Appendix 5

Housing

Background

This appendix represents the data and analysis for population growth and housing that informed the development of PlanSpokane 2046, the Periodic Update to the Comprehensive Plan. Additional components to meet state requirements are still under development and will be added to this appendix when available.

Version: 8/05/2026

Spokane County Population Projections and Allocation

1. BOCC Resolution 2024-0180 Setting Countywide Population Forecast
2. BOCC Resolution 2024-0348 Setting the Population Allocation to Cities
3. BOCC Resolution 2025-0033 Setting the HAPT Method
4. BOCC Resolution 2026-0375 Setting the HAPT Input and Allocation

Resolution No.: 24-0180

BEFORE THE BOARD OF COUNTY COMMISSIONERS
OF SPOKANE COUNTY, WASHINGTON

IN THE MATTER OF CONSIDERING THE RECOMMENDATION OF THE STEERING COMMITTEE OF ELECTED OFFICIALS REGARDING THE 20-YEAR POPULATION ALLOCATION FOR THE YEARS 2026-2046 FOR STUDY PURPOSES)	**RESOLUTION**

WHEREAS, pursuant to the provisions of RCW 36.32.120(6), the Board of County Commissioners of Spokane County, Washington, hereinafter referred to as the "Board," has the care of County property and the management of County funds and business; and

WHEREAS, pursuant to the provisions of chapter 36.70.040 RCW, the Board has created a Planning Department, hereinafter referred to as the "Department", and a Planning Commission, hereinafter referred to as the "Commission" (Resolution No. 76-698 as amended by Resolution 23-0057); and

WHEREAS, pursuant to RCW 36.70A.210, the Steering Committee of Elected Officials ("Steering Committee") was established by interlocal agreement (Resolution 1994-1686, and as amended thereafter from time to time) to assist in the development of the Countywide Planning Policies and perform other duties including but not limited to providing recommendations to the Board of County Commissioners on the same; and

WHEREAS, the Planning Technical Advisory Committee (PTAC), consisting of technical staff from the various jurisdictions, is tasked with providing a report and recommendation to the Steering Committee on proposed amendments to the Countywide Planning Policies; and

WHEREAS, pursuant to the provisions of chapters 36.70 and 36.70A RCW, the Board adopted a Comprehensive Plan for Spokane County on November 5, 2001, (Board Resolution 1-1059 and 1-1060), which has been thereafter amended from time to time; and

WHEREAS, pursuant to the provisions of chapters 36.70 and 36.70A RCW, the Board on May 25, 2004, under Spokane County Resolution No. 04-0461, adopted a new Zoning Code to implement the goals and policies of the Comprehensive Plan and said regulation becoming effective June 1, 2004, which has been thereafter amended from time to time; and

WHEREAS, in accordance with RCW 36.70A.130, the County must review and update its comprehensive plan and development regulations every ten years, with the next update due by 2026; and

WHEREAS, pursuant to RCW 36.70A, the County and the cities within it must update their comprehensive plans based on a countywide population for the 20-year planning period as projected by the Office of Financial Management; and

WHEREAS, the Office of Financial Management makes population projections at the low, mid, and high ranges; and

WHEREAS, as the regional government, the County is tasked with the adoption of the Countywide Planning Policies, a part of which includes the adoption of the Countywide Population Projection as well as sub-allocations of population to the cities within the County; and

WHEREAS, the County has not yet undertaken a full SEPA analysis of the impact of the adoption of certain population number, but desires to study the same; and

WHEREAS, the adoption of a number for study purposes is exempt under SEPA (WAC 197-11-800(17)); and

WHEREAS, PTAC met on several occasions to study and consider the Office of Financial Management's projections for Spokane County for the period of 2026-2046; and

WHEREAS, based upon their deliberation and study, PTAC recommended to the SCEO adoption of the mid-range projection of 654,665 as provided in **Attachment A**; and

WHEREAS, on January 24, 2024, the Steering Committee met at a duly noticed public hearing to consider the PTACs recommendation on the countywide population projection; and

WHEREAS, after consideration and deliberation and opening the matter up for public testimony, the Steering Committee of Elected Officials voted to recommend to the Board of County Commissioners the adoption of the OFM mid-range projection for the Countywide Population projection as provided in **Attachment B.**

NOW THEREFORE BE IT RESOLVED by the Board of County Commissioners of Spokane County, that the countywide population projection be preliminary set at 654,665 for the purposes of further study as set forth in **Attachments A and B,** which represents the mid-range projection forecast by the Washington State Office of Financial Management and incorporates the analysis set forth in Attachment A as findings of fact as if fully set forth herein.

