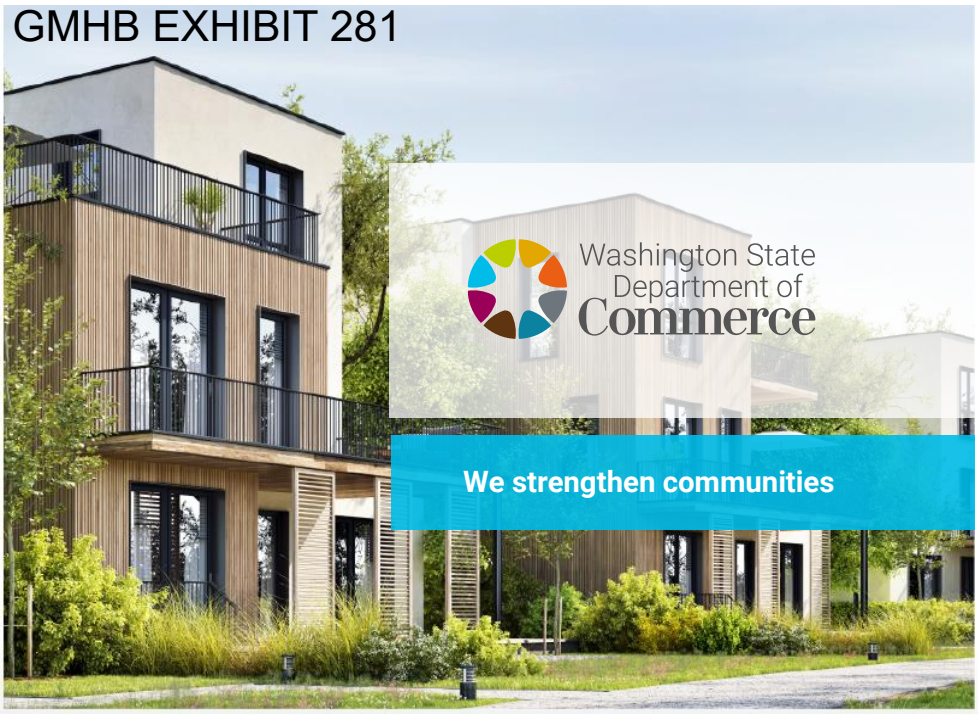
GMHB EXHIBIT 281



Washington State Department of Commerce

We strengthen communities

# Establishing Housing Targets for your Community

County-level considerations for housing planning

LOCAL GOVERNMENT DIVISION
GROWTH MANAGEMENT SERVICES

v3.4

# About this document

The Washington State Department of Commerce's Growth Management Services (GMS) team assists and guides local governments, state agencies and others to implement the Growth Management Act (GMA).

In 2021, the Washington Legislature changed the way communities are required to plan for housing. House Bill 1220 (HB 1220)[1] amended the GMA to require local governments to "plan for and accommodate" housing affordable to all income levels. This significantly strengthens the previous goal, which was to "encourage" affordable housing.

# Organization of the guidance

This guidance is part of a suite of documents that guide local jurisdictions on how to update their housing elements:

- **Book 1: Establishing Housing Targets for your Community (this document)**
  - Countywide Planning Policies*
  - Housing Needs Projection Methodology & Housing for All Planning Tool (HAPT)
  - Guidance for Allocating Projected Countywide Housing Needs to Local Jurisdictions
- **Book 2:** Guidance for Updating your Housing Element
  - Updated Housing Element Requirements with HB 1220
  - Guidance for Evaluating Land Capacity to Accommodate all Housing Needs
  - Guidance for Making Adequate Provisions to Accommodate all Housing Needs
  - Housing Needs Assessment (see also Guidance for Developing a Housing Needs Assessment[2])*
  - Housing Element Review*
  - Updating Goals and Policies*
  - Identifying Strategies to Implement Your Policies*
  - Adopting, Implementing and Monitoring Your Housing Element*
- **Book 3:** Guidance to Address Racially Disparate Impacts[3]
  - Recommended Process
  - Step 1: Engage the Community
  - Step 2: Gather and Analyze Data
  - Step 3: Evaluate Policies
  - Step 4: Revise Policies
  - Step 5: Review and Update Regulations

**Items are from the* Guidance for Updating Your Housing Element[4] *(2021, Commerce).*

For additional information on the GMA housing programs, please visit the GMS Planning for Housing Webpage[5] or contact Anne Fritzel, Housing Programs Manager, at Anne.Fritzel@commerce.wa.gov.

---

[1] https://lawfilesext.leg.wa.gov/biennium/2021-22/Pdf/Bills/Session Laws/House/1220-S2.SL.pdf?q=20211209114015
[2] https://deptofcommerce.box.com/s/mop7xrkzh170th1w51ezbag3pmne9adz
[3] https://deptofcommerce.box.com/s/1l217l98jattb87qobtw63pkplzhxege
[4] https://deptofcommerce.app.box.com/s/ig3pd55wrngxacxjwnt6hv98ue8swaj6
[5] https://www.commerce.wa.gov/serving-communities/growth-management/growth-management-topics/planning-for-housing/

# Acknowledgments

**Washington State Department of Commerce**
Director: Mike Fong
Local Government Division: Mark Barkley, Assistant Director
Growth Management Services: Dave Andersen, AICP, Managing Director

**Editors**
Anne Aurelia Fritzel, AICP, GMS Housing Programs Manager
Laura Hodgson, Senior Planner

**Content Development**
BERK Consulting:
Kevin Gifford
Stefanie Hindmarch
Josh Linden
Kevin Ramsey, PhD

The Cloudburst Group:
Scott Pruitt

**Advisory Committee**
Marc Dones, King County Regional Homelessness Authority
Chad Eiken, City of Vancouver
Byron Gumz, Yakima Valley Council of Governments
Jessica Gwilt, Pierce County Planning Department
Korbie Jorgensen Haley, Office of Rural Farmworker Housing
Jan Himebaugh, Building Industry Association of Washington
Brian Jennings, Spokane Housing Authority
Paul Jewell, Washington State Association of Counties
Tedd Kelleher, Washington State Department of Commerce
Sunaree Marshall, King County Department of Community and Human Services
Mike Mohrman, Washington State Office of Financial Management
Brian Parry, Sound Cities Association
Carl Schroeder, Association of Washington Cities
Michelle Thomas, Washington Low Income Housing Alliance
Lilith Vespier, City of Leavenworth
Steve Walker, Washington State Housing Finance Commission
Bryce Yadon, Futurewise

**Washington State Department of Commerce**
www.commerce.wa.gov

For people with disabilities, this report is available on request in other formats.
To submit a request, please call 360-725-4000 (TTY 360-586-0772).

Published July 2023.

# Table of Contents

# Introduction

The Growth Management Act (GMA), adopted in 1990, provides the statewide framework for Washington state to manage its growth, provide sufficient infrastructure and services for its residents, and preserve sensitive environmental resources. The GMA performs these functions by requiring local communities most affected by growth to engage in 20-year land use planning and to concentrate development in urbanized areas to efficiently use infrastructure.

To successfully plan for growth and the future housing needed, planning must be coordinated on multiple levels. On the state level, planning is guided by the goals of the GMA. The housing market is regional, so the GMA requires regional coordination with countywide planning policies. At the local level, the GMA also provides a framework for counties and individual cities to further address and plan for their local needs in coordination.

This guidance document will cover the countywide framework for planning for housing. It will include an overview of:

- The countywide planning policy requirements under the GMA which promote consistently and coordination at the county level,
- An overview of the framework for projecting future housing needs to plan for within comprehensive plans,
- The methodology for projecting these future housing needs, and
- Minimum requirements and recommendations for allocating housing needs by income band to each jurisdiction to plan for within their individual comprehensive plan.

**GMA housing goal**

In 2021, the Legislature changed the GMA housing goal from "encourage the availability of affordable housing" to "plan for and accommodate affordable housing." This change, one of the first changes to GMA goals since the adoption of the GMA, directs local governments to take more action to plan for their housing needs.

The housing goal now reads: "plan for and accommodate housing affordable to all economic segments of the population of this state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock." (RCW 36.70A.020)

The subsequent "Guidance for Updating a Housing Element" (Book 2) and "Guidance for Addressing Racially Disparate Impacts" (Book 3) will cover the individual jurisdictional requirements for housing planning under the GMA.

# Countywide planning policies

The GMA includes a requirement that fully planning counties and their cities develop countywide planning policies (CPPs) to promote coordination and consistency for items of regional importance within the county (see Exhibit 1 below). RCW 36.70A.210 requires CPPs that address:

- Designating urban growth areas (UGAs) per RCW 36.70A.110;
- Promoting contiguous and orderly development and providing urban services to such development;
- Siting public capital facilities of a countywide or statewide nature, including transportation facilities of statewide significance as defined in RCW 47.06.140;
- Planning for countywide transportation facilities and strategies;
- **Considering the need for affordable housing, such as housing for all economic segments of the population and parameters for its distribution;**
- Joint county and city planning within urban growth areas;

- Countywide economic development and employment, which must include consideration of the future development of commercial and industrial facilities;
- Analysis of the fiscal impact; and
- Protecting tribal cultural resources in collaboration with federally recognized Indian tribes.

Many of the CPP topics directly or indirectly inform a coordinated county-city approach to housing including:

- Allocating population growth among cities, unincorporated urban growth areas and rural areas;
- Providing necessary infrastructure for housing (water, sewer, roads, etc.) and services to support residents (fire, school, parks, transit, etc.);
- Planning for a fair share of affordable housing (subsidized, permanent supportive housing, shelters) and their siting within the county;
- Joint planning for housing in unincorporated UGAs; and
- Supporting economic development with workforce housing.

This chapter provides an overview of the role of CPPs in preparing and updating housing elements, and in guiding collective strategies to achieve affordable housing. It is organized as follows:

- Coordinated housing planning under the GMA
- Updating countywide planning policies
- Example countywide planning policies for housing
- Regional housing studies and strategies

**Countywide planning policies must include** policies that consider the need for affordable housing, such as housing for all economic segments of the population and parameters for its distribution. (RCW 36.70A.210 (3)(e))

## Coordinated housing planning under the GMA

The GMA includes specific requirements for how cities and counties should plan for housing, including especially housing affordable to lower-income households. The requirements apply in the 28 "fully planning" counties that must plan under the GMA, those counties in dark blue, light blue and green in Exhibit 1. Implementation of the GMA is guided by 14 overlapping goals including a housing goal (see sidebar on the previous page).

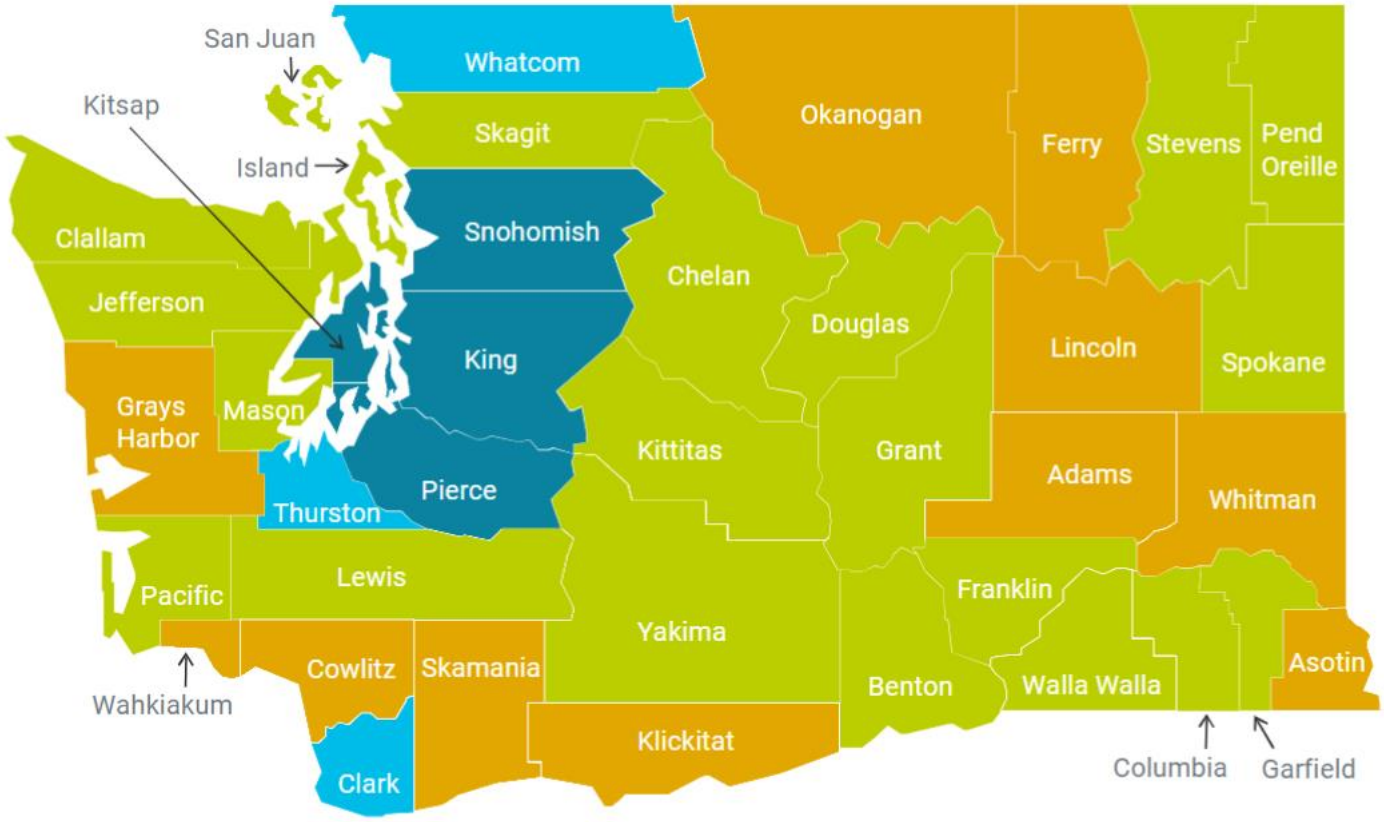
As housing is of a regional nature, CPPs are an important tool to coordinate local approaches. They should establish goals and policies that are consistent with the GMA housing goal, and provide a framework to address local and regional needs. The CPP policy topics must consider the need for affordable housing, for all economic segments and parameters for its distribution. Local goals and policies must be consistent with countywide planning policies.[6]

[6] See this case, Paul Stickney and Richard Birgh v. City of Sammamish, Case No. 15-3-0017, which addressed how local plans must be consistent with CPPs. Find this case by logging into https://eluho2022.my.site.com/casemanager/s/ and searching for the order.

The policies of city and county comprehensive plans in Kitsap, King, Pierce and Snohomish counties must also be consistent with the multicounty planning policies (MPPs) in Vision 2050 approved by the General Assembly of the Puget Sound Regional Council (PSRC) in October 2020. VISION 2050 includes a housing vision and housing goal, which reflect the GMA housing goal (see sidebar). The vision and goal emphasize a range of housing choices and affordability across income levels. The related housing policies also address health and safety, equity, preventing displacement, supporting ownership and public cooperation to provide housing for the most vulnerable (see Exhibit 2). Vision 2050 includes several actions for local jurisdictions: to conduct a housing needs analysis, to consider affordable housing incentives such as inclusionary and incentive zoning regulations, to assess displacement risk, and to update housing regulations to remove barriers to housing development.

**VISION 2050 housing goal:** "The region preserves, improves and expands its housing stock to provide a range of affordable, accessible, healthy and safe housing choices to every resident. The region continues to promote fair and equal access to housing for all people."

## Exhibit 1: "Fully planning" counties in Washington State




Fully planning jurisdictions are those in dark blue, light blue and green.

Source: Washington State Department of Commerce, 2022

## Exhibit 2. PSRC's VISION 2050 plan

"VISION 2050 calls for cities and counties to support the building of more diverse housing types, especially near transit, services, and jobs, to ensure all residents have the opportunity to live in thriving urban places. VISION 2050 also calls for more housing affordable to low- and very low-income households. It recognizes that providing long-term affordable housing for the region's most vulnerable residents requires public intervention through funding, collaboration, and jurisdictional action and cannot be met by market forces alone." (Vision 2050, page 88)

- MPP-H-1: Plan for housing supply, forms and densities to meet the region's current and projected needs consistent with the Regional Growth Strategy and to make significant progress towards jobs/housing balance.
- MPP-H-2: Provide a range of housing types and choices to meet the housing needs of all income levels and demographic groups within the region.
- MPP-H-3: Achieve and sustain – through preservation, rehabilitation and new development – a sufficient supply of housing to meet the needs of low-income, moderate-income, middle-income and special needs individuals and households that is equitably and rationally distributed throughout the region.
- MPP-H-4: Address the need for housing affordable to low- and very low-income households, recognizing that these critical needs will require significant public intervention through funding, collaboration and jurisdictional action.
- MPP-H-5: Promote homeownership opportunities for low-income, moderate-income, and middle-income families and individuals while recognizing historic inequities in access to homeownership opportunities for communities of color.
- MPP-H-6: Develop and provide a range of housing choices for workers at all income levels throughout the region that is accessible to job centers and attainable to workers at anticipated wages.
- MPP-H-7: Expand the supply and range of housing at densities to maximize the benefits of transit investments, including affordable units, in growth centers and station areas throughout the region.
- MPP-H-8: Promote the development and preservation of long-term affordable housing options in walking distance to transit by implementing zoning, regulations and incentives.
- MPP-H-9: Expand housing capacity for moderate density housing to bridge the gap between single-family and more intensive multifamily development and provide opportunities for more affordable ownership and rental housing that allows more people to live in neighborhoods across the region.
- MPP-H-10: Encourage jurisdictions to review and streamline development standards and regulations to advance their public benefit, provide flexibility and minimize additional costs to housing.
- MPP-H-11: Encourage inter-jurisdictional cooperative efforts and public-private partnerships to advance the provision of affordable and special needs housing.
- MPP-H-12: Identify potential physical, economic and cultural displacement of low-income households and marginalized populations that may result from planning, public investments, private redevelopment and market pressure. Use a range of strategies to mitigate displacement impacts to the extent feasible.

Source: PSRC, "Vision 2050," 2020. All policies above are direct quotes.

## Updating countywide planning policies

Each fully planning county has adopted countywide planning policies in cooperation with their cities. Typically, there is an inter-jurisdictional body that provides recommendations to the county legislative body, and a process by which the policies are reviewed and amended. For example, in some counties the interagency body provides recommendations to the county government. Some counties also have a ratification process where a number of cities representing a majority share of population must affirm the amendments prior to final approval by the county legislative body.

The original deadline for fully planning counties and cities to prepare CPPs was very early after the GMA was passed, as one of the first steps in implementing growth management (see RCW 36.70A.210). Most counties adopted policies in the mid-1990s, and have updated their policies at least once or more.

There is currently no recommendation to update countywide planning policies; however, it may be appropriate to review and revise CPPs periodically. This update could be after a new 20-year population forecast from the state Office of Financial Management (generally every five years, RCW 36.70A.040) or prior to a periodic review and update (RCW 36.70A.130), as appropriate.

For example, King County updated its CPPs to respond to OFM population allocations and to prepare for a periodic review due by 2024. As part of the process, King County and its cities considered the work and input from the counties Affordable Housing Committee and considered more local responsibility.

The King County process to update the CPPs regarding housing and other related growth management topics is illustrated in Exhibit 3.

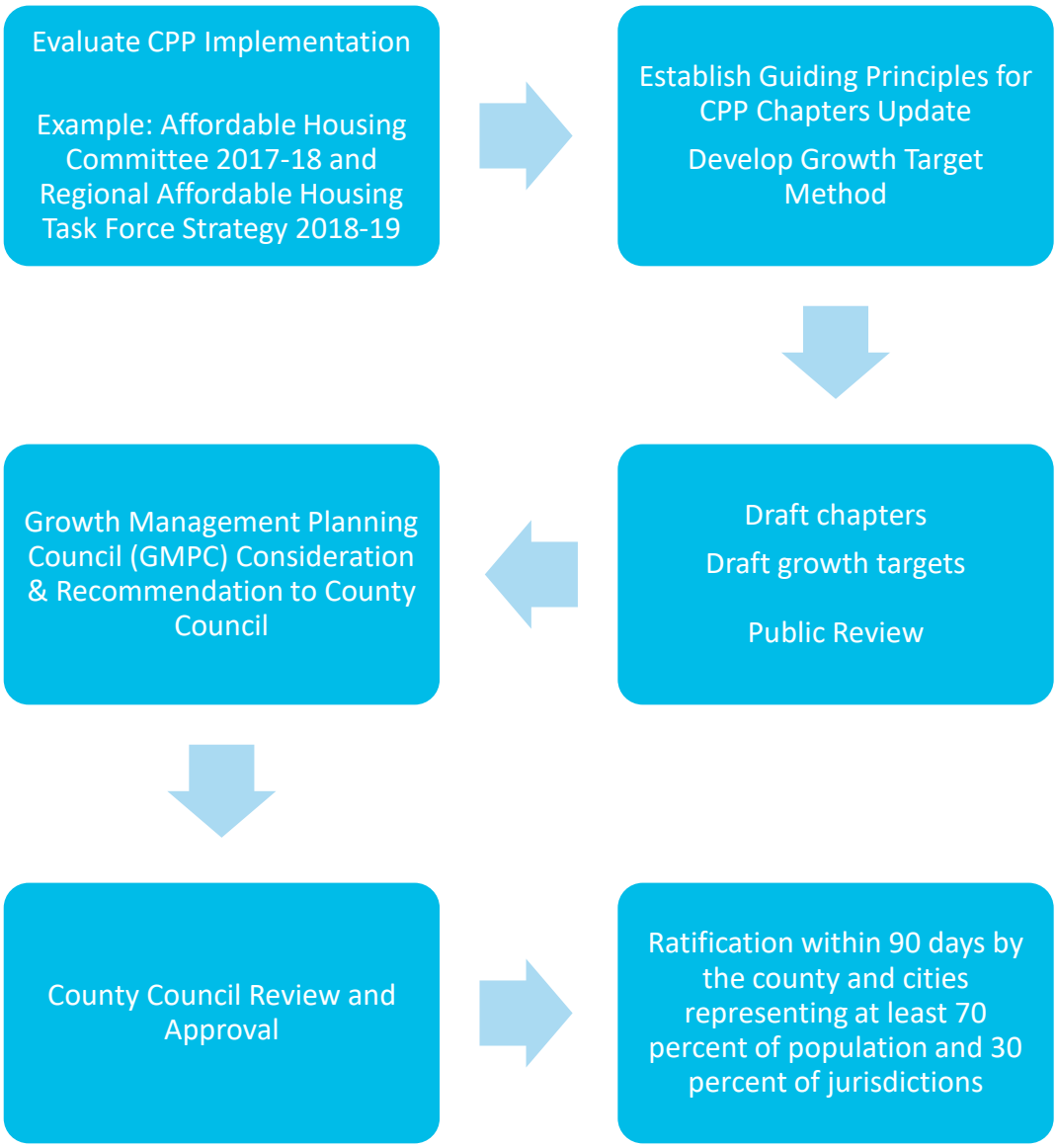
**COUNTY-CITY INTER-JURISDICTIONAL COORDINATION**

Each county and city that develops CPPs often works through existing cooperative bodies or specifies the formation of such a body in its CPPs or in other interlocal agreements. Two examples are described below.

**Snohomish County Tomorrow (SCT):** SCT began in March 1989 as a voluntary association of cities, towns, the county and the Tulalip Tribes. In July 1991, SCT agreed to use the SCT Goals as a basis for establishing the countywide planning policies required by RCW 36.70A.210. SCT has six committees that meet monthly. A full assembly of all the entities meets annually. Refinements and future amendments to CPPs involves one of the standing committees of SCT – usually, but not always, the Planning Advisory Committee (PAC) – to take the lead in formulating draft policy amendments to the Steering Committee. The Steering Committee then takes input and forwards its recommendation(s) to the county council. Finally, the council holds a public hearing and takes final action. A complete update of CPPs was accomplished in 2011 but there have been several amendments between 2011 and 2016.

**Kittitas County Conference of Governments (KCCOG):** This regional county-city body was organized under RCW 36.70.060. A primary duty at its founding in 1995 was to create the CPPs under GMA. The KCCOG also reviews population projections under GMA. A super majority vote is needed to decide issues of land use (60% of voting members representing 75% of population). The board meets monthly.

## Exhibit 3. King County CPP amendment process, 2021

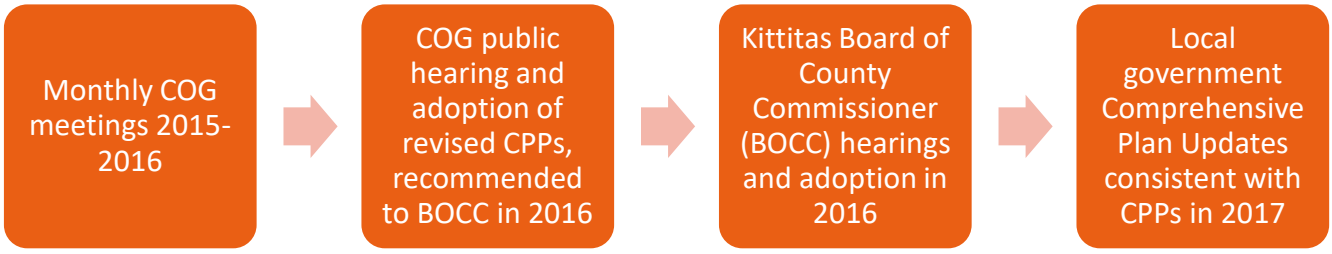



Source: https://kingcounty.gov/~/media/depts/executive/performance-strategy-budget/regional-planning/GrowthManagement/GMPCMeeting022620/GMPC_022620_CPPs.ashx?la=en

Other counties have similar procedures to amend their CPPs. Kittitas County's Conference of Governments (KCCOG), attended by elected officials from each city and the county, prepares policy amendments and approves them periodically. Since 1998, the CPPs had been lightly amended, but KCCOG conducted a thorough update of them in 2016 (Exhibit 4), ahead of the required periodic updates of county and city comprehensive plans, due in 2017.[7]

[7] Per KCCOG bylaws, a super majority vote is needed to decide issues of land use (60% of voting members representing 75% of population).

### Exhibit 4. Kittitas County Conference of Governments (COG) CPP amendment process, 2016




## Example countywide planning policies for housing

One key function of CPPs or MPPs should be to provide a coordinated framework that ensures regional housing needs, including needs among households of all income levels, are collectively addressed in local housing plans. In other words, the goals and targets in local housing plans should, in aggregate, collectively address needs for housing by type in the county or multi-county area. This is because housing is a regional issue, and should be addressed at a regional level. Different counties and metropolitan regions have taken different approaches to creating this framework.

This section presents example policies in the following order, from most common to least common:

- Affordable Housing: "Policies that consider the need for affordable housing…" (RCW 36.70A.210(3)(e))
- Growth Target Allocation and Monitoring: Policies to implement urban growth areas (RCWs 36.70A.210(3)(a) and 36.70A.110) including specific policies regarding growth target allocations[8]
- Fair Share Affordable Housing: "… housing for all economic segments of the population and parameters for its distribution." (RCW 36.70A.210(3)(e))

In addition to these example countywide planning policies, Appendix A: Countywide planning policies to support housing includes additional countywide planning policy examples grouped by topic.

### Affordable housing policies

CPPs guide each community's housing element, and vary in their detail, including listing housing types or regulatory techniques to address housing affordability. See examples in Exhibit 5.

### Exhibit 5. Examples of countywide policies regarding affordable housing

| County | Affordable housing policy text quote |
|---|---|
| **Spokane County** | 4. Each jurisdiction's development policies, regulations and standards should provide for the opportunity to create affordable housing in its community, such policies may include regulatory tools, such as inclusionary zoning, performance/impact zoning, mixed-use development and incentives for increasing density to promote greater choice and affordable housing. |

[8] A few counties and cities ratify growth targets in their CPPs, though most counties adopt growth targets in other formats outside their CPPs following inter-jurisdictional coordination.

| County | Affordable housing policy text quote |
|---|---|
| | 6. In conjunction with other policy topics, coordinate housing, transportation, and economic development strategies to ensure that sufficient land and densities for affordable housing are provided in locations readily accessible to employment centers. |
| **Snohomish County** | HO-1. The county and cities shall make provisions in their comprehensive plans to accommodate existing and projected housing needs, consistent with the Regional Growth Strategy and Snohomish County Growth Targets. Plans must include a specific assessment of housing needs by economic segment, as described in the housing report prescribed in CPP HO-5. Those provisions should consider the following strategies:<br>• Avoid further concentrations of low-income and special needs housing.<br>• Increase opportunities and capacity for affordable housing in Regional, Countywide, and local growth centers.<br>• Increase opportunities and capacity for affordable housing close to employment, education, shopping, public services, and public transit.<br>• Increase opportunities and capacity for affordable and special needs housing in areas where affordable housing is currently lacking.<br>• Support affordable housing opportunities in other Snohomish County jurisdictions, as described below in CPP HO-3.<br>• Support the creation of additional housing options in single-family neighborhoods to provide for more diverse housing types and choices to meet the various needs of all economic segments of the population. |
| **Clark County** | 2.1.7. Encourage flexible and cost efficient land use regulations that allow for the creation of alternative housing types which will meet the needs of an economically diverse population. |
| **Walla Walla County** | 8.5. The housing and land use elements of the local comprehensive plans will include an assessment of land availability and general criteria for siting special purpose housing within the UGA to ensure that such housing can be accommodated. The assessment should include the extent to which demands from all segments will be met.<br><br>8.6. Special purpose housing should include, but not be limited to, migrant farm worker housing and homeless shelters, as well as transitional and/or group homes for the developmentally or mentally disabled, recovering chemically dependent persons and the chronic mentally ill. |
| **Whatcom County** | 5. The county and the cities shall review existing regulations and policies that exclude or discourage affordable housing in their communities and shall not adopt regulations and policies which do so. Mobile, modular, and manufactured homes on individual lots, mobile home parks, accessory units, inclusionary zoning, mixed use, and increased densities shall be reviewed as affordable housing alternatives.<br><br>7. Low income housing shall not be concentrated in only a few communities or neighborhoods.<br><br>8. The county and the cities shall consider reducing impact and/or mitigation fees for affordable housing provided in a proposed development. |

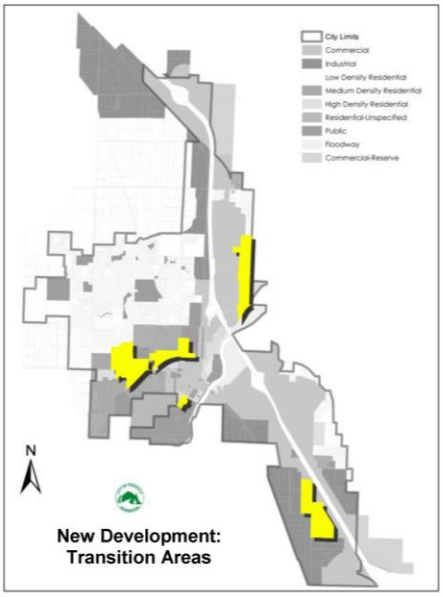
Source: BERK review of CPPs in Washington State, October 2020. Updated June 2023 by Commerce.

CPPs lead to more detailed locally developed policies by individual cities. For example, consistent with Whatcom County CPPs, the City of Ferndale adopted a housing element that identified a range of housing types by neighborhood. See example in Exhibit 6.

## Exhibit 6. Ferndale housing element excerpt

**CHAPTER 3: HOUSING ELEMENT**
**FERNDALE COMPREHENSIVE PLAN**

**NEW DEVELOPMENT – TRANSITION AREAS (PORTAL WAY, LABOUNTY, WEST MAIN):**




Properties along Portal Way, LaBounty Drive and Main Street west of Washington Avenue have been designated for high density residential uses that may be used as a buffer or transition area between single family and mixed use or commercial development. In addition to duplexes, cottage housing and mixed-density Planned Unit Developments which are shared between single family and transition areas, the following housing forms will likely be the dominant type of development in these areas (though they may not be applicable to all zones):

Source: City of Ferndale, 2016, p. 37

Ferndale also adopted policies that are consistent with CPPs about housing types and locations, such as:

- "Allow for alternative high density developments in multifamily zoning that allow for owner-occupied units, zero lot line development, duplex divisions and more."
- "Consider amending development regulations to consider the overall cost of residential occupancy, including additional costs associated with inefficient design, access to transportation (including transit), access to recreational opportunities, access to schools and access to employment opportunities."[9]

## Growth target allocation and monitoring policies

Most CPPs give guidance to how growth should be allocated across jurisdictions. Targets themselves are often adopted outside the CPPs. Commerce recommends jurisdictions include factors to be considered in allocation including jobs/housing balance, availability of infrastructure such as sewer and water, public transit, social services and capacity for growth. For selected examples, see Exhibit 7. Cities then implement the targets in their land use and housing elements.

