

Accommodating Affordable Housing Under GMA



Kitsap County's Perspective

Background

Housing under GMA Goals (RCW 36.70A.020)

**GMA
Goal 4**

Plan for and accommodate

Encourage the availability of

1990

2021

The Housing Continuum



Background

GMA Housing Element (RCW 36.70A.070(2)(a))

Inventory and Analysis of needs

Inventory of existing housing

Detailed Projections

Numbers from Commerce

All income bands
Emergency housing

Moderate

80%-120%

Low

50%-80%

Very low

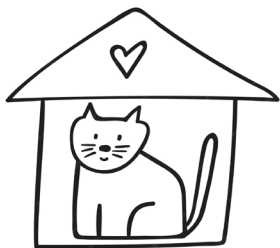
30%-50%

Extremely low 0%-30%

Emergency housing

Emergency shelter

Permanent supportive housing



EVERY CAT
NEEDS A HOME

Background

GMA Housing Element (RCW 36.70A.070(2)(c))

Land Capacity Analysis

Moderate

80%-120%

Low

50%-80%

Very low

30%-50%

Extremely low

0%-30%

Emergency housing

Emergency shelter

Permanent supportive housing

Sufficient Capacity

*All income bands
Emergency housing*



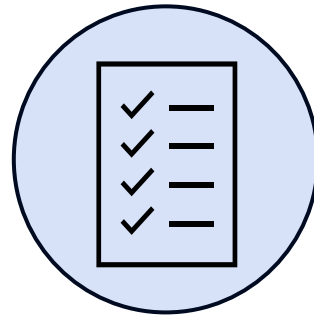
Background

GMA Housing Element (RCW 36.70A.070(2)(d))

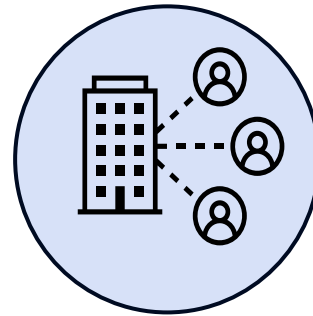
Make Adequate Provisions
for existing and projected housing needs