BE IT FURTHER RESOLVED by the Board of County Commissioners of Spokane County, that the preliminary countywide population projection of 654,665 for the 2026-2046 planning period be incorporated into, as a part of the appendices of, the Countywide Planning Policies.

PASSED AND ADOPTED this 26th day of March, 2024.

BOARD OF COUNTY COMMISSIONERS
OF SPOKANE COUNTY, WASHINGTON

Mary L. Kuney

Mary L. Kuney, Chair

Josh Kerns, Vice-Chair

Al French

Al French, Commissioner

Amber Waldref

Amber Waldref, Commissioner

ATTEST:

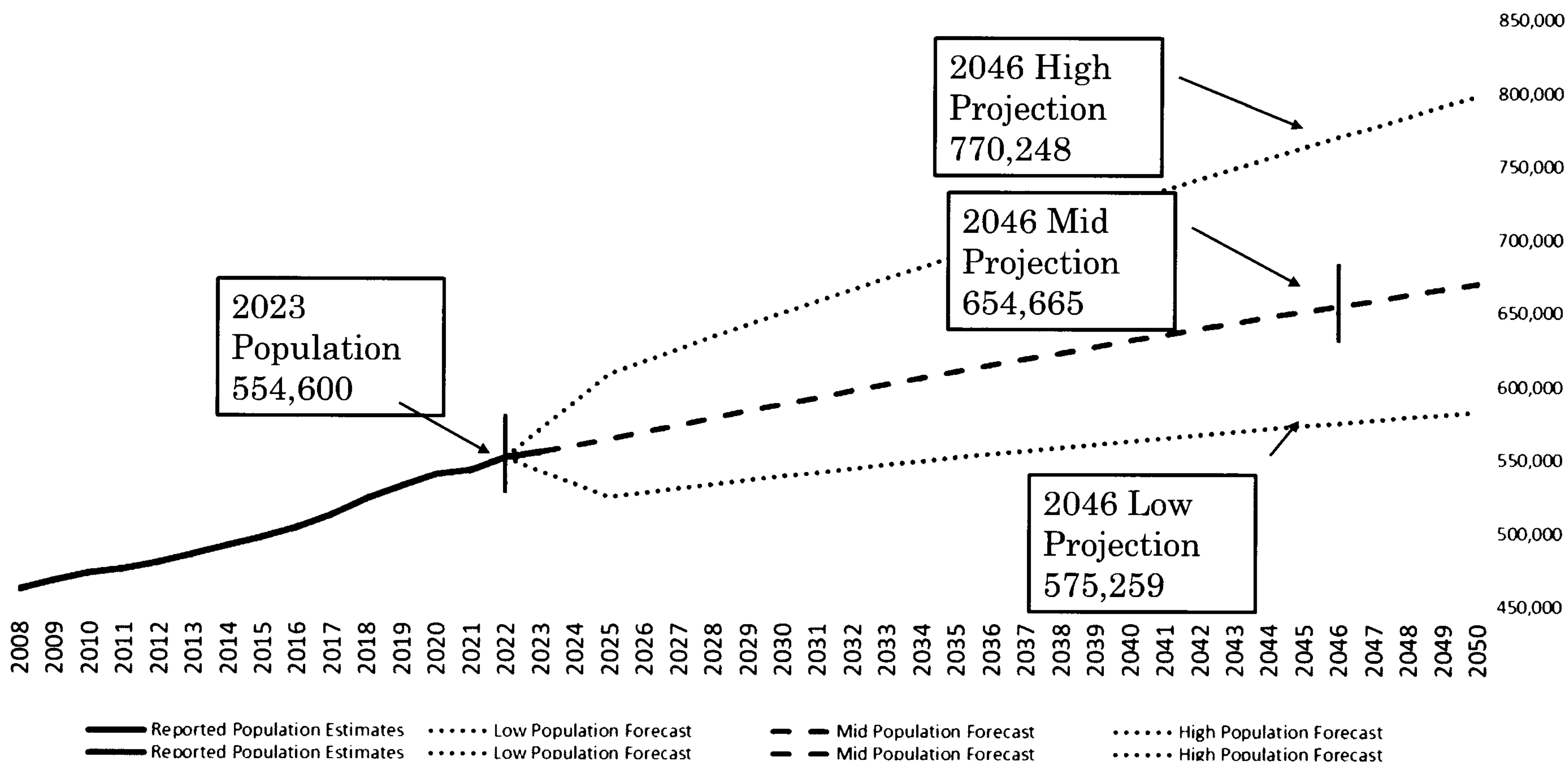
Ginna Vasquez

Ginna Vasquez, Clerk of the Board

ABSENT

Chris Jordan, Commissioner

2022 Spokane County Growth Estimates (Low, Mid, High) by WA Office of Financial Management



Submit to Clerk of the Board with available supporting materials (Resolutions, Agreements, Presentations, etc.)

AGENDA SHEET

SUBMITTING DEPARTMENT: Building & Planning

CONTACT PERSON: Scott Chesney, Jessica Pilgrim, Laurie Carver

PHONE NUMBER: 477-7212, 509-477-3641, 509-477-7127

CHECK TYPE OF MEETING BELOW:	***BELOW FOR CLERK'S USE ONLY:***	
☒	Clerk's Resolution No.	24-0180
	Approved:	Majority/Unanimous
	Denied:	Majority/Unanimous
	Renews/Amends No.	
	Public Works No.	
	Purchasing Dept. No.	

***AGENDA TITLE** (please provide a reasonably descriptive agenda title for this item:* Washington State Office of Financial Management Population Projections for 2026 County Comprehensive Plan Update

***DESCRIPTIVE SUMMARY** (please provide anticipated fiscal and budgetary information & reason for request):* An update of the Spokane County Comprehensive Plan for 2026 requires planning staff to evaluate urban and rural growth patterns to accommodate growth over a 20-year horizon. Population projections from the Washington State OFM are recognized as reliable by all county cities and towns and county planning staff. The Planning Technical Advisory Committee (PTAC) reviewed and made a recommendation to the Steering Committee of Elected Officials (SCEO) that the OFM "medium" values for population growth were reasonable for planning purposes. The SCEO agreed and acted to recommend this number to the BoCC. Staff is asking for BoCC direction to apply this number for planning analyses that will guide modification of the Urban Growth Area boundary for 2026.