[9] City of Ferndale, https://www.cityofferndale.org/wp-content/uploads/2017/12/Chapter-III-Housing.pdf, 2016, p. 52

## Exhibit 7. Growth target allocation and monitoring

| County | Growth target allocation and monitoring policy quote text |
|---|---|
| **Benton County** | **Policy #2:** The County shall allocate future projected populations through the use of the latest population projections published by the Washington State Office of Financial Management (OFM). Allocation of future populations shall be based on the following distribution:<br>• City of Kennewick 40% of total county population;<br>• City of Richland 28% of total county population;<br>• Benton County 19% of total county population;<br>• City of West Richland 8% of total county population;<br>• City of Prosser 3% of total county population and<br>• City of Benton City 2% of total county population.<br><br>The County, in consultation with the Cities, will review the OFM population projection ranges (Low, Medium and High) and allocation percentages whenever OFM publishes new GMA population projections. |
| **King County** | **Development Patterns-11:** GMPC [Growth Management Planning Council] shall allocate residential and employment growth to each city and unincorporated urban area in the county. This allocation is predicated on:<br>• Accommodating the most recent 20-year population projection from the state Office of Financial Management and the most recent 20-year regional employment forecast from the Puget Sound Regional Council, informed by the 20-year projection of housing units from the state Department of Commerce;<br>• Planning for a pattern of growth that is consistent with the Regional Growth Strategy including focused growth within cities and Potential Annexation Areas with designated centers and within high-capacity transit station areas, limited development in the Rural Area, and protection of designated Resource Lands;<br>• Efficiently using existing zoned and future planned development capacity as well as the capacity of existing and planned infrastructure, including sewer, water, and stormwater systems;<br>• Promoting a land use pattern that can be served by a connected network of public transportation services and facilities and pedestrian and bicycle infrastructure and amenities;<br>• Improving jobs/housing balance consistent with the Regional Growth Strategy, both between counties in the region and within subareas in the county;<br>• Promoting opportunities for housing and employment throughout the Urban Growth Area and within all jurisdictions in a manner that ensures racial and social equity;<br>• Allocating growth to Potential Annexation Areas within the urban unincorporated area proportionate to their share of unincorporated capacity for housing and employment growth.<br><br>**Development Patterns-12:** The GMPC shall:<br>• Update housing and employment targets periodically to provide jurisdictions with up-to-date growth allocations to be used as the land use assumption in state-mandated comprehensive plan updates;<br>• Adopt housing and employment growth targets in the Countywide Planning Policies pursuant to the procedure described in policy FW-1;<br>• Create a coordinated countywide process to reconcile and set growth targets that implements the Regional Growth Strategy through countywide shares of regional housing and jobs, allocations to Regional Geographies, and individual jurisdictional growth targets;<br>• Ensure that each jurisdiction's growth targets are commensurate with their role in the Regional Growth Strategy by establishing a set of objective criteria and principles to guide how jurisdictional targets are determined;<br>• Ensure that each jurisdiction's growth targets allow it to meet the need for affordable housing for households with low-, very low-, and extremely low-incomes; and<br>• Adjust targets administratively upon annexation of unincorporated Potential Annexation Areas by cities. Growth targets for the planning period are shown in Table DP-1. *[Table contains detailed growth allocations.]* |

Source: BERK review of CPPs in Washington State, October 2020. Updated June 2023 by Commerce.

## Fair share affordable housing policies

Each county has taken a different approach in developing policies that address affordable housing and parameters for its distribution. Most focus on guiding planning for affordable housing including housing supply, housing variety and type of housing in urban areas. Fewer identify a policy for determining each jurisdiction's fair share contribution to regional affordable housing needs. "Fair share" means that a county has determined the need for housing at various affordability levels and has allocated that across the jurisdictions with a coordinated approach (see Exhibit 8).

### Exhibit 8. Example fair share policies in countywide planning policies

| County | Fair share policy quote text | Fair share allocation method |
|---|---|---|
| **Jefferson County** | 6. Each UGA shall accommodate its fair share of housing affordable to low and moderate-income households according to its percentage share of the county population and by promoting a balanced mix of diverse housing types. | There are two UGAs, the City of Port Townsend (36% of allocated population), and the unincorporated Port Hadlock-Irondale UGA (21%). |
| **Thurston County** | 8.4. Establish and maintain a process to accomplish a fair share distribution of affordable housing among the jurisdictions. | Regional Housing Plan, Final December 2013, Appendix Table 2.1: Fair Share Distribution of Renter- and Owner-Occupied Housing in Thurston County.<br><br>Allocated to each city and county based on cost-burdened households, adjusted for transportation costs and accessibility to low-wage jobs. |
| **King County** | **H-1.** All comprehensive plans in King County combine to address the countywide need for housing affordable to households with low-, very low-, and extremely low-incomes, including those with special needs, at a level that calibrates with the jurisdiction's identified affordability gap for those households and results in the combined comprehensive plans in King County meeting countywide need. The countywide need for housing in 2044 by percentage of AMI is:<br><br>• 30 percent and below AMI (extremely low): 15 percent of total housing supply<br>• 31-50 percent of AMI (very low): 15 percent of total housing supply<br>• 51-80 percent of AMI (low): 19 percent of total housing supply<br><br>Table H-1 (page 38) provides additional context on the countywide need for housing.<br><br>**H-2.** Prioritize the need for housing affordable to households at or below 30 percent AMI (extremely low-income) by implementing tools such as:<br><br>• Increasing capital, operations, and maintenance funding;<br>• Adopting complementary land use regulations;<br>• Fostering welcoming communities, including people with behavioral health needs;<br>• Adopting supportive policies; and<br>• Supporting collaborative actions by all jurisdictions. | "Building on the [Affordable Housing] Task Force's work, this [CPP] chapter establishes a countywide need for affordable housing defined as the additional housing units needed in King County by 2044 so that no household at or below 80 percent of Area Median Income (AMI) is housing cost burdened. While the need is expressed in countywide terms, housing affordability varies significantly across jurisdictions.<br><br>In addressing housing needs, less affordable jurisdictions will need to take significant action to increase affordability across all income levels while more affordable jurisdictions will need to take significant action to preserve affordability. To succeed, all communities must address housing need where it is greatest - housing affordable to extremely low-income households.<br><br>When taken together, all the comprehensive plans of King County jurisdictions must "plan for and accommodate" the existing and projected housing needs of the county (RCW 36.70A.020 and 36.70A.070). … These policies guide jurisdictions through a four-step process: 1. Conduct a housing inventory and analysis; 2. Implement policies and strategies to meet housing needs equitably; 3. Measure results and provide accountability; and 4. Adjust strategies to meet housing needs." |

| County | Fair share policy quote text | Fair share allocation method |
|---|---|---|
| **Snohomish County** | **HO-2.** County and city comprehensive plans shall include policies to meet affordable housing goals consistent with VISION 2050. Jurisdictions should demonstrate within their land use and housing elements that they can accommodate needed housing consistent with the Regional Growth Strategy and Snohomish County Growth Targets. These efforts should include facilitating the regional fair share of affordable housing for very low, low, moderate, and middle-income households and special needs individuals. Housing elements of comprehensive plans shall be periodically evaluated for success in facilitating needed housing.<br><br>**HO-5.** The cities and the county shall collaborate to report housing characteristics and needs in a timely manner for jurisdictions to conduct major comprehensive plan updates and to assess progress toward achieving CPPs on housing. The report shall be sufficiently easy to understand and use for planning and evaluation. To the extent made possible by the availability of valid data, this report shall, for the entire county and each jurisdiction<br><br>a. Describe the measures that jurisdictions have taken (individually or collectively) to implement or support CPPs on housing, especially … to support housing affordability.<br><br>b. Quantify and map existing characteristics... on housing…<br><br>c. Identify the number of housing units necessary to meet the various housing needs for the projected population of households of all incomes and special needs populations. The number of units identified for each jurisdiction will be utilized for planning purposes and to acknowledge the responsibility of all jurisdictions to plan for affordable housing within the regional context<br><br>d. Evaluate the risk of physical and economic displacement of residents, especially low-income households and marginalized populations. . | Requires each local government to evaluate their need and plan individually and collectively to facilitate the regional fair share of housing. |

Source: BERK review of CPPs in Washington State, October 2020. Updated June 2023 by Commerce.

As an example of implementation, the City of Wenatchee has adopted the following policy regarding its fair share of housing affordable to low and moderate-income households:

- Coordination, Policy 4: "Coordinate with regional agencies to stay abreast of and share in the responsibility for achieving a reasonable and equitable distribution of affordable housing to meet the needs of middle and lower income persons."[10]

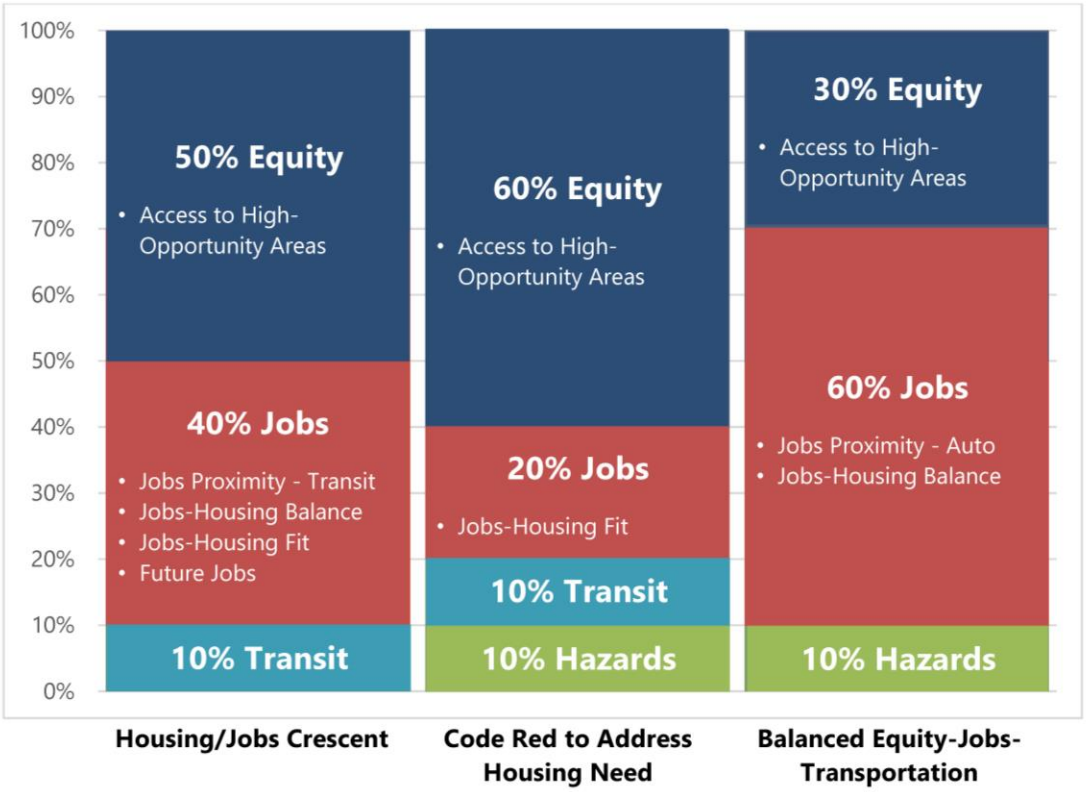
**Example of planning for all housing needs: California, Bay Area**
Since 1969, California law requires cities, towns and counties to plan for housing needs, regardless of income. A regional housing needs allocation is prepared every eight years by the California Department of Housing and Community Development. Each region then allocates the need for housing at all income levels to individual local governments. A new allocation was developed for 2022-2030.

For example, the Association of Bay Area Governments (ABAG), a Metropolitan Planning Organization (MPO), is developing a methodology to allocate each jurisdiction's fair share of the regional allocation in a multi-county area of the San Francisco Bay Area (see Exhibit 9). In the spring of 2020, several methodologies were developed to consider how to allocate affordable housing, balancing different considerations. Factors include:

- Equity - access to high opportunity areas
- Jobs - jobs/housing balance, jobs-housing fit[11]
- Transit - proximity
- Hazards - consideration of natural hazards

[10] Planning to Blossom 2037: Wenatchee Urban Area Comprehensive Plan
[11] Jobs-housing fit refers to the "extent to which locally available housing fits the ability of locally employed workers to afford it." See https://www.americanprogress.org/issues/economy/reports/2020/08/10/488313/expanding-supply-affordable-housing-low-wage-workers/, by Michela Zonta, dated August 10, 2020.

## Exhibit 9. Association of Bay Area Governments (ABAG) regional housing needs allocation factors and weights method options, spring 2020




Source: https://abag.ca.gov/sites/default/files/hmc_rhna_methodology_update_april2020.pdf

In the fall of 2020, the region's Housing Methodology Committee developed six methods and screened them according to criteria including:

- **Objective 1:** Does the allocation increase the housing supply and the mix of housing types, tenure and affordability in all cities and counties within the region in an equitable manner?
- **Objective 2:** Does the allocation promote infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns and the achievement of the region's greenhouse gas reductions targets?
- **Objective 3:** Does the allocation promote an improved intraregional relationship between jobs and housing, including an improved balance between the number of low-wage jobs and the number of housing units affordable to low wage workers in each jurisdiction?
- **Objective 4:** Does the allocation direct a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category?
- **Objective 5:** Does the allocation affirmatively further fair housing?[12]

A final allocation was approved by the region after consideration of these recommendations.[13]

---

[12] ABAG describes " affirmatively further fair housing" as focusing "on overcoming patterns of segregation and fostering inclusive communities."

[13] The final allocation method determined by ABAG is found starting on page 15 of the Final Regional Housing Needs Allocation (RHNA) Plan (Dec 2021, updated No 2022): https://abag.ca.gov/sites/default/files/documents/2022-12/Final%20RHNA%20Methodology%20Report%202023-2031_update_11-22.pdf.

A critique of California's regional housing needs allocation process cited lack of local government implementation of policies that increase housing supply and diversity and corresponding lack of enforcement by the state.[14] In 2021, the state implemented enforcement measures for these goals through a new Housing Accountability Unit.[15] Oregon's statewide housing policy requires implementation include a continuous review of housing need projections and a process for accommodating those needed revisions.[16]

## Regional housing studies and strategies

Many housing issues cross boundaries and strategies of one community may influence another. Regional housing studies can form the basis for coordinated housing policies and strategies. Coordinating across communities can build understanding of the region's housing market and leverage resources to achieve regional housing strategies that more fully address needs than any jurisdiction can do on their own. Example efforts and strategies across Washington state include, but are not limited to:

- Chelan Valley Housing Needs Assessment, 2018, resulting in Chelan Valley Housing Trust
- King County Regional Affordable Housing Task Force, Final Report and Recommendations for King County, WA, 2019
- Puget Sound Regional Council, Regional Housing Needs Assessment and Regional Housing Strategy, 2021
- Snohomish County Housing Affordability Regional Taskforce (HART), 2019
- South King County Housing and Homelessness Partners (SKHHP)
- Walla Walla Regional Housing Action Plan, 2021
- Lacey, Olympia, Tumwater Regional Housing Action Plan, 2021

# Relevant requirements under GMA

In 2021, the Washington Legislature changed the way communities are required to plan for housing. House Bill 1220 (HB 1220, laws of 2021)[17] amended the GMA goals so that local governments must "plan for and accommodate housing affordable to all economic segments of the population of the state." It also updated the requirements for comprehensive plan housing elements in RCW 36.70A.070(2). State law now requires Commerce to project housing needs including "units for moderate, low, very low and extremely low-income households and emergency housing, emergency shelters and permanent supportive housing."

RCW 36.70A.030 provides definitions for households by income level relative to "median household income adjusted for household size, for the county where the household is located, as reported by the United States department of housing and urban development." The U.S. Department of Housing and Urban Development (HUD) publishes this information as the Median Family Income, also known as Area Median Income (AMI), for each county annually.[18] Exhibit 10 presents the definitions for each income level as stated in RCW 36.70A.030.

---

[14] See Bromfield et al, 2017: https://medium.com/the-block-project/ensuring-fair-shares-of-housing-across-local-jurisdictions-324b5f525054.
[15] Tobias, Manuela, in CalMatters. "California is increasing enforcement of its housing goals: will it work?" Published October 18, 2021. https://calmatters.org/housing/2021/10/california-housing-podcast-enforcement/
[16] Oregon Department of Land and Conservation and Development, Oregon's Statewide Planning Goals & Guidelines: Goal 10: Housing
[17] https://lawfilesext.leg.wa.gov/biennium/2021-22/Pdf/Bills/Session%20Laws/House/1220-S2.SL.pdf?q=20230512102905
[18] To find your local county AMI, go to HUD's Dataset on Income Limits, scroll down and click the red box titled "Click Here for FY 2023 IL Documentation" and select the state and county for which you are looking for data. https://www.huduser.gov/portal/datasets/il.html

## Exhibit 10. Income level definitions in RCW 36.70A.030

| Household income segment | Income relative to AMI |
|---|---|
| Extremely Low-Income | 0-30% of AMI |
| Very Low-Income | >30-50% of AMI |
| Low-Income | >50-80% of AMI |
| Moderate Income | >80-120% of AMI |

Exhibit 11 provides definitions for other housing types called out in RCW 36.70A.070(2)(a) for permanent supportive and emergency housing needs projections.

## Exhibit 11. Definitions for permanent supportive and emergency housing types

| Housing type | Definition from RCW 36.70A.030 |
|---|---|
| Permanent Supportive Housing (PSH) | Subsidized, leased housing with no limit on length of stay that prioritizes people who need comprehensive support services to retain tenancy and utilizes admissions practices designed to use lower barriers to entry than would be typical for other subsidized or unsubsidized rental housing, especially related to rental history, criminal history, and personal behaviors. Permanent supportive housing is paired with on-site or off-site voluntary services designed to support a person living with a complex and disabling behavioral health or physical health condition who was experiencing homelessness or was at imminent risk of homelessness prior to moving into housing to retain their housing and be a successful tenant in a housing arrangement, improve the resident's health status, and connect the resident of the housing with community-based health care, treatment, or employment services. |
| Emergency Housing | Temporary indoor accommodations for individuals or families who are homeless or at imminent risk of becoming homeless that is intended to address the basic health, food, clothing, and personal hygiene needs of individuals or families. Emergency housing may or may not require occupants to enter into a lease or an occupancy agreement. |
| Emergency Shelters | A facility that provides a temporary shelter for individuals or families who are currently homeless. Emergency shelter may not require occupants to enter into a lease or an occupancy agreement. Emergency shelter facilities may include day and warming centers that do not provide overnight accommodations. |

There are two important features of the permanent supportive and emergency housing definitions in RCW 36.70A.030 that should be noted for projection efforts. First, the definition of permanent supportive housing (PSH) includes those who are at-risk of homelessness. This definition includes more people than HUD, which generally requires chronic homeless status for PSH units.[19]

Second, both emergency housing and emergency shelter include temporary accommodations. In implementation, there may be overlap between what could be considered emergency housing versus emergency shelter. For this reason, emergency housing and emergency shelter will be projected as a single category and referred to throughout this guidance as “emergency housing.” While the emergency shelter definition includes facilities such as warming and day centers, these services generally do not provide overnight accommodations. When accounting for current emergency housing inventory in communities, this analysis did not consider day centers or other programs without a place to sleep to be counted as beds or units in the projections. Additionally, Commerce guidance requires that emergency housing capacity for projected housing needs provide overnight accommodations. For both PSH and emergency housing types,

[19] One example of PSH may include housing provided through Apple Health for low-income people with disabilities.

implementation would need to follow the established eligibility criteria of funding streams being used to support the housing.

While the changes to the housing element requirements in 2021 strengthened the housing goal and added greater specificity to the comprehensive planning requirements, it did not change the fundamental way in which communities plan under GMA. Counties and cities must still plan for and accommodate sufficient housing within their jurisdiction. However, now they must also plan for and accommodate the categories of housing needs outlined above. This means they must show that they have adequate capacity at appropriate levels of density as well as policies and regulations in place to support and enable housing production affordable at each income level, including those that are below market rate. See Commerce's guidance on land capacity and adequate provisions in the "Guidance for Updating Your Housing Element" (2023) document for more details about these requirements and recommendations.

While the changes to RCW 36.70A.070(2) did make changes to plan for and accommodate housing affordable to all income housing needs, **it did not extend the requirement for jurisdictions to build the housing or guarantee the construction of housing for each category of need**.[20]

# Projected housing needs

As called for in the RCW 36.70A.070(2), Commerce has produced projections of countywide housing needs for all counties in Washington state. These county-level projections are based on the Washington State Office of Financial Management's (OFM) 2022 GMA population projections.

## Format of housing needs projections

While the GMA requires that Commerce provide housing needs projections by income level and for PSH, emergency housing and emergency shelters, it does not specify the geographic scale of those projections. Commerce is following the established regional planning process by which the state provides a range of countywide population projections, the county selects a population projection from the provided ranges, and then counties and local jurisdictions coordinate and allocate that projection to localities.

As indicated in RCW 36.70A.110 and RCW 36.70A.115, county officials are responsible for selecting a 20-year GMA population growth target that is within the Low- and High-growth projections prepared by the Washington State Office of Financial Management (OFM). Every five years, OFM releases GMA population projections for each county in Washington state in three different projection series: Low, Medium and High. Most counties and cities have already established their own frameworks for adopting countywide population projections and allocating the projections down to local jurisdictions as targets. These targets may or may not be included in CPPs. These jurisdictions, in turn, use the population targets in their comprehensive plans. This local allocation process allows each county to use their local understanding of each jurisdiction's local capacity, infrastructure, jobs, transportation, environmental constraints and other factors to allocate growth.

To maintain consistency with this established framework under GMA, Commerce produced housing needs projections for each county. These projections will build on, and maintain consistency with, OFM's GMA population projections. The methodology accounts for both current and projected housing needs by income level.

[20] New housing development involves many actors, not all of which are under the control of local jurisdictions.

These housing needs projections are published in the form of a spreadsheet tool that allows the user to enter a specific countywide population target and projection year. Then the tool returns customized projections of total and net new housing units needed to accommodate the entire population in the projection year by affordability level, including PSH and emergency housing. Additionally, this tool will provide data estimating the baseline (2020) housing inventory in each county by affordability level, PSH and emergency housing.

Exhibit 12 shows an example of the format of Commerce's projection data. The moderate-income household category has been split into two subcategories: >80-100% AMI and >100-120% AMI. While jurisdictions are only required to plan for moderate-income housing as a single category (>80-120% AMI), some jurisdictions may wish to look at both income levels separately when developing strategies for addressing housing needs. Additionally, the 0-30% AMI housing needs have been split into two categories: PSH and Non-PSH. This separation is because a portion of the 0-30% AMI housing needs are projected to also need permanent supportive services. The "0-30% AMI Non-PSH" category simply refers to extremely low-income housing needs without supportive services.

Finally, while the new housing element requirements include no requirements to inventory projected housing needs for above moderate-income households, Commerce accounts for projected needs for households at >120% AMI because jurisdictions still need to plan for and accommodate all housing needs. This also ensures the projections by income level sum to the total projected housing needs.

In the example shown in Exhibit 12, the projection year is 2045. Commerce projects housing needs out to 2050, consistent with the horizon year of OFM population projections. Commerce also provides interim projections for the years 2044, 2045, 2046 and 2047 to accommodate the various horizon years for county comprehensive planning cycles.

## Exhibit 12. Example format of Commerce housing needs projection data

| | Affordability Level (% of Area Median Income) | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| | | 0-30% | | | | | | | Emergency Housing/ Shelter Beds |
| | Total | Non-PSH | PSH | 30-50% | 50-80% | 80-100% | 100-120% | 120%+ | |
| Total Future Housing Needed (2045) | 171,754 | 17,122 | 3,007 | 20,677 | 45,221 | 29,834 | 18,844 | 37,050 | 1,864 |
| Estimated Housing Supply (2020) | 120,334 | 2,947 | 112 | 12,428 | 38,356 | 26,452 | 15,518 | 24,522 | 626 |
| Net New Housing Needed (2020-2045) | 51,420 | 14,175 | 2,895 | 8,249 | 6,866 | 3,382 | 3,326 | 12,528 | 1,238 |

Note: PSH = Permanent Supportive Housing

**Interpreting housing needs by income level**

Commerce's housing needs projections include needs broken down by income level. In many counties, these projections show relatively modest needs for moderate-income households and a larger amount of need at the lowest income levels. However, these projections for each income level assume success at meeting the housing needs of households at lower income levels. For example, in Exhibit 12, the county needs 6,866 net new units for households at 50-80% of AMI.

However, this assumes that all housing needs for households at 0-30% AMI and 30-50% AMI are met. If the over 25,000 units needed at those two income levels combined (i.e., 0-30% AMI and 30-50% AMI) are not produced, then households with incomes less than 50% AMI would be forced to occupy more expensive units at the 50-80% AMI level or above. As a result, there would be a shortage of 0-80% AMI units compared to the cumulative need at those income levels. Therefore, counties may wish to consider cumulative housing needs below each level of AMI to ensure they are adequately planning to meet housing needs.

**Data sources for estimating 2020 housing supply by affordability level**

Commerce's projections include a summary of the 2020 housing supply by affordability level. Additionally, the allocation Method B uses city level data on housing supply by affordability level. The primary data source used to develop these estimates is HUD Comprehensive Housing Affordability Strategy (CHAS) data, which is based on Census American Community Survey (ACS) 5-year estimates for 2014-2018. This was supplemented by analysis of Census Public Use Microsample (PUMS) data for the same timeframe.

The affordability of rental units and owner-occupied units was evaluated differently, as follows.

- **Renter-occupied units**: CHAS data classifies rental units by affordability level. However, it groups all rental units that are affordable to households above 80% of AM. Therefore, Commerce conducted analysis of PUMS data to estimate the percent of these units affordable to households in these categories: >80-100% AMI; >100-120% AMI; >120% AMI.

- **Owner-occupied units**: CHAS data includes a field called VHUD which estimates the affordability level of the home to a new buyer based on present home value and assumptions about income needed to afford a standard mortgage. We use this field to classify owner-occupied homes into affordability levels based on the assumption that over the course of the 20-year planning period most, if not all, units will be sold to new owners. CHAS data groups all owner-occupied homes affordable below 50% AMI. This analysis assumes all units in this category will be affordable to households with incomes of >30-50% AMI.

  Additionally, CHAS groups all owner-occupied homes affordable above 100% of AMI. Additional PUMS data was analyzed to estimate the percent of these units that are affordable to households with incomes of >100-120% AMI and >120% AMI.

Finally, the analysis determines the distribution of the 2018 housing stock by affordability level. We then apply these percentages to the estimated 2020 housing supply.

## Accessing housing needs projection data

Commerce developed an interactive spreadsheet tool for providing customized housing need projections called the Housing for All Planning Tool or HAPT.[21] This tool provides customized countywide housing needs projections by income level, PSH and emergency housing, and also supports the process of allocating those housing needs to individual jurisdictions.

**Data available from Commerce**

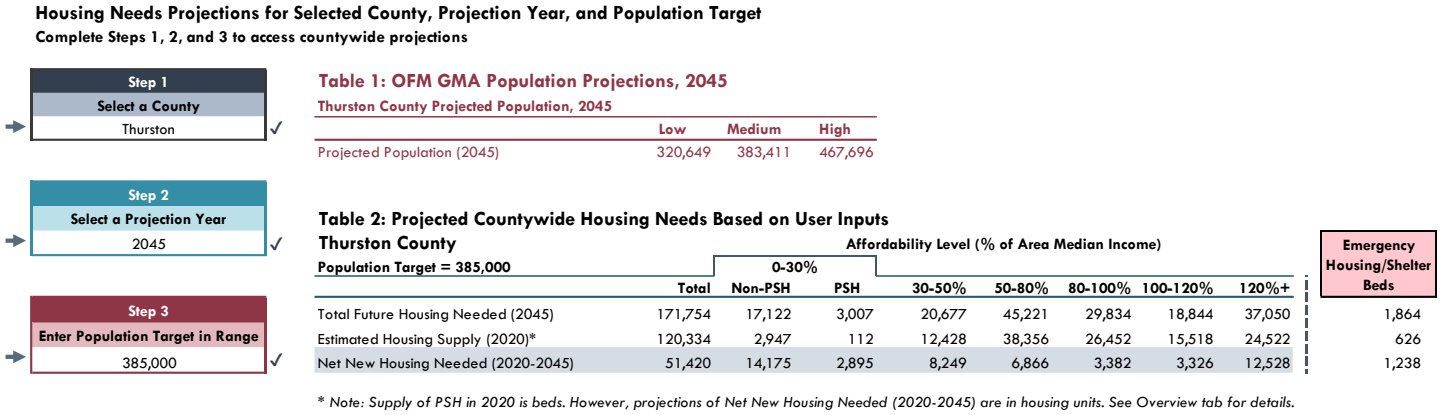
Data about projected housing needs for every county in Washington is available in Commerce's Housing for All Planning Tool (HAPT). Find it here: Updating GMA Housing Elements.

Exhibit 13 is a screenshot of the spreadsheet tool with example user selections for Thurston County. There are three steps to generating housing needs projections for a county of interest. After the user completes Step 1 (select the county) and Step 2 (select the projection year), the tool displays Table 1, the OFM population projection range for the selected county and year. For Puget Sound Regional Council (PSRC) counties, Table 1 will also include applicable VISION 2050 population projections when the projection year 2044 is selected.

[21] https://deptofcommerce.box.com/s/48o8fzedzxnh63xth6aofi2jc2npcjoa

Next, the user can enter a customized population target within the OFM range. In this case the user entered a target slightly above OFM's Medium projection. Once the population target is entered, Table 2 appears with projected countywide housing needs aligned to that specific population target.

## Exhibit 13. Screenshot of the Housing for All Planning Tool (HAPT)



**Housing Needs Projections for Selected County, Projection Year, and Population Target**

**Complete Steps 1, 2, and 3 to access countywide projections**

**Step 1**
**Select a County**
Thurston ✓

**Step 2**
**Select a Projection Year**
2045 ✓

**Step 3**
**Enter Population Target in Range**
385,000 ✓

**Table 1: OFM GMA Population Projections, 2045**

**Thurston County Projected Population, 2045**

| | Low | Medium | High |
|---|---|---|---|
| Projected Population (2045) | 320,649 | 383,411 | 467,696 |

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

**Thurston County**
**Population Target = 385,000**

| | Total | Affordability Level (% of Area Median Income) 0-30% Non-PSH | 0-30% PSH | 30-50% | 50-80% | 80-100% | 100-120% | 120%+ | Emergency Housing/Shelter Beds |
|---|---|---|---|---|---|---|---|---|---|
| Total Future Housing Needed (2045) | 171,754 | 17,122 | 3,007 | 20,677 | 45,221 | 29,834 | 18,844 | 37,050 | 1,864 |
| Estimated Housing Supply (2020)* | 120,334 | 2,947 | 112 | 12,428 | 38,356 | 26,452 | 15,518 | 24,522 | 626 |
| Net New Housing Needed (2020-2045) | 51,420 | 14,175 | 2,895 | 8,249 | 6,866 | 3,382 | 3,326 | 12,528 | 1,238 |

** Note: Supply of PSH in 2020 is beds. However, projections of Net New Housing Needed (2020-2045) are in housing units. See Overview tab for details.*

Note: Example population target selected for illustration purposes only.

Additional information about this spreadsheet tool and how it can be used to support allocation of countywide housing needs is available in the "Allocating Projected Countywide Housing Needs" section of this guidance.

# Projected housing needs methodology

This section describes the data sources, assumptions and calculations used by Commerce to project the housing needs of the future population projected by OFM in each county in Washington State. This methodology has three main parts that are interrelated:

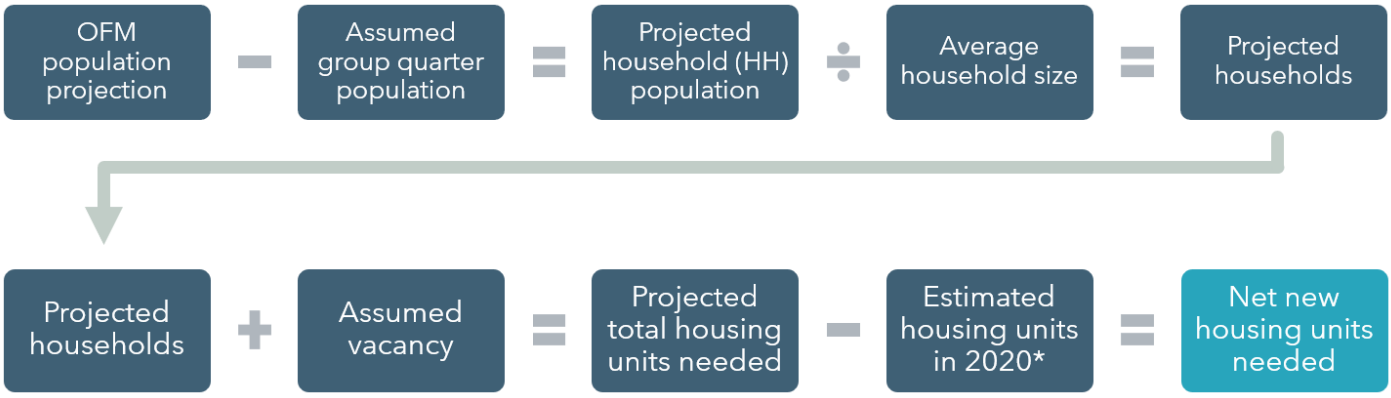
- Projecting total housing needs (all income levels)
- Distributing projected housing needs by income level
- Projecting emergency housing and PSH needs

The first part projects the total number of housing units needed to accommodate the total future population. It accounts for both unmet baseline needs as well as the needs to accommodate population growth projected by OFM. Next, we distribute these projected housing needs by income level with attention to baseline cost burdened households, homeless population and projected household growth. Finally, we project PSH and emergency housing needs. The following sections describe each part in more detail.

