

# Housing for All: Implementing HB 1220

New Requirements for Local Housing  
Planning

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Laura Hodgson, Kevin Ramsey, Dawn Couch,  
Sunaree Marshall and Hannah BahnMiller

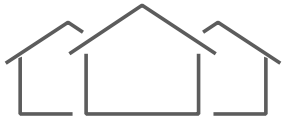
OCTOBER 12, 2022



Washington State  
Department of  
**Commerce**

# We strengthen communities

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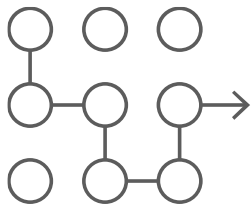
**INFRASTRUCTURE**



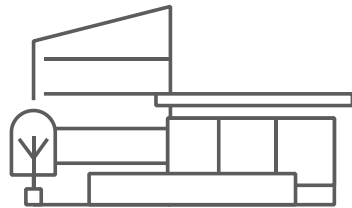
**BUSINESS  
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# Agenda

Context of housing planning and HB 1220 requirements

Projected housing needs guidance

Racially disparate impacts guidance

Implementing HB 1220 – King County perspective

Housing planning for equity – City of Renton perspective



# Need for More Robust Housing Planning

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- Between 2000-2015, new housing production in Washington State fell 225,000 homes short of meeting housing needs\*
- In 2019, 30% of Washington households were cost-burdened
  - This is a sign of under supply
  - Rates of cost-burden are highest in BIPOC communities
- Oregon and California recently took steps to better plan for housing needs
  - Oregon passed House Bill 2001
  - California sets housing targets for jurisdictions and adopted Senate Bill 9
- In 2021, Washington took steps to direct communities to better plan for housing by adopting HB 1220

\*Source: UpForGrowth, 2020

HB 1220:

Changed RCW 36.70A.070 (2): The Housing Element

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**Changed GMA housing goal:**

- “**Plan for and accommodate** ~~encourage the availability of affordable~~ housing **affordable** to all economic segments.”

**Requires Commerce to provide projected housing need to local governments:**

- For moderate, low, very low, and extremely low-income households
- For permanent supportive housing, emergency housing and emergency shelters (referred to as special housing needs)

**Local housing element to:**

- Identify sufficient capacity of land for identified housing needs
- Within urban growth areas (UGAs), moderate density housing options
- Document barriers to housing availability such as gaps in local funding, development regulations, etc.
- Consider housing locations in relation to employment locations
- Consider role of accessory dwelling units (ADUs)

# HB 1220: More Changes...

## Racially Disparate Impacts (RDI), Displacement and Exclusion

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- **Identify local policies and regulations that result in racially disparate impacts, displacement and exclusion in housing:**
  - Zoning that may have a discriminatory effect
  - Areas of disinvestment and infrastructure availability
- **Identify and implement policies and regulations to begin to undo racially disparate impacts, displacement and exclusion in housing**
- **Identify areas at higher risk of displacement**
- **Establish anti-displacement policies, considering:**
  - Preservation of historic and cultural communities
  - Investments in housing for lower income segments
  - Equitable development initiatives and land disposition policies
  - Inclusionary zoning and community planning requirements
  - Tenant protections

# HB 1220: Projected Housing Needs

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**Presenter:**

**Kevin Ramsey, PhD**

**Associate Principal, BERK Consulting**

**[KevinR@berkconsulting.com](mailto:KevinR@berkconsulting.com)**

# HB 1220 PHN Advisory Committee (AC) Members

AC Member	Organization	Title
Brian Jennings	Spokane Housing Authority	Development Director
Brian Parry	Sound Cities Association	Policy Director
Bryce Yadon	Futurewise	Government Affairs Representative
Byron Gumz	Yakima Valley Council of Governments (YVCOG)	Planning Manager
Carl Schroeder	Association of Washington Cities	Government Relations Deputy Director
Chad Eiken	City of Vancouver	Community and Economic Development Director
Jan Himebaugh	Building Industry Association of Washington	Government Affairs Director
Jessica Gwilt	Pierce County Planning	Long Range Planner
Korbie Haley	Office of Rural and Farmworker Housing	Director of Housing Development
Lilith Vespier	City of Leavenworth	Development Services Director
Marc Dones	King County Regional Homelessness Authority	CEO
Michelle Thomas	Washington Low Income Housing Alliance	Director of Policy and Advocacy
Mike Mohrman	Washington State Office of Financial Management	Senior Forecast Coordinator
Paul Jewell	Washington State Association of Counties	Policy Director
Steve Walker	Washington State Housing Finance Commission	Executive Director
Sunaree Marshall	King County Dept. of Community and Human Services	Planning, Policy, and Special Projects Manager
Tedd Kelleher	Washington State Dept of Commerce	Managing Director of Housing Assistance Unit



# New GMA Framework for Updating Housing Elements

- Previous Requirement
- New/Modified Resource or Requirement
- New RDI Requirement

## Statewide Regulatory Context

Washington State Growth Management Act

## Statewide Data Resources

OFM GMA Population Projections by County → Commerce Housing Need Projections by County (2)(a) → Commerce Housing Needs Allocation Tool and Guidance

## Regional Process

Multi-County Planning Policies\*

## Countywide Process

Develop CPPs for coordinated growth planning → Select county population target → Identify countywide housing needs associated with population target → Allocate housing needs to jurisdictions

\*Not all jurisdictions engage in multi-county planning

## Jurisdictional Responsibilities

Document projected housing needs consistent with allocation (2)(a) → Document sufficient land capacity for all housing needs (2)(c) → Identify barriers and limitations to housing production (2)(d) → Document programs and actions needed to achieve housing availability. Consider: All income levels, Employment locations, ADUs (2)(d) → Develop goals, policies, objectives, and mandatory provisions for housing that: Include moderate density options (2)(b), Address and undo racially disparate impacts and exclusion (2)(f), Reduce displacement risk (2)(h)

Establish Public participation program → Identify areas at higher risk of displacement (2)(g) → Identify policies that contribute to disparate impacts (2)(e)

# Projected Housing Needs by Income Level

## Example: Clark County

(Preliminary draft housing need projections based on OFM's 2017 medium population projection)

**Table 2: Projected Countywide Housing Needs Based on User Inputs**

**Clark County**

Population Target = 670,121

	Affordability Level (% of Area Median Income)								Emergency Housing Needs (Temporary)
	Total	0-30%		30-50%	50-80%	80-100%	100-120%	120%+	
		Non-PSH	PSH						
Total Future Housing Needed (2045)	285,310	19,965	3,232	31,198	73,954	45,002	35,640	76,319	4,600
Baseline Housing Supply (2020)	194,005	4,553	588	16,223	60,225	37,292	28,348	46,777	506
Net New Housing Needed (2020-2045)	91,305	15,412	2,644	14,975	13,730	7,711	7,292	29,542	4,094

PSH = Permanent Supportive Housing. This is long-term rental assistance with supportive services (overlap with 0-30% of AMI)

# Allocation Guidance

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1. County selects target for countywide population growth
2. County identifies projected countywide housing needs associated with that population target
3. County and cities work together to determine allocations of countywide need among jurisdictions
  - Needs for all income levels
  - Needs for permanent supportive housing (PSH) and emergency housing
4. Jurisdictions document their allocated share of projected housing needs in their comprehensive plan

# Housing Needs Allocation Tool (HNAT)

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- Excel spreadsheet tool available from Commerce
- Includes housing needs projections for all counties
- Use it to allocate projected countywide housing needs among all jurisdictions in the county
- User can adjust allocation by changing percent shares of growth by jurisdiction
- Two methods for allocation available
- Tool ensures that 100% of all countywide housing needs are allocated to jurisdictions

# Sufficient Land Capacity

Jurisdictions must show that they have sufficient land capacity to meet all projected housing needs, including:

- Moderate, low, very low and extremely low-income households
- Permanent supportive housing
- Emergency housing and shelters
- Duplexes, triplexes and townhomes (within UGA boundary)

*Example Comparison: Step 5*

Income Level (% AMI) and Special Housing Needs	Projected Housing Need	Zone Category That Best Serve These Needs	Aggregated Housing Need	Capacity	Capacity Surplus or Deficit
Emergency housing/shelter	100	High Density + ADUs	1,400	600	<b>-800</b>
0-30% PSH	200				
0-30% Other	400				
>30-50%	300				
>50-80%	400				
>80-100%	200	Moderate Density	500	600	100
>100-120%	300	Low Density	600	1,400	800
>120%	600				
<b>Total</b>	<b>2,500</b>		<b>2,500</b>	<b>2,600</b>	<b>100</b>