***FISCAL IMPACT** (please provide anticipated fiscal and budgetary impact, with amount and source of funds, if applicable):* N/A

***REQUESTED BOARD ACTION** (if any):* Adoption of resolution setting a population projection for planning purposes

Other County Departments Impacted - List any other departments that were notified in advance of this agenda item: Legal

This Item will need to be codified in the Spokane County Code: No

Resolution No.: 24 - 0348 -

BEFORE THE BOARD OF COUNTY COMMISSIONERS
OF SPOKANE COUNTY, WASHINGTON

IN THE MATTER OF CONSIDERING THE RECOMMENDATION OF THE STEERING COMMITTEE OF ELECTED OFFICIALS REGARDING THE INTIAL FIRST-ROUND POPULATION FORECAST AND JURISDICTIONAL SPECIFIC POPULATION ALLOCATION OF 2026-2046 FOR STUDY PURPOSES	)	**RESOLUTION**

WHEREAS, pursuant to the provisions of RCW 36.32.120(6), the Board of County Commissioners of Spokane County, Washington, hereinafter referred to as the "Board," has the care of county property and the management of county funds and business; and

WHEREAS, pursuant to the provisions of Chapter 36.70.040 RCW, the Board has created a Planning Department, hereinafter referred to as the "Department," and a Planning Commission, hereinafter referred to as the "Commission" (Resolution No. 76-698 as amended by Resolution 23-0057); and

WHEREAS, pursuant to RCW 36.70A.210, the Steering Committee of Elected Officials ("Steering Committee") was established by interlocal agreement (Resolution 1994-1686, and as amended thereafter from time to time) to assist in the development of the Countywide Planning Policies and perform other duties, including but not limited to providing recommendations to the Board of County Commissioners on the same; and