## Total projected housing needs

Exhibit 14 provides an overview of the methodology for calculating total projected housing needs. The following subsections describe the process in more detail.

## Exhibit 14. Methodology overview for calculating total projected housing needs




* Estimated housing units in 2020 are adjusted to remove homes estimated by the U.S. Census to be in recreational use (e.g., vacation homes or short-term rentals) or migrant worker housing. See the textbox on "Accounting for Vacation Homes and Migrant Worker Housing" below for more details.

## Projected household population

The first step to projecting future housing needs is to project future household population. Future household population is projected based on OFM population projections and Decennial Census data on group quarters population. Household population refers to individuals or groups of people who live together in housing units. However, not all residents live in housing units - some live in group quarters such as military barracks, assisted living communities, college dormitories or prisons. The projections assume that some percentage of the population will continue to live in group quarter arrangements at any given time. However, there is one category of group quarters population as reported by the Census that we assume are in need of permanent housing. The 2020 Census reported counts of people living in "Other Non-institutional Facilities." Much of this category consists of people experiencing homelessness living in shelters. For purposes of projecting future housing need, we assume that these residents will become part of the household population. In other words, we assume there should be enough housing units available to accommodate these residents in permanent housing.

This assumption does not mean that there will no longer be a need for emergency shelters or that homelessness will be ended. Nor does this represent a full count of the unhoused population. Rather, Commerce projections provide enough housing supply to accommodate residents of group quarters who are not in a long-term living arrangement and who should have access to a permanent housing unit. Emergency housing will still be necessary for temporary stays when individuals or families are experiencing a crisis situation and need shelter, but there should be enough housing available to get these people back into permanent housing as soon as they are ready.

Future group quarters population is projected by calculating the ratio between "2020 Group Quarters Population" (minus persons in Other Non-institutional Facilities) and "2020 Total Population." This ratio is then applied to the total future population projected by OFM. "Future Household Population" is calculated as "Future Total Population" minus "Future Group Quarters Population." Exhibit 15 shows an example of the calculations for an example county.

## Exhibit 15. Example: Calculating projected household population

| | Variable | Value | Data source |
|---|---|---|---|
| A | Total Population, 2020 | 539,339 | 2020 Census |
| B | Total Group Quarter Population, 2020 | 17,407 | 2020 Census |
| C | Other Non-Institutional Group Quarter Population, 2020 | 4,861 | 2020 Census |
| D | Assumed Future Group Quarter Population as a Percentage of Total Population: (B-C)/A | 2.3% | Calculation |
| E | Population Projection, 2050 | 629,823 | OFM (Medium Projection) |
| F | Projected Group Quarter Population, 2050: E*D | 14,651 | Calculation |
| G | Projected Household Population, 2050: E - F | 615,172 | Calculation |

# Projected households

To calculate total projected households for each county, divide projected future household population by an assumed future average household size. This household size is unique for each county and is calculated based on a methodology that considers both baseline demographic characteristics as well as projected demographic trends.

## Average household size

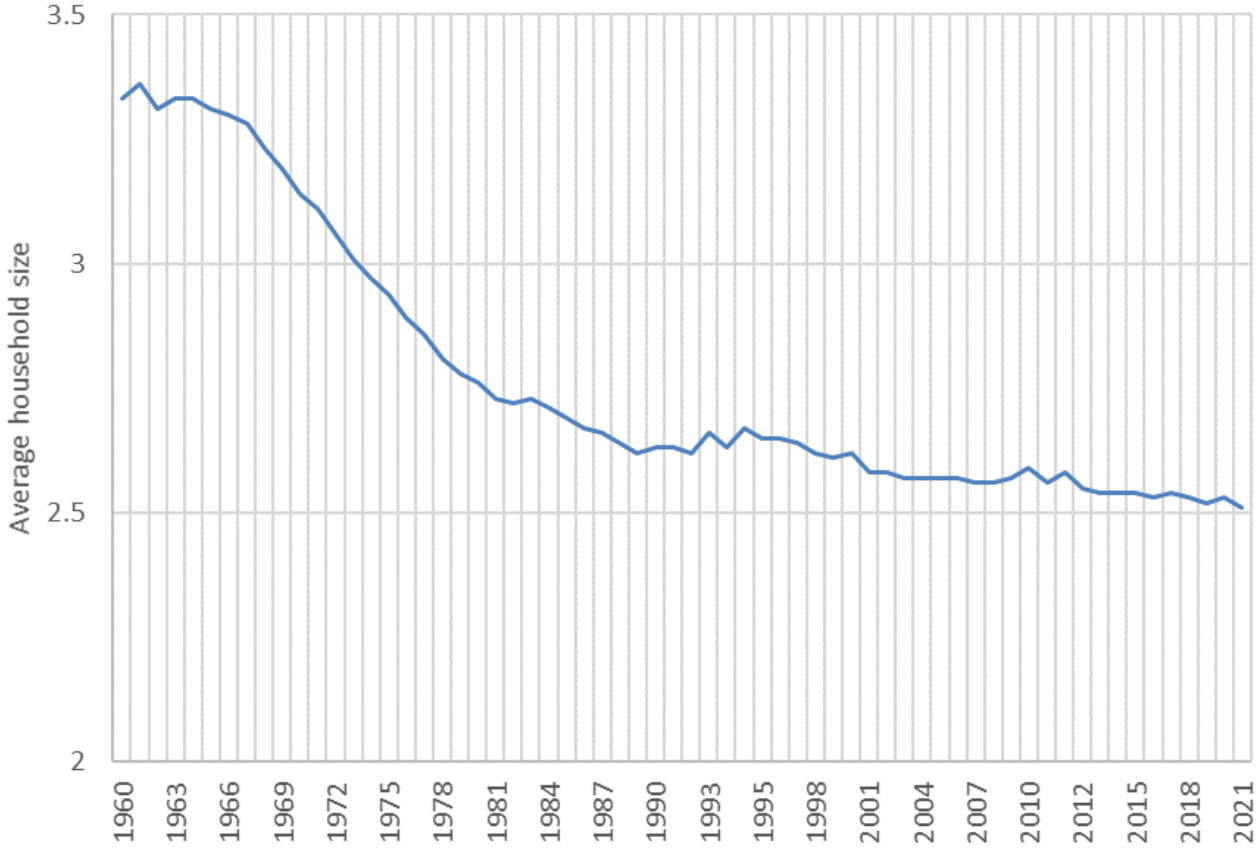
The average household size assumption has a significant impact on the number of projected households and therefore projected housing needs. Nationwide, there has been a long-term trend of declining average household size, as shown in Exhibit 16. However, during the past decade, average household sizes increased slightly in several Washington counties. This increase was likely to be at least in part related to widespread housing shortages and lack of affordable housing options. The Puget Sound Regional Council estimated that between 2010 and 2019 the region under-produced approximately 45,000 – 50,000 housing units compared to unconstrained household demand.[22]

Housing shortage can result in outcomes such as young adults deciding to continue living with their parents instead of moving out, or moving into a home with several roommates rather than finding their own place and forming new households.[23] It can also result in households struggling with housing insecurity to "double up" or combine with other households in overcrowded living spaces. These outcomes are indicators that the housing system is not providing enough units or enough affordable units to meet all housing needs. In other words, the slight uptick in average household size in some counties was likely caused by constraints in the housing supply.

[22] Puget Sound Regional Council (2022). Regional Housing Needs Assessment. https://www.psrc.org/sites/default/files/2022-09/rhna.pdf

[23] Joint Center for Housing Studies of Harvard University (2017). The State of the Nation's Housing 2017. http://www.jchs.harvard.edu/research/state_nations_housing

## Exhibit 16. Average number of people per household, nationwide




Source: Census Current Population Survey, 1960-2021 (Table HH-4)

Commerce's projection methodology assumes that fully meeting the needs of the future household population will require enough housing units to accommodate demographic trends that point to smaller household sizes in many Washington counties. The methodology also recognizes that all counties are different, and this trend is not likely to play out the same way in all communities across the state. Therefore, Commerce developed unique household size projections by county based on actual estimates from the 2020 Census as well as the expected impacts of projected demographic shifts—specifically the breakdown of projected population by age group.

This household size projection work builds on the fact that average household size varies significantly by age of householder,[24] as shown in Exhibit 17. It also builds on the fact that OFM's population projections indicate that an increasing share of residents in many counties will be older adults. Exhibit 18 shows these demographic projections for the entire state, with comparison between 2020 and 2050. Commerce's projection model uses the county-level projection by age range provided by OFM.[25]

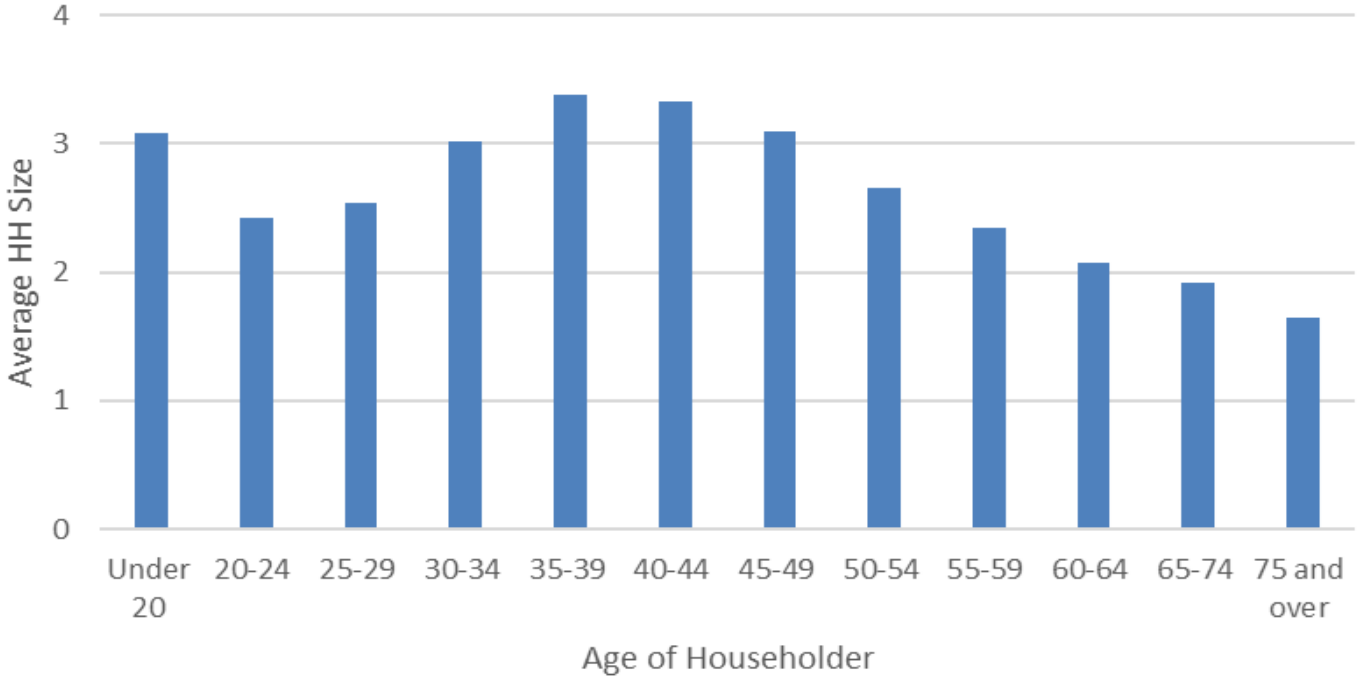
---

[24] The term householder refers to the person (or one of the people) in whose name the housing unit is owned or rented. https://www.census.gov/programs-surveys/cps/technical-documentation/subject-definitions.html#householder

[25] OFM's 2022 county population projections by Age and Sex, 5-Year Age Groups are available here: https://ofm.wa.gov/washington-data-research/population-demographics/population-forecasts-and-projections/growth-management-act-county-projections/growth-management-act-population-projections-counties-2020-2050.

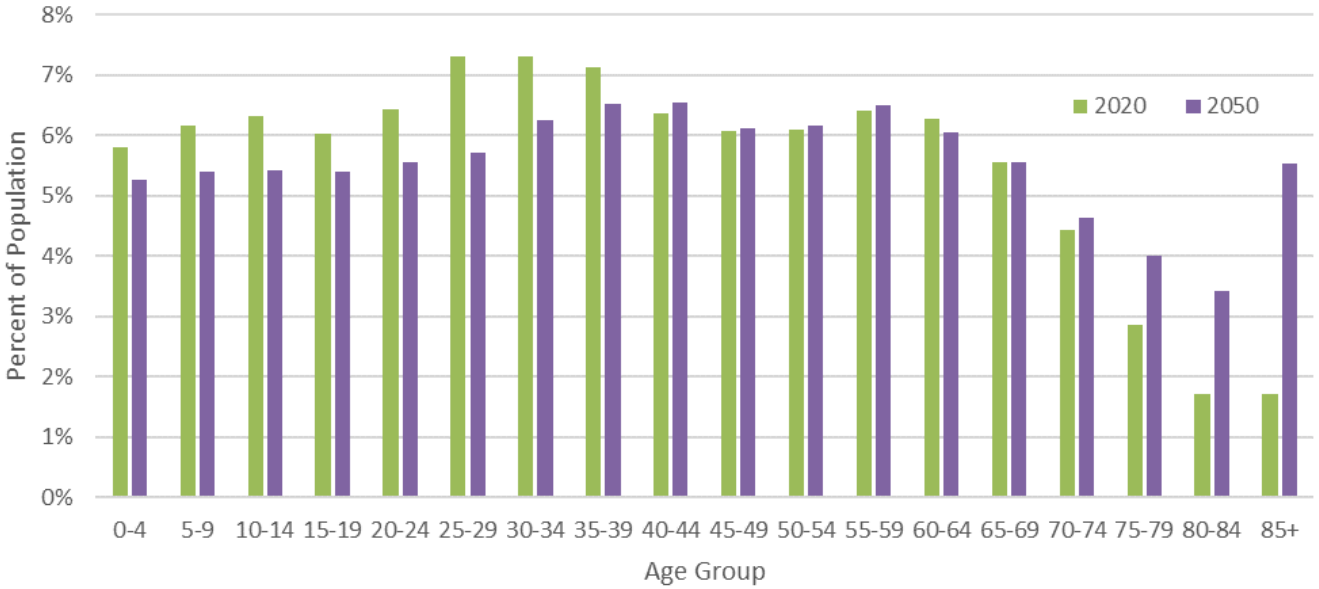
Of course, not all age groups are equally likely to be a householder. Many people under age 20, for example, are children living with parents or guardians. Therefore, the projection model accounts for the percentage of population at each age group that live in housing units, as well as the percentage of household population in each age group that are householders.

## Exhibit 17. Average household size by age of householder, nationwide




Source: U.S. Census Bureau, Current Population Survey, 2016 Annual Social and Economic Supplement

## Exhibit 18. Share of population by age group, 2020 and 2050




Source: OFM GMA Projections - Population by age and sex, five-year age groups, 2022

Exhibit 19 details the steps for calculating projected household size in the year 2050 for each county in Washington. Commerce's Housing for All Planning Tool (HAPT) includes a tab named "County Projection Input Data" that includes 2020 average household size and projected future average household size for every county in the state.

## Exhibit 19. Steps to calculate projected household size by county

| | Calculation | Geography | Source |
|---|---|---|---|
| A | Baseline household size, 2020 (Household population / occupied housing units) | County | Census 2020 |
| B | For each age group: Percent of population that live in housing units, 2020 (Household population / Total population) | Washington State | ACS 2016-2020 5-year estimates |
| C | For each age group: Percent of household population that are householders, 2020 (Householders / Household population) | Washington State | ACS 2016-2020 5-year estimates |
| D | Estimated population by age group, 2020 | County | OFM GMA Projections - Population by age and sex, five-year age groups |
| E | Projected population by age group, 2050 | County | OFM GMA Projections - Population by age and sex, five-year age groups |
| F | Estimated 2020 household population by age group (B*D) | County | Calculation |
| G | Projected 2050 household population by age group (B*E) | County | Calculation |
| H | Modeled number of households by age group, 2020 (C*F) | County | Calculation |
| I | Modeled number of households by age group, 2050 (C*G) | County | Calculation |
| J | Modeled average household size, 2020 (F/H) | County | Calculation |
| K | Modeled average household size, 2050 (G/I) | County | Calculation |
| L | Ratio of modeled average household size 2050 to modeled average household size 2020 (K/J) | County | Calculation |
| M | Final projected average household size, 2050 (A*L) | County | Calculation |

## Total projected housing unit need

To convert projected households to projected housing units needed, we divide projected households by 0.94 to accommodate a 6% vacancy rate.[26] Healthy housing markets generally need a 6% vacancy rate to ensure there is enough supply available to reduce intense competition for available units that can push up rents and housing prices. It also ensures there are a variety of housing options available to households looking to move for more space, downsizing, etc.

[26] According to the Lincoln Land Institute, a reasonable vacancy rate for a local housing market is between 4% and 8%. This study uses 6% as the midpoint in this reasonable range. Source: Lincoln Land Institute, 2018 "The Empty House Next Door", https://www.lincolninst.edu/publications/policy-focus-reports/empty-house-next-door

**Accounting for housing underproduction**

A key reason that housing costs are becoming more unaffordable is an imbalance between supply and demand. During the past few decades, housing production in Washington did not keep pace with job and population growth. As a result, many new households that would have formed were not able to do so. Examples may include young adults continuing to live with their parents instead of finding their own home, people living with several roommates in order to afford rent, or families "doubling up" or combining in a single home. Below is a summary of how Commerce's housing need projection methodology accounts for underproduction.

First, Commerce modeled what average household size should be in the projection year if new household formation is not constrained by the housing supply. In nearly all counties, this results in a decline in average household size. When household sizes are lower, more housing units are needed to accommodate the same population.

Next, Commerce applied this lower average household size to the entire forecasted population, not just the increment of new population growth. Therefore, our calculation of total housing need in the projection year accounts for the full needs of both baseline (2020) population and projected population growth.

Therefore, when Commerce subtracted the estimated 2020 housing supply from the total projected housing needs, the resulting calculation of net new housing need is inclusive of both housing to address historic undersupply as well as housing to address new population growth.

## Net new housing units needed

The final step is subtracting the estimated housing unit count in 2020 from the total projected housing units needed in the projection year to calculate the additional net new housing need. This calculation does not consider how many existing housing units may be demolished during the planning period. Typically, some existing housing units are demolished each year due to redevelopment or replacement of older homes. Therefore, gross housing production in a county will need to be somewhat higher than new housing units needed to achieve the total housing units needed by the projection year. Communities may wish to set higher housing production targets to account for expected loss of baseline housing due to demolition.[27]

The estimated 2020 housing unit count used in this calculation is adjusted to remove the estimated number of homes that are not available as permanent housing to meet the needs of full-time resident population. This includes two categories of vacant homes identified in Census ACS data:

- For seasonal, recreational or occasional use
- For migrant workers

The number of homes in these categories can be significant in counties that are either recreational destinations or have a large migrant agricultural workforce. See the textbox on "Accounting for Vacation Homes" for a discussion of considerations.

[27] One option for estimating the potential loss of units due to redevelopment is analyzing data from the County's buildable land report. Simply divide the total number of existing units on redevelopable parcels from the total capacity for net new housing growth throughout the jurisdiction (both redevelopable and vacant parcels combined) to calculate a percentage. Then estimate the number of units that could be lost to redevelopment by multiplying this percentage by the jurisdiction's housing growth target. This method assumes that redevelopable parcels are just as likely to be developed as vacant parcels. This assumption may not make sense in all communities.

**Accounting for vacation homes and migrant worker housing**

In some counties, a significant share of housing stock are vacation homes or short-term rentals. These homes are effectively unavailable to house full-time residents. This constrains the local housing supply. To address this issue, Commerce uses Census data to estimate the number of units dedicated for recreational use and assumes this count of units remains constant into the future (ACS Table B25004 – Vacancy Status). Essentially, these units are removed from the 2020 housing unit counts before calculating the net new units needed to accommodate the projected household population.

Similarly, Commerce uses Census data to remove housing units dedicated for migrant worker housing (ACS Table B25004 – Vacancy Status). Like vacation homes, these units are not available for full-time residents. Group quarter housing for migrant workers (typically housing provided by the bed and not by the unit) are not considered housing units, and therefore are not accounted for in these adjustments.

Note that Commerce's projections of net new housing need only consider units needed to accommodate projected household population. It does not project how many additional units will be needed to meet demand for new vacation homes or migrant worker housing in the future. Jurisdictions that have high demand for vacation homes may need to consider policies to encourage new housing development that accommodates full-time residents and limits the number of units devoted to vacation use or short-term rentals.

## Projected housing needs by income level

The methodology to distribute projected housing needs by income level is designed to address both baseline (2020) unmet housing needs as well as the projected additional housing needs to accommodate population growth. Exhibit 20 shows an overview of the projection method. For each individual income band, each of the three components is summed to calculate total projected net new housing need. The sum of net new units in all income bands is controlled to the total net new units calculated as shown in Exhibit 14.[28] Each component is described in more detail in the sections that follow.

### Exhibit 20. Overview of methodology to project net new housing needs by income level


The updates to the housing element requirements do not require an inventory of housing needs for households with incomes above moderate income (>120% of AMI). However, jurisdictions are still required to plan for all housing needs, including those >120% AMI, so the methodology accounts for these housing needs as well.

[28] If the sum of Housing to Eliminate Baseline Renter Cost-Burden and Housing for Baseline Homeless Population exceeds the total Projected Net New Units Need, the projection model adjusts the county's total net need upward and there is no component for Additional Housing to Accommodate Population Growth. This is a rare situation which only occurs in slower-growing counties that select a population target close to the OFM Low projection. See the textbox "What happens when baseline housing needs exceed Total Projected Net New Units Needed?" below for details.

**Accounting for the loss of affordable housing over time**

Housing costs have increased rapidly in recent years. As a result, housing in neighborhoods that were once considered affordable to low-income households are now out of financial reach. While this has been a real and measurable challenge in many communities, Commerce's projection methodology does not apply any assumptions about the loss of baseline affordable housing due to rising housing costs or to redevelopment and the need to replace them through preservation or new development. In other words, the calculation of net new housing units needed assumes that all baseline housing units remain at the same affordability level relative to area median income throughout the projection period. There are several reasons for this assumption:

- **In many areas, housing costs are not rising faster than AMI.** There are many areas of Washington where housing costs have not been increasing faster than median income. Therefore, even though housing costs are rising fast, they may not be rising compared to AMI. This can happen in counties that are seeing in-migration of higher-income households even when the incomes of many long-time residents have not increased significantly. This can result in housing costs becoming more and more out of reach of those long-term residents.
- **Rising market housing costs are caused by undersupply compared to demand.** Commerce's housing needs projections include enough new housing to keep pace with projected household demand. If communities increase housing production enough to keep pace with Commerce's projections at each income band, this would be expected to moderate the rate of housing price escalation so that housing costs would typically no longer be rising faster than median income.
- **Commerce provides projections of the total number of units needed at each income level.** Counties with concerns about the loss of affordable housing can plan towards meeting the total housing needs, inclusive of those needs accommodated by the baseline housing supply. This could involve developing programs for affordable housing preservation, monitoring their affordable housing stock, and identifying units with expiring subsidies or covenants that are in need of preservation. Commerce makes no assumptions about the number of units that are preserved in this manner when calculating net new housing needs at each income level.

## Housing needed to eliminate baseline renter cost burden

The first step to projecting housing needs by income level is estimating the number of new units needed to address baseline (2020) unmet housing needs. A good measure of unmet housing needs is housing cost burden. A cost-burdened household is spending more than 30% of its income on housing costs.[29] Each cost-burdened household is an indicator of an under-supply of housing affordable at that household's income level. Therefore, the goal of this projection methodology is to determine how much new housing by affordability level is needed to accommodate each cost-burdened renter household with an affordable unit. This methodology also accounts for units that would be vacated by these cost-burdened households and therefore available to be occupied by another household.

The first step is calculating estimates of "Cost-Burdened Renter Households in 2020." Here the methodology uses HUD Comprehensive Housing Affordability Strategy (CHAS) data for 2018, and then scales up the estimates of cost-burdened households at each income level to 2020 levels based on the ratio between HUD's total 2018 household estimates and the estimates of 2020 households from Census 2020 data. The HUD CHAS dataset groups all cost-burdened households with incomes above 100% AMI into one income bracket. This analysis assumes all of these cost-burdened households have incomes between >100 and >120% AMI.

[29] The U.S. Department of Housing and Urban Development (HUD) determined this standard for housing affordability.

Next, the model determines "New Production to Address Need" at each income level over time, assuming that 1/25th of the need to eliminate renter cost burden is built each year.[30] For every unit built, the needs of up to two cost-burdened households is assumed to be addressed. For example, when a new housing unit affordable at 0-30% AMI is built, it can accommodate a baseline cost-burdened household with income of 0-30%. Then, the unit that household previously occupied is vacated and available to accommodate another higher-income cost-burdened household.

The model uses HUD CHAS data about the affordability level of units occupied by renter households at each income level to determine the affordability level of units vacated. By accounting for units vacated at each income level, the model reduces the number of net new units needed to be produced to eliminate renter cost burden in higher income bands. The model continues to build homes and vacate units until there are no more cost-burdened renter households to accommodate.[31] Exhibit 21 shows the results of these calculations for an example county.

## Exhibit 21. Example: Housing needed to eliminate renter cost burden

| Income level (% of AMI) | Cost-burdened renter households, 2018 | Ratio of 2020 households to 2018 households* | Cost-burdened renter households, 2020 | New production to address need** | Units vacated that address need |
|---|---|---|---|---|---|
| 0-30% | 11,845 | | 12,679 | 13,489 | 0 |
| >30-50% | 11,040 | | 11,818 | 7,979 | 4,593 |
| >50-80% | 8,575 | | 9,179 | 1,416 | 8,349 |
| >80-100% | 1,925 | | 2,061 | 219 | 1,973 |
| >100-120%*** | 910 | | 974 | 0 | 1,055 |
| Total | 34,295 | 1.07 | 36,710 | 23,103 | 15,970 |

Cost Burden data source: HUD CHAS (Based on Census ACS 2014-2018 5-year estimates)
*Percentages do not show all decimal places. Therefore, the Cost-Burdened Renter Households, 2020 differ slightly from what can be calculated with the rounded percentages in the table.
** New Production to Address Need assumes a 6% vacancy rate and accounts for units vacated that address need. See text above for how these values were calculated.
*** HUD CHAS data summarizes cost burdened renter households with incomes of 100% AMI or above. This methodology assumes that all of these households fall in the >100-120% AMI income level.

[30] This model recognizes that all the units needed to eliminate cost-burden cannot be built instantaneously. By modeling the development of these new units over time, we can more accurately account for the role that vacated units play in eliminating cost burden at higher income bands.
[31] Note that the homes built in this model are only those needed to address baseline renter cost burden. These are not the homes needed to accommodate projected household growth.

**Why are cost-burdened owner households excluded from this method?**
This methodology to calculate units needed to Eliminate Cost Burden only accounts for the needs of cost-burdened renter households. While there are many cost-burdened owner households, these households are in a fundamentally different financial position compared to renter-households. Owner households have equity in an appreciating asset that provides them with financial options and opportunities not available to a renter household. Additionally, some of these owner households are retired and may have access to savings or resources not reported as income. Finally, there are other tools and programs that local jurisdictions can and should use to help reduce the cost of homeownership for lower-income homeowners. Therefore, building new housing units for these owner households to occupy is not necessarily the best or only solution for these households. Because of these factors, Commerce does not include cost-burdened owner households in our calculations of new units needed to eliminate cost burden.

## Housing needed for the population experiencing homelessness

Commerce has estimated individuals and households experiencing homelessness for each county in Washington state in 2020. In the "Emergency Housing and Permanent Supportive Housing" section further below, we describe how these estimates are calculated, including assumptions for converting individuals experiencing homelessness to households. In this step we assume that 90% of households experiencing homelessness need permanent housing affordable at 0-30% AMI and 10% of households experiencing homelessness need permanent housing affordable at the >30-50% AMI level, as shown in Exhibit 22.[32]

### Exhibit 22. Example: Housing needed for population experiencing homelessness

| Income level (% of AMI) | Total estimated households experiencing homelessness* | Assumed percentage by income level | Total households by income level experiencing homelessness |
|---|---|---|---|
| 0-30% | | 90% | 7,022 |
| >30-50% | | 10% | 780 |
| Total | 7,802 | | |

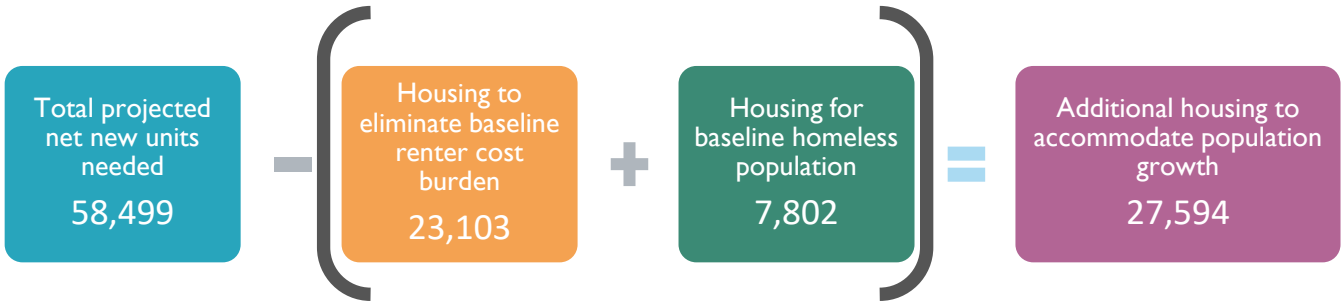
* Methodology and calculations for estimating total households experiencing homelessness are provided in the "Emergency Housing and Permanent Supportive Housing" section below.

## Additional housing to accommodate population growth

The previous two components address baseline housing needs as of 2020. Counties also need to provide enough new housing to accommodate population growth. The total units needed for this last component is calculated by simply subtracting total "Housing to Eliminate Baseline Renter Cost Burden" and "Housing for Baseline Homeless Population" from the "Total Projected Net New Units Needed." Exhibit 23 shows an example of this calculation.[33]

[32] This breakdown is based on an analysis of the income level of recipients of services in Commerce's Integrated Client Database.
[33] It is possible for the calculation in Exhibit 23 to result in a negative value. See a discussion in the text box below entitled "What happens when baseline housing needs exceed Total Projected Net New Units Needed?"

## Exhibit 23. Additional housing to accommodate projected household growth, 2020-2050




Commerce assumes that future household growth will include households across the entire income spectrum, and that the percentage of these households by income level will mirror that of the baseline households.[34] Therefore, the "Additional Housing to Accommodate Population Growth" total is broken down by affordability level according to the same percentages as the baseline household population.

These percentages for each county are based on HUD CHAS data (derived from ACS 2014-2018 5-year estimates). However, CHAS data groups all households with incomes at 100% AMI or greater. Therefore, Census Public Use Microsample (PUMS) data was used to breakdown households with incomes >100% AMI into two groups: >100-120% AMI and >120% AMI. The resulting percentages are then applied to the total "Additional Housing to Accommodate Population Growth." See Exhibit 24 for an example of these calculations.

## Exhibit 24. Additional housing to accommodate population growth by income level, 2020-2050

| | Income level (% of AMI) | Percentage of households by income level | Additional housing to accommodate population growth by income level |
|---|---|---|---|
| Additional housing to accommodate population growth:<br><br>27,594 | 0-30% | 11.18% | 3,086 |
| | >30-50% | 10.98% | 3,031 |
| | >50-80% | 16.85% | 4,649 |
| | >80-100% | 10.33% | 2,850 |
| | >100-120% | 8.93% | 2,464 |
| | >120% | 41.72% | 11,513 |

Source for percent of households by income level: HUD CHAS and Census PUMS (both based on Census ACS 2014-2018 5-year estimates)

Exhibit 25 shows how all of the model calculations described above come together to calculate "Total Net New Housing Needed, 2020-2050" by income level for an example county.

[34] Recent trends show that income disparity is growing throughout Washington state and the U.S. This trend is resulting in an increased share of households at the bottom and top of the income spectrum, with reductions in the middle. However, this is not a desirable outcome, and lack of affordable housing near locations of opportunity may be a contributing factor to this outcome. Keeping the percentages constant is a simple assumption that also reflects a policy goal to provide opportunities at all income levels.

