ ECONorthwest. “Transit-Oriented Development Housing Strategies Plan.” City of Tukwila, September 2021. <https://www.tukwilawa.gov/wp-content/uploads/DCD-Tukwila-TOD-Housing-Strategies-Plan.pdf>. 82.

recommendations for updating existing policies to combat exclusion and RDI.⁶⁶ The housing background appendix within Lakewood's comprehensive plan included discussion of existing zoning regulations that they updated to remove barriers to housing, since the existing policies perpetuated exclusion.⁶⁷ Tacoma created its own Anti-Displacement Strategy report in 2024 that included policies and regulations they were planning to update to mitigate displacement, exclusion, and RDI.⁶⁸ Finally, Kirkland's Housing Inventory and Analysis report, linked to in their comprehensive plan, includes an analysis of existing zoning categories, related housing types, and whether existing zoning would result in future housing needs.⁶⁹

4.2.3 Analyzing Racially Disparate Impacts (RDI)

HB 1220 requires municipalities to conduct an analysis of racially disparate impacts caused by historical and contemporary exclusionary and discriminatory land use and housing policies and practices. This is the first time any municipality has been mandated to do this analysis, and the first time any state has required it within the nation. RDI requires municipalities to fully understand the disproportionate negative impacts experienced by different racial/ethnic groups as a result of historical and current housing policies and regulations.

All the municipalities prepared RDI analyses that included background information on their respective racial/ethnic demographics by income level, proportion of renters to owners, proportion of cost-burden households, and neighborhood level of displacement risk. Given that no municipality has done this analysis previously, it was unsurprising that the authors found that six out of nine cities contracted with consulting firms to prepare their RDI analyses. Three cities worked with BERK, two cities worked with ECONorthwest, and one worked with LeLand consulting. In reviewing the RDI analyses prepared by consulting firms, the authors noticed that those prepared by BERK and ECONorthwest only included current racial/ethnic demographic information and trends. In contrast, the RDI analysis prepared by LeLand also included a brief history of redlining and racial covenants. Additionally, two of the three municipalities whose RDI analyses were prepared by BERK included neighborhood-specific subarea plans for neighborhoods that have been historically and still are more racially and ethnically diverse and are also facing higher risks of displacement due to historical exclusion from other neighborhoods: South Lynnwood Neighborhood Plan and Lakewood Tillicum-Woodbrook subarea plan.

The three cities that prepared their own RDI analyses, Kent, Kirkland, and Tukwila, not only included current demographic trends and RDI but also historical trends. Tukwila's staff reviewed Tukwila's historical and current policies to analyze whether their policies were supportive, approaching supportive, or challenged the goals of racial inclusion, resulting in them identifying at least six historical racial covenants that prevented BIPOC homeownership. Kent analyzed the historical and current federal, state, county, and citywide policies that resulted in RDI, naming racial disparities in homeownership, eviction rates, homelessness, generational wealth, and displacement risks. Kirkland hired a historian to conduct a thorough historical analysis of Kirkland's land use and housing policies from its incorporation to present

⁶⁶ LeLand Consulting Group. "Appendix J - Port Orchard Racially Disparate Impacts Analysis." City of Port Orchard, May 2024. <https://lf.portorchardwa.gov/WebLink/DocView.aspx?id=284265&dbid=0&repo=PortOrchard&cr=1>

⁶⁷ City of Lakewood. "Lakewood Comprehensive Plan: Background Appendix." City of Lakewood, September 2024. <https://cityoflakewood.us/wp-content/uploads/2025/01/091724-CompPlan-BACKGROUND-APPENDIX-v.4.0-as-adopted.pdf>

⁶⁸ City of Tacoma. "Anti-Displacement Strategy." City of Tacoma, 2024. <https://cms.tacoma.gov/Office%20of%20Strategy/AHAS/ANTI-DISPLACEMENT%20STRATEGY%20-%20FINAL.pdf>

⁶⁹ "Comprehensive Plan By Section," *City of Kirkland*, 2024, <https://www.kirklandwa.gov/Government/Departments/Planning-and-Building/Planning-Projects/Kirkland-2044-Comprehensive-Plan-Update/The-Basics/Comprehensive-Plan-by-Section>

day. The historian identified no explicit racial exclusion in city documents, but did identify practices the city carried out that displaced and excluded certain racial groups.

The differences in municipalities' analyses suggests that cities who conducted their own RDI analysis instead of relying upon a consulting firm were able to gain a fuller understanding and more holistic view of how RDI results from historical and current racist policies and practices committed by the cities themselves. This allowed cities to see the role they played in perpetuating RDI and exclusion, and to identify ways they can actively undo RDI and exclusion through specific policies and practices.

4.2.4 Establishing Anti-Displacement Policies

HB 1220 mandates municipalities establish anti-displacement policies within their comprehensive plans. This requirement is meant to ensure municipalities actively work to prevent their communities from becoming displaced due to housing price increases or new and/or redevelopments. Tacoma created their own anti-displacement strategy report in 2024 to identify the policies and practices that perpetuated displacement to remove them and create new policies to mitigate displacement, prior to writing their comprehensive plans.

Six of the nine municipalities included explicit goals with some actionable policies to mitigate displacement. All six of the municipalities' anti-displacement policies include strategies to preserve current naturally affordable housing units to ensure community members remain where they currently live. Four of the six municipalities with anti-displacement policies include providing financial resources to community members facing the highest risk of displacement, either through relocation financial assistance or financial resources to help them gain homeownership. Two of the nine municipalities include policies to develop anti-displacement strategies, suggesting that these cities do not currently have, but do intend to create a strategy using their Housing Action Plans. One municipality included suggestive language to take into account populations at risk of displacement when making regulation changes but did not include policies to address displacement.

Passing these actionable and diverse anti-displacement policies are the first step for a municipality to see sustainable change to accessible housing in their city's future.

4.2.5 Addressing Gaps in Funding and Regulatory Barriers

HB 1220 mandates municipalities identify the barriers and/or limitations associated with addressing current and future housing availability. This analysis allows municipalities to explicitly state any unique barriers they must overcome to reach the housing stock requirements per income level that is proposed in their comprehensive plans. All the cities mentioned some gaps, limitations, and/or barriers to addressing housing availability. All mention zoning regulatory barriers preventing them from meeting all their current and housing needs, with all of them updating these policies to ensure they meet their housing demand. In the interviews and housing inventory analysis, six of the nine municipalities mentioned gaps in funding affordable housing, especially below 50% AMI. They stated that the market is not capable of building housing at a cost that is affordable. For these municipalities, four of them listed strategies they already employ to diversify financial resources to fund housing at the lowest AMI. These include HUD Community Development Block Grants, and pooling resources with neighboring municipalities through strategies such as Community Housing Trust and MFTE. During interviews five planners also mentioned that housing production is limited as most of their land is already developed, leaving no greenfield (open space) for new development.

4.2 Policy Alignment Summary

- There were **patterns in municipalities' implementation** of HB 1220 requirements.
 - **All** municipalities analyzed their current **housing stock by income level** to estimate future housing needs over the next 20 years.
 - **All** municipalities reviewed and updated *some* of their **existing housing and land use policies that perpetuated RDI, exclusion, and displacement**.
- **Six out of nine** municipalities **contracted with consultants** to conduct their RDI analysis, of which their analysis only included current racial/ethnic and socioeconomic trends.
 - The **three** municipalities that conducted their own RDI analysis added **more information about the historic and current policies that perpetuate RDI** as it pertains to their local municipality.
- **Six out of the nine** municipalities included **explicit goals with some actionable policies to mitigate displacement**.
 - Prior to their comprehensive plan, **Tacoma created their own Anti-Displacement Strategy in 2024** using evidence-based strategies to inform their 2024 Comprehensive Plan policymaking.
- **All** the municipalities mentioned some gaps, limitations, and/or barriers to addressing housing availability related to **funding resources and zoning regulations to build affordable housing for all income levels**.

4.3 Organization

Municipalities have broad authority regarding the organization of their comprehensive plans, which ensures that cities are able to customize their plans to suit the needs of their city. This analysis required the authors to navigate comprehensive plans for 10 municipalities in the Puget Sound Region, and doing so highlighted the importance of plans that are well-organized and accessible. As public administration professionals, the authors are well-versed in navigating governmental publications but also recognize that these documents can be challenging to navigate for citizens. Well organized comprehensive plans are accessible; have a clear organizational structure; utilize visual elements to enhance clarity; and demonstrate a high level of coherence and integration with other planning documents.

4.3.1 Accessibility

Nine of ten cities in this analysis had posted their 2025-2044 comprehensive plan online. The municipality that did not have their plan online was not able to provide it to the authors for analysis. Meaningfully engaging with the comprehensive plan, either for purposes of analysis, personal curiosity, or community engagement, requires that up-to-date versions are posted online at regular intervals. Comprehensive plans should be accessible from a range of devices, including desktop computers, laptops, tablets, and smartphones.

Kent, Tukwila, Kirkland, and Lynnwood had online landing pages for their comprehensive plans that stood out for accessibility. These municipalities' landing pages included sufficient information on comprehensive plans without overloading the user with text or visuals that make web pages more challenging to navigate. Links to the current plan were clearly indicated and users did not have to scroll excessively to find the link to the plan.

One municipal website included clear links to the plan in Tagalog, Korean, and Spanish - but the authors found that clicking on these links required the user to complete a captcha to prove they were human, and none of the authors who attempted the captcha were able to move past it. Instead, the captcha got "stuck," meaning verification could not be completed and the plan was not accessible in any language other than English. Other municipalities requested that users reach out to the city to request a copy of the plan in a language that was accessible for the user. In 2021, 7.9% of Washingtonians lived in a household where no-one spoke English very well.⁷⁰ This number continues to grow, and it is common that the most fluent English speaker in an immigrant household is a child. By providing online access to comprehensive planning documents in languages other than English, municipalities can ensure that they do not exclude linguistically diverse families.

4.3.2 Organizational Structure

All comprehensive plans were clearly organized by element, with some municipalities, such as Lakewood, including subarea plans. Most municipalities included overarching policy goals and organized individual policies beneath them. This pattern continues outside of the region – for example, Minneapolis illustrated their goals in the beginning of their comprehensive plan and linked all the different policies which addressed these goals (**Figure 3**) at the end of accessible and readable research that explained the reasoning for these goals.

Kent had larger policies than the other municipalities. This difference impacted the authors' policy analysis in the sense that one Kent policy contained the equivalent information of multiple policies from other municipalities, requiring the authors to consider this difference when comparing policies across municipalities. However, both organizational structures for policies can be well utilized, and the best option likely depends on a municipalities' unique needs.

⁷⁰ "Language Spoken at Home," Office of Financial Management, July 9, 2024, <https://ofm.wa.gov/washington-data-research/statewide-data/washington-trends/social-economic-conditions/language-spoken-home>

Figure 3: Links to Policies that Addressed Goals in Minneapolis Comprehensive Plan⁷¹

<div data-bbox="237 300 308 378"> </div> <div data-bbox="316 315 630 399"> <h2>Eliminate Disparities Policies:</h2> </div> <p>39 policies relate to Goal 1: Eliminate Disparities. Please refer to the pages listed below to read the content of each policy.</p> <hr/> <p>Policy 49: “Educational and Economic Access” on page 184</p> <hr/> <p>Policy 50: “Access to Technology” on page 186</p> <hr/> <p>Policy 51: “Healthy Pre-K Development” on page 187</p> <hr/> <p>Policy 52: “Human Capital and a Trained Workforce” on page 188</p> <hr/> <p>Policy 55: “Business Innovation and Expansion” on page 192</p> <hr/> <p>Policy 56: “Supporting Small Businesses” on page 193</p> <hr/> <p>Policy 2: “Access to Employment” on page 108</p> <hr/> <p>Policy 3: “Production and Processing” on page 110</p> <hr/> <p>Policy 58: “Business Districts and Corridors” on page 196</p> <hr/> <p>Policy 30: “Emphasize the Value of Minneapolis’ Arts and Culture” on page 158</p> <hr/> <p>Policy 31: “Artists and Creative Workers” on page 159</p> <hr/> <p>Policy 1: “Access to Housing” on page 105</p> <hr/> <p>Policy 33: “Affordable Housing Production and Preservation” on page 162</p> <hr/> <p>Policy 37: “Mixed Income Housing” on page 168</p> <hr/> <p>Policy 38: “Affordable Housing near Transit and Job Centers” on page 169</p> <hr/> <p>Policy 39: “Fair Housing” on page 170</p> <hr/> <p>Policy 40: “Homelessness” on page 171</p> <hr/> <p>Policy 41: “Tenant Protections” on page 173</p> <hr/> <p>Policy 42: “Expand Homeownership” on page 174</p> <hr/> <p>Policy 43: “Housing Displacement” on page 176</p> <hr/> <p>Policy 44: “Comprehensive Investments” on page 178</p>	<hr/> <p>Policy 23: “Coordinated Development Strategy” on page 149</p> <hr/> <p>Policy 45: “Leverage Housing Programs to Benefit Community” on page 179</p> <hr/> <p>Policy 46: “Healthy Housing” on page 180</p> <hr/> <p>Policy 15: “Transportation and Equity” on page 137</p> <hr/> <p>Policy 16: “Environmental Impacts of Transportation” on page 138</p> <hr/> <p>Policy 61: “Environmental Justice and Green Zones” on page 199</p> <hr/> <p>Policy 66: “Air Quality” on page 207</p> <hr/> <p>Policy 62: “Contaminated Sites” on page 201</p> <hr/> <p>Policy 81: “Social Connectedness” on page 230</p> <hr/> <p>Policy 85: “Access to Health, Social and Emergency Service” on page 235</p> <hr/> <p>Policy 63: “Food Access” on page 202</p> <hr/> <p>Policy 86: “Healthy Food in Institutions” on page 236</p> <hr/> <p>Policy 78: “Park Design and Programming” on page 226</p> <hr/> <p>Policy 34: “Cultural Districts” on page 164</p> <hr/> <p>Policy 48: “Freeway Remediation” on page 182</p> <hr/> <p>Policy 87: “Northside” on page 237</p> <hr/> <p>Policy 98: “Innovation Districts” on page 252</p> <hr/> <p>Policy 100: “Place-based Neighborhood Engagement” on page 255</p>
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4.3.3 Clarity and Visual Design

The use of figures, charts, and other visual elements can make comprehensive planning documents easier and more enjoyable to read. Port Orchard had a simple approach to the visual components of its

⁷¹ “Eliminate Disparities.” City of Minneapolis. 2025. <https://minneapolis2040.com/goals/eliminate-disparities/>.

comprehensive plan, but included helpful figures to visualize data. Kent and Lynnwood both added vivid designs and helpful data visualizations that were aesthetically pleasing for readers.

From outside the Puget Sound Region, Newark filled the pages of their comprehensive plan (**Figure 4**) with scenic shots of the city and its diverse residents. Reading through Newark's comprehensive plan seemed like reading through a city's high school yearbook due to all of the people pictured. This aligned well with Newark's people-centered vision and policies.

Figure 4: Newark's People-Centered Comprehensive Plan Visual Design⁷²



Newark's greatest strengths are its neighborhoods and residents: a sense of community and character that connects the city at a human scale and can form the basis of transformative action.

-Citywide tour takeaway, Newark360 team

4.3.4 Integration & Coherence

Three of the nine comprehensive plans were available exclusively as a single PDF document which included various planning elements and appendices, while one comprehensive plan was only available as individual elements and appendices. The other five municipalities provided both PDFs of the complete plan and PDFs of individual elements. All plans included a table of contents. Not all of the plans linked the table of contents to the corresponding pages of the document, which greatly improves the ease of navigating a document.










Generally, the authors found comprehensive plans difficult to navigate as individual documents, particularly when there were many documents within a comprehensive plan that cross-referenced one another. For example, the municipality that only provided individual PDFs for each element frequently referenced figures or appendices in other elements; to analyze this required switching between tabs and searching for other documents. In contrast, another comprehensive plan read “like a book,” where one could flip between pages and make connections without having to exit the document. Kent's Table I-1: Other City Plans (**Figure 5**) below shows the intersectionality between different city plans and the required comprehensive plan elements.

Titles and headers are also important tools for users attempting to navigate comprehensive plans. All of the comprehensive plans utilized similar strategies for titles and headers. Some municipalities, including Lynnwood and Kent, used headers like “What is This Plan?” to create spaces within the document that targeted citizens and other users who might be unfamiliar with the planning process.

⁷² “Newark 360 Shaping Our City Together.” City of Newark, September 2022. <https://www.newark360.org/newark360-final-plan>

Figure 5: Table I-1: Other City Plans. Kent Comprehensive Plan 2044.

Table I-1: Other City Plans

	Comprehensive Plan Elements								
	 LAND USE	 HOUSING	 TRANSPORTATION	 PARKS AND RECREATION	 ECONOMIC DEVELOPMENT	 UTILITIES	 CAPITAL FACILITIES	 SHORELINE	 CLIMATE RESILIENCY
Transportation Master Plan	X		X		X		X	X	X
Kent Housing Options Plan	X	X	X		X			X	X
Stormwater Management Plan	X					X	X	X	X
Industrial Subarea Plan (Rally the Valley)				X	X	X		X	
Downtown Subarea Plan	X	X	X		X		X		
Midway Subarea Plan	X	X	X		X		X		
Parks and Open Space Plan	X		X	X			X	X	X
Other City Functional Plans	X		X	X		X	X	X	X

4.3 Organization Summary

- There was **variation in municipalities' organization** of comprehensive plans.
- **Nine of ten** municipalities published comprehensive plans online. Of those, **Kent, Tukwila, Kirkland, and Lynnwood** stood out for accessibility.
- **All cities need to have their comprehensive plans available in multiple languages** because 7.9% of Washingtonians live in a household where no one speaks English very well.
- **Clarity and visual design** help readers stay engaged when reading through massive comprehensive plans while attracting the reader to what is most important.
- **Five of nine** municipalities made available a single PDF document with the full comprehensive plan and also made available separate PDFs for each section to **allow readers flexibility** to read the comprehensive plan as a book or search individual elements for ease of access.

4.4 Resources Used for Plan Development

Municipalities accessed a multitude of resources to develop their comprehensive plans. These resources include financial assistance and technical assistance, such as webinars, checklists, and data visualizations, as well as guiding planning documents and expert consultants. This section is broken up by the following sub sections: data, financial, informational, and consultant resources.

4.4.1 Data Resources

HB 1220 requires municipalities conduct an inventory and analysis of all housing needs to identify (1) areas with high displacement risk and (2) local policies and regulations that result in RDI, displacement, and exclusion. Cities utilized multiple data sources to identify their housing needs, demographics, and displacement risks.⁷³ **Table 1** highlights the most common data sources used by municipalities when developing the housing elements of their comprehensive plans: 2020 US Census, 2021 American Consumer Survey, Washington Office of Financial Management, US Housing and Urban Development, and PSRC displacement risk map data.

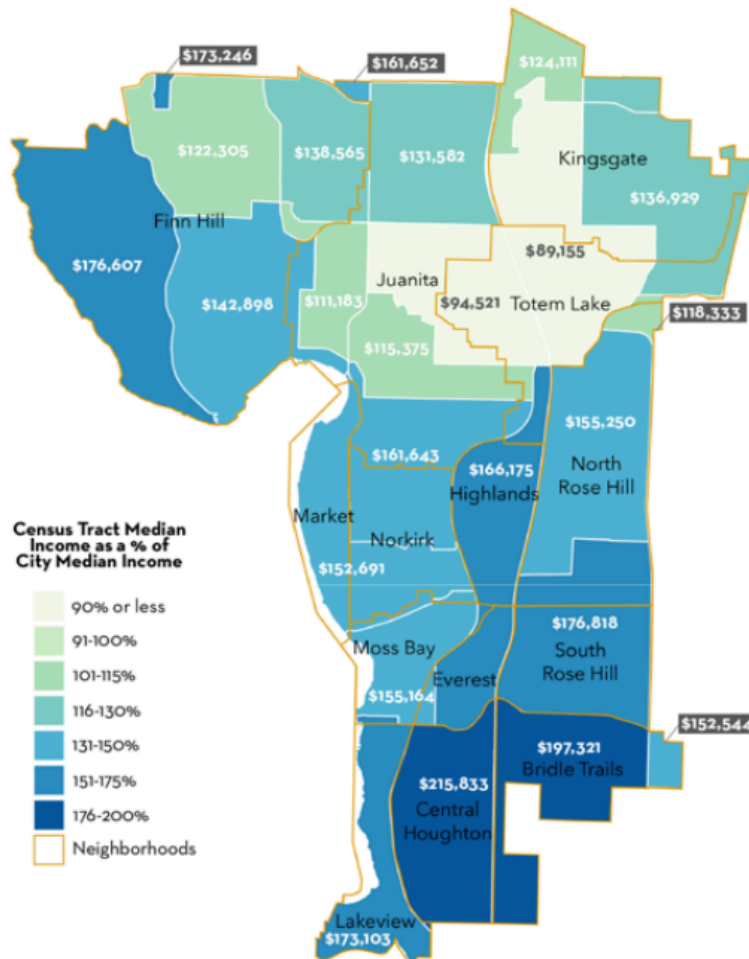
Table 1. Shows for the selected cities the data sources they utilized to develop the housing elements of their comprehensive plans. Checkmarks indicate cities using the data source.

City	Federal Data			State Data	Regional Data
	2020 US Census	US Housing and Urban Development	2021 American Consumer Survey	Washington Office of Financial Management	PSRC Displacement Risk Map
Kent	✓	✓	✓	✓	✓
Kirkland	✓	✓	✓	✓	✓
Lakewood	✓	✓	✓	✓	✓
Lynnwood	✓	✓	✓	✓	✓
Marysville	✓	✓	✓	✓	
Port Orchard	✓	✓	✓	✓	
Tacoma	✓	✓	✓	✓	✓
Tukwila	✓	✓	✓	✓	
University Place	✓	✓	✓	✓	✓

⁷³ "HB 1220 - 2021-22," Washington State Legislature, 2021, <https://app.leg.wa.gov/bills/summary?Year=2021&BillNumber=1220>

- Federal Data US:** All of the municipalities used federal data sources to develop the statistics used in their inventory and analysis. US Housing and Urban Development (HUD) data was used to determine the share of renters and homeowners, while data from the 2020 US Census and the 2021 American Consumer Survey was used to inform demographic data, such as race and income. The latter two sources provide cities with information on household size, gender, race and ethnicity, age, income, and other important demographic markers. Cities mapped these data by Census Tract to visualize demographics across neighborhoods, as seen in **Figure 6** for Kirkland. Federal data has long been the most reliable, available, and respected source of demographic information in the US.

Figure 6: Map of Kirkland by median household income, as presented in Kirkland’s Comprehensive Plan, using data sourced from the U.S. Census Bureau, 2022 American Community Survey (ACS) 1-Year Estimates.⁷⁴

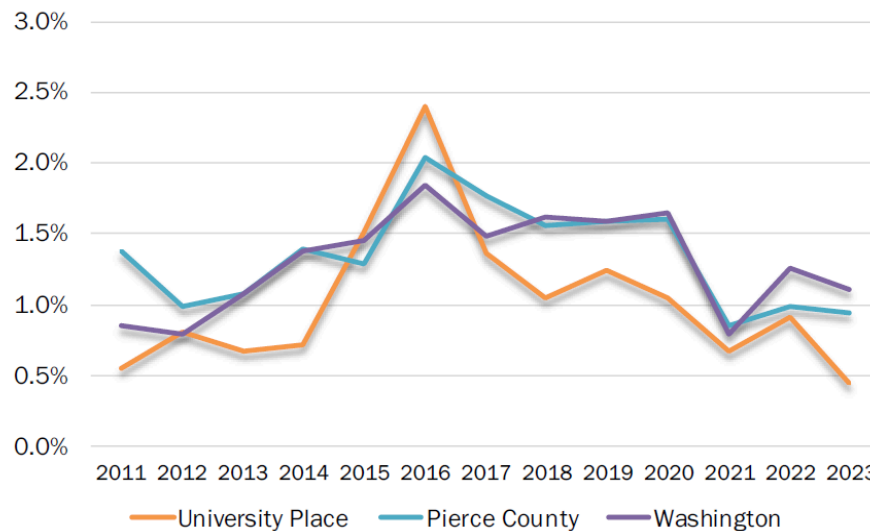


⁷⁴Stanger, Michael, Cissi Xu, and Scott Guter. “Final Draft Housing Inventory and Analysis.” City of Kirkland , October 15, 2024. https://www.kirklandwa.gov/files/sharedassets/public/v/2/planning-amp-building/kirkland-2044-comp-plan/k2044-people/housing/pdfs/2024-10-15_final-draft-housing-inventory-and-analysis.pdf.

- **State Data:** In addition to federal data sources, cities utilized state, regional, and county data to estimate their housing needs by income level. Cities included historical growth rates from Washington State's Office of Financial Management's (OFM) as well as countywide planning policies to predict future growth and estimate housing needs over the next 20 years. Cities used the OFM data to estimate growth rates of their respective city compared to the county and the state overall as seen in **Figure 7** for University Place.

Figure 7: University Place Population Growth Compared to Pierce County and Washington State 2011-2023⁷⁵

Source: Office of Financial Management, Washington. Note: Growth rate shows the annualized compounded growth rate.

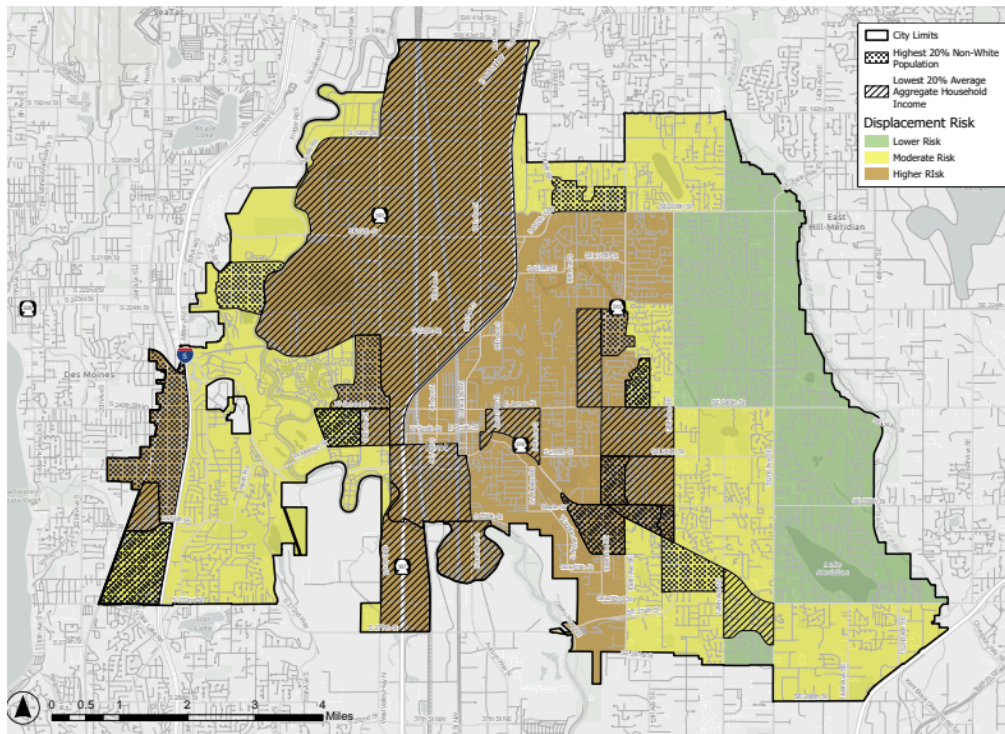


- **Regional Data:** Most cities used PSRC's displacement risk data, which used five indicators of displacement risks: socio-demographics, transportation qualities, neighborhood characteristics, housing, and civic engagement to differentiate neighborhoods as having low, moderate, or high risk for displacement as seen in **Figure 8** for Kent, which used both PSRC's categories and overlaid neighborhoods with highest 20% BIPOC and lowest 20% aggregate household income.⁷⁶

⁷⁵ City of University Place, "Comprehensive Plan." City of University Place, December 2024. <https://www.cityofup.com/394/2024-Comprehensive-Plan-Periodic-Update>

⁷⁶ "Displacement Risk Mapping," *Puget Sound Regional Council*, 2025. <https://www.psrc.org/our-work/displacement-risk-mapping>

Figure 8: A Map of Kent's Displacement Risk overlaid by neighborhoods with highest 20% BIPOC and lowest 20% aggregate household income.⁷⁷



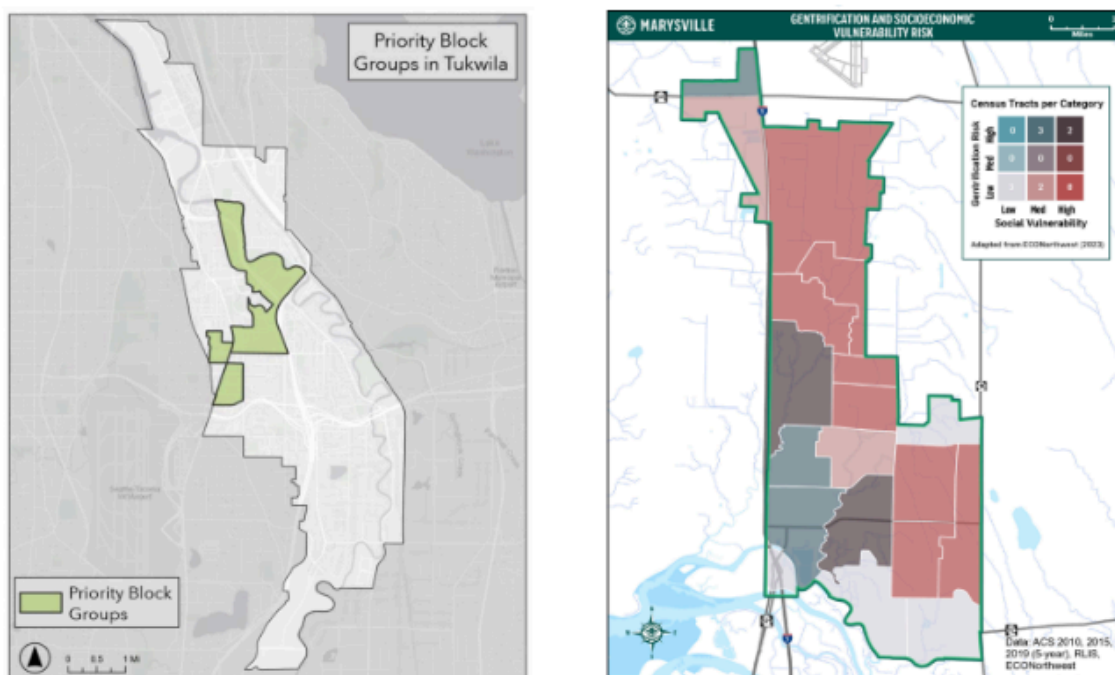
A couple of smaller cities used different resources to identify their respective displacement risks. Tukwila found the census tract level too broad, so they visualized displacement risk at the block level of analysis as shown in **Figure 9 (left)**. They identify three block groups along Tukwila International Boulevard as the most vulnerable to displacement due to a combination of a high proportion of renters, cost-burdened households, lower income households, high proportion foreign-born residents, lower educational achievement levels, and lower rate of English proficiency.⁷⁸ Alternatively, Marysville used estimates of displacement risk prepared by ECONorthwest for their HAP. These estimates at the census tract level looked at the levels of gentrification risk and social vulnerability as shown in **Figure 9 (right)** for Marysville. They identified areas with low gentrification risk (not showing recent signs of gentrification) characterized by low levels of economic vulnerability, little to no recent demographic change, and a relatively stable housing market. They identified high social vulnerability risk tracts as having the largest shares of the region's most disproportionately cost-burdened demographic groups, such as people without a bachelor's degree or higher, people of color, and people living with one or more disabilities.⁷⁹

⁷⁷ City of Kent, "Kent 2044 Comprehensive Plan: Building Our Future Together," City of Kent, December 2024. <https://engage.kentwa.gov/futurekent>

⁷⁸ "Tukwila Comprehensive Plan," *City of Tukwila*, December 2024, <https://www.tukwilawa.gov/departments/community-development/comprehensive-plan/comprehensive-plan-element-drafts/>

⁷⁹ "Housing Action Plan for City of Marysville," *City of Marysville*, September 2023, https://marysvillewa.gov/DocumentCenter/View/12271/2023-09-08-DRAFT-Housing-Action-Plan_

Figure 9: On the left, a map of Tukwila’s Priority Block Group.⁸⁰ On the right, a map of Marysville Gentrification and Socioeconomic Vulnerability Risk.⁸¹



4.4.2 Consultancy Resources

Contracting with consulting groups is often essential for jurisdictions developing comprehensive plans who lack required expertise in house. The consultant groups identified in **Table 2** are expert local firms that specialize in planning, policy development, analysis, and community engagement for local governmental municipalities.

All the municipalities used consultant groups in some capacity to develop the housing elements of their comprehensive plans and/or HAPs. Kirkland is the only municipality that did not use a consultant group to develop their HAP but used Parametrix to prepare their Housing Inventory & Analysis for their comprehensive plan. Four of nine municipalities contracted with consulting firms to conduct their RDI analysis for their respective municipalities. Four of nine districts contracted with ECONorthwest consulting to prepare their respective HAPs. Seven of nine municipalities mentioned in their comprehensive plans that consulting groups helped prepare their plans, informing their writing, analysis, and/or community engagement.

For example, in Kent’s Request-for-Proposals (RFP) for their comprehensive plan update, they included a request for consultants to specifically aid in updating their housing element by making it “consistent with the Kent Housing Options Plan, the Countywide Planning Policies including new requirements coming in mid-2022 from the Department of Commerce as well as any new requirements in the Countywide

⁸⁰ City of Tukwila, “Tukwila Housing Background Report,” City of Tukwila, December 2024. <https://www.tukwilawa.gov/wp-content/uploads/DCD-4-Housing-Background-Report-12-24.pdf>

⁸¹ ECONorthwest, “Housing Action Plan,” City of Marysville, December 2023. https://legistarweb-production.s3.amazonaws.com/uploads/attachment/pdf/2320966/2023-11-20-DRAFT_Housing_Action_Plan.pdf

Planning Policies that come from the Affordable Housing Committee and the Growth Management Planning Council.”⁸²

Some municipalities created RFPs, requesting consultants to do the analysis for the city; for example, University Place included “completing the Washington Department of Commerce checklists and performing a gap analysis of existing planning policies for consistency with the Growth Management Act, Vision 2050 and Countywide Planning Policies” within their RFP.⁸³ These two examples showcase how cities utilized consultant services differently depending upon the in-house expertise, capacity, and financial resources available to them.