WHEREAS, the Planning Technical Advisory Committee (PTAC), consisting of technical staff from the various jurisdictions, is tasked with providing a report and recommendation to the Steering Committee on proposed amendments to the Countywide Planning Policies; and

WHEREAS, pursuant to the provisions of chapters 36.70 and 36.70A RCW, the Board adopted a Comprehensive Plan for Spokane County on November 5, 2001 (Board Resolutions 1-1059 and 1-1060), which has been thereafter amended from time to time; and

WHEREAS, pursuant to the provisions of chapters 36.70 and 36.70A RCW, the Board, on May 25, 2004, under Spokane County Resolution No. 04-0461, adopted a new Zoning Code to implement the goals and policies of the Comprehensive Plan, said regulation becoming effective June 1, 2004, which has been thereafter amended from time to time; and

WHEREAS, in accordance with RCW 36.70A.130, the county must review and update its comprehensive plan and development regulations every ten years, with the next update due by 2026; and

WHEREAS, pursuant to RCW 36.70A, the county and the cities within it must update their comprehensive plans based on a countywide population for the 20-year planning period as projected by the Office of Financial Management; and

WHEREAS, as the regional government, the county is tasked with the adoption of the Countywide Planning Policies, a part of which includes the adoption of the Countywide Population Projection as well as sub-allocations of population to the cities within the county; and

WHEREAS, the Board of County Commissioners of Spokane County passed and adopted resolution number 24-0180 on March 26th, 2024, adopting the preliminary countywide population allocation set at 654,665 by the Washington State Office of Financial Management for the purposes of further study by the county and constituent communities in planning for future growth and population allocations as required by the GMA; and

WHEREAS, the county has not yet undertaken a full SEPA analysis of the impact of the adoption of a certain population number but desires to study the same; and

WHEREAS, the adoption of a number for study purposes is exempt under SEPA (WAC 197-11-800(17)); and

WHEREAS, WAC 365-196-310(4) suggests the consideration of suballocations to jurisdictions for planning purposes, especially with respect to setting or adjusting Urban Growth Areas, and

WHEREAS, the SCEO held a public hearing on the proposed initial first-round population forecast and jurisdictional specific allocations on May 15, 2024, and after consideration and deliberation, unanimously voted to recommend to the Board of County Commissioners the initial first-round population forecast and jurisdictional specific allocations for planning purposes regarding the planning period of 2026-2046 for use by the County and constituent jurisdictions in planning for future growth and jurisdiction specific population allocations as required by the GMA and as set forth in **(Attachment A)**; and

WHEREAS, the Board of County Commissioners received the SCEO recommendation on May 11, 2024, and set June 18, 2024, to consider the same; and

WHERAS, at the June 18, 2024, open public meeting the Board considered the recommendation of the SCEO, and the Department filed and voted on whether to adopt the same for study purposes.

NOW THEREFORE BE IT RESOLVED, the Board herby adopts the initial first-round population forecast and jurisdictional-specific allocations regarding planning period of 2026-2046 for the purposes of further study as set forth in **(Attachments A),** and incorporates the analysis set forth in Attachment A as if fully set forth herein.

PASSED AND ADOPTED this 18th day of June, 2024.

BOARD OF COUNTY COMMISSIONERS
OF SPOKANE COUNTY, WASHINGTON

Mary L. Kuney, Chair

Josh Kerns, Vice-Chair

Al French, Commissioner

Amber Waldref, Commissioner

Chris Jordan, Commissioner

ATTEST:

Ginna Vasquez, Clerk of the Board

Attachment A

Steering Committee of Elected Officials 2026-2046
Initial Jurisdictional Population Allocation
Recommendation

SPOKANE COUNTY STEERING COMMITTEE OF ELECTED OFFICIALS
1026 W Broadway • Spokane WA 99260-0170 • 509.477.1500 • bphelp@spokanecounty.org

May 15, 2024

Mary Kuney, Chair
Spokane County Board of County Commissioners
1026 W. Broadway Ave.
Spokane, WA 99260

RE: Steering Committee of Elected Officials Recommendation for the 2026-2046 Spokane County Initial Jurisdictional Population Allocation

Chair Kuney and Commissioners,

As required by the Spokane County Interlocal Agreement titled Growth Management Act (GMA Joint Planning) Section 3 D, I am forwarding the recommendation of the Steering Committee of Elected Officials (SCEO) regarding the adoption of the Spokane County Initial Jurisdictional Population Allocation for the planning period of 2026-2046 for use by the County and constituent communities in planning for future growth and population allocations under the GMA.