## Exhibit 25. Example: Total net new housing need by income level, 2020-2050

| Income level (% of AMI) | Housing production needed to eliminate renter cost burden | Housing needed for population experiencing homelessness, 2020 | Additional housing to accommodate population growth | Total net new housing needed, 2020-2050 |
|---|---|---|---|---|
| 0-30% | 13,489 | 7,022 | 3,086 | 23,597 |
| >30-50% | 7,979 | 780 | 3,031 | 11,790 |
| >50-80% | 1,416 | 0 | 4,649 | 6,066 |
| >80-100% | 219 | 0 | 2,850 | 3,069 |
| >100-120% | 0 | 0 | 2,464 | 2,464 |
| >120% | 0 | 0 | 11,513 | 11,513 |
| Total | 23,103 | 7,802 | 27,594 | 58,499 |

**What happens when baseline housing needs exceed Total Projected Net New Units Needed?**
With this methodology it is possible for the sum of the first two components of baseline housing needs (Housing to Eliminate Baseline Renter Cost Burden and Housing for Baseline Homeless Population) to exceed Total Projected Net New Units Needed. Following the calculation in Exhibit 23, this would result in a negative value for Additional Housing to Accommodate Population Growth. This outcome is likely in counties that have a great deal of baseline cost burden and/or homelessness as well as limited or no population growth. When this occurs, Commerce's projected housing needs by income level are equal to just the first two components (Housing to Eliminate Baseline Renter Cost Burden and Housing for Baseline Homeless Population). In these cases, needs for households with incomes above 120% are assumed to be zero. For counties in this situation, it may be appropriate to meet some of the needs for low-income households through vouchers or purchasing of existing market rate units and subsidizing to make them affordable at lower income levels.

# Emergency housing and permanent supportive housing

To project future need for emergency housing and PSH, Commerce begins with estimates of the current population experiencing homelessness. Then, assumptions were developed about how this population may change over time in the years to come. While all population projections are subject to error, homelessness has additional confounding factors that may influence the overall reliability of these projections. First, homelessness often increases in the aftermath of natural disasters (e.g., wildfire) and economic shocks that are difficult to predict. By leveraging historical homelessness data in Washington, these projections account for past need, but future events could lead to sharp spikes in homelessness that are not accounted for here.

The true scale of homelessness in any community can be difficult to measure. The Point-in-Time (PIT) count, which is often used as a measure of homelessness in communities, typically relies on information collected via a one-night census, which can be impacted by weather, volunteer coverage, lack of access or knowledge of where people experiencing homelessness are located, and other factors. In Washington, the Department of Commerce draws on information from the Homeless Management Information Systems (HMIS) and homelessness flags in social service applications (e.g., Temporary Assistance to Needy Families) to compare to local PIT counts, finding that local PIT counts may only count approximately one-third of individuals experiencing homelessness.

Further, HMIS systems may also undercount homelessness. HMIS relies on participation from homeless service providers, often referred to as "bed coverage." In 2021, Washington's bed coverage rate in HUD's Housing Inventory Count was 72%, meaning approximately one in four homeless system beds are not reflected in the current data. King County conducted a cross-system analysis[35] with Health Care for the Homeless Network (HCHN) and King County's Behavioral Health and Recovery Division (BHRD) and found that approximately 18% of people experiencing homelessness in King County were not included.

## About the data sources

Data for emergency housing and PSH needs projections are from the Homeless Management Information System (HMIS) and the Snapshot of Homelessness report. A Homeless Management Information System (HMIS) is a local information technology system used to collect client-level data and data on the provision of housing and services to individuals and families experiencing homelessness and persons at risk of homelessness. Washington's HMIS is operated by the Department of Commerce. HUD-funded programs are required to use HMIS, while other providers may opt into the system. The data for HMIS participating projects was provided by the Department of Social and Health Services (DSHS) Research and Data Analysis (RDA) unit based on HMIS enrollments[36] for 2020 for each county.

The Snapshot of Homelessness ("Snapshot") is a report created by the Department of Social and Health Services (DSHS) Research and Data Analysis (RDA) unit. Drawing on linked data from multiple databases used for administering public benefits and associated claims, the report counts applications for social services from people who were unsheltered or living in emergency shelter. The full report includes those who are doubled up as "unstably housed," but that category is not used in this methodology. A more detailed description[37] of the Snapshot report is available on the Commerce website.

The HMIS data collected for this housing needs analysis excludes clients enrolled only in homelessness prevention projects, and the Snapshot data for this housing needs analysis excludes those who were "unstably housed." These exclusions were made because:

- Feedback from stakeholders and Commerce indicated that prevention data in HMIS is not consistent across counties, which would lead to inconsistencies in capturing need across the state.
- The methodology makes other adjustments to account for the population at-risk (including imminent risk) of homelessness. Although people at-risk of homelessness may include those who are doubled up or living in overcrowded housing, these individuals are accounted for in the methodology for housing needs by income level. People at risk of homelessness may also include those who are severely cost burdened

---

[35] King County Department of Community and Human Services, Performance Measurement and Evaluation (2021). Integrating Data to Better Measure Homelessness. https://kingcounty.gov/~/media/depts/community-human-services/department/documents/KC_DCHS_Cross_Systems_Homelessness_Analysis_Brief_12_16_2021_FINAL.ashx?la=en

[36] HMIS enrollments are by project type. The following project types are included in the base counts for this methodology: Day shelter, emergency shelter, permanent housing- housing only, permanent housing- housing with services, permanent housing- permanent supportive housing, permanent housing- rapid rehousing, safe haven, street outreach, traditional housing, services only, and other. For those enrolled in a permanent housing project, if the client was living in permanent housing (based on move-in date within HMIS) as of January 1, 2020, they were not included in the count. If a client had any later move in date, they were included for the year because they experienced homelessness for at least one day. Coordinated Entry/Coordinated Assessment enrollments were not included due to poor data quality in some places. If a county is collecting and maintaining coordinated entry data to a high standard, it is possible HMIS counts would be higher than what is reflected in this methodology. . Please refer to this HUD Notice (https://www.hud.gov/sites/documents/17-01CPDN.PDF) for an overview of coordinated entry/coordinated assessment and its relationship to HMIS. Prevention projects were also excluded, as not every county implements prevention or uses HMIS for this data. For Cowlitz County only, Service Only HMIS enrollments were purged from the data due to data quality issues.

[37] https://deptofcommerce.app.box.com/s/hnpkedlkifogzx8i892cu0k34nzsrbtp/file/1072115571085

and at-risk of imminently losing housing due to affordability. The Eliminate Cost Burden component of the housing needs projections by income level account for these housing needs.

- Some households considered at imminent risk of homelessness or unstably housed may need emergency housing, and therefore the emergency housing projection methodology accounts for significant risk factors of homelessness (see section further below titled "Projected Needs for Emergency Housing").

## Stakeholder engagement

The methodology presented below was developed with considerable input from stakeholders across Washington. Commerce held focus groups with each region of the state, ensuring at least one representative from each county was invited. Attendees included homeless service employees, planning professionals, affordable housing developers, government leadership and people with lived experience of homelessness or housing instability.

The topics within these focus groups included the extent and nature of undercounting homelessness (and how to correct for it), risk factors for homelessness and methods for allocating housing needs. After the methodology was developed, Commerce held a second focus group with engaged stakeholders from across the state to provide additional input that is reflected in this version of the projection method.

## Impacts of affordable housing provision on emergency housing

The projections presented below are based on current levels of system performance for housing in counties across Washington and assume only modest improvements over time. Research has demonstrated that homelessness can be substantially reduced through investments in housing and supportive services. For example, a previous HUD study[38] showed that providing families with permanent housing vouchers reduced emergency shelter and PSH use. Should the state or localities substantially increase resources for the homeless system and affordable housing, rates of homelessness (and consequently the number of beds needed to shelter those individuals) may drop.[39]

Numerous studies have demonstrated that providing housing and supportive services defrays costs to law enforcement, emergency rooms and other public services.[40] Based on these findings, it is reasonable to assume that providing vouchers for housing or income-restricted housing at and below 50% AMI can decrease homelessness. In such cases, this would lead to decreased need for emergency housing below what is projected using the current method.

Given that fully meeting the permanent housing needs at all income levels (including PSH) would reduce the amount of emergency housing needs, Commerce's "Land Capacity Guidance" treats emergency housing differently. See the "Guidance for Updating your Housing Element" (2023) document for a more detailed discussion. In some cases, emergency housing may be converted to permanent housing. For example, in King

---

[38] Gubits, D et al. (2016). Family Options Study. Prepared for the U.S. Department of Housing and Urban Development. https://www.huduser.gov/portal/sites/default/files/pdf/Family-Options-Study-Full-Report.pdf

[39] This point has implications for demonstrating land capacity to accommodate both permanent supportive and emergency housing needs. See Commerce's "Land Capacity Guidance" in the "Guidance for Updating your Housing Element" (2023) document for details.

[40] National Alliance to End Homelessness (2017), Ending Chronic Homelessness Saves Taxpayers Money (https://endhomelessness.org/resource/ending-chronic-homelessness-saves-taxpayers-money-2/%22); Hunter et al (2017), Evaluation of Housing for Health Permanent Supportive Housing Program, Prepared for RAND Corporation (https://www.rand.org/pubs/research_reports/RR1694.html); Ly, A. and E. Latimer (2015), Housing First and Impact on Costs and Associated Cost Offsets, Canadian Journal of Psychiatry, (60)11 (https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4679128/)

County, the Health through Housing[41] Initiative jointly works to meet emergency housing needs in the short-term as well as create longer-term affordable housing options.

## Two baseline counts for projecting needs

The permanent supportive and emergency housing needs projections presented here are based on estimates of homelessness developed with two separate baseline counts. One baseline uses HMIS data and the other uses counts from the Snapshot report. Both are likely to produce underestimates of homelessness as they rely on individuals engaging in services and being eligible for programs, which is not always the case when an individual experiences housing loss. The two baseline counts were created in response to stakeholder feedback that the highest, and likely most accurate, count of homelessness varied by data source in each county. Descriptions of how each baseline count is used are described further below.

Emergency housing projections are the same using either HMIS or the Snapshot, therefore only one number is provided in Commerce's HAPT. Permanent supporting housing projections in the HAPT are based on the higher baseline count: either from the HMIS or Snapshot.[42] Communities may choose to use projections based on the other count if it is deemed more appropriate through local decision-making processes. For example, some counties intake people experiencing homelessness from neighboring counties due to the availability of services, thus increasing their HMIS numbers. In this case, the community may choose to use the Snapshot baseline as a better estimate of homelessness within their own county boundaries.

If a jurisdiction chooses to use the alternative model of PSH than noted in the HAPT, it is recommended the jurisdiction identify in its comprehensive plan or housing needs assessment the justification for choosing the alternative model.[43] See the Appendix B: Emergency housing and PSH projections section at the end of this document to review the results for both baseline counts.

## Impact of COVID on baseline data

The baseline year for HMIS data, Snapshot data and data for the projection risk factors is 2020, during which COVID impacted many sectors, including homeless services. In many counties, homeless counts in HMIS and other sources decreased from 2019 to 2020. This may be due to services becoming unavailable or eviction moratoriums stemming entry into the system. The projection model includes adjustments to correct for potential undercounts of homelessness in the baseline data. For every year past the baseline, the model does not rely on homeless service data and instead includes social and economic factors that have been causally linked to homelessness in previous research.[44] For all variables, pre-COVID trends were analyzed to understand if that risk factor was increasing or decreasing, with the appropriate trend reflected in the model. The long-term impacts of COVID are unknown and may disrupt these trend patterns as communities end COVID restrictions.

---

[41] https://kingcounty.gov/depts/community-human-services/initiatives/health-through-housing.aspx

[42] Emergency housing projections assume a large amount of year-to-year turnover as people move into housing, meaning that by the final year of the projection, no one from the baseline count will remain homeless. This eliminates the impact of different baselines from the projection. PSH assumes long-term residency and therefore the baseline count of need has a greater impact on overall unit need, as the model assumes a small number of individuals who moved into PSH in the baseline year may remain there over the preceding years.

[43] Additionally, the county should adjust its projected need for Non-PSH 0-30% AMI housing. Commerce calculates this number by subtracting the net new PSH need from the total 0-30% AMI need. Therefore, if the county uses a lower number for PSH need, then it needs to subtract that number from the sum of PSH and Non-PSH 0-30% AMI need as shown in the Housing for All Planning Tool.

[44] Nisar, H et al. (2019). Market Predictors of Homelessness. https://www.huduser.gov/portal/sites/default/files/pdf/Market-Predictors-of-Homelessness.pdf

# Emergency housing needs projection methodology

Within the GMA, the definitions for both emergency housing and emergency shelter include temporary accommodations. In implementation, there may be an overlap between what could be considered emergency housing versus emergency shelter. For this reason, emergency housing and emergency shelter are projected as a single category. While the emergency shelter definition includes facilities such as warming and day centers, these services generally do not provide overnight accommodations and are not considered or counted as beds or units in the projections of need.

The projections account for the total number of individuals experiencing homelessness, estimating the needed number of temporary accommodations to functionally end unsheltered homelessness. This number also accounts for current baseline needs, including those who are currently in shelter, fleeing domestic violence through the homeless service system, and experiencing unsheltered homelessness.

In both the HMIS and Snapshot models, there is a single projection for all emergency housing and shelter needs. In many communities, shelters and service providers focus on specific populations (e.g., families, survivors of domestic violence, youth) and many shelters are divided by gender identity. These projections do not specify which populations should or could be served in the allocated units. Communities should draw on local knowledge of need, HMIS data, PIT Count and other data sources to determine the mix of populations to be served in these projected units. Every effort should be made to create low-barrier emergency shelter and housing options that can serve diverse populations and household types. Low-barrier shelters and housing options serving diverse populations create efficiencies and are effective in getting resources to those in need more quickly.

In the past, some communities have found that emergency shelter beds go unused even when there is need. The model does not make assumptions about the underutilization of emergency housing beds and units and instead provides the amount of emergency housing that would be needed to shelter every household experiencing homelessness, consistent with the goals of the housing element. Current underutilization of shelter may be related to prohibitive policies, such as not allowing pets, requiring sobriety or instating strict curfews that may conflict with work schedules. Additionally, congregate shelter arrangements may be uncomfortable, trigger trauma or exacerbate other health concerns.

Though all current shelter, safe haven and transitional housing units are accounted for in this projection, low barrier, non-congregate emergency housing options that emphasize harm reduction may help increase the utilization of these units. Non-congregate units may also be more suitable for conversion to permanent housing, later being transformed to meet changing housing needs over time and provide units for low-income households.

Emergency housing needs may be met through a number of different housing types. Emergency housing may include, but is not limited to, traditional shelter arrangements, hotel rooms, tiny home villages or short-term apartments. Regardless of the housing type that a county is implementing for emergency housing, the facility must be indoors and allow for access to personal hygiene facilities (e.g., a restroom), meeting the requirements for shelter or other facility types based on current Washington Shelter Guidelines[45] developed by the Department of Commerce for Washington state shelter program grant funds.

[45] https://deptofcommerce.app.box.com/s/whsi7x1qb8k9r6ozn8rzjedajcp2xjt5

## Baseline (2020) number of people experiencing homelessness

The projections of housing needs account for both baseline (2020) and future needs for emergency housing and shelters. To determine these needs, two baseline models were developed. The first is based on HMIS data, and the second is based on the Snapshot report from Washington State Department of Commerce. The methodology for each model is described below.

### HMIS model for number of people experiencing homelessness

1. Create a base count of every person experiencing homelessness in HMIS[46] for each county in Washington. This projection accounts for the number of units needed to shelter or temporarily house every individual and household who experiences homelessness and therefore assumes that those eligible for PSH will stay in emergency accommodations before moving into a unit.

2. Adjust for potential undercounts by using the Continuum of Care (CoC) bed coverage rate for emergency shelter, transitional housing and safe havens.[47] The bed coverage rate is the percentage of emergency housing beds that participate in HMIS.[48] The bed coverage not included in HMIS was assumed to be the adjustment factor needed to obtain an accurate count of homelessness. For a bed coverage rate of 63%, the projection would multiply the total number of individuals identified in HMIS by 1.5873 to get a get a more realistic count of homelessness. The adjustment factor was calculated by dividing 1 by the bed coverage rate. Commerce was able to calculate a unique bed coverage rate for each county.[49] The table below shows this adjustment factor in sample counties with a high, average and low bed coverage rate.

| County | Unduplicated HMIS county 2020 | Bed coverage rate | Bed coverage rate adjustment factor to HMIS county | Total persons after adjustment |
|---|---|---|---|---|
| Whitman | 187 | 100% | 1 | 187 |
| Clallam | 1,409 | 63% | 1.5873 | 2,237 |
| Adams | 4 | 8% | 12.5 | 50 |

### Snapshot model for number of people experiencing homelessness

The Washington State Department of Social and Health Services (DSHS) releases the Snapshot report in January and July of each year. While the Snapshot is published as a point-in-time count, for this project, it was converted to an annual count. The annual Snapshot count was derived using the same methodology as the point-in-time count described in the published reporting specifications,[50] but with parameters to count unique clients for the entire year. No bed coverage adjustment is applied to the Snapshot count, as it made counts of homelessness unreasonably high in draft versions of this methodology.

---

[46] For this and all other base counts of people within HMIS, it does not include people who were housed and still enrolled in a service (e.g., housed through PSH), nor does the count include clients enrolled in homelessness prevention. See section "About the Data Sources" for a more thorough description of the HMIS projects included in this count.

[47] Safe haven is a form of supportive housing for people experiencing homelessness with severe mental illness. HUD is no longer funding new safe haven programs, but has continued to provide renewal funds for existing projects.

[48] The bed coverage rate for each county was calculated by matching the Washington Golden report to a detailed Housing Inventory Count (HIC). Both reports are produced by the Department of Social and Health Services (DSHS) Research and Data Analysis (RDA) unit. The Golden contains financial and project information on homeless services. The HIC is a mandated HUD report generated for each Continuum of Care (CoC) that contains bed counts by project. RDA was able to break out these counts by county rather than CoC for the purpose of this project.

[49] Douglas County has a bed coverage rate of 0%. In this instance, the highest adjustment factor from all other counties was used.

[50] https://deptofcommerce.app.box.com/s/hnpkedlkifogzx8i892cu0k34nzsrbtp/file/1072115571085

## Projected needs for emergency housing

Commerce used a special kind of statistical modeling, called Monte Carlo simulation, to project needs for emergency housing through 2050. Monte Carlo simulation methods are used to estimate probabilities of uncertain events by looking at possible ranges of probabilities that influence them. It builds models of possible results through probability distributions, recalculating the results 10,000 times using a different set of random numbers between the minimum and maximum values for each variable. The Monte Carlo method has been used to estimate housing stock,[51] population estimates,[52] risk factors for homelessness,[53] and other topics relevant to this projection. This method allowed Commerce to project homelessness based on specific risk factors and use data unique to each county. In other words, counties with higher levels of risk for homelessness would have the potential for higher homelessness projections and counties with lower levels of risk would have lower projections.

The following inputs were selected to build the simulation, based on prior research on risk factors for homelessness and feedback from stakeholders across the state. Each input is described in detail below. For each input, the model assumes a certain percentage of people with each risk factor will become homeless (referred to as the incidence rate of homelessness).

**Disability rate**

- Data source: American Community Survey Table S1810; Disability Characteristics
- Variable: Non-institutionalized population with a disability
- Incidence rate of homelessness: 1-2%, based on regression coefficients from prior studies
- Rationale for inclusion: Certain disabilities (e.g., substance use, depression) have been linked to homelessness in prior studies. Feedback from stakeholders indicated that people who have a disability are more likely to experience homelessness for a prolonged period.
- Change over time: This model assumes the rate of disability remains constant through the length of the projection.

**Evictions**

- Data source: Eviction Lab[54]
- Variable: 2000-2015 state eviction rate of 0.82% held constant across counties
- Incidence rate of homelessness: 3%-15% of evictions result in homelessness based on prior surveys of incidence of homelessness from eviction in Chicago, Illinois; Santa Cruz, California; and King County, Washington. In high-cost continuums of care, which include King and Pierce counties in Washington, the effect size of this variable is larger. Therefore, the incidence rate was constrained to 7-15% in those counties, and 3-7% in all other counties.
- Rationale for inclusion: Evictions do not always lead to homelessness, but increases in the number of eviction filings and executed evictions are likely to lead to increased homelessness.[55]

---

[51] Booth, A.T. et al. (2012). Handling Uncertainty in Housing Stock Models. *Building and Environment,* 48, https://www.sciencedirect.com/science/article/abs/pii/S0360132311002599

[52] Pflaumer, P. (1988). Confidence Intervals for Population Projections Based on Monte Carlo Methods. *International Journal of Forecasting,* 4(1), https://www.sciencedirect.com/science/article/abs/pii/0169207088900155

[53] Washington, D. et al. (2010). Risk Factors for Homelessness Among Women Veterans. *Journal of Healthcare for the Poor and Underserved,* 21 (1), https://muse.jhu.edu/article/372082

[54] Heburn, P. et al (2020). Eviction Tracking System. Published by Princeton University. https://evictionlab.org/map/#/2016?geography=states&type=er&locations=53,-120.458,47.372

[55] Crane, M. and A. Warnes (2000). Evictions and Prolonged Homelessness. *Housing Studies, 5,* https://www.tandfonline.com/doi/abs/10.1080/02673030050134592?casa_token=w2g6P5mQTqQAAAAA%3A7giUyO7dzoa9_Fn0TZC2sEXU0ByRQROwpcFse4MOCW765lecGynWC0KNjRC8DQN5H0-v0zPFgHondg&journalCode=chos20;%20https://scholar.harvard.edu/mdesmond/files/desmond.evictionpoverty.ajs2012.pdf; Cookson,

- Change over time: Eviction counts have remained stagnant or dropped in many counties. This model assumes the eviction rate remains 0.82% over the course of the projections.

**Foster care**

- Data source: Foster Parent Alliance of Washington
- Variable: Number of dependency and termination filings
- Incidence rate of homelessness: 3-5%, based on regression coefficients in prior studies
- Rationale for inclusion: Adverse childhood experiences and foster care has been linked to homelessness in prior studies. Feedback from stakeholders indicated that foster and unaccompanied youth are among the most vulnerable clients within the homeless service system.
- Change over time: This model assumes the rate of foster care remains constant through the length of the projection.

**Incarceration**

- Data source: Washington Department of Corrections
- Variable: Prison releases by county
- Incidence rate of homelessness: 1-2%, based on incidence from prior studies
- Rationale for inclusion: While the connection between criminal history, incarceration and homelessness is mixed across studies, feedback from stakeholders indicated that the re-entry population is in need of homelessness services and at significant risk of homelessness.
- Change over time: This model assumes the rate of incarceration and releases remains constant through the length of the projection, as these rates are likely more related to the number of available jail and prison facilities than crime rates or other factors.

**One-person households**

- Data source: American Community Survey Table S2501; Occupancy Characteristics
- Variable: Proportion of one-person households
- Incidence rate of homelessness: 1-2%, based on regression coefficients in prior studies
- Rationale for inclusion: One-person households have been correlated with homelessness in prior studies, and the average household size for those experiencing homelessness is smaller than that of the housed population. Feedback from stakeholders indicated that those who fall into homelessness are less likely to have a support system, and a single-person household may be a proxy for that. One-person households are generally paying a higher proportion of their income towards rent and may have fewer affordable housing options.[56] While one-person households are not uncommon, and developers in many cities are building high-cost studio and one-bedroom apartments designed for single residents, this model assumes a low incidence rate of homelessness from one-person households. This variable was only included for King and Pierce counties, as a recent HUD study found this variable to be statistically significant in high-cost continuums of care.
- Change over time: This model assumes that the proportion of one-person households remains constant over the course of the projection.

**Overcrowded housing**

- Data source: American Community Survey Table B25014; Tenure by Occupants Per Room
- Variable: Proportion of households with more than one occupant per room

---

T. et al. (2018). Losing Home: The Human Cost of Eviction in Seattle. Prepared by The Seattle Women's Commission and King County Bar Association, https://www.seattle.gov/documents/Departments/SeattleWomensCommission/LosingHome_9-18-18.pdf

[56] Nisar, H. et al. (2019). Market Predictors of Homelessness. Prepared for the U.S. Department of Housing and Urban Development, https://www.huduser.gov/portal/sites/default/files/pdf/Market-Predictors-of-Homelessness.pdf

- Incidence rate of homelessness: 2-4% in all other counties, 5%-6% in King and Pierce
- Rationale for inclusion: Overcrowding is a statistically significant predictor of homelessness in prior studies. Feedback from stakeholders indicates that many people entering the homeless system are coming from overcrowded situations, and also that these individuals are less likely to be captured in current official homelessness counts.
- Change over time: As housing costs have increased, so have rates of overcrowded housing. While some cultures may choose to live in multi-generational homes that could be considered overcrowded, housing prices and lack of affordable units has also caused people to double-up or utilize non-bedroom areas of homes.[57] Since 2017, the proportion of renters in overcrowded housing has increased slightly, from 5.8% to 6.1%. This model assumes that overcrowding will continue to increase in the short-term and level out over time as there are modest improvements in affordable housing in the long run.

| Year | Proportion overcrowded |
|---|---|
| Base through year 10 | +0.1% per year |
| Years 11 to end year | Stagnant at year 10 rate |

**Percent without a high school diploma**

- Data source: American Community Survey Table S1501; Educational Attainment
- Variable: Proportion with less than high school diploma
- Incidence rate of homelessness: 0.5%-1%, based on regression coefficients from previous studies
- Rationale for inclusion: Level of education has been linked to homelessness in prior studies. Feedback from stakeholders indicated that those who experience homelessness are often those in low-wage jobs, which is highly correlated with educational attainment.
- Change over time: High school graduation rates in Washington are improving.[58] This model assumes that rates will continue to increase in the short term and level out over time.

| Year | Proportion with no high school diploma |
|---|---|
| Base through year 3 | Current levels |
| Years 4 through 5 | -3% without graduating |
| Years 6 through 10 | -5% without graduating |
| Years 11 to end year | Stagnant at years 6-10 rate |

**Severe rent burdens (percentage of household income spent on rent)**

- Data source: American Community Survey Table B25070; Gross Rent as a Percentage of Household Income in the Past 12 Months
- Variable: Percentage of households paying more than 50% towards rent
- Incidence rate of homelessness: 2.753%-2.919%, estimated from regression coefficients in prior studies[59]

---

[57] Kole, K. (2022). Housing Vouchers Reduce Residential Crowding. *Journal of Housing Economics, 55,* https://www.sciencedirect.com/science/article/pii/S1051137721000759

[58] Came, D. (2018). Graduation and Dropout Statistics. Prepared by the Washington Superintendent of Public Instruction. ; Came, D. (2019). Graduation and Dropout Statistics. Prepared by the Washington Superintendent. https://www.k12.wa.us/sites/default/files/public/communications/2019-01-GraduationDropoutStatistics.pdf

[59] Edimo, D. and R. Lynn-Greene (2020). Technical Addendum: Yes, We Can Predict Homelessness in California. Prepared by Abundant Housing LA, https://abundanthousingla.org/technical-addendum-yes-we-can-predict-homelessness-in-california/

- Rationale for inclusion: Rent burden has been a statistically significant predictor of homelessness in previous studies.[60] Feedback from stakeholders indicated that housing costs were a driving force of homelessness in Washington.
- Change over time: Although housing costs throughout Washington have drastically increased, the proportion of the renter population who are severely rent burdened has remained between 22% and 23% since 2017. This model assumes that severe rent burden will remain stagnant over time.

**Receipt of cash benefits**

- Data source: Temporary Assistance for Needy Families (TANF) Caseload; Washington Office of Financial Management; Economic Services Administration of the Washington State Department of Social and Health Services
- Variable: Average percentage of population receiving TANF; TANF caseloads are provided as a total across the state. County proportions were calculated by applying the percentage of Medicaid cases by county to the TANF caseload. It is assumed that any barriers to applying for TANF, such as the accessibility of social service offices in the county, would also apply to Medicaid. With very few exceptions, any TANF-eligible household would also be eligible for Medicaid.
- Incidence rate of homelessness: 3%-4%, estimated based on regression coefficients from prior studies[61]
- Rationale for inclusion: Cash assistance has been a statistically significant correlate of homelessness in prior studies. Income limits for cash assistance programs are near poverty levels and often include the most vulnerable households with few to no resources.
- Change over time: TANF caseload counts have increased slightly year over year, in line with population growth. This model assumes the proportion of the population receiving TANF remains the same.

**Unemployment**

- Data source: Washington Economic Security Department
- Variable: Unemployment rates by county
- Incidence rate of homelessness: 4-5%, based on incidence from prior studies
- Rationale for inclusion: Unemployment has been a statistically significant risk factor for homelessness in previous studies. King County's PIT reports show job loss as a leading cause of homelessness. This variable is only applied to King and Pierce Counties, as past studies have shown a significant effect only in high-cost continuums of care.
- Change over time: Unemployment is highly variable and can be impacted by a number of political, social, economic and other factors. This model assumes the March 2022 unemployment rate for the duration of the projection, though recognizing that economic shifts that will impact this statistic are likely over the course of this timeframe.

**Variables that were not included:**

- Feedback from stakeholders indicated that housing scarcity is a driving force of homelessness. However, this is significantly correlated with housing cost burden and was therefore not included separately in the model. Similarly, some past studies have found gross rent to be correlated with

---

[60] Edimo, D. and R. Lynn-Greene (2020). Technical Addendum: Yes, We Can Predict Homelessness in California. Prepared by Abundant Housing LA, https://abundanthousingla.org/technical-addendum-yes-we-can-predict-homelessness-in-california/; Nisar, H. (2019). Market Predictors of Homelessness. Prepared by the U.S. Department of Housing and Urban Development, https://www.huduser.gov/portal/sites/default/files/pdf/Market-Predictors-of-Homelessness.pdf

[61] Nisar, H. (2019). Market Predictors of Homelessness. Prepared by the U.S. Department of Housing and Urban Development, https://www.huduser.gov/portal/sites/default/files/pdf/Market-Predictors-of-Homelessness.pdf

homelessness. The Monte Carlo model relies on proportions of the population in a given category, which cannot accommodate the inclusion of gross rent.

- Black, Indigenous and other people of color are overrepresented in homelessness. Studies that have used race alone as a correlate of homelessness have mixed results, with some studies finding a significant correlation and others not. A recent HUD study[62] found some correlation between certain races, specifically Black and Latino, and changes in homelessness. While this is further evidence of inequality, these findings were also correlated with environmental changes in communities, such as population change and price increases that are also accounted for in this model. Additionally, Black, Indigenous and other people of color experience structural racism in other ways that are included in this model, such as higher rates of foster care, incarceration and evictions.
- The model does not include an adjustment for people who may have multiple risk factors for homelessness. It is likely that some people who fall into homelessness have more than one risk factor, and are thus double counted in this model. However, reasons for homelessness are complex and people will become homeless for reasons not included in this model, such as fleeing domestic violence, and are not counted in this projection. It is assumed that these are roughly equivalent. By not adjusting for those with multiple risk factors, this at least partially accounts for those who may experience homelessness due to a cause not accounted for within the model.

**Applying the Monte Carlo model**

The variables in the Monte Carlo model described above produce an estimate of the number of people who become newly homeless in a given year. These projections model total beds needed. In any given year, not all people experiencing homelessness are able to obtain permanent housing, meaning that the projection must account for homelessness carried over from the previous year. To accomplish this, steps outlined below were applied. These tables illustrate the process using HMIS data for counties with low, average and high emergency housing needs.

The final calculation for total emergency housing beds is:

**[((prior year homeless persons count – positive exits) + new homelessness) * length of stay]**

This model assumes that system performance improves slightly over time, as outlined below. However, performance improvement was capped at 80% positive exits and a 30-day length of stay based on current estimates of time needed to adequately house and stabilize a household in crisis. If a county's baseline performance exceeded these caps, then their performance remained the same as baseline throughout the duration of the projection period.

| Year | Positive system exits |
|---|---|
| Base through year 5 | Current system performance |
| Years 6 through 10 | +1% positive exits, -10 days length of stay |
| Years 11 through 15 | +3% positive exits, -20 days length of stay |
| Years 15 to end year | +5% positive exits, -30 days length of stay |

[62] Nisar, H et al. (2019). Market Predictors of Homelessness. HUD PD&R. https://www.huduser.gov/portal/publications/Market-Predictors-of-Homelessness.html

1. Begin with the base count of homelessness from the HMIS or Snapshot baseline counts, as described in the sections above. This table illustrates the HMIS count. For the Snapshot baseline count, the "Total Persons After Adjustment" would be the total annual count from the Snapshot report.

| County | Unduplicated HMIS count 2020 | Bed coverage rate | Bed coverage rate adjustment factor to HMIS count | Total persons after adjustment |
|---|---|---|---|---|
| Columbia | 61 | 44% | 2.27273 | 139 |
| Spokane | 8,184 | 60% | 1.66667 | 13,640 |
| King | 36,457 | 75% | 1.33333 | 48,609 |

2. Using the percentage of positive exits from the homeless system, deduct those in the prior year that were housed.

| County | Total persons after adjustment | Base rate of positive exits | Number of people exited | Number of people carried to the next year |
|---|---|---|---|---|
| Columbia | 139 | 100% | 139 | 0 |
| Spokane | 13,640 | 46% | 6,274 | 7,366 |
| King | 48,609 | 39% | 18,958 | 29,651 |

3. Add new homeless from the Monte Carlo model.

| County | Number of people carried to the next year | Year 1 projection: new homelessness* | Total people experiencing homelessness in year 1 projection |
|---|---|---|---|
| Columbia | 0 | 29 | 29 |
| Spokane | 7,366 | 3,797 | 11,163 |
| King | 29,651 | 22,784 | 52,435 |

*This example is using 2044 medium series projection data.