Table 2 outlines the consulting firms municipalities contracted with to develop their HAPs and/or comprehensive plans.

City	Consulting Firm
Kent	MIG, EcoNorthwest*, BERK
Kirkland	Parametrix
Lakewood	BERK, Feher & Peers, Judy Stoloff Associates, Tom Phillips - Seattle
Lynnwood	LeLand, BERK, MAKERS
Marysville	EcoNorthwest
Port Orchard	AHBL, MAKERS, LeLand
Tacoma	EcoNorthwest, BERK
Tukwila	EcoNorthwest
University Place	EcoNorthwest, LDC Inc., BERK*

4.4.3 Financial Resources

Comprehensive plan development requires monetary resources to support the data collection and analysis, community engagement, and writing of the plan. Cities across the Puget Sound have varying levels of financial resources to fund their comprehensive plan development, with all municipalities using existing funds, and some needing additional resources. **Table 3** outlines the most common funding resources municipalities used in the development of their comprehensive plans.

- *WA Department of Commerce Housing Action Plan and Implementation Grant (HAPIs)*: Three of the nine municipalities acquired funding for their Housing Action Plan (HAP) development through Washington Department of Commerce’s Housing Action Plan and Implementation (HAPI) grant. The HAPI grant allocated in 2021 provided municipalities with funding to research their housing needs, engage the community in a public process and identify zoning changes or programs to encourage private developers to build more housing that meets the needs of residents,

⁸² “RFP City of Kent Comprehensive Plan Update,” *City of Kent*, 2022.

https://www.washington-apa.org/assets/docs/RFP-RFQ/2022/City-of-Kent_Comp-Plan-RFP_updated_4-25-2022.pdf

⁸³ “RFP Comprehensive Plan Periodic Update,” *City of University Place*, 2022.

<https://www.cityofup.com/DocumentCenter/View/3147/2024-Comprehensive-Plan-Periodic-Update-Request-for-Proposal-PDF?bidId>

particularly incorporating HB 1220 requirements.⁸⁴ Municipalities' HAPs informed the development of respective comprehensive plans, because they include municipalities' RDI analysis, and estimate of housing stock and future growth needs by income level.

- *WA Department of Commerce Transit-Oriented Development and Implementation Grants:* Two of nine municipalities acquired funding for their Transit-Oriented Development and Implementation (TODI) through the Washington Department of Commerce's TODI Grant. The grant provides municipalities with funding to review zoning in areas served by current or forthcoming high frequency bus service and light rail transit and allows communities to study the environmental impacts of planned development in advance to streamline permit processing times. The transit-oriented development that results will be an efficient way to absorb the state's expanding population and build high-quality neighborhoods.
- *Sub-Regional Pooled Resources:* Five of the nine municipalities pooled resources with other municipalities in their respective regions to aid in the development of their comprehensive plans. Six cities in South King County — Auburn, Burien, Federal Way, Kent, Renton, and Tukwila — submitted applications for funding through HB 1923 with portions of each funding identified for a collaborative effort to develop a subregional housing action framework in 2020, contracting with EcoNorthwest to develop the framework. The sub-regional housing action plan included a housing context assessment, public engagement, an evaluation of existing housing policies, and recommendations for future housing strategies to increase residential building capacity plan for growth in the South King County Region and participating cities.⁸⁵ Further, Edgewood, Fife, Gig Harbor, Milton, and University Place pooled their financial resources together, submitting a joint application for the South Sound Affordability Partners and BERK consulting to conduct their RDI analysis.⁸⁶ Additionally, Kirkland, Redmond, and Bellevue pooled their resources to work collaboratively with Eastside for All on their collective public education and community involvement when developing their comprehensive plans.⁸⁷

⁸⁴ "Housing Action Plan Implementation Awardees", *Washington Department of Commerce*, 2021.

https://www.commerce.wa.gov/wp-content/uploads/2021/11/HAPI-Award-List_Round1_with-amount-1.pdf

⁸⁵ "South King County Subregional Housing Action Framework – Task 2 Housing Context Assessment Methods Memo," *EcoNorthwest*, 2020,

https://cdns5-hosted.civiclive.com/UserFiles/Servers/Server_11045935/File/Business/Building%20%20Construction/Planning%20Initiatives/South%20King%20County%20Subregional%20Housing%20Action%20Framework%20-%20Housing%20Context%20Assessment.pdf

⁸⁶ University Place Interview

⁸⁷ Kirkland Interview

Table 3. Outlines the most common funding sources cities used in the development of their comprehensive plans. Checkmarks indicate cities used the funding resource.

City	WA Department of Commerce HAPI Grant	WA Department of Commerce TODI Grant	Subregional group pooled resources
Kent			South King County Sub-Regional Housing Action Plan
Kirkland			Eastside for All**
Lakewood			
Lynnwood	✓	✓	
Marysville	✓		
Port Orchard			
Tacoma		✓	
Tukwila	✓		South King County Sub-Regional Housing Action Plan
University Place			South Sound Housing Affordability Partners

4.4.4 Informational Resources

Apart from funding and financial resources, cities utilized various informational and consulting resources to inform their comprehensive plans. City planners utilized information from Washington State Department of Commerce Updating GMA Housing Elements Checklist, PSRC VISION 2050, PSRC Regional Growth Center, Countywide Housing Policies, and their respective Housing Action Plans (HAP) to update the housing elements within their comprehensive plans illustrated by **Table 4**.

- Washington Department of Commerce's Updating GMA Housing Elements checklist:* All cities referred to Washington Department of Commerce's Updating GMA Housing Elements checklist that provided municipalities with comprehensive guidance for updating their comprehensive plans and regulations with respect to incorporating HB 1220.⁸⁸ Commerce's guidance included a Housing for All Planning Tool that helps municipalities calculate housing need projections by county, projection year, and target population.⁸⁹ While Commerce's guidance is comprehensive and was useful to all the municipalities, some city planners mentioned the guidance did not come quick enough, since its release coincided with their writing of their comprehensive plans.
- Housing Action Plans:* Eight of nine cities referred to their Housing Action Plans (HAP) when developing the housing element of their comprehensive plans. HAPs are an optional tool, described in RCW 36.70A.600(2), that defines strategies and implementing actions to promote greater housing diversity, affordability and access to opportunity for residents of all income

⁸⁸ "Updating GMA Housing Elements," *Washington Department of Commerce*, 2024, <https://www.commerce.wa.gov/growth-management/housing-planning/housing-guidance/>

⁸⁹ Ibid.

levels.⁹⁰ While all cities used their HAP when developing their housing elements, only two municipalities' HAPs were developed after HB 1220 passed into law in June 2021; the remaining six HAPs predated the passing of HB 1220. Despite the timeline execution differences, all the HAPs included housing inventory analysis, community engagement, and housing needs assessment by income level which largely aligns with HB 1220's mandates to disaggregate projected housing needs by income level.

Table 4 outlines the most common resources city planners utilized to inform the housing elements of their comprehensive plans. Checkmarks indicate cities using the resource.

City	WA Department of Commerce	HAP	PSRC Regional Growth Center	PSRC VISION 2050	Countywide Housing Policies	Other
Kent	✓	✓ Housing Options Plan 2021	✓	✓	✓	
Kirkland	✓	✓ Housing Strategy Plan 2018	✓	✓	✓	
Lakewood	✓		✓	✓	✓	
Lynnwood	✓	✓ HAP 2021	✓	✓	✓	
Marysville	✓	✓ HAP 2023		✓	✓	
Port Orchard	✓	✓ HAP 2023		✓	✓	
Tacoma	✓	✓ Affordable Housing Action Strategy 2018	✓	✓	✓	Anti-Displacement Strategy 2024
Tukwila	✓	✓ TOD Housing Strategies Plan 2021	✓	✓	✓	
University Place	✓	✓ Housing Action Toolkit 2021	✓	✓	✓	

- *PSRC Regional Growth Centers*: Seven of nine municipalities have regional growth centers. Regional Growth Centers are locations within the region that have the most significant business, governmental, and cultural facilities and are planning for growth.⁹¹ Municipalities must adopt subarea plans to designate as their regional growth centers within their comprehensive plans. As part of planning for the center, PSRC provided various resources to municipalities to guide their regional growth center subarea plan, including setting growth targets, displacement risk mapping,

⁹⁰ "Housing Action Plans," *EZview*, accessed May 15, 2025, https://www.ezview.wa.gov/site/alias__1976/37657/housing_action_plans.aspx

⁹¹ "Centers," *Puget Sound Regional Council*, accessed May 15, 2025, <https://www.psrc.org/our-work/centers>

and equitable planning.⁹² All the municipalities with designated regional growth centers included subarea plans for regional growth with most municipalities designating their downtowns as regional growth centers.

- *PSRC VISION 2050*: All municipalities used PSRC’s VISION 2050, multi-county planning policies (MPPs) framework for updating countywide planning policies. Cities and counties use MPPs as a guide when updating local comprehensive plans.
- *Countywide Housing Policies*: Municipalities also used their respective countywide housing policies which guide the county’s projected growth rates for all the municipalities within the county. Cities used the countywide housing policies to estimate projected housing needs for their respective cities based upon the overall county needs. King, Kitsap, Pierce, and Snohomish each developed their own countywide housing planning document for all their respective municipalities to align their comprehensive plans.
- *Other Guiding Resources*: In addition to the state, regional, countywide guidance documents, Tacoma also developed an Anti-Displacement Strategy in 2024. Their Anti-Displacement Strategy informed their policies for addressing displacement as mandated by HB 1220 in their comprehensive plans. The strategy built upon their 2018 Affordable Housing Action Strategy to update it with specific evidence-based strategies for preventing those at risk from being displaced, including tenant protections and homeownership assistance.

4.4 Resources for Developing Comprehensive Plans Summary

- Municipalities used **data, financial, informational, and consultancy resources** to develop their comprehensive plans.
- The most common **data sources** municipalities used were:
 - **US Census, HUD, WA OFM, and the PSRC displacement risk maps.**
- Only a few municipalities used **financial resources** from the state and/or pooled resources in a subregional group.
 - **Three** cities received the **WA Department of Commerce HAPI Grant.**
 - **Two** municipalities received the **WA Department of Commerce TODI Grant.**
 - **Four** municipalities **pooled their financial resources** with neighboring municipalities.
- **All** municipalities used **informational resources** from **WA Department of Commerce, PSRC, and Countywide Housing Planning Policy** documents.
- **Eight out of nine** municipalities used information from their **HAP** to complete their comprehensive plans.
- **All** municipalities contracted with **consultants** to assist them in completing at least a portion of their comprehensive plans.

⁹² “Centers,” *Puget Sound Regional Council*, accessed May 15, 2025, <https://www.psrc.org/our-work/centers>

Chapter 5: Findings Related to Comprehensive Plan Policies & Language

5.1 People Policies

As mentioned in Chapter 4, people-focused policies are those whose primary objective is to directly impact individuals' lives, rather than indirectly influencing them through changes to the built environment—such as by increasing housing supply or preserving existing affordable housing stock. These policies aim to address racially disparate impacts, exclusion, and displacement by employing a wide range of tools. These include establishing tenant protection, providing emergency housing and emergency shelters, and promoting homeownership (**Table 1**).

Table 1. Classification of people policy categories under study within the Comprehensive Plans.

Classification	Policy Category	Objective	Criteria
People	Racially Disparate Impacts	RDI	Does the plan explicitly address and mitigate racially disparate impacts in housing?
	Exclusion	Exclusion	Does the plan include policies that specifically address exclusion?
	Tenant Protection	Displacement/RDI	Does the plan include policies for tenant protections?
	Emergency Housing	Displacement/RDI	Does the plan include policies ensuring adequate emergency housing options for individuals or families experiencing or at risk of homelessness?
	Emergency Shelters	Displacement/RDI	Does the plan include policies ensuring adequate shelter for people experiencing homelessness?
	Homeownership Rates	Displacement/ RDI/ Exclusion/	Does the plan include a policy to increase homeownership rates?

5.1.1 Tenant Protection

Tenant protection policies, depending on their specific objectives, are designed to safeguard renters from unfair evictions, excessive rent increases, and substandard living conditions. These policies aim to stabilize the real estate market, provide housing stability for tenants, and help in avoiding or slowing the process of displacement for households^{93 94} as mandated by HB 1220. The landlord-tenant relationship in the state of Washington is regulated by the Residential Landlord-Tenant Act (RCW 59.18) and policies at the local level can include actions related to eviction, relocation, and foreclosure assistance; legal aid; tax relief programs; rental inspection; and tenant education among others.

⁹³ Washington State Department of Commerce, *Guidance to Address Racially Disparate Impacts. Updating your housing element to address new requirements*. April 2023. <https://www.commerce.wa.gov/growth-management/housing-planning/housing-guidance/>

⁹⁴ Chapple, K., Loukaitou-Sideris, A., Miller, A., & Zeger, C. (2023). The Role of Local Housing Policies in Preventing Displacement: A Literature Review. *Journal of Planning Literature*, 38(2), 200–214. <https://doi.org/10.1177/08854122221137859>

Accountability: Directive or Suggestive Language

A total of eight policies referring to tenant protections were identified with only five of the nine municipalities under study having at least one policy referring to this topic. All of them use directive language including verbs such as "expand", "implement", "adopt", and "advance".

Orientation: Action-Oriented or Outcome-Oriented Language

All of the eight policies that referred to tenant protections used action-oriented language. Outcomes such as enhancing tenant protections, ensuring stable housing, or aiding in displacement prevention, were linked to a variety of actions, including advancing access to resources on tenant rights and protections, adopting renter protections, or leveraging resources like foreclosure assistance, legal aid, and tax relief programs.

Detail: Detailed or General Language

Of the eight policies evaluated, half were categorized as using detailed language while the other half used general language. Only three of the five municipalities that included tenant protection had at least one detailed policy. These policies often lacked the *when* conditional marker to indicate the time periods or conditions where the policy will occur.

Alignment with HB 1220

As described above, advancing tenant protection helps prevent displacement and addresses racially disparate impacts in housing, as required by HB 1220. Kent's policy SPO1-6 stands out as a best practice in this matter due to their use of directive language, specifically through the word leverage, which mandates the use of existing resources that aid in displacement prevention through tenant protection. This policy is also action-oriented, directly linking the aid in displacement prevention to the application of tenant protections such as foreclosure assistance, legal aid, and tax relief programs. Lastly, it is also detailed as it specifies who (the city) will do what (aid in displacement prevention), why (to prevent displacement), and how (through foreclosure assistance, legal aid, and tax relief programs).

Kent
Policy SPO1-6 *Leverage existing resources that aid in displacement prevention and proactively disseminate that information to residents, including but not limited to foreclosure assistance, legal aid, and tax relief programs.⁹⁵*

Kirkland also has a policy that uses directive language, implying accountability, that is action-oriented and detailed addressing displacement by adopting tenant protections such as relocation assistance. It can be seen in **Appendix D**, and was noteworthy as the only other tenant protection policy to be classified as sufficiently detailed.

Comparative Analysis

Kirkland and Kent, both classified as high-population municipalities in this study, stand out for including accountable, action-oriented, and detailed tenant protection policies, despite differing in their levels of displacement risk and racial/ethnic diversity. Along with Tacoma, these three high-population cities included such policies. In contrast, the four municipalities that did not include tenant protection policies represent a range of profiles. Marysville and University Place, which did not include such policies, are

⁹⁵ "Kent Housing Options Plans," City of Kent, June 2021. 95.
<https://www.kentwa.gov/departments/econ-community-dev/kent-housing-options-plan>

among the three municipalities in this study with the lowest displacement risk values. However, Port Orchard also did not include tenant protections, despite having a moderate-to-high level of displacement risk.

5.1.1 Tenant Protection Summary

- **Advancing tenant protection** is critical to preventing displacement and addressing racially disparate impacts, making it an essential element of a comprehensive housing strategy, as required under HB 1220.
- **Only five of the nine municipalities evaluated have adopted policies that address tenant protections**, based on:
 - **Accountability:** All eight tenant protection policies identified use directive language, signaling a strong commitment to action through verbs such as expand, implement, adopt, and advance.
 - **Orientation:** All policies are action-oriented, with clear links between goals such as displacement prevention or housing stability and the means to achieve them.
 - **Detail:** Only half of the policies reviewed include sufficient detail to clearly guide implementation.
- **Kent** policy SPO1-6 stands out for linking tenant protections to displacement prevention through the leveraging of existing resources and proactive information dissemination. This policy is directive, action-oriented, and detailed.
- **Kirkland** also has a strong policy using directive, action-oriented language, focusing on displacement prevention through measures such as relocation assistance.
- **Key takeaway:** Only about half of the comprehensive plan reviewed included policies regarding tenant protection. Most of them demonstrated clear intent and action-orientation, but their potential effectiveness is likely to be undermined by a lack of detail.

5.1.2 Increasing Homeownership

Renters are much more likely than homeowners to be displaced.⁹⁶ The region's high housing prices exclude many low- to moderate-income households from homeownership. This issue is exacerbated by the absence of moderate-density housing, which is a symptom of exclusionary zoning policies targeting low-income households, and further underscored by racially disparate homeownership rates, which are the result of historic discrimination and ongoing differences in opportunity access for People of Color, particularly Black and Indigenous people.

⁹⁶ Puget Sound Regional Council, "Who's Affected by Housing Displacement?". 2019. <https://www.psrc.org/media/4916>

Table 2 illustrates the homeownership rates of the ten municipalities selected for this analysis. On average, nearly half of renters in these municipalities spend over 30% of their household income on housing.⁹⁷ In comparison, an average of nearly one in four homeowners in these municipalities spend over 30% of their income on housing.⁹⁸ This illustrates three major points: Homeowners are likely to be high-income earners compared to renters; renters are unable to save for the purchase of a home; and housing costs continue to be a challenge for many Puget Sound homeowners.

It is clear that municipalities recognize homeownership as an important tool to address displacement, exclusion, and racially disparate impacts – all nine comprehensive plans in this analysis included policies to increase homeownership. These policies were evaluated for accountability, orientation, and detail as described earlier in this paper.

Table 2: Homeownership Rates⁹⁹

City	County	% Own	% Rent
Bainbridge Island*	Kitsap	80.90%	19.10%
Kent	King	55.20%	44.80%
Kirkland	King	62.20%	37.80%
Lakewood	Pierce	43.20%	56.80%
Lynnwood	Snohomish	53.00%	47.00%
Marysville	Snohomish	70.20%	29.80%
Port Orchard	Kitsap	60.10%	39.90%
Tacoma	Pierce	53.60%	46.40%
Tukwila	King	38.60%	61.40%
University Place	Pierce	58.50%	41.50%
All Puget Sound Region		60.70%	39.30%
*Bainbridge did not have a comprehensive plan available for review at the time of this report.			

Accountability: Directive or Suggestive Language

Eight of the nine municipalities used directive, accountable language in at least one of their policies to increase homeownership. Several policies included specific actions, such as disseminating information on homeownership programs, or gave examples of specific programs, such as downpayment assistance, home improvement loans, and eviction prevention. A total of 17 policies were identified, with only seven of those policies using suggestive language. A majority of policies using suggestive language indicated support for homeownership opportunities for low-income communities and communities of color without a mechanism of action. Additionally, many policies included support for moderate-density housing or alternative housing models, with various degrees of directive language.

Orientation: Action-Oriented or Outcome-Oriented Language

Of the 17 policies evaluated, nine used action-oriented language, while eight used outcome-oriented language. Outcomes often focused on increasing homeownership for target groups, such as low-income households, first-time homebuyers, and communities of color. Municipalities reinforce these outcomes

⁹⁷ Ibid.

⁹⁸ Ibid.

⁹⁹ Puget Sound Regional Council, "Community Profiles Dashboard." 2022. <https://psrcwa.shinyapps.io/community-profiles/>

with a variety of actions, including moderate-density housing, alternative housing models, disseminating information, and advocating for additional funding. Only one city did not have any policies with a mechanism of action – that municipality indicated support for alternative housing models to lower barriers to ownership, but no mechanism of action was identified for how they would support alternative models.

Detail: Detailed or General Language

Eight of the nine municipalities had at least one individual policy with a sufficient level of detail. Most policies did not specify the *how* of the policy, and the authors also identified challenges with *where* within the city the policy would occur. For example, *where* support and encouragement would occur or *where* moderate-density and alternative housing models would be allowed was not often stated explicitly.

Alignment with HB 1220

As described earlier, increasing homeownership addresses exclusion, displacement, and RDI in housing as mandated by HB 1220. Only one policy, Port Orchard, explicitly addressed the largest barrier that municipalities may face when implementing programs to increase homeownership: funding.

Port Orchard Policy HS- 25

*Advocate for additional funding at County, Federal, State, and other levels to expand programs that: facilitate home ownership for low- to moderate-income resident, prevent, avoidable, involuntary evictions and foreclosures, and provide assistance for repair, rehabilitation, energy efficiency, and weatherization.*¹⁰⁰

Port Orchard is the only municipality to direct advocacy as an action to address homeownership. There is a clearly identified outcome: secure additional funding to expand programs. This policy also has a strong level of detail. Homeownership for low- to moderate-income residents will be facilitated when additional funding is secured, and this funding will also be used to prevent evictions and provide assistance for home repairs, etc. The policy does not specify *how* Port Orchard will advocate to various governments, leaving room for the city to determine those details during implementation.¹⁰¹

Other cities have policies that target new homeowners more specifically. Kent, Tacoma, and Lakewood all have policies that specifically mention first-time homeowners. All cities included policies to increase the supply of housing that alluded to increasing opportunities for new homeowners. Tacoma included an outcome-oriented policy to increase racial diversity in high-opportunity neighborhoods, which addresses the overrepresentation of BIPOC communities in low-opportunity neighborhoods, a racially disparate impact. Fully addressing RDI includes increasing opportunities for residents regardless of neighborhood. This ensures that housing policy does not perpetuate exclusion. Lakewood targets Tillicum-Woodbrook, a neighborhood with limited economic opportunity that is geographically separated from the rest of the city, as somewhere they will provide information on homeownership programs for veterans, first-time homebuyers, and residents with disabilities.

Comparative Analysis

Cities with higher levels of displacement risk appear more likely to have accountable, action-oriented, and detailed homeownership policies than cities with lower levels of displacement risk. For example, Kirkland, Marysville, and University Place (with low risk levels) had policies which encouraged building a variety of housing types. The other cities in this analysis included policies on outreach and support for homebuyers,

¹⁰⁰ "City Comprehensive Plan," City of Port Orchard, December 2024. 3-17. <https://portorchardwa.gov/city-comprehensive-plan/>

¹⁰¹ Advocacy may be most effective when combined with other policies. The authors did not identify any other policies to address homeownership in Port Orchard.

particularly low-income households, people of color, and first-time homebuyers. These cities also had policies to encourage building a variety of housing types – but cities with moderate or high levels of displacement risk are recognizing the need for people-oriented homeownership policies in conjunction with policies to increase supply.

5.1.2 Increasing Homeownership Summary

- **Homeowners are less likely to be displaced**, and targeted homeownership programs can address exclusion and racially disparate impacts.
- **All nine municipal comprehensive plans evaluated include policies to increase homeownership**, based on:
 - **Accountability**: Most policies direct specific actions (e.g., down payment assistance), but many lack implementation mechanisms.
 - **Orientation**: Municipalities use a mix of action- and outcome-oriented language; only one city had no action-oriented policies.
 - **Detail**: About half of policies have sufficient detail, but many do not specify *how* or *when* they will be implemented.
- **Port Orchard’s plan** stands out by including advocacy for funding to support homeownership, eviction prevention, and housing repairs.
- **Kent, Tacoma, Lakewood** have policies to target first-time buyers. **Tacoma** also aims to increase racial diversity in high-opportunity areas, and **Lakewood** targets specific groups in the Tillicum-Woodbrook neighborhood.
- **Key takeaway**: Municipalities recognize homeownership as an important tool for addressing displacement, exclusion, and racially disparate impacts. However, policies are limited by their accountability language and the level of generality in their action mechanism.

5.1.3 Exclusion

Exclusionary practices in housing prevent certain population groups from residing in a particular area due to unreasonable financial barriers or a lack of diversity in housing types. Exclusion can occur as an indirect effect of local input and public engagement. In many cities, local opposition to new housing and rezoning exists and the outcomes of public engagement on rezonings have led to fewer housing units with more square footage.¹⁰² This phenomenon needs to be taken into account when engaging communities and writing policies to expressly combat exclusion. The Washington Department of Commerce presents examples of how to combat exclusion through housing element policies such as revising zoning standards and development regulations which were used by the municipalities in this study.¹⁰³

¹⁰² Whittemore, A. H., & BenDor, T. K. (2019). Opposition to housing development in a suburban US County: Characteristics, origins, and consequences. *Land Use Policy*, 88, 104158-. <https://doi.org/10.1016/j.landusepol.2019.104158>

¹⁰³ Washington Department of Commerce. (2023, August 23). *Guidance for updating your housing element*. <https://deptofcommerce.app.box.com/s/1d9d5l7g509r389f0mjpowh8isjpirlh>

Upzoning is the practice of increasing the maximum allowable density in a city or neighborhood. For example, upzoning a neighborhood that previously only allowed single-family homes would mean changing zoning laws to allow for multi-family housing or middle-density development such as townhomes and duplexes. In 2023, the Washington State Legislature passed HB 1110, which required all municipalities planning under the GMA to upzone. This legislation required all cities in this analysis to revise their zoning laws, and eliminated single-family home zoning in most neighborhoods. While it is too early to be certain, this legislation should significantly reduce exclusion as denser and more affordable housing options are allowed to be built across the region. In addition, much of the work that cities have done to address and undo exclusion occurs within their zoning code updates. This analysis only looks at policies that address exclusion, as required by HB 1220, outside of the mandated zoning code updates, as required by HB 1110.

Accountability: Directive or Suggestive Language

Ten of twelve identified policies used directive language. The two municipalities that used suggestive language mentioned considering or reviewing zoning updates for the city. These types of policies do not mandate specific action that can bring about change. The municipalities that used directive language actively used verbs to mandate specific new or continued action to combat exclusion.

Orientation: Action-Oriented or Outcome-Oriented Language

Nine of twelve identified policies used action-oriented language to varying degrees. Some municipalities specified the specific programs and areas in which action needed to take place, while others used action-oriented language with no accompanying direction. Kirkland went a step further and pointedly laid out the priority areas for removing exclusionary regulations and reviewing processes from zoning code.

Kirkland Policy H-2.27

*Ensure equitable distribution of more housing types by removing exclusionary regulations and review processes from the zoning code. Prioritize removing regulatory and permitting barriers that prevent moderate-intensity residential development in lower-intensity neighborhoods.*¹⁰⁴

Detail: Detailed or General Language

Nine of twelve identified policies used detailed language. The three municipalities that used general language were the only three that mentioned inclusionary zoning. The term “inclusionary zoning” as defined by PSRC¹⁰⁵ has a complex meaning and built in actions among city planners, but may not be detailed enough to make sense to the average community member.

Alignment with HB 1220

The alignment with the mandate of HB 1220, passed in 2021, to implement policies that mitigate exclusion can be overshadowed by the mandate for changes in the zoning code by HB 1110 which passed in 2023. Most municipalities mentioned increasing density and expanding capacity in low-density residential neighborhoods. Tacoma’s policies stand out by preserving housing opportunities for low-income residents in high-opportunity areas.

¹⁰⁴ “Kirkland 2044 Comprehensive Plan,” City of Kirkland, December 2024, 11.

<https://www.kirklandwa.gov/Government/Departments/Planning-and-Building/Planning-Projects/Kirkland-2044-Comprehensive-Plan-Update/The-Basics/Comprehensive-Plan-by-Section>

¹⁰⁵ Puget Sound Regional Council. (n.d.). *Inclusionary Zoning*. <https://www.psrc.org/media/2037>

Tacoma
Policy H-4.4

Preserve affordable homeownership and housing stability for low-income renters in high-opportunity areas through actions such as home improvement loans, down payment assistance, subsidized utility rates, and others.¹⁰⁶

This policy delineates specific actions such as home improvement loans, down payment assistance, and subsidized utility rates while expressing the desired outcome of preserving affordable homeownership and housing stability. These are the types of policies that align with the HB 1220 goal to undo exclusionary policies through active programming and policymaking.

Comparative Analysis

When comparing municipalities by population size, displacement risk, and racial/ethnic diversity, no remarkable variation existed.

5.1.3 Exclusion Summary

- **Exclusion can occur lawfully**, therefore it needs to be actively combated.
- **All nine municipalities published twelve policies to mitigate exclusion**, based on:
 - **Accountability**: Ten policies used directive language.
 - **Orientation**: Nine policies used action-oriented language, but to varying degrees.
 - **Detail**: Nine policies used detailed language, while the general policies all mentioned “inclusionary zoning”.
- **Kirkland’s comprehensive plan** detailed priority areas for the specific actions of removing exclusionary regulations and reviewing processes from zoning code
- **Tacoma’s plan** stands out for its inclusion of a policy to help low-income residents reside in high-opportunity areas, in contrast to the policies in most comprehensive plans which changed housing density.
- **Key takeaway**: All municipalities understand the need to prevent exclusionary practices in housing, but using the term “inclusionary zoning” without further definition can lead to policies that lack actionable detail.

5.1.4 Racially Disparate Impacts

Municipalities cannot publish policies that implement racially disparate treatment, but even well-written and well intentioned policies can result in racially disparate impacts. In 1968, the Fair Housing Act made denial of access to housing based on race and color illegal, but legal, fiscal zoning policies in the latter half of the 20th century led to the development of larger, affluent single-family housing communities that created socioeconomic and racial segregation in U.S. municipalities.¹⁰⁷ In addition, policies with language

¹⁰⁶ “One Tacoma: Comprehensive Plan,” City of Tacoma, 2025. 71.

<https://tacoma.gov/government/departments/planning-and-development-services/long-range-strategic-plans/comprehensive-plan/>

¹⁰⁷ Housing Affordability Institute. (2021). History of Exclusion in America’s Housing Policies.

https://www.housingaffordabilityinstitute.org/wp-content/uploads/2024/05/Ex_Zoning_History_Print.pdf

such as “maintain the character of established single-family neighborhoods” and similar zoning practices can lead to racial segregation and unintended racially disparate outcomes.¹⁰⁸ To address and undo racially disparate impacts through policymaking, municipalities need to take an active and intentional stance.

Accountability: Directive or Suggestive Language

Thirteen of seventeen policies identified in the comprehensive plans used directive language to help mitigate racially disparate impacts. Municipalities that used suggestive language addressed the need to engage with BIPOC community members and recognize racially disparate impacts, but did not mandate subsequent action or implementation. Moreover, some suggestive language included the use of the phrase “to the extent feasible” which allows cities to not implement the policy in its entirety or at all.

Orientation: Action-Oriented or Outcome-Oriented Language

Five of the 17 identified policies used action-oriented language. Actions delineated through these policies included promoting access to homeownership opportunities, removing policies that exacerbate racially disparate impacts, and establishing relationships with community stakeholders to better understand the effect of policies on people of color. Specific, action-oriented policies to address and undo racially disparate impacts may have been less prevalent among RDI policies due to the large scale of racially disparate impacts and the relative newness of the concept in the field of city policymaking.

Detail: Detailed or General Language

Five of seventeen identified policies used detailed language. Similarly to the relative paucity of using action-oriented language, the use of detailed language was sparse in the review of municipalities’ policies. The authors’ review of the comprehensive plans and interviews with city planners suggests that the use of general language in the majority of policies that mitigate racially disparate impacts is unsurprising. Guidance for writing such policies came later into the process when city planners were already inundated with keeping up with other state policymaking mandates prior to the December 2024 deadline.

Alignment with HB 1220

HB 1220 mandates municipalities to “identify local policies and regulations that result in racially disparate impacts” and “address and begin to undo racially disparate impacts”.¹⁰⁹ Kent’s policy recognizes the need to collaborate with other entities to begin to undo racially disparate impacts.

Kent Policy H-5.6

Collaborate with other local, regional, and statewide entities to monitor success and progress of incentives, initiatives, and development and to ensure policies are working as intended to address racially disparate impacts, displacement risk, and 20-year population allocations. Amend strategies and actions as needed based on monitoring outcomes.¹¹⁰

The policy identifies the need to monitor policies and their possible unintended impacts on vulnerable populations and communities of color. In addition, the policy goes further than addressing the impact and mandates amendment of strategies and actions to properly address racially disparate impacts.

¹⁰⁸ Washington Department of Commerce. (2023, April 25). Guidance to address racially disparate impacts. <https://deptofcommerce.app.box.com/s/11217198jattb87qobtw63pkplzhxege>

¹⁰⁹ Wash. Legis. Assemb. HB 1220. Reg. Sess. 2021-2022 (2021).

<https://app.leg.wa.gov/bills/summary?Year=2021&BillNumber=1220>

¹¹⁰ “2044 Kent Comprehensive Plan,” City of Kent, December 2024. 100 <https://engage.kentwa.gov/futurekent>

Comparative Analysis

Two of the cities with the largest communities of color and highest displacement risk, Kent and Tukwila, added policies that aligned with HB 1220 with directive, action-oriented, and detailed language. No other significant patterns existed among cities of different sizes or displacement risks.

5.1.4 Racially Disparate Impacts Summary

- **Racially disparate impacts can occur unintentionally**, therefore intentional policymaking must occur to mitigate it.
- **All nine municipalities published a total of 17 policies aimed at addressing racially disparate impacts**, based on:
 - **Accountability**: Thirteen policies used directive language and acknowledged a need to mandate action to combat racially disparate impacts.
 - **Orientation**: Five policies specified the actions required to mitigate racially disparate impacts such as promoting access to homeownership, removing harmful policies, and establishing relationships with communities of color.
 - **Detail**: Five contained language detailed for implementation.
- **Kent's comprehensive plan** stands out through its alignment with HB 1220 by addressing and undoing policies that exacerbate racially disparate impacts
- **Key takeaway**: Most municipalities used general language rather than specific, action-oriented policies to address and undo racially disparate impacts. This may be due to the large scale of racially disparate impacts and the relative newness of the concept in the field of municipal policymaking.