## Draft Land Capacity Analysis (LCA) Methodology



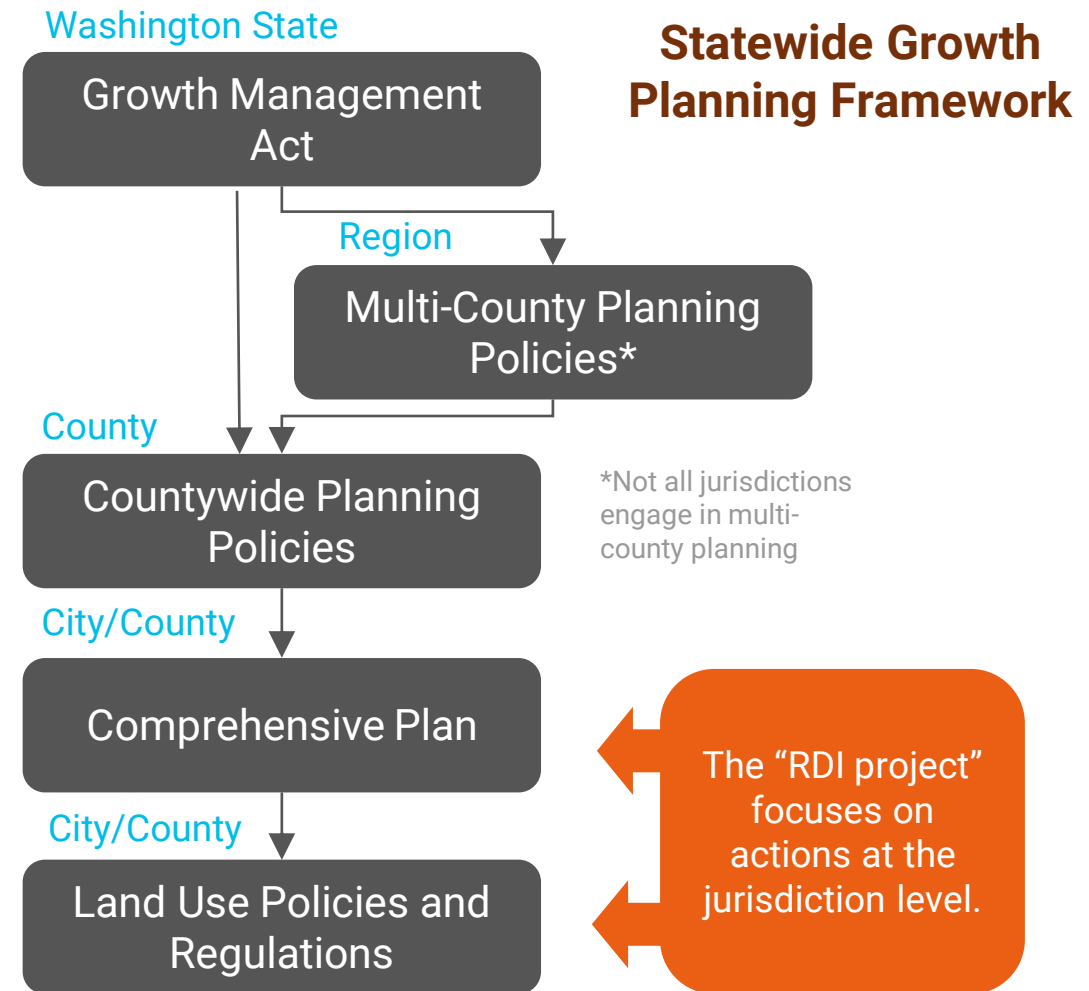
# HB 1220: Racially Disparate Impacts, Displacement and Exclusion in Housing

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**Presenter:**  
**Dawn Couch**  
**Senior Project Manager, BERK Consulting**  
[Dawn@berkconsulting.com](mailto:Dawn@berkconsulting.com)

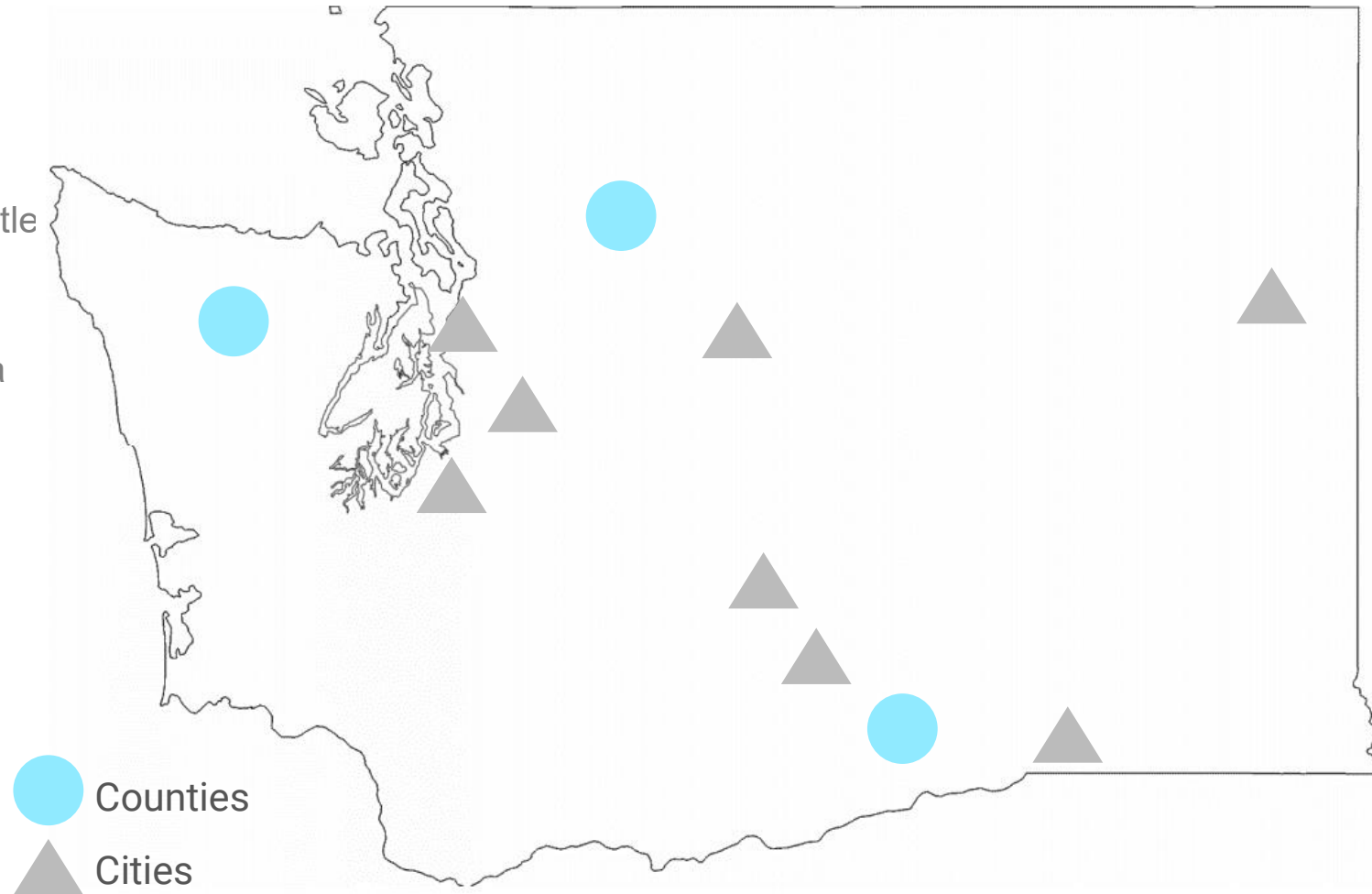
# Additional Changes by HB 1220

- HB 1220 added greater specificity around equity for the requirements of the housing element
- In addition to the establishing housing targets for all economic segments (items “a-d”), GMA also requires jurisdictions to:
  - Identify policies and regulations that result in racially disparate impacts and establish policies to address and undo those impacts (items “e” and “f”).
  - Identify areas at higher risk of displacement and displacement risk and establish anti-displacement policies (items “g” and “h”).



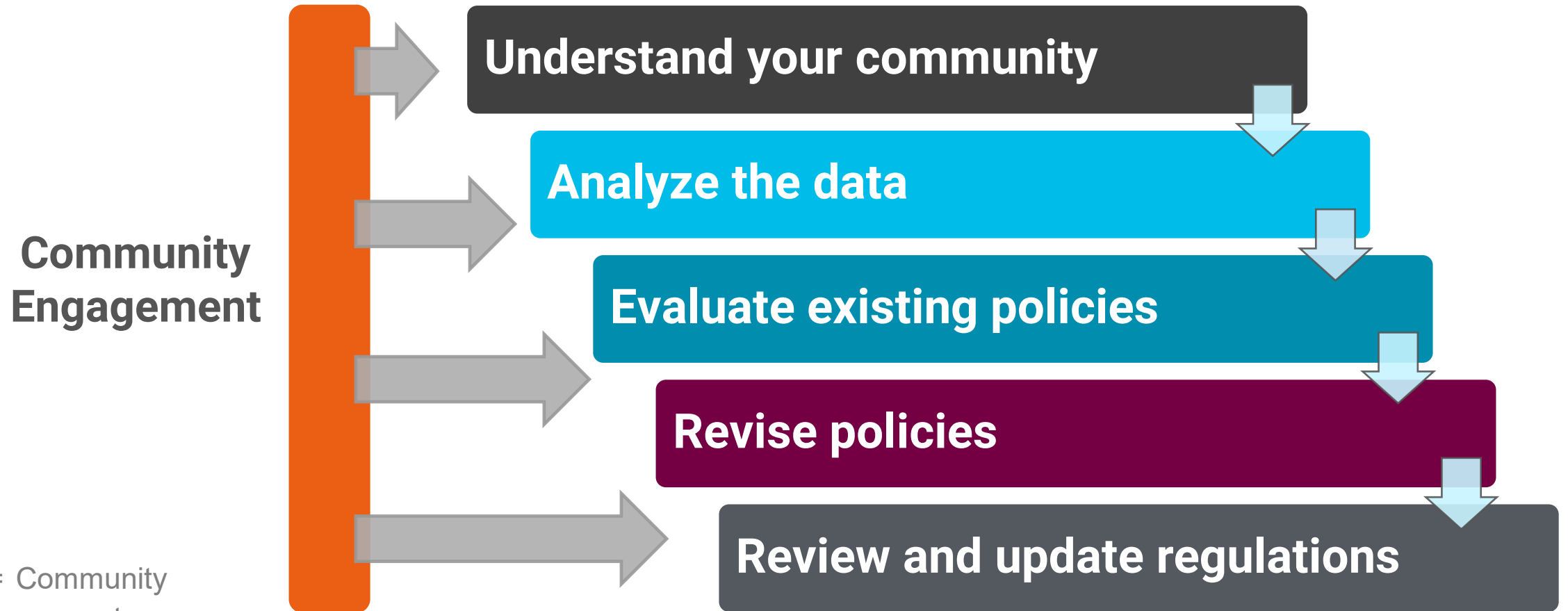
# Advisory Work Group Members

- **Rebecca Deming**, City of North Bend
- **Ardele Steele**, City of Zillah
- **Jessica Sanclemente-Gomez**, City of Seattle
- **Brent Butler**, Jefferson County
- **Elizabeth Chamberlain**, City of Walla Walla
- **Hannah Bahn Miller**, City of Renton
- **Amber Piona**, Snohomish County
- **Maren Murphy**, City of Spokane
- **Michelle Cooke**, Benton County
- **Elliot Barnett**, City of Tacoma
- **Joseph Calhoun**, City of Yakima