The process of Steps 2 and 3 repeat until the final year of the projection.

4. Adjust for system flow by using the average length of time homeless.[63] Since not every person in need of shelter will remain homeless for the duration of the year, the number of people experiencing homelessness was adjusted by the average length of time homeless to determine the number of beds that need to be available to fully meet sheltering needs at any given point in time. The "System Flow Adjustment" is calculated by dividing the projected average length of time homeless, determined by current homeless system operations and the moderate improvement over time described above, and the number of days in a year (365).

[63] Length of stay homeless comes from the Washington State Homeless System Performance County Report Card: https://public.tableau.com/app/profile/comhau/viz/DRAFTWashingtonStateHomelessSystemPerformance_CountyReportCardSFY2019/ReportCard.

Although base year 2020 data was used for counts, 2019 length of stay data for each county was selected for this calculation and adjusted for modest system improvement. The COVID-19 pandemic that shut down many sectors of the economy in 2020 likely increased length of stay above typical levels, as landlords were not able to show units for most of the year.

| County | Average length of time homeless 2019 (days) | Projected average length of time homeless (days) | Final system flow adjustment (divide projected average length of time homeless by 365) |
|---|---|---|---|
| Columbia | 23 | 23 | 0.063014 |
| Spokane | 193 | 163 | 0.446575 |
| King | 389 | 359 | 0.9835616 |

5. Using the final count of homelessness from the projection, multiply that number by the "Final System Flow Adjustment" to create the estimate of emergency housing beds needed to meet the projected need.

| County | Final year count of people experiencing homelessness* | Final system flow adjustment | Total beds needed |
|---|---|---|---|
| Columbia | 27 | 0.063014 | 2 |
| Spokane | 9,368 | 0.446575 | 4,184 |
| King | 66,782 | 0.9835616 | 65,684 |

*This example is using 2044 medium series projection data.

6. To determine the level of need that is unmet by current resources, deduct the final bed estimate from the number of current shelter beds from the Housing Inventory Count.

| County | Final estimate of beds needed, 2044 | Estimated shelter beds, 2020 | Net new need, 2020-2044 |
|---|---|---|---|
| Columbia | 2 | 1 | 1 |
| Spokane | 4,184 | 1,192 | 2,292 |
| King | 65,684 | 6,068 | 59,616 |

**Model validation**

To test the accuracy of the Monte Carlo model described above, the model was run with data for years 2019 (to determine carry over into 2020) and 2020. Then we compared the model output to the baseline HMIS and Snapshot counts of actual homeless persons. This allowed a comparison of the projections produced by the Monte Carlo model to a known count of homelessness.

The counties in the table below were chosen to represent the model performance for counties with low, average, and high counts of homelessness. Broadly, the model is slightly above adjusted HMIS counts and below Snapshot counts for most counties. For counties with Snapshot counts that are significantly greater than HMIS counts, such as Thurston County, the model may be underestimating projected homelessness.

| County | 2020 HMIS actual count of persons | 2020 HMIS adjusted count of persons | 2020 Snapshot count of persons | 2020 Monte Carlo count of persons |
|---|---|---|---|---|
| Wahkiakum | 11 | 25 | 203 | 54 |
| Thurston | 3,585 | 4,121 | 12,395 | 5,027 |
| King | 36,457 | 48,609 | 50,438 | 50,080 |

| County | Monte Carlo difference from HMIS adjusted 2020 | Monte Carlo difference from Snapshot 2020 |
|---|---|---|
| Wahkiakum | +29 | -149 |
| Thurston | +906 | -7,368 |
| King | +1,471 | -358 |

# Permanent supportive housing needs projection methodology

PSH provides long-term rental assistance with voluntary supportive services. RCW 36.70A.030, updated with HB 1220 (2021), defines eligibility as those living with a complex physical or behavioral disabling condition who are homeless or at-risk of homelessness, prioritizing those who need comprehensive services to retain housing. The models described below outline how PSH needs were projected through the final planning year for each county.

Since PSH is permanent housing, these projections are considered a subset of the total 0-30% AMI housing needs. While some households in PSH may have incomes higher than 30% AMI, the majority of these households are likely to be in the 0-30% AMI bracket as this is where disability incomes would fall, and RCW 36.70A.030 requires PSH participants to have “complex and disabling” conditions and service needs. Therefore, these projections assume all PSH needs are among households with incomes of 0-30% AMI.

## Baseline (2020) number of people eligible for PSH

Similar to the emergency housing needs, the projections account for both current and ongoing needs. To determine current need, two models were developed to create a baseline estimate of people eligible for PSH using both HMIS and the Snapshot report from Commerce.

**HMIS model**

1) Create a base count of every person likely eligible for PSH in HMIS for each county in Washington using individuals who had a disabling condition or experienced chronic homelessness[64] as indicators. The below counties represent this process with low, average and high numbers of people likely eligible for PSH.

| County | Unduplicated HMIS count of likely PSH eligible 2020 |
|---|---|
| Garfield | 3 |
| Yakima | 946 |
| King | 14,722 |

2) Adjust for potential undercounts by using the CoC-bed coverage rate for emergency shelter, transitional housing and safe havens. The bed coverage not included in HMIS was assumed to be the adjustment factor needed to obtain an accurate count of need, meaning 100% bed coverage. The coverage rate for PSH specifically was not used because it applies to people who have already obtained housing rather than those in need of housing. The adjustment factor was calculated by dividing 1 by the bed coverage rate. This is the same calculation described in the "Baseline Emergency Housing" section.

| County | 2020 bed coverage | Bed coverage adjustment factor |
|---|---|---|
| Garfield | 19% | 5.2632 |
| Yakima | 81% | 1.2346 |
| King | 75% | 1.3333 |

   a) Apply the "Bed Coverage Adjustment Factor" to "Unduplicated HMIS Count of Likely PSH Eligible 2020" by multiplying the unduplicated persons count by the adjustment factor to determine the "Total Persons Likely PSH Eligible After Adjustment."

| County | Unduplicated HMIS count of likely PSH eligible 2020 | Bed coverage adjustment factor | Total persons likely PSH eligible after adjustment |
|---|---|---|---|
| Garfield | 3 | 5.2632 | 16 |
| Yakima | 946 | 1.2346 | 1,168 |
| King | 14,722 | 1.3333 | 19,629 |

**Snapshot model**

1) Begin with the total annual count of persons in the Snapshot report, as described in the "Baseline Emergency Housing" section. This is a total count of all persons experiencing homelessness based on the Snapshot reporting specifications methodology.

2) Using the annual Snapshot count of people experiencing homelessness, apply assumptions about how many individuals are likely to qualify for PSH based on disabling condition and chronic homelessness

[64] For the full definition of chronic homelessness, see this resource from HUD. https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-homeless-eligibility/definition-of-chronic-homelessness/

indicators. To do this, apply the proportion of those who are likely PSH eligible from HMIS to the Snapshot count.

| County | 2020 total persons in HMIS (unadjusted) | 2020 likely PSH eligible in HMIS (unadjusted) | Proportion likely PSH eligible | Snapshot annualized figure | Snapshot persons likely eligible for PSH |
|---|---|---|---|---|---|
| Garfield | 16 | 3 | 18.75% | 56 | 11 |
| Yakima | 2,949 | 946 | 32.0786% | 12,018 | 3,855 |
| King | 36,457 | 14,722 | 40.3818% | 50,438 | 20,368 |

## Projected needs for PSH

As with emergency housing, Commerce used Monte Carlo simulations to project needs for PSH. The models assume each person in need of PSH will stay in emergency housing for some period prior to moving into PSH as a permanent housing option because a component of the definition of those in need of PSH is those who experience or are at-risk of homelessness. The PSH projected needs in this model are based on chronic homelessness, as it is a measure for the frequency and duration of an individual's experience of homelessness, and disabling conditions, as an indicator for supportive service need.

The Monte Carlo model for emergency housing needs produces ranges of projected homelessness based on different possible incidence rates of each risk factor. For each of these possible estimates, the PSH model creates a range of the number of people likely to experience either chronic homelessness or a disabling condition based on the proportion of people currently experiencing chronic homelessness in each county. Like emergency housing, the median of the ranges produced by the Monte Carlo model are used as the final projection.

The first of two risk factors in this model is chronic homelessness. Chronic homeless data was obtained through the Commerce HMIS system for each county and used in the model as a proportion of all people experiencing homelessness based on current rates. This model estimates that between 85% and 90% of people experiencing chronic homelessness would be best served in PSH.[65] As people remain homeless for longer periods of time, health can decline and needs can become more complex, thus requiring PSH.[66]

In the housing need projections from Commerce, PSH is considered a subset of “net new need” of 0-30% AMI housing. In a small number of counties, the net new need for extremely low-income housing was less than the projected need for PSH. This is due to a combination of low population growth in these counties, the amount of existing affordable housing stock and a lack of current PSH housing. Within the HAPT, county and jurisdiction allocations for PSH are capped at the total net new housing need. "Appendix B: Emergency housing and PSH projections" includes the number of projected PSH units not capped at net new need. Counties where

[65] These percentages are based on rates of housing stability for people experiencing chronic homelessness and served in PSH programs in prior studies. For a review of the literature, see Kizer, K. et al (2018). Permanent Supportive Housing: Evaluating the Evidence for Improving Health Outcomes Among People Experiencing Chronic Homelessness. Prepared for the National Academies. https://nap.nationalacademies.org/read/25133/chapter/1

[66] National Health Care for the Homeless. (2019). Health and Homelessness: What’s the Connection? https://nhchc.org/wp-content/uploads/2019/08/homelessness-and-health.pdf

the PSH projection exceeds net new need, which are marked within the HAPT, should consider conversion of existing housing stock to supportive units to meet this need.

**Chronic homelessness**

- Data source: HMIS
- Variable: Clients in HMIS who are chronically homeless
- Incidence rate of PSH: 85%-90%
- Rationale for inclusion: PSH is intended for those who may have difficulty maintaining housing stability without supports. Chronic homelessness is an indicator of repeated instability.
- Change over time: This model assumes that system performance improves slightly over time, thus reducing chronic homelessness, as shown in the table below. Chronic homelessness could improve up to 5%, but never decrease to 0% in counties that already had very low rates of chronic homelessness. For example, in Whitman County, only 2.67% of people experiencing homelessness are chronically homeless. This rate decreased through the length of the projection to 0.67%.

| Year | Proportion of chronically homeless individuals |
|---|---|
| Base through year 5 | Current proportions based on HMIS data |
| Years 6 through 10 | -1% chronic homelessness |
| Years 11 through 15 | -3% chronic homelessness |
| Years 16 to end year | -5% chronic homelessness |

The second risk factor is presence of a disabling condition. For each county, the percentage of people who were not chronically homelessness but experiencing a disabling condition was calculated based on HMIS data. The model estimates between 60% and 70% of this group would be best served in PSH.[67]

**Disabling conditions**

- Data source: HMIS
- Variable: Clients in HMIS who have a disabling condition but are not chronically homeless
- Incidence rate of PSH: 60%-70%
- Rationale for inclusion: PSH is intended for those who have disabling conditions.
- Change over time: This variable does not change over time as prevalence of disabling conditions is likely by numerous factors outside of the homeless service system.

**Applying the Monte Carlo model**

The model of chronic homelessness in the Monte Carlo model described above produces a projection of PSH needs. PSH is intended to be a permanent housing solution. To project the total need for PSH, the steps outlined below were applied. The table below illustrates the process using HMIS data for counties with low, average, and high PSH needs.

---

[67] Based on rates of housing stability for people experiencing homelessness with a disabling condition. For a review of the literature, see Peng et al. (2021). Permanent Supportive Housing with Housing First to Reduce Homelessness and Promote Health Among Homeless Populations with a Disability. Journal of Public Health Management Practices 26(5). https://www.ncbi.nlm.nih.gov/pmc/articles/PMC8513528/

The final calculation for total PSH units needed is:

**[(Base count – move outs) + new need for PSH] / household size = total need for PSH**

1) Begin with the baseline number of people eligible for PSH as described in the Baseline Count section above. The below example uses HMIS data, which includes the bed coverage adjustment factor to adjust for potential undercounts. Here, apply the "Bed Coverage Adjustment Factor" to "Unduplicated HMIS Count of Likely PSH Eligible 2020" by multiplying the unduplicated persons count by the adjustment factor to determine the "Total Persons Likely PSH Eligible After Adjustment."

| County | Unduplicated HMIS count of likely PSH eligible 2020 | Bed coverage adjustment factor | Total persons likely PSH eligible after adjustment (baseline PSH need) |
|---|---|---|---|
| Garfield | 3 | 5.2632 | 16 |
| Thurston | 1,238 | 1.1491 | 1,423 |
| King | 14,722 | 1.3333 | 19,628 |

2) Deduct a number of people for move-outs. PSH is intended to be permanent housing, and many people will remain in this housing for the duration of their lives. The model deducts 1.5% for mortality every year, based on Center for Disease Control (CDC) mortality rates. Some people will age in PSH or have their condition worsen and require more intensive care, such as nursing homes or in-patient hospital programs. The model assumes that 2% of PSH residents move out every year to more intensive solutions. "Moving On" programs are intended to encourage people living in PSH who have stabilized to move into non-supporting housing or other less intensive options. This model assumes that availability of affordable housing options improves slightly over time, increasing positive, voluntary "moving on" exits from PSH. The total percentage of people moving out, including from Moving On programs, is displayed below.

| Year | Total percentage moving out |
|---|---|
| Base through Year 5 | 4.5% (1.5% mortality, 2% more intensive solutions, 1% moving on) |
| Years 6 through 10 | 6.5% (1.5% mortality, 2% more intensive solutions, 3% moving on) |
| Years 11 through final year | 8.5% (1.5% mortality, 2% more intensive solutions, 5% moving on) |

Using the Year 1 total move-outs percentage, the below table provides an example of this calculation for sample counties with low, average and high needs for PSH.

| County | Baseline need for PSH | People moving out (year 1) | Year 1 carry over PSH need |
|---|---|---|---|
| Garfield | 16 | 1 | 15 |
| Thurston | 1,423 | 64 | 1,359 |
| King | 19,628 | 883 | 18,745 |

3) Using the Monte Carlo model, add new need for PSH for the year.

| County | Year 1 carry over PSH need | New need (year 1; medium population projection) | Year 1 total number of people likely eligible for PSH |
|---|---|---|---|
| Garfield | 15 | 1 | 16 |
| Thurston | 1,359 | 339 | 1,698 |
| King | 18,745 | 4,353 | 23,098 |

Steps 2 and 3 continue repeating for the duration of the projection.

4) Determine the number of additional PSH units to meet the need.

a) First, to determine the level of need that is met by current resources, apply assumptions regarding vacancy rates to total number of PSH beds in the housing inventory count. It is assumed that the majority of PSH beds are filled and only 3% of beds are vacant[68] in every community.

| County | 2020 total PSH beds | Estimated available PSH beds |
|---|---|---|
| Garfield | 0 | 0 |
| Thurston | 180 | 5 |
| King | 6,201 | 186 |

b) Deduct the estimated number of PSH beds available from the total number of persons likely eligible for PSH. This is the number of additional PSH beds to meet the need. Household size assumptions are not applied to PSH because only one household member needs to have a qualifying need. Applying a household size to reduce the number of units assumes that all members of the household have a qualifying condition. Therefore, the number of PSH beds needed is estimated to be the unit count.

| County | Likely eligible for PSH (final year projection) | Estimated available PSH beds | Unmet PSH bed need |
|---|---|---|---|
| Garfield | 14 | 0 | 14 |
| Thurston | 4,323 | 5 | 4,318 |
| King | 54,755 | 186 | 54,569 |

[68] Here, the vacancy rate is being used to estimate current supply available to meet need. Unlike housing needs by income level, PSH need does not include a measure of vacancy for movement between units.

c) To convert the total number of beds needed into units needed, divide by household size. The average household size in each county was calculated by dividing the total number of people in HMIS by the total number of households in HMIS.

| County | Unmet PSH bed need | Average household size | Net new need for PSH units (2044 HMIS medium population projection) |
|---|---|---|---|
| Garfield | 14 | 2.2857 | 6 |
| Thurston | 4,318 | 1.3292 | 3,249 |
| King | 54,569 | 1.2704558 | 42,952 |

**Model validation**

To test the accuracy of the Monte Carlo model described above, Commerce ran the model with data for years 2019 through 2020 to count only persons likely eligible for PSH and compared it to HMIS actual and adjusted numbers. Projections are generally between the actual and adjusted counts for HMIS. Like the emergency housing model, in counties where the Snapshot was significantly greater than HMIS counts,[69] the Monte Carlo model underestimates need for PSH.

| County | 2020 HMIS actual likely PSH eligible persons | 2020 HMIS adjusted likely PSH eligible persons | 2020 Snapshot likely PSH eligible persons | 2020 Monte Carlo likely PSH eligible persons |
|---|---|---|---|---|
| Garfield | 3 | 16 | 11 | 4 |
| Thurston | 1,238 | 1,423 | 4,280 | 1,581 |
| King | 14,722 | 19,629 | 20,368 | 19,127 |

| County | Monte Carlo difference from HMIS adjusted 2020 | Monte Carlo difference from Snapshot 2020 |
|---|---|---|
| Garfield | -12 | -7 |
| Thurston | +158 | -2,699 |
| King | -502 | -1,241 |

# Emergency housing and PSH projections

Appendix B: Emergency housing and PSH projections includes tables that show projected need by 2044 for emergency housing and PSH following the projection methods described above, as well as homelessness per capita and the number of existing PSH beds included in the calculations.

[69] The Snapshot report uses administrative data to measure homelessness in Washington. This document provides an overview of the Snapshot and outlines how the homelessness flag in the report is defined. It counts clients who receive public assistance, Medicaid-funded medical care or housing services.
https://deptofcommerce.app.box.com/s/hnpkedlkifogzx8i892cu0k34nzsrbtp/file/1079247145019

# Allocating housing needs

Once jurisdictions have decided how much they plan to grow over the next twenty years (based on OFM population projections) and used that growth projection in the HAPT to determine their future housing needs, the next step is to divide the countywide housing needs between the cities, towns and unincorporated county.

Commerce recommends that counties allocate projected housing needs using a similar process as the locally established process to allocate population targets, working in consultation with cities and towns. This process of allocating population may be through a council of governments, a regional council or an organization of representatives from every jurisdiction within the county.[70]

Within the CPPs, Commerce recommends that jurisdictions document:

- The decision process used to allocate projected housing needs,
- A policy on how to allocate housing needs by income level,[71] and
- A policy on how to allocate housing needs for permanent supportive and emergency housing, if different from the policy for allocating housing needs by income level.

## Minimum standards for identifying and allocating projected housing needs

While counties and local jurisdictions can choose any method to allocate countywide projected housing needs, there are some minimum standards for identifying and allocating projected housing needs:

1) The jurisdiction must select a population target that is within the range of OFM's Low, Medium and High GMA Population Projection.

2) The county must use Commerce's Housing for All Planning Tool (HAPT) to identify housing need projections associated with the population target. The housing needs for each income level, PSH and emergency housing must be consistently derived from the same target population input using the HAPT.

3) Allocations must be consistent with any relevant countywide planning policies or multicounty planning policies that address housing.

4) The sum of all housing needs allocated to local jurisdictions in a county must be no less than the total projected countywide need. This should be true for each income level, PSH and emergency housing.[72] Within city limits, cities may choose to plan for more housing need particularly in the face of new middle housing and ADU laws, which result in more capacity.

---

[70] In the central Puget Sound Region, the Puget Sound Regional Council (PSRC) has established a regional framework for multi-county coordination to allocate population targets.

[71] Such policies should be consistent with RCW 36.70A.210 (3)(e): "Policies that consider the need for affordable housing, such as housing for all economic segments of the population and parameters for its distribution;"

[72] Note that Commerce's projected Net New Housing Needed for counties is calculated by subtracting the Estimated Housing Supply (2020) from the Total Future Housing Needed in the projection year. The Estimated Housing Supply (2020) includes only housing available for full time occupancy by residents. Commerce uses Census data to remove housing that is only used for recreational use (e.g., vacation homes or short-term rentals) or migrants, and therefore not available for full-time residence. Allocations of Net New Housing Needed should account for this baseline 2020 Estimated Housing Supply, as documented in the HAPT.

5) The allocation of housing needs to each local jurisdiction and the sum of housing needs to all jurisdictions should be documented in a public-facing summary document at the countywide level prior to the periodic update, such as an addendum to the countywide planning policies or a resolution adopted by all jurisdictions.

6) Each jurisdiction's allocation of projected housing needs by income level, PSH and emergency housing must be documented in their comprehensive plan housing element and consistently used in the comprehensive plan.

Within the minimum standards above, counties and their cities have the flexibility to choose:

1) What population target they choose to plan for within OFM's Low, Medium and High Population Projections.

2) How much growth and housing goes to each individual jurisdiction.

3) The percentage of housing need in each affordability level that goes to each individual jurisdiction.

## Relationship of allocated housing needs to local housing needs assessments

Housing markets are fundamentally regional, and housing affordability is a regional challenge. Therefore, addressing all housing needs requires a regionally coordinated approach. The GMA has long required local jurisdictions to work together to allocate projected countywide population growth. The housing element updates created greater specificity to ensure adequate housing capacity for the region's projected need at each income level.

Within this framework, localities have the authority to plan for how to accommodate their housing need allocations. Local policymaking can benefit from an assessment of local housing needs, barriers and opportunities. Analysis done for a local housing needs assessment, such as a recent Housing Action Plan, can be helpful for answering questions such as:

- What kinds of households need affordable housing at each income level? (e.g., families with kids, single workers, elderly residents, multi-generational families, etc.)
- What kinds of housing are most appropriate for meeting the needs of the local workforce?
- Are there racial disparities in housing opportunity and neighborhood choice?
- Are there areas at higher risk of displacement?

This kind of information can help to inform the development of policies and strategies for accommodating local housing need in a way that considers local circumstances.

## Methods for allocating housing needs to local jurisdictions

Counties may use any method for allocating housing needs to local jurisdictions as long as it is consistent with the minimum standards outlined in this guidance. Jurisdictions working in coordination with their counties are in the best position to identify and select an allocation method to meet countywide housing needs.

**Data available from Commerce**

Download the latest version of the Housing for All Planning Tool (HAPT) on the Commerce website: Updating GMA Housing Elements.

## Housing for All Planning Tool (HAPT)

Commerce's HAPT spreadsheet tool can assist counties and cities in the allocation process. The next section describes the HAPT and provides guidance for its use. The following section also discusses options for incorporating other criteria or policy objectives into the allocation process, either by refining HAPT outputs or using alternative methods.

If a county, working with its local jurisdictions, is not able to reach agreement on a plan for allocating housing needs in accordance with the minimum standards, Commerce recommends using "Method A" provided in the HAPT using each jurisdiction's share of countywide future population growth.

The Housing for All Planning Tool (HAPT) is an Excel spreadsheet tool available for download from the Commerce website. The tool has two primary functions:

- It provides customized countywide housing needs projections based on the selected county and population target.
- It supports the allocation of projected housing needs to individual jurisdictions within each county. This includes functionality to specify the share of total housing growth by jurisdiction, for alignment with adopted population growth targets, buildable land capacity and/or other criteria.

While counties are required to use the HAPT to identify projected housing needs associated with their chosen countywide population target, the use of this tool for allocation to local jurisdictions is optional.

The HAPT includes two different allocation methods. Both approaches meet the minimum standards described above. Here we provide an overview of the principles behind each allocation model and some illustrations of the allocation outputs.

## HAPT Method A: Same shares of net new housing need by income level

The first allocation method is based on four key principles:

- All countywide housing needs are accommodated through new housing production.
- Each jurisdiction is allocated their target share of the countywide growth.
- All jurisdictions are allocated the same percentage shares of their net new housing growth target by income level, including units for moderate, low, very low and extremely low-income households.
- Countywide PSH and emergency housing needs are allocated in proportion to the jurisdiction's share of countywide growth.

Exhibit 26 presents an example allocation of countywide housing needs using Method A for two jurisdictions. Jurisdiction 1 has a higher growth target and therefore has a larger allocation of need at each income band compared to Jurisdiction 2. However, both jurisdictions are allocated the same percentage shares of their total housing growth targets by income level. For example, in both jurisdictions 22.8% of their net new housing production is allocated to be at the 30-50% AMI level because 22.8% of the countywide net new housing need is at 30-50% AMI.

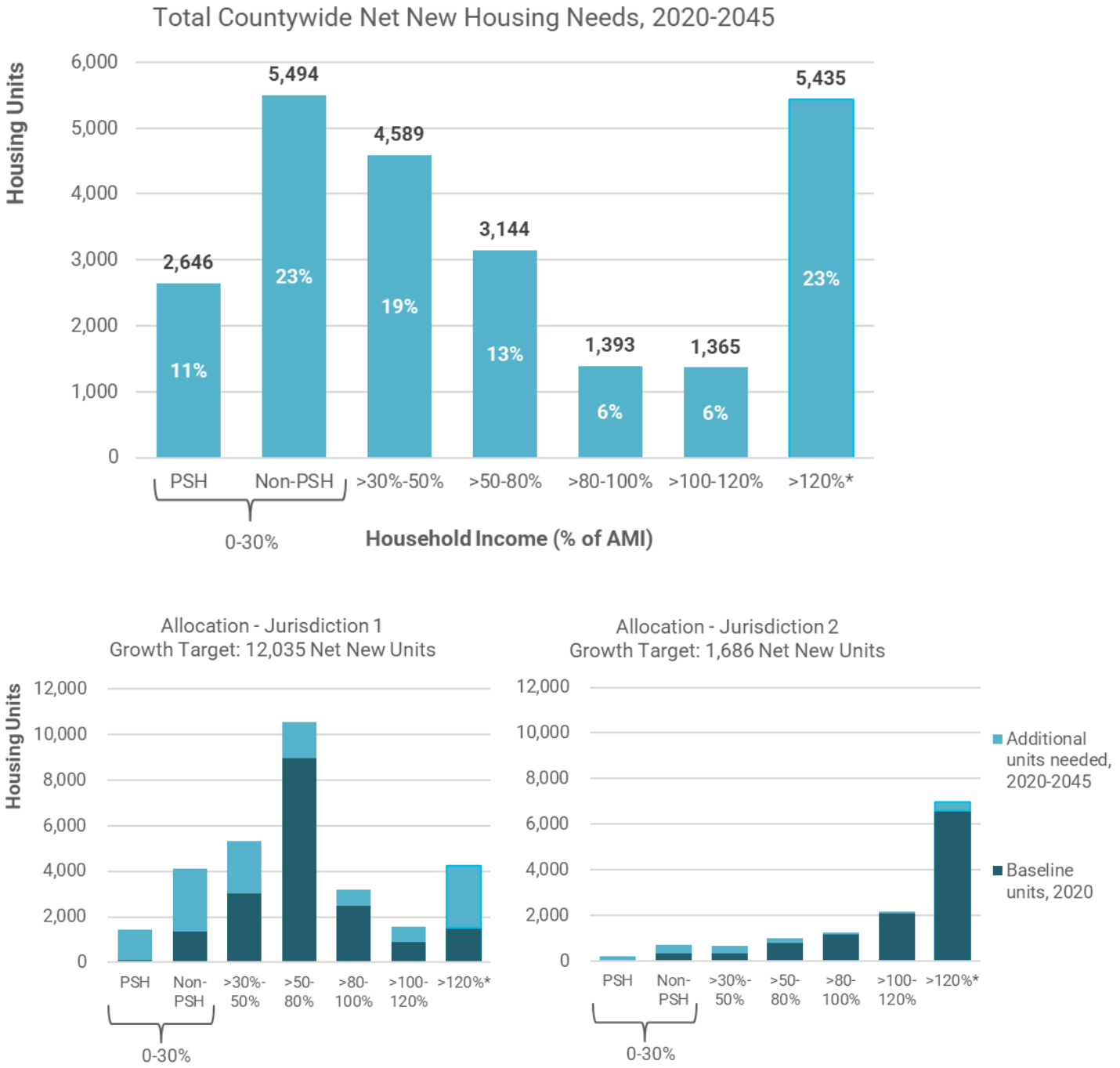
## Exhibit 26. Example HAPT Method A - Allocation for a hypothetical county and two jurisdictions

| Income level (% of AMI) | Countywide net new housing need, 2020-2045 | Percentage of countywide net new housing need, 2020-2045* | Allocation for Jurisdiction 1 – 15,000 growth target* | Allocation for Jurisdiction 2 – 2,000 growth target* |
|---|---|---|---|---|
| 0-30% (PSH) | 2,646 | 11.0% | 1,323 | 185 |
| 0-30% (Non-PSH) | 5,494 | 22.8% | 2,747 | 385 |
| >30-50% | 4,589 | 19.1% | 2,295 | 321 |
| >50-80% | 3,144 | 13.1% | 1,572 | 220 |
| >80-100% | 1,393 | 5.8% | 697 | 98 |
| >100-120% | 1,365 | 5.7% | 683 | 96 |
| >120% | 5,435 | 22.6% | 2,718 | 381 |
| Total* | 24,066 | 100% | 12,035 | 1,686 |

* Percentages may not sum to 100% due to rounding. Percentages do not show all decimal places; therefore, the allocations differ slightly from what can be calculated with the rounded percentages in the table.

Exhibit 27 presents the same data. The top chart shows total net new countywide housing needs through 2045 by income level, including the percentage of net new units needed at each income level. The following charts represent the allocated housing needs for Jurisdiction 1 and Jurisdiction 2. Each jurisdiction has a different baseline profile of housing units by affordability level and a different housing growth target. The baseline units in 2020 are shown in dark blue, while the allocation of net new housing needs are shown in light blue. In this allocation method, differences in baseline housing stock by affordability level have no impact on the allocation received. Instead, all jurisdictions are allocated the same percentage shares of their net new housing growth target by income level (e.g., both Jurisdiction 1 and 2 each get 22.8% of their net new housing production at the 30-50% AMI level).

## Exhibit 27. Example HAPT Method A - Allocation for a hypothetical county and two jurisdictions




The same method is used to allocate emergency housing needs. For example, if Jurisdiction 1 is receiving 15% of all net new housing production in the county, then they will also be allocated 15% of all countywide emergency housing needs.

## HAPT Method B: Allocation to align future housing supply

The second method for allocating net new housing needs by income level is based on a different set of assumptions. Method B is designed to highlight and address historic disparities in the stock of lower-cost housing within a county. The three principles underlying this method are:

- Each jurisdiction should be planning for the same percentage share of their total housing supply at each income level by the end of the planning period. Therefore, allocations of need by income level should account for differences in baseline (2020) housing supply by affordability level. Jurisdictions that have less affordable housing in 2020 should be allocated a greater share of projected affordable housing needs.
- Similarly, each jurisdiction should be planning for the same percentage share of their total housing supply in PSH and emergency housing by the end of the planning period.
- Allocations do not assume that all net new countywide housing needs will be met only through new housing production. Instead, some jurisdictions could receive "negative" allocations for affordability levels in which they are oversupplied compared to countywide needs.

With Method B, jurisdictions that currently have relatively less affordable housing are allocated a larger share, even if they have a smaller growth target. The goal is to address and begin to undo patterns of exclusion and increase housing choice and access. These calculations can also inform discussions about how to most equitably allocate needed housing.

Exhibit 28 shows an example allocation using Method B. The first part of the table calculates the percentage of total countywide housing needs in 2045 by income level (baseline units on the ground in 2020 + projected net new housing needs by income level). The second part applies these percentages to Jurisdiction 1, which is projected to have a total of 30,384 housing units in 2045 (18,351 baseline units in 2020 + 12,033 growth target units). The Total Housing Need in 2045 column just multiplies the total projected housing units (30,384) by the Countywide Percentage of Total Housing Need in 2045 to calculate their share of countywide housing needs in 2045. Then it subtracts Baseline Units, 2020 by income level to calculate the Net New Units Needed, 2020-2045.

## Exhibit 28. Example HAPT Method B allocation – Jurisdiction 1

| | Countywide | | | | Jurisdiction 1 (growth target: 12,033) | | |
|---|---|---|---|---|---|---|---|
| Income level (% of AMI) | Baseline units, 2020 | Net new housing need, 2020-2045 | Total housing need in 2045 | Percentage of total housing need in 2045 | Total housing need in 2045* | Baseline units, 2020 | Net new units needed, 2020-2045 |
| 0-30% (PSH) | 114 | 2,646 | 2,760 | 2.0% | 621 | 106 | 515 |
| 0-30% (Non-PSH) | 4,123 | 5,494 | 9,617 | 7.1% | 2,165 | 1,346 | 819 |
| >30-50% | 11,737 | 4,589 | 16,326 | 12.1% | 3,675 | 3,030 | 645 |
| >50-80% | 33,907 | 3,144 | 37,051 | 27.4% | 8,340 | 8,960 | ***-620*** |
| >80-100% | 19,338 | 1,393 | 20,731 | 15.4% | 4,667 | 2,496 | 2,171 |
| >100-120% | 12,078 | 1,365 | 13,443 | 10.0% | 3,026 | 879 | 2,147 |
| >120% | 29,617 | 5,435 | 35,052 | 26.0% | 7,890 | 1,534 | 6,356 |
| Total* | 110,914 | 24,066 | 134,980 | 100% | 30,384 | 18,351 | 12,033 |

* Totals may vary slightly from sum of rows due to rounding. Percentages do not show all decimal places, therefore the Total Housing Need in 2045 differs slightly from what can be calculated with the rounded percentages in the table.