5.1.5 Emergency Housing

Emergency housing is a crucial component of the broader effort to address homelessness and housing instability. It refers to temporary accommodations provided to individuals and families who have lost their housing or are in crisis and have no safe place to stay. These facilities may include shelters, transitional housing, tiny house villages, converted hotels, or other short-term solutions designed to meet urgent needs. The purpose of emergency housing is not only to offer a roof over one's head but also to serve as a launching point toward stability. Most emergency housing programs include access to support services such as case management, mental health care, employment resources, and pathways to permanent housing.

The importance of emergency housing lies in its ability to provide immediate relief and safety while preventing further descent into chronic homelessness. For many, this intervention represents a critical turning point—a place to stabilize, regroup, and begin to rebuild their lives with dignity and support. Effective emergency housing can also ease the burden on other public systems, such as hospitals and law enforcement, by offering proactive, community-based solutions to a growing crisis.

Throughout the Puget Sound Region, these nine cities have responded in varied ways to the challenge of homelessness. While the scale and type of emergency housing differ from city to city, the shared goal is to provide compassionate, practical solutions that meet the immediate needs of vulnerable residents.

These efforts reflect a regional understanding that access to safe, temporary housing is a foundational step in ending homelessness.

Accountability: Directive or Suggestive Language

Eight out of the nine comprehensive plans analyzed incorporated directive language in their comprehensive plans when addressing emergency housing, offering a clear explanation of their intended strategies. The use of decisive, action-oriented terms such as allow, collaborate, coordinate, maintain, and monitor reflects a deliberate effort to move beyond general aspirations toward actionable commitments. When paired with clearly defined steps, this type of language establishes a structured path for policy implementation, making it easier to track progress, ensure accountability, and ultimately deliver meaningful solutions to emergency housing challenges.

Orientation: Action-Oriented or Outcome-Oriented Language

Seven out of the nine comprehensive plans analyzed utilized action-oriented language in outlining their policy approaches to emergency housing, signaling a strong intent to move from planning to implementation. By articulating specific actions—such as expanding shelter capacity, coordinating with service providers, or streamlining permitting processes—these cities not only clarify what they intend to do, but also provide insight into why these actions are necessary and how they will be carried out. This level of specificity enhances transparency, facilitates accountability, and increases the likelihood of meaningful progress in addressing emergency housing needs.

Detail: Detailed or General Language

Detailed, action-oriented language plays a critical role in transforming emergency housing strategies from abstract goals into tangible outcomes. In the analysis, seven of the nine cities reviewed employed precise and actionable terminology in their policy documents, demonstrating a clear commitment to implementation rather than mere planning. By specifying concrete steps—such as increasing shelter capacity, forming partnerships with service providers, or expediting approval processes—these cities not only outline what they plan to do, but also illuminate the rationale behind these actions and the mechanisms by which they will be executed.

Alignment with HB 1220

The policy approaches adopted by cities in the Puget Sound Region show strong alignment with the intent and requirements of HB 1220, which mandates that municipalities plan for and accommodate the housing needs of all economic segments, including those experiencing homelessness. HB 1220 emphasizes the importance of proactive, inclusive planning and directs local governments to remove barriers to emergency housing, transitional housing, and permanent supportive housing through their comprehensive plans and development regulations.

Kirkland Policy H-2.29

Monitor the city's progress towards eliminating disparities in access to housing and neighborhood choices and meeting the allocated housing targets by income segment and emergency housing through the city's housing dashboard, annually reporting the city's progress to the King County Growth Management Planning Council, and making the necessary policy, program, or regulatory adjustments to achieve housing equity, access, and supply.¹¹¹

¹¹¹ "Kirkland 2044 Comprehensive Plan," City of Kirkland, December 2024, 11.
<https://www.kirklandwa.gov/Government/Departments/Planning-and-Building/Planning-Projects/Kirkland-2044-Comprehensive-Plan-Update/The-Basics/Comprehensive-Plan-by-Section>

Comparative Analysis

Through comparative analysis, no major similarities or significant patterns emerged on policy approach among the nine municipalities.

5.1.5 Emergency Housing Summary

- **Emergency housing** provides temporary accommodations for individuals and families in crisis who lack safe, stable shelter, serving as an essential first response to homelessness and housing instability.
- **All nine municipalities analyzed** included policies addressing emergency housing in their comprehensive plans, demonstrating a regional commitment to supporting individuals and families experiencing homelessness.
- **Kirkland's Policy H-2.29** highlights the importance of **tracking progress on emergency housing** by using a housing dashboard and annual reporting to the King County Growth Management Planning Council, ensuring the city can identify disparities, measure outcomes, and make timely policy or regulatory adjustments to better meet housing equity and supply goals.

5.1.6 Emergency Shelters

Emergency shelters are an essential element in the network of services that support individuals and families experiencing homelessness. These facilities offer short-term, immediate accommodation for those who have nowhere else to go, especially during moments of acute crisis—whether due to economic hardship, eviction, domestic violence, or other emergency situations. Unlike transitional or permanent housing, emergency shelters are designed to address urgent, temporary needs, often operating on a nightly or short-term basis.

The primary role of emergency shelters is to provide a safe, stable environment where people can rest, access basic necessities such as food, hygiene, and weather protection, and can begin connecting with services that can support their recovery or transition. Many shelters also offer case management, referrals to health and mental health services, and assistance in securing long-term housing. Some operate year-round, while others may be seasonal or activated during extreme weather events, such as winter cold snaps or summer heat waves.

Emergency shelters are a vital safety net within communities, often serving as the first point of contact for people entering the homelessness response system. They help prevent further exposure to the elements, reduce harm, and offer a space for people to begin addressing the root causes of their housing instability. In doing so, shelters also contribute to broader public health and safety efforts by reducing the number of people sleeping outdoors or in unsafe conditions.

Across the Puget Sound region, cities have approached emergency shelter needs in different ways, adapting to the scale of local demand and available resources. Some cities operate traditional congregate shelters, while others have embraced alternatives like tiny house villages, modular units, or hotel-based

shelters. Though strategies vary, the shared goal remains the same: to offer compassionate, immediate care and a stepping stone toward long-term stability.

Accountability: Directive or Suggestive Language

All nine comprehensive plans analyzed incorporate some form of directive language, which is significant because such language tends to translate policy intentions into concrete steps. This use of clear, action-oriented phrasing increases the likelihood that municipalities will implement specific measures to address emergency shelter needs, as opposed to merely expressing general support or aspirational goals.

Orientation: Action-Oriented or Outcome-Oriented Language

Each of the nine comprehensive plans employs some form of directive language, reinforcing their commitment to achieving clearly defined outcomes. By using action-oriented terms such as *allow*, *coordinate*, *develop*, *partner*, and *plan*, these cities move beyond vague intentions and instead articulate the specific steps they intend to take. This deliberate choice of language not only signals a stronger commitment to addressing emergency shelter needs, but also provides a clearer roadmap for implementation, accountability, and progress tracking.

Detail: Detailed or General Language

Across all nine comprehensive plans analyzed, the use of detailed and directive language signals a meaningful shift from general policy statements to clearly articulated strategies. Rather than relying on broad, aspirational goals, cities are adopting specific, action-oriented terminology—such as *allow*, *coordinate*, *develop*, *partner*, and *plan*—that lays out concrete steps for addressing emergency housing needs. This level of detail is not just a matter of semantics; it has a direct impact on policy implementation and effectiveness. Detailed language serves several key functions. First, it clarifies intent, ensuring that city staff, stakeholders, and community members understand exactly what actions are being proposed. Second, it facilitates accountability by making it easier to evaluate whether policies are being carried out as planned. Lastly, it supports adaptability, allowing cities to track progress, identify gaps, and make informed adjustments based on real-time data and outcomes—such as those tracked through tools like Kirkland’s housing dashboard. By embedding specificity into their plans, these municipalities are not only complying with legislative expectations like those outlined in HB 1220, but also strengthening their ability to respond effectively and equitably to the urgent need for emergency housing.

Alignment with HB 1220

The emergency housing policies adopted by the nine Puget Sound cities demonstrate strong alignment with the goals and requirements of HB 1220. This legislation requires municipalities to plan for and accommodate the housing needs of all economic segments of the population—including those experiencing homelessness—through their comprehensive plans. HB 1220 also directs local governments to reduce barriers to emergency shelters, transitional housing, and permanent supportive housing, with a particular focus on advancing housing equity and addressing disproportionate impacts on historically marginalized communities.

All nine municipal comprehensive plans analyzed have included steps consistent with these mandates by incorporating directive, action-oriented, and detailed language. Each city included policies explicitly addressing emergency shelter, signaling not only a regional recognition of the urgent need for short-term housing but also a commitment to implementing real solutions. The use of strong, directive terms such as *allow*, *coordinate*, *develop*, *partner*, and *plan* moves these policies beyond general support and into the realm of actionable commitments.

Kent | *Allow for development of indoor emergency facilities in all zones where hotels are allowed through clear and objective standards that are consistent with state law.*¹¹²

Policy H-2.8

Comparative Analysis

Through comparative analysis, no major similarities or significant patterns emerged on policy approach among the nine municipalities.

5.1.6 Emergency Shelters Summary

- **Emergency shelters** provide short-term, immediate accommodations for individuals and families in crisis—such as those facing eviction, economic hardship, or domestic violence—and serve as a critical first response to urgent, temporary housing needs.
- **All nine comprehensive plans analyzed** include policies explicitly addressing emergency shelter and use directive, action-oriented, and detailed language—such as *allow*, *coordinate*, *develop*, *partner*, and *plan*—demonstrating a regional commitment to implementing concrete, actionable solutions to urgent housing needs.
- **Kent’s Policy H-2.8** is a concrete and specific measure to expand emergency shelter capacity by **allowing indoor emergency facilities in all zones where hotels are permitted**, using clear and objective standards in alignment with state law—removing zoning barriers and enabling more flexible, site-ready shelter development.

¹¹² “2044 Kent Comprehensive Plan,” City of Kent, December 2024. 96 <https://engage.kentwa.gov/futurekent>

5.2 Production Policies

As mentioned in Chapter 4, production-focused policies aim to expand the housing supply in response to growing demand across Puget Sound cities, ensuring the availability of affordable housing for all income levels in alignment with the goals of HB 1220. These policies aim to achieve housing abundance, the condition where the supply of housing meets or exceeds demand, making housing more accessible and affordable. Achieving housing abundance requires the use of multiple tools like encouraging the development of Accessory Dwelling Units (ADUs), expanding tax incentive programs for housing construction, removing excessive regulatory barriers, and promoting innovative housing models such as co-housing and cooperatives. Additional tools include implementing affordable housing requirements for new developments, securing funding for subsidized housing, and fostering mixed-income communities (Table 3).

Table 3. Classification of production policy categories under study within the Comprehensive Plans.

Classification	Policy Category	Objective	Criteria
Production	Accessory Dwelling Units (ADU)	Displacement/ Exclusion	Does the plan include policies to encourage ADUs through zoning changes?
	Tax Incentive Programs	Displacement/ Exclusion	Does the plan include policies to establish or expand tax incentive programs to encourage housing development?
	Regulatory Barriers	RDI/ Exclusion	Does the plan include strategies to identify and remove excessive regulatory barriers to housing production?
	Alternative Housing Models	RDI/ Exclusion	Does the plan include policies to promote alternative housing models such as co-housing, housing cooperatives, co-living buildings?
	Affordable Housing Requirements	RDI/ Exclusion	Does the plan include affordable housing requirements for new housing developments?
	Subsidized Housing Funding Sources	Displacement/ RDI/ Exclusion/	Did the plan include subsidized housing funding sources?
	Zoning	Displacement/ RDI/ Exclusion/	Did the plan update the zoning map with an increased detail for zoning designations which allow for a larger variety of housing types?
	Mixed-Income	Displacement/ RDI/ Exclusion/	Does the plan promote mixed-income housing developments and neighborhoods?

5.2.1 Strategies to Identify and Remove Excessive Regulatory Barriers

Ensuring housing abundance requires policies that actively promote the expansion of supply. One key strategy towards this goal is the identification and removal of regulatory barriers that restrict new housing development¹¹³. Policies under this strategy can pursue this objective by reviewing zoning codes to eliminate unnecessary obstacles and encourage innovation in design and construction, aligning

¹¹³ Gyourko, J., & Molloy, R. (2015). Regulation and housing supply. In G. Duranton, J. V. Henderson, & W. C. Strange (Eds.), *Handbook of regional and urban economics* (Vol. 5, pp. 1289–1337). Elsevier. <https://doi.org/10.1016/B978-0-444-59531-7.00019-3>

development regulations with current market conditions, encouraging flexibility in development standards and site design, streamlining permitting processes to minimize development costs, and reviewing building and fire codes to identify opportunities for reducing building cost among other possibilities.

Accountability: Directive or Suggestive Language

A total of twelve policies referring to identifying and removing excessive regulatory barriers in terms of housing production were identified with seven out of the nine municipalities under study having at least one policy referring to this topic. Except for one policy, all of them use directive language including verbs such as "review", "adopt", "ensure", and "identify".

Orientation: Action-Oriented or Outcome-Oriented Language

All of the twelve policies evaluated used action-oriented language. Outcomes such as reducing the cost of building and stimulating the production of diverse types of housing, minimizing holding costs and encourage housing production, or reducing building costs and improving the efficiency of development, were linked to a variety of actions, including adopting development and environmental regulations; ensuring streamlined, timely, and coordinated processing of residential projects; or reviewing building and fire codes.

Detail: Detailed or General Language

Of the twelve policies evaluated, eleven can be categorized as using detailed language while only one is categorized as using general language. Six of the seven municipalities including policies to identify regulatory barriers had at least one policy with a sufficient level of detail.

Alignment with HB 1220

As described above, removing excessive regulatory barriers is helpful in ensuring the availability of affordable housing options for all economic segments of the population, as mandated by HB 1220. Kent's policies H-4.1 and H-4.3 stand out as best practices in this matter due to their use of directive language, specifically through the use of verbs such as identify and remove, which are used to mandate action towards constraints or barriers that may hinder the development, or ensure, which is used to mandate action regarding a streamlined processing of residential projects. These policies are also action-oriented, directly linking the outcomes such as ensuring development of diverse, affordable, and accessible housing supply to the regulatory reviews proposed. Lastly, these policies are also detailed as they specify *who* (the city) will do *what* (review development standards, ensure streamlined, timely, and coordinated processing of residential projects), *why* (to minimize holding costs and encourage housing production; to identify and remove constraints or barriers that may hinder the development), and *when* (regularly, continuously).

Kent Policy H-4.1	<i>Regularly review development standards and processes to identify and remove constraints or barriers that may hinder the development of diverse, affordable, and accessible housing supply, especially for lower-income households. Allow more flexibility to encourage compact infill development and innovative site design.¹¹⁴</i>
Policy H-4.3	<i>Ensure streamlined, timely, and coordinated processing of residential projects to minimize holding costs and encourage housing production.</i>

¹¹⁴ "2044 Kent Comprehensive Plan," City of Kent, December 2024. 98 <https://engage.kentwa.gov/futurekent>

*Continuously explore and implement further process improvements as necessary.*¹¹⁵

Kirkland also has a set of policies worth highlighting that use directive language, implying accountability, that are action-oriented and detailed to promote housing production by reducing the cost of building diverse types of both market rate and affordable housing by speeding up and simplifying the permitting process.

Comparative Analysis

Kent and Lakewood, both ranked among the three municipalities with the highest displacement risk, included policies regarding eliminating regulatory barriers to housing production that are accountable, action-oriented, and detailed policies. On the other hand, Marysville and University Place, the two cities that omitted such policies, are among the three municipalities under study with the lowest displacement risk values.

5.1.2 Strategies to Identify and Remove Excessive Regulatory Barriers Summary

- Promoting housing production by **identifying and removing excessive regulatory barriers** is essential to increasing housing supply and affordability, thereby ensuring housing abundance and preventing exclusion, as mandated by HB 1220.
- **Seven of the nine municipalities evaluated have adopted policies aimed at reducing regulatory barriers on housing production**, based on:
 - **Accountability:** Eleven out of twelve policies use directive language, employing verbs such as “review,” “adopt,” “ensure,” and “identify,” demonstrating a clear commitment to action.
 - **Orientation:** All policies are action-oriented, with defined steps intended to reduce development costs, expedite timelines, and encourage the production of diverse housing types.
 - **Detail:** Only one of the policies remains general, omitting important elements.
- **Kent** stands out through policies H-4.1 and H-4.3, which use directive, action-oriented, and detailed language to promote housing production. These policies mandate the regular review of development standards to remove barriers and ensure a streamlined permitting process that reduces holding costs and encourages diverse, affordable housing supply.
- **Kirkland** also presents a strong example, with policies that clearly link regulatory streamlining and cost reduction to housing outcomes.
- **Key takeaway:** Most municipalities recognize the importance of housing production to address affordability and meet demand, and many have taken initial steps to remove regulatory barriers.

¹¹⁵ “2044 Kent Comprehensive Plan,” City of Kent, December 2024. 98 <https://engage.kentwa.gov/futurekent>

5.2.2 Promote Alternative Housing Models

Alternative housing models are a way to promote housing for low and moderate-income families to be able to own a home. These models offer long-term housing affordability to families who would otherwise be unable to afford a home through various financial schemes to offset the market costs of high-density smaller housing options for individuals and families.¹¹⁶ Alternative housing models are a key way of addressing the HB 1220 mandate for increasing the number of affordable housing options by providing alternative homeownership options to lower and middle-income families. Additionally, they are intentionally community-centered in their design and function, increasing social cohesion. The following alternative housing models were mentioned within at least one of the selected cities' comprehensive plans:

- Co-housing is a collaborative housing development that is designed to foster community. It is traditionally set up as a condominium whereby individuals have their own private homes but share common facilities.¹¹⁷
- Community Land Trusts (CLT) are nonprofits that enable participants to own the physical structure of their home but not the underlying land, which they then lease from the CLT. Then, when the homeowner decides to sell, the CLT either repurchases the home at or below market price or requires the owner to sell to another income-eligible household.¹¹⁸
- Housing Co-operatives are corporations in which residents buy a low-cost share of the ownership of a building but receive a limited return when it is resold.¹¹⁹

Six out of the nine municipalities include specific policies to promote alternative housing models to increase housing options for all income levels, helping to mitigate exclusion and RDI as mandated in HB 1220.

Accountability: Directive or Suggestive Language

Seven out of the nine policies municipalities included about alternative housing models used suggestive language, such as “explore” or “encourage”, implying aspiration toward the policy goal but not actionable steps.

Did You Know?

In 2022, Newark, CA published a policy that used directive language to create larger housing units for larger families.

Newark Policy 4.1.3 | *Include bigger housing units in new developments to accommodate large families of different cultures*¹²⁰

Newark acknowledged the severe need for affordable housing, but their housing needs analysis showed a higher need for 2+ bedroom units, therefore the City provides a public subsidy for developers

¹¹⁶ Puget Sound Regional Council, “Alternative Homeownership Models,” June 2023, <https://www.psrc.org/media/2021>

¹¹⁷ Jerome L. Garciano, “Affordable cohousing: Challenges and opportunities for supportive relational networks in mixed-income housing,” *Journal of affordable housing & community development law* (2011): 169-192.

¹¹⁸ Puget Sound Regional Council, “Alternative Homeownership Models,” June 2023, <https://www.psrc.org/media/2021>

¹¹⁹ Ibid.

¹²⁰ “Newark 360 Shaping Our Future Together”, City of Newark, September 2022. 212 <https://www.newark360.org/newark360-final-plan>

who develop properties with a minimum of 30% of units with 2+ bedrooms to accommodate for their multicultural residents.

Orientation: Action-Oriented or Outcome-Oriented Language

Of the nine policies analyzed from the six municipalities, four were action-oriented, meaning they specified the intended outcome of the policy to “encourage” alternative housing models, such as “co-housing”, and included specific strategies, such as using “site design incentives”. The remaining five policies were outcome-oriented, meaning they included the intended outcome of exploring alternative housing models without any concrete actions for reaching that outcome.

Detail: Detailed or General Language

Eight out of the nine policies analyzed included sufficient detail. Of the four policies that lacked sufficient detail, all of them were unable to address *where*, *when*, or *how* the policy would be implemented. For example, some policies stated, “encourage a range of housing types” without explaining *where*, *when*, or *how* they would encourage a range of housing.

Alignment with HB 1220

As mentioned earlier, promoting the development of alternative housing models is a way for municipalities to increase homeownership for low and moderate-income families by using higher density smaller homes and offsetting market prices. Further, policies that promote the creation of alternative housing models address exclusion and racially disparate impacts in housing as mandated by HB 1220. Because alternative housing models require more inclusionary zoning practices, increase neighborhood density, and are more affordable, they allow for more income and racial diversity within neighborhoods that may have previously been exclusionary and too costly for lower-income families.

Since all the policies related to the creation of alternative housing models use suggestive language, there is no clear indication that any of these municipalities will actually implement alternative housing models in their respective cities. At the same time, co-housing and housing co-operatives are typically funded by the members themselves, so a city’s support of their development may be enough for more to be built.¹²¹

Therefore, the authors highlight the most common framing of alternative housing models among the policies analyzed.

Tukwila
Policy H5.7

*Support the creation of co-housing, housing cooperatives, co-living buildings, and other types of housing that provide community-oriented housing alternatives for families, seniors, young singles, religious communities, or other groups with specific needs.*¹²²

Similar to other cities, Tukwila supports the creation of alternative housing models and even lists four different models as well as the potential target groups that would benefit from alternative housing models.

Comparative Analysis

Comparing municipalities by their population size, displacement risk, and level of diversity, no significant differences existed in alternative housing model policies written. Of the six municipalities that included

¹²¹ Cohousing Association of the United States. *Gathering Resources*. 2025. <https://www.cohousing.org/resources>
¹²² “Tukwila Comprehensive Plan 2024-2044,” City of Tukwila, December 2024.8
<https://www.tukwilawa.gov/wp-content/uploads/DCD-4-HOUSING-12-24.pdf>

alternative housing model policies, they all used suggestive, outcome-oriented language, suggesting they are all considering developing models but are not currently mandating it. However, of the cities who did not include alternative housing model policies, two of the three have low displacement risk. This could indicate that cities with higher risks for displacement are more focused on developing as many different types of affordable housing as possible, since their needs are more immediate than the municipalities with lower levels of displacement risk.

5.2.2 Promote Alternative Housing Models Summary

- **Alternative Housing Models** provide affordable homeownership opportunities to lower and middle-income families, who otherwise would not be able to own a home
- **Six out of nine municipalities evaluated have policies to create alternative housing models**, based on:
 - **Accountability:** Seven out of nine policies use considerate language to set goals and aspirations toward exploring alternative housing models.
 - **Orientation:** About half of municipalities use outcome-oriented language; four use action-oriented language providing a specific strategy for encouraging development of alternative housing models.
 - **Detail:** Most policies have sufficient detail, but many do not specify *how* or *when* alternative housing will be implemented.
- **Key takeaway:** Most municipalities would like to explore creating alternative housing models in their respective cities, to address exclusion and racially disparate impacts. However, no policies explicitly direct municipalities to implement alternative housing models. Unlike other housing models, co-housing and co-operatives are traditionally funded by the members themselves with some private investment, so municipal support may be enough to usher in new development.

5.2.3 Affordable Housing Requirements for New Housing Developments

Ensuring housing abundance prevents exclusion and its main driver is housing production, but if not complemented by intentional policies requiring affordable units within the new housing developments, it may not address the needs of low income families and individuals. In addition, these types of requirements help create diverse cities and avoid the concentration of affordable housing developments in some areas, while leaving other parts of cities with no affordable housing supply.

Accountability: Directive or Suggestive Language

A total of nineteen policies referring to affordable housing in terms of housing production were identified with seven out of the nine municipalities under study having at least one policy referring to this topic. Fourteen policies use directive language including verbs such as "implement", "provide", "review", "update", and "increase".

Orientation: Action-Oriented or Outcome-Oriented Language

Out of the nineteen policies evaluated, thirteen used action-oriented language. Outcomes such as guide sustainable and equitable development patterns that incorporate affordable housing, develop and preserve long- term affordable housing options, or increase housing capacity and affordable housing, were linked to a variety of actions, including implement zoning, regulation, and incentive changes; provide

incentives and work in partnership with not-for-profit and for-profit developers land trusts; or promote and recalibrate existing housing incentives and pursue new ones.

Detail: Detailed or General Language

Of the nineteen policies evaluated, nine can be categorized as using detailed language while ten are categorized as using general language. Only four of the seven municipalities including policies related to affordable housing had at least one policy with a sufficient level of detail.

Alignment with HB 1220

As described above, the intentionality in policies requiring affordable units within the new housing developments is key to address the needs of low income families and individuals. Kirkland's policy H-1.6 stand out as a best practice in this matter due to its use of directive language, specifically through the use of the verb "create, which is used to mandate action towards the creation of a program to provide benefits for development in sites owned by certain type of organisations in exchange of including affordable housing. This policy is also action-oriented, because it links an outcome such as producing affordable housing, to specific actions like creating a program, approving regulations, providing notice, and prefer certain projects.

Lastly, this policy is also detailed as it specifies *who* (the city) will do *what* (create a program allowing community-based organizations to propose customized development regulations for their properties in exchange for providing affordable housing), *why* (to incentivize the creation of affordable housing and maintain space for the ongoing operation of community-serving organizations), *where* (in faith-based or other non-profit and community-based organizations' land), and *how* (the customized regulations and associated public benefits must be considered by the Planning Commission and ultimately approved by City Council on a property-specific basis).

Kirkland Policy H-1.6

*Create a program that allows faith-based, or other non-profit and community-based organizations, to create customized development regulations for their properties in exchange for providing substantial public benefits, including affordable housing. The customized regulations and associated public benefits must be considered by the Planning Commission and ultimately approved by City Council on a property-specific basis. The City must provide comprehensive public notice to surrounding properties of any proposed changes and associated public benefits. Preference should be given to projects with deep levels of housing affordability that provide space for continued operation of the faith-based and other community organizations.*¹²³

Tukwila also had a policy that used directive language, implying accountability, that was action-oriented and detailed. Tukwila 's policy aims to implement zoning, regulation and incentive changes to guide new development including affordable housing, especially in areas near transit.

Comparative Analysis

Tukwila and Kent, the two municipalities with the highest displacement risk, are the only ones that did not include policies on affordable housing requirements for new developments. In contrast, Lynnwood and

¹²³ "Kirkland 2044 Comprehensive Plan Update," City of Kirkland, December 2024. 6
https://www.kirklandwa.gov/files/sharedassets/public/v/1/planning-amp-building/kirkland-2044-comp-plan/k2044-people/housing/pdfs/k2044_final_housing-element.pdf

Kirkland, which rank among the municipalities with lower displacement risk, both included accountable, action-oriented, and detailed policies.

5.2.3 Affordable Housing Requirements for New Housing Developments Summary

- Without intentional policies requiring **affordable units within new developments**, production alone may fail to meet the needs of low-income families and individuals. Affordable housing requirements also contribute to more diverse cities by preventing the concentration of affordable units in only certain neighborhoods.
- **Seven of the nine municipalities evaluated have adopted policies addressing affordable housing requirements within new developments**, based on:
 - **Accountability:** Fourteen of nineteen policies use directive language like "implement," "provide," and "increase," signaling clear action.
 - **Orientation:** Thirteen of the nineteen policies are action-oriented, linking desired outcomes—such as increasing affordable housing options—to specific mechanisms like zoning changes, incentives, and partnerships with nonprofit and for-profit developers.
 - **Detail:** Nine of the nineteen policies are detailed. Most policies remain general, often omitting critical elements such as how implementation will occur. Only four of the seven municipalities have at least one policy with sufficient detail to effectively guide implementation.
- **Kirkland's** Policy H-1.6 stands out for using directive, action-oriented, and detailed language to create a program incentivizing affordable housing on properties owned by faith-based and community-based organizations.
- **Tukwila** also offers a strong example, with a policy that mandates zoning, regulation, and incentive changes to guide new development, particularly near transit, in ways that include affordable housing.

5.2.4 Incentives for Developing Affordable Housing

Municipalities engage in a variety of strategies to incentivize the development of affordable housing units. Most developers will not choose to build affordable housing units, because they would lose money selling a housing unit below market price. Therefore, municipalities use multiple incentive programs to incentivize developers to create affordable housing units to reach their respective affordable housing stock goals. The following incentive programs were mentioned within at least one of the selected cities' comprehensive plans:

- **Multi-Family Property Tax Exemption (MFTE):** municipalities can offer property tax exemptions for projects that include a minimum percentage of affordable housing units. In Washington State, municipalities can offer a 12-year exemption that requires 20 percent of units be sold or rented as affordable to households with low- and moderate incomes, and an eight-year exemption for which affordable housing is not mandatory.¹²⁴ Further, under Washington's SB 5287 (2021),

¹²⁴ Shazia Manji et al. "Incentivizing Housing Production," *Turner Center for Housing Innovation*. 2023. <https://turnercenter.berkeley.edu/wp-content/uploads/2023/02/State-Land-Use-Report-Final-1.pdf>

municipalities can offer a 20-year property tax exemption to qualifying projects, provided that at least 25 percent of units are sold to a qualified nonprofit or local government partner that will guarantee permanent affordable homeownership for households earning 80 percent of the area median income (AMI) or less.¹²⁵

- Regional Housing Trust Funds: Municipalities can work together on housing initiatives by pooling funds and resources for affordable housing development, and distributing them on a regional basis by establishing an interlocal agreement.¹²⁶ Typically, these regional housing trust funds are funded through member cities' collection of sales and use taxes, document recording fees, restate transfer and excise taxes, sales tax, and developer fees. All nine of the municipalities analyzed, participate in some form of a regional housing trust fund to share funding resources to meet their collective affordable housing goals.
 - South King Housing and Homelessness Partners (SKHHP), includes Tukwila and Kent.¹²⁷
 - South Sound Housing Affordability Partners (SSHAP) includes Lakewood, Tacoma, and University Place.¹²⁸
 - Alliance for Housing Affordability (AHA) includes Lynnwood and Marysville.¹²⁹
 - A Regional Coalition for Housing (ARCH) includes Kirkland.¹³⁰
 - Kitsap County's Community Investments in Affordable Housing (CIAH), includes Port Orchard.¹³¹
- Density Bonuses: Municipalities can permit developers to build more housing units, taller buildings, or more floor space than normally allowed in exchange for providing a defined public benefit, such as including affordable units in the development. Alternatively, developers could contribute to a housing fund instead of building the affordable units on site.¹³²
- Fee Waiver Reduction: Municipalities could decide to waive the fees associated with the development process, such as impact fees and building permit fees, in exchange for a percentage of affordable housing units within the described project.¹³³
- Parking Reductions: Municipalities can reduce the minimum parking standards to help reduce the cost of development, determining adequate parking needs for a respective neighborhood.¹³⁴

Eight out of nine municipalities include specific policies to encourage the development of affordable housing units. Affordable housing incentive programs help cities to entice developers into creating partial or full housing that is priced below market rate as a way to mitigate displacement and exclusion.

¹²⁵ Ibid.

¹²⁶ "Addressing housing challenges on a regional basis," *Local Housing Solutions*, March 17, 2025, <https://localhousingolutions.org/plan/addressing-housing-challenges-on-a-regional-basis/>

¹²⁷ "About SKHHP," *SKHHP*, 2025, <https://skhhp.org/about-skhhp/>

¹²⁸ "Capital Fund," *South Sound Affordable Housing*, 2025, <https://southsoundaffordablehousing.org/ssha3p-housing-capital-fund/>

¹²⁹ "About AHA," *Housing Allies*, 2025, <https://housingallies.org/about-aha/>

¹³⁰ "Housing Trust Fund," *ARCH*, 2025, <https://www.archhousing.org/housing-trust-fund>

¹³¹ "Community Investments in Affordable Housing (CIAH)," *Kitsap County*, 2025, <https://www.kitsap.gov/hs/Pages/Affordable-Housing.aspx>

¹³² "Density Bonuses," *Puget Sound Regional Council*, 2020, <https://www.psrc.org/media/2027>

¹³³ "Fee Waivers or Reductions," *Puget Sound Regional Council*, 2024, <https://www.psrc.org/media/2030>

¹³⁴ "Parking Reductions," *Puget Sound Regional Council*, 2023, <https://www.psrc.org/media/2053>

Accountability: Directive or Suggestive Language

Eight out of the nine policies analysed used directive, accountable language, implying the city will take action. Two policies used suggestive language, such as “encourage”, implying aspiration toward the policy goal but not actionable steps.

Orientation: Action-Oriented or Outcome-Oriented Language

Of the 11 policies analyzed from the eight municipalities, the majority of policies were action-oriented, meaning they specified the intended outcome of the policy to “incentive” development of affordable housing with specific strategies, such as “tax incentives” or “equitable land use incentives”. Two policies used outcome-oriented language whereby they included the intended outcome of the policy and no strategy to meet the outcome, such as “explore establishing”, but not explaining how they will explore or decide whether or not to implement the incentive program.

Detail: Detailed or General Language

Ten out of the 11 policies analyzed included sufficient detail of their policies. Of the two policies that lacked sufficient detail, all of them were unable to address *how or when* the policy would be implemented.

Alignment with HB 1220

As mentioned earlier, incentive programs are essential to promoting the development of affordable housing units. Further, policies that explicitly incentivize the development of affordable units addresses displacement and exclusion as mandated by HB 1220. While all the policies mention some incentive program to promote affordable housing development, the authors want to highlight Tacoma's two policies, together.

Tacoma Policy H-1.6	<i>Implement equitable land use incentives such as density or development bonuses, lot size reductions, transfer of development rights, height or bulk bonuses, fee waivers, accelerated permitting, parking requirement reductions, tax incentives, and “surplus land sales” to remove housing development barriers for income-restricted affordable housing and other housing types serving cost burdened communities.¹³⁵</i>
Policy H-1.7	<i>Review and update affordable housing incentives and requirements, such as those listed in H-1.6, to improve their efficacy and impact.¹³⁶</i>

Combined, they are action-oriented, detailed, and use directive language, clearly articulating the city's commitment to implementing incentive programs as well as review and update the requirements to ensure they are implemented effectively. Also, Tacoma is the only city to list out multiple incentive programs and commit themselves to implementing these incentives. Tacoma's Policy H-1.6 is made stronger by its pairing with Policy H-1.7, because it commits the city to updating and reviewing the incentive programs, ensuring reach their goal of “removing housing development barriers for income-restricted affordable housing,” aligning itself with HB 1220's mandate.