The SCEO held a public hearing on the proposed amendment on May 15, 2024, and considered comments from the Planning Technical Advisory Committee (PTAC). There was no public comment or testimony in favor of or against the proposed amendment.

After deliberation, the Steering Committee unanimously recommended approval of the proposed Spokane County 2026-2046 Initial Jurisdictional Population Allocation for use in each constituent's 2026 comprehensive plans, as described in the attached PTAC report.

Sincerely,

Kevin Freeman, Mayor of Millwood,
Chair, Spokane County Steering Committee of Elected Officials

First-Round Population Forecast and Allocation

PLANNING TECHNICAL ADVISORY COMMITTEE (PTAC)

Report and Recommendation to the Steering Committee of Elected Officials

Periodic Update under the Growth Management Act, 2026 to 2046

Written and Recommended by PTAC, February 2024

Introduction

Following several months of discussion and analysis, the Planning Technical Advisory Committee (PTAC) recommends the following first-round allocation of population in Spokane County through the year 2046. This proposal, if recommended by the SCEO and adopted by the Board of County Commissioners, would constitute an initial allocation of future population that each jurisdiction would use to begin comprehensive planning pursuant to the requirements of the Growth Management Act (GMA).

The full recommendation is summarized on the last page of this report (page 6).

Base Assumptions—Countywide Population Forecast

All the following analysis and recommendations utilize the medium forecast for 2046 provided by the Washington Office of Financial Management (OFM) in 2022. PTAC assumes that this will be the selected countywide growth forecast, but as of the writing of this report the Board of County Commissioners (BOCC) has not adopted that number as the official forecast. If, perchance, BOCC adopts a different forecast for the County, the recommendation provided in this memo will have to be adjusted accordingly.

Multiple Methods Considered

GMA requires that Counties and the jurisdictions undertake a regional effort to apportion the overall countywide population growth to each of the jurisdictions. While considering how best to do this, PTAC formed a subcommittee of volunteers from among its membership. The subcommittee analyzed and considered several methods that could be used to determine how each jurisdiction might grow. These included:

- A trend created from OFM total population estimates.
- A trend created from annual growth rates (OFM-reported).
- Outputs from the Spokane Regional Transportation Council (SRTC) Land Use Allocation Tool.
- A trend crated from American Community Survey/Census reported populations.

After careful consideration of the results, statistical reliability, and relative accuracy of the trends created, PTAC recommends the use of historic OFM population estimates to generate population trends for each jurisdiction.

To generate a trend for each jurisdiction, OFM-reported total population for each jurisdiction from 2010 until 2023 were used to calculate a unique linear trend for each jurisdiction. Those trends were used to forecast total population out to 2046, indicating what proportion, or "share," of the growth should be allocated to each jurisdiction.

Identified Shortfalls and Opportunities in OFM Trend Data

The resulting trend is entirely informed by actual past growth experienced by each jurisdiction rather than conjecture or projections based on less specific data. This approach has the added value of utilizing a data source strongly supported and recommended by the State Department of Commerce and one used by many other counties and cities throughout the state. While past growth is the most stable, statistically supported method for projecting data into the future, it comes with a few shortfalls:

- Recent events like the COVID pandemic and efforts by many jurisdictions in the past few years to foster greater residential development will not be reflected in the trend. Nor will changes to the development environment anticipated by House Bill 1110 and other similar GMA amendments passed in recent years.
- OFM-reported populations are primarily informed by development permits issued by each jurisdiction. Accordingly, consideration of remaining land supply and infrastructure capacity are not factored into the trend, only actual historic development.
- High growth in larger communities in Spokane coupled with slower growth in a few smaller communities resulted in negative projections for three jurisdictions: Fairfield, Latah, and Spangle. The consensus of the PTAC subcommittee is that this is an artifact of the trend calculations—PTAC does not actually expect those communities to shrink between now and 2046. See later in this memo for how this negative result was adjusted by PTAC.