# Overview of Recommended Methodology



\* = Community engagement

# Example Check List

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## Understanding your community and data analysis check list

- Did you **look at local historical factors** that could lead to racially disparate impacts? \*
- Did you **meet with representatives of communities** that have been subject to historical injustices, different racial identities, or those most impacted by housing struggles? \*
- Did you look at housing data **disaggregated by race**?
- Did you determine whether there is **evidence** of racially disparate impacts, displacement or exclusion in housing?
- Did you conduct a **displacement risk assessment**?
- Did you **review the data evidence with impacted community members** to get their perspectives on the policies, regulations, actions or root causes driving the disparities in outcomes? \*

# Insights from the Effort

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- No one feels like an expert.
- There are a few racial disparity analysis models, but none that we know of that would work for all communities in Washington state.
- Many have done Housing Action Plans or other equity-focused efforts that provide helpful starting places.
- It is hard for jurisdictions to “prove” causal relationships between local planning regulations and disparate impacts, but reviewing the evidence of disparities is important for improving policy.
- In many communities, large lot zoning is exclusionary.
- Solutions and strategies may fall outside the housing element.

# Implementing HB 1220: King County Perspective

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**Presenter:**

**Sunaree Marshall**

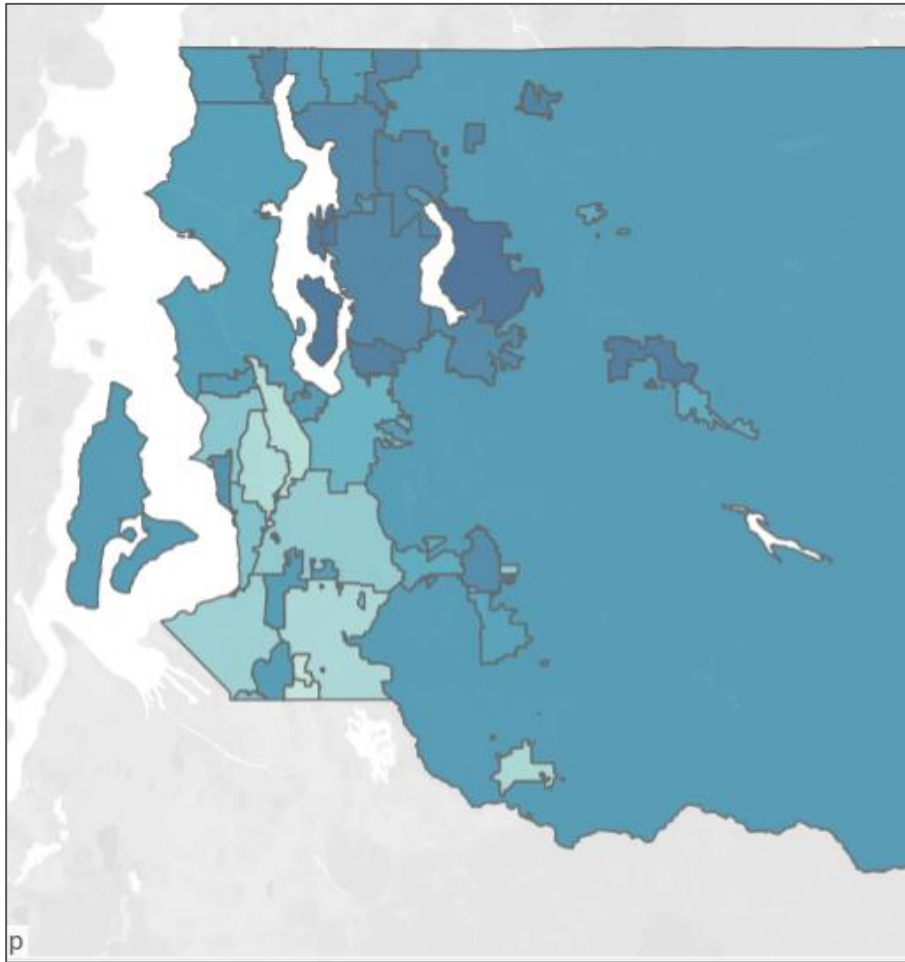
**Housing Policy and Special Projects Manager,  
King County Department of Community and Human Services**

**[Sunaree.Marshall@kingcounty.gov](mailto:Sunaree.Marshall@kingcounty.gov)**

A decorative graphic on the left side of the slide, consisting of a network of light blue lines and circles resembling a circuit board or data flow diagram. The lines are vertical and horizontal, with small circles at various points, creating a complex, interconnected pattern.

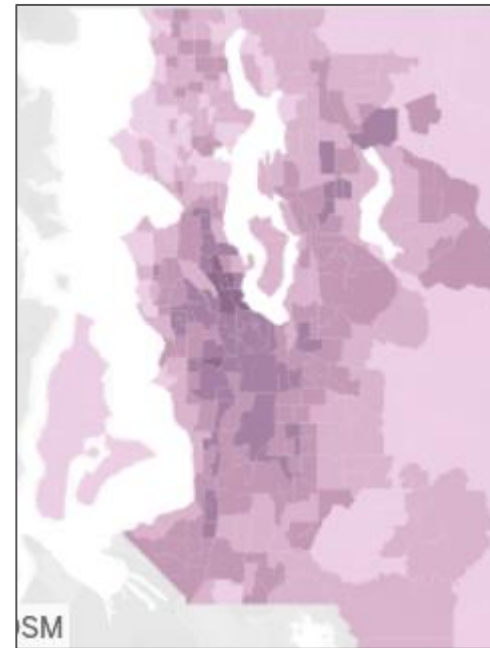
# KING COUNTY CONTEXT

# Inequitable Distribution of Housing Choice Across Jurisdictions

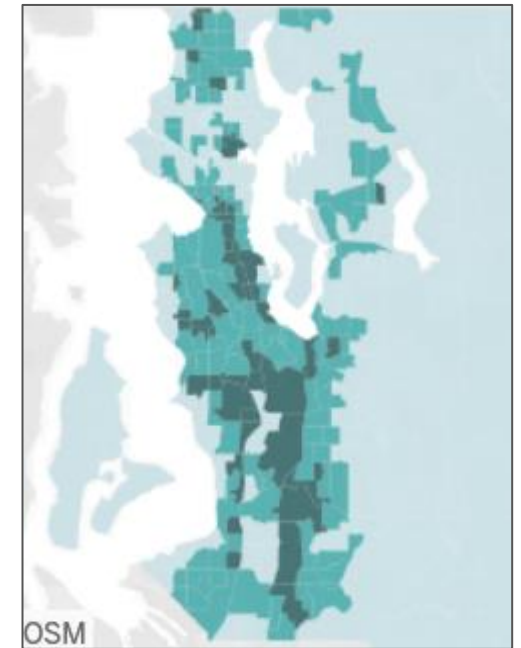


Percent of housing units affordable at or below 80% AMI (2014-2018 CHAS)