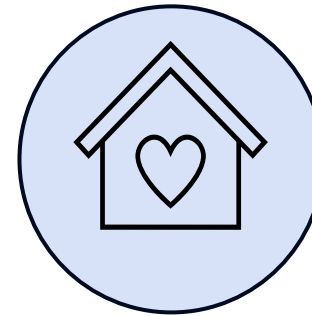
Consider all
income bands



Document
actions



Consider
employment

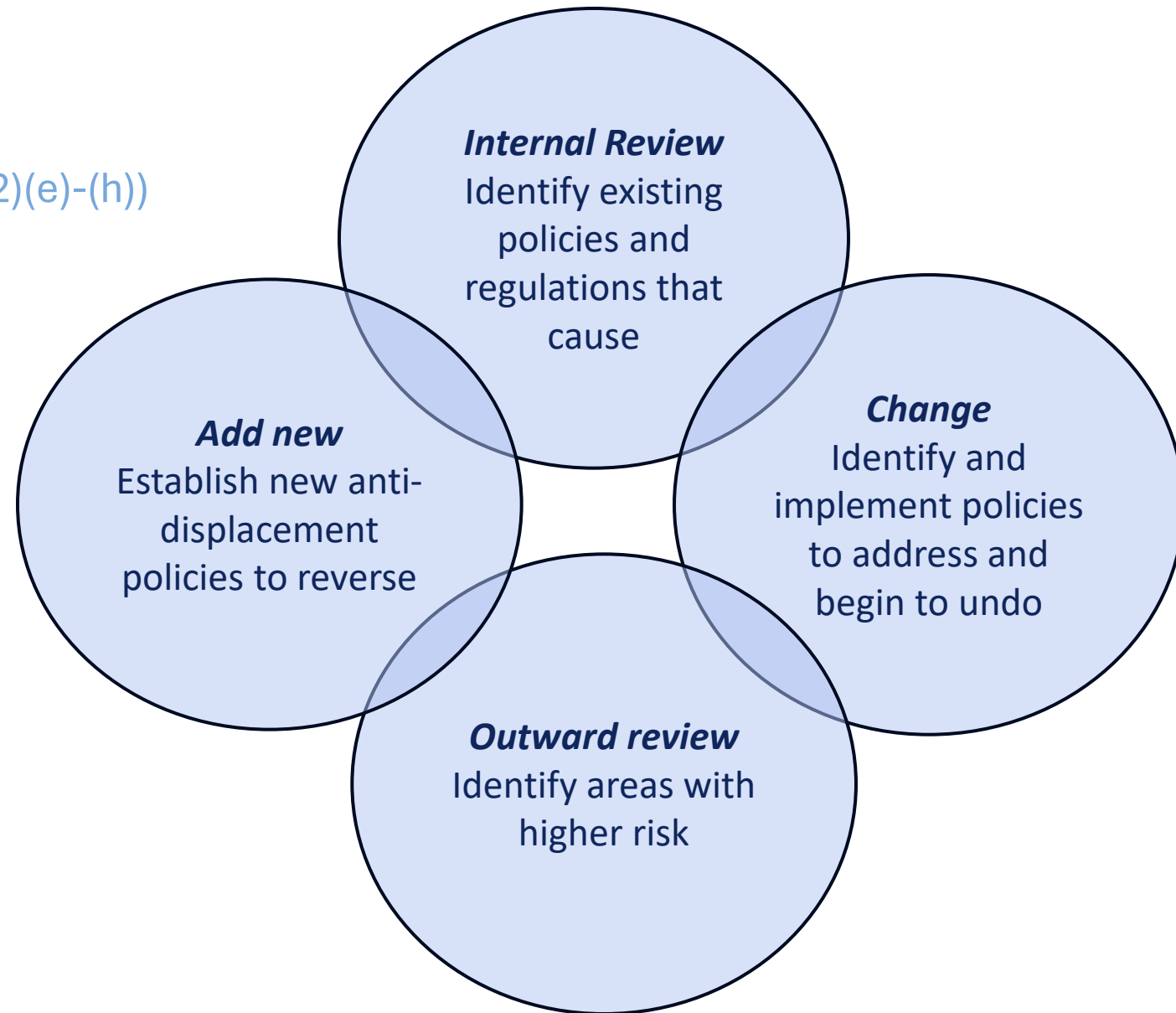


Consider
ADUs

Background

GMA Housing Element (RCW 36.70A.070(2)(e)-(h))

Racially disparate impacts
Displacement
Exclusion



Kitsap County 2024 Update

County Housing Need and Land Capacity Analysis

Zone Category	Typical housing types allowed	Lowest potential income level served		Assumed affordability level for capacity analysis
		Market rate	With subsidies and/or incentives	
Low Density	Detached single-family homes	Higher income (>120% AMI)	Not typically feasible at scale*	Higher income (>120% AMI)
Moderate Density	Townhomes, duplex, triplex, quadplex	Moderate income (81-100%, 101-120% AMI)	Not typically feasible at scale*	Moderate income (81-120% AMI)
Low-Rise Multifamily	Walk-up apartments, condominiums (2-3 floors)	Low income (51-80% AMI)	Extremely low and very low income (0-50% AMI)	Low Income (0-80% AMI) and PSH
Mid-Rise Multifamily	Apartments, condominiums	Low income (51-80% AMI)	Extremely low and very low income (0-50% AMI)	Low income (0-80% AMI) and PSH
ADUs (all zones)	Accessory Dwelling Units on developed residential lots	Low income (51-80% AMI)	N/A	Low income (51-80% AMI) – Group with Low-Rise and/or Mid-Rise Multifamily



Kitsap County 2024 Update

County Land Capacity Analysis

- C – increased from 10-30 to 19-60 dua
- UH – increased 19-30 to 19-60 dua
- UM – increased 10-18 to 10-30 dua
- UL attached – increased 9 to 14 dua
- Height limits increased
- Parking requirements reduced
- ADU incentives

Category	Zone Capacity under Alternative 1 (no change)	Zone Capacity under Preferred Alternative
Low-rise MF	78	1,949
Mid-rise MF	1,587	4,238
Total	1,665	6,187