Comparative Analysis

In comparing cities by population size, the only cities that used suggestive language were municipalities with smaller populations: Port Orchard and Tukwila. Both have different housing production needs. Port

¹³⁵ “One Tacoma: Comprehensive Plan,” City of Tacoma, 2025. 66
<https://cms.tacoma.gov/Planning/Comprehensive%20Plan/2024%20Update/05-%20Housing%20DRAFT.pdf>

¹³⁶ IBID

Orchard, having a moderate risk of displacement and new greenfield development, is not as worried about housing production. Alternatively, Tukwila's community members are at high risk for displacement, and the city does not have areas for new development, so they are much more concerned with implementing anti-displacement strategies. At the same time, both cities mentioned funding concerns related to building the housing units needed at the various income levels, with Port Orchard concerned about the city's ability to reach housing targets for <50% AMI, given their current funding for these types of housing through the MFTE program and Habitat for Humanity are limited, so they mentioned the need for federal funding for this type of housing.¹³⁷ Tukwila, on the other hand, like much of South King County, has a surplus of 30-80% AMI housing, but is concerned about addressing housing needs for 0-30% AMI and 100-120% AMI. Both cities are considering programs to provide tax incentives to increase housing production, but neither are currently implementing one. Whereas the six larger cities with housing production incentive programs use directive action-oriented language, suggesting they are already utilizing some strategy to incentive more housing development.

5.2.4 Incentives for Developing Affordable Housing Summary

- **Incentivizing the development of affordable housing** is essential to ensuring that new housing units, below market price, are actually built.
- **Eight out of nine municipalities evaluated have specific policies to incentivize affordable housing development**, based on:
 - **Accountability:** Most policies use directive language to direct action towards implementing incentive programs.
 - **Orientation:** Most municipalities use action-oriented language; two only included their intended outcomes of the policy.
 - **Detail:** Most policies have sufficient detail, but two do not specify *how* or *when* they will be implemented.
- **Tacoma's** paired policies are a good example of how policies can build on one another to increase accountability and ensure policies are implemented with the desired outcomes of increasing the supply of affordable housing units through incentive programs.
- **Key takeaway:** All municipalities participate in at least one incentive program to promote the development of affordable housing. While all cities participate in a regional housing capital fund and most use a MFTE, only a couple are explicitly implementing or exploring zoning incentive programs, such as lowering parking requirements or density bonuses.

5.2.5 Mixed-Income Housing

Mixed-income housing refers to neighborhoods or developments that include residents from a range of income levels, creating economically diverse communities. Concentrating affordable housing in isolated areas has been linked to negative socioeconomic and health outcomes for residents. In contrast, mixed-income housing helps counteract exclusion by offering opportunities for older adults who want to age in place, young adults entering the housing market, and families seeking affordable options—without the risk of being displaced from their communities.

¹³⁷ Data from interviews

In addition to addressing economic inequality, mixed-income housing also intersects with race. It has increasingly been used as a strategy to tackle both economic and racial segregation in urban areas. Because income and race are often closely connected due to historical and systemic inequities, efforts to create mixed-income communities inevitably carry racial implications, even if race is not an explicit focus. These developments aim to correct longstanding disparities by creating access for historically marginalized groups to live in neighborhoods with better schools, safer environments, and more diverse job opportunities, which can lead to improved economic outcomes. Furthermore, by fostering everyday interactions across racial and economic lines, mixed-income housing can also promote greater racial understanding and help reduce both conscious and unconscious bias.

As such, mixed-income housing serves not only as a housing strategy but also as a broader social policy tool. It can play a crucial role in addressing racially disparate impacts, exclusion, and displacement. Notably, one of the stated goals of the Growth Management Act is to “plan for and accommodate housing affordable to all economic segments of the population.” While other policies examined in this analysis may support mixed-income housing indirectly or aim to promote economic diversity through different means, this section will focus specifically on the six municipalities that have adopted policies aimed at increasing the availability of mixed-income housing.

Accountability: Directive or Suggestive Language

Three policies used directive language, while the other policies used suggestive language. There were ten individual policies across the six municipalities. Frequently, municipalities used the suggestive word “encourage” in their mixed-income housing policies, but did not specify how they would encourage mixed-income housing.¹³⁸ Tukwila used directive language in their policy to “review and update” code to “support” middle-density housing, which can be a tool used to achieve mixed-income neighborhoods. However, they did not specifically address mixed-income housing in that policy.

Did You Know?

Minneapolis published multiple mixed-income housing policies due to a high concentration of development of new housing in amenity-rich areas. Below is a policy which uses directive, action-oriented, and detailed language.¹³⁹

Minneapolis
Policy 37.a *Create and refine policies, programs, regulations, and other tools to develop mixed-income housing throughout the city for ownership and rental housing.*¹⁴⁰

Orientation: Action-Oriented or Outcome-Oriented Language

Six out of then policies were action-oriented. When municipalities included directive actions, they referenced updating development regulations, zoning allowances, or other municipal codes in order to achieve mixed-income housing.

¹³⁸ Kontokosta, C. E. (2014). Mixed-Income Housing and Neighborhood Integration: Evidence from Inclusionary Zoning Programs. *Journal of Urban Affairs*, 36(4), 716–741. <https://doi.org/10.1111/juaf.12068>

¹³⁹ City of Minneapolis (2020). Minneapolis 2040 - The City's Comprehensive Plan. <https://minneapolis2040.com/pdf/>

¹⁴⁰ Ibid, 168

Detail: Detailed or General Language

Eight out of the ten policies were detailed, rather than general, policies. However, only two policies included all detail aspects. Policies often did not specify *how* or *why* they would be implemented. For this particular policy, it is important that *where* is city-wide to prevent perpetuating exclusion, but this was not explicit in most policies.

Alignment with HB 1220

Mixed-income housing aligns with HB 1220's goal of addressing racially disparate impacts, exclusion, and displacement. It is an essential part of ensuring that municipal housing policy is inclusive, stabilizing, and racially conscious. While most municipalities did address mixed-income housing, few tied mixed-income housing to the equity outcomes in HB 1220, and the majority of municipalities did not include implementation guidance.

Kent | *Encourage dispersion of affordable homeownership projects, such as Habitat for Humanity or similar models, in all residential zones in order to avoid concentrations and equitably serve communities.*¹⁴¹

Policy SPO2-12

Above is a section of Kent's policy which highlights the importance of dispersing affordable housing through all of a city's residential zones. While this policy does not include a mechanism by which to encourage dispersion, it does highlight a potential model for developing affordable housing, and it highlights that concentrations of affordable housing present equity risks for communities.

Comparative Analysis

There was no concrete evidence to support the analysis of cities' policies based upon their demographic groupings.

5.2.5 Mixed-Income Housing Summary

- **Mixed-income housing means economically diverse neighborhoods**, and concentrations of affordable housing are a symptom of exclusion.
- **Six out of nine comprehensive plans evaluated included policies to increase homeownership**, based on:
 - **Accountability:** Three of the ten policies identified use directive language, while others use suggestive language such as "encourage."
 - **Orientation:** Eight out of ten municipalities used action-oriented language, with actions focused on updating regulations and zoning.
 - **Detail:** Eight out of ten policies were identified as detailed, but many do not specify *how* or *why* they will be implemented.
- **Kent** highlighted the importance of dispersing affordable housing to create mixed-income neighborhoods and avoid concentrations of poverty.
- **Key takeaway:** Municipalities appear hesitant to commit to mixed-income neighborhoods as a tool for addressing displacement, exclusion, and racially disparate impacts.

¹⁴¹ "Kent Housing Options Plans," City of Kent, June 2021. 88.
<https://www.kentwa.gov/departments/econ-community-dev/kent-housing-options-plan>

5.2.6 Accessory Dwelling Units (ADUs)

Accessory Dwelling Units, commonly known as ADUs, are a flexible and increasingly popular housing option that offers communities a way to increase housing supply without drastically altering neighborhood character. ADUs are small, independent residential units located on the same lot as a primary home. They may take the form of detached backyard cottages, converted garages, basement apartments, or additions to an existing home. Designed to be fully self-contained, ADUs typically include a kitchen, bathroom, living space, and a separate entrance.

The importance of ADUs lies in their ability to add diverse, lower-cost housing options within existing neighborhoods. As cities across the Puget Sound region grapple with rising housing costs and population growth, ADUs present a practical tool for addressing housing shortages—particularly in single-family zones. By offering homeowners the opportunity to build or convert space into livable units, ADUs support gentle density increases and expand the availability of rental housing without requiring large-scale development.

ADUs also promote housing stability and intergenerational living. They can provide homeowners with supplemental income, create flexible living arrangements for extended family members, or offer downsizing opportunities for seniors wishing to remain in their communities. In some cities, ADUs are also being explored as part of affordable housing strategies, with incentives for homeowners to rent them at below-market rates or make them available to individuals exiting homelessness.

Within the Puget Sound region, municipalities have taken varied approaches to ADU regulation and promotion. Some cities have streamlined permitting processes, reduced minimum lot size requirements, or waived fees to encourage ADU development. Others are working to balance community concerns with the need for more diverse housing options. While policies differ, the regional trend is clear: ADUs are being recognized as an important, adaptable housing solution that can play a meaningful role in addressing the housing crisis while preserving neighborhood character.

Accountability: Directive or Suggestive Language

Eight of the nine cities analyzed incorporate directive language in their discussions of policies related to Accessory Dwelling Units (ADUs), signaling a proactive approach to addressing housing flexibility and supply. The presence of assertive, action-driven terms such as create, implement, monitor, promote, and provide demonstrates a clear intent to move beyond conceptual support and toward tangible policy execution. This kind of language not only outlines the cities' commitments but also offers greater clarity on the steps they plan to take to facilitate the development and integration of ADUs within their communities.

Orientation: Action-Oriented or Outcome-Oriented Language

Of the nine cities analyzed, only three used specific, action-oriented language to clearly outline how their policies will be implemented, providing detailed steps and mechanisms for translating goals into practice. In contrast, the remaining six cities relied primarily on outcome-oriented language, focusing on the desired end results without specifying the means by which those outcomes would be achieved. While outcome-oriented language can express strong intentions, its lack of procedural detail may hinder effective implementation, making it more difficult to assess progress, allocate resources, or hold stakeholders accountable.

Detail: Detailed or General Language

In analyzing the comprehensive plans of nine cities, a clear distinction emerged between those that used detailed, action-oriented language and those that relied on general, outcome-oriented statements. Only

three of the nine cities provided specific language that outlined how their emergency housing policies would be implemented, including concrete steps, responsible entities, and mechanisms for follow-through. These cities translated their goals into detailed plans—offering clarity not only about what they intend to achieve but also about how they plan to get there.

Alignment with HB 1220

Among the nine cities analyzed, seven incorporated directive language into their ADU-related policies, using clear terms like create, implement, promote, and monitor. This indicates a commitment not just to allowing ADUs, but to actively facilitating their development. Some cities have introduced incentives such as streamlined permitting, reduced fees, or relaxed zoning standards to encourage more widespread adoption. These efforts directly support HB 1220's goals by removing regulatory barriers and enabling more inclusive, adaptable housing solutions.

However, only three cities provided detailed, action-oriented policies that outline specific steps for ADU implementation. These cities offer clear guidance on how their goals will be operationalized, which is essential to fulfilling HB 1220's requirements around planning accountability and housing equity. In contrast, cities that rely solely on outcome-oriented language—without specifying the “*how*”—risk falling short in meeting the law's expectations for measurable, enforceable progress. By prioritizing ADUs through concrete, incentivized policies and clearly defined implementation steps, cities are not only complying with HB 1220—they are advancing its broader vision of a diverse, affordable, and equitable housing landscape across Washington State.

Tacoma Policy H-3.7

Provide incentives (e.g. density or development bonuses, lot size reductions, transfer of development rights, height or bulk bonuses, fee waivers, accelerated permitting, parking requirement reductions, and tax incentives, and surplus land sales) to promote the development of affordable, mixed-income housing citywide. Discourage the concentration of facilities for “high risk” populations in any one geographic area.¹⁴²

Comparative Analysis

The analysis of the nine cities did reveal a notable division among types of language used: action-oriented or outcome-oriented, with three using action-oriented and six using outcome-oriented. However, no clear shared characteristics or patterns emerged among the nine cities analyzed. The type of language used did not appear to align with any specific factors such as population, racial demographics, or socio-economic status of the city.

5.2.6 Accessory Dwelling Units (ADUs) Summary

- **Accessory Dwelling Units (ADUs)** are small, self-contained residential units located on the same lot as a primary home—such as backyard cottages, basement apartments, or converted garages—that offer a flexible way to increase housing supply without significantly altering neighborhood character.
- **Seven of nine cities** used directive language in ADU policies, showing active support for

¹⁴² “One Tacoma: Comprehensive Plan,” City of Tacoma, 2025. 70
<https://cms.tacoma.gov/Planning/Comprehensive%20Plan/2024%20Update/05-%20Housing%20DRAFT.pdf>

development.

- **Tacoma's Policy H–3.7** supports ADU development by proposing the creation of affordable design options and financing packages—developed in collaboration with local architects and lenders—to help moderate- and low-income households build or convert ADUs.

5.3 Preservation Policies

As mentioned in Chapter 4, preservation-focused policies aim to prevent displacement by maintaining and protecting the existing affordable housing stock that serves low-income populations. These policies prioritize the preservation of mobile home parks, manufactured homes, and naturally occurring affordable housing (Table 4).

Classification	Policy Category	Objective	Criteria
Preservation	Naturally Occurring Affordable Housing (NOAH)	Displacement/RDI	Does the plan include policies for protecting and preserving Naturally Occurring Affordable Housing?
	Manufactured Homes	RDI/ Exclusion	Does the plan include policies ensuring the preservation of mobile home parks and manufactured homes?

Table 4. Classification of preservation policy categories under study within the Comprehensive Plans.

5.3.1 Naturally Occurring Affordable Housing (NOAH)

Naturally occurring affordable housing (NOAH) refers to privately owned residential properties that, without subsidies from federal or state programs, have relatively low rents or purchase prices compared to the regional market. Preserving NOAH and its affordability can potentially prevent displacement of BIPOC and socioeconomically disadvantaged communities¹⁴³ by providing affordable housing options. NOAH properties are at risk both from redevelopment pressures and because they are often older structures in need of repairs and ongoing maintenance to remain habitable and affordable. However, focusing on preservation of NOAH does not prevent economic displacement, since homeowners can be pressured into selling their property to a developer, displacing current residents. Additionally, NOAH can suffer from disinvestment by the property owners who neglect the maintenance of the property, which in turn perpetuates racially disparate impacts since BIPOC disproportionately live in NOAH. Policies preserving NOAH can mitigate displacement and RDI when they are coupled with protection policies, such as tenant protections.

Accountability: Directive or Suggestive Language

A total of 21 policies referring directly or indirectly to naturally occurring affordable housing were identified. Only nine of those policies use directive language and only four of the nine municipalities under analysis used directive language in at least one of their policies. In those cases policies include verbs such as "protect", "establish", and "maintain."

A majority of policies in the Puget Sound Region use Suggestive language, indicating support for the preservation of naturally occurring affordable housing but without a supporting mechanism of action. In those cases Suggestive language was used, including verbs such as "support" and "encourage", which imply aspiration toward the policy goal but not actionable steps.

¹⁴³ Chapple, K., Loukaitou-Sideris, A., Miller, A., & Zeger, C. (2023). The Role of Local Housing Policies in Preventing Displacement: A Literature Review. *Journal of Planning Literature*, 38(2), 200–214. <https://doi.org/10.1177/08854122221137859>

Did You Know?

Portland, Oregon, created a specific policy to preserve NOAH using directive, actionable, and detailed language.

Portland Policy 3.3.e

When private property value is increased by public plans and investments, require development to address or mitigate displacement impacts and impacts on housing affordability, in ways that are related and roughly proportional to these impacts.¹⁴⁴

Orientation: Action-Oriented or Outcome-Oriented Language

Of the 21 policies evaluated, 13 used action-oriented language, while 8 used outcome-oriented language. Eight of the nine municipalities under analysis used action-oriented language in at least one of their policies related to naturally occurring affordable housing. Outcomes often focused on protecting the stock of naturally occurring affordable housing, both in terms of preservation and maintenance. Municipalities reinforce these outcomes with a variety of actions, including encouraging the preservation of the existing stock of mobile home parks, encouraging repair and maintenance of the existing housing stock working with volunteer programs that offer home repair and maintenance assistance, maintaining need-based housing rehabilitation and repair programs, or integrating regulatory tools to incentivize adaptive reuse and conversion.

Only one city did not have any policies with a mechanism of action; that municipality indicated support for the preservation of naturally occurring affordable housing, among other sources of affordable housing to ensure housing stability for all community members, but did not specify a mechanism of action for how they would support them.

Detail: Detailed or General Language

Of the 21 policies evaluated, 15 can be categorized as using detailed language while 6 are categorized as using general language. Eight of the nine municipalities had at least one policy with a sufficient level of detail. Policies often lacked the *when* conditional marker.

Alignment with HB 1220

As described above, preserving naturally occurring affordable housing helps prevent displacement and addresses racially disparate impacts in housing, as required by HB 1220. Lakewood's policies HO-3.6 and HO-3.7 stand out as best practices in this matter due to their use of directive language, specifically through the word *maintain*, which is used to mandate the continuation of a housing rehabilitation and repair program. These policies are also action-oriented, directly linking the rehabilitation of lower-income housing to the maintenance of a need-based grant program. Lastly, they are also detailed as they specify *who* (the city) will do *what* (maintain an existing housing rehabilitation grant program), *when* (on an ongoing basis), and for whom (households with incomes at or below 80% of AMI).

¹⁴⁴ "Anti-Displacement Action Plan Foundation Report - Appendices," City of Portland, April 2021. 5
<https://www.portland.gov/bps/planning/adap/documents/anti-displacement-action-plan-foundation-report-appendices/download>

Lakewood
Policy HO-3.6

Maintain a need-based program for housing rehabilitation grants to lower-income homeowners at 80% of AMI or below.¹⁴⁵

Policy HO-3.7

Maintain need-based housing rehabilitation and repair programs for rental housing meeting the needs of lower-income households at 80% of AMI or below.¹⁴⁶

Tacoma and Tukwila also adopted policies that used directive language, implying accountability, that were action-oriented and detailed. Tacoma's policy focuses on promoting the maintenance and repair of the city's existing housing stock, including efforts to secure financial incentives and funding to sustain housing improvement programs for low-income households. Tukwila's policy, meanwhile, seeks to evaluate the City's actions based on their potential to increase the displacement risk for naturally occurring affordable housing.

Comparative Analysis

Cities with higher levels of displacement risk appear more likely to adopt accountable, action-oriented, and detailed policies to protect naturally occurring affordable housing. This is evident in Tukwila and Lakewood, both ranked among the three municipalities with the highest displacement risk. In contrast, the three cities with the lowest displacement risk (Kirkland, Marysville and University Place) included policies that were less detailed and used more aspirational or considerate language.

5.3.1 Naturally Occurring Affordable Housing (NOAH) Summary

- **Preserving naturally occurring affordable housing** is an important tool for preventing displacement and racially disparate impacts, making it an essential component of addressing housing needs at each income level.
- **All the municipalities evaluated have policies addressing the preservation of naturally occurring affordable housing**, based on:
 - **Accountability:** Most policies rely on considerate, aspirational language rather than directive language, signaling intent but lacking the decision required for effective implementation.
 - **Orientation:** While many municipalities use action-oriented language, eight cities employ outcome-oriented language that lacks clarity on specific actions.
 - **Detail:** Only about one-quarter of the policies reviewed didn't include sufficient detail to clearly guide implementation.
- **Lakewood** stands out by the specificity of two policies directly linking the rehabilitation of lower-income housing to the maintenance of a need-based grant program.
- **Tacoma and Tukwila** also have direct, action-oriented policies with specific strategies for preserving naturally occurring affordable housing. Both policies would have been stronger if they were more specific in terms of the target population.

¹⁴⁵ "Lakewood Comprehensive Plan," City of Lakewood, September 2024.

<https://cityoflakewood.us/wp-content/uploads/2024/11/091724-CompPlan-v.5.0-CLEAN-adopted-by-CC.pdf> 6-23

¹⁴⁶ IBID

- **Key takeaway:** Most municipalities recognize the importance of preserving naturally occurring affordable housing as an effective way to address displacement and racially disparate impacts and most of their policies in this area focus on different alternatives to ensure its repair and maintenance. However, policies are limited by the use of suggestive language.

5.3.2 Preserving Manufactured Homes and/or Mobile Park Homes

Manufactured homes (MH) are a central component of affordable housing. A new manufactured home costs less than half per square foot what a new site-built home costs, and throughout the 1990s manufactured homes were responsible for 66% of the new affordable housing produced in the United States.¹⁴⁷ They are an essential housing option to ensure lower-income individuals can access housing. At the same time, “manufactured homes” is an umbrella term that can refer to a range of types of housing from manufactured homes on privately owned property to rental units to owned homes placed on rented lots in mobile home parks (MHP).¹⁴⁸ Given that all mobile park homes are manufactured homes, but not all manufactured homes are located in mobile park homes, this analysis distinguishes between them. However, since the majority of municipalities lumped together policies related to manufactured homes with mobile park home preservation or only included one, this analysis includes policies that mention either manufactured home or mobile park home preservation.

Mobile homes provide the largest source of unsubsidized affordable housing in the United States.¹⁴⁹ At the same time, residents living in mobile park homes are at risk of displacement because they often rent the land on which their homes are located.¹⁵⁰ To ensure mobile home owners can preserve their housing, Washington State passed SB 5198 in 2023 that provides residents of the mobile park homes with the opportunities to purchase the property as part of the entire mobile park community.¹⁵¹ Therefore, in cities’ 2024 comprehensive plans, each includes policies to be in line with or expand upon the SB 5198 legislation to ensure they address housing affordability as outlined in HB 1220. Additionally, preserving mobile park homes is a way for cities to mitigate displacement and racially disparate impacts (RDI) as it prevents residents who may not be able to afford other types of housing to stay in their homes.

Seven out of nine municipalities include specific policies to preserve manufactured homes and/or mobile park homes, seeing them as vital affordable housing options that help to mitigate displacement and RDI.

Accountability: Directive or Suggestive Language

Five out of seven municipalities in this analysis used directive, accountable language in at least one of their policies to preserve MH and/or MHP, implying the city will take action. Another three policies used suggestive language, such as “encourage”, implying aspiration toward the policy goal but not actionable steps.

¹⁴⁷ Noah J. Durst & Esther Sullivan, “The Contribution of Manufactured Housing to Affordable Housing in the United States: Assessing Variation Among Manufactured Housing Tenures and Community Types,” *Housing Policy Debate* 29, no.6 (2019): 880–898, doi:10.1080/10511482.2019.1605534.

¹⁴⁸ Ibid.

¹⁴⁹ Esther, Sullivan, “Moving out: mapping mobile home park closures to analyze spatial patterns of low-income residential displacement,” *City & Community* 16, no. 3 (2017): 304–329.

¹⁵⁰ Ibid.

¹⁵¹ Jill Dvorkin, “2023 planning legislation impacting local governments,” *Municipal Research Services Center*, 2023, <https://mrsc.org/stay-informed/mrsc-insight/september-2023/2023-planning-legislation-6-bills>

Orientation: Action-Oriented or Outcome-Oriented Language

Of the 12 policies analyzed from the seven municipalities, five policies were outcome-oriented, meaning they specified the intended outcome of the policy to “preserve” naturally occurring affordable housing, such as manufactured and/or mobile park homes, but no specific implementation steps. Seven policies used action-oriented language whereby they included the intended outcome of the policy with a strategy to meet the outcome, with two mentioning coordinating outreach to those who rent and/or own mobile park homes.

Detail: Detailed or General Language

Nine of the policies analyzed included sufficient detail of their policies. Of the three policies that lacked sufficient detail, all of them were unable to address how or when the policy would be implemented. For example, some policies stated, “encourage the preservation of mobile home parks” without relating details for how and when they would preserve them.

Alignment with HB 1220

As mentioned earlier, manufactured homes and mobile park homes are essential components of affordable housing, as they provide a key stock of housing for lower-income individuals. Further, policies that explicitly preserve and maintain manufactured homes and mobile home parks address displacement and RDI in housing as mandated by HB 1220. While all the policies mention preserving and/or maintaining MH and MHPs to some extent, Lakewood’s policy, implementation step, and subarea plan policy stood out as they included a clear and specific policy with specific implementation steps including tailored implementation steps within their subarea plan for Tillicum and Woodbrook (T & W) neighborhoods which is disproportionately lower-income and BIPOC.

Lakewood	<i>Preserve and maintain existing manufactured housing parks as a supply of affordable housing, and encourage long-term housing solutions that will maintain affordable options for residents.</i> ¹⁵²
Policy HO-3.9	
Implementation	
Step HO-1	<i>Coordinate outreach to manufactured home park owners and residents to facilitate preservation of affordable housing.</i> ¹⁵³
T&W Policy 3.2	<i>Establish an overlay district to maintain and preserve existing mobile and manufactured homes as affordable housing options, particularly in Woodbrook.</i> ¹⁵⁴

Lakewood is the only municipality that separates its policies from their implementation steps within their comprehensive plan, as well as the only municipality to have its subarea plan for a specific community to address exclusion and RDI. In the city’s policy, they use directive language, “preserve and maintain” MHP, to indicate the city will take action to reach their outcome of maintaining “affordable options for residents.” Their implementation step outlines a specific strategy to preserve MHP by “coordinating outreach” to owners and residents of MHP. Finally, they tailored the strategy for preserving MHP in T&W by “establish an overlay district, recognizing the community’s distinct geographical and demographic in its makeup from the rest of the city.

¹⁵² “Lakewood Comprehensive Plan,” City of Lakewood, September 2024.

<https://cityoflakewood.us/wp-content/uploads/2024/11/091724-CompPlan-v.5.0-CLEAN-adopted-by-CC.pdf>. 6-23

¹⁵³ “Lakewood Comprehensive Plan,” City of Lakewood, September 2024.

<https://cityoflakewood.us/wp-content/uploads/2024/11/091724-CompPlan-v.5.0-CLEAN-adopted-by-CC.pdf>. 15-11

¹⁵⁴ “Tillicum-Woodbrook Subarea Plan (TWSP),” City of Lakewood, September 2024.

<https://cityoflakewood.us/wp-content/uploads/2025/01/091724-TWSP-Plan-as-adopted.pdf>. 12

Kent and Lynnwood also had policies that used direct and action-oriented language. Kent's strategy for preserving MHP focused on "educational materials" to distribute to residents of MHP on improving conditions. Lynnwood's policy, contrarily, used providing "regulations" as a strategy to preserve MHP.

Comparative Analysis

Comparing cities by their population sizes, there is not a noticeable difference, since the two cities that did not include policies to preserve manufactured and mobile park homes were Kirkland, a large city, and Port Orchard, a small city. Additionally, Kirkland has a lower displacement risk while Port Orchard has a moderate displacement risk. At the same time, cities with moderate to higher displacement risk used directive action-oriented policies compared to cities with lower displacement risk who used Suggestive outcome-oriented language. This could suggest that cities at higher risk of displacement focused on addressing and preventing displacement in the immediate future by including specific actions, compared to cities who may consider strategies for preserving mobile park homes and manufactured homes in the future.

5.3.2 Preserving Manufactured Homes and/or Mobile Park Homes Summary

- **Mobile Park Homes are** the largest source of unsubsidized affordable housing in the United States, making them an essential component of addressing housing needs at each income level.
- **Seven out of nine municipalities evaluated have policies to preserve mobile park homes,** based on:
 - **Accountability:** Most policies use directive language to direct action toward preserving mobile park homes.
 - **Orientation:** Most municipalities use action-oriented language whereby they included specific strategies, such as coordinating outreach to mobile park home owners and residents
 - **Detail:** Nine out of 12 policies included sufficient detail, but many do not specify *how*, or *when* they will be implemented.
- **Lakewood** stands out by using three distinct strategies to preserve mobile home parks, being thoughtful to target the implementation strategy to address community needs to mitigate RDI and exclusion.
- **Kent and Lynnwood** also have direct, action-oriented policies with specific strategies for preserving MHP. Both policies would have been stronger if they had specifically called out the disproportionate impacts of MHP preservation on BIPOC and/or low-income households.
- **Key takeaway:** Most municipalities recognize the importance of preserving manufactured homes and/or mobile home parks as an affordable housing option, as well as an effective way to address displacement and racially disparate impacts. However, policies are limited by their accountability language and the level of detail in their action mechanism.

Chapter 6: Conclusions & Recommendations

This chapter provides conclusions from the analysis with specific recommendations for municipalities in the state of Washington to incorporate WA HB 1220 requirements to accommodate for housing affordability at all income levels by addressing and undoing displacement, racially disparate impacts, and exclusion through their comprehensive plans, as well as recommendations for elected officials to support planners in their efforts. The conclusions and recommendations are grounded in the analysis of the process and policies of ten municipalities across the Puget Sound Region presented in the previous chapters.

6.1 Conclusions & Recommendations for City Planners

6.1.1 Write Detailed, Specific, and Actionable Policies

Vague and unactionable policies allow cities to recognize that problems exist without having to do anything about it. Policies can drive what cities do with regulations which will ultimately change the housing demographics of a city in the long term. Therefore, cities need detailed, specific, and actionable policies to find solutions such as intersectional policies that address and undo smaller parts that make up the whole issues of displacement, racially disparate impacts, and exclusion. For example, to combat exclusion, a municipality should not just write a policy that adds inclusionary zoning. Municipalities should target specific priority areas and policies that exacerbate exclusionary housing such as preserving affordable housing for low-income residents in high-opportunity areas through home improvement loans, down payment assistance, and subsidized utility rates.

Furthermore, the authors found that cities underestimate their ability to address displacement, racially disparate impacts, and exclusion and could be even more bold and ambitious with their policies as well. Incremental change can help undo displacement, racially disparate impacts, and exclusion in the long term, but bold and ambitious policies will help eliminate these issues while minimizing the adverse impact on communities of color and vulnerable populations.

6.1.2 Make Comprehensive Plans Accessible to All Community Members (in English and other languages)

To allow all readers to have greater tools to overcome barriers to housing and lower resistance from constituents to allow more equitable housing, the following strategies are recommended to ensure comprehensive plans remain well-organized, engaging, comprehensible, and accessible:

1. **Ensure ease of access and clear navigation to empower citizens to be able to locate all relevant information.** Comprehensive plans are necessarily lengthy documents, however, it is helpful when municipalities provide overviews, guidance documents, and other short and accessible resources to help citizens navigate them. In addition to the other recommendations below, consider web pages that are easy to navigate or clear tables of contents and descriptions of how planning documents relate to each other.
2. **Incorporate visual components.** To increase reader engagement and comprehension, visual components should be included when appropriate. Graphs, maps, charts, diagrams, etc. can provide a visual representation of the information being covered and help break up text.

3. **Use clear and standard language.** Avoid heavily technical terms and use standard language whenever possible to ensure accessibility. This ensures a broad audience can understand the information in the Comprehensive Plan.
4. **Ensure one cohesive plan.** Multiple elements make up comprehensive plans, but these elements need to make up one cohesive plan rather than a document that compiles many different elements from siloed departments. This needs to be a concerted effort that centers on serving people, not checking boxes and fulfilling mandates. The Housing Element and Housing Action Plans are not the only places where policies can be written to address and undo displacement, racially disparate impacts, and exclusion.

6.1.3 Conduct Nontraditional, Targeted Community Engagement

Comprehensive plans must be built for and by the cities' community members. To engage and interact with all members of the community, especially those historically underserved and marginalized, cities must conduct interactive community engagement events targeted at specific communities to incorporate voices in comprehensive plans that were often left at the margin. Without these concerted efforts, the same overrepresented voices will be heard in public comment which will continue to exacerbate existing issues of displacement, racially disparate impacts, and exclusion in the Puget Sound Region. The following strategies are recommended to further and advance current cities' public engagement plans:

1. **Travel to each community.** Due to a variety of factors including the disproportionate amount of time- and resource-starved communities of color, cities need to take intentional steps into communities to equitably engage with citizens. Town halls and listening sessions on weekdays after "office hours" are not enough. City planners and officials must attend cultural events in diverse neighborhoods with culturally-competent interactive programs and education to include diverse voices in comprehensive plans.
2. **Holistic approach.** Addressing housing barriers requires multiple approaches, best practice is to engage specific communities in a variety of different ways such as cultural events, community gatherings, and multicultural, citizen-led working groups.
3. **Equity-affirming approach** that does more than address barriers, equity-affirming approach goes beyond welcoming diversity by embedding economic and racial equity into the process.

Targeted public engagement of vulnerable communities will help define the specific policies and issues that cause residential displacement, racially disparate impacts, and exclusion among municipalities. The research and analysis done by cities and consultants will show the indications of disparate impacts, but relying on this information alone will lead to general and outcome-oriented policies. Municipalities that coupled engagement of communities historically unreachable with in-depth analysis published HB 1220-aligned policies that both addressed and sought to undo displacement, racially disparate impacts, and exclusion.

6.2 Conclusions & Recommendations for Elected Officials and Government Leaders

6.2.1 Support Planners and Other Municipal Employees Through Collaborative Governance

The interviews with city planners informed the authors of the rampant capacity and administrative burden issues caused by the requirement to apply multiple groundbreaking housing policy state mandates, particularly HB 1220, HB 1110, and HB 1337 into one comprehensive plan update. The Washington State Department of Commerce and Puget Sound Regional Council stepped in to help and support municipalities through this groundbreaking push of new housing policy, but it was not enough. Integrated collaboration is recommended, from the state legislature to the city planner, through the following strategies:

1. **Develop opportunities for city planners to engage with policymakers** in the same manner citizens engage with local governments (i.e. committees, working groups, open houses) to help inform future state mandates.
2. **Empower planning departments by developing supportive leadership practices** - for example, Kent's mayor directed all departments to work with planning. In contrast, other cities reported that elected officials or department heads were often opposed to transformative policies, which increased the administrative burden placed on city planners..
3. **Provide timely informational resources** such as Washington State Department of Commerce's *Guidance for Updating your Housing Element*¹⁵⁵ and Puget Sound Regional Council's *Passport to 2044 Workshop Series*¹⁵⁶ early and often to manage the added burden on small city planning departments during widespread policy changes.
4. **Identify as many opportunities for funding as possible** and share that information expeditiously with municipalities to help alleviate the ever growing funding gaps for affordable housing.