# Past and Ongoing Displacement of Low-income & BIPOC Communities



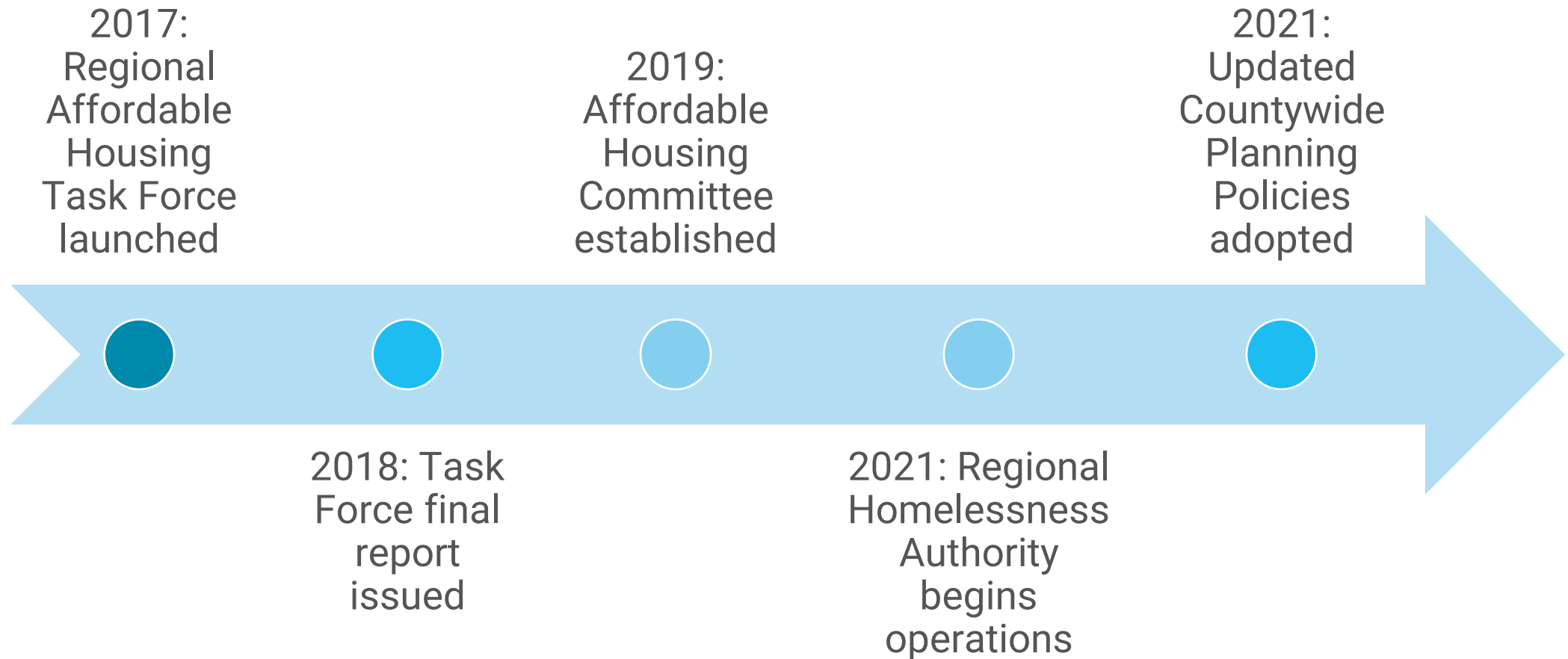
% BIPOC (2015-19 ACS)



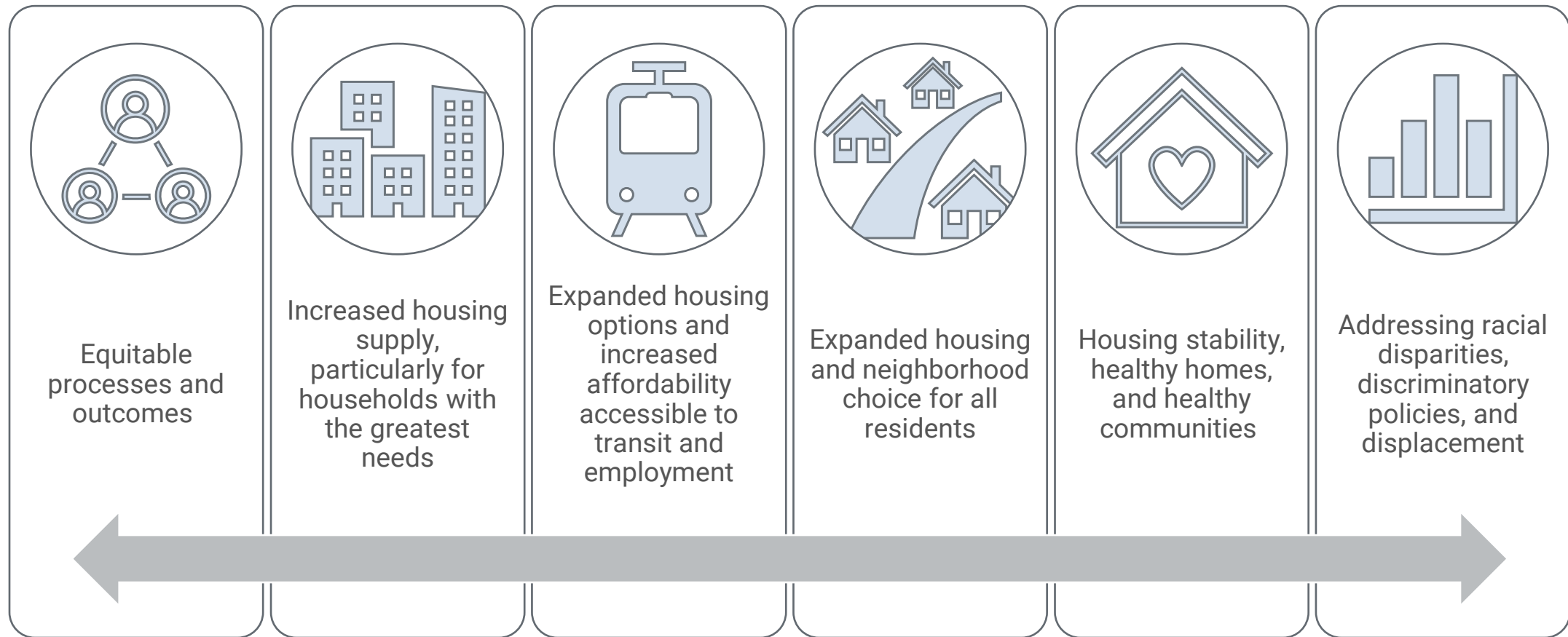
Displacement Risk (PSRC)

# Increased Attention to Housing Needs

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# King County CPPs Align with HB 1220



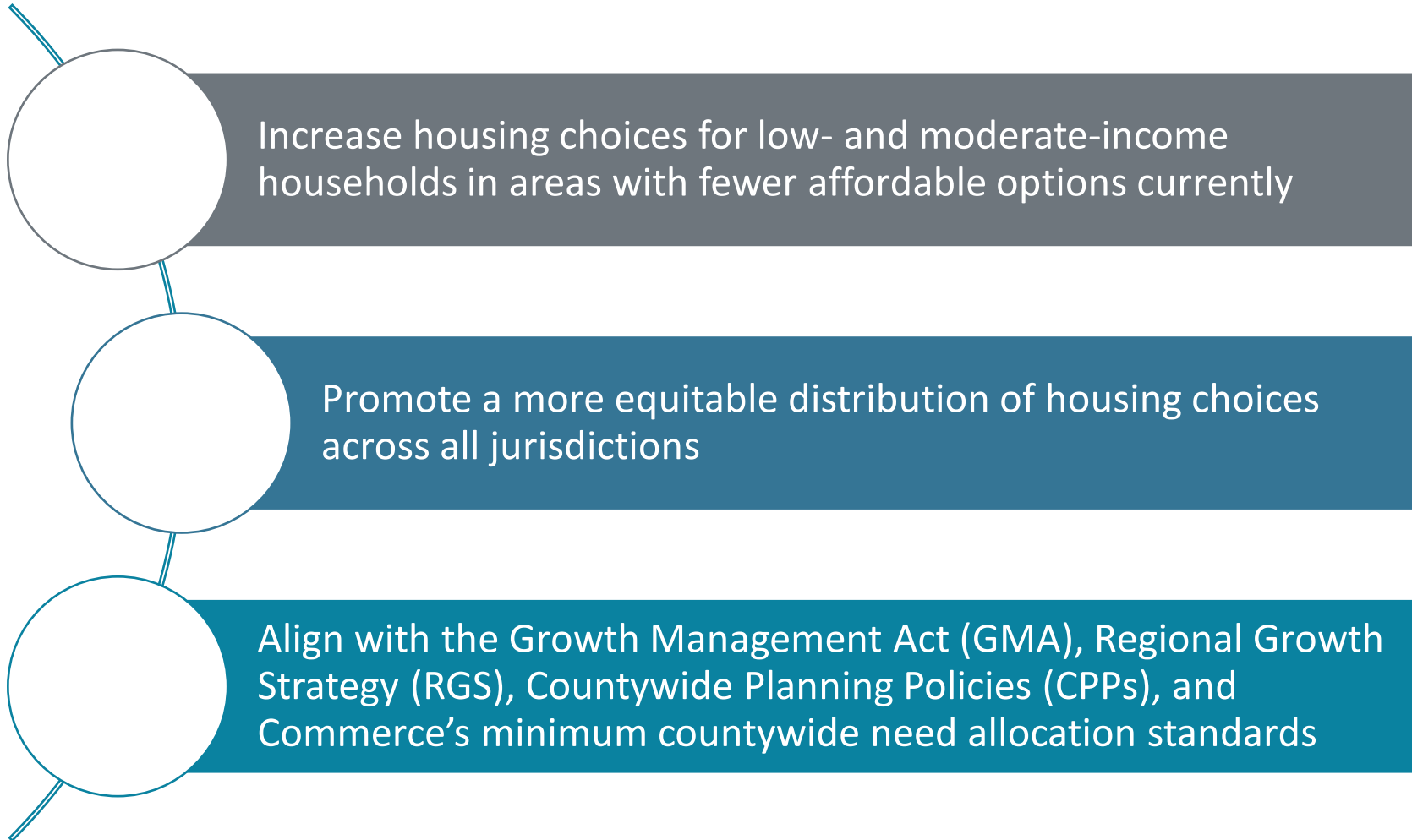


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# COUNTY-LEVEL IMPLEMENTATION

# King County Principles for Allocation

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# Allocating Jurisdictional Housing Needs

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- Commerce data provides helpful boundaries:

## Method A: Focus on new growth

- Same shares of new housing growth are affordable in every jurisdiction
- “Everyone does the same thing”

## Method B: Focus on planning horizon year

- Same shares of total housing stock in 20XX are affordable in every jurisdiction
- “Everyone tries to reach the same goal”

# Allocating Jurisdictional Housing Needs

- But we want to adjust for local factors

## Method A: Focus on new growth

- Same shares of new housing growth are affordable in every jurisdiction
- “Everyone does the same thing”