Table 11. Preferred Alternative Capacity Relative to Projected Housing Need

Income Level (% AMI)	Projected Housing Need	Zone Categories Serving These Needs	Aggregated Housing Needs ¹	Total Capacity	Capacity Surplus (Deficit)
0-30% PSH	1,214	Low-Rise Multifamily, Mid-Rise Multifamily, ADUs	7,747 (non-pipeline) + 607 (pipeline) = 8,354	6,187 (non-pipeline) + 607 (pipeline) + 381 ADU = 7,175	(1,179)
0-30% Non-PSH	2,768				
31-50%	2,376				
51-80%	1,996				
81-100%	1,028	Moderate Density	2,040	1,874	(166)
101-120%	1,012				
>120%	4,103	Low Density	2,342 (non-pipeline) + 1,761 (pipeline) = 4,103	2,418 (non-pipeline) + 1,761 (pipeline) = 4,179	76
Total	14,497		12,129 (non-pipeline) + 2,368 (pipeline) = 14,497	13,228 (including 2,368 pipeline units and 381 ADUs)	(1,269)

Kitsap County 2024 Update

Adequate Provisions

**Kitsap County
Comprehensive Plan**

Appendix A
Housing Element Technical
Analysis

Appendix B
Housing Availability and
Affordability Analysis



Explained how allocations were made and preferred alternative selected.
Explained how zones accommodated housing types and which housing types accommodated income bands



Identified trends that could show barriers.
Identified regulatory and other items that could be barriers. Used Commerce checklists.



Evaluated local jobs and wages compared with housing options



Evaluated barriers from existing ADU regulations and options to reducing barriers

KAPO v. Kitsap County

Futurewise appeal, CPSGMHB Case No. 25-3-0005c



Issue 8 – Did the County fail to identify sufficient land capacity for all housing income groups and fail to make adequate provisions

Issue 9 – Did the UGA expansions violate GMA?

Issue 10 – Will the update reduce rural growth rates?

Issue 11 – Did the County implement measures to reduce wildfire hazards?

Issue 12 – Did the County fail to designate ALLTS?

Issue 13 – Did the County fails to protect surface and groundwater from unlawful withdrawals?

KAPO v. Kitsap County

Futurewise appeal – Housing Capacity & Adequate provisions

- Considered capacity (#s) and adequate provisions (analysis) together
- No *de minimus* exception
- Cannot fix with regulations over time (contrary to prior population capacity case law)
- Numbers must match in plans

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KAPO v. Kitsap County

Futurewise appeal – the fix



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0-30% PSH	1,214	Low-Rise Multifamily, Mid-Rise Multifamily, ADUs	8,354	8,379 (7,998 + 381 ADU units = 8,379)	25
0-30% Non-PSH	2,768				
31-50%	2,376				
51-80%	1,996				
81-100%	1,028	Moderate Density	2,040	2,361	321
101-120%	1,012				

Futurewise v. Mercer Island

CPSGMHB Case No. 25-3-0003

Insufficient
capacity (?)

		0-30%					
	Total	non-PSH	PSH	>30%-50%	>50%-80%	>80%-100%	>100%-120%
Need	1216	339	178	202	488	4	5
Capacity	1073	1073					

Insufficient
availability

Virtually all capacity would
need to be subsidized under
80% AMI

No adequate
provisions

Existing incentive program has
only resulted in 102 affordable
units.

“Vague aspirations to generate unspecified quantities of affordable housing are in sufficient in a post-ESSHB 1220 world.”

Futurewise v. Mercer Island

The Fix

Capacity

Analysis

Adequate
provisions

Figure 9. Mercer Island Housing Units Requiring New Subsidies or Incentives

Affordability Level	Zone Categories Serving These Needs	Allocated Housing Need (Units)	Total Housing Capacity (Units)	Mercer Island Capacity Surplus or Deficit (Units)	Units Requiring New Subsidies or Incentives
Extremely Low Income (0-30% AMI PSH)	Low-Rise, Mid-Rise	178	0	(178)	(178)
Extremely Low Income (0-30% AMI excl. PSH)	Low-Rise, Mid-Rise	339	7	(332)	(332)
Very Low Income (>30-50% AMI)	Low-Rise, Mid-Rise	202	390	188	0
Low Income (>50-80% AMI)	Moderate Density, Low-Rise, Mid-Rise, ADUs	473	1,698	1,225	0
Moderate Income (>80-100% AMI)	Moderate Density, Low-Rise, Mid-Rise, ADUs	0	583	583	0
High Income (>100-120% AMI)	Moderate Density, Low-Rise, Mid-Rise	0	130	130	0
Very High Income (>120% AMI)	Low Density	0	356	356	0
Total		1,192	3,164	1,972	(510)