6.2.2 Develop a Shared Understanding of RDI, Displacement, and Exclusion

HB 1220 mandates municipalities explicitly address racially disparate impacts, exclusion, and displacement within their comprehensive plans. Even though WA Department of Commerce and PSRC provided explicit definitions and resources for municipalities, interviews and plan reviews revealed very different understandings of what these terms mean and how they apply to their housing policies and how to undo them. The following three strategies are recommended to develop a common understanding of the impacts of RDI, Exclusion, and Displacement:

1. **Provide funded interactive trainings for city planners, such as:**
 - a. Defining Institutional Racism, Structural Racism, Racist Policies, and RDI

¹⁵⁵ Washington Department of Commerce. (2023, August 23). *Guidance for updating your housing element*. <https://deptofcommerce.app.box.com/s/1d9d5l7g509r389f0mjpowh8isjpirh>

¹⁵⁶ Puget Sound Regional Council. (n.d.). *Passport to 2044: Comprehensive Plan Workshop Series*. <https://www.psrc.org/our-work/passport-2044-comprehensive-plan-workshop-series>

- b. Historical Racist Housing and Exclusionary Zoning Policies in Washington State: from Redlining to 1990s Exclusionary Housing Policies
 - c. Current Racist Housing and Exclusionary Zoning Policies in Washington State: Legacy of Redlining to Gentrification
- 2. **Develop opportunities for and encourage planners to create Communities of Practice** around how they are incorporating anti-racism into their planning policies and procedures.
- 3. **Provide funding opportunities for city planners to engage with historically marginalized communities outside of the planning period**, to further develop their knowledge of the communities' experiences and current needs.

6.2.3 Monitor Impact of HB 1220

Even if new policies use directive, action-oriented, and detailed language aligned with state mandates and informed by targeted community engagement, the impact of these policies can miss the mark. Municipality, county, regional, and state leaders must monitor the impact of these new policies and require an assessment of their impact prior to the next long-term update of comprehensive plans. This monitoring program and analysis will be more important than the policy making itself to help ensure the right actions are taken for each municipality to begin to undo displacement, RDI, and exclusion.

- 1. **Monitor the extent to which municipalities implement the policies** written in their comprehensive plans that address HB 1220
- 2. **Conduct an outcome evaluation** to understand whether or not the policies written to address HB 1220 achieve their intended outcome as outlined in the comprehensive plan
- 3. **Evaluate the impact of HB 1220** to determine to what extent Washington State achieved its goal of providing housing affordability at all income levels to meet the housing needs over the next twenty years.

Chapter 6 Summary

- **Conclusions and Recommendations for Planners**
 - **Writing detailed, specific, and actionable policies** implies more accountability whereby the municipality will actually implement said policy to address HB 1220.
 - **Comprehensive plans should be written and designed to be accessed by all community members** to ensure the municipalities adequately address barriers marginalized community members face to engage in the planning processes and implementation.
 - **Nontraditional community engagement strategies** should be implemented by all municipalities because those strategies tended to yield more specific, detailed, and actionable policies to address RDI, displacement, and exclusion.
- **Conclusions and Recommendations for Elected Officials**
 - **Support planners in the comprehensive planning process** by providing direct interface access to policy makers, directing departments to work directly with planners, giving timely informational resources, and identifying funding opportunities.
 - **Develop a shared understanding of RDI, displacement and exclusion** by providing interactive trainings, encouraging the development of communities of practice, and

providing funding opportunities for community engagement outside of the planning period.

- **Monitor the impact of HB 1220** to better understand the effect the comprehensive plan policies have on addressing RDI, displacement, and exclusion throughout the state of WA over the next 20 years to meet housing affordability at all income levels.

Chapter 7: HB 1220 Implementation Limitations & Further Research

As a landmark piece of legislation, HB 1220 implementation is an important area of study for all researchers and policymakers interested in housing equity. Implementation limitations are centered around funding, dispersed governance, local capacity, and the immediacy of impact.

7.1 Implementation Limitations

Limitations of this research are discussed elsewhere in this paper, particularly in Chapter 3.7. The Puget Sound Regional Council asked these authors to include their analysis of the limitations of HB 1120, which is described below.

7.1.1 Funding Limitations

Chapter 4.4.3 details the funding sources that city planners used when drafting comprehensive plans. Of these funding sources, two came from the Washington Department of Commerce and one came from pooled financial resources involving multiple municipalities. Comprehensive planning and community engagement is costly, and all municipalities highlighted the importance of adequate funding for the planning process. It is also important to note that some planning departments have greater access to funding than others, either due to the economic status of the city or due to budget priorities.

The next step towards addressing and undoing displacement, RDI, and exclusion is implementing the policies outlined in the comprehensive plans. This step is far more costly – funding is required for building affordable housing, administering homeownership programs, establishing emergency shelters, providing incentives for builders, and for virtually all other policies. There has been widespread uncertainty in federal, state, and municipal budgets. Many people are concerned about the impact of tariffs on construction costs, and state or federal budget cuts may further impact housing policy implementation.

Identifying and creating innovative funding sources will be an important challenge for municipal governments as they seek to implement their comprehensive plans. Without a concerted effort to increase funding for affordable housing, the housing that will be developed will be at- or above-market level pricing – generating profits for developers, rather than increasing housing equity for all community members. Some cities have used Tax Incremental Funding (TIF) to build affordable housing funded by a .1% increase in property taxes, while other cities create partnerships like Housing Trust Funds to apply for larger grants as part of a housing work group. The key is creating diverse funding strategies that rely on multiple revenue streams to execute policies that address displacement, RDI, and exclusion.

7.1.2 Limitations of Dispersed Governance

Consistency of delivery is a challenge when implementing any policy across multiple municipalities. Governments shape and tailor policies to fit local contexts – this is reflected in the various policies analyzed in Chapter 5. Each municipality chose to frame and word their policies to suit local context, with some municipalities foregoing entire policy categories while others utilized a wide range or focused heavily on certain policy types. What works well in one city might not work well in another, and HB 1220 simply sets the parameters that municipalities work with.

Municipalities have discretionary power, and this means that HB 1220 will not be implemented in the same way for every city. The way that a city interprets displacement, exclusion, and RDI will change the policies that they use to address these issues. This can be a positive, which allows cities to fine-tune housing policy to reflect the local context. However, it does limit the level of consistency that state policy makers should expect. In aggregate, these small changes may result in notable differences as cities begin to implement their comprehensive plans.

7.1.3 Limitations of Local Capacity

Washington is the first state to require cities conduct an RDI analysis to identify and remove policies that perpetuate displacement, RDI, and exclusion. RDI analysis is a skill that is increasingly important for governments, but this does not mean that all cities had staff who possessed the time, expertise, knowledge, and experience to analyze racially disparate impacts. As seen in Chapter 4.2.3, many cities partnered with consultants, who did not have the human capital to complete RDI analyses. However, these consultants may not have had the lived experience and deep knowledge that comes with living in or working for a particular city. This local context is extremely important for RDI analysis, and at least one city missed the opportunity to include an important ethnic group because the analysis did not capture the true linguistic diversity of the city.

Human biases and blindness to experiences outside of one's own can occur with contractors or with government employees. Clear guidance, including explicit and measurable evaluation criteria, can help cities complete a full and accurate RDI analysis. Similarly, interviews with city planners revealed the importance of creating clear expectations and a shared understanding of what it means to address RDI, exclusion, and displacement. Some planners struggled to get elected leaders and community members on board with innovative policies that could address inequities. Some dismissed the need for the mandate because they misunderstood the systemic and interconnected nature of RDI, displacement, and exclusion – they believed that other cities had racist and exclusionary policy, but that it wasn't an issue in their city. If there is not a shared understanding of what RDI, displacement, and exclusion are, cities do not have the capacity to skillfully identify and remove policies that perpetuate these barriers. Understanding what these terms mean and how they can be addressed allows cities to be more accountable and detailed in their policies.

7.1.4 Limitations on Immediate Impact

Chapter 2.3 details the long history of racialized housing policy in the Puget Sound Region. Policymakers have committed to addressing and undoing the consequences of this history through legislation like HB 1220, yet the speed of bureaucracy is infamously slow. Policymakers recognize progress is being made towards a more equitable future, but this progress is often not visible to people outside of the policy space. It will be several years before the full impact of HB 1220 can be studied. At this time, the immediate impact is most apparent when someone notices new development in their neighborhood or is targeted for a community engagement opportunity. At the individual level, these things may not seem like the result of landmark legislation to address and undo exclusion, displacement, and racially disparate impacts. At the macro level, it may be several years before the full impact of HB 1220 can be studied.

7.2 Further Research

7.2.1 Analyze the Impact on RDI, Exclusion, and Displacement

As mentioned throughout this paper, HB 1220 is still recent legislation. Now that 2044 comprehensive plans have been written and largely passed, further research is needed to analyze the impact of these policies on racially disparate impacts, exclusion, and displacement. While it may be several years before the full impact is understood, researchers can begin collecting data to understand the current landscape and identify evaluation criteria for future studies. For example, in five years, it will be much more possible to determine how HB 1220 impacted RDI, exclusion, and displacement, and the present moment is an important opportunity for researchers to begin gathering data. It could be very valuable to evaluate RDI, exclusion, and displacement every five to ten years in alignment with the comprehensive planning cycle. The authors hope that the findings presented in this document are helpful for this task, although most of these policies have only been implemented in the last few months.

7.2.2 Conduct a Wealth Inequality Analysis

HB 1220 requires cities to do a housing inventory analysis of current and future housing needs by household income level, but wealth is potentially a better measure of intersecting socioeconomic and racial inequality. Income inequality does not capture overall assets, which are particularly important when considering displacement, exclusion, and racially disparate impacts. Debt impacts a person's ability to buy and rent, and appreciating home values may contribute to a significant wealth gap between owners and renters in the Puget Sound Region. Similarly, many older Washingtonians rely on their home equity – that is, the market value of their home compared to the balance of their mortgage – as an important asset for retirement. Other Washingtonians have access to generational wealth that supplements their household income, such as family wealth that assists with housing costs. Conducting a housing inventory analysis by level of wealth could provide more accurate estimates of the true cost burden, particularly for racial and ethnic minorities.

7.2.3 Identify Local Funding Gaps

As discussed in 7.1.1, funding is a common limitation for municipalities as they begin to implement HB 1220. Further research could assist municipalities by further identifying funding gaps and recommending new funding strategies at both the state and local level. Innovative local funding is particularly important at this time, as economic uncertainty highlights the importance of secure, dedicated funding for housing. However, there may be additional existing funding sources that future researchers could identify. A funding gap analysis would be an excellent opportunity to dig deeper into the costs associated with HB 1220. It would be an important step towards ensuring that municipalities have the resources they need to address and undo racially disparate impacts, displacement, and exclusion.

Chapter 7 Summary

- **HB 1220 Implementation Limitations**
 - **Funding** for affordability at all income levels to meet current and future housing needs is constrained by the availability of diverse funding options and uncertainty of funding options to produce housing below market rate

- **Dispersed Government** creates inconsistency in the implementation of any policy across multiple municipalities, especially when one municipality's policies effects neighboring one.
- **Local Capacity** constraints as some municipalities have more knowledge and expertise to fully address RDI, exclusion, and displacement while other municipalities require additional support.
- **Immediate Impacts** of policies written in response to HB 1220 will be limited due to the time it takes to execute housing policies fully.
- **Further Research**
 - **Analyze the Impact on RDI, Exclusion, and Displacement** and to what extent policies written in response to HB 1220 actually address these issues once they are fully implemented.
 - **Conduct a Wealth Inequality Analysis** to get a more holistic view of what actual current and future housing needs are based on residents' overall wealth, not just income.
 - **Identify Local Funding Gaps** to better understand the funding landscape and recommend new funding strategies to help municipalities reach their housing stock goals.

Appendix A: Interview Protocol

1. Tell me a little about your role in/process for drafting the elements related to HB 1220 in combating displacement, racially disparate impacts, or exclusion.
 - a. What information did you review? PSRC or Commerce Checklists?
 - b. How did you act upon/ incorporate the information you reviewed?
 - c. How did you determine which strategies to employ to address the requirements of HB 1220?
2. Tell me about the city's approach to involving community members or other organizations in combating displacement, racially disparate impacts, or exclusion.
3. How were discrepancies between HB 1220 and local priorities addressed?
4. How were misalignments addressed between what the community wanted and what HB 1220 mandated related to mitigating barriers to housing?
5. What recommendations do you have for other communities as they incorporate the new HB 1220 mandates?
6. Is there anything else you'd like to add?

Appendix B: HB 1220 State Mandate

HB 1220 contained multiple changes to state law. The area most relevant to our analysis is below, particularly (2)(a)(e). Changes made to RCW 36.70A.070 by HB1220 are underlined.

RCW 36.70A.070

2021

- (2) A housing element ensuring the vitality and character of established residential neighborhoods that:
- (a) Includes an inventory and analysis of existing and projected housing needs that identifies the number of housing units necessary to manage projected growth, as provided by the department of commerce, including:
 - (i) Units for moderate, low, very low, and extremely low-income households; and
 - (ii) Emergency housing, emergency shelters, and permanent supportive housing;
 - (b) Includes a statement of goals, policies, objectives, and mandatory provisions for the preservation, improvement, and development of housing, including single-family residences, and within an urban growth area boundary, moderate density housing options including, but not limited to, duplexes, triplexes, and townhomes;
 - (c) Identifies sufficient capacity of land for housing including, but not limited to, government-assisted housing, housing for moderate, low, very low, and extremely low-income households, manufactured housing, multifamily housing, group homes, foster care facilities, emergency housing, emergency shelters, permanent supportive housing, and within an urban growth area boundary, consideration of duplexes, triplexes, and townhomes;
 - (d) Makes adequate provisions for existing and projected needs of all economic segments of the community, including:
 - (i) Incorporating consideration for low, very low, extremely low, and moderate-income households;
 - (ii) Documenting programs and actions needed to achieve housing availability including gaps in local funding, barriers such as development regulations, and other limitations;
 - (iii) Consideration of housing locations in relation to employment location; and
 - (iv) Consideration of the role of accessory dwelling units in meeting housing needs;
 - (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 implements 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 antidisplacement policies, with consideration given to the preservation of historical and cultural communities as well as investments in low, very low, extremely low, and moderate-income housing; equitable development initiatives; inclusionary zoning; community planning requirements; tenant protections; land disposition policies; and consideration of land that may be used for affordable housing.

In counties and cities subject to the review and evaluation requirements of RCW **36.70A.215**, any revision to the housing element shall include consideration of prior review and evaluation reports and any

reasonable measures identified. The housing element should link jurisdictional goals with overall county goals to ensure that the housing element goals are met.

The adoption of ordinances, development regulations and amendments to such regulations, and other non project actions taken by a city that is required or chooses to plan under RCW **36.70A.040** that increase housing capacity, increase housing affordability, and mitigate displacement as required under this subsection (2) and that apply outside of critical areas are not subject to administrative or judicial appeal under chapter **43.21C** RCW unless the adoption of such ordinances, development regulations and amendments to such regulations, or other non project actions has a probable significant adverse impact on fish habitat.

Appendix C: Policy Analysis Decision Tree

Directive vs. Suggestive Language

Step 1. Identify the Grammatical Mood

- A. Is the policy written in the imperative mood? The imperative mood expresses commands or requests. For example, “Build more housing.”
 - If YES, go to Step 2.
 - If NO, continue on Step 1.
- B. Is the policy written in the subjunctive mood? The subjunctive mood expresses possibilities or desires, and is also used in dependent clauses. For example, “the city could build more housing,” or “for the city to address barriers to housing, it is necessary that more housing is built.”
 - If YES, go to Step 2.
 - If NO, the policy must be written in the indicative mood. The indicative mood expresses things as they are. For example, “Housing is built.” These policies are neither directives nor considerations. They rarely occur on their own but may provide context for other policies.

Step 2. Identify the Modal Auxiliary Verbs

- A. Is the policy written using modal auxiliary verbs that express obligation or necessity, such as *should, shall, must, need, or will*?
 - a. If YES, go to step 3.
 - b. If NO, continue on step 2.
- B. Is the policy written using modal auxiliary verbs that express ability or possibility, such as *can, could, may, or might*?
 - a. If YES, the policy is a suggestive policy.
 - b. If NO, go to step 3.

Step 3. Identify the Action Verbs

- A. Is the policy written using action verbs that express exploration, development, or consideration? For example, *study, research, analyze, review, assess, design, draft, consider, explore*, etc.
 - a. If YES, the policy is a Suggestive policy.
 - b. If NO, continue on step 3.
- B. Is the policy written using action verbs that mandate action, regulate behavior, allocate resources, or execute plans? For example, *implement, enforce, establish, build, restrict, fund, invest*, etc.
 - a. If YES, the policy is a directive policy.
 - b. If NO, go to step 4.

Step 4: Consider Implementation

- A. Is the policy written to set goals and aspirations? These policies use suggestive language such as *strive, encourage, support*, etc. They do not direct specific implementation actions.
 - a. If YES, the policy is a suggestive policy.
 - b. If NO, continue on step 3.
- B. Is the policy written to direct implementation actions? These policies use directive language such as *protect, preserve, improve*, etc. They align policy goals with supportive action.
 - a. If YES, the policy is a directive policy.
 - b. If NO, the policy is a suggestive policy.

Action vs. Outcome-Oriented

Step 1. Identify the Policy Goal

- A. Does the policy state a desired outcome or policy goal? For example, reducing homelessness or increasing affordability.
 - a. If YES, go to Step 2.
 - b. If NO, continue on step 1.
- B. Does the policy state an action to be taken? For example, “identify funding opportunities for affordable housing,” or “create incentives for building emergency shelters.”
 - a. If YES, the policy is action-oriented.
 - b. If NO, more information is needed. Policies that are missing both a desired outcome and an action to be taken are rare.

Step 2. Identify the Theory of Change

- A. Does the policy include a mechanism of action to achieve the desired outcome? For example, “reduce homelessness by identifying funding opportunities to build affordable housing and emergency shelters.”
 - a. If YES, the policy is action-oriented.
 - b. If NO, the policy is outcome-oriented.

Detailed vs. General

- 1. Detailed policies identify **who** is implementing the policy. Is it the city council? Is it community organizations? Is it builders?
 - a. Usually written to be the city.
- 2. Detailed policies identify **what** the policy is.
 - a. All policies will have this.
- 3. Detailed policies identify **where** the policy applies. Is it city-wide, or neighborhood-specific? Is it targeted towards certain residents?
- 4. Detailed policies identify **when** the policy happens. This could be a time period, or it could be a conditional marker. For example, “improve housing safety through an expanded code enforcement strategy” tells us that housing safety happens when code enforcement happens. Alternatively, “improve housing safety by the end of 2026” tells us housing safety happens between now and 2026.
- 5. Detailed policies identify **why** the policy is included in the comprehensive plan.
 - a. It could be contextual or explicit in the policy.
- 6. Detailed policies identify **how** the policy will be implemented. If we are encouraging housing, how? If we are identifying funding, how? Etc

Policies that are missing 2 or more detail aspects are conceptual policies.

Appendix D: Policy Analysis Matrices

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Simplified Policy Analysis Matrix										
Dark Green means “Good Practice”. Light Green means “Can improve”. White means “Not Identified”.										
	Dimensions	Kent	Kirkland	Lakewood	Lynnwood	Marysville	Port Orchard	Tacoma	Tukwila	University Place
People	Tenant Protection									
	Homeownership Rates									
	Exclusion									
	Racially Disparate Impacts									
	Emergency Housing									
	Emergency Shelters									
Production	Regulatory Barriers									
	Alternative Housing Models									
	Affordable Housing Requirements									
	Tax Incentive Programs									
	Mixed-Income Housing									
	Accessory Dwelling Units (ADU)									
Preservation	Naturally Occurring Affordable Housing)									
	Mobile Home Parks /Manufactured Homes									

Tenant Protection						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Kent						
SPO1-6: Leverage existing resources that aid in displacement prevention and proactively disseminate that information to residents, including but not limited to foreclosure assistance, legal aid, and tax relief programs.	Directive	<i>Leverage</i> is used to mandate action to aid in displacement prevention and that information dissemination including but not limited to foreclosure assistance, legal aid, and tax relief programs.	Action	The outcomes of <i>aiding in displacement prevention</i> and <i>proactively disseminat[ing] that information to residents</i> are linked to the actions of <i>leverag[ing]</i> existing resources like <i>foreclosure assistance, legal aid, and tax relief programs</i> .	Detailed	Who - The city. What - <i>Aid in displacement prevention and proactively disseminate that information to residents.</i> Where - The city. When - Not identified. Why - <i>Displacement prevention.</i> How - existing resources like <i>foreclosure assistance, legal aid, and tax relief programs.</i>
Kirkland						
H-2.10: Address displacement of existing low-income households with redevelopment by adopting regulations that require landlords to offer tenants relocation assistance, consistent with State and Federal law.	Directive	<i>Address, adopt</i> and <i>require</i> are used to mandate action regarding protecting tenants from displacement.	Action	The outcome of <i>address[ing] displacement of existing low-income households</i> is linked to the action of <i>adopting regulations that require landlords to offer tenants relocation assistance.</i>	Detailed	Who - The city. What - <i>Address displacement of existing low-income households.</i> Where - The city. When - Not identified. Why - To ameliorate the effects of displacement. How - <i>by adopting regulations that require landlords to offer tenants relocation assistance.</i>

Tenant Protection						
Directive v Suggestive			Outcome v Action		Detailed v General	
Category	Reasoning		Category	Reasoning	Category	Reasoning
Lakewood						
No policies identified in this category.						
Lynnwood						
<u>HO 5.3</u> : Advance access to resources on tenant rights and protections including access.	Directive	<i>Advance</i> is used to mandate action to improve access to resources on tenant rights and protections.	Action	The outcome <i>enhancing tenant protections</i> is linked to the action of <i>[advancing] access to resources on tenant rights and protections including access.</i>	General	Who - The city. What - <i>Advance access to resources on tenant rights and protections.</i> Where - The city. When - Not identified. Why - Not identified. How - Not identified.
Marysville						
No policies identified in this category.						
Port Orchard						
No policies identified in this category.						
Tacoma (continues on next page)						
<u>H-2.2</u> : Sustain and increase, when possible, funding for eviction, relocation, and foreclosure prevention programs.	Directive	<i>Sustain and increase</i> are used to mandate action regarding <i>funding for eviction, relocation, and foreclosure prevention programs.</i>	Action	The outcome of addressing <i>eviction, relocation, and foreclosure prevention</i> is linked to the action of <i>sustain[ing] and increas[ing]</i> the funding of programs linked to those topics.	General	Who - The city. What - <i>Sustain and increase funding for eviction, relocation, and foreclosure prevention programs.</i> Where - The city. When - Not identified. Why - Not identified. How - Not identified.

Tenant Protection						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Tacoma (continued from previous page)						
<u>H-2.6</u> : Expand tenant protections by providing resources for households experiencing a crisis, increasing community organizing capacity, and other means.	Directive	<i>Expand</i> and <i>provide</i> are used to mandate action regarding access to <i>resources for households</i> .	Action	The outcome of <i>expand[ing] tenant protections</i> is linked to the action of <i>providing resources for households experiencing a crisis, increasing community organizing capacity, and other means</i> .	General	Who - The city. What - <i>Expand tenant protections</i> . Where - The city. When - Not identified. Why - Not identified. How - <i>by providing resources for households experiencing a crisis, increasing community organizing capacity, and other means</i> .
<u>H-3.4</u> : Implement a resident prioritization policy that applies to both residents and neighborhoods with high displacement risk.	Directive	<i>Implement</i> is used to mandate action towards resident prioritization policy.	Action	It includes a clear implementation action, <i>developing and applying a prioritization policy</i> , to achieve the implied outcome of reducing <i>displacement risk</i> .	General	Who - The city. What - <i>Implement a resident prioritization policy</i> . Where - <i>both residents and neighborhoods with high displacement risk</i> . When - Not identified. Why - Not identified. How - Not identified.

Tenant Protection						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Tukwila						
<u>H4.9</u> : Adopt renter protections to ensure stable housing for Tukwila Renters	Directive	<i>Adopt</i> is used to mandate action to incorporate renter protections.	Action	The outcome of <i>ensuring stable housing for Tukwila Renters</i> is linked to the action of <i>[adopting] renter protections</i> .	Detailed	Who - The city. What - <i>Adopt renter protections</i> . Where - The city. When - Not identified. Why - <i>to ensure stable housing for Tukwila Renters</i> . How - Not identified.
<u>H4.5</u> : Continue to improve the condition of rental housing through administration of the Residential Rental Licensing and Inspection Program.	Directive	<i>Continue</i> is used to mandate the continuation of the Residential Rental Licensing and Inspection Program.	Action	The outcome of <i>improving the condition of rental housing</i> is linked to the action of <i>[administering] the Residential Rental Licensing and Inspection Program</i> .	Detailed	Who - The city. What - <i>improve the condition of rental housing</i> . Where - The city. When - Not identified. Why - Not identified. How - <i>administration of the Residential Rental Licensing and Inspection Program</i> .
University Place						
No policies identified in this category.						

Increasing Homeownership						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Kent						
<p><u>SPO2-13</u>: Boost homeownership at all affordability levels by:</p> <ul style="list-style-type: none"> - Fostering partnerships to utilize community land trusts as a vehicle to ensure land is held in perpetuity for affordable homeownership. - Increasing participation in existing first-time homebuyer programs and resources for new homebuyers by connecting residents to existing programs (such as the Home Advantage Program). - Promoting homeownership opportunities for low- and moderate-income families and individuals while recognizing historic inequities in access to homeownership opportunities for communities of color. 	Directive	Uses language such as <i>boost</i> , <i>fostering</i> , <i>increasing</i> , and <i>promoting</i> to direct action, and clarifies how that action will occur.	Action	The outcome of <i>homeownership at all affordability levels</i> will be achieved by <i>fostering partnerships, connecting residents, and promoting opportunities</i> .	Detailed	<p>Who - The city and community partners.</p> <p>What - <i>Boost homeownership at all affordability levels.</i></p> <p>Where - Partnerships and participation in programs.</p> <p>When - When partnerships are fostered, residents are connected, and homeownership opportunities are promoted.</p> <p>Why - <i>To boost homeownership at all affordability levels.</i></p> <p>How - <i>By fostering partnerships, increasing participation, promoting opportunities, and recognizing historic inequities.</i></p>

Increasing Homeownership						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Kirkland						
H-2.7: Support alternative homeownership models that lower barriers to ownership and provide long-term affordability, such as community land trusts, and limited or shared equity co-ops	Suggestive	<i>Support</i> is used to set goals and aspirations. There is no directive language to implement the support.	Outcome	The outcome of <i>lower barriers to ownership and long-term affordability</i> are achieved by <i>support[ing] alternative homeownership models</i> , but it is not clear what actions would support those models.	Detailed	Who - The city. What - <i>Support alternative homeownership models that lower barriers to ownership and provide long-term affordability.</i> Where - Assumed to be wherever alternative models can be built. When - When <i>alternative homeownership models</i> are supported, <i>barriers to ownership</i> will be lowered and <i>long term affordability will be provided.</i> Why - To <i>lower barriers to ownership and provide long-term affordability.</i> How - Not identified.
Lakewood (continues on next page)						
HO-2.1: Encourage affordable home ownership opportunities for low- and moderate-income households, especially first-time homebuyers	Suggestive	<i>Encourage</i> is used to set goals and aspirations. There is no directive language to implement the encouragement.	Outcome	The outcome of <i>affordable home ownership opportunities for low- and moderate-income households, especially first-time homebuyers</i> is not linked to a mechanism of action.	General	Who - The city. What - Encourage affordable homeownership opportunities. Where - The city. When - Not identified. Why - To encourage affordable homeownership opportunities for low- and moderate-income households, especially first time homebuyers. How - Not identified.

Increasing Homeownership						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Lakewood (continued from previous page)						
<u>TW-3.1</u> : Encourage and support efforts to increase homeownership	Suggestive	<i>Encourage and support</i> are used to set goals and aspirations. There is no directive language to implement the support and encouragement.	Outcome	The outcome of <i>[increased] homeownership</i> is not linked to a mechanism of action.	Detailed	Who - The city. What - <i>Encourage and support efforts to increase homeownership.</i> Where - The Tillicum & Woodbrook neighborhoods. When - Not identified. Why - <i>To increase ownership.</i> How - Not identified.
<u>Action TW-3.1</u> : Provide residents with information on State, County, and local programs that support homeownership for first-time home buyers, veterans, and residents with disabilities, such as down payment assistance	Directive	<i>Provide</i> is used to direct action, and that action is disseminating <i>information on ... programs that support homeownership.</i>	Action	The outcome of <i>homeownership for first-time homebuyers, veterans, and residents with disabilities</i> is achieved by <i>[providing] residents with information.</i>	Detailed	Who - The city. What - <i>Provide residents with information.</i> Where - Not identified. When - When residents are <i>provided with information.</i> Why - <i>To support homeownership for first-time homebuyers, veterans, and residents with disabilities.</i> How - Not identified.

Increasing Homeownership						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Lynnwood						
<u>HO 2.1</u> : Support affordable home ownership and rental opportunities by promoting, through supportive development regulations, an increased supply of lower-cost housing	Suggestive	<i>Support</i> is a word used to set goals and aspirations. <i>Promote</i> is more directive, but it is used to describe <i>support</i> .	Action	The outcome of <i>affordable ownership and rental opportunities</i> is achieved through a specified mechanism of action: <i>supportive development regulations</i> .	Detailed	Who - The city. What - <i>Support affordable ... opportunities.</i> Where - The city When - When <i>supportive development regulations occur</i> , the <i>supply of lower-cost housing</i> will increase. Why - In order to <i>support affordable ... opportunities.</i> How - Not identified.
<u>HO 2.2</u> : Promote and support access to homeownership opportunities for communities of color, recognizing historic inequities which lead to historic racially disparate impacts	Suggestive	<i>Support</i> is a word used to set goals and aspirations. <i>Promote</i> is more directive, but it is used in conjunction with <i>support</i> .	Outcome	The outcomes of <i>homeownership opportunities for communities of color and recognizing historic inequities</i> are not achieved through a specified mechanism of action other than <i>promote and support</i> .	Detailed	Who - The city. What - <i>Promote and support access to homeownership opportunities for communities of color.</i> Where - The city. When - Not identified. Why - To <i>promote and support access to homeownership opportunities for communities of color.</i> How - The details of promotion, support, and recognition are not specified.

Increasing Homeownership						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Marysville						
<u>HAP 1.2</u> : Create more Flexibility for Townhome Development	Directive	<i>Create</i> is used to direct action, although it is not clear how <i>more flexibility</i> will be created.	Outcome	No mechanism of action is specified to achieve the outcome of <i>[creating] more flexibility for townhome development</i> .	General	Who - The city. What - <i>Create more flexibility for townhome development</i> . Where - The city. When - Not identified. Why - Not identified. How - Not identified.
<u>HS 1.4</u> : Recognize historic inequities in access to homeownership opportunities for communities of color.	Suggestive	<i>Recognize</i> is suggestive language used to set goals and aspirations. The goal of <i>recogni[tion]</i> is not supported by specific implementation actions.	Outcome	The policy does not explicitly share the next step after recognition of historic inequities	General	Who - The city. What - <i>Recognize historic inequities in access to homeownership opportunities for communities of color</i> . Where - The city When - Not identified. Why - Not identified. How - Not identified.
Port Orchard						
<u>HS-25</u> : Advocate for additional funding at County, Federal, State, and other levels to expand programs that: facilitate home ownership for low- to moderate -income residents, prevent, avoidable, involuntary evictions and foreclosures, and provide assistance for repair, rehabilitation, energy efficiency, and weatherization.	Directive	<i>Advocate</i> is used to direct action, and it is clear what will be advocated for. Additional detail would be needed to determine specific advocacy actions.	Action	The <i>outcome of additional funding ... to expand programs</i> is achieved through advocacy.	Detailed	Who - The city. What - <i>Advocacy</i> Where - <i>At County, Federal, State, and other levels</i> . When - When advocacy results in additional funding, these programs will be expanded. Why - <i>To facilitate home ownership, prevent evictions and foreclosures, and provide assistance for repair, rehabilitation, energy efficiency, and weatherization</i> . How - Not identified.