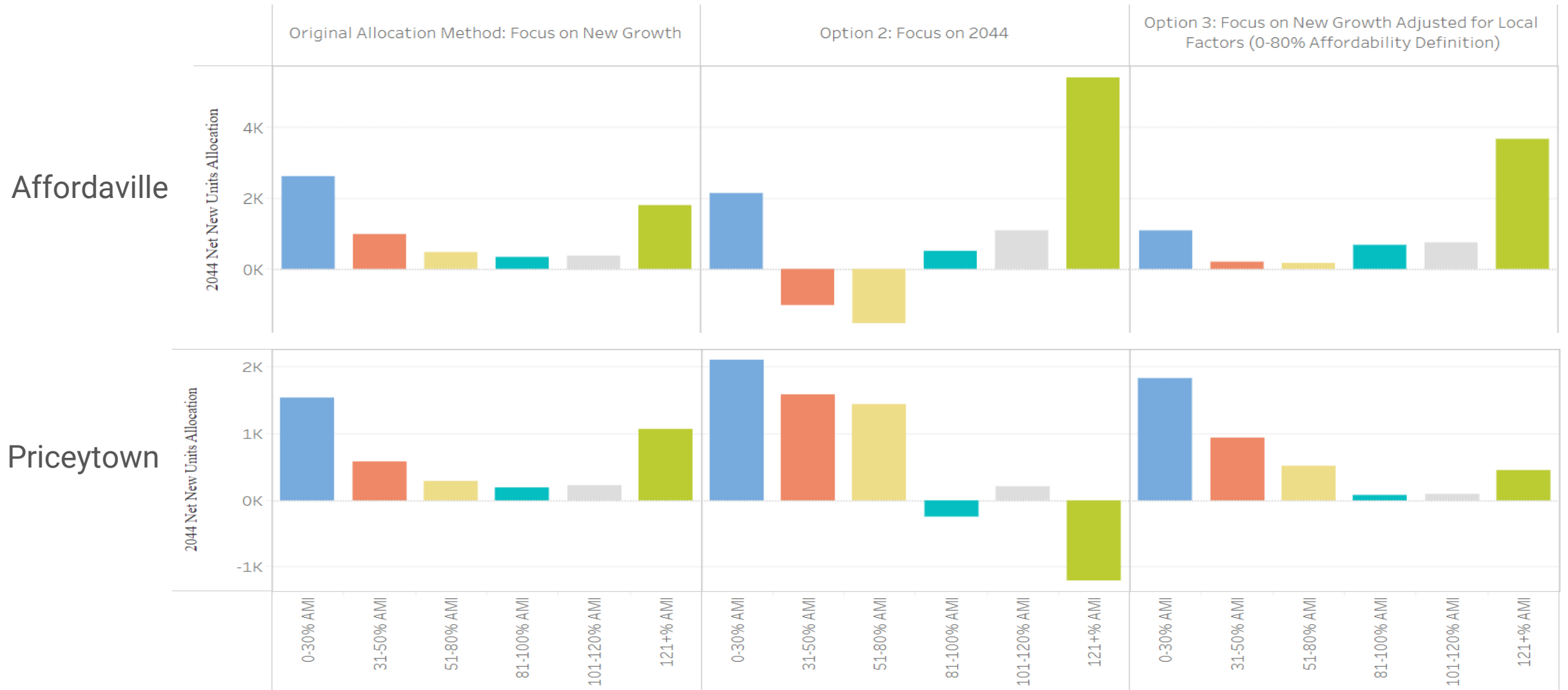
## Method B: Focus on planning horizon year

- Same shares of total housing stock in 20XX are affordable in every jurisdiction
- “Everyone tries to reach the same goal”

## Method C: Focus on new growth adjusted for local factors

- Adjust Method A for increased housing choice in places with
  - fewer affordable housing options,
  - fewer income-restricted housing options, and
  - a greater imbalance of low-wage workers to low-wage jobs

# Options | Results



# Decision-making Process

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- **Rely on existing collaborative structures with planners and housers:**
  - Affordable Housing Committee
  - Community Partners Table
  - Growth Management Planning Council
  - Planning Directors' meetings
  - Staff workgroups
  - Sub-regional collaborations
- **Focus on staff workgroups to refine approach (get in the weeds!)**
- **Elevate message to outcomes, not methodologies for decision-makers**
- **Collaborate with Human Services staff**

# Key Messages

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- Planning and regulatory changes are **necessary, but insufficient** to create affordable housing in high-cost markets
  - Funding is crucial
- Jurisdictions must plan for both **local and regional** housing needs
- **Growth targets** directly impact the ability to accommodate additional affordable housing
- This process will likely **impact the densities** of housing a jurisdiction is planning for (and that won't always be popular)
- Some jurisdictions need to aggressively plan to **preserve existing affordability** while others need to dramatically **increase their affordable housing supply**
- Income band needs and special housing needs are **a foundation**
  - Also need to think about culturally relevant housing, large family units, people with disabilities, etc.

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# UNSOLICITED ADVICE



# Questions to Help Tailor Allocations Locally

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- **Which communities are currently affordable and which aren't?**
  - How does this landscape relate to access to transit, jobs, quality schools, etc.?
- **Where do low-income people and Black, Indigenous, and people of color currently live?**
  - Were they or could they be displaced or excluded by increased growth?
  - How broad are their options of where else to live?
- **Where are there planned infrastructure or other investments that align well with housing?**
  - Is there a need to plan for affordability to mitigate displacement?
- **What decisions have jurisdictions already collectively made about where and how to grow?**
  - How might this change if you intentionally plan for affordable housing?

# Allocation and Accountability Process

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- How can you consult with people most impacted by housing instability?
- Are there collaborative spaces for planners or elected officials to discuss housing needs across jurisdictions?
- Are human services and housing staff connected to and aligned with long range planning staff?
- How can you track progress/affordability over time?

# Implementing HB 1220: City of Renton Perspective

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**Presenter:**

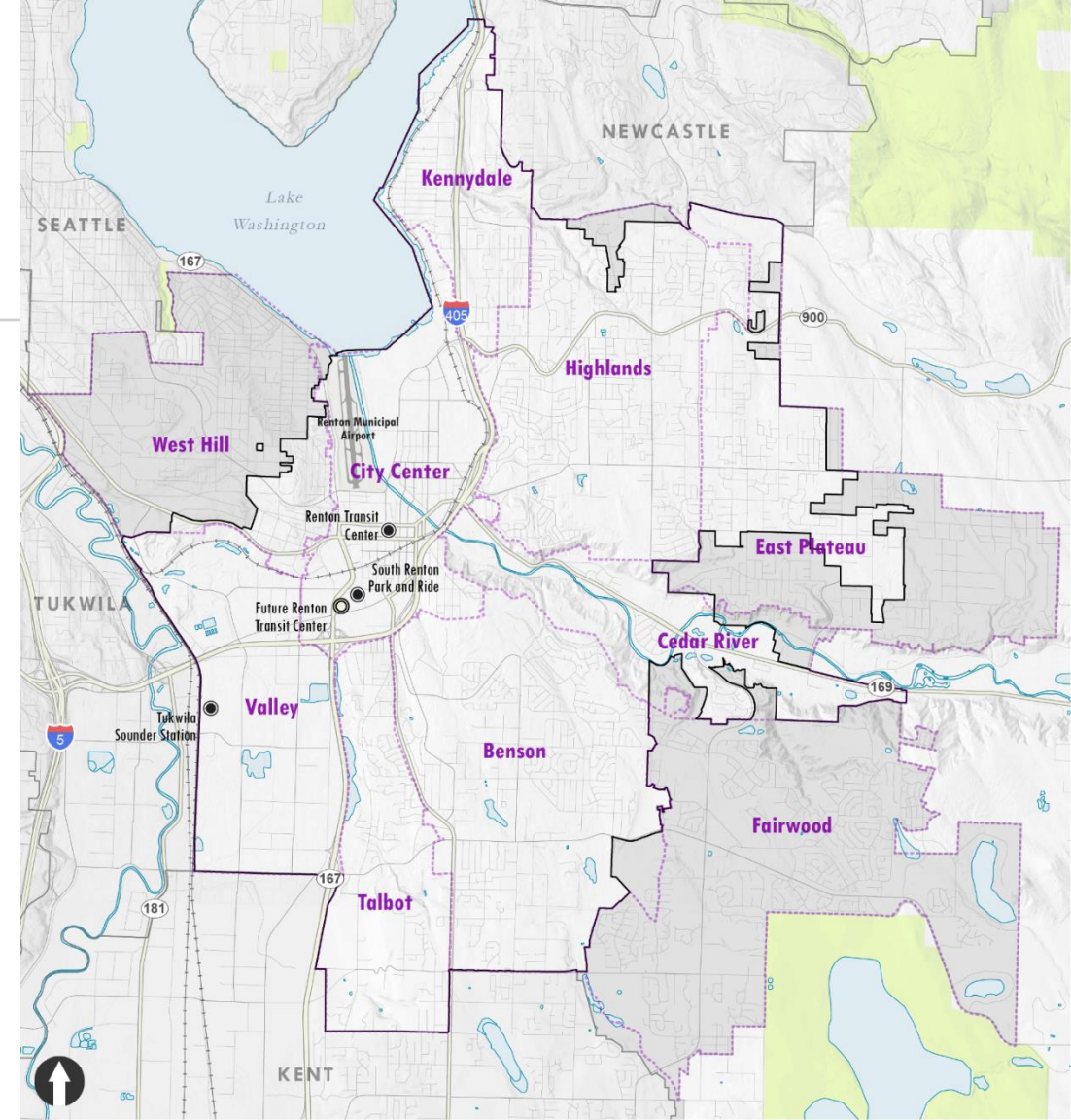
**Hannah Bahn Miller**

**Community Development and Housing Manager, City of Renton**

**[hbahnmiller@rentonwa.gov](mailto:hbahnmiller@rentonwa.gov)**

# Renton Context

- Suburban City in South King County
- Population of 107,500 (OFM 2022)
- Three potential annexation areas (PAAs)
- “Minority-Majority” City