A Two-Step Process for Allocation—Both Past and Present Factors

It is generally agreed that the allocation of population in Spokane County should be informed not only by mathematical trends but also by real-world conditions and the policy framework of each community. To that end, PTAC recommends a two-step process:

FIRST ROUND:	Initial population allocation based on historic population trends.
SECOND ROUND:	Adjusted final population allocation informed by each jurisdictions' Land Capacity Analysis and other sources.

While the exact process for the second-round allocation is still under discussion by the PTAC, factors that are expected to inform the second-round allocation include:

- Past Growth Patterns
- Infrastructure Considerations (Capital Facility Plans, water studies, sewer studies)
- New Requirements of the Growth Management Act (HB 1220, etc.)
- Jurisdictional Feedback
- Proximity to Employment

Accordingly, the initial first-round allocation provided in this report is only a first step in an iterative process. These growth allocations are expected to change through a collaborative cross-jurisdictional discussion once each community has completed their capacity analyses and other studies.

Ensuring a Medium OFM Projection Countywide

When the results of this method were added together, the countywide population in 2046 exceeded the medium OFM population for the entire county. Accordingly, the results of the various linear trends were "normalized" to ensure that the sum of all populations in 2046 matched the medium OFM population trend. Essentially, the trends for all jurisdictions were adjusted very slightly downward to ensure that the sum of all populations conformed to the OFM Medium population.

The only jurisdiction that did not receive this normalization was Medical Lake, where normalization would result in a zero-growth projection. For Medical Lake, the raw trend was used without normalization, resulting in a very small rate of growth (see the following tables).

Negative Trends

For the purposes of the first round, PTAC recommends that the three communities showing negative trends (Fairfield, Latah, and Spangle) be manually adjusted to assume zero change, at least for the first round. PTAC feels that it is unlikely these communities will shrink over time, given the current OFM projections for countywide growth. However, lacking better information as to what growth they might expect, manual adjustment is helpful in that it allows time for these three communities to consider their growth potential from other sources before the final second-round allocation is completed. Once those analyses are complete, these numbers will likely rise during the second-round allocation.

First-Round Population Allocation

The table below **(Table 1)** presents the results of the trend for each jurisdiction, including the corrections and normalization discussed above. The 2023 OFM estimated population for each jurisdiction is shown as well for general information. As discussed above, these numbers are expected to change somewhat in the second round, as more is learned about each jurisdiction's ability/willingness to grow to this degree and their infrastructure/land capacity. However, this result provides a useful first step in regional and local growth planning.

Table 1: TREND RESULTS - FIRST ROUND

	2023 Baseline		2046 Allocation -- RECOMMENDATION			
	TOTAL		TOTAL		GROWTH	
Jurisdiction	**Total Population**	% of Total	**Total Population**	% of Total	**New Population by 2046**	**% of All County Growth**
Spokane County (Whole)	**554,600**	100.00%	**654,665**	100.00%	100,065	**100.00%**
Unincorporated County (inclusive)	**163,390**	29.46%	**198,626**	30.34%	35,236	**35.21%**
Unincorporated Outside UGA Only	**93,934**	16.94%	**98,642**	15.07%	4,708	**4.70%**
Unincorporated Inside UGA Only	**69,456**	12.52%	**99,984**	15.27%	30,528	**30.51%**
Incorporated Spokane County (sum)	**391,210**	70.54%	**456,039**	69.66%	64,829	**64.79%**
Airway Heights	**11,280**	2.03%	**17,945**	2.74%	6,665	**6.66%**
Cheney	**13,160**	2.37%	**16,535**	2.53%	3,375	**3.37%**
Deer Park	**4,925**	0.89%	**6,290**	0.96%	1,365	**1.36%**
Fairfield	**600**	0.11%	**600**	0.09%	0	**0.00%**
Latah	**185**	0.03%	**185**	0.03%	0	**0.00%**
Liberty Lake	**13,150**	2.37%	**21,934**	3.35%	8,784	**8.78%**
Medical Lake	**4,915**	0.89%	**5,159**	0.79%	244	**0.24%**
Millwood	**1,925**	0.35%	**1,974**	0.30%	49	**0.05%**
Rockford	**570**	0.10%	**636**	0.10%	66	**0.07%**
Spangle	**280**	0.05%	**280**	0.04%	0	**0.00%**
Spokane	**232,700**	41.96%	**256,057**	39.11%	23,357	**23.34%**
Spokane Valley	**107,400**	19.37%	**128,313**	19.60%	20,913	**20.90%**
Waverly	**120**	0.02%	**131**	0.02%	11	**0.01%**
Source	*OFM*	*CALC*	*CALC*	*TREND*	*CALC*	*CALC*
Notes:	*UGA = Urban Growth Area, OFM = Office of Financial Management population estimate, CALC = Calculated Value, "inclusive" = includes both inside and outside the UGA*					