In most cases, Net New Units Needed is a positive number since the Total Housing Need in 2045 is higher than the Baseline Units in 2020. However, in this example, the Baseline Units is higher than the Total Housing Need at the >30-50% AMI income level. As a result, there is a negative value, indicating that Jurisdiction 1 already has more than enough housing affordable to >30-50% AMI for its 2045 targets. In this case, Jurisdiction 1 may choose to consider strategies that make this existing housing stock affordable to lower-income households since there is a large need at the lower 0-30% AMI income level and new construction can be much more expensive than alternative strategies. These strategies could include supporting non-profits to purchase existing housing or coordinating with housing authorities to provider vouchers offering units at affordable rents to income-qualified households.

Note that RCW 36.70A.070(2)(c) also requires that each jurisdiction document that they have sufficient capacity to accommodate future housing needs at each income level. The jurisdiction would need to show sufficient capacity for growth on vacant or redevelopable parcels with appropriate zoning for all the new housing needed, as described in Commerce's Land Capacity Guidance.[73] That guidance also describes the option for considering accessory dwelling unit (ADU) capacity if changes to development regulations make it easier to build them or subdivide existing housing into separate ADUs or housing units.

Exhibit 29 provides a second example of a Method B allocation. This example includes the same countywide need as in Exhibit 28. However, the housing supply in Jurisdiction 2 tends to be much less affordable than

[73] Under allocation Method B, a jurisdiction with negative allocations at some income bands and positive allocations in others will need to show capacity that is in excess of their housing growth target for the 20-year planning period. So long as the new capacity is planned within urban growth areas and urban growth area boundaries are not adjusted, the jurisdiction should be consistent with state planning goals. Any adjustments to urban growth boundaries in a scenario where capacity would exceed the 20-year planning period growth could be inconsistent with RCW 36.70A.130(3)(c) and therefore are not advised if Method B is used as an allocation method.

Jurisdiction 1, with a majority of units only being affordable to households with incomes of >120% AMI. The growth target in Jurisdiction 2 is also much lower: only 1,686 units. These characteristics impact the allocation outcomes. Using Method B, Jurisdiction 2 would need to add over 5,690 net new units for income levels below 100% AMI. This far exceeds its total growth target of only 1,686 net new units. On the other hand, Jurisdiction 2 would also need to reduce its supply of units affordable above 100% AMI. In other words, Jurisdiction 2 would need to find ways to make some of its existing housing supply above 100% AMI affordable to lower-income households.

## Exhibit 29. Example HAPT Method B allocation – Jurisdiction 2

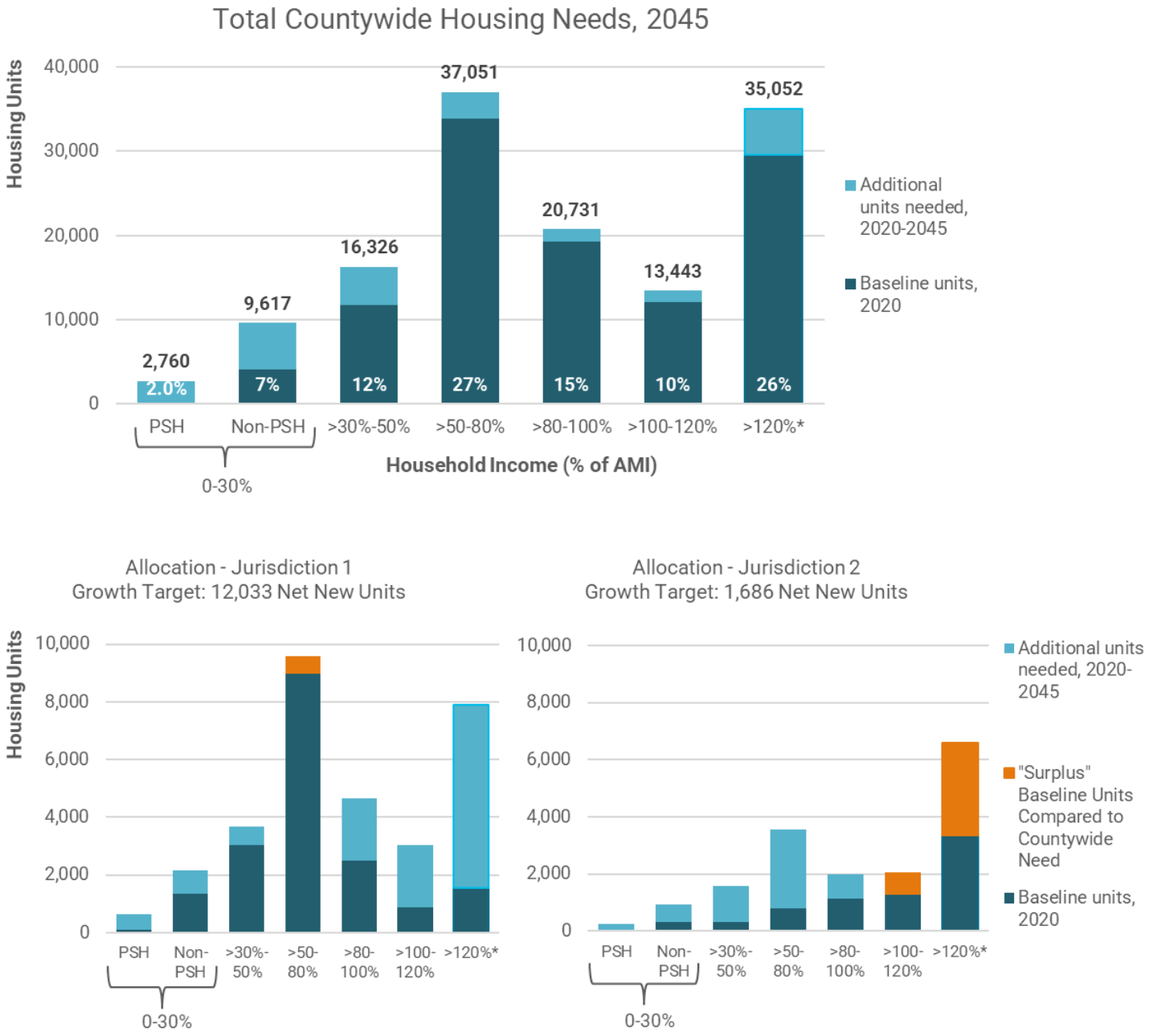
| | Countywide | | | | Jurisdiction 2 (growth target: 1,686) | | |
|---|---|---|---|---|---|---|---|
| **Income level (% of AMI)** | **Baseline units, 2020** | **Net new housing need, 2020-2045** | **Total housing need in 2045** | **Percentage of total housing need in 2045** | **Total housing need in 2045*** | **Baseline units, 2020** | **Net new units needed, 2020-2045** |
| 0-30% (PSH) | 114 | 2,646 | 2,760 | 2.0% | 265 | 0 | 265 |
| 0-30% (Non-PSH) | 4,123 | 5,494 | 9,617 | 7.1% | 922 | 331 | 591 |
| >30-50% | 11,737 | 4,589 | 16,326 | 12.1% | 1,565 | 331 | 1,234 |
| >50-80% | 33,907 | 3,144 | 37,051 | 27.4% | 3,551 | 788 | 2,763 |
| >80-100% | 19,338 | 1,393 | 20,731 | 15.4% | 1,987 | 1,150 | 837 |
| >100-120% | 12,078 | 1,365 | 13,443 | 10.0% | 1,288 | 2,073 | ***-785*** |
| >120% | 29,617 | 5,435 | 35,052 | 26.0% | 3,359 | 6,578 | ***-3,219*** |
| Total* | 110,914 | 24,066 | 134,980 | 100% | 12,937 | 11,251 | 1,686 |

*Totals may vary slightly from sum of rows due to rounding. Percentages do not show all decimal places; therefore, the Total Housing Need in 2045 differs slightly from what can be calculated with the rounded percentages in the table.

Exhibit 30 visualizes the outcomes of a Method B allocation. The first chart shows total countywide housing needs as a combination of baseline (2020) units and additional net new housing needs from 2020-2045. It also shows for each income level the percentage share of total countywide housing needs in 2045. The following two charts show the outcomes for Jurisdictions 1 and 2. Negative allocations are shown in orange as "Surplus" Baseline Units Compared to Countywide Need.[74]

[74] A "surplus" refers to a situation where the number of units provided in 2020 at an income level is already greater than its share of housing at that income level in the projection year (2045 in this case).

## Exhibit 30. Example HAPT Method B allocation for a hypothetical county and two jurisdictions




* While the HAPT accounts for net new housing needs at all income bands, including needs for above moderate-income households (>120% AMI), the updated housing element requirements include no requirements for identifying and analyzing housing needs at this income level within a jurisdiction's inventory of current and projected housing needs.

Method B applies the same approach for allocating emergency housing needs. Jurisdictions that already provide a relatively larger share of emergency housing would need to provide a relatively smaller proportion of net new beds to meet their total allocation, compared to other jurisdictions. As such, this method counteracts historical patterns of exclusion that concentrate emergency housing and shelters in some communities. By allocating emergency housing needs based on each jurisdiction's share of total projected housing units, the goal of this method is to have all jurisdictions in the county contribute to ending homelessness.

## Comparison of Method A and Method B emergency housing allocation

As noted above, Method A and Method B allocate emergency housing differently. Method A allocates net new emergency housing need based on each jurisdiction's percentage share of countywide housing growth. Method B allocates net new emergency housing need based on each jurisdiction's percent share of countywide target housing units in the projection year of 2045. Exhibit 31 and Exhibit 32 show how emergency housing allocations are calculated using each method.

### Exhibit 31. Shares of countywide housing growth and target units used for emergency housing allocation

| | Baseline units, 2020 | Net new units needed* | Percentage share of countywide housing growth*,** | Total housing need in 2045 | Percent share of countywide total housing need in 2045 |
|---|---|---|---|---|---|
| Countywide | 110,914 | 24,066 | NA | 134,980 | NA |
| Jurisdiction 1 | 18,351 | 12,033 | 50.0% | 30,384 | 22.5% |
| Jurisdiction 2 | 11,251 | 1,686 | 7.0% | 12,936 | 9.6% |

*Percentages do not show all decimal places. Therefore, the Net New Units Needed differs slightly from what can be calculated with the rounded percentages in the table.
**This percentage is the share of the countywide housing need entered in the blue cells of Allocation Method A. A jurisdiction may choose to use a value other than the share of countywide housing growth, such as the share of countywide land capacity.

### Exhibit 32. Example comparison of Method A and Method B emergency housing allocation

| | Baseline emergency housing units | Total emergency housing need in 2045 | Net new housing needed |
|---|---|---|---|
| Countywide emergency housing need | 400 | 2,400 | 2,000 |

### Method A emergency housing allocation

| | Percentage share of countywide housing growth | Countywide net new emergency housing need | Allocated net new emergency housing need in 2045* |
|---|---|---|---|
| Jurisdiction 1 | 50.0% | 2,000 | 1,000 |
| Jurisdiction 2 | 7.0% | 2,000 | 140 |

*Percentages do not show all decimal places. Therefore, the Allocated Net New Emergency Housing Need in 2045 may differ slightly from what can be calculated with the rounded percentages in the table.

### Method B emergency housing allocation

| | Percent share of countywide target housing units | Countywide total emergency housing need | Total emergency housing need in 2045* | Baseline emergency housing units (2020) | Net new emergency housing need in 2045 |
|---|---|---|---|---|---|
| Jurisdiction 1 | 22.5% | 2,400 | 540 | 350 | 190 |
| Jurisdiction 2 | 9.6% | 2,400 | 230 | 50 | 180 |

*Percentages do not show all decimal places. Therefore, the Total Emergency Housing Need in 2045 may differ slightly from what can be calculated with the rounded percentages in the table.

## How to use the HAPT

The HAPT spreadsheet model includes instructions to walk novice Excel users through the process of creating unique allocations for a selected county. A summary of these instructions is provided here.

**Part 1: Select countywide housing needs projections**
Begin on the "County Projections - START HERE" tab (see screenshot in Exhibit 33). There are three selection menus on this tab:

- Step 1: Select a county
- Step 2: Select a projection year
- Step 3: Select a population target

After selecting a county and projection year, OFM population projections will appear in Table 1. For PSRC counties, an additional projection associated with Vision 2050 will appear in this same table. In Step 3, you must enter a countywide population target within the OFM range for the projection year.

After making valid selections for all three parameters, Table 2 displays a summary of countywide projected housing needs by income level based on the user selections.

**Part 2: Review and adjust allocations**
The next step is to proceed to the Allocation_Method_A tab, which is shown in Exhibit 34. Here you enter the percentage shares of new housing growth that are planned to occur within each jurisdiction. These shares of growth should reflect the adopted or agreed upon shares of population or housing growth as coordinated by the county with its constituent jurisdictions. In the left-most column, the user can input these percentages for each individual jurisdiction into the blue cells. User inputs are limited to two decimal points. These percentages must add up to 100%, and if they do not, the tool provides feedback for how many percentage points need to be added or subtracted to reach a sum of 100%. Once the percentages add up to 100%, the summing cell turns green and the message “Met Target” appears. These same percentages are mirrored on the Allocation_Method_B tab and are inputs to the allocation for both methods.

The allocation numbers for >120% AMI are shown with gray shading to remind the user that there are no requirements to allocate units for those above-moderate income housing needs. The tool shows these numbers to ensure that the sum of all income levels (including PSH) add up to the total housing needs by income level. Emergency housing unit needs are allocated separately; these units are for temporary housing needs and are not included in the total housing needs by income level.

Exhibit 35 shows summary charts that also appear in the Allocation_Method_A. The charts on the left visually compare the distribution of baseline (2020) units by affordability level for each jurisdiction and countywide. The charts on the right show what the distribution of total housing units would be in each jurisdiction if housing is built to address all allocated housing needs. In this example, it shows that there is still a great deal of variation between jurisdictions in 2046, as would be expected given the large disparities in baseline housing supply.

The HAPT has a separate tab showing the results for Method B. A screenshot is shown in Exhibit 36 for the same county and cities. The format and functionality of this page is the same as for Method A. However, the

### Downloading the HAPT

Download the Housing for All Planning Tool (HAPT) on the Commerce website: Updating GMA Housing Elements.

Once downloaded, select the “Enable Editing” and “Enable Content” buttons at the top of the file if prompted before you follow the steps here.

allocation results are quite different, due to the difference in methodology. This table shows that in some cases the allocation is negative (shown in red).[75]

[75] This happens when the Estimated Units (2020) is higher than the jurisdiction's share of total countywide housing needs in 2046.

## Exhibit 33. Screenshot of the HAPT "County Projections" tab with Chelan County selected

**Housing Needs Projections for Selected County, Projection Year, and Population Target**

**Complete Steps 1, 2, and 3 to access countywide projections**

| Step 1 |
|---|
| Select a County |
| Chelan ✓ |

| Step 2 |
|---|
| Select a Projection Year |
| 2046 ✓ |

| Step 3 |
|---|
| Enter Population Target in Range |
| 95,670 ✓ |

**Table 1: OFM GMA Population Projections, 2046**

**Chelan County Projected Population, 2046**

| | Low | Medium | High |
|---|---|---|---|
| Projected Population (2046) | 81,113 | 95,151 | 119,353 |

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

**Chelan County**

**Population Target = 95,670**

| | | Affordability Level (% of Area Median Income) | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| | | 0-30% | | | | | | | |
| | Total | Non-PSH | PSH | 30-50% | 50-80% | 80-100% | 100-120% | 120%+ | Emergency Housing/Shelter Beds |
| Total Future Housing Needed (2046) | 41,687 | 3,024 | 978 | 5,069 | 8,764 | 5,432 | 4,643 | 13,777 | 690 |
| Estimated Housing Supply (2020)* | 30,931 | 1,746 | 54 | 3,272 | 6,970 | 4,554 | 3,837 | 10,497 | 384 |
| Net New Housing Needed (2020-2046) | 10,757 | 1,278 | 924 | 1,797 | 1,794 | 878 | 806 | 3,280 | 306 |

** Note: Supply of PSH in 2020 is beds. However, projections of Net New Housing Needed (2020-2046) are in housing units. See Overview tab for details.*

**Instructions:**

- **Step 1:** Select a county; **Step 2:** select projection year
- *Next, Table 1 will present OFM GMA population projections for your county and year inputs. For PSRC counties, selecting projection year 2044 will also present VISION 2050 population projections.*
- **Step 3:** Enter your county's population target. This is the total population projected for the selected year. The value must be within the range shown in Table 1.
- *After completing Step 3, Table 2 will present projected countywide housing needs based on the user inputs.*

Note: Example population target is selected for illustration purposes only.

## Exhibit 34. Screenshot of the HAPT Method A allocation page

**Chelan County**

**Projection Year: 2046**

**Population Target = 95,670**

| | | Permanent Housing Needs by Income Level (% of Area Median Income) | | | | | | | | Emergency Housing Needs (Temporary) |
|---|---|---|---|---|---|---|---|---|---|---|
| | | | 0-30% | | | | | | | |
| | | Total | Non-PSH | PSH | >30-50% | >50-80% | >80-100% | >100-120% | >120% | |
| **Countywide Estimated Housing Supply (2020)** | | 30,930 | 1,746 | 54 | 3,272 | 6,970 | 4,554 | 3,837 | 10,497 | 384 |
| **Countywide Additional Units Needed (2020-2046)** | | 10,757 | 1,278 | 924 | 1,797 | 1,794 | 878 | 806 | 3,280 | 306 |
| **Sum of Allocation to Jurisdictions (from User Inputs)** | | 10,757 | 1,278 | 924 | 1,797 | 1,794 | 878 | 806 | 3,280 | 305 |

**User Input - % Share of County Population Growth. Values must sum to 100%**

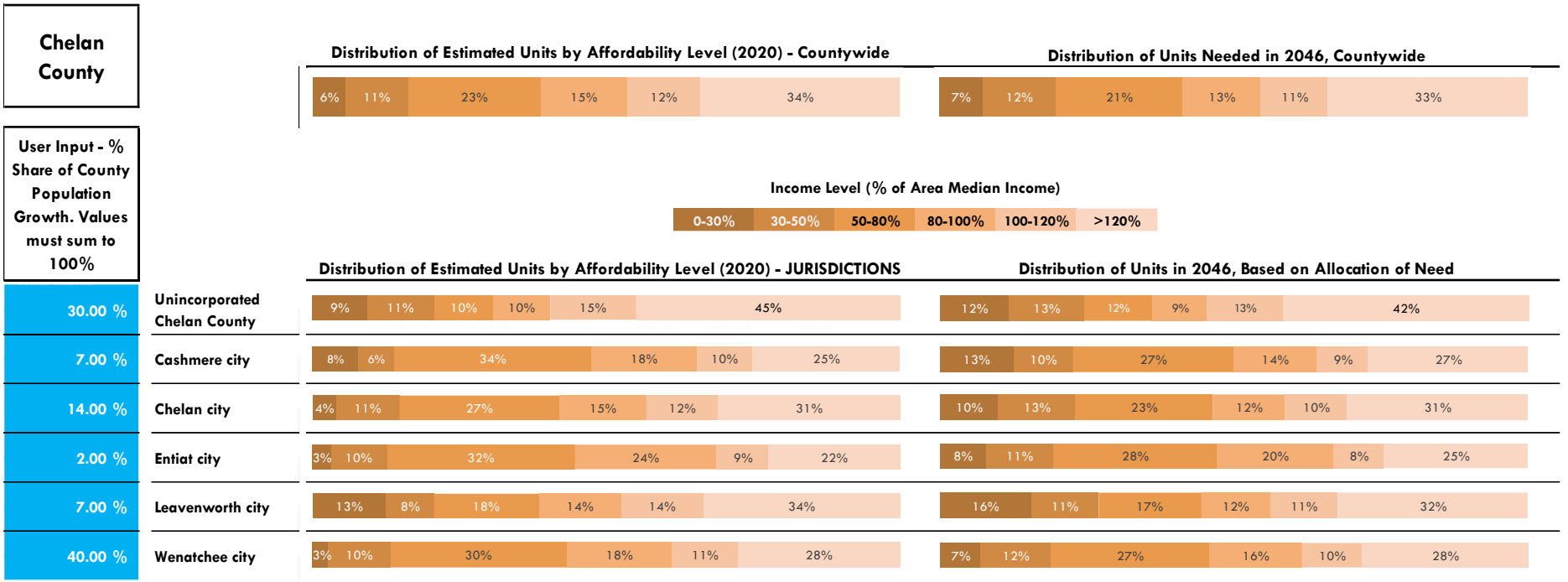
| | |
|---|---|
| 100.00% | <-- Sum of user inputs for jurisdiction shares of county future net housing need. If below 100%, increase shares. If above 100%, decrease shares. |
| Met Target | |

** The location of 7 existing permanent supportive housing units within Chelan County is unknown. Therefore, they are not included in the jurisdiction table below.*

| | | | Permanent Housing Needs by Income Level (% of Area Median Income) | | | | | | | | Emergency Housing Needs (Temporary) |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | 0-30% | | | | | | | |
| | | | Total | Non-PSH | PSH * | >30-50% | >50-80% | >80-100% | >100-120% | >120% | |
| 30.00 % | **Unincorporated Chelan County** | Estimated Housing Supply (2020) | 10,745 | 992 | 0 | 1,233 | 1,087 | 1,029 | 1,571 | 4,833 | 0 |
| | | Allocation Method A (2020-2046) | 3,227 | 383 | 277 | 539 | 538 | 263 | 242 | 984 | 92 |
| 7.00 % | **Cashmere city** | Estimated Housing Supply (2020) | 1,227 | 94 | 0 | 76 | 413 | 218 | 118 | 308 | 0 |
| | | Allocation Method A (2020-2046) | 753 | 89 | 65 | 126 | 126 | 61 | 56 | 230 | 21 |
| 14.00 % | **Chelan city** | Estimated Housing Supply (2020) | 2,570 | 101 | 0 | 280 | 699 | 381 | 312 | 797 | 5 |
| | | Allocation Method A (2020-2046) | 1,506 | 179 | 129 | 252 | 251 | 123 | 113 | 459 | 43 |
| 2.00 % | **Entiat city** | Estimated Housing Supply (2020) | 576 | 18 | 0 | 55 | 184 | 139 | 51 | 129 | 0 |
| | | Allocation Method A (2020-2046) | 215 | 26 | 18 | 36 | 36 | 18 | 16 | 66 | 6 |
| 7.00 % | **Leavenworth city** | Estimated Housing Supply (2020) | 1,210 | 152 | 0 | 97 | 217 | 170 | 168 | 406 | 4 |
| | | Allocation Method A (2020-2046) | 753 | 89 | 65 | 126 | 126 | 61 | 56 | 230 | 21 |
| 40.00 % | **Wenatchee city** | Estimated Housing Supply (2020) | 14,595 | 389 | 47 | 1,531 | 4,370 | 2,617 | 1,617 | 4,024 | 375 |
| | | Allocation Method A (2020-2046) | 4,303 | 511 | 370 | 719 | 718 | 351 | 322 | 1,312 | 122 |

Note: Example population target and population growth shares are selected for illustration purposes only.

## Exhibit 35. Screenshot of the HAPT Method A summary charts




Note: Example population target and population growth shares are selected for illustration purposes only.

## Exhibit 36. Screenshot of the HAPT Method B summary page

**Chelan County**

**Projection Year: 2046**
**Population Target = 95,670**

| | Permanent Housing Needs by Income Level (% of Area Median Income) | | | | | | | | Emergency Housing Needs (Temporary) |
|---|---|---|---|---|---|---|---|---|---|
| | | 0-30% | | | | | | | |
| | Total | Non-PSH | PSH | >30-50% | >50-80% | >80-100% | >100-120% | >120% | |
| **Countywide Estimated Housing Supply (2020)** | 30,930 | 1,746 | 54 | 3,272 | 6,970 | 4,554 | 3,837 | 10,497 | 384 |
| **Countywide Total Housing Needs(2046)** | 41,687 | 3,024 | 978 | 5,069 | 8,764 | 5,432 | 4,643 | 13,777 | 690 |
| **Countywide Additional Units Needed (2020-2046)** | 10,757 | 1,278 | 924 | 1,797 | 1,794 | 878 | 806 | 3,280 | 306 |
| **Sum of Allocation to Jurisdictions (from User Inputs)** | 10,765 | 1,278 | 931 | 1,797 | 1,794 | 878 | 806 | 3,280 | 306 |

| 100.00% | <-- Sum of user inputs for jurisdiction shares of county future net housing need. If below 100%, increase shares. If above 100%, decrease shares. |
|---|---|
| Met Target | |

| User Input - % Share of County Population Growth | <-- Note: these shares are tied to user inputs from Allocation Method A sheet | ** The location of 7 existing permanent supportive housing units within Chelan County is unknown. Therefore, they are not included in the jurisdiction table below.* | Income Level (% of Area Median Income) | | | | | | | | Emergency Housing Needs (Temporary) |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | 0-30% | | | | | | | |
| | | | Total | Non-PSH | PSH * | >30-50% | >50-80% | >80-100% | >100-120% | >120% | |
| 30.00 % | **Unincorporated Chelan County** | Estimated Housing Supply (2020) | 10,748 | 991 | 0 | 1,234 | 1,088 | 1,030 | 1,572 | 4,833 | 0 |
| | | Allocation Method B (2020-2046) | 3,235 | 23 | 328 | 466 | 1,852 | 792 | -15 | -212 | 231 |
| 7.00 % | **Cashmere city** | Estimated Housing Supply (2020) | 1,226 | 94 | 0 | 76 | 413 | 218 | 118 | 308 | 0 |
| | | Allocation Method B (2020-2046) | 753 | 49 | 46 | 165 | 3 | 40 | 103 | 346 | 33 |
| 14.00 % | **Chelan city** | Estimated Housing Supply (2020) | 2,570 | 101 | 0 | 280 | 699 | 381 | 312 | 797 | 5 |
| | | Allocation Method B (2020-2046) | 1,506 | 195 | 96 | 216 | 158 | 150 | 142 | 550 | 62 |
| 2.00 % | **Entiat city** | Estimated Housing Supply (2020) | 575 | 18 | 0 | 55 | 184 | 139 | 51 | 129 | 0 |
| | | Allocation Method B (2020-2046) | 215 | 39 | 19 | 41 | -17 | -36 | 37 | 132 | 13 |
| 7.00 % | **Leavenworth city** | Estimated Housing Supply (2020) | 1,210 | 152 | 0 | 97 | 217 | 170 | 168 | 406 | 4 |
| | | Allocation Method B (2020-2046) | 753 | -10 | 46 | 142 | 195 | 86 | 51 | 242 | 28 |
| 40.00 % | **Wenatchee city** | Estimated Housing Supply (2020) | 14,594 | 389 | 47 | 1,531 | 4,370 | 2,617 | 1,617 | 4,024 | 375 |
| | | Allocation Method B (2020-2046) | 4,303 | 982 | 396 | 767 | -397 | -155 | 488 | 2,221 | -62 |

Note: Example population target and population growth shares are selected for illustration purposes only.

**Part 3: Copy allocations for further refinement (optional)**
If the user wishes to make additional refinements to the allocations provided by Method A or Method B, they can copy the allocations in this tool and paste them into a new spreadsheet as values. Then they can make manual adjustments as needed. Please note that if you do not paste as values, some errors may appear since many cells are calculated fields. Pasting as values will also remove the functions that automatically allocate and summarize. It is the responsibility of counties working in collaboration with cities to ensure the final allocations sum to countywide housing need and are consistent with the Minimum Standards for Allocation.

## Limitations of the HAPT

As with any approach to allocation, the HAPT has limitations that should be considered before using. For example, it does not provide a way to adjust the share of each jurisdiction's growth allocation devoted to each income level. If counties and their jurisdictions have different criteria for allocating housing needs by income level, then they will need to develop a different allocation methodology or manually adjust the outputs from the HAPT in a way that still meets the minimum standards for allocation.[76] An alternative approach for allocating housing needs by income level is discussed in the following section. This alternative allows for more customization but requires considerably more data analysis to produce results.

The allocation methods available in the HAPT do not consider a jurisdiction's proximity to services such as health providers and social service agencies that may be important supports for people who are experiencing homelessness or are exiting homelessness. Transit network limitations and lack of services may make it difficult for people to access needed services in some jurisdictions.[77] Alternative methods for allocating PSH and emergency housing needs are also provided below.[78]

## Alternative approaches to allocating housing needs by income level

Depending upon local and regional policy objectives, there are various criteria that a county and its local jurisdictions may wish to use for allocating housing needs by income level. While it is possible to make manual adjustments to the HAPT output, it does not provide the ability to incorporate entirely new quantitative criteria. See Exhibit 37 for some examples of criteria a county and its jurisdictions may choose to consider. Many of these criteria are incorporated into a tool developed by Association of Bay Area Governments in California for exploring different allocation scenarios.[79] See "Issues to Consider" below for a discussion of these kinds of criteria.

---

[76] Note: manual adjustment of HAPT outputs would need to be done in a separate spreadsheet. The HAPT only allows the user to adjust the percentage shares of total housing growth to each jurisdiction.
[77] Vouchers for taxi or app-enabled ride sharing services for first/last mile to stations or employment centers are effective tools for helping people access services. Solutions like these can create housing options that allow persons and households who are experiencing hardship the ability to stay in their communities with existing support networks while accessing services available in other areas.
[78] If a county wishes to use an alternative allocation method for PSH or emergency housing, they can save the HAPT outputs as values in a new spreadsheet and then manually replace those numbers with the alternative allocations. If they do this, it will be their responsibility to ensure the sum of jurisdiction allocations is equal to countywide needs, in accordance with the Minimum Standards for Allocation outlined above.
[79] ABAG provides a Regional Housing Needs Allocation (RHNA) Tool Factor Overview with description of each criterion including data sources. See https://rhna-factors.mtcanalytics.org/ and https://rhna-factors.mtcanalytics.org/data/RHNA_tool_factors_overview.pdf

## Exhibit 37. Potential criteria for weighting housing need allocations

| Criteria | Suggested data sources |
|---|---|
| **Buildable land capacity** | ○ County buildable lands report |
| **Current distribution of income-restricted housing** | ○ County or regional income-restricted housing inventory<br>○ Washington Center for Real Estate Research Subsidized Rental Housing Profile[80] |
| **Access to opportunity index** | ○ PSRC Opportunity Mapping[81] |
| **Displacement risk index** | ○ PSRC Displacement Risk Mapping[82]<br>○ Guidance on evaluating displacement risk from Commerce's Guidance to Address Racially Disparate Impacts |
| **Proximity to jobs** | ○ Census OntheMap[83] Longitudinal Employer-Household Dynamics |
| **Proximity to jobs via transit** | ○ EPA Smart Location Mapping[84] Access to Jobs and Workers Via Transit Tool |
| **Proximity to projected future jobs** | ○ PSRC Land Use Vision[85] growth projections<br>○ Local adopted employment growth targets |
| **Jobs-housing balance** | ○ Jobs: Census OntheMap Longitudinal Employer-Household Dynamics<br>○ Jobs: PSRC covered employment[86] estimates by city<br>○ Housing: Commerce HAPT includes 2020 housing unit counts |
| **Jobs-housing fit** | ○ Jobs by wage level: Census OntheMap Longitudinal Employer-Household Dynamics<br>○ Supply of housing by affordability level: Commerce HAPT includes 2020 housing unit counts by affordability level |
| **Density/quality of transit service** | ○ Transit agency route maps |
| **Current high-capacity transit** | ○ Transit agency route maps |
| **Planned high-capacity transit** | ○ Transit agency service expansion plans |

Below we share a methodology used in the Minneapolis-St. Paul region that can be adapted to use any quantitative criteria for weighting the amount of housing need allocated to each jurisdiction. As with methodology used in the HAPT, this approach is designed to ensure that all countywide projected housing needs are allocated to jurisdictions. While this methodology is more complicated to implement than using output from the HAPT, it provides for more flexibility to address local policy objectives.

---

[80] https://wcrer.be.uw.edu/housing-market-data-toolkit/subsidized-rental-housing-profile/
[81] https://www.psrc.org/opportunity-mapping
[82] https://www.psrc.org/our-work/displacement-risk-mapping
[83] https://onthemap.ces.census.gov/
[84] https://www.epa.gov/smartgrowth/smart-location-mapping
[85] https://www.psrc.org/projections-cities-and-other-places
[86] https://www.psrc.org/covered-employment-estimates

**Example: Metropolitan Council allocation of affordable housing need**

The Metropolitan Council is the regional planning agency for the Minneapolis / St. Paul area. In 2006 they developed a methodology for allocating projected region-wide low-income housing needs (0-80% of AMI, with breakdowns) to local jurisdictions. A detailed step-by-step description[87] of how they carried out these calculations is provided in a technical appendix to the Thrive MSP 2040 Housing Policy Plan. A high-level description of the process is provided below.