Increasing Homeownership						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Tacoma (continues on next page)						
H-3.5: Promote ownership opportunities to qualified first-time homebuyers as a pathway for wealth-building	Directive	Promote is used to direct action. It is not clear how promotion will be implemented.	Action	The outcome of wealth-building is achieved by [promoting] ownership opportunities.	Detailed	Who - The city. What - <i>Promote ownership opportunities .. as a pathway for wealth-building.</i> Where - The city. When - Not identified. Why - Ownership opportunities are a wealth-building path for first-time buyers. How - Not identified.
H-4.4: Preserve affordable homeownership and housing stability for low-income renters in high-opportunity areas through actions such as home improvement loans, down payment assistance, subsidized utility rates, and others	Directive	<i>Preserve</i> is used to direct actions that achieve the desired outcome, and those actions are <i>home improvement loans, down payment assistance, subsidized utility rates, and others.</i>	Action	The outcome of <i>affordable ownership and housing stability for low-income renters in high-opportunity areas</i> is achieved through <i>homeownership loans, down payment assistance, subsidized utility rates, and others.</i>	Detailed	Who - The city. What - <i>Preserve affordable homeownership and housing stability for low income renters.</i> Where - <i>In high-opportunity areas.</i> When - When actions such as <i>home improvement loans, down payment assistance, subsisted utility rates, and others</i> happen, <i>affordable homeownership and housing stability</i> will be preserved. Why - <i>To preserve affordable homeownership and housing stability for low-income renters in high-opportunity areas.</i> How - <i>Through actions such as home improvement loans, down payment assistance, subsidized utility rates, etc.</i>

Increasing Homeownership						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Tacoma (continued from previous page)						
<u>H-5.7</u> : Increase homeownership rates and expand locational choice for BIPOC households and other groups who have been historically under-served and under-represented as homeowners in high opportunity areas	Directive	<i>Increase and expand</i> are used to direct action. It is not clear how this directive will be implemented.	Outcome	The outcome of <i>[increased] homeownership rates and [expanded] locational choice for ... historically under-served and under-represented groups</i> is not linked to a mechanism of action.	Detailed	Who - The city. What - <i>Increase ownership rates and expand locational choice for ... historically under-served and under-represented groups.</i> Where - <i>In high opportunity areas.</i> When - Not identified. Why - <i>To increase ownership rates and expand locational choice for ... historically under-served and under-represented groups...</i> How - Not identified.
<u>H-5.8</u> : Facilitate a variety of ownership opportunities and choices by allowing and supporting the creation of condominiums, cooperatives, mutual housing associations, limited equity cooperatives, community land trusts, and sweat equity.	Directive	<i>Facilitate</i> is used to direct actions that achieve the desired outcome, and those actions are <i>allowing</i> and <i>supporting</i> . It is not clear what actions would be supported, other than allowing the creation of various housing models.	Action	The outcome of a <i>variety of ownership opportunities and choices</i> is linked to the action of <i>the creation of condominiums, cooperatives, mutual housing associations, limited equity cooperatives, community land trusts, and sweat equity.</i>	Detailed	Who - The city. What - <i>Facilitate a variety of ownership opportunities/choices.</i> Where - Where alternative housing models are able to be built. When - <i>When the creation of condominiums, etc., are allowed and supported.</i> Why - <i>To facilitate a variety of ownership opportunities/choices.</i> How - <i>Through allowing and supporting the creation of condominiums, cooperatives, mutual housing associations, limited equity cooperatives, community land trusts, and sweat equity.</i>

Increasing Homeownership						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Tukwila						
H2.6: Expand capacity for moderate density housing, i.e., “missing middle housing”, in residential areas with low-density zoning throughout the City to increase home ownership and rental housing options	Directive	<i>Expand</i> is used to direct action, although it is not clear how the expansion will occur.	Action	The outcome of <i>[increased] home ownership and rental housing options</i> is achieved by <i>[expanding] capacity for moderate density housing</i> .	Detailed	Who - The city. What - <i>Expand capacity for moderate density housing ... to increase home ownership and rental housing options.</i> Where - <i>residential areas with low-density zoning throughout the City.</i> When - Homeownership and rental housing options will increase when <i>[expanded] capacity for moderate density housing happens</i> Why - <i>Expand[ing] capacity for moderate density housing would increase home ownership and rental housing options.</i> How - Not identified.
H4.8: Support programs and City actions that increase homeownership opportunities for vulnerable populations	Suggestive	<i>Support</i> is used to set goals and aspirations. There is no directive language to implement the support.	Outcome	No mechanism of action is specified to <i>support programs .. that increase homeownership opportunities for vulnerable populations.</i>	Detailed	Who - The city. What - <i>Support programs and City actions that increase homeownership opportunities for vulnerable populations.</i> Where - The city. When - Not identified. Why - To increase <i>homeownership opportunities for vulnerable populations.</i> How - Not identified.

Increasing Homeownership						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
University Place						
HS1D: Promote home ownership opportunities for moderate-, low-, very low-, and extremely low income households by allowing for a variety of housing types and densities	Directive	<i>Promote</i> is used to direct action, and that action is <i>allowing for a variety of housing types and densities</i> .	Action	The outcome of <i>homeownership opportunities for moderate-, low-, very low-, and extremely low-income households</i> is achieved by <i>allowing for a variety of housing types and densities</i> .	Detailed	Who - The city. What - <i>Promote homeownership opportunities</i> . Where - Where a variety of housing types and densities are able to be built. When - Not identified. Why - To <i>promote home ownership opportunities for moderate-, low-, very low-, and extremely low-income households</i> . How - Through <i>allowing for a variety of housing types and densities</i> .

Exclusion						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Kent						
H-2.14: Integrate multifamily housing with adjacent lower density neighborhoods through site design, architectural features, pedestrian connectivity, and landscaping	Directive	<i>Integrate</i> is used to direct the action of increasing multifamily housing in adjacent lower density neighborhoods	Action	The action of <i>[integrating] multifamily housing</i> occurs through <i>site design, architectural features, pedestrian connectivity, and landscaping</i>	Detailed	Who - The city. What - <i>Integrate multifamily housing</i> Where - <i>Adjacent to lower density neighborhoods</i> When - Not identified. Why - Not identified. How - <i>Site design, architectural features, pedestrian connectivity, and landscaping</i>
Kirkland						
H-2.27: Ensure equitable distribution of more housing types by removing exclusionary regulations and review processes from the zoning code. Prioritize removing regulatory and permitting barriers that prevent moderate-intensity residential development in lower-intensity neighborhoods.	Directive	<i>Ensure</i> and <i>removing</i> are used to direct the action of removing barriers to different housing types	Action	The action of <i>equitable distribution of more housing types</i> is done by <i>removing exclusionary regulations and [reviewing] process from the zoning code</i>	Detailed	Who - The city. What - <i>Equitable distribution of more housing types</i> Where - <i>Lower-intensity neighborhoods</i> When - Not identified. Why - Not identified. How - <i>Removing exclusionary regulations and review processes</i>

Exclusion						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Lakewood						
<u>DS-4.2</u> : Provide increased densities and regulatory flexibility in Downtown development regulations to attract diverse housing for all ages, abilities, and incomes	Directive	<i>Provide</i> is used to direct the action to increase density Downtown	Action	The action of <i>[attracting]</i> diverse housing is done by <i>[providing]</i> increased densities and regulatory flexibility	Detailed	Who - The city. What - Diverse housing for all ages, abilities, and incomes Where - Downtown When - Not identified. Why - Not identified. How - Increased densities and regulatory flexibility
Lynnwood						
<u>HO 5.2</u> : Review inclusionary zoning to advance updates of the Lynnwood Housing Action Plan.	Suggestive	Review mandates exploration but not specific follow-up action	Outcome	The outcome of <i>updates</i> to the <i>Lynnwood Housing Action Plan</i> is done by <i>[reviewing]</i> inclusionary zoning	General	Who - The city. What - Inclusionary zoning Where - Not identified. When - Not identified. Why - Updates of the Lynnwood Housing Action Plan How - Not identified.
Marysville						
<u>HS 1.7</u> : Continue to promote and recalibrate existing housing incentives (e.g. Downtown Multifamily Tax Exemption, Residential Density Incentives, etc.) and pursue new ones while giving consideration to inclusionary and incentive zoning to increase housing capacity and affordable housing.	Directive	<i>Promote, recalibrate,</i> and <i>pursue</i> are used to direct the action to increase housing capacity and affordable housing	Action	The action of <i>[promoting]</i> and <i>[recalibrating]</i> existing housing incentives are done by (<i>Downtown MFTE, Residential Density Incentives</i>) and how to pursue new ones	General	Who - The city. What - Housing incentives Where - Not identified. When - Not identified. Why - Not identified. How - Giving consideration to inclusionary and incentive housing

Exclusion						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Port Orchard						
<u>HS-13</u> : Expand capacity for middle housing in low -density residential neighborhoods that are unencumbered by critical areas or their buffers throughout the city to increase home ownership and rental housing options. (RCW 36.70A.635).	Directive	<i>Expand to increase home ownership and rental housing options</i>	Action	The action of <i>[increasing] home ownership and rental housing options</i> is done by <i>[expanding] capacity for middle housing</i>	Detailed	Who - The city. What - <i>Middle housing</i> Where - <i>In low-density neighborhoods</i> When - Not identified. Why - <i>Increase home ownership and rental housing options</i> How - <i>Expand capacity</i>
Tukwila						
<u>H2.6</u> : Expand capacity for moderate density housing, i.e., “missing middle housing”, in residential areas with low-density zoning throughout the City to increase home ownership and rental housing options.	Directive	<i>Expand</i> is used to direct action, although it is not clear how the expansion will occur.	Action	The outcome of <i>[increased] home ownership and rental housing options</i> is achieved by <i>[expanding] capacity for moderate density housing</i> .	Detailed	Who - The city. What - <i>Expand capacity for moderate density housing ... to increase home ownership and rental housing options.</i> Where - <i>residential areas with low-density zoning throughout the City.</i> When - Homeownership and rental housing options will increase when <i>[expanded] capacity for moderate density housing happens</i> Why - <i>Expand[ing] capacity for moderate density housing would increase home ownership and rental housing options.</i> How - Not identified.

Exclusion						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Tacoma						
<u>H-4.4</u> : Preserve affordable homeownership and housing stability for low-income renters in high-opportunity areas through actions such as home improvement loans, down payment assistance, subsidized utility rates, and others.	Directive	<i>Preserve</i> is used to direct actions that achieve the desired outcome, and those actions are <i>home improvement loans, down payment assistance, subsidized utility rates, and others</i> .	Action	The outcome of <i>affordable ownership and housing stability for low-income renters in high-opportunity areas</i> is achieved through <i>homeownership loans, down payment assistance, subsidized utility rates, and others</i> .	Detailed	Who - The city. What - <i>Preserve affordable homeownership and housing stability for low income renters</i> . Where - In high-opportunity areas. When - When actions such as <i>home improvement loans, down payment assistance, subsisted utility rates, and others</i> happen, <i>affordable homeownership and housing stability</i> will be preserved. Why - To <i>preserve affordable homeownership and housing stability for low-income renters in high-opportunity areas</i> . How - Through actions such as <i>home improvement loans, down payment assistance, subsidized utility rates, etc</i> .
University Place						
<u>HS3K</u> : Consider inclusionary zoning measures as a condition of major rezones and development	Suggestive	<i>Consider</i> allows the city to partially implement or not implement the policy	Action	The outcome of <i>inclusionary zoning</i> could occur during <i>major rezones and development</i>	General	Who - The city. What - <i>Inclusionary zoning measures</i> Where - Not identified. When - <i>Major rezones and development</i> Why - Not identified. How - Not identified.

Racially Disparate Impacts						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Kent						
H-5.6: Collaborate with other local, regional, and statewide entities to monitor success and progress of incentives, initiatives, and development and to ensure policies are working as intended to address racially disparate impacts, displacement risk, and 20-year population allocations. Amend strategies and actions as needed based on monitoring outcomes.	Directive	<i>Collaborate, monitor, ensure, and amend</i> direct multiple different actions	Action	The action of <i>[addressing] racially disparate impacts, displacement risk, and 20-year population allocations</i> is done by <i>[collaborating] with others to monitor success and progress to ensure policies are working as intended</i>	Detailed	Who - The city. What - <i>Monitor programs and policies</i> Where - Not identified. When - Not identified. Why - <i>Assess appropriate impact</i> How - <i>Collaboration with other entities</i>
Kirkland						
H-2: Achieve racially and socially equitable outcomes in housing, preventing homelessness by preventing displacement, meet the needs of all current and future residents and ensure people with the lowest incomes have quality housing that is accessible and affordable in the communities of their choice	Directive	<i>Achieve, prevent, meet, and ensure</i> direct the action to ensure <i>racially and socially equitable outcomes</i>	Outcome	The outcome of <i>[achieving] racially and socially equitable outcomes</i> is stated with no specific action	General	Who - The city. What - <i>Equitable outcomes in housing</i> Where - Not identified. When - Not identified. Why - Not identified. How - Not identified.

Racially Disparate Impacts						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Lakewood						
<u>PS-16.1</u> : Ensure the representation of culturally and economically diverse groups, including youth, people of color, seniors, and the disabled, in publicly appointed committees working on human services needs	Directive	<i>Ensure</i> mandates an action to include <i>people of color in publicly appointed committees working on human services needs</i> such as housing	Outcome	The outcome of <i>representation of culturally and economically diverse groups in publicly appointed committees</i> does not have a corresponding action	General	Who - The city. What - <i>Diverse groups in committees</i> Where - Not identified. When - Not identified. Why - Not identified. How - Not identified.
Lynnwood						
<u>HO 2.2</u> : Promote and support access to homeownership opportunities for communities of color, recognizing historic inequities which lead to historic racially disparate impacts.	Suggestive	<i>Support</i> is a word used to set goals and aspirations. <i>Promote</i> is more directive, but it is used in conjunction with <i>support</i> .	Outcome	The outcomes of <i>homeownership opportunities for communities of color and recognizing historic inequities</i> are not achieved through a specified mechanism of action other than <i>promote and support</i>	General	Who - The city. What - <i>Promote and support access to homeownership opportunities for communities of color.</i> Where - Not identified. When - Not identified. Why - <i>To promote and support access to homeownership opportunities for communities of color.</i> How - The details of promotion, support, and recognition are not specified.

Racially Disparate Impacts						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Marysville						
<u>HS 1.4</u> : Recognize historic inequities in access to homeownership opportunities for communities of color "The City will use this information to inform potential mitigation measures that can be taken to protect vulnerable populations from displacement."	Suggestive	<i>Recognize</i> is suggestive language used to set goals and aspirations. The goal of <i>recogni[tion]</i> is not supported by specific implementation actions.	Outcome	The outcomes of <i>[recognizing] historic inequities in access to homeownership opportunities for communities of color</i> and <i>[informing] mitigation measures</i> do not have associated actions	General	Who - The city. What - <i>Recognize historic inequities in access to homeownership opportunities for communities of color.</i> Where - Not identified. When - Not identified. Why - Not identified. How - Not identified.
Port Orchard						
<u>ED-16</u> : Establish relationships with community stakeholder groups to better understand how local and regional policies affect City residents, particularly as they relate to people of color and people with low incomes.	Directive	<i>Establish</i> directs the action for the city to engage with community stakeholder groups to better understand people of color	Action	The action of <i>[understanding] how local and regional policies affect City residents, particularly as they relate to people of color</i> is done by <i>[establishing] relationships with community stakeholder groups</i>	Detailed	Who - The city. What - <i>Relationships with community stakeholder groups</i> Where - Not identified. When - Not identified. Why - <i>Better understand impact of policies on people of color and people with low incomes</i> How - Not identified.

Racially Disparate Impacts						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Tacoma						
<u>H-3.11</u> : Engage with BIPOC community members, and others who have been historically under-represented, in policymaking. Provide stronger community based roles for policy design and implementation of anti-displacement policies.	Suggestive	The use of <i>engage</i> does not express the depth of action needed to receive direct input from BIPOC community members in policymaking	Action	The action of <i>[providing] stronger community based roles</i> is done by <i>[engaging] with BIPOC community members, and others who have been historically under-represented, in policymaking</i>	Detailed	Who - The city. What - <i>Policymaking</i> Where - Not identified. When - Not identified. Why - <i>Historically under-represented</i> How - <i>Engage with BIPOC community members</i>
Tukwila						
<u>H4.1</u> : Identify and take action to remove City policies, rules, and programs that exacerbate racially disparate impacts	Directive	<i>Identify, take, and remove</i> directs the action to <i>remove City policies, rules, and programs that exacerbate racially disparate impacts</i>	Action	The outcome of not <i>[exacerbating] racially disparate impacts</i> is done by <i>[removing] City policies, rules, and programs</i>	Detailed	Who - The city What - <i>City policies, rules, and programs</i> Where - The city When - Not identified. Why - <i>Racially disparate impacts</i> How - <i>Identify and remove</i>

Racially Disparate Impacts						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
University Place						
LU9E: Address potential health impacts associated with industrial uses under the SEPA process or when environmental impact assessment is required, especially to surrounding residential land uses with communities of color and areas with higher concentrations of low-income, non-English speaking, seniors, youth, and disabled populations.	Directive	<i>Address directs the action to look into potential health impacts to communities of color and areas with higher concentrations of non-English speaking populations</i>	Outcome	The outcome of <i>[addressing] potential health impacts</i> does not have a particular action attached	General	Who - The city. What - <i>Potential health impacts</i> Where - Not identified. When - <i>SEPA process or environmental impact assessment</i> Why - Not identified. How - Not identified.

Emergency Housing						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Kent						
H-2.7: Be proactive in the siting and development of emergency, transitional, and permanent supportive housing options, and periodically assess land capacity to ensure sufficient land is available for such uses.	Directive	Assess is directive language.	Action	Being proactive in siting and development of housing options and periodically assessing land capacity are both action-oriented language.	Detailed	Who - The city. What - Siting and development of emergency, transitional, and permanent supportive housing. Where - The city. When - Not identified. Why - Ensure land is available. How - Periodically assessing land capacity.
Kirkland (continues on following pages)						
Policy H-1.14: Collaborate with diverse partners (e.g., employers, financial institutions, philanthropic, faith, and community-based organizations) on provision of resources such as funding or surplus property (not designated or intended to be designated for Parks or Open Space) and programs to meet Kirkland's allocated housing need for households with extremely low-, very low-, and low-incomes, and emergency housing.	Directive	Collaborate is directive language.	Action	Collaborating with diverse partners to meet housing needs is action-oriented language.	Detailed	Who - The city. What - Meet housing needs. Where - The city. When - Not identified. Why - Meet housing needs for extremely low, very low, and low-income households. How - Collaborating with diverse partners on provision of resources.

Emergency Housing						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Kirkland (continued from previous page, continued on next page)						
Policy H-2.29: Monitor the city's progress towards eliminating disparities in access to housing and neighborhood choices and meeting the allocated housing targets by income segment and emergency housing through the city's housing dashboard, annually reporting the city's progress to the King County Growth Management Planning Council, and making the necessary policy, program, or regulatory adjustments to achieve housing equity, access, and supply.	Directive	Monitor is directive language.	Action	"annually reporting the city's progress to the King County Growth Management Planning Council, and making the necessary policy, program, or regulatory adjustments to achieve housing equity, access, and supply" is action-oriented language.	Detailed	Who - The city. What - Achieve housing equity, access, and supply. Where - The city. When - Not identified. Why - To achieve housing equity, access, and supply. How - Monitoring the city's progress and annually reporting to the King County Growth Management Planning Council.

Emergency Housing						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Kirkland (continued from previous page)						
Policy H-1.5: Support persons and families experiencing homelessness in moving towards housing stability by prioritizing local, regional, state, and federal resources, developing specialized standards that enable the production, reduce the cost, and explore removal of regulatory barriers that prevent or obstruct the creation and equitable distribution of transitional housing, emergency shelters, permanent supportive housing and similar facilities in areas of the city with sufficient infrastructure, services, and amenity capacity that supports these housing types. Adjust development standards based on learnings from any such housing facilities that exist in the City.	Directive	<i>Support, prioritizing, developing, explore, and adjust</i> are directive language.	Action	"Enable the production, reduce the cost, and explore removal of regulatory barriers that prevent or obstruct the creation and equitable distribution of transitional housing, emergency shelters, permanent supportive housing..." is action-oriented language.	Detailed	Who - The city. What - Creation and equitable distribution of housing. Where - The city. When - Not identified. Why - To support persons and families experiencing homelessness. How - Prioritizing resources and developing specialized standards.

Emergency Housing						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Lakewood						
<u>HO-6</u> : Ensure that sufficient options for emergency housing needs are provided.	Suggestive	<i>Ensure</i> is suggestive language.	Outcome	No action-oriented steps provided.	Detailed	Who - The city. What - Provide emergency housing. Where - The city. When - Not identified. Why - Not identified. How - Ensuring options are provided.
<u>HO-6.1</u> : Maintain sufficient land capacity for the development of permanent supportive housing, transitional housing, and emergency housing.	Directive	<i>Maintain</i> sufficient land capacity is directive.	Outcome	No action-oriented steps provided.	Detailed	Who - The city. What - Development of housing. Where - The city. When - Not identified. Why - Not identified. How - Maintaining sufficient land capacity.
Lynnwood						
No policies identified in this category.						
Marysville						
<u>HAP Action 4.1</u> : Partner with Nonprofits on Permanent Supportive Housing	Directive	<i>Partner</i> is directive language.	Outcome	Does not specify what to accomplish.	General	Who - The city. What - Partner with nonprofits. Where - The city. When - Not identified. Why - Not identified. How - Not identified.

Emergency Housing						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Port Orchard						
<u>Policy HS- 29</u> : Strengthen coordination between the City, county, and service providers to provide homelessness support service and outreach. Adopt a Housing First approach.	Directive	<i>Strengthen coordination</i> is directive language.	Action	Strengthening coordination to provide homelessness support is action-oriented language.	General	Who - The city. What - Provide homelessness support and adopt a housing first approach. Where - The city. When - Not identified. Why - Not identified. How - Not identified.
Tacoma						
<u>Policy H-1.5</u> : Encourage a robust and diverse supply of affordable, accessible housing to meet the needs of special populations, including emergency housing, emergency shelters, transitional housing, and permanent supportive housing for individuals and families experiencing homelessness, especially in centers and other places in close proximity to services and transit.	Suggestive	<i>Encourage</i> is suggestive language.	Action	Encourage supply of housing to meet the needs of those experiencing homelessness is action-oriented language.	Detailed	Who - The city. What - Meet the needs of special populations. Where - The city. When - Not identified. Why - Meet the needs of special populations. How - Encourage a diverse supply of housing options.

Emergency Housing						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Tukwila						
<u>H2.4</u> : Support the development of emergency housing, emergency shelters, and permanent supportive housing sufficient to meet adopted targets, and ensure that City regulations guiding such development are consistent with state and regional guidance.	Directive	<i>Support</i> the development of emergency housing is directive language.	Action	Supporting the development of emergency housing to meet adopted targets and ensuring regulatory compliance.	Detailed	Who - The city. What - Support the development of emergency housing. Where - The city. When - Not identified. Why - To meet adopted targets and ensure compliance with regional and state guidance. How - Support the development of emergency housing.
<u>H2.5</u> : Support siting of transitional housing and permanent supportive housing in any zones in which residential dwelling units or hotels are allowed, and siting of indoor emergency shelters and indoor emergency housing in any zone where hotels are allowed in accordance with state law.	Directive	<i>Support</i> siting of transitional housing and permanent supportive housing is directive language.	Action	Supporting the siting of transitional housing and permanent supportive housing is action-oriented language.	Detailed	Who - The city. What - The siting of transitional housing and permanent supportive housing. Where - Any zones where residential dwelling units or hotels are allowed. When - Not identified. Why - Not identified. How - Support.
University Place						
<u>Policy HS4B</u> : Encourage and support the development of emergency, transitional and permanent supportive housing with appropriate on-site services.	Suggestive	<i>Encourage and support</i> are suggestive language.	Outcome	No action-oriented steps provided.	Detailed	Who - The city. What - Development of emergency and permanent supportive housing. Where - The city. When - Not identified. Why - Not identified. How - Encourage and support.

Emergency Shelters						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Kent						
H-2.8: Allow for development of indoor emergency facilities in all zones where hotels are allowed through clear and objective standards that are consistent with state law.	Directive	This policy directs the city to allow the development of emergency facilities.	Outcome	No action-oriented steps are present, only the outcome of emergency facility development.	Detailed	Who - The city. What - The development of indoor emergency facilities. Where - Zones where hotels are allowed. When - Not identified. Why - Not identified. How - Allowing development.
Kirkland						
Goal H-3: Achieve sustainable subsidy and collaboration with local, regional, and state partners to build and preserve affordable housing, assist in rapid rehousing, and provide subsidy for households experiencing housing insecurity or homelessness.	Directive	This policy directs the city to achieve sustainable subsidy and partner collaboration.	Action	<i>Build, preserve, and assist</i> are action-oriented language.	Detailed	Who - The city. What - Build, preserve, assist. Where - The city. When - Not identified. Why - Provide for households experiencing housing insecurity or homelessness. How - Collaborate.
Policy H-2.26: Coordinate with other departments, providers, and other key stakeholders to foster comprehensive, appropriate, and proactive responses for individuals and households experiencing homelessness or housing instability.	Directive	<i>Coordinate</i> is directive language.	Action	Proactive responses is action-oriented language.	Detailed	Who - The city. What - Respond to households experiencing housing insecurity or homelessness. Where - The city. When - Not identified. Why - Not identified. How - Coordinate.

Emergency Shelters						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Lakewood						
<u>HO-1.3</u> : Plan to the 2020–2044 County target allocations for 574 spaces in emergency shelter.	Directive	<i>Plan</i> is directive language.	Action	Planning for the 574 emergency shelters spaces is action-oriented language.	General	Who - The city. What - Allocate 574 spaces. Where - The city. When - Not identified. Why - Not identified. How - Plan.
<u>HO-6.3</u> : Coordinate supporting services related to homelessness and domestic violence with emergency shelters.	Directive	<i>Coordinate</i> is directive language.	Outcome	No action-oriented steps are present.	General	Who - The city. What - Supporting services for emergency shelters. Where - The city. When - Not identified. Why - Not identified. How - Coordinate.
Lynnwood						
<u>HO Policy 3.3</u> : Support nonprofit organizations, housing and service providers, and other regional groups to provide a coordinated effort contact and provide shelter to populations that require special needs housing.	Directive	<i>Support</i> is used to direct the city to work with regional groups to provide shelters.	Action	<i>Support</i> is used to direct the city to work with regional groups to provide shelters.	Detailed	Who - The city. What - To provide shelter. Where - Presumes shelter-zoned areas of the city. When - Not identified. Why - For groups that require shelter. How - Supporting regional groups.

Emergency Shelters						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Marysville						
HAP Action 4.2: Consider Emergency Shelter Needs in Marysville Marysville does not currently have a year-round emergency shelter outside of ad hoc cold-weather shelters that open during extreme weather events. Emergency shelters provide a safe and secure environment for those experiencing homelessness. The City may wish to pursue emergency shelters for those experiencing homelessness in Marysville. An initial step would be to better understand shelter needs within the City so that appropriate services are provided. Coordinating with Snohomish County and other service providers on the demographics of those experiencing homelessness would be important in this effort.	Suggestive	<i>Consider</i> is suggestive language.	Action	Provides the action-oriented steps the city may pursue.	Detailed	Who - The city. What - Pursue emergency shelters. Where - Presumes shelter-zoned areas of the city. When - Not identified. Why - So appropriate services are provided. How - Through the provided steps.

Emergency Shelters						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Port Orchard						
<u>Policy HS- 6</u> : Coordinate with other public entities, nonprofits, and religious organizations to preserve and facilitate development of permanent supportive housing, emergency shelters, and emergency housing.	Directive	<i>Coordinate</i> is directive language.	Action	Facilitating development is action-oriented language.	Detailed	Who - The city. What - Preserve and facilitate development. Where - The city. When - Not identified. Why - Not identified. How - Coordinate.
Tacoma						
<u>Policy H-1.5</u> : Encourage a robust and diverse supply of affordable, accessible housing to meet the needs of special populations, including emergency housing, emergency shelters, transitional housing, and permanent supportive housing for individuals and families experiencing homelessness, especially in centers and other places in close proximity to services and transit.	Suggestive	<i>Encourage</i> is suggestive language.	Outcome	No action-oriented language is present.	Detailed	Who - The city. What - Meet the needs of special populations. Where - The city. When - Not identified. Why - Not identified. How - Encourage supply.

Emergency Shelters						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Tukwila						
<u>H2.4</u> : Support the development of emergency housing, emergency shelters, and permanent supportive housing sufficient to meet adopted targets, and ensure that City regulations guiding such development are consistent with state and regional guidance.	Directive	<i>Support</i> is used to direct the city to develop emergency shelters and meet adopted targets and state and regional guidance.	Outcome	No action-oriented steps are present.	Detailed	Who - The city. What - Development of emergency shelters. Where - The city. When - Not identified. Why - To meet adopted targets and state and regional guidance. How - Supporting the development.
<u>H2.5</u> : Support siting of transitional housing and permanent supportive housing in any zones in which residential dwelling units or hotels are allowed, and siting of indoor emergency shelters and indoor emergency housing in any zone where hotels are allowed in accordance with state law.	Directive	<i>Support</i> is used to direct the city to allow the siting of indoor emergency shelters in any zone where hotels are allowed.	Outcome	No action-oriented steps are present.	Detailed	Who - The city. What - The siting of emergency shelters. Where - Any zone where hotels are allowed. When - Not identified. Why - In accordance with state law. How - Supporting the siting.
University Place						
<u>Policy HS4C</u> : Develop a strategy or action plan to secure grants and loans by agencies, private developers and nonprofit organizations that are tied to the provision of permanent supportive housing, emergency shelter beds, transitional housing, and other housing serving at risk populations.	Directive	<i>Develop</i> is directive language.	Action	<i>Secure</i> and <i>develop</i> are action-oriented language.	Detailed	Who - The city. What - Secure grants. Where - The city. When - Not identified. Why - Not identified. How - Developing a strategy or action plan.

Regulatory Barriers						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Kent						
H-4.1: Regularly review development standards and processes to identify and remove constraints or barriers that may hinder the development of diverse, affordable, and accessible housing supply, especially for lower-income households. Allow more flexibility to encourage compact infill development and innovative site design.	Directive	<i>Review</i> is used to mandate action to identify and remove constraints or barriers that may hinder the development.	Action	The outcome of increasing the supply of diverse, affordable, and accessible housing is linked to the actions of reviewing development standards and removing barriers.	Detailed	Who - The city. What - review development standards and processes to identify and remove constraints or barriers Where - The city. When - Regularly Why - to avoid hindering the development of diverse, affordable, and accessible housing supply, especially for lower-income households How - Not identified.
H-4.3: Ensure streamlined, timely, and coordinated processing of residential projects to minimize holding costs and encourage housing production. Continuously explore and implement further process improvements as necessary.	Directive	<i>Ensure</i> is used to mandate action regarding streamlined, timely, and coordinated processing of residential projects.	Action		Detailed	Who - The city. What - Ensure streamlined, timely, and coordinated processing of residential projects Where - The city. When - Continuously Why - to minimize holding costs and encourage housing production How - Not identified.

Regulatory Barriers						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Kirkland						
Policy H-1.3: Adopt development and environmental regulations that reduce the cost of building and stimulate the production of diverse types of housing at various development intensities, in ways that maintain or improve health, safety and environmental quality both for market rate and affordable housing.	Directive	<i>Adopt</i> is used to mandate action regarding development and environmental regulations that reduce the cost of building.	Action	The outcome of stimulating the production of diverse housing types while maintaining or improving health, safety, and environmental quality is linked to the action of adopting development and environmental regulations that reduce building costs.	Detailed	Who - The city. What - Adopt development and environmental regulations Where - The city. When - Not identified. Why - To reduce the cost of building and stimulate the production of diverse types of housing at various development intensities How - in ways that maintain or improve health, safety and environmental quality both for market rate and affordable housing.
Policy H-1.4: Reduce the cost of building diverse types of market rate and affordable housing by speeding up, simplifying, and making permitting housing more predictable and transparent to permit applicants with expected permit review timelines and revision cycles.	Directive	<i>Reduce</i> is used to mandate action regarding the cost of building diverse types of market rate and affordable housing.	Action	<i>The outcome of reducing the cost of building diverse types of market rate and affordable housing</i> is linked to the action of <i>speeding up, simplifying, and making permitting housing more predictable and transparent to permit applicants.</i>	Detailed	Who - The city. What - Reduce the cost of building diverse types of market rate and affordable housing Where - The city. When - Not identified. Why - by speeding up, simplifying, and making permitting housing more predictable and transparent to permit applicants How - with expected permit review timelines and revision cycles.

Regulatory Barriers						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Lakewood						
HO-2.6: Provide flexibility in development regulations to promote innovative housing types that help meet city housing goals.	Directive	<i>Provide</i> is used to mandate action regarding flexibility in development regulations.	Action	The outcome of <i>meet[ing] city housing goals</i> is linked to the action of <i>provid[ing] flexibility in development regulations to promote innovative housing types</i> .	Detailed	Who - The city. What - Provide flexibility in development regulations Where - The city. When - Not identified. Why - to promote innovative housing types that help meet city housing goals. How - Not identified.
HO-4.1: Support flexible site designs and innovative housing types to help meet housing needs in the community.	Suggestive	<i>Support</i> is used to suggest assistance and promote options without mandating a specific action.	Action	The outcome of <i>meet[ing] housing needs in the community</i> is linked to the action of <i>support[ing] flexible site designs and innovative housing types</i> .	Detailed	Who - The city. What - Support flexible site designs and innovative housing types Where - The city. When - Not identified. Why - to help meet housing needs in the community. How - Not identified.
HO-D: Review the Building Code and Fire Code to determine options for reducing building costs and improving the efficiency of development without compromising the health and safety of building occupants. (Implementation Steps as an Action not policy)	Directive	<i>Review</i> is used to mandate action regarding the Building Code and Fire Code.	Action	The outcome of <i>reducing building costs and improving development efficiency without compromising safety</i> is linked to the action of <i>reviewing the Building Code and Fire Code to determine options</i> .	Detailed	Who - The city. What - Review the Building Code and Fire Code Where - The city. When - Not identified. Why - to determine options for reducing building costs and improving the efficiency of development How - without compromising the health and safety of building occupants.

Regulatory Barriers						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Lynnwood						
HO Policy 1.3: Periodically review the Zoning Code (Title 21 LMC) to remove unnecessary development obstacles and to allow greater innovation in design and construction.	Directive	Review is used to mandate action to remove unnecessary development obstacles	Action	The outcome of <i>allow[ing] greater innovation in design and construction</i> is linked to the action of <i>periodically review[ing] the Zoning Code to remove unnecessary development obstacles.</i>	Detailed	Who - The city. What - Review the Zoning Code. Where - The city. When - Periodically . Why - To remove unnecessary development obstacles and to allow greater innovation in design and construction.. How - Not identified.
Marysville						
No policies identified in this category.						
Port Orchard						
Policy LU- 21: Continue to review zoning, subdivision, and street regulations for barriers to low -impact development. Encourage the minimization of impervious surface areas in development.	Directive	Continue is used to mandate action regarding the review process for reviewing zoning, subdivision, and street regulations for barriers to low -impact development.	Action	The outcome of supporting low-impact development is linked to the actions of <i>review[ing] zoning, subdivision, and street regulations</i> and <i>encourag[ing] the minimization of impervious surface areas.</i>	General	Who - The city. What - review zoning, subdivision, and street regulations for barriers to low -impact development. Where - The city. When - Not identified. Why - Not identified. How - Not identified.