## LEGEND

- |                          |                        |
|--------------------------|------------------------|
| City of Renton           | Highways/State Routes  |
| Community Planning Areas | Arterials              |
| Other cities             | Other streets          |
| Urban Growth Areas       | Rail                   |
| Public lands             | Major Transit Stations |
| Water                    | Future Transit Center  |

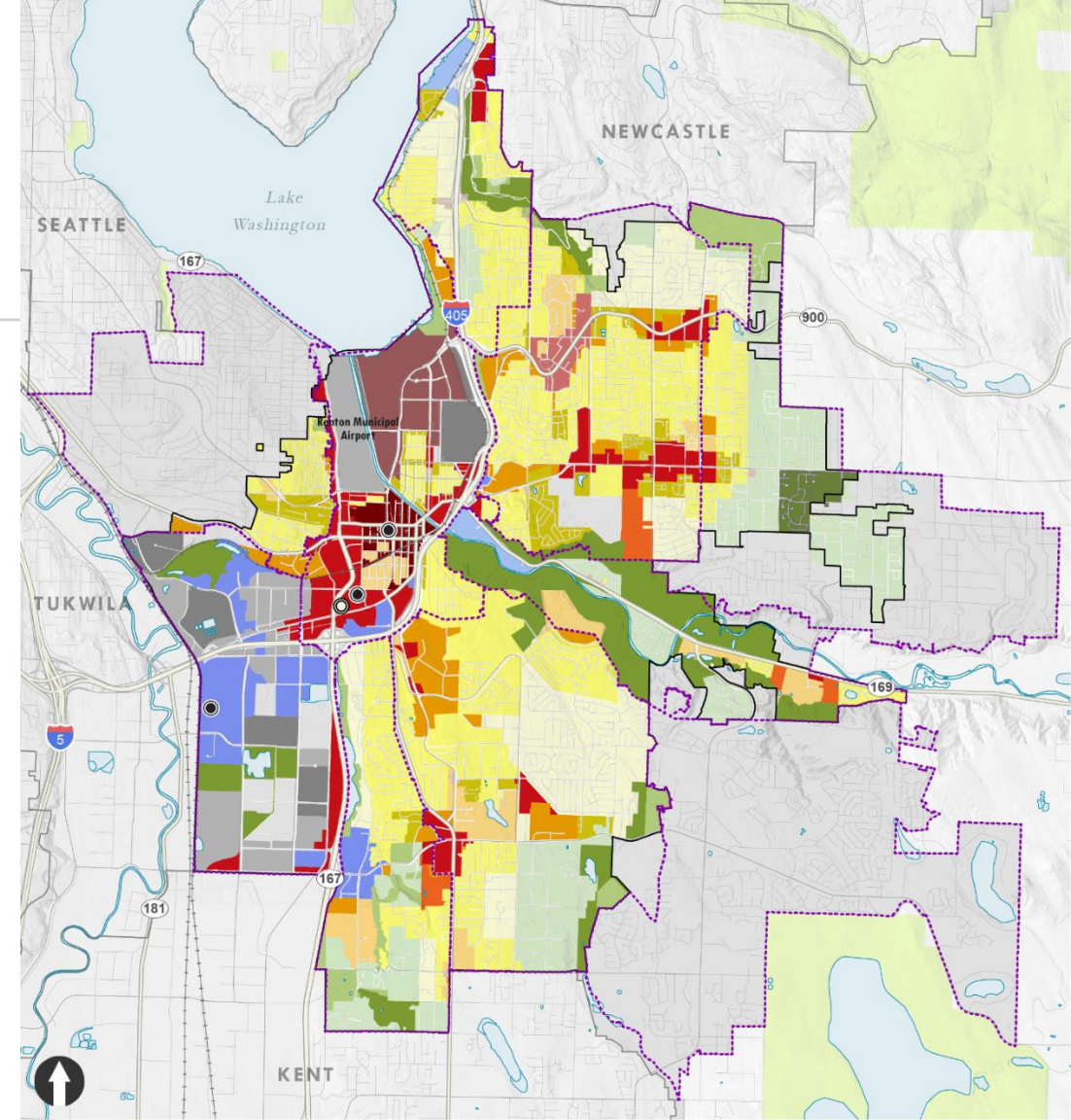
**BERK**

Map Date: July 2020

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# Renton Context

- 43,733 housing units (OFM, 2022)
- On average, 438 units developed/year (2011-2019, OFM)
- 81% of land primarily single-family zones
  - No zone exclusively single family as provisions for ADUs and cottage housing exist across zones



## LEGEND

### Renton Zoning

RC-Resource Conservation	CN-Commercial Neighborhood
R1-Residential	CV-Center Village
R4-Residential	CA-Commercial Arterial
R6-Residential	UC-Urban Center
R8-Residential	CD-Center Downtown
R10-Residential	COR-Commercial Office/Residential
R14-Residential	CO-Commercial Office
RMF-Residential Multi-Family	IL-Industrial - Light
RMH-Residential Manufactured Homes	IM-Industrial - Medium
	IH-Industrial - Heavy

City of Renton	Highways/State Routes
Community Planning Areas	Arterials
Other cities	Rail
Urban Growth Areas	Major Transit Stations
Public lands	Future Transit Center
Water	

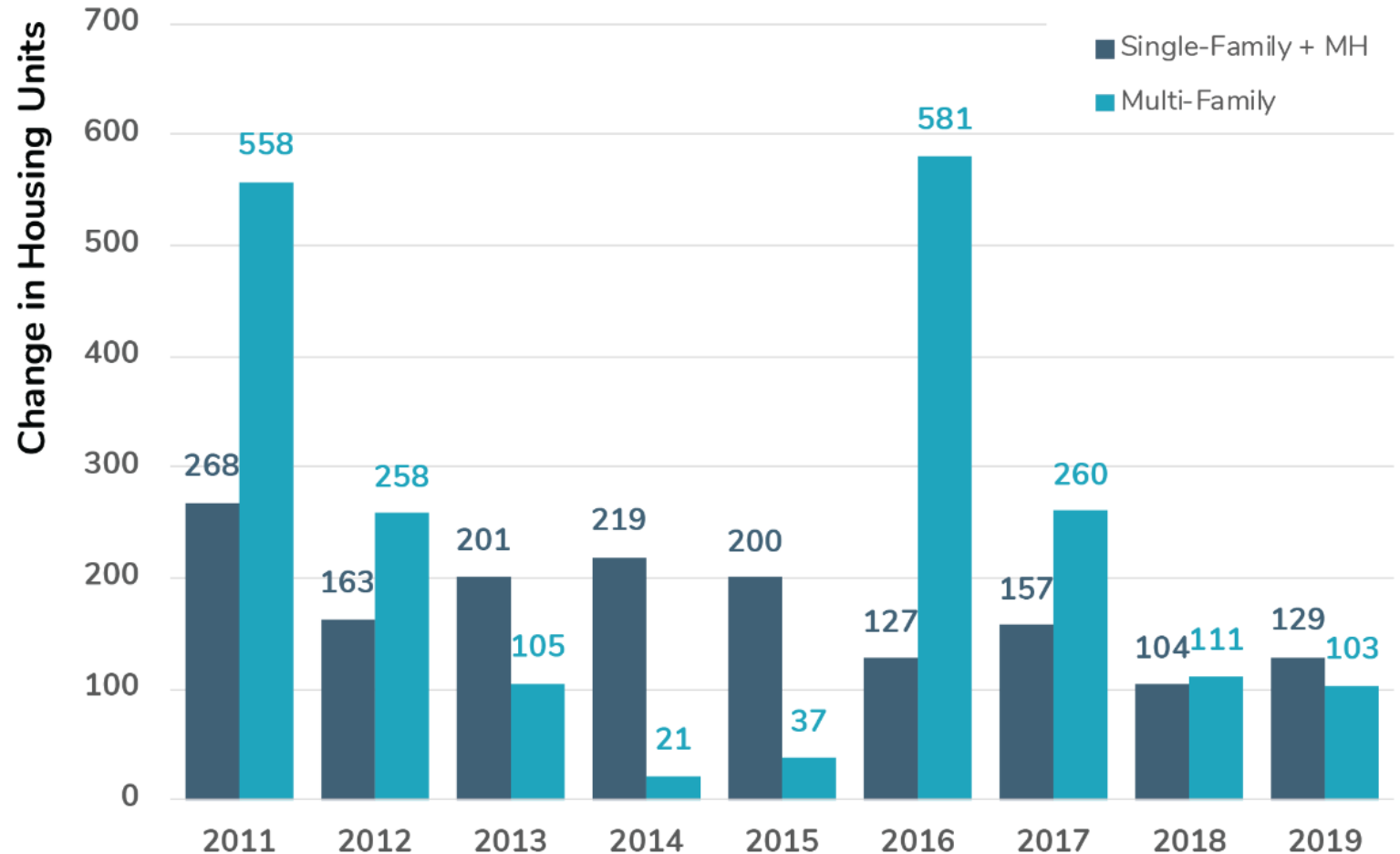


Map Date: July 2020



# Renton Context

Net Change in Housing Units in Renton by Type, 2011-2019 (OFM, 2020)