1. **Apportion new low-income housing need in each community according to its projected household growth**. In other words, the first default assumption is that the total region-wide need for additional low-income housing units is allocated to jurisdictions based on their own percentage share of total projected housing growth. For example, if the total region-wide need for low-income housing units is 1,000 and a jurisdiction will get 20% of the projected growth within the county, they would be assigned 200 low-income housing units. Note that this allocation includes all affordable housing needed for 80% of AMI or less. In a later step, the allocation is broken down by income level band.

2. **Adjust the allocation upwards or downwards according to two selected criteria.** In this step, the Council considered two criteria that were measured for each jurisdiction:

   - The jurisdiction's percentage share of current affordable housing stock region wide.
   - The jurisdiction's ratio of low wage jobs to residents working in low wage jobs.

   First, the Council used a statistical technique called Z-score[88] to standardize each criterion on the same scale. Z-scores measure how far a jurisdiction's own value for a criterion is from the average. A positive Z-score means the jurisdiction is higher than average, while a negative score indicates it is lower than average. Next, the Council rescaled the Z-score downward to ensure that the adjustments in this step do not result in any negative allocations. Then the Council weighted each criterion relative to its importance for allocation (67% weight for Job/Worker ratio and 33% for current share of affordable housing). Finally, it multiplied the scaled Z-score by the weight to calculate an adjustment factor. This is simply a percentage for calculating how much to adjust the default allocation from step 1 upward or downward for each criterion. To complete step 2, multiply the adjustment factor by the default allocation.

3. **Break down communities' total allocations into "bands of affordability."** Step 2 provides an allocation of total additional housing needs for serving residents with incomes at 80% of AMI or below at the jurisdiction level. In step 3, these total needs are broken down into three income bands: 0-30%; >30-50%; and >50-80% of AMI. This step begins with the default breakdown of the jurisdictions need defined in Step 2. This default breakdown matches the percentage shares for each band found in countywide housing need. Next, for each income band, they subtract the jurisdiction's baseline percentage share of countywide housing affordable at that income level from the average jurisdiction's percentage share to calculate the difference, a percentage that could be positive or negative. This difference is added to the default region-wide percentage share of need in that income band. Finally, the calculated percentages for each band are adjusted to ensure they sum to 100%. These percentage shares are used to breakdown the Step 2 allocation into the three separate income bands.

---

[87] This description is in Appendix B: Methodology of the Allocation of Affordable Housing Need. It includes example calculations and charts to visualize the process. See https://metrocouncil.org/Housing/Planning/HOUSING-POLICY-PLAN-2040/2040-Housing-Policy-Plan.aspx

[88] A Z-score is calculated with the formula: = (X - Average) ÷ Standard Deviation. In other words, subtract the average for all jurisdictions from the jurisdiction's own measure and divide by the standard deviation of all jurisdiction's measures.

# Alternative methods for allocating permanent supportive and emergency housing needs

The methods below provide alternative frameworks for allocating permanent supportive and emergency housing needs. These methods are not exhaustive of all possible options. Counties and cities should collaborate to determine the allocation method that will best suit local needs. Further, the methods presented below do not consider buildable land or infrastructure capacity should new facilities need to be developed in order to meet the allocation goals. In these cases, counties and jurisdictions should collaborate on methods of allocation that encourage consistency and equity throughout the county, address housing choice and expand access to amenity-rich neighborhoods.

In each of these models, there is a single allocation for all emergency housing needs. In many communities, shelters and service providers focus on specific populations (e.g., families, survivors of domestic violence, youth) and many shelters are divided by gender identity. These allocations do not specify which populations should or could be served in the allocated units. Communities should draw on local knowledge of need, Homeless Management Information Services (HMIS) data, Point in Time (PIT) count data and other data sources to determine the mix of populations to be served in these units. Every effort should be made to create low-barrier emergency shelter and housing options that can serve diverse populations and household types.

Unlike emergency housing, PSH is a permanent housing option. In the projections, PSH is considered a subset of 0-30% AMI housing, but is categorized separately. This enables counties and localities to differentiate the allocation of PSH and non-PSH 0-30% AMI needs if they choose to do so.

## Allocation based on jurisdiction of origin

Some counties have access to the last address or neighborhood of clients being served in the homeless service system. This information may be collected through the local HMIS data or through the PIT Count survey. This method of allocation leverages this information to target the allocation of permanent supportive and emergency housing needs to jurisdictions based on the flow of entry to the homeless service system. In this method, the allocation would be proportional to the number of clients entering the system from specific jurisdictions.

Exhibit 38 provides an example allocation, where a county is projected to need 500 emergency housing beds and 1,000 permanent supportive housing units. Allocations would be distributed using the proportion of entries into the homeless service system.

### Exhibit 38. Example allocation of permanent supportive and emergency housing needs by jurisdiction of origin

| Jurisdiction | Percentage of last known address in HMIS/PIT | Allocated portion of total emergency housing beds needed in 2045 (500) | Allocated portion of PSH units needed in 2045 (1,000) |
|---|---|---|---|
| Central City | 45% | 225 | 450 |
| Eastern Suburb | 20% | 100 | 200 |
| South City | 35% | 175 | 350 |

| Jurisdiction | Allocated portion of total emergency housing beds needed in 2045 | Emergency housing beds, 2020 | Additional emergency housing beds needed by 2045 |
|---|---|---|---|
| Central City | 225 | 200 | 25 |
| Eastern Suburb | 100 | 25 | 75 |
| South City | 175 | 0 | 175 |

| Jurisdiction | Allocated portion of total PSH units needed in 2045 | PSH units, 2020 | Additional PSH units needed by 2045 |
|---|---|---|---|
| Central City | 450 | 100 | 350 |
| Eastern Suburb | 200 | 50 | 150 |
| South City | 350 | 20 | 330 |

This method can be replicated using Commerce's projected countywide PSH and emergency housing need, using the following steps:

- Determine each jurisdiction that should be included in the allocation. This would include cities, towns and other unincorporated areas.
- Start with the total number of entries into the homeless service system, using HMIS, PIT or similar local data. Remove any missing entries or addresses outside of the county. Sum the total number of entries for each jurisdiction and divide each jurisdiction's entries total by the county total to determine the proportion of units in each jurisdiction.
- Multiply the total number of emergency housing units and emergency shelter beds for the county by the proportion for each jurisdiction to determine the allocation. Repeat this process for permanent supportive housing.
- Subtract the number of existing emergency housing units and emergency shelter beds in each jurisdiction from the total allocation to determine the number of emergency housing units and emergency shelter beds needed. Repeat this process for permanent supportive housing.

**Benefits of method**

This method allocates resources in areas where clients in need of supportive or emergency housing are entering the system within each county. This may help stabilize connections to work, family and schools, thereby limiting the disruption of housing instability. It also encourages jurisdictions with higher levels of entrance into the homeless service system to plan for housing proportionally.

**Limitations of method**

Clients in need of supportive or emergency housing may have experienced displacement multiple times. In those circumstances, this method would not capture the client's original home jurisdiction, but rather the most recent. This limitation is particularly applicable to people displaced due to gentrification, which can take place over a number of years. Clients' last address before entering the homeless service system are often from poorly resourced neighborhoods that are impacted by multiple forms of inequality. Therefore, this method may limit options for shelter and PSH to less resourced areas and not create meaningful opportunities for housing choice. Additionally, this method may be less useful following a mass displacement event, such as a fire or flood.

Counties also may have high rates of missing data for last known address. If used, this allocation method will reflect the total number of clients for whom last address is known and may skew the overall allocation. If there is low data quality or high rates of missing data, communities should not use this method. Counties and jurisdictions may collaborate with homeless service staff to provide best estimates of jurisdictions with higher levels of displacement into homelessness and housing instability and adjust numbers accordingly. Additionally, some counties may experience higher levels of inflow to the homeless service system from individuals who have moved from outside of the county. This method cannot account for this type of displacement.

## Use weighted formula based on services, amenities and jobs

Many of those in need of emergency housing, emergency shelter or permanent supportive housing have other service needs. This may include mental and behavioral health services, other healthcare needs and social service case management. Especially when clients have limited mobility options, including lack of access to a vehicle or other reliable transit, jurisdictions close to these services may be more appropriate for supportive and emergency housing. Additionally, some clients may benefit from ready access to medical services provided on an outpatient basis and emergency health services.

In some counties, historical exclusion and neighborhood segregation has led to the clustering of supportive and emergency housing needs. This may reduce housing choice for low-income households and reduce access to basic or desirable amenities, limiting the ability to live near areas of connection, quality schools and other amenities such as parks or basic services. Moreover, many people who are in need of the homeless service system can and do work. So supportive and emergency housing opportunities should be located in areas with job opportunities, allowing households to choose homes close to their place of employment.

Jurisdictions may implement weighted models that consider these and other factors to allocate housing. Local advisory teams should determine the factors to consider and their relative weights. Stakeholders within each county will need to collaborate to determine the factors present in this model and their relative weights. In one example of a similar methodology from the Association of Bay Area Governments, factors were determined through a review of guidance from their region and state on housing plans as well as a member survey that solicited feedback about housing issues.[89] The relative weights were determined through both survey responses on the factors' relative importance to housing issues and statutory requirements, such as affirmatively furthering fair housing.

Exhibit 39 shows an example allocation using this method, where a county is projected to need 500 emergency housing beds and 1,000 permanent supportive housing units.

### Exhibit 39. Example allocation of permanent supportive and emergency housing needs using weighted formula

| Jurisdiction | Raw factor score | Rescaled factor score | Factor distribution |
|---|---|---|---|
| Central City | 92% | 1.5 | 47% |
| Eastern Suburb | 30% | 1.0 | 31% |
| South City | 42% | 0.7 | 22% |

[89] https://abag.ca.gov/sites/default/files/documents/2021-02/ABAG_Draft_RHNA_Methodology_Report_2023-2031.pdf

| Jurisdiction | Factor distribution | Allocated portion of total emergency housing beds needed in 2045 (500) | Allocated portion of total PSH units needed in 2045 (1,000) |
|---|---|---|---|
| Central City | 47% | 235 | 470 |
| Eastern Suburb | 31% | 155 | 310 |
| South City | 22% | 110 | 220 |

| Jurisdiction | Allocated portion of total emergency housing beds needed in 2045 | Emergency housing beds, 2020 | Additional emergency housing beds needed by 2045 |
|---|---|---|---|
| Central City | 235 | 200 | 35 |
| Eastern Suburb | 155 | 25 | 130 |
| South City | 110 | 0 | 110 |

| Jurisdiction | Allocated portion of PSH units needed in 2045 | PSH units, 2020 | Additional PSH units needed by 2045 |
|---|---|---|---|
| Central City | 470 | 100 | 370 |
| Eastern Suburb | 310 | 50 | 260 |
| South City | 220 | 20 | 200 |

This method can be replicated using Commerce's projected countywide PSH and emergency housing need, using the following steps:

- Determine each jurisdiction that should be included in the allocation. This would include cities, towns and other unincorporated areas.
- Drawing on local stakeholders, current housing guidance and other statutory requirements, determine the factors that should be included in the allocation (e.g., access to behavioral health services) and the relative weight of each factor.
- Score each jurisdiction based on the factors. This may require rescaling scores to equal 100%. See the example for Metropolitan Council Allocation of Affordable Housing Needs on page 77 above for more information on how to calculate and rescale scores using Z-scores.
- Add all rescaled scores, then divide each jurisdiction's score by the total. This is the factor distribution score.
- Multiply the total need by the jurisdiction's factor distribution score.
- Subtract the number of existing emergency housing beds in each jurisdiction from the total allocation to determine the number of emergency housing beds needed. Repeat this process for permanent supportive housing.

**Benefits of method**

This method aims to provide equitable access to needed services and higher-opportunity areas, or weight decisions of location based on unique local factors. It recognizes that some jurisdictions may provide greater

service access or capacity, amenities or other factors to clients in need of permanent supportive or emergency housing.

**Limitations of method**

The factors that form the basis of the allocation will need to be scored locally. This could require substantial background research to locate service providers, service capacity and other amenities. Further, counties should aim for consensus on weighting factors, which may take time. This method would require normalizing scoring criteria (e.g., calculating Z-scores) and re-scaling allocation weights, which can be complex mathematically. Counties undertaking this method should draw on local planners with statistical skills or outside consultants. This method could also concentrate allocations in places where services and other amenities are currently located, without consideration of areas that could or should develop these amenities in the future. This could further limit housing choice and access to opportunity by concentrating supportive and/or emergency housing services in jurisdictions where they are currently located.

## Issues to consider with allocations

There are a variety of issues that counties and cities may wish to consider when determining each jurisdiction's share of housing needs for lower-income households. These issues may be considered when selecting an allocation method or refining one of the methods described above, or even designing a new method to better align the resulting allocation with local and countywide planning goals and policies. This list is not exhaustive; counties and cities may consider other issues as well.

- Capacity and infrastructure for new housing development
- Access to transit, amenities, jobs or high opportunity areas
- Equity and access to opportunity
- Access to services
- Addressing displacement risk
- Current disparities in the provision of affordable housing options and services
- Dealing with small allocations
- Using existing housing stock to meet affordability goals
- Vacation homes
- Inter-jurisdictional partnerships
- Combined allocations to cities and associated UGAs, including consideration of annexations
- Allocating needs outside of incorporated and unincorporated areas

QUESTIONS TO CONSIDER DURING ALLOCATION

- Which jurisdictions are currently affordable, and which are not?
  - 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?

*Questions curtesy of King County*

## Capacity and infrastructure for new housing development

The vast majority of projected unmet housing needs will be addressed through new residential and mixed-use development. Counties and cities with current data about expected development and/or zoned land capacity for new housing development can use this information to help refine allocations.

However, before a jurisdiction limits allocation of housing need to existing zoned capacity, its growth allocation should be considered in conjunction with the updated housing requirements under RCW 36.70A.070(2). Housing element updates require jurisdictions to have sufficient capacity of land to accommodate new housing production needs at each income level.

In many cases, cities and counties will be considering zoning changes in their comprehensive plan updates to provide land capacity to accommodate projected housing needs at all income levels. This may mean increasing densities to accommodate lower-income housing needs. Therefore, it may be appropriate for total housing growth allocations to exceed existing housing capacity as measured in a recent buildable lands analysis or other studies. In the case a jurisdiction would need to increase densities to accommodate lower-income housing needs, a jurisdiction would need to show capacity for the allocated housing need in the land capacity analysis.[90]

Commerce's Land Capacity Guidance in the Guidance for Updating Your Housing Element document addresses how jurisdictions can analyze their land capacity and its alignment with allocated housing needs. This analysis includes determining what kind of zoning is necessary to accommodate new housing production at each income level as well as PSH and emergency housing.

Areas with planned infrastructure investments that align well with housing should be considered for zoning changes to enable more capacity and a greater allocation of housing needs. If an area's ability to accommodate new housing development is constrained by limits on sewer and water capacity, then those limits should be addressed in the capital facilities plan.

## Access to transit, amenities, jobs or high opportunity areas

Counties and cities may have local policy objectives to focus new housing development in areas that are well served by transit, close to jobs or amenities, or in high opportunity areas that may have excluded low-income residents in years past. Building new affordable housing, shelter and supportive housing is often met with considerable local pushback, despite little evidence that there is an impact on property values or crime rates.[91] This further impedes access to amenities and other opportunities that are important to lower-income populations.[92] Housing allocations can help implement local policy objectives in the way targets are set for housing need by affordability level and for PSH and emergency housing. Since transit, services, amenities and jobs are all concentrated in UGAs, all urban growth areas of the county should be accessible for lower-income households.

---

[90] Sufficient capacity for all allocated housing needs must be documented by the end of the periodic update cycle, as noted in the Land Capacity Guidance section of the *Guidance for Updating Your Housing Element (2023)* document.

[91] https://citylimits.org/2015/02/25/after-the-shouting-do-shelters-and-supportive-housing-harm-neighborhoods/

[92] For example, approximately 40% of people experiencing unsheltered homelessness are employed and may benefit from housing options closer to employment opportunities. See https://news.uchicago.edu/story/employment-alone-isnt-enough-solve-homelessness-study-suggests and https://bfi.uchicago.edu/working-paper/learning-about-homelessness-using-linked-survey-and-administrative-data/ (Meyer, Bruce D. et al (2021). Learning About Homelessness Using Linked Survey and Administrative Data. University of Chicago Working Paper 2021-65.)

## Equity and access to opportunity

There are significant and persistent disparities with regards to household income and homelessness. Due to current and historic systems of racial and ethnic discrimination, Black, Indigenous and people of color are more likely to be low-income and are vastly overrepresented in the homeless service system.[93] Racially discriminatory practices such as 'redlining' and restrictive covenants on property have had long-lasting impacts resulting in multi-generational wealth inequality due to barriers to homeownership experienced by marginalized populations.

Allocation of housing needs can support local equity initiatives in giving fair access to high opportunity areas for impacted populations and be the basis for planning to address structural barriers to housing opportunities. HB 1220 requires that jurisdictions planning under GMA examine racially disparate impacts, displacement and exclusion resulting from current housing policies and regulations and begin to undo them with policies and regulations. The findings from this analysis can inform allocations, such as allocation of lower income housing needs to areas of opportunity or areas where housing types serving lower-income households have not traditionally been allowed. Commerce has published guidance on how communities can begin to address and undo past racially disparate impacts, exclusion and displacement in housing policies and regulations.[94]

## Access to services

People who have experienced or are at risk of homelessness and require access to PSH and emergency housing may also have service needs. The experience of homelessness, particularly unsheltered homelessness, leads to increased risk of certain health conditions.[95] These individuals may require access to services, whether coordinated by case managers or through self-referral. Counties and jurisdictions may consider distance to service options in their allocation plans, developing housing near existing service locations. Conversely, other areas may have other amenities that make it an ideal location for shelter or PSH, such as transit, but not any social service infrastructure. Communities should consider ways to expand social service offerings, whether through additional physical locations or telehealth, to maximize areas suitable for these housing types.

## Addressing displacement risk

In some communities, residents may be at heightened risk of displacement due to rising housing costs or redevelopment activity. As noted above, RCW 36.70A.070(2) requires that jurisdictions planning under GMA examine racially disparate impacts, displacement and exclusion resulting from current housing policies and regulations. The findings of this analysis and other work by regional planning agencies, such as the Puget Sound Regional Council (PSRC), may be helpful in identifying areas with the most acute displacement pressures or which kinds of households are most at risk of displacement. This information can be used to inform an allocation of housing needs that may counteract displacement pressures with additional supply of units at income levels in greatest need. Jurisdictions with displacement pressure should also consider policies to minimize or mitigate any additional displacement pressure resulting from new housing development.

Commerce has released Guidance to Address Racially Disparate Impacts that addresses how to identify areas at risk of displacement and recommendations on how to begin to undo displacement and prevent future displacement.[96] Commerce is also developing a statewide map of displacement risk at the census tract level

---

[93] https://endhomelessness.org/homelessness-in-america/what-causes-homelessness/inequality/
[94] See "Guidance for Addressing Racially Disparate Impacts" on Commerce's website here: https://www.commerce.wa.gov/serving-communities/growth-management/growth-management-topics/planning-for-housing/updating-gma-housing-elements/
[95] https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6846801/
[96] https://deptofcommerce.app.box.com/s/1l217l98jattb87qobtw63pkplzhxege

to support jurisdictions in meeting the new requirements of the housing element.[97] These resources may be helpful for evaluating how displacement risk could be factored into allocation decisions.

## Current disparities in the provision of affordable housing options and services

In many counties, the current distribution of affordable or supportive housing options is not evenly spread among different jurisdictions. The same can be said for emergency housing and services. There are several (often interrelated) causes that can give rise to these outcomes, including:

- Exclusionary zoning practices that disallow housing diversity within communities
- Displacement of households from jurisdictions with rising housing costs to other jurisdictions with relatively lower costs
- Community resistance to siting new affordable housing, shelters or services
- Differences in levels of public investment in support services and affordable housing
- Differences in housing market conditions that result in variation in housing costs

Whatever the causes, allocations of housing need should consider these differences. For example, an allocation may assign more affordable housing need to jurisdictions where there is a current lack of affordable housing options and less need to jurisdictions that already have a greater share of the county's affordable housing stock.

Commerce is providing data about baseline (2020) housing stock for all jurisdictions, including estimates of units by affordability level. This data is used in the HAPT to develop allocations that account for current disparities (Method B). Counties and cities can use this data to inform discussions about how to equitably allocate projected housing need by jurisdiction. They may also wish to supplement or replace this data with more reliable local information about income-restricted housing unit counts, permanent supportive housing or emergency housing/emergency shelters by jurisdiction.

## Dealing with small allocations

In using any of the housing allocation methods, it is possible that some smaller populated jurisdictions will be allocated a small number of units that may not be feasible for a separate new development (e.g., one unit of emergency housing or three units for extremely low-income households). In these cases, counties and cities may consider a variety of options to make the allocation more viable for implementation.

- Since the focus of the allocation methods is to distribute PSH and emergency housing needs based on population, existing need or neighborhood amenities, jurisdictions assigned very small allocations can cooperate with neighboring or nearby jurisdictions to consolidate resources or facilities. This will keep resources in the areas most closely aligned with the original intent of the allocation methodology and may be beneficial in small towns or cities. Other areas, such as Metro Atlanta, have successfully implemented shared facilities with counties proportionally sharing costs. The King County Regional Homelessness Authority brings together county and City of Seattle resources to better coordinate services within King County.
- Alternatively, jurisdictions with small allocations for emergency housing needs may choose to use voucher systems through hotels or temporary housing to accommodate their allocation allotment without the need for the construction of a new facility. If this approach is implemented, jurisdictions will need to work with service partners to ensure that households using a voucher have access to case management and other needed services.

[97] A draft version of this statewide displacement risk map should be available by the summer of 2023.

- In many jurisdictions, smaller non-profits or faith-based programs may have capacity to provide shelter. In many cases, the shelters offered through these types of organizations may be seasonal or temporary, but may have the ability to convert to year-round shelter with additional funding or service supports.
- Small cities or towns in sparsely populated counties may receive small allocations and contend with the compounding challenge of having long routes between services or few or no service options. These communities should consider partnerships with mainstream service providers, such as health clinics, county social services, school support offices and community action partnerships, to fund and staff emergency housing and PSH. Jurisdictions in close proximity to one another may also consider pooling resources and sharing allocations, or sharing allocations with nearby population centers.

It is recommended that jurisdictions who plan to coordinate on small allocations of housing needs with other jurisdictions document such plans to implement their housing needs in their comprehensive plan.

## Using existing housing stock to meet affordability goals

Some communities may have limited capacity for new housing development, but nonetheless have housing needs to address. In addition to options for increasing capacity, these cities and jurisdictions also have options to make their existing housing stock more affordable. Examples include:

- Developing or supporting a program or organization that purchases existing housing stock that is not rent-restricted or housing stock with affordability covenants that are expiring. This kind of housing preservation is possible in partnership with an affordable housing provider. Depending on the level of public subsidy, the units can be made available at lower affordability levels or rents can be held steady until they become affordable in the future.
- Developing or supporting a program or organization that purchases and converts existing buildings, such as motels or homes with several bedrooms, to serve as emergency or supportive housing.
- Developing or supporting a program or organization that provides vouchers that can be used in the private housing market to effectively change the affordability level of current units.
- Removing occupancy requirements to allow unrelated persons to live together in larger homes.[98]
- Adjusting development regulations and/or ADU standards to make it easier to convert larger homes into multiple smaller units.[99]

These options can be considered when determining jurisdictional allocations, particularly in cases when allocated housing needs exceed adopted growth targets such as may happen if a county chooses an allocation method like Method B.

## Vacation homes

In some communities, a significant proportion of the housing stock is not used as full-time residences. Instead, they are used as vacation homes and/or rented as short-term rentals using services such as Airbnb or VRBO. In these locations, much of the new housing development may be devoted to serving the demand for vacation homes rather than demand for full-time residences.

Commerce's housing needs projections account for the proportion of the current housing stock devoted to recreational use rather than as a full-time residence. However, the projection of additional future units needed

---

[98] While this may be an appropriate housing policy for addressing some housing needs in your jurisdiction, it does not affect the requirement to show capacity for meeting housing needs through net new housing growth. See Commerce's Land Capacity Guidance in the "Guidance for Updating your Housing Element" (2023).

[99] See Commerce's Land Capacity Guidance in the "Guidance for Updating your Housing Element" (2023) for guidance on estimating how much capacity can be reasonably added through adjustments to ADU policies and regulations.

will only account for the needs of the full-time population. Consequentially, the allocations in the HAPT will only address additional units needed to accommodate full-time population and not new housing units used as vacation homes or short-term rentals. Therefore, jurisdictions should identify policies to ensure that enough new housing development accommodates full-time residents. Income-restricted housing, for example, can require full-time residency. For market-rate housing, jurisdictions can explore policies such as short-term rental regulations, licensing or taxes. See Commerce's "Guidance for Developing a Housing Action Plan" for examples of policies to consider.[100]

## Inter-jurisdictional partnerships

There are several inter-jurisdictional partnerships in Washington formed to support collaboration in the development and implementation of strategies for meeting regional or sub-regional housing needs that exceed the boundaries of any single jurisdiction. Examples include A Regional Coalition for Housing (ARCH), South King Housing & Homeless Partners (SKHHP), Alliance for Housing Affordability (AHA) and South Sound Housing Affordability Partners (SSHAP). While individual jurisdictions are statutorily required to inventory and plan for their own shares of countywide housing needs, inter-jurisdictional partnerships may provide opportunities for collectively accommodating housing needs more effectively.

For example, a partnership could be created that allows for the pooling of resources to fund development of affordable housing, PSH or emergency housing that might not otherwise get built, or it could track progress towards meeting collective housing targets for low-income housing within a sub-region. Alternatively, such an organization may be able to facilitate and manage an inter-jurisdictional housing voucher system. Jurisdictions may reflect their desire to engage in such partnerships in countywide planning policies and comprehensive plans.

## Combined allocations to cities and associated UGAs, including consideration of annexations

Many counties allocate population not to individual cities alone, but instead to cities combined with their unincorporated UGAs. It is possible to allocate housing needs with the HAPT using this approach, but there are some considerations to keep in mind when doing so. Most importantly, due to the new requirements in the housing element and planning under GMA, it is important that housing need allocations distinguish between growth in cities (within their current boundaries) and growth in unincorporated areas outside of cities. This is because it is ultimately the county's responsibility to zone appropriately for accommodating housing needs in unincorporated areas, even when they are in UGAs associated with cities. See Commerce's Land Capacity Guidance in the "Guidance for Updating your Housing Element" (2023) for more details.

While the HAPT was designed with the assumption that the user will be entering growth shares for each city/town and a single growth share for all unincorporated areas combined, it can be used to support combined allocations to cities and their associated UGAs or consideration of future annexation areas. To do this, the user would simply enter the share of growth for the combined city/UGA area in the row for each city. Then the share for the unincorporated county would only be for areas outside of the cities with their associated UGAs. Counties and cities that choose to use the HAPT in this way to support allocation would then need to complete an additional step to sub-allocate the combined city/UGA allocation between the city and its associated unincorporated UGA. This is not a feature available in HAPT and would need to be done in a separate spreadsheet. The simplest approach would be to consider capacity by zoning category and how

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

those correspond to affordability levels. For example, if 80% of the combined capacity for multifamily development is located in the city, then the city should receive 80% of the housing needs at 50% AMI or below.

### Allocating needs outside of incorporated and urbanized areas

Consistent with the GMA, counties should prioritize allocating growth and accommodating housing needs in incorporated areas, unincorporated urban growth areas (UGAs) and Limited Areas of More Intense Rural Development (LAMIRDs)[101] that can accommodate moderate and high-density housing production and where infrastructure limitations such as sewer and water can be addressed.

Rural areas outside of UGAs and some LAMIRDs do not allow or support the level of density that is required to efficiently address new low-income and emergency housing needs. Before allocating low-income housing needs to rural areas outside of UGAs and some LAMIRDs, consider at what price points and affordability levels new housing can be built and what income housing needs this can meet. Additionally, most residents living in rural areas would also need to own a vehicle and drive longer distances to enable them to access services and employment. This adds significantly to household costs, making rural housing options less practical for low-income housing needs. Therefore, allocation of lower income housing needs in rural areas should be done with care, together with minimal growth allocated to rural areas.

The HAPT does not support sub-allocation of housing needs to different UGAs, LAMIRDs or rural areas within unincorporated counties. Counties that wish to sub-allocate needs in unincorporated areas may wish to consider capacity within each UGA or LAMIRD by zone category, as discussed above and in Commerce's Land Capacity Guidance.

In counties where sufficient capacity for low-income housing growth cannot be accommodated in UGAs or LAMIRDS after all other options have been thoroughly evaluated, it may be appropriate to consider the role of accessory dwelling units (ADUs), generally attached, in rural areas to accommodate a very small portion of the lower-income housing needs in the county. However, ADUs are typically built on privately owned parcels and require the landowner's voluntary participation and willingness to rent the units at prices affordable to low or even moderate-income households. Households must also have sufficient funding to build an ADU, limiting the amount of ADUs possible overall. Additionally, households living in these units would likely lack access to services, transit and other amenities characteristic of urbanized areas, thereby limiting important resources. See "Access to Services and Access to Transit, Amenities, Jobs or High Opportunity Areas" above for related considerations.

## Next steps

After developing countywide planning policies, determining future housing needs based on OFM population projections, and allocating countywide housing needs, local planners should use this information to develop city and county housing elements. Commerce's Guidance for Updating your Housing Element (Book 2) and Guidance to Address Racially Disparate Impacts (Book 3) walk through the material needed to guide this work.

[101] In 2021, the GMA was amended (SB 5275) to allow redevelopment and infill within LAMIRDs that have public facilities and services. Some counties may consider evaluating capacity and encouraging new housing development, including affordable housing, in LAMRIDs that can support new development. Availability of public water and sewer should be considered when determining which LAMIRDs can support new development.

# Appendix A: Countywide planning policies to support housing

The Growth Management Act (GMA) includes goals that should act as the basis of all comprehensive planning. The housing goal is to "Plan for and accommodate housing affordable to all economic segments of the population of this state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock."

Housing affordability is determined and affected by a complex combination of factors. No one action is capable of creating and generating housing affordable to all economic segments of the population. Nevertheless, counties and local jurisdictions are tasked with meeting this challenge. Fortunately, there are examples of policies and actions that have successfully contributed to housing affordability throughout Washington state and across the country.

This guide includes examples of countywide policies that directly address the need to plan and accommodate for housing affordability. It also includes examples that more holistically contribute to an economy and land-use framework where housing is available to all economic segments of the population. Where more diverse housing types are widely available, fewer people are at risk of experiencing homelessness. When individuals and families remain stably housed and are less burdened by housing costs, local economies thrive.

**Contents:**



## Plan for affordable housing

### Allocate countywide housing needs

In 2021, changes to the housing element dramatically changed the way communities are to plan for housing. Commerce is to project housing needs and has done so at the county level. Counties are to allocate or disaggregate the countywide housing needs to cities, towns and the unincorporated county. Countywide planning policies may be needed to detail this process. These policies can align with any policies for population allocation.

As countywide policies are developed to consider the new allocation considerations of allocating hosing needs of all income brackets, countywide allocation policies may consider:

- Capacity and infrastructure for new housing development
- Access to transit, amenities, jobs or high opportunity areas
- Equity and access to opportunity
- Access to services
- Addressing displacement risk
- Current disparities in the provision of affordable housing options and services
- Inter-jurisdictional partnerships
- Dealing with small allocations
- Using existing housing stock to meet affordability goals
- Allocating needs outside of incorporated and unincorporated areas
- Combined allocations to cities and associated UGAs
- Vacation homes

For examples of policies about allocating housing needs, see Exhibit 8.

## Diversify housing stock to address housing needs across income levels

These examples include countywide planning policies that address the need to have a variety of housing types so that households of all types and sizes can find a home they can afford.

***Puget Sound Regional Council Vision 2050 (October 2020) - Multi-County Planning Policy H-6***

Develop and provide a range of housing choices for workers at all income levels throughout the region that is accessible to job centers and attainable to workers at anticipated wages.

***King County Countywide Planning Policies (December 21, 2022) - Housing Policy H-18***

Adopt inclusive planning tools and policies whose purpose is to increase the ability of all residents in jurisdictions throughout the county to live in the neighborhood of their choice, reduce disparities in access to opportunity areas, and meet the needs of the region's current and future residents by:

a) Providing access to affordable housing to rent and own throughout the jurisdiction, with a focus on areas of high opportunity

b) Expanding capacity for moderate-density housing throughout the jurisdiction, especially in areas currently zoned for lower density single-family detached housing in the Urban Growth Area, and capacity for high-density housing, where appropriate, consistent with the Regional Growth Strategy

c) Evaluating the feasibility of, and implementing, where appropriate, inclusionary and incentive zoning to provide affordable housing; and

d) Providing access to housing types that serve a range of household sizes, types, and incomes, including 2+ bedroom homes for families with children and/or adult roommates and accessory dwelling units, efficiency studios, and/or congregate residences for single adults.