Comparison of Previous and New Allocations

The last time the County and Cities were asked to adopt a population allocation was during the 2017 Comprehensive Plan Update process. Since that time, growth in the County has generally outstripped the projections provided by OFM. Accordingly, the new countywide OFM projection provided by OFM assumes somewhat higher overall growth in Spokane County than before, in line with the actual growth seen between 2017 and 2023. In other words, OFM has corrected for the error in the previous forecast.

Because the growth expected in the future is significantly greater than last round, it is more useful to compare the share of overall growth allocated to each jurisdiction rather than the numerical growth in people. As shown in **Table 2** below, the overall share of growth that each jurisdiction is expected to accommodate has not changed significantly since the 2017 updates, save for the unincorporated UGA and the unincorporated rural areas outside the UGA.

Table 2: COMPARING 2017 AND 2026 SHARE OF GROWTH

	2017 UPDATE CYCLE			2026 UPDATE CYCLE			COMPARISON	
	CURRENT	FUTURE		CURRENT	FUTURE			
Jurisdiction	**2017 Population**	**Growth through 2037**	**Share of County Growth**	**2023 Population**	**Growth through 2046**	**Share of County Growth**	**Share is Higher or Lower?**	**Change in Share %**
Spokane County (Whole)	499,348	84,061	100.00%	**554,600**	100,065	100.00%	-	-
Unincorporated County (inclusive)	144,903	31,877	37.92%	**163,390**	35,236	35.21%	Lower	-2.71%
Unincorporated Outside UGA Only	91,010	17,653	21.00%	**93,934**	4,708	4.70%	Lower	-16.30%
Unincorporated Inside UGA Only	53,893	14,224	16.92%	**69,456**	30,528	30.51%	Higher	13.59%
Incorporated Spokane County (sum)	354,445	52,184	62.08%	**391,210**	64,829	64.79%	Higher	2.71%
Airway Heights	9,071	5,226	6.22%	**11,280**	6,665	6.66%	Higher	0.44%
Cheney	11,827	2,949	3.51%	**13,160**	3,375	3.37%	Lower	-0.14%
Deer Park	4,110	1,215	1.45%	**4,925**	1,365	1.36%	Lower	-0.08%
Fairfield	620	40	0.05%	**600**	0	0.00%	Same	-0.05%
Latah	195	0	0.00%	**185**	0	0.00%	Same	0.00%
Liberty Lake	9,780	6,129	7.29%	**13,150**	8,784	8.78%	Higher	1.49%
Medical Lake	5,072	970	1.15%	**4,915**	244	0.24%	Lower	-0.91%
Millwood	1,808	139	0.17%	**1,925**	49	0.05%	Lower	-0.12%
Rockford	470	0	0.00%	**570**	66	0.07%	Higher	0.07%
Spangle	281	7	0.01%	**280**	0	0.00%	Lower	-0.01%
Spokane	215,839	20,859	24.81%	**232,700**	23,357	23.34%	Lower	-1.47%
Spokane Valley	95,264	14,650	17.43%	**107,400**	20,913	20.90%	Higher	3.47%
Waverly	108	0	0.00%	**120**	11	0.01%	Higher	0.01%
Source	*SCEO*	*SCEO*	*CALC*	*OFM*	*PTAC*	*CALC*	*CALC*	*CALC*

Notes: UGA = Urban Growth Area, CALC = Calculated Value, PTAC = Round One Population Allocation Recommendation (see Table 1 above), "inclusive" = includes both inside and outside the UGA, SCEO = Steering Committee of Elected Officials Report, Population Forecast and Allocation, November 2015.