McGuire v. City of Port Townsend

WWGMHB Case No. 26-2-0017



Three income
bands analyzed,
no deficit found:

- Under 80%
- 80-120%
- 120%+

Aggregation has obscured the
distinct needs of the very low- and
extremely low-income households.

Policy and regulatory changes alone
are insufficient without an analysis
of whether they can realistically
serve the needs

Over
aggregation

Insufficient
analysis

No adequate
provisions

Turner v. City of Anacortes

WWGMHB Case No. 26-2-0001c

No
aggregation

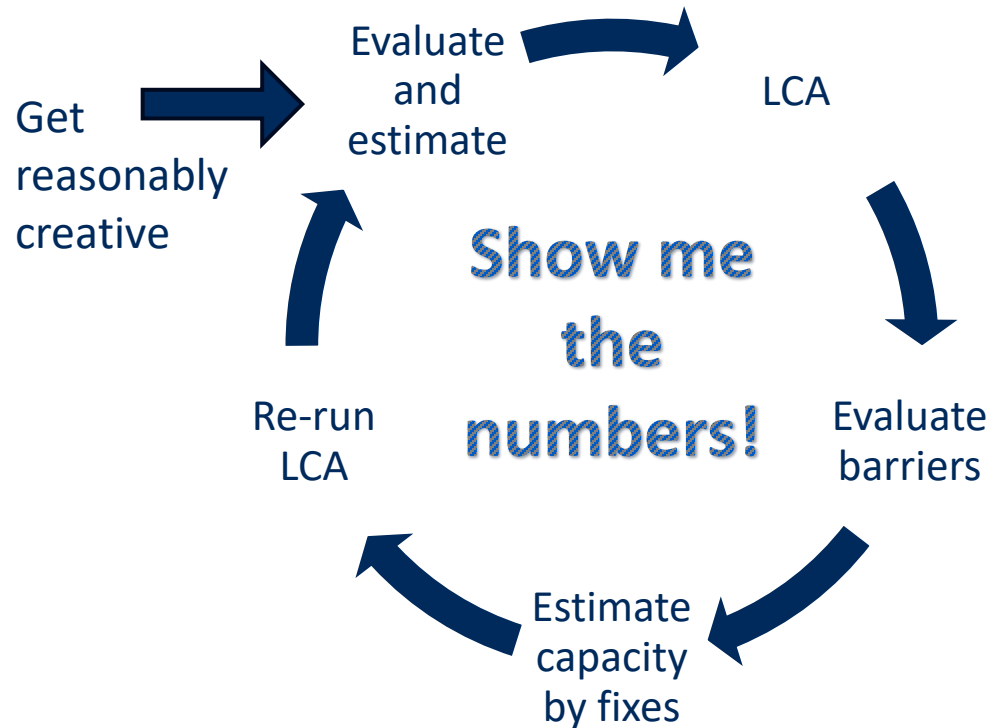
All income bands analyzed
no deficit found

Petitioners do not appear to have supported their
allegations of insufficient analysis regarding
subsidies and incentives.



Key Takeaways

Housing Capacity & Adequate provisions



- Housing capacity must be equal to or exceed targets.
- Population over-capacity is second to housing capacity.
- Do not aggregate. Analyze inventory by income band. Critically analysis Commerce guidance that appears contrary to GMA.
- If have incentives/subsidies, use historical data to inform likely future availability.
- Identify the # of housing units that will require subsidies or incentives to be available at the income band.
- Adequate provisions must not only address current capacity but be used to inform future actions.
- Providing adequate capacity and making adequate provisions is due with periodic update.

Questions?