# Past Housing Work

**HOUSING AND HUMAN SERVICES ELEMENT**



**HOUSING & HUMAN SERVICES ELEMENT**  
*- Working to provide opportunity for those with need -*

City of Renton

## **HOUSING ACTION PLAN**

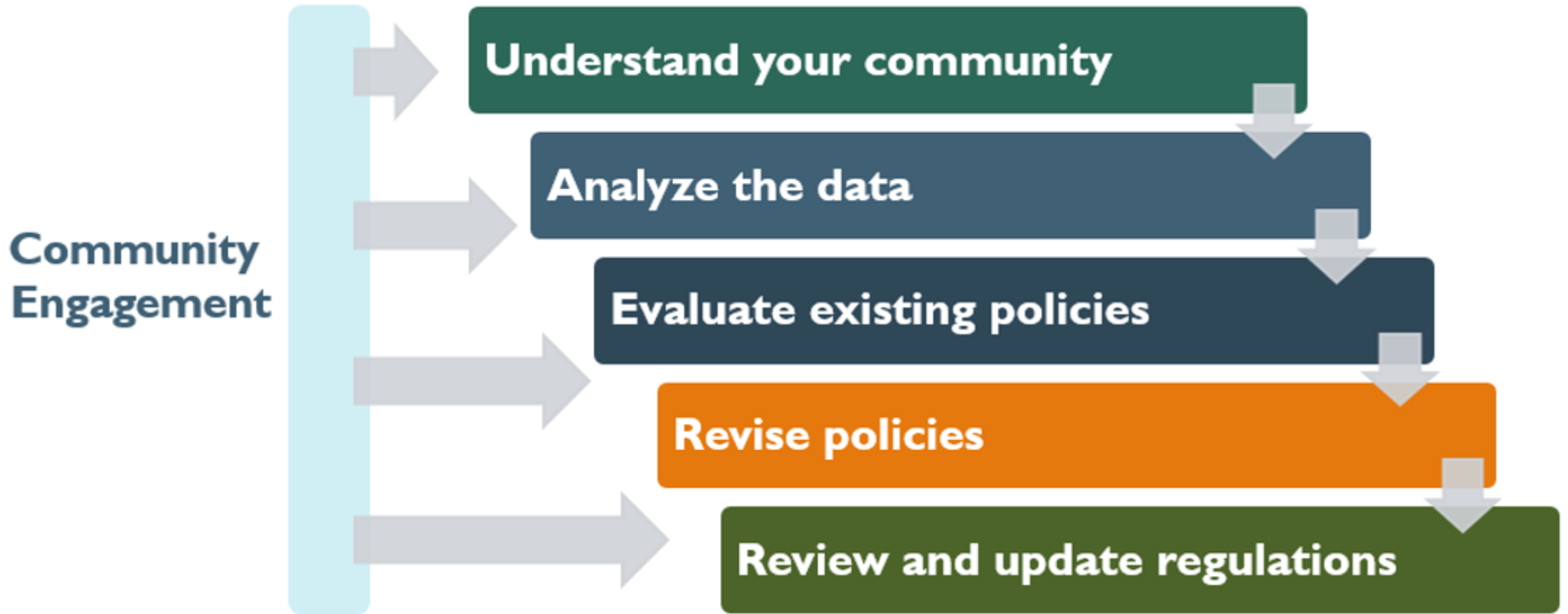


JULY 2021

**EQUITY, HOUSING, AND HUMAN SERVICES**

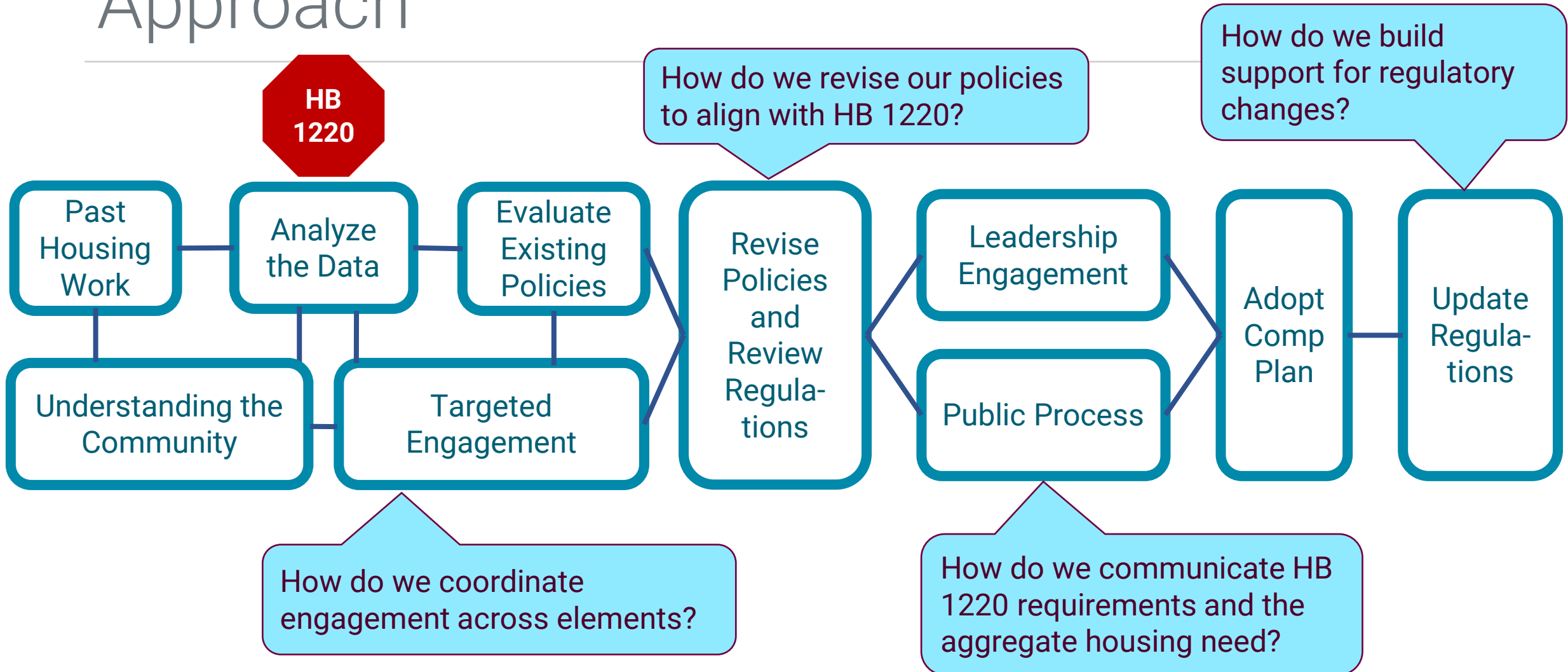
# Approach

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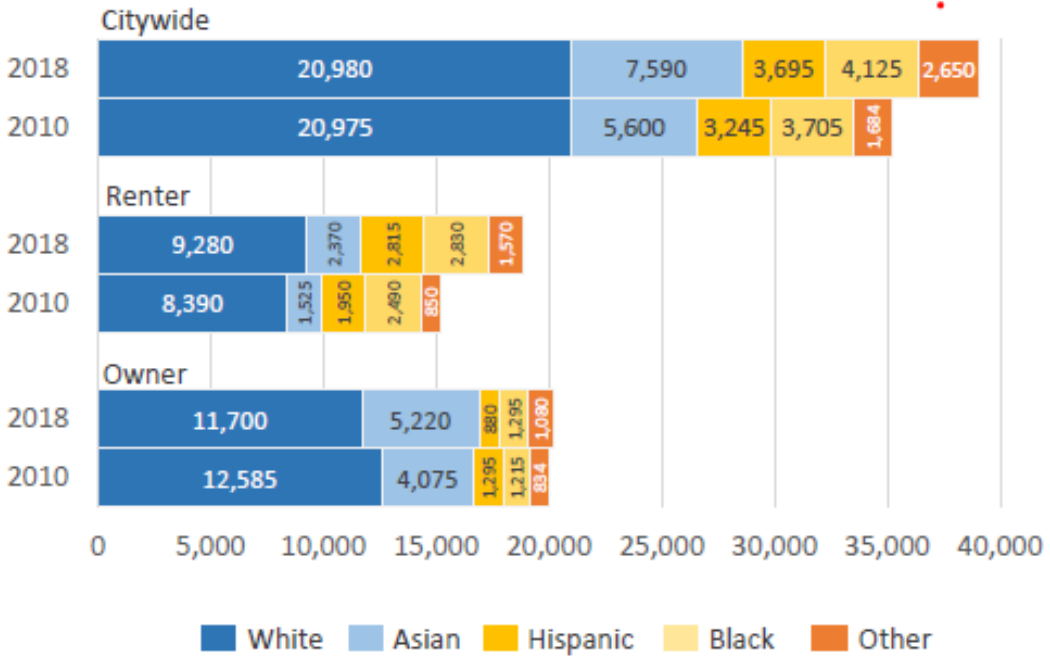
# Approach