Regulatory Barriers						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Tacoma						
<u>Policy H-1.10</u> : Review and update City permitting and processes, as well as available education and technical support, to streamline the homebuilding process for developers and the public.	Directive	<i>Review and update</i> are used to mandate action regarding the City permitting and processes.	Action	The outcome of <i>streamlin[ing] the homebuilding process</i> is linked to the action of <i>review[ing] and updat[ing] City permitting processes as well as available education and technical support.</i>	Detailed	Who - The city. What - Review and update City permitting and processes Where - The city. When - Not identified. Why - to streamline the homebuilding process for developers and the public How - Not identified.
Tukwila						
<u>H1.2</u> : Identify and remove excessive regulatory barriers to housing production.	Directive	<i>Identify</i> is used to mandate action to remove excessive regulatory barriers to housing production.	Action	The outcome of increased housing production is linked to the action of <i>identify[ing] and removing excessive regulatory barriers.</i>	Detailed	Who - The city. What - Identify and remove excessive regulatory barriers Where - The city. When - Not identified. Why - to increase housing production. How - Not identified.
<u>H1.5</u> : Align development regulations to market conditions to reduce reliance on time and funding-intensive development agreements.	Directive	<i>Align</i> is used to mandate action in terms of development regulations to reduce reliance on time and funding-intensive development agreements.	Action	The outcome of <i>reduc[ing] reliance on time and funding-intensive development agreements</i> is linked to the action of <i>align[ing] development regulations with market conditions.</i>	Detailed	Who - The city. What - Align development regulations to market conditions Where - The city. When - Not identified. Why - to reduce reliance on time and funding-intensive development agreements. How - Not identified.

Regulatory Barriers						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
University Place						
No policies identified in this category.						

Alternative Housing Models						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Kent						
H-2.10: Explore alternative models of housing ownership (e.g. housing co-operatives, lease to own, community land trusts, etc.) and implement programs where feasible and fiscally appropriate, aiming to expand housing ownership opportunities for low- and moderate-income residents.	Suggestive	<i>Explore</i> is used to set goals and aspirations. There is no directive language to implement the support.	Outcome	The outcome of <i>exploring alternative housing ownership models and implement[ing] programs where feasible and fiscally appropriate</i> is not linked to a specific action.	Detailed	Who - The city. What - Explore alternative models of housing ownership Where - assumed wherever new housing can be built When - Not identified. Why - to expand housing ownership opportunities for low- and moderate income residents How - Not identified.
H-2.3: Facilitate the development of affordable rental housing and long-term homeownership opportunities for older adults, low-income households, large families, individuals with disabilities, and other identified special housing need groups	Suggestive	<i>Facilitate</i> is used to set goals and aspirations. There is no directive language to implement the support.	Outcome	The outcome of <i>developing affordable rental housing and long-term homeownership</i> is not linked to a specific action.	General	Who - The city. What - Facilitate development of affordable rental housing and long-term homeownership opportunities Where - assumed wherever new housing can be built When - Not identified. Why - Not identified. How - Not identified.

Alternative Housing Models						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Kirkland						
<u>H-2.7</u> : Support alternative homeownership models that lower barriers to ownership and provide long-term affordability, such as community land trusts, and limited or shared equity coops.	Suggestive	<i>Support</i> is used to set goals and aspirations. There is no directive language to implement the support.	Outcome	The outcome of <i>lower barriers to ownership</i> and <i>long-term affordability</i> are achieved by <i>support[ing] alternative homeownership models</i> , but is not clear what actions would support those models.	Detailed	Who - The city. What - Support alternative homeownership models that lower barriers to ownership and provide long-term affordability Where - assumed wherever new housing can be built When - When <i>alternative homeownership models</i> are supported, <i>barriers to ownership</i> will be lowered and <i>long term affordability will be provided</i> . Why - to lower barriers to ownership and provide long-term affordability How - Not identified.
Lakewood						
<u>HO-4.6</u> : Encourage alternative ownership models such as co-housing to support housing access.	Suggestive	<i>Encourage</i> is used to set goals and aspirations. There is no directive language to implement the encouragement.	Outcome	The outcome of <i>alternative homeownership models ... to support housing access</i> is not linked to a specific action.	Detailed	Who - The city. What - encourage alternative ownership models Where - assumed wherever new housing can be built When - Not identified. Why - To support housing access How - Not identified.

Alternative Housing Models						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
HO-4.3: Encourage the construction of cottages and cottage housing developments with site design incentives.	Suggestive	<i>Encourage</i> is used to set goals and aspirations. There is no directive language to implement the encouragement.	Action	The outcome of <i>construction of cottages and cottage housing developments</i> is achieved through <i>site design incentives</i> .	Detailed	Who - The city. What - encourage construction of cottages Where - assumed wherever new housing can be built When - Not identified. Why - To support housing access How - "site design incentives"
Lynnwood						
No policies identified in this category.						
Marysville						
No policies identified in this category.						
Port Orchard						
No policies identified in this category.						
Tacoma (continues on following pages)						
H-5.4: Encourage income diversity across the city by allowing a mix of housing types and tenures in all neighborhoods.	Directive	<i>Encourage</i> is used to set goals and aspirations, but supported by directive action of allowing a mix of housing types and tenures in all neighborhoods.	Action	The outcome of <i>income diversity across the city</i> is achieved by <i>allowing a mix of housing types and tenures in all neighborhoods</i> .	Detailed	Who - The city. What - Encourage income diversity across the city Where - In all neighborhoods When - When a mix of housing types and tenures are allowed in all neighborhoods, income diversity will be encouraged Why - to meet housing needs for all income levels How - by allowing a mix of housing types and tenures in all neighborhoods

Alternative Housing Models						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Tacoma (continued from previous page)						
<u>H-5.8</u> : Facilitate a variety of ownership opportunities and choices by allowing and supporting the creation of condominiums, cooperatives, mutual housing associations, limited equity cooperatives, community land trusts, and sweat equity.	Directive	<i>Facilitate</i> is used to direct actions that achieve the desired outcome, and those actions are <i>allowing</i> and <i>supporting</i> . It is not clear what actions would be supported, other than allowing the creation of various housing models.	Action	The outcome of a <i>variety of ownership opportunities</i> linked to the action of <i>supporting the creation of condominiums, cooperatives, mutual housing associations, limited equity cooperatives, community land trusts, and sweat equity</i> .	Detailed	Who - The city. What - Facilitate a variety of ownership opportunities Where - where alternative housing models are able to be built When - Not identified. Why - To <i>facilitate a variety of ownership opportunities/choices</i> . How - by allowing and supporting the creation of condominiums, cooperatives, mutual housing associations, limited equity cooperatives, community land trusts, and sweat equity
Tukwila						
<u>H5.7</u> : Support the creation of co-housing, housing cooperatives, co-living buildings, and other types of housing that provide community-oriented housing alternatives for families, seniors, young singles, religious communities, or other groups with specific needs.	Suggestive	<i>Support</i> is used to set goals and aspirations. There is no directive language to implement the support.	Outcome	The outcome of <i>creation of co-housing, housing cooperatives, co-living buildings, and other types of housing</i> is not linked to a specific supportive action.	General	Who - The city. What - support creation of other types of housing Where - assume wherever new housing is allowed When - Not identified. Why - Not identified. How - Not identified.

Alternative Housing Models						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
University Place						
<p><u>HS2B</u>: Promote increased housing choices, especially for smaller households, to help expand the housing supply to better match the needs of an increasingly diverse population. Effectively administer zoning and development regulations that allow development of housing that satisfies varied consumer preferences, including but not limited to: cottage housing, small lot development, cluster housing, duplexes, triplexes, and fourplexes that are designed to fit within the context of the neighborhood in which the new housing is located. As new and different housing styles become available, give consideration to how they might fit within existing neighborhoods to increase the availability of affordable housing options for moderate-, low-, very low-, and extremely low-income families and increase options for seniors and small households.</p>	Suggestive	<p><i>Promote</i> is used to set goals and aspirations, and is supported by directive action whereby the city will promote housing choices by <i>effectively administer[ing] zoning</i> language to indicate how promotion will occur.</p>	Action	<p>The outcome of <i>increased housing choices</i> is achieved by <i>effectively administer[ing] zoning and development regulations</i>.</p>	Detailed	<p>Who - The city. What - promote increased housing choices Where - within the city where housing is zoned for When - Not identified. Why - to expand the housing supply How - Not Identified</p>

Alternative Housing Models						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
University Place (continued from previous page)						
HS4E: Encourage a range of housing types for seniors affordable at a variety of incomes, such as independent living, various degrees of assisted living and skilled nursing care facilities. Strive to increase opportunities for seniors to live in accessible housing.	Suggestive	<i>Encourage</i> is used to set goals and aspirations. There is no directive language to implement the support.	Outcome	The outcomes of a <i>range of housing types for seniors</i> and <i>accessible [senior] housing</i> is not encouraged by a specific action.	Detailed	Who - The city. What - encourage range of housing types for seniors Where - Wherever new housing can occur When - Not identified. Why - increase opportunities for seniors to live in accessible housing How - Not identified.

Affordable Housing Requirements

		Directive v Suggestive		Outcome v Action		Detailed v General	
		Category	Reasoning	Category	Reasoning	Category	Reasoning
Kent							
No policies identified in this category.							
Kirkland (continues on following pages)							
<u>Policy H-1.2:</u> Enhance city-wide affordable housing support, incentives, and inclusionary requirements that effectively provide additional affordable housing units to meet current and future permanent housing needs, while maintaining a balanced housing market that supports the development of market-rate housing.	Suggestive	<i>Enhance</i> is used to set goals and aspirations. There is no directive language to indicate how enhancement will be implemented.	Action	The outcome of <i>provid[ing] additional affordable housing units to meet current and future permanent housing needs</i> is linked to the action of <i>enhanc[ing] city-wide affordable housing support, incentives, and inclusionary requirements</i> .	Detailed	Who - The city. What - Enhance city-wide affordable housing support, incentives, and inclusionary requirements Where - The city. When - Not identified. Why - effectively provide additional affordable housing units to meet current and future permanent housing needs How - maintaining a balanced housing market that supports the development of market-rate housing.	
<u>Policy H-1.11:</u> Increase affordable housing in the city's Urban Growth Centers and neighborhood centers, and in areas where residents have access to employment, services, and transportation choices, with regulatory and programmatic reform effective to support innovation in residential construction.	Directive	<i>Increase</i> is used to mandate action to expand affordable housing in targeted areas.	Action	The outcome of increase[ing] affordable housing... is linked to the action of conducting a <i>regulatory and programmatic reform effective to support innovation in residential construction</i> .	Detailed	Who - The city. What - Increase affordable housing Where - in the city's Urban Growth Centers and neighborhood centers, When - Not identified. Why - to support innovation in residential construction. How - with regulatory and programmatic reform effective	

Affordable Housing Requirements

	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Kirkland (continued from previous page, continues on next page)						
<u>Policy H-1.6</u> : Create a program that allows faith-based, or other non-profit and community-based organizations, to create customized development regulations for their properties in exchange for providing substantial public benefits, including affordable housing. The customized regulations and associated public benefits must be considered by Planning Commission and ultimately approved by the City Council on a property-specific basis. The City must provide comprehensive public notice to surrounding properties of any proposed changes and associated public benefits. Preference should be given to projects with deep levels of housing affordability that provide space for continued operation of the faith-based and other community organizations.	Directive	<i>Create</i> is used to mandate the development of a new program that allows tailored development regulations in specific types of organization ownership of land.	Action	The outcome of getting <i>substantial public benefits, including affordable housing</i> , is linked to the action of <i>create[ing] a program that allows faith-based, or other non-profit and community-based organizations, to create customized development regulations for their properties.</i>	Detailed	Who - The city. What - Create a program allowing community-based organizations to propose customized development regulations for their properties in exchange for providing affordable housing. Where - In faith-based or other non-profit and community-based organizations' land When - Not identified. Why - To incentivize the creation of affordable housing and maintain space for the ongoing operation of community-serving organizations How - The customized regulations and associated public benefits must be considered by Planning Commission and ultimately approved by City Council on a property-specific basis

Affordable Housing Requirements						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Kirkland (continued from previous page)						
<u>Policy H-1.12</u> : Collaborate with developers to create a diverse range of housing affordable to many income segments and provide housing choices for people at all stages of life in the city's Urban Growth Centers, neighborhood centers, and near areas where residents have access to employment, services, and transportation choices.	Directive	<i>Collaborate</i> is used to mandate cooperative action between the City and developers to diversify housing types and affordability levels.	Outcome	The outcome of <i>creat[ing] a diverse range of housing affordable to many income segments and provid[ing] housing choices for people at all stages of life</i> is not linked to a mechanism or action other than <i>collaborat[ing] with developers</i> .	Detailed	Who - The city. What - Collaborate with developers Where - in the city's Urban Growth Centers, neighborhood centers, and near areas where residents have access to employment, services, and transportation choices. When - Not identified. Why - to create a diverse range of housing affordable to many income segments and provide housing choices for people at all stages of life How - Not identified
Lakewood						
<u>HO-3.1</u> : Maintain and develop partnerships to create and manage affordable housing with nonprofit agencies and other organizations.	Directive	<i>Maintain</i> and <i>develop</i> are used to mandate the continuation and expansion of partnerships with nonprofit agencies for affordable housing creation and management.	Outcome	The outcome of <i>creat[ing] and manag[ing] affordable housing</i> is not linked to a mechanism or action other than <i>maintain and develop partnership</i>	Detailed	Who - The city. What - Maintain and develop partnerships Where - The city. When - Not identified. Why - to create and manage affordable housing with nonprofit agencies and other organizations. How - Not identified.

Affordable Housing Requirements

Affordable Housing Requirements						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Lakewood (continued from previous page)						
HO-2.2: Encourage middle-housing options affordable to low- and moderate-income households at 100% of area median income or below.	Suggestive	<i>Encourage</i> is used to set goals and aspirations. There is no directive language to indicate how encouragement will be implemented.	Outcome	The outcome of <i>encourage[ed] middle-housing options affordable to low- and moderate-income households at 100% of area median income or below</i> is not linked to a mechanism of action.	General	Who - The city. What - Encourage middle-housing options affordable to low- and moderate-income households at 100% of area median income or below. Where - The city. When - Not identified. Why - Not identified. How - Not identified.
HO-2.3: Provide technical assistance for redevelopment in key areas, including Lake City, Lakeview, Springbrook, Tillicum, the city's residential target areas (RTAs), and senior overlay districts.	Directive	<i>Provide</i> is used to mandate action for offering technical assistance in targeted redevelopment areas.	Action	The outcome of supporting redevelopment is linked to the action of <i>providing technical assistance in places such as... and senior overlay districts</i> .	General	Who - The city. What - Provide technical assistance for redevelopment Where -in key areas... and senior overlay districts. When - Not identified. Why - Not identified. How - Not identified.
HO-2.4: Establish and maintain relationships and pursue partnerships with local and regional market rate and affordable housing developers.	Directive	<i>Establish</i> and <i>maintain</i> are used to mandate the formation and continuation of relationships with developers to support housing development.	Action	The outcome of increasing affordable and market rate housing opportunities is linked to the action of <i>establish[ing] and maintain[ing] relationships and partnerships with local and regional housing developers</i> .	General	Who - The city. What - Establish and maintain relationships and pursue partnerships with local and regional market rate and affordable housing developers Where - The city. When - Not identified. Why - Not identified. How - Not identified.

Affordable Housing Requirements						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Lynnwood						
HO Policy 4.1: Implement zoning, regulation, and incentive changes near transit oriented development (TOD) sites to guide sustainable and equitable development patterns that incorporate affordable housing and public amenities.	Directive	<i>Implement</i> is used to mandate changes that promote equitable and sustainable development patterns.	Action	The outcome of <i>guid[ing] sustainable and equitable development patterns that incorporate affordable housing</i> is linked to the action of <i>implement[ing] zoning, regulatory, and incentive changes near TOD</i> .	Detailed	Who - The city. What - Implement zoning, regulation, and incentive changes Where - near transit oriented development (TOD) sites When - Not identified. Why - to guide sustainable and equitable development patterns that incorporate affordable housing How - Not identified.
Marysville (continues on next page)						
HS 1.7: Continue to promote and recalibrate existing housing incentives (e.g. Downtown Multifamily Tax Exemption, Residential Density Incentives, etc.) and pursue new ones while giving consideration to inclusionary and incentive zoning to increase housing capacity and affordable housing.	Directive	<i>Continue to promote</i> is used to mandate the ongoing support for existing incentives. <i>Pursue</i> is used to mandate exploration of new tools.	Action	The outcome of <i>increas[ing] housing capacity and affordable housing</i> is linked to the action of <i>promot[ing] and recalibrat[ing] housing incentives</i> .	Detailed	Who - The city. What - Continue to promote and recalibrate existing housing incentives Where - The city. When - Not identified. Why - to increase housing capacity and affordable housing. How - giving consideration to inclusionary and incentive zoning.

Affordable Housing Requirements

	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Marysville (continued from previous page)						
<u>HS 1.8</u> : The City will coordinate and partner with agencies and nonprofits, such as the Housing Authority of Snohomish County, Housing Hope, Habitat for Humanity, and others to maintain and increase the supply of housing for all income levels.	Directive	<i>Coordinate</i> and <i>partner</i> are used to mandate collaborative efforts with agencies and nonprofits to support housing at all income levels.	Outcome	The outcome of <i>maintain[ing]</i> and <i>increase[sing]</i> the supply of housing for all income levels is not linked to a mechanism of action other than <i>coordinate[ing]</i> and <i>partner[ing]</i> with agencies and nonprofits.	Detailed	Who - The city. What - coordinate and partner with agencies and nonprofits Where - The city. When - Not identified. Why - to maintain and increase the supply of housing for all income levels. How - Not identified.
<u>HS 1.11</u> : Encourage the preservation, renovation, and production of housing within the region that is affordable to all populations including for households earning less than 50% of AMI.	Suggestive	<i>Encourage</i> is used to set goals and aspirations. There is no directive language to indicate how encouragement will be implemented.	Action	The outcome of increasing affordable housing for all populations is linked to the action of <i>encourag[ing]</i> the preservation, renovation, and production of affordable housing.	General	Who - The city. What - Encourage the preservation, renovation, and production of housing that is affordable to all populations Where - within the region When - Not identified. Why - Not identified. How - Not identified.
<u>HS 1.13</u> : Provide affordable housing opportunities and evaluate potential density increases close to places of employment and near future high capacity transit.	Directive	<i>Provide</i> is used to mandate action regarding affordable housing opportunities. <i>Evaluate</i> is used to mandate a review of potential density increases.	Action	The outcome of expanding affordable housing opportunities is linked to the action of <i>evaluat[ing]</i> potential density increases close to places of employment and near future high capacity transit.	Detailed	Who - The city. What - Provide affordable housing opportunities Where - close to places of employment and near future high capacity transit. When - Not identified. Why - Not identified. How - evaluate potential density increases

Affordable Housing Requirements

	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Port Orchard (continues on next page)						
<u>Policy HS- 4:</u> Provide opportunities through future land use and zoning districts for an economically diversified housing supply, including extremely low, very low-, low-, moderate-, and upper -income levels, to maximize housing options and serve a broad range of community needs.	Directive	<i>Provide</i> is used to mandate the provision of opportunities in zoning and land use that result in a diverse housing supply across income levels.	Action	The outcome of <i>maximizing housing options</i> is linked to the action of <i>provid[ing] opportunities through future land use and zoning districts for an economically diversified housing supply across all income levels.</i>	General	Who - The city. What - Provide opportunities through future land use and zoning districts Where - Not identified. When - Not identified. Why - to maximize housing options and serve a broad range of community needs How - Not identified.
<u>Policy HS- 8:</u> Allow an increased density bonus for affordable housing located on property owned by a religious organization.	Directive	<i>Allow</i> is used to mandate regulatory permission for increased density bonuses on religious-owned properties that include affordable housing.	Action	The outcome of increasing affordable housing supply is linked to the action of <i>allow[ing] an increased density bonus for affordable housing located on property owned by a religious organization.</i>	General	Who - The city. What - Allow an increased density bonus for affordable housing Where - located on property owned by a religious organization When - Not identified. Why - Not identified. How - Not identified.
<u>Policy HS- 10:</u> Provide incentives and work in partnership with not -for profit and for -profit developers land trusts, and public housing authorities, such as Housing Kitsap, to develop and preserve long- term affordable housing options.	Directive	<i>Provide</i> and <i>work</i> are used to mandate incentives and collaborative action with various housing entities to ensure long-term affordability.	Action	The outcome of <i>developing and preserving long-term affordable housing options</i> is linked to the action of <i>provid[ing] incentives and partnering with not-for-profit and for-profit developers, land trusts, and public housing authorities.</i>	General	Who - The city. What - Provide incentives and work in partnership with not -for profit and for -profit developers land trusts, and public housing authorities. Where - Not identified. When - Not identified. Why - to develop and preserve long- term affordable housing options. How - Not identified.

Affordable Housing Requirements						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Port Orchard (continued from previous page)						
Policy HS- 11: Encourage development of housing that is affordable for workers at all income levels that is located near transit, education and training opportunities and other employment centers.	Suggestive	<i>Encourage</i> is used to set goals and aspirations. There is no directive language to indicate how encouragement will be implemented.	Outcome	The outcome of <i>encourag[ing] development of housing that is affordable for workers at all income levels that is located near transit, education and training opportunities and other employment centers</i> is not linked to a mechanism of action.	General	Who - The city. What - Encourage development of housing that is affordable for workers at all income levels Where - located near transit, education and training opportunities and other employment centers. When - Not identified. Why - Not identified. How - Not identified.
Tacoma						
Policy H-3.8: Require the redevelopment of large parcels with City investment to include deeply affordable rental and/or ownership products.	Directive	<i>Require</i> is used to mandate inclusion of deeply affordable housing in redevelopment projects involving City investment.	Action	The outcome of delivering deeply affordable rental and/or ownership options is linked to the action of requiring such products in the redevelopment of large parcels with City investment.	General	Who - The city. What - Require the redevelopment of large parcels with City investment to include deeply affordable rental and/or ownership products. Where - The city. When - Not identified. Why - Not identified. How - Not identified.
Tukwila						
No policies identified in this category.						

Affordable Housing Requirements						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
University Place						
<u>Policy HS3L</u> : As part of any rezone that increases residential capacity, consider requiring a portion of the housing units within future developments to be affordable to extremely low to moderate income households with the amount of the portion and depth of affordability to be identified through a future study. Complete a study that analyzes different set aside scenarios in potential target areas to evaluate which options would most feasibly support affordable housing and housing supply production targets and other Comprehensive Plan goals and policies. Design such units to have an exterior appearance comparable to that of market rate units. Develop incentives to help achieve a higher percentage of affordable units within new development.	Suggestive	<i>Consider</i> is used to set a conditional mandate based on the results of a future study.	Action	The outcome of increasing the supply of affordable housing is linked to the action of <i>consider[ing] requiring a portion of the housing units within future developments to be affordable to extremely low to moderate income households... as part of any rezone that increases residential capacity</i>	General	Who - The city. What - consider requiring a portion of the housing units within future developments to be affordable to extremely low to moderate income households Where - any rezone that increases residential capacity When - Not identified. Why - Not identified. How - Not identified.

Affordable Housing Incentives/Tax Incentives						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Kent						
H-6.4: Continue to contribute to the SKHHP Housing Capital Fund to support the creation and preservation of affordable housing.	Directive ¹⁵⁷	<i>Continue</i> is used to state something currently happening and is supported with a directive action to <i>contribute to the SKHHP Housing Capital Fund</i>	Action	The outcome of <i>creation and preservation of affordable housing</i> is linked to the action <i>continu[ing] to contribute to the SKHHP Housing Capital Fund</i> .	Detailed	Who - The city. What - Continue to contribute to SKHHP housing capital fund Where - assumed wherever new housing can be built When - Not identified. Why - to support the creation and preservation of affordable housing How - by contributing to the SKHHP housing capital fund
Kirkland						
No policies identified in this category.						

¹⁵⁷ While this policy is labeled directive because of its supporting action, the sentence itself is actually written in the indicative mood.

Affordable Housing Incentives/Tax Incentives						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Lakewood						
<u>HO-C</u> : Periodically review the use of housing incentives such as the Multifamily Tax Exemption (MFTE) program to ensure these programs promote desired residential development in targeted areas and support the sustainability of diverse housing options within the community.	Directive	<i>Periodically review</i> is used to set direct action by the city to review the MFTE programs to ensure it promotes development in desired target areas. However, does not specify what they mean by periodically.	Action	The outcome of <i>promot[ing] desired residential development</i> is linked to the action of <i>periodically review[ing] the use of housing incentives</i> .	Detailed	Who - The city. What - review use of housing incentives such as MFTE Where - Not identified. When - Periodically Why - to ensure housing incentive programs are actually leading to development of housing in target areas to support diverse housing options How - Not Identified
<u>TW 3.2</u> : Update the City's adopted housing incentives program (LMC 18A.90.050) as appropriate to include a variety of options (e.g., density bonuses, fee waivers, reduced zoning requirements, expedited permitting, etc.). Develop marketing efforts to stimulate use of the City's program.	Directive	<i>Update</i> is used to direct action toward updating the city's housing incentives program as needed	Action	The outcome of an improved <i>housing incentives program</i> is linked to the actions <i>update the ... program</i> and <i>develop marketing</i> .	Detailed	Who - The city. What - update the cities housing incentive programs Where - Tillicum and Woodbrook area When - as needed Why - to stimulate use of the city's housing incentives program How - developing marketing efforts

Affordable Housing Incentives/Tax Incentives						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Lynnwood						
<u>HO 2.9</u> : Incentivize and promote the development and preservation of long-term affordable housing by using height and density bonuses, property tax incentives, and parking requirement reductions.	Directive	<i>Incentivize</i> is used to direct action for the city to implement tax incentives	Action	The outcome of <i>develop[ing] and preserv[ing] long-term affordable housing</i> is linked to the action of <i>using height and density bonuses, property tax incentives, and parking requirement reductions</i> .	Detailed	Who - The city. What - incentivize and promote the development and preservation of long-term affordable housing Where - assume wherever new housing is allowed When - Not identified. Why - to preserve long-term affordable housing How - through height and density bonuses, property tax incentives, and parking requirement reductions
Marysville						
<u>HAP 1.3</u> : Expand and Calibrate Existing MFTE Program to Stimulate Program Participation Expand the eligible areas; -Reduce the unit threshold from 10 to 4; -Reach out to local and regional developers to enhance awareness of the program; and -Conduct a market assessment of the existing and potential MFTE areas.	Directive	<i>Expand</i> is used to direct action for the city to expanding existing tax incentive programs	Action	The outcome of improving the <i>existing MFTE program to stimulate program participation</i> is linked to the actions <i>expand the eligible areas; reduce the unit threshold...; reach out to ... developers...; and conduct a market assessment</i> .	Detailed	Who - The city. What - expand and calibrate existing MFTE program Where - assume wherever new housing is allowed When - Not identified. Why - to stimulate program participation How - through reducing the unit threshold from 10-4, reach out to local and regional developers, and conduct a market assessment

Affordable Housing Incentives/Tax Incentives						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Port Orchard						
<p><u>HS- 17</u>: Explore the re-establishment of a Multifamily Tax Exemption (MFTE) program as a means of increasing the City' s affordable housing supply. Consider the recommendations of the Port Orchard Housing Action Plan on eligible zones and properties, qualifying income levels, program duration, development incentives, and other standards.</p>	Suggestive	<p><i>Explore</i> is used to set goals and aspirations. There is no directive language to implement the support.</p>	Outcome	<p>The outcome of <i>explore the re-establishment of a MFTE program</i> and <i>consider the recommendations of the Port Orchard Housing Action Plan</i> is not linked to specific action, such as evaluation criteria or commitment to implementation.</p>	Detailed	<p>Who - The city. What - explore re-establishing MFTE program Where - assumed wherever new housing can be built When - Not identified. Why - to increase city's affordable housing supply How - by considering recommendations from the Port Orchard Housing Action Plan on eligible zones and properties</p>

Affordable Housing Incentives/Tax Incentives						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Tacoma						
<u>H-1.6</u> : Implement equitable land use incentives such as density or development bonuses, lot size reductions, transfer of development rights, height or bulk bonuses, fee waivers, accelerated permitting, parking requirement reductions, tax incentives, and “surplus land sales” to remove housing development barriers for income-restricted affordable housing and other housing types serving costburdened communities.	Directive	<i>Implement</i> is used to direct action for the city to implement equitable land incentives	Action	The outcome of <i>remove housing development barriers</i> is linked to the action <i>[implement] equitable land use incentives</i> .	Detailed	Who - The city. What - implement equitable land use incentives Where - where new housing is possible When - Not identified. Why - to remove housing development barriers for income-restricted affordable housing How - by implementing equitable land use incentives such as those described
<u>H-1.7</u> : Review and update affordable housing incentives and requirements, such as those listed in H-1.6, to improve their efficacy and impact.	Directive	<i>Review</i> is used to direct action for the city to review and update affordable housing incentives	Action	The outcome of <i>improve[d] efficacy and impact</i> is linked to the action <i>review and update affordable housing incentives and requirements</i> .	Detailed	Who - The city. What - update the affordable housing incentives listed in H-1.6 Where - where new housing can be built When - Not identified. Why - to improve efficacy and impact of affordable housing incentives How - by reviewing and updating the the incentives and requirements

Affordable Housing Incentives/Tax Incentives						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Tukwila						
<u>H3.2</u> : Pursue establishing, or expanding, programs to provide tax incentives for increased housing development.	Suggestive	<i>Pursue</i> is used to set goals and aspirations. There is no directive language to implement the support.	Outcome	The outcome of <i>establishing, or expanding, programs to provide tax incentives</i> is not linked to a specific action or criteria for pursuing it.	Detailed	Who - The city. What - pursue establishing or expanding programs for tax incentives Where - Where new housing is possible When - Not identified. Why - to increase housing development How - Not identified.
University Place (continues on next page)						
<u>HS31</u> : Provide incentives to developers who choose to develop affordable housing for extremely low to moderate-income households. Evaluate updates to the existing Multifamily Tax Exemption (MFTE) program to test out program changes and their associated costs and benefits helping to support overall housing production and affordable housing targets. This evaluation should consider the 12-year tax exemption option, expansions to the residential target areas, and other new program features.	Directive	<i>Provide</i> and <i>evaluate</i> are used to direct action for the city to provide tax incentives and evaluate the cost and benefits of these programs in supporting overall housing production.	Action	The outcome of <i>supporting overall housing production and affordable housing targets</i> is linked to the action <i>provide incentives to developers</i> .	Detailed	Who - The city. What - provide housing incentives and evaluate program effectiveness Where - where new housing can be built When - Not identified. Why -to ensure city meets overall housing production targets How - through providing the tax incentives and evaluating the effectiveness of the incentive programs

Affordable Housing Incentives/Tax Incentives						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
University Place (continued from previous page)						
HS3J: Encourage property owners, housing developers and buildings to take advantage of the opportunities and incentives provided by the City's small lot development standards	Suggestive	<i>Encourage</i> is used to set goals and aspirations. There is no directive language to implement the support.	Outcome	The outcome of <i>property owners, housing developers, and buildings [taking] advantage of ... the City's small lot development standards</i> is not linked to a specific action to encourage the behavior.	General	Who - The city. What - encourage target population to take advantage of incentive programs Where - Where new housing is possible When - Not identified. Why - Not identified. How - Not identified.

Mixed-Income Housing						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Kent						
<p>SPO2-12: Remove barriers to regulated affordable housing that fills needed gaps.</p> <ul style="list-style-type: none"> - Encourage dispersion of affordable homeownership projects, such as Habitat for Humanity or similar models, in all residential zones in order to avoid concentrations and equitably serve communities - Incentivize construction of rentals affordable to those making less than 30% Area Median Income in mixed income communities within Downtown and Midway through the Targeted Residential Investment Program or other means. - Consider creating a fee collection/ reimbursement system where new market-rate development contributes additional fees that are pooled to offset permitting fees for affordable housing projects. - Monitor trends in supportive housing and regulate as needed, working with supportive housing providers to collaboratively determine appropriate siting/spacing, address permitting issues, and ensure successful operations. 	Suggestive	<p><i>Remove and incentivize</i> are used to direct action, and include specific implementation steps, but the majority of the accountability verbs in this policy use Suggestive language -- <i>Encourage</i> is used to set goals and aspirations, while <i>consider</i> and <i>monitor</i> are used to express exploration and consideration.</p>	Action	<p>The outcome of <i>remove barriers to ... affordable housing</i> is achieved by the action of <i>incentivize construction ... through the Targeted Residential Investment Program</i>. It is also supported by <i>[encouraging dispersement] of affordable homeownership projects, [considering creation] of a fee collection/reimbursement system, and [monitoring] trends.</i></p>	Detailed	<p>Who - The city. What - Remove barriers to regulated affordable housing. Where - In all residential zones, or in Downtown and Midway. When - When these various things take place, barriers to regulated affordable housing will be removed. Why - To fill gaps in affordable housing. How - By encouraging dispersion of projects such as Habitat for Humanity in all residential zones; incentivizing construction through the Targeted Residential Investment Program; and regulating supportive housing as needed.</p>

Mixed-Income Housing						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Kirkland						
<u>H-2.14</u> : Develop healthy communities by supporting flexible development regulations, programs and development partnerships that open up opportunities to allow for housing and services for intergenerational communities, and affordable and mixed-income housing.	Suggestive	While development is sometimes directive, this policy uses <i>support</i> to set goals and aspirations.	Action	The outcome of <i>[developing] healthy communities</i> is achieved by <i>supporting flexible development regulations, programs and development partnerships</i> .	Detailed	Who - The city. What - Develop healthy communities. Where - The city. When - When flexible development regulations, programs and development partnerships are supported, healthy communities will be developed. Why - To allow for housing and services for intergenerational communities, and affordable and mixed-income housing. How - Not identified.
Lakewood						
<u>HO-2.2</u> : Encourage middle-housing options affordable to low- and moderate-income households at 100% of area median income or below.	Suggestive	<i>Encourage</i> is used to set goals and aspirations, but no specific forms of encouragement are indicated.	Outcome	The outcome of <i>affordable middle-housing options</i> is achieved by <i>encouragement</i> , though the details of that encouragement are not specified.	Detailed	Who - The city. What - Encourage middle-housing options affordable to low- and moderate-income households. Where - Where new housing can be built. When - Not identified. Why - To encourage middle-housing options. How - Not identified.