***Snohomish County Countywide Planning Policies (March 6, 2022) - Housing Policy HO-4***

The county and cities should implement policies that allow for the development of moderate density housing to help meet future housing needs, diversify the housing stock, and provide more affordable home ownership and rental opportunities. This approach should include code updates to ensure that zoning designations and allowed densities, housing capacity, and other restrictions do not preclude development of moderate density housing.

***Benton County Countywide Planning Policies (July 14, 2016) - Policy #15***

The County and Cities shall work together to provide housing for all economic segments of the population. All jurisdictions shall seek to create the conditions necessary for the construction of affordable housing, at the appropriate densities within the cities and County. The following actions shall be accomplished:

- Jointly quantify and project total Countywide housing needs by income level and housing type (i.e., rental ownership, senior, farm worker housing, group housing)
- Establish a mechanism whereby the housing efforts/programs of each jurisdiction address the projected Countywide need
- Address the affordable housing needs of very low, low, and moderate income households, and special needs individuals through the Comprehensive Housing Affordability Strategy
- Develop design standards for implementation within the Comprehensive Plan with special attention given to the residential needs of low to moderate income families.

***Kitsap County Countywide Planning Policies (October 2021) - Affordable Housing Policy 2***

AH-2 Recognizing that the marketplace makes adequate provision for those in the upper economic brackets, each jurisdiction shall develop some flexible combination of appropriately zoned land, regulatory incentives, financial subsidies, and/or innovating planning techniques to make adequate provision for the needs of middle and lower income persons.

a. Where possible, expand areas zoned for moderate density (“missing middle”) housing to bridge the gap between single-family and more intensive multi-family development

b. Incentivize a range of housing types, including transitional housing and supportive housing.

## Plan for and accommodate affordable housing for low- and very low-income households

These examples show regional strategies to plan for, encourage and incentivize housing for the lowest income households, recognizing that the market will not do it alone.

***Puget Sound Regional Council Vision 2050 (October 2020) - Multi-County Planning Policy H-4***

Address the need for housing affordable to low- and very low-income households, recognizing that these critical needs will require significant public intervention through funding, collaboration, and jurisdictional action.

***King County Countywide Planning Policies (December 21, 2022) - Housing Policy H-2***

Prioritize the need for housing affordable to households at or below 30 percent AMI (extremely low-income) by implementing tools such as:

- Increasing capital, operations, and maintenance funding;
- Adopting complementary land use regulations;
- Fostering welcoming communities, including people with behavioral health needs;
- Adopting supportive policies; and
- Supporting collaborative actions by all jurisdictions.

***King County Countywide Planning Policies (December 21, 2022) - Housing Policy H-14***

Prioritize the use of local and regional resources (e.g., funding, surplus property) for income-restricted housing, particularly for extremely low-income households, populations with special needs, and others with disproportionately greater housing needs. Consider projects that promote access to opportunity, anti-displacement, and wealth building for Black, Indigenous, and People of Color communities to support implementation of policy H-10.

***Chelan County Countywide Planning Policies (2017) - Housing Policy 5***

Policies addressing the need for affordable housing for all economic segments of the population and the adoption of parameters for the distribution of affordable housing.

> III. To the extent possible each plan should promote the construction of affordable housing, particularly for low and moderate income segments of the population.
>
> VI. Each community is encouraged to provide its fair share of housing affordable to low and moderate income households by promoting a balanced mix of diverse housing types.
>
> VIII. Consideration should be given to implementing innovative regulatory strategies which provide incentives for developers to provide housing affordable to low and moderate income households.
>
> IX. Recognizing the shrinking role of the Federal government in providing finances for housing, local governments should consider support of the existing public housing agency and/or the development of a county wide public housing authority with a broad base of public financial support from jurisdictions.
>
> X. Public entities own undeveloped land in various quantities. Some consideration should be given to assembling larger parcels suitable for affordable housing development through the use of land exchanges, the establishment of land trusts/banks or other suitable vehicles. Such parcels could then be sold to a public housing agency, at less than market rates, for the development of low-income housing.

***Kitsap County Countywide Planning Policies (September 27, 2021) - Policy AH-4***

Provision of affordable housing for households below 80% countywide median income should be focused within cities and unincorporated UGAs with easy access to transportation, employment, high opportunity areas, and other services.

## Support equitable homeownership

Homeownership is an important aspect of housing because it allows residents to gain equity, generate wealth as home prices appreciate and maintain financial stability because homeownership costs are consistent. For these reasons and others, counties may wish to encourage homeownership with countywide planning policies.

***Puget Sound Regional Council Vision 2050 (October 2020) - Multi-County Planning Policy H-5***

Promote homeownership opportunities for low-income, moderate income, and middle-income families and individuals while recognizing historic inequities in access to homeownership opportunities for communities of color.

***King County Countywide Planning Policies (December 21, 2022) - Housing Policy H-19***

Lower barriers to and promote access to affordable homeownership for extremely low-, very low-, and low--income, households. Emphasize:

a) Supporting long-term affordable homeownership opportunities for households at or below 80 percent AMI (which may require up-front initial public subsidy and policies that support diverse housing types)

b) Remedying historical inequities in and expanding access to homeownership opportunities for Black, Indigenous and People of Color communities.

***Pierce County Countywide Planning Policies (May 17, 2022) - Affordable Housing Policy 7***

Support and encourage homeownership opportunities for low-income, moderate-income, and middle-income families and individuals while recognizing historic inequities in access to homeownership opportunities for communities of color.

## Integrate planning for emergency shelters and permanent supportive housing

When a jurisdiction has a full spectrum of housing types, including emergency shelters, emergency housing and permanent supportive housing, a jurisdiction can better meet their communities housing needs as residents circumstances change over the course of their lives. Having policies in place at a countywide level to support those who most need it reduces other costs to the community and supports those in our communities who are struggling to find housing.

***King County Countywide Planning Policies (December 21, 2020) - Housing Policy H-12***

Identify sufficient capacity of land for housing including, but not limited to income restricted 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, duplexes, triplexes, and townhomes.

***Pierce County Countywide Planning Policies (May 17, 2022) - Affordable Housing Policy 3, 3.1 and 3.3***

Determine the extent of the need for housing affordable for all economic segments of the population, with special attention paid to the historically underserved, both existing and projected for its jurisdiction over the

planning period, and shall encourage the availability of housing affordable to all economic segments of the population for each jurisdiction.

3.1 Affordable housing needs not typically met by the private housing market should be addressed through more coordinated countywide and regional approaches/strategies.

3.3 Each jurisdiction should plan to accommodate a sufficient supply of permanent supportive housing as defined in RCW 36.70A.030 (16), foster care housing, and those requiring special needs housing (i.e., the elderly, developmentally disabled, chronically mentally ill, physically disabled, homeless, persons participating in substance abuse programs, persons with AIDS, and victims of domestic violence) that is equitably and rationally distributed throughout the County.

***Los Angeles County General Plan 2035 (May 17, 2022) - Policies 4.1-4.3***

Goal: A comprehensive system of services and housing that prevents and ends homelessness.

Policy 4.1: Provide support to individuals and households at risk of becoming homeless, including acutely low, extremely low, very low, and low income households, people transitioning out of incarceration, and transition age youth.

Policy 4.2: Connect people experiencing unsheltered homelessness with services to ensure health and safety, and transition them out of homelessness as soon as possible.

Policy 4.3: Assist people living in interim housing to stabilize their lives and transition into permanent affordable housing.

## Preserve existing housing

In addition to building new housing, preserving our existing affordable housing is key to meeting our future housing needs.

***Clark County Countywide Planning Policies (Adopted 2016) - Policy 2.2.9***

The county should take appropriate action to encourage the preservation and expansion of the current stock of federally subsidized affordable housing.

***Snohomish County Countywide Planning Policies (Updated February 23, 2022) - Policy HO-6***

The county and cities should implement policies and programs that encourage the rehabilitation and preservation of existing legally established, affordable housing for residents of all income levels, including but not limited to mobile/manufactured housing and single - room occupancy (SRO) housing.

***King County Countywide Planning Policies (December 21, 2021) - H-22***

Adopt and implement policies that protect housing stability for renter households; expand protections and supports for low-income renters and renters with disabilities.

## Mitigate racially disparate impacts, displacement and exclusion

Cities and counties must address racially disparate impacts in housing within their comprehensive plans. Aligning these efforts with countywide planning policies can help to create a regional strategy to address these impacts.

***Puget Sound Regional Council Vision 2050 (October 2020) - Multi-County Planning Policy H-3***

Achieve and sustain – through preservation, rehabilitation, and new development – a sufficient supply of housing to meet the needs of low-income, moderate-income, middle-income, and special needs individuals and households that is equitably and rationally distributed throughout the region.

***Puget Sound Regional Council Vision 2050 (October 2020) - Multi-County Planning Policy H-12***

Identify potential physical, economic, and cultural displacement of low-income households and marginalized populations that may result from planning, public investments, private redevelopment, and market pressure. Use a range of strategies to mitigate displacement impacts to the extent feasible.

***King County Countywide Planning Policies (December 21, 2021) - Housing Policy H-6***

Document the local history of racially exclusive and discriminatory land use and housing practices, consistent with local and regional fair housing reports and other resources. Explain the extent to which that history is still reflected in current development patterns, housing conditions, tenure, and access to opportunity. Identify local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing, including zoning that may have a discriminatory effect, disinvestment, and infrastructure availability. Demonstrate how current strategies are addressing impacts of those racially exclusive and discriminatory policies and practices.

***King County Countywide Planning Policies (April 6, 2022) - Housing Policy H-9***

Collaborate with populations most disproportionately impacted by housing cost burden in developing, implementing, and monitoring strategies that achieve the goals of this chapter. Prioritize the needs and solutions articulated by these disproportionately impacted populations.

***King County Countywide Planning Policies (December 21, 2021) - Housing Policy H-10***

Adopt intentional, targeted actions that repair harms to Black, Indigenous, and other People of Color households from past and current racially exclusive and discriminatory land use and housing practices (generally identified through Policy H-6). Promote equitable outcomes in partnership with communities most impacted.

***King County Countywide Planning Policies (April 6, 2022) - Housing Policy H-18***

Adopt inclusive planning tools and policies whose purpose is to increase the ability of all residents in jurisdictions throughout the county to live in the neighborhood of their choice, reduce disparities in access to opportunity areas, and meet the needs of the region's current and future residents by:

a) Providing access to affordable housing to rent and own throughout the jurisdiction, with a focus on areas of high opportunity;

b) Expanding capacity for moderate-density housing throughout the jurisdiction, especially in areas currently zoned for lower density single-family detached housing in the Urban Growth Area, and capacity for high-density housing, where appropriate, consistent with the Regional Growth Strategy;

c) Evaluating the feasibility of, and implementing, where appropriate, inclusionary and incentive zoning to provide affordable housing; and

d) Providing access to housing types that serve a range of household sizes, types, and incomes, including 2+ bedroom homes for families with children and/or adult roommates and accessory dwelling units, efficiency studios, and/or congregate residences for single adults.

***King County Countywide Planning Policies (December 21, 2021) - Housing Policy H-20***

Adopt policies and strategies that promote equitable development and mitigate displacement risk, 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 production and preservation; dedicated funds for land acquisition; manufactured housing community preservation, inclusionary zoning; community planning requirements; tenant protections; public land disposition policies; and land that may be used for affordable housing. Mitigate displacement that may result from planning efforts, large-scale private investments, and market pressure. Implement anti-displacement measures prior to or concurrent with development capacity increases and public capital investments.

***King County Countywide Planning Policies (December 21, 2021) - Development Patterns Policy 34***

Evaluate the potential physical, economic, and cultural displacement of residents and businesses in regional growth centers and high-capacity transit station areas, particularly for Black, Indigenous, and other People of Color communities; immigrants and refugees, low-income populations; disabled communities; and other communities at greatest risk of displacement. Use a range of strategies to mitigate identified displacement impacts.

***Pierce County Countywide Planning Policies (May 17, 2022) - Affordable Housing Policy 8***

Jurisdictions should identify potential physical, economic, and cultural displacement of low-income households and marginalized populations that may result from planning, public investments, private redevelopment, and market pressure, and use a range of strategies to prevent and minimize, the cultural and physical displacement and mitigate its impacts to the extent feasible.

8.1 Metropolitan Cities, Core Cities, and High Capacity Transit Communities will develop and implement strategies to address displacement in coordination with the populations identified of being at risk of displacement, including residents, local community groups, and neighborhood-based small business owners.

***Snohomish County Countywide Planning Policies (March 6, 2022) - HO-15***

Metropolitan cities, Core cities, and High Capacity Transit Communities, as defined by the Regional Growth Strategy in VISION 2050, shall develop and implement strategies to address displacement of historically marginalized populations, including residents identified in the report prescribed in HO-5, and neighborhood-based small business owners.

***Los Angeles County General Plan 2035 (May 17, 2022) - Policies 7.2-7.5***

Goal 7: Protection against residential displacement.

- Coordinate anti-displacement efforts across County departments through complementary policies, programs, and data sharing.
- Support permanent affordability policies and programs, including community land trusts, to ensure housing affordability in perpetuity.
- Implement tenant protections and monitor for efficacy.
- Facilitate the replacement of units damaged or destroyed in a disaster, and the health and safety of residents displaced by the disaster.

***Los Angeles County General Plan 2035 (May 17, 2022) - Policy 9.2***

Prioritize disadvantaged communities in the allocation of resources to maintain and improve the conditions of existing housing stock, including but not limited to the provision of financial assistance for senior and/or lower income homeowners to repair, improve, or modernize their homes and to remove health and safety hazards.

## Monitor housing development

Another component of a successful housing strategy is monitoring your success. The following example policies show how jurisdictions have planned to monitor their housing markets. The new 5-year implementation report in RCW 36.70A.130(9) makes monitoring the housing market more important to determine if and how local housing actions influence the housing market.

***King County Countywide Planning Policies (December 21, 2021) - Housing Policy H-25***

Monitor progress toward meeting countywide housing growth targets, countywide need, and eliminating disparities in access to housing and neighborhood choices. Where feasible, use existing regional and jurisdictional reports and monitoring tools and collaborate to reduce duplicative reporting. *(Full policy documented here.)*

***Pierce County Countywide Planning Policies (May 17, 2022) - Affordable Housing Policy 6***

Jurisdictions shall periodically monitor and assess their success in meeting the housing needs to accommodate their 20-year population allocation.

6.1 Jurisdictions should utilize the available data and analyses provided by federal, state, and local sources to monitor their progress in meeting housing demand as part of the required Growth Management Act comprehensive plan update process

6.2 Countywide housing allocations shall be monitored with each Buildable Land Report and evaluated to determine if countywide needs are being adequately met; the evaluation should identify all regulatory, programmatic, and financial measures taken to address the allocation need.

6.2.1 Each jurisdictions should provide, if available, the quantity of affordable housing units created, preserved, or rehabilitated since the previous Buildable Land Report.

6.2.2 Jurisdictions should consider using a consistent reporting template for their evaluations to facilitate the countywide monitoring and assessment.

6.3.3 In conjunction with the Buildable Lands Report, a report should be forwarded from GMCC to the Pierce County Regional Council (PCRC) addressing the progress in developing new affordable housing.

***Yakima County Countywide Planning Policy (Revised October 2003) - Policy E.3.10***

The County and cities will locally monitor the performance of their respective housing plans and make adjustments and revisions as needed to achieve the goal of affordable housing, particularly for middle and lower income persons.

***Snohomish County Countywide Planning Policies (March 6, 2022) - HO-5***

The cities and the county shall collaborate to report housing characteristics and needs in a timely manner for jurisdictions to conduct major comprehensive plan updates and to assess progress toward achieving CPPs on housing. The report shall be sufficiently easy to understand and use for planning and evaluation. To the extent made possible by the availability of valid data, this report shall, for the entire county and each jurisdiction:

a) Describe the measures that jurisdictions have taken (individually or collectively) to implement or support CPPs on housing, especially measures taken to support housing affordability.

b) Quantify and map existing characteristics that are relevant to the results prescribed in the CPPs on housing, including (but not limited to):

c) The supply of housing units, including subsidized housing, by type, tenure, affordability, and special needs populations served.

d) The availability and general location of existing affordable housing units and the distribution and location of vouchers and similar assistance methods.

e) The supply of land that is undeveloped, partially used/or has the potential to be developed or redeveloped for residential purposes.

f) Identify the number of housing units necessary to meet the various housing needs for the projected population of households of all incomes and special needs populations. The number of units identified for each jurisdiction will be utilized for planning purposes and to acknowledge the responsibility of all jurisdictions to plan for affordable housing within the regional context.

g) Evaluate the risk of physical and economic displacement of residents, especially low-income households and marginalized populations

***Los Angeles County, California Housing Element (May 17, 2022)***

Goal 12: Planning for and monitoring the long-term affordability of adequate housing.

Policy 12.1: Ensure collaboration among County departments and other agencies in the delivery of housing and related services.

Policy 12.3: Coordinate across County departments to track entitlements and ensure timely reporting of progress towards meeting affordable housing goals.

# Other policies

## Promote transit-oriented development

The following example policies articulate the mutually beneficial location of transit and higher density housing.

***Puget Sound Regional Council Vision 2050 (October 2020) - Multi-County Planning Policy H-7***

Expand the supply and range of housing at densities to maximize the benefits of transit investments, including affordable units, in growth centers and station areas throughout the region.

***King County Countywide Planning Policies (December 21, 2021) - Development Patterns Policy 31***

Focus housing and employment growth into designated regional growth centers, at levels consistent with the Regional Growth Strategy, and at densities that maximize high capacity transit.

***King County Countywide Planning Policies (December 21, 2021) - Development Patterns Policy 38***

Support the designation of local centers, such as city or neighborhood centers, transit station areas, or other activity nodes, where housing, employment, and services are accommodated in a compact form and at sufficient densities to support transit service and to make efficient use of urban land.

***Spokane County Countywide Planning Policies (December 13, 2023) - Affordable Housing Policy 6***

In conjunction with other policy topics, coordinate housing, transportation, and economic development strategies to ensure that sufficient land and densities for affordable housing are provided in locations readily accessible to employment centers.

## Adjust strategies to meet housing needs

While comprehensive plans are to be updated at a minimum every 10 years, continual evaluation of policies and regulations can ensure that housing strategies are evolving with housing needs and market trends.

***King County Countywide Planning Policies (December 21, 2021) - H-27***

Review and amend countywide and local housing strategies and actions when monitoring in Policy H-25 and H-26 indicates that adopted strategies are not resulting in adequate affordable housing to meet the countywide need. Consider amendments to land use policies and the land use map where they present a significant barrier to the equitable distribution of affordable housing.

***Thurston County Countywide Planning Policies (Adopted November 10, 2015) - Policy 8.6***

Regularly examine and modify policies that pose barriers to affordable housing.

# Appendix B: Emergency housing and PSH projections

The tables below show projected need by 2044 for emergency housing and PSH following the projection methods described above, as well as homelessness per capita and the number of existing PSH beds included in the calculations. They use the OFM Medium population projection for all counties unless otherwise noted.[102] These emergency housing and PSH projections account for baseline (2020) emergency housing beds and PSH units available according to the Washington Housing Inventory Count (HIC) prepared for HUD.

It is possible that counties have additional inventory not included in this count. This additional inventory may happen if a program does not accept public funds or if a new project has recently opened. For example, a faith-based organization may provide year-round shelter using private donations and not participate in homeless service data collection or funding, but this may still count as emergency housing. For PSH, an example of uncounted inventory may include health homes provided through Medicaid or managed care organizations. Counties should make efforts to verify current resources. Should a local count of emergency housing beds or PSH units result in a higher number than those presented here or in the HAPT, the difference between existing beds and units included in this methodology and beds and units known to the jurisdiction can be deducted from the net new need, so long as the difference is documented in the comprehensive plan.

## Projected emergency housing needed by county

| County | Total emergency housing bed need, 2044 medium population projection | Baseline (2020) emergency housing beds* | Net new emergency housing bed need by 2044 (using medium population projection) |
|---|---|---|---|
| Adams | 37 | 18 | 19 |
| Asotin | 44 | 9 | 35 |
| Benton | 298 | 168 | 130 |
| Chelan | 678 | 384 | 294 |
| Clallam | 581 | 144 | 437 |
| Clark | 4,311 | 490 | 3821 |
| Columbia | 2 | 1 | 1 |
| Cowlitz | 407 | 234 | 173 |
| Douglas | 73 | 40 | 33 |
| Ferry | 22 | 0 | 22 |
| Franklin | 331 | 181 | 150 |
| Garfield | 3 | 1 | 2 |
| Grant | 169 | 76 | 93 |
| Grays Harbor | 394 | 206 | 188 |
| Island | 378 | 116 | 262 |
| Jefferson | 614 | 58 | 556 |

[102] The Housing for All Planning Tool (HAPT) provides access to customized projections based on a selected population target within the OFM range. The methodology described in this report was applied to OFM's Low, Medium and High population projection for each county. The HAPT tool interpolates a projection value based on the user input. For example, if the user enters a selected population target that is halfway between the Medium and High OFM population projections, then the projected needs output for emergency housing will be halfway between Commerce's Medium and High projections.

| County | Total emergency housing bed need, 2044 medium population projection | Baseline (2020) emergency housing beds* | Net new emergency housing bed need by 2044 (using medium population projection) |
|---|---|---|---|
| King | 65,684 | 6,068 | 59616 |
| Kitsap | 1,761 | 481 | 1280 |
| Kittitas | 119 | 119 | 0 |
| Klickitat | 104 | 15 | 89 |
| Lewis | 538 | 60 | 478 |
| Lincoln | 13 | 12 | 1 |
| Mason | 306 | 217 | 89 |
| Okanogan | 141 | 43 | 98 |
| Pacific | 264 | 9 | 255 |
| Pend Oreille | 31 | 31 | 0 |
| Pierce | 8,672 | 1,454 | 7218 |
| San Juan | 34 | 0 | 34 |
| Skagit | 591 | 310 | 281 |
| Skamania | 84 | 21 | 63 |
| Snohomish | 10,599 | 788 | 9811 |
| Spokane | 4,184 | 1,192 | 2992 |
| Stevens | 97 | 56 | 41 |
| Thurston | 1,547 | 626 | 921 |
| Wahkiakum | 21 | 12 | 9 |
| Walla Walla | 129 | 129 | 0 |
| Whatcom | 1,283 | 775 | 508 |
| Whitman | 65 | 26 | 39 |
| Yakima | 1,890 | 572 | 1318 |

*These totals are estimated based on Housing Inventory Count data where a valid address is available. Counties should locally validate the number of available emergency housing resources.

## Projected PSH units needed by county, HMIS model

| County | High population projection 2044 | Medium population projection 2044 | Low population projection 2044 | High population projection 2050 | Medium population projection 2050 | Low population projection 2050 |
|---|---|---|---|---|---|---|
| Adams | 203 | 196 | 170 | 216 | 210 | 177 |
| Asotin | 215 | 185 | 171 | 228 | 190 | 174 |
| Benton | 2,745 | 2,538 | 2,252 | 2,982 | 2,732 | 2,392 |
| Chelan | 1,058 | 912 | 816 | 1142 | 941 | 821 |
| Clallam | 806 | 740 | 676 | 811 | 737 | 656 |
| Clark | 7,872 | 7,154 | 6,262 | 8,591 | 7,674 | 6,498 |
| Columbia | 33 | 30 | 27 | 33 | 29 | 25 |

| County | High population projection 2044 | Medium population projection 2044 | Low population projection 2044 | High population projection 2050 | Medium population projection 2050 | Low population projection 2050 |
|---|---|---|---|---|---|---|
| Cowlitz | 1,354 | 1,244 | 1,149 | 1,393 | 1,269 | 1,151 |
| Douglas[103] | 0 | 0 | 0 | 0 | 0 | 0 |
| Ferry | 61 | 52 | 44 | 64 | 52 | 42 |
| Franklin | 2,066 | 1,735 | 1,476 | 2,359 | 1,911 | 1,569 |
| Garfield | 6 | 6 | 5 | 6 | 5 | 4 |
| Grant | 869 | 771 | 686 | 930 | 812 | 701 |
| Grays Harbor | 1,137 | 1,014 | 927 | 1,170 | 1,021 | 915 |
| Island | 904 | 819 | 707 | 958 | 856 | 715 |
| Jefferson | 284 | 243 | 220 | 303 | 251 | 223 |
| King | 43,878 | 42,952 | 42,377 | 49,821 | 45,044 | 41,716 |
| Kitsap | 3,062 | 2,606 | 2,345 | 3,287 | 2,678 | 2,364 |
| Kittitas | 623 | 566 | 499 | 671 | 599 | 518 |
| Klickitat | 144 | 128 | 116 | 150 | 131 | 115 |
| Lewis | 926 | 847 | 761 | 961 | 869 | 764 |
| Lincoln | 148 | 128 | 114 | 158 | 132 | 115 |
| Mason | 1040 | 957 | 837 | 1090 | 995 | 834 |
| Okanogan | 481 | 403 | 369 | 511 | 408 | 368 |
| Pacific | 215 | 195 | 168 | 220 | 196 | 160 |
| Pend Oreille | 91 | 77 | 68 | 96 | 77 | 66 |
| Pierce | 20,915 | 18,805 | 17,468 | 22,596 | 19,926 | 18,267 |
| San Juan | 57 | 48 | 42 | 65 | 51 | 43 |
| Skagit | 1,747 | 1,527 | 1,402 | 1,886 | 1,595 | 1,440 |
| Skamania | 67 | 61 | 56 | 66 | 59 | 52 |
| Snohomish | 14,535 | 13,202 | 12,161 | 15,881 | 14,266 | 12,908 |
| Spokane | 6,014 | 5,384 | 4,914 | 6,330 | 5,541 | 4,961 |
| Stevens | 500 | 422 | 382 | 546 | 440 | 392 |
| Thurston | 3,521 | 3,249 | 2,947 | 3,766 | 3,433 | 3,082 |
| Wahkiakum | 103 | 92 | 79 | 111 | 96 | 80 |
| Walla Walla | 787 | 703 | 649 | 810 | 707 | 643 |
| Whatcom | 3,594 | 3,227 | 2,951 | 3,894 | 3,426 | 3,067 |
| Whitman | 324 | 294 | 293 | 345 | 309 | 308 |
| Yakima | 4,345 | 3,876 | 3,550 | 4,594 | 3,999 | 3,607 |

[103] Douglas County does not report any people likely eligible for PSH, chronic homelessness or people with disabilities within HMIS. This is most likely a data quality issue and it is likely some level of PSH need exists in the county.

## Projected PSH units needed by county, Snapshot model

| County | High population projection 2044 | Medium population projection 2044 | Low population projection 2044 | High population projection 2050 | Medium population projection 2050 | Low population projection 2050 |
|---|---|---|---|---|---|---|
| Adams | 207 | 200 | 174 | 218 | 212 | 179 |
| Asotin | 247 | 218 | 204 | 247 | 209 | 193 |
| Benton | 2,825 | 2,597 | 2,331 | 3,030 | 2,769 | 2,445 |
| Chelan | 1,035 | 887 | 789 | 1,120 | 927 | 805 |
| Clallam | 815 | 751 | 687 | 815 | 744 | 663 |
| Clark | 8,166 | 7,393 | 6,531 | 8,779 | 7,819 | 6,662 |
| Columbia | 32 | 29 | 26 | 32 | 28 | 25 |
| Cowlitz | 1,487 | 1,378 | 1,278 | 1,470 | 1,344 | 1,227 |
| Douglas[104] | 0 | 0 | 0 | 0 | 0 | 0 |
| Ferry | 64 | 54 | 46 | 65 | 53 | 43 |
| Franklin | 2,128 | 1,804 | 1,544 | 2,384 | 1,951 | 1,608 |
| Garfield | 6 | 5 | 4 | 6 | 5 | 4 |
| Grant | 910 | 813 | 728 | 957 | 838 | 725 |
| Grays Harbor | 1,235 | 1,113 | 1,027 | 1,230 | 1,079 | 974 |
| Island | 924 | 833 | 725 | 971 | 865 | 726 |
| Jefferson | 286 | 247 | 223 | 305 | 254 | 225 |
| King | 43,877 | 42,993 | 42,393 | 49,844 | 44,880 | 41,746 |
| Kitsap | 3,105 | 2,646 | 2,385 | 3,310 | 2,700 | 2,381 |
| Kittitas | 630 | 570 | 506 | 676 | 602 | 522 |
| Klickitat | 150 | 135 | 122 | 154 | 135 | 119 |
| Lewis | 968 | 890 | 807 | 985 | 893 | 789 |
| Lincoln | 153 | 133 | 119 | 161 | 134 | 117 |
| Mason | 1,136 | 1,048 | 929 | 1,148 | 1,048 | 886 |
| Okanogan | 522 | 445 | 411 | 535 | 431 | 393 |
| Pacific | 236 | 217 | 189 | 232 | 210 | 172 |
| Pend Oreille | 97 | 84 | 75 | 99 | 81 | 70 |
| Pierce | 22,344 | 20,142 | 18,882 | 23,401 | 20,724 | 19,116 |
| San Juan | 57 | 48 | 41 | 65 | 51 | 43 |
| Skagit | 1,831 | 1,607 | 1,479 | 1,933 | 1,642 | 1,485 |
| Skamania | 66 | 60 | 54 | 66 | 59 | 51 |
| Snohomish | 15,954 | 14,567 | 13,506 | 16,755 | 15,014 | 13,714 |
| Spokane | 6,357 | 5,721 | 5,252 | 6,525 | 5,728 | 5,146 |

[104] Douglas County does not report any people likely eligible for PSH, chronic homelessness or people with disabilities within HMIS. This is most likely a data quality issue and it is likely some level of PSH need exists in the county.

| County | High population projection 2044 | Medium population projection 2044 | Low population projection 2044 | High population projection 2050 | Medium population projection 2050 | Low population projection 2050 |
|---|---|---|---|---|---|---|
| Stevens | 564 | 488 | 448 | 584 | 479 | 432 |
| Thurston | 3,877 | 3,591 | 3,305 | 3,975 | 3,635 | 3,291 |
| Wahkiakum | 120 | 109 | 97 | 120 | 106 | 90 |
| Walla Walla | 815 | 727 | 672 | 828 | 719 | 658 |
| Whatcom | 3,773 | 3,416 | 3,128 | 3,995 | 3,535 | 3,182 |
| Whitman | 330 | 300 | 300 | 348 | 312 | 312 |
| Yakima | 4,668 | 4,198 | 3,897 | 4,779 | 4,189 | 3,807 |

## Homelessness per capita

| County | Homelessness* per 10,000 people, 2020 | Projected homelessness per 10,000 people, 2044** | County | Homelessness* per 10,000 people, 2020 | Projected homelessness per 10,000 people, 2044** |
|---|---|---|---|---|---|
| Adams | 86 | 179 | Lewis | 394 | 146 |
| Asotin | 363 | 97 | Lincoln | 120 | 111 |
| Benton | 156 | 87 | Mason | 433 | 164 |
| Chelan | 279 | 139 | Okanogan | 371 | 138 |
| Clallam | 324 | 195 | Pacific | 398 | 97 |
| Clark | 212 | 128 | Pend Oreille | 355 | 147 |
| Columbia | 351 | 77 | Pierce | 403 | 273 |
| Cowlitz | 501 | 179 | San Juan | 161 | 71 |
| Douglas | 196 | 164 | Skagit | 304 | 173 |
| Ferry | 226 | 97 | Skamania | 324 | 171 |
| Franklin | 229 | 131 | Snohomish | 270 | 143 |
| Garfield | 368 | 85 | Spokane | 446 | 145 |
| Grant | 258 | 162 | Stevens | 407 | 94 |
| Grays Harbor | 415 | 104 | Thurston | 420 | 151 |
| Island | 119 | 86 | Wahkiakum | 459 | 162 |
| Jefferson | 224 | 83 | Walla Walla | 359 | 137 |
| King | 222 | 241 | Whatcom | 353 | 134 |
| Kitsap | 234 | 173 | Whitman | 171 | 155 |
| Kittitas | 166 | 90 | Yakima | 468 | 324 |
| Klickitat | 255 | 130 | | | |

* Based on the higher count of either adjusted HMIS or Snapshot as described in this methodology.
** Using the medium population projections.

## 2020 PSH beds

| County | Number of PSH beds in 2020 | County | Number of PSH beds in 2020 |
|---|---|---|---|
| Adams | 0 | Lewis | 58 |
| Asotin | 0 | Lincoln | 0 |
| Benton | 145 | Mason | 2 |
| Chelan | 54 | Okanogan | 10 |
| Clallam | 50 | Pacific | 26 |
| Clark | 571 | Pend Oreille | 0 |
| Columbia | 0 | Pierce | 1038 |
| Cowlitz | 65 | San Juan | 0 |
| Douglas | 0 | Skagit | 62 |
| Ferry | 0 | Skamania | 5 |
| Franklin | 22 | Snohomish | 1749 |
| Garfield | 0 | Spokane | 937 |
| Grant | 0 | Stevens | 0 |
| Grays Harbor | 88 | Thurston | 180 |
| Island | 18 | Wahkiakum | 0 |
| Jefferson | 16 | Walla Walla | 63 |
| King | 6201 | Whatcom | 404 |
| Kitsap | 114 | Whitman | 8 |
| Kittitas | 1 | Yakima | 228 |
| Klickitat | 27 | | |