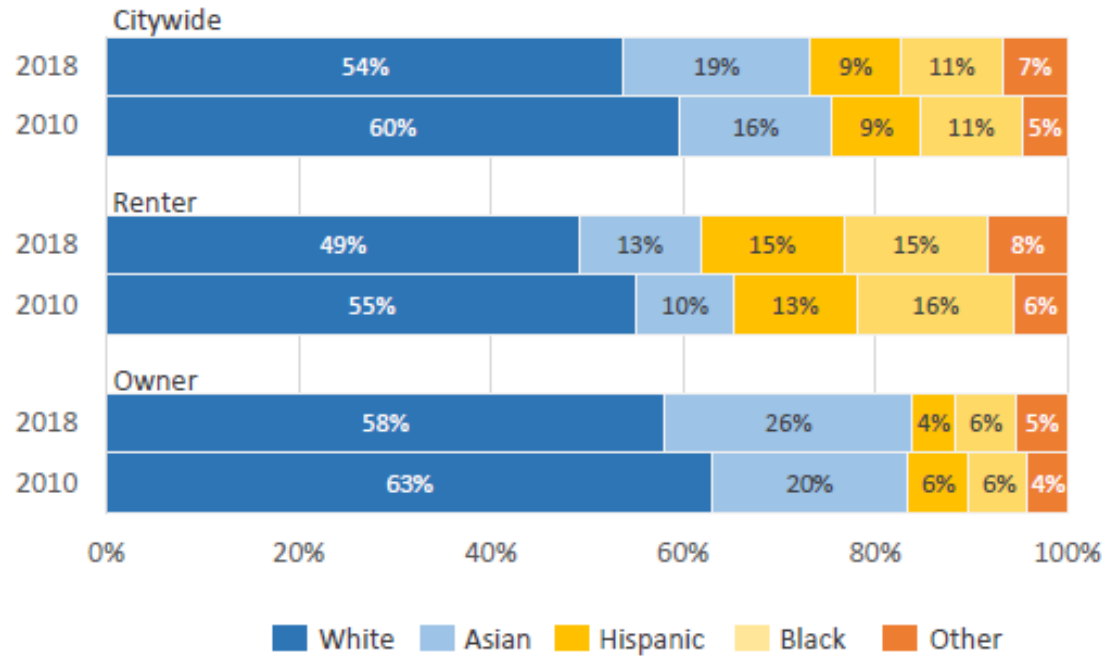
# Analyze the Data

## Race

**B-7. Number of Households by Race and Tenure (2010-2018)**



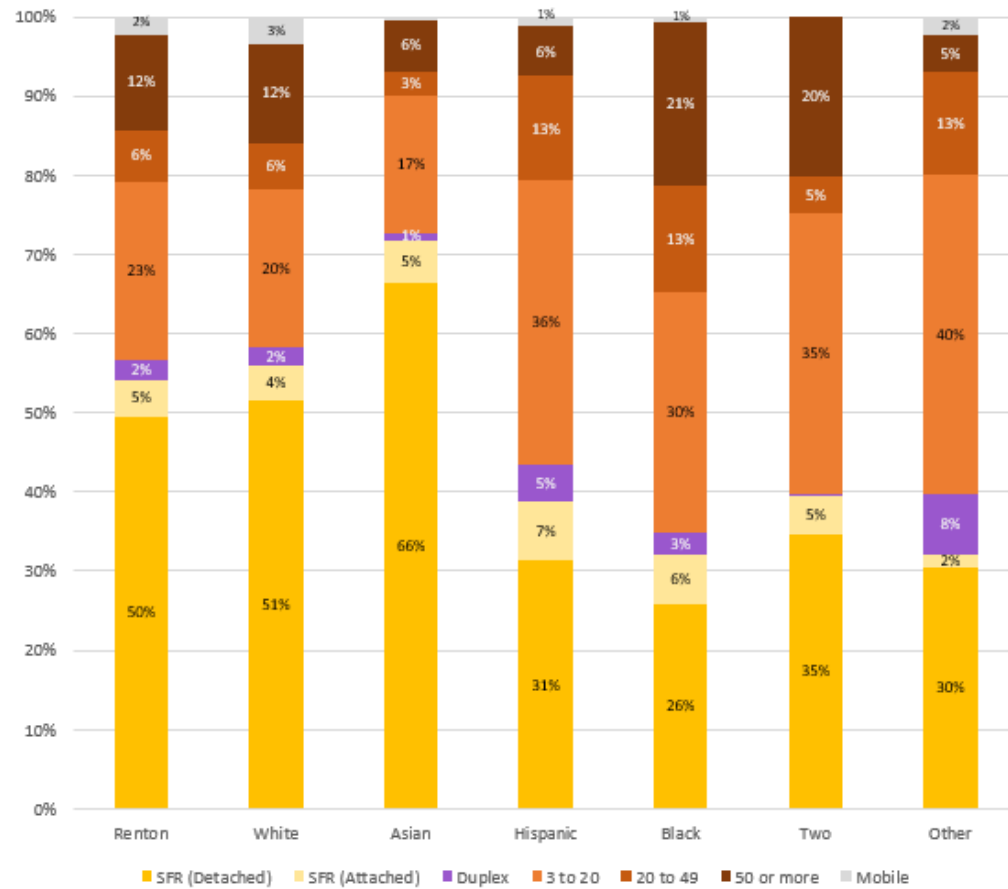
**B-8. Percentage of Households by Race and Tenure (2010-2018)**



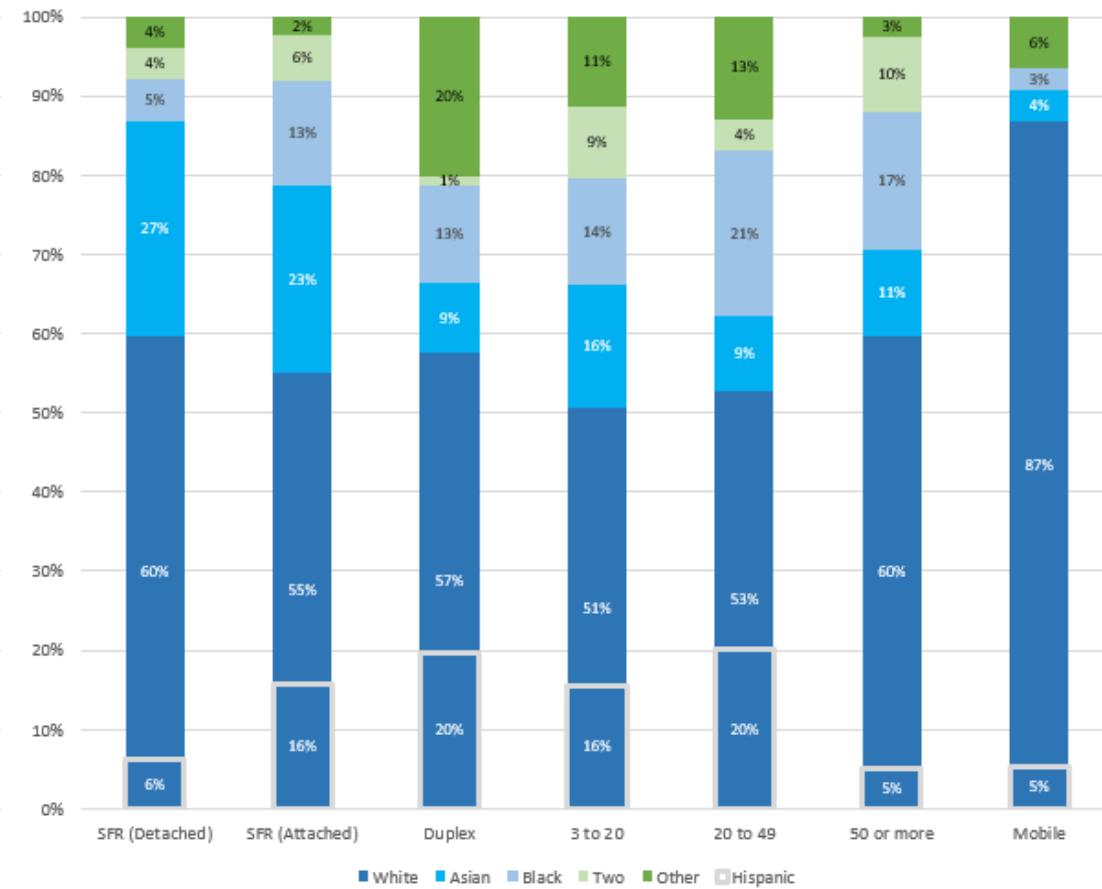
Data source: CHAS 2010-2018

# Analyze the Data

## Zoning and Building Type by Race



2019 Race by Building Type  
(2015-2019 ACS, Units in Structure by Race)



2019 Building Type by Race  
(2015-2019 ACS, Units in Structure by Race)

# Understanding the Community

- Focus on connecting to past and concurrent engagement efforts
- Leveraging existing relationships between City staff and the community
- Using resources to support more equitable engagement



## Renton Housing Action Plan 2020

### Community Conversations

The City of Renton is creating a Housing Action Plan to provide “how to” guidance to encourage more housing options in Renton.

Project staff are available to host virtual conversations with the community about housing in Renton. If you are interested in learning more, please contact:

Hannah Bahnmitter, Housing Programs Manager  
hbahnmitter@rentonwa.gov  
206-503-3426

For more information on the project, visit  
[rentonwa.gov/hap](https://rentonwa.gov/hap)



# Strengths

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- **Organizational infrastructure for housing**
  - Identified housing staff
  - Housing Action Plan
  - Regional participation in housing forums
- **Stated focus on equity**
  - New department of equity, Housing & Human Services
  - Engagement with forum like Mayor's Inclusion Taskforce and Equity Commission



# Opportunities

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- **Transparency and accountability**
  - Building alignment around housing goals and requirements
  - Operationalizing tracking and monitoring
- **Balancing historic affordability with future needs**
- **Deepening authentic engagement that builds trust with community**



# Questions?



Washington State  
Department of  
**Commerce**

[www.commerce.wa.gov](http://www.commerce.wa.gov)



HB 1220 project website:

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

(Growth Management → Planning for Housing → Updating GMA Housing Elements)

# Thank you!

Laura Hodgson

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**Commerce**

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