Mixed-Income Housing						
Directive v Suggestive			Outcome v Action		Detailed v General	
Category	Reasoning		Category	Reasoning	Category	Reasoning
Lynnwood						
No policies identified in this category.						
Marysville						
No policies identified in this category.						
Port Orchard						
HS- 19: Encourage the development of both vertical and horizontal forms of mixed-use developments featuring a combination of multifamily housing and nonresidential uses within centers.	Suggestive	<i>Encourage</i> is used to set goals and aspirations, but no specific forms of encouragement are indicated.	Action	The desired outcome of <i>vertical and horizontal forms of mixed-use developments</i> is not identified.	General	Who - The city. What - Encourage the development of ... mixed-use developments. Where - Within centers, which are not specifically identified here. When - Not identified. Why - Not identified. How - Not identified.
Tacoma						
H-3.6: Promote multifamily housing units with 2- or more bedrooms, particularly in areas where they are in short supply.	Directive	<i>Promote</i> is used to direct action, although the specific ways in which promotion will occur is not specified.	Action	The outcome of <i>[promoting] multifamily housing units</i> is not identified.	General	Who - The city. What - Promote multifamily housing units. Where - In areas where they are in short supply. When - Not identified. Why - Not identified. How - Not identified.

Mixed-Income Housing						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Tacoma (continued from previous page)						
<u>H-5.4</u> : Encourage income diversity across the city by allowing a mix of housing types and tenures in all neighborhoods.	Directive	<i>Encourage</i> is used to set goals and aspirations, but supported by the directive action of allowing a mix of housing types and tenures in all neighborhoods.	Action	The outcome of <i>income diversity across the city</i> is achieved by <i>allowing a mix of housing types and tenures in all neighborhoods</i> .	Detailed	Who - The city. What - Encourage income diversity. Where - In all neighborhoods. When - When a mix of housing types and tenures are allowed in all neighborhoods, income diversity will be encouraged. Why - To encourage income diversity across the city. How - By allowing a mix of housing types and tenures in all neighborhoods.
Tukwila						
<u>H2.1</u> : Encourage production in all neighborhoods of diverse housing types that are appropriate for residents in all stages of life and all household sizes.	Suggestive	<i>Encourage</i> is used to set goals and aspirations. There is no directive language to indicate how encouragement will be implemented.	Outcome	The outcome of <i>production ... of diverse housing types</i> is not linked to a specific action.	Detailed	Who - The city. What - Encourage production .. of diverse housing types. Where - In all neighborhoods. When - Not identified. Why - To ensure a supply of [housing] that [is] appropriate for [all residents] How - Not identified.

Mixed-Income Housing						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Tukwila (continued from previous page)						
H2.2: Encourage housing development affordable to all income segments sufficient to meet needs consistent with adopted targets.	Suggestive	<i>Encourage</i> is used to set goals and aspirations. There is no directive language to indicate how encouragement will be implemented.	Outcome	The outcome of <i>housing development affordable to all income segments</i> is not linked to a specific action.	Detailed	Who - The city. What - <i>Encourage housing development affordable to all income segments.</i> Where - Where new housing can be developed. When - Not identified. Why - <i>To ensure a supply of housing affordable to all income segments and sufficient to meet [targets]</i> How - Not identified.
H2.3: Encourage the creation of housing for different income levels in residential areas throughout the City.	Suggestive	<i>Encourage</i> is used to set goals and aspirations. There is no directive language to indicate how encouragement will be implemented.	Outcome	The outcome of <i>creation of housing for different income levels</i> is not linked to a specific action.	Detailed	Who - The city. What - <i>Encourage the creation of housing for different income levels.</i> Where - <i>In residential areas.</i> When - Not identified. Why - <i>To ensure a supply of housing for different income levels.</i> How - Not identified.

Mixed-Income Housing						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Tukwila (continued from previous page)						
H5.2: Review and update development code to support production of housing types that provide relatively affordable homeownership options, such as middle housing (including townhouses) and condominiums.	Directive	<i>Review and update</i> are used to direct action.	Action	The outcome of <i>production of ... relatively affordable homeownership options</i> is supported by the action <i>review and update development code</i> .	Detailed	Who - The city. What - Review and update development code to support production of housing types that provide relatively affordable homeownership options. Where - Where new housing can be built. When - When the development code is reviewed and updated Why - To ensure the development code supports relatively affordable home ownership options. How - By reviewing and updating the development code.
University Place						
No policies identified in this category.						

Accessory Dwelling Units (ADUs)						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Kent						
<u>Policy H-2.6</u> : Continue to allow and promote the development of attached and detached ADUs as long-term rentals, entry-level homeownership opportunities, and multi-generational living solutions.	Suggestive	<i>Continue</i> is suggestive language. <i>Promote</i> is used to direct action, although the specific ways in which promotion will occur is not specified. Therefore the policy is suggestive overall.	Outcome	No action-oriented language present.	General	Who - The city. What - Promote the development of attached and detached ADUs. Where - The city. When - Not identified. Why - Not identified. How - Not identified.
Kirkland						
<u>Policy H-1.7</u> : Support a variety of regulatory and programmatic solutions to incentivize ADU and DADU long-term rental units.	Suggestive	<i>Support</i> is suggestive language.	Action	<i>Incentivize</i> is action-oriented language.	Detailed	Who - The city. What - Incentivize ADU and DADU rental units. Where - The city. When - Not identified. Why - Not identified. How - Supporting regulatory and programmatic solutions.
<u>Policy H-1.8</u> : Continue to support the construction of ADUs, DADUs, cottages, duplexes, triplexes, and other forms of missing middle housing and ensure zoning and regulations do not add to the cost of building housing.	Suggestive	<i>Support</i> is suggestive language.	Outcome	No action-oriented language present.	Detailed	Who - The city. What - Construction of ADUs. Where - The city. When - Not identified. Why - Not identified. How - Support.

Accessory Dwelling Units (ADUs)						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Lakewood						
HO-4.4: Support ADUs to provide affordable housing options and alternatives for aging-in-place.	Suggestive	<i>Support</i> is suggestive language.	Outcome	No action-oriented language present.	Detailed	Who - The city. What - Support ADUs. Where - The city. When - Not identified. Why - To provide affordable housing options. How - Not identified.
HO-5.10: Encourage ADUs as an option for supportive living and aging-in-place.	Suggestive	<i>Encourage</i> is suggestive language.	Outcome	No action-oriented language present.	Detailed	Who - The city. What - ADUs as an option for supportive living and aging-in-place. Where - The city. When - Not identified. Why - Not identified. How - Encourage.
HO-G: Provide support such as preapproved plans to encourage the development of Accessory Dwelling Units (ADUs).	Directive	Providing preapproved plans is directive language.	Action	Providing preapproved plans is to encourage the development of ADUs is action-oriented language.	Detailed	Who - The city. What - Development of ADUs. Where - The city. When - Not identified. Why - Not identified. How - Providing support.

Accessory Dwelling Units (ADUs)						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Lynnwood						
No policies identified in this category.						

Accessory Dwelling Units (ADUs)						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Marysville (continues on next page)						
HAP Action 1.6: Accessory Dwelling Unit Code Amendments and Incentives Accessory dwelling units (ADUs) are an affordable way to contribute to the housing supply while providing options for renters and smaller households. The State of Washington, through House Bill (HB) 1337, requires cities to allow at least two ADUs on all lots within an Urban Growth Area that allow for single family homes. Off-street parking reductions, lower impact fees, increased structure height, and elimination of the owner occupancy condition are also required. The City anticipates adopting these regulations within six months of the Comprehensive Plan update deadline. Incentives such as providing pre-approved house plans may also be considered in order to eliminate the cost of hiring an architect and to streamline permitting.	Suggestive	<i>Anticipates</i> and <i>may</i> are suggestive language.	Outcome	No action-oriented language present.	Detailed	Who - The city. What - Contribute to the housing supply. Where - Urban Growth Areas that allow for single family homes. When - Within six months of the Comprehensive Plan update. Why - Required. How - Adopting regulations.

Accessory Dwelling Units (ADUs)						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Marysville (continued from previous page)						
HS 1.5: Provide for a wide range of housing choices in residential and commercial zones, including, but not limited to single family residences, Planned Residential Developments, apartments, and moderate density or middle housing types such as cottages, townhouses (e.g. triplexes, fourplexes), and accessory dwelling units.	Directive	<i>Provide</i> is directive language.	Outcome	No action-oriented language present.	General	Who - The city. What - Provide a wide range of housing choices. Where - In residential and commercial zones. When - Not identified. Why - Not identified. How - Not identified.
Port Orchard						
Policy HS- 12: Promote development of attached and detached ADUs in all residential to provide additional housing choices for all economic income levels, multi -generational households, and smaller households in residential neighborhoods.	Suggestive	<i>Promote</i> is suggestive language.	Action	<i>Development and provide</i> are action-oriented language.	Detailed	Who - The city. What - Development of ADUs. Where - Residential neighborhoods. When - Not identified. Why - To provide housing choices. How - Promoting.

Accessory Dwelling Units (ADUs)						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Tacoma						
Policy H-1.2: Encourage new and innovative housing types that meet the evolving needs of Tacoma households and expand housing choices in all neighborhoods. These housing types include multi-dwelling units, from duplexes to high-rise developments, small units, accessory dwelling units, prefabricated homes, such as manufactured and modular, co-housing, and clustered housing.	Suggestive	<i>Encourage</i> is suggestive language.	Outcome	No action-oriented language present.	Detailed	Who - The city. What - New housing types. Where - All neighborhoods. When - Not identified. Why - To meet the needs of Tacoma households. How - Encouraging.
Policy H-3.7: Working with local architects and lenders, create a set of affordable ADU designs and a financing package to facilitate the construction of, or subdivision to, ADUs by moderate- and low-income households.	Directive	<i>Working</i> is directive language.	Action	Creating a set of affordable ADU designs is action-oriented language.	Detailed	Who - The city. What - Facilitate the construction of ADUs. Where - The city. When - Not identified. Why - Not identified. How - Working with local partners to create a set of designs and financing packages.
Tukwila						
H5.1: Encourage development of housing that is appropriate for multi-generational families, including the development of accessory dwelling units (ADUs), middle housing, and family-sized apartments.	Suggestive	<i>Encourage</i> is suggestive language.	Outcome	No action-oriented language present.	Detailed	Who - The city. What - Development of housing. Where - The city. When - Not identified. Why - Not identified. How - Encourage.

Accessory Dwelling Units (ADUs)						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
University Place						
Policy HS2G: Implement design standards for detached ADUs to be architecturally compatible with the principal residence and ensure that modifications to the exterior of an existing home to accommodate an attached ADU are architecturally consistent with the existing design. In addition, the city should evaluate changes to the existing ADU development regulations and standards to comply with state law (such as HB 1337 requiring that cities allow up to two ADUs on all lots zoned to allow single-family homes) and consider other changes to encourage ADU development (such as removing owner occupancy standards, increasing the maximum size of the ADU, and other measures highlighted in the HAP, 2021). Allow attached and detached accessory dwelling units in conjunction with single family and duplex dwellings. Implement design standards for detached accessory dwelling units to address privacy between the unit and neighboring properties or open space areas. Support the ability for detached accessory dwelling units to be sold individually.	Directive	Implementing design standards is directive language.	Action	Implementing design standards, evaluating changes, and allowing ADUs are action-oriented language.	Detailed	Who - The city. What - Supporting ADUs. Where -Single-family zoned neighborhoods. When - Not identified. Why - To comply with state law. How - Implementing design standards and allowing ADUs in the city.

Naturally Occurring Affordable Housing						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Kent						
H-3.4: Support the preservation of multi-family units, government- subsidized housing, naturally occurring affordable housing, and other sources of affordable housing, while implementing anti-displacement measures to ensure housing stability for all community members.	Suggestive	Support is used to suggest assistance and promote options without mandating a specific action.	Outcome	The outcome of <i>ensuring housing stability for all community members</i> is linked to the action of <i>supporting the preservation of affordable housing and implementing anti-displacement measures</i> , although those are not described.	Detailed	Who - The city. What - Support the preservation of multi-family units, government-subsidized housing, naturally occurring affordable housing, and other sources of affordable housing Where - The city. When - Not identified. Why - to ensure housing stability for all community members. How - Not identified.
Kirkland						
H-2.15: Develop and continue programs that support the retention of affordable housing by helping residents and property owners maintain and retrofit homes to make them more energy-efficient and weather-proof, and by adopting regulations that make it easier for existing property owners to undertake home improvements.	Suggestive	Support is used to suggest assistance and promote options without mandating a specific action.	Action	The outcome of <i>retaining affordable housing</i> is linked to the actions of developing programs for retrofitting homes and adopting regulations to make home improvements easier for property owners.	Detailed	Who - The city. What - support the retention of affordable housing. Where - The city. When - Not identified. Why - Not identified. How - helping residents and property owners maintain and retrofit homes to make them more energy-efficient and weather-proof, and by adopting regulations that make it easier for existing property owners to undertake home improvements.

Naturally Occurring Affordable Housing

Directive v Suggestive		Outcome v Action		Detailed v General		
Category	Reasoning	Category	Reasoning	Category	Reasoning	
Lakewood (continues on following pages)						
HO-3: Encourage the preservation and expansion of housing options for lower-income.	Suggestive	<i>Encourage</i> is used to set goals and aspirations. There is no directive language to indicate how encouragement will be implemented.	Outcome	The outcome of <i>preserving and expanding housing options for lower-income households</i> is not linked to specific actions.	General	Who - The city. What - Encourage the preservation and expansion of housing options for lower-income. Where - The city. When - Not identified. Why - Not identified. How - Not identified.
HO-3.1: Maintain and develop partnerships to create and manage affordable housing with nonprofit agencies and other organizations.	Directive	<i>Maintain</i> and <i>develop</i> are used to mandate the continuation and development of partnerships.	Outcome	The outcome of creating and <i>managing affordable housing</i> is not linked to specific actions, other than <i>maintaining and developing partnerships with nonprofit agencies and other organizations</i> .	Detailed	Who - The city. What - Maintain and develop partnerships to create and manage affordable housing Where - The city. When - Not identified. Why - Not identified. How - by developing partnerships with nonprofit agencies and other organizations.
HO-3.5: Where possible, support the preservation and improvement of existing subsidized housing and affordable market-rate housing.	Suggestive	<i>Support</i> is used to suggest assistance and promote options without mandating a specific action.	Outcome	The outcome of <i>preserv[ing] and improv[ing] exist[ing] subsidized housing and affordable market-rate housing</i> is not linked to specific actions.	General	Who - The city. What - support the preservation and improvement of existing subsidized housing and affordable market-rate housing. Where - The city. When - Not identified. Why -Not identified. How - Not identified.

Naturally Occurring Affordable Housing						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Lakewood (continues on next page, continued from previous page)						
HO-3.6: Maintain a need-based program for housing rehabilitation grants to lower-income homeowners at 80% of AMI or below.	Directive	<i>Maintain</i> is used to mandate the continuation of housing rehabilitation grants.	Action	The outcome of rehabilitating housing for lower-income homeowners is linked to the action of <i>maintaining a need-based program for housing rehabilitation grants</i> .	Detailed	Who - The city. What - Maintaining a housing rehabilitation grant program. Where - Houses whose owners' income level is at 80% of AMI or below. When - The use of "maintain" implies the program is ongoing and currently in place. Why - Not identified. How - Not identified.
HO-3.7: Maintain need-based housing rehabilitation and repair programs for rental housing meeting the needs of lower-income households at 80% of AMI or below.	Directive	<i>Maintain</i> is used to mandate the continuation of housing rehabilitation and repair programs.	Action	The outcome of rehabilitating rental housing for lower-income households is linked to the action of maintaining need-based housing rehabilitation and repair programs.	Detailed	Who - The city. What - Maintaining a housing rehabilitation grant program. Where - Houses which renters' income level is at 80% of AMI or below. When - The use of "maintain" implies the program is ongoing and currently in place. Why - Not identified. How - Not identified.

Naturally Occurring Affordable Housing						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Lakewood (continued from previous page)						
HO-3.8: Encourage revitalization and rehabilitation of existing apartment complexes in the city to maintain affordable and family-sized housing options.	Suggestive	<i>Encourage</i> is used to set goals and aspirations. There is no directive language to indicate how encouragement will be implemented.	Outcome	The outcome of <i>maintaining affordable and family-sized housing options</i> is linked to the action of <i>encourag[ing] revitalization and rehabilitation of existing apartment complexes</i> , although no concrete actions are described.	Detailed	Who - The city. What - Encourage revitalization and rehabilitation of existing apartment complexes in the city Where - The city. When - Not identified. Why - to maintain affordable and family-sized housing options. How - Not identified.
HO-3.9: Preserve and maintain existing manufactured housing parks as a supply of affordable housing, and encourage long-term housing solutions that will maintain affordable options for residents.	Directive	Primarily directive with considerative elements. The first clause (<i>Preserve and maintain...</i>) is directive. The second clause (<i>encourage long-term housing solutions...</i>) is suggestive.	Outcome	The outcome of <i>maintaining affordable housing options in manufactured housing parks</i> is linked to the action of <i>preserv[ing] and maintaining existing manufactured housing parks and encouraging long-term housing solutions</i> , although no concrete actions are described.	Detailed	Who - The city. What - Preserve and maintain existing manufactured housing parks as a supply of affordable housing Where - The city. When - Not identified. Why - maintain affordable options for residents. How - Not identified.

Naturally Occurring Affordable Housing						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Lynnwood						
<u>HO 2.3</u> : Protect existing naturally affordable housing, including mobile home and manufactured home parks	Directive	Protect is used to direct action even though it does not specify how it will protect naturally affordable housing	Outcome	The outcome of <i>protect[ing] existing naturally affordable housing</i> is not linked to a specific action.	General	Who - The city. What - <i>Protect naturally affordable housing, including mobile home and manufactured home parks</i> Where - The city. When - Not identified. Why - Not identified. How - Not identified.
<u>HO 2.5</u> : Establish a system to monitor the retention of existing affordable housing as redevelopment occurs and strive to have no net loss of affordable housing.	Directive	Establish is used to mandate the creation of a system, while strive expresses an aspirational goal	Action	The outcome of <i>avoiding net loss of affordable housing</i> is linked to the action of <i>establish[ing] a monitoring system</i> .	General	Who - The city. What - Establish a system to monitor the retention of existing affordable housing ...and strive to have no net loss of affordable housing. Where - The city. When - Not identified. Why - Not identified. How - Not identified.

Naturally Occurring Affordable Housing						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Marysville						
<p><u>HAP 2.2</u>: Support the Preservation of Manufactured Home Parks.</p> <p>The City can assist housing authorities, non-profits, and resident-owned communities with guidance on acquiring a mobile home park.</p> <p>A Tenant Opportunity to Purchase ordinance can be pursued which would require property owners to inform residents of the intent to sell the MHP and provide a timeframe within which residents can organize and offer to purchase the property.</p> <p>A Resident-Owned Community (ROC) is an operational structure that functions as a co-op, where a board handles day-to-day issues (instead of a property manager) and households pay rent each month to cover taxes, insurance, trash collection, the ROC's mortgage payments, and co-op membership payment.</p>	Suggestive	Support is used to suggest assistance and promote options without mandating a specific action	Action	The outcome of <i>preserving manufactured home parks</i> is linked to the actions of assisting acquisitions, enabling resident ownership, and pursuing a Tenant Opportunity to Purchase ordinance.	Detailed	<p>Who - The city.</p> <p>What - Support the Preservation of Manufactured Home Parks.</p> <p>Where - The city.</p> <p>When - Not identified.</p> <p>Why - Not identified.</p> <p>How - The City can assist housing authorities, non-profits, and resident-owned communities with guidance on acquiring a mobile home park.</p>

Naturally Occurring Affordable Housing						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Port Orchard						
HS- 27: Consider programs and other maintenance support, such as use of Community Development Block Grants or Housing Repair Programs to preserve or rehabilitate neighborhoods and areas that are showing signs of deterioration due to lack of maintenance or abandonment.	Suggestive	<i>Support</i> is used to suggest assistance and promote options without mandating a specific action.	Action	The outcome of preserving or rehabilitating deteriorating neighborhoods is linked to the action of considering programs and maintenance support, such as Community Development Block Grants or Housing Repair Programs.	Detailed	Who - The city. What - Consider programs and other maintenance support, ... to preserve or rehabilitate neighborhoods Where - Neighborhoods and areas that are showing signs of deterioration When - Not identified. Why - Not identified. How - use of Community Development Block Grants or Housing Repair Programs
Tacoma (continues on next page)						
H-1.3: Support the maintenance and improvement of the existing housing stock, and encourage the adaptation of the existing housing stock to accommodate a variety of needs.	Suggestive	<i>SSupport</i> is used to set goals and aspirations. There is no directive language to implement the support.	Action	The outcome of improving and adapting the housing stock is linked to the actions of supporting maintenance, improvement, and adaptation efforts to accommodate diverse needs.	Detailed	Who - The city. What - <i>Support the maintenance and improvement of the existing housing stock, and encourage the adaptation of the existing housing stock</i> Where - The city. When - Not identified. Why - <i>To accommodate a variety of needs.</i> How - Not identified.

Naturally Occurring Affordable Housing

		Directive v Suggestive		Outcome v Action		Detailed v General	
		Category	Reasoning	Category	Reasoning	Category	Reasoning
Tacoma (continued from previous page)							
H-6.7: Promote the maintenance, repair, rehabilitation, and adaptive reuse of the city's existing housing stock. Pursue financial incentives and funding for housing improvement programs, subdivision, and adaptive reuse, especially for low income households. Integrate regulatory tools that incentivize reuse and conversion of existing viable structures into housing to meet community needs.	Directive	Promote and pursue are used to suggest support and encouragement emphasizing enabling actions rather than mandating them.	Action	The outcome of meet[ing] community [housing] needs is linked to the action of promoting maintenance and reuse, pursuing financial incentives, and integrating regulatory tools to incentivize adaptive reuse and conversion.	Detailed	Who - The city. What - Promote housing stock maintenance, rehabilitation, and adaptive reuse of the existing housing stock. Where - The policy applies to the city's existing housing stock. When - Not identified. Why - Not identified. How - Through financial incentives, funding programs, subdivision, adaptive reuse, and the use of regulatory tools.	
Tukwila (continues on next page)							
H4.3: Evaluate City actions for potential to increase displacement risk for naturally occurring affordable housing and vulnerable communities and mitigate or avoid taking actions that significantly increase this risk.	Directive	Evaluate and mitigate are used to mandate specific actions.	Action	The outcome of reducing displacement risk is linked to the actions of evaluat[ing] City actions and mitigat[ing] or avoid[ing] taking actions that significantly increase [displacement] risk.	Detailed	Who - The city. What - Evaluate City actions for potential to increase displacement risk ... and mitigate or avoid taking actions that significantly increase this risk. Where - The city. When - Not identified. Why - To reduce displacement risk for naturally occurring affordable housing How - Mitigating or avoiding actions that increase this risk.	

Naturally Occurring Affordable Housing						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Tukwila (continued from previous page)						
<u>H4.4</u> : Support the long-term preservation of existing naturally occurring affordable housing developments by acting as a facilitator between affordable housing groups interested in purchasing units and property owners.	Suggestive	Support is used to suggest assistance and promote options without mandating a specific action.	Action	The outcome of preserving naturally occurring affordable housing is linked to the action of facilitating connections between affordable housing groups and property owners.	Detailed	Who - The city. What - Support the long-term preservation of naturally occurring affordable housing. Where - The city. When - Not identified. Why - Not identified. How - by acting as a facilitator between affordable housing groups interested in purchasing units and property owners.
<u>H2.7</u> : Work with the owners and managers of Tukwila's new and existing permanent or long-term low-income housing to maximize housing desirability, protect long term affordability, and strengthen community connections.	Directive	Work with is used to direct collaboration and action aimed at achieving specific outcomes.	Outcome	The outcome of <i>maximizing housing desirability, protecting long-term affordability, and strengthening community connections</i> is not linked to specific actions, other than working with owners and managers of low-income housing.	General	Who - The city. What - maximize housing desirability, protect long term affordability, and strengthen community connections. Where - Tukwila's new and existing permanent or long-term low-income housing When - Not identified. Why - Not identified. How - Not identified.

Naturally Occurring Affordable Housing

		Directive v Suggestive		Outcome v Action		Detailed v General	
		Category	Reasoning	Category	Reasoning	Category	Reasoning
Tukwila (continued from previous page)							
H4.6: Continue to support the maintenance, weatherization, rehabilitation, and long term preservation or replacement of existing housing for low- and moderate income residents.	Suggestive	Support is used to suggest assistance and promote options without mandating a specific action.	Action	The outcome of <i>preserv[ing] or replac[ing] existing housing for low- and moderate-income residents</i> is linked to the action of <i>support[ing] maintenance, weatherization, rehabilitation, and long-term preservation or replacement efforts.</i>	General	Who - The city. What - Continue to support the maintenance, weatherization, rehabilitation, and long term preservation or replacement... Where - The city. When - Not identified. Why - Not identified. How - Not identified.	
University Place							
HS1B: Encourage repair and maintenance of the City's existing housing stock to provide cost-effective, affordable home options. Promote, support, and work directly with volunteer programs that offer home repair and maintenance assistance for extremely low- to low-income homeowners, elderly homeowners, and homeowners with a disability. (pg. 4-8)	Suggestive	Mixed. Primarily Suggestive, since most verbs like encourage are used to set goals or promote actions.	Action	The outcome of <i>providing cost-effective, affordable home options</i> is linked to the action of <i>encourag[ing] repair and maintenance of the City's existing housing stock and promoting, support[ing], and work[ing] with volunteer programs that offer home repair and maintenance assistance for low-income, elderly, and disabled homeowners.</i>	Detailed	Who - The city. What - Encourage repair and maintenance of the City's existing housing stock Where - The city When - Not identified. Why - to provide cost-effective, affordable home options. How - Promote, support, and work directly with volunteer programs that offer home repair and maintenance assistance for extremely low- to low-income homeowners	

Naturally Occurring Affordable Housing						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
University Place (continued from previous page)						
HS2F: Encourage the preservation of the existing stock of mobile home parks as a viable source of affordable and permanent supportive housing.	Suggestive	Encourage is used to set goals and aspirations. There is no directive language to indicate how encouragement will be implemented.	Action	The outcome of <i>preserving viable sources of affordable and permanent supportive housing</i> is linked to the action of <i>preservi[ng] of the existing stock of mobile home parks</i> .	Detailed	Who - The city. What - Encourage the preservation of the existing stock of mobile home parks Where - The city. When - Not identified. Why - as a viable source of affordable and permanent supportive housing. How - Not identified.

Manufactured/Mobile Home Park Policy						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Kent						
<u>SPO1-4</u> : Improve conditions at mobile home parks such that they can remain a healthy and safe place to live, through the creation and distribution of educational materials about regulatory responsibilities for addressing issues, a compassionate code enforcement strategy focused on risk reduction rather than rote compliance, code changes to allow park upgrades regardless of overall compliance, and possibly a home replacement program. Work first to identify improvements park owners can take, as opposed to homeowners within parks, and consider ways to incentivize the purchase by tenants when parks go up for sale.	Directive	Improve is used to direct action and includes actions for improving condition of mobile park homes	Action	The outcome of mobile home parks remaining safe and healthy places to live is being achieved through <i>improving conditions</i> such as <i>creating and distributing educational materials about regulatory responsibilities for addressing issues</i> .	Detailed	Who - The city. What - Improve conditions of mobile park homes so they remain healthy and safe places to live Where - areas with mobile park homes When - Not identified. Why - To mitigate displacement of residents living in mobile park homes How - By giving residents educational material for ways to improve their homes, regulatory requirements, and information about how they could purchase collectively the mobile park home with other tenants from the landlord when it goes up for sale
Kirkland						
No policies identified in this category.						

Manufactured/Mobile Home Park Policy

	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Lakewood						
<u>HO-3.9</u> : Preserve and maintain existing manufactured housing parks as a supply of affordable housing, and encourage long-term housing solutions that will maintain affordable options for resident	Directive	Preserve is used to direct action toward <i>preserv[ing] existing manufactured housing parks to maintain affordable options for residents</i>	Action	The outcome of <i>maintaining affordable options for residents</i> is accomplished through <i>preserv[ing] and maintain[ing] manufactured housing parks</i>	Detailed	Who - The city. What - Preserve and maintain existing manufactured housing parks Where - Mobile park homes and Woodbrook's mobile park home When - Not identified. Why - To preserve affordable housing options How - Not Identified
<u>HO-1</u> : Coordinate outreach to manufactured home park owners and residents to facilitate preservation as affordable housing.	Directive	<i>Coordinate</i> is used to direct action, and the action is <i>preserve existing manufactured housing parks</i> by coordinating <i>outreach to manufacture home park owners and residents.</i>	Action	The outcome of <i>preserv[ing] affordable housing</i> is accomplished through <i>coordinat[ing] outreach to manufactured home park owners and residents</i>	Detailed	Who - The city. What - Coordinate outreach to manufactured home park owners and residents Where - Mobile park homes and Woodbrook's mobile park home When - Not identified. Why - To preserve affordable housing options How - Not Identified
<u>TW 3.2</u> : Establish an overlay district to maintain and preserve existing mobile and manufactured homes as affordable housing options, particularly in Woodbrook.	Directive	<i>Establish</i> is used to direct action toward <i>preserv[ing] existing mobile and manufactured homes</i>	Action	The outcome of <i>preserv[ing] existing mobile and manufactured homes</i> is accomplished by <i>establish[ing] an overlay district</i>	Detailed	Who - The city. What - preserve existing mobile and manufactured housing options Where - Woodbrook's mobile park homes When - Not identified. Why - To preserve affordable housing options How - by establishing an overlay district

Manufactured/Mobile Home Park Policy						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
Lynnwood						
HO 2.3: Protect existing naturally affordable housing, including mobile home and manufactured home parks	Directive	Protect is used to direct action even though it does not specify how it will protect naturally affordable housing	Outcome	The outcome of <i>protect[ing] existing naturally affordable housing</i> is not linked to a specific action.	General	Who - The city. What - <i>Protect naturally affordable housing, including mobile home and manufactured home parks</i> Where - Where naturally affordable housing exists in the city When - Not identified. Why - Not identified. How - Not identified.
Marysville						
HAP 2.2: Support the Preservation of Manufactured Home Parks	Suggestive	Support is used to set goals and aspirations. There is no directive language to implement the support.	Outcome	The outcome of <i>the preservation of manufactured home parks</i> is not supported by a specific action.	General	Who - The city. What - Preservation of Manufactured Park Homes Where - Where manufactured home parks exists in the city When - Not identified. Why - Not identified. How - Not identified.
Port Orchard						
No policies identified in this category.						

Manufactured/Mobile Home Park Policy

Directive v Suggestive			Outcome v Action		Detailed v General	
Category	Reasoning		Category	Reasoning	Category	Reasoning
Tacoma						
<u>H-1.3</u> : Support the maintenance and improvement of the existing housing stock, and encourage the adaptation of the existing housing stock to accommodate a variety of needs.	Suggestive	<i>Support</i> is used to set goals and aspirations. There is no directive language to implement the support.	Outcome	The action of <i>maint[aining] and improv[ing] the existing housing stock and [encouraging adaptation]</i> is not supported by a specific action.	Detailed	Who - The city. What - <i>Support the maintenance and improvement of the existing housing stock, and encourage the adaptation of the existing housing stock</i> Where - Where housing occurs in the city When - Not identified. Why - To <i>accommodate a variety of needs</i> . How - Not identified.
<u>H-1.2</u> : Encourage new and innovative housing types that meet the evolving needs of Tacoma households and expand housing choices in all neighborhoods. These housing types include multi-dwelling units, from duplexes to high-rise developments, small units, accessory dwelling units, prefabricated homes, such as manufactured and modular, co-housing, and clustered housing.	Suggestive	Encourage is used to set goals and aspirations. There is no directive language to implement the support.	Outcome	The outcome of <i>new and innovative housing types that meet the evolving needs of Tacoma households and expand housing choices in all neighborhoods</i> is not linked to an action that will encourage new types of housing.	Detailed	Who - The city. What - Encourage new and innovative housing types to meet needs of Tacoma households Where - where new housing is possible When - Not identified. Why - to meet the needs of Tacoma households How - Not identified.

Manufactured/Mobile Home Park Policy

Directive v Suggestive		Outcome v Action		Detailed v General	
Category	Reasoning	Category	Reasoning	Category	Reasoning
Tukwila					
<u>H2.8</u> : Strive to make alternative and affordable housing options available for residents currently living in substandard housing, such as pre-HUD code mobile homes.	Suggestive	Strive is used to set goals and aspirations. There is no directive language to implement the support.	Outcome	The outcome of available <i>alternative and affordable housing options</i> is not linked to a specific action.	Detailed Who - The city. What - strive to make affordable housing options available to residents currently living in substandard housing Where - residential areas with substandard housing When - Not identified. Why - because people who live in pre-HUD code mobile homes have safety risks and should have affordable housing options How - Not identified.
<u>LU 5.2</u> : Provide and utilize regulations that allow for the continued viability, maintenance, and upgrading of existing manufactured home parks.	Directive	Provide is used to direct action toward using regulations to ensure the <i>maintenance and upgrading of existing MHP</i>	Action	The outcome of <i>the continued viability, maintenance, and upgrad[es] of existing manufactured home parks</i> is linked to the action of <i>provid[ing] and utiliz[ing] regulations</i> .	Detailed Who - residents living in mobile park homes What - strive to make affordable housing options available to residents currently living in substandard housing Where - where mobile park homes exist When - Not identified. Why - because need to mitigate displacement by ensuring regulations are in place to upgrade and maintain peoples' home in mobile parks How - Regulations

Manufactured/Mobile Home Park Policy						
	Directive v Suggestive		Outcome v Action		Detailed v General	
	Category	Reasoning	Category	Reasoning	Category	Reasoning
University Place						
<u>HS2E</u> : Encourages the preservation of the existing stock of mobile home parks as a viable source of affordable and permanent supportive housing.	Suggestive	Encourage is used to set goals and aspirations. There is no directive language to implement the support.	Outcome	The outcome of <i>preserving existing stock of mobile park homes</i> is not linked to a specific action to encourage preservation.	Detailed	Who - The city. What - preserve existing mobile park homes Where - assume where mobile park homes exist already in the city When - Not identified. Why - To support affordable housing . How - Not identified.
<u>HS2H</u> : Allow manufactured homes in all zones where single-family detached housing is permitted, while also ensuring that such housing adheres to design standards applicable to all other residences within the zone.	Directive	Allow is used to state an action whereby the city will allow manufactured homes through zoning regulations.	Action	The action <i>allow manufactured homes ... ensuring that such housing adheres to design standards</i> does not include an intended outcome.	General	Who - The city. What - allowing manufactured homes to exist in areas zones to have detached single-family homes Where - in those specific zoning areas When - Not identified. Why - Not identified. How - Not identified.