As **Table 2** shows, most jurisdictions can expect very similar shares of future growth compared the previous comprehensive plan update process. Most shares would change less than two percent, except for Spokane Valley which indicates slightly more than a four percent increase in share.

Of note, the share of growth expected in the Unincorporated UGA and Unincorporated Outside the UGA areas differs more than 13 percent when comparing the 2017 and 2024 cycles. The assumption during the 2017 update cycle was that more growth would occur in the rural areas outside the UGA than in the unincorporated UGA. However, growth reported by OFM since 2020 has been significantly higher in the unincorporated UGA areas than in the rural areas. By using historic population to create trends for these areas, the recommended allocation for this round corrects that inconsistency and allocates much more growth to the unincorporated UGA than to the rural areas. The trend utilized by PTAC to form this first-round recommendation made this adjustment naturally without the need for any manual adjustment of the projection—development since 2017 was truly higher inside the UGA than outside it, creating a higher projected growth trend.

Conclusion & Recommendation

In consideration of the data and analysis described above, the PTAC recommends to the SCEO the following:

1. Approve a First Round Population Allocation for Spokane County and its jurisdictions based on the following share of future growth through 2046:

Table 3: PTAC Recommendation, 2046 Forecast and Allocation

Jurisdiction	% of Future Growth	Additional Population in 2046	Total Population in 2046
Spokane County (Whole)[1]	100.00%	100,065	654,665
Unincorporated County (inclusive)	35.21%	35,236	198,626
Unincorporated Outside UGA Only	4.70%	4,708	98,642
Unincorporated Inside UGA Only	30.51%	30,528	99,984
Incorporated Spokane County (sum)	64.79%	64,829	456,039
Airway Heights	6.66%	6,665	17,945
Cheney	3.37%	3,375	16,535
Deer Park	1.36%	1,365	6,290
Fairfield[2]	0.00%	0	600
Latah[2]	0.00%	0	185
Liberty Lake	8.78%	8,784	21,934
Medical Lake	0.24%	244	5,159
Millwood	0.05%	49	1,974
Rockford	0.07%	66	636
Spangle[2]	0.00%	0	280
Spokane	23.34%	23,357	256,057
Spokane Valley	20.90%	20,913	128,313
Waverly	0.01%	11	131
Notes:	*[1]The Spokane County number represents the medium OFM projection for Spokane County, expected to be adopted by the BOCC in a meeting in the first quarter of 2024. It is not a part of this recommendation.* *[2]It is not expected that the growth for these three jurisdictions will remain at zero through the final allocation.*		

2. Ask each Jurisdiction to provide input to the PTAC on their capacity and ability to serve this amount of growth as well as any known or reasonably expected development that might change the population they can expect to accommodate within 20 years, after which PTAC will provide any recommended changes to the table above to achieve a final recommended allocation.

2026-2046 Initial Jurisdictional Population Allocation SCEO Recommendation

Final Audit Report 2024-05-15

Created:	2024-05-15
By:	Elya Miroshin (EMIROSHIN@spokanecounty.org)
Status:	Signed
Transaction ID:	CBJCHBCAABAAa9cMCPOIl6mAD0B9slJ5aNqXeaJB5NkA

"2026-2046 Initial Jurisdictional Population Allocation SCEO Recommendation" History

- Document created by Elya Miroshin (EMIROSHIN@spokanecounty.org)
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- Email viewed by mayor@millwoodwa.us
  2024-05-15 - 8:48:20 PM GMT
- Signer mayor@millwoodwa.us entered name at signing as Kevin M. Freeman
  2024-05-15 - 8:52:08 PM GMT
- Document e-signed by Kevin M. Freeman (mayor@millwoodwa.us)
  Signature Date: 2024-05-15 - 8:52:10 PM GMT - Time Source: server
- Agreement completed.
  2024-05-15 - 8:52:10 PM GMT

5a

Submit to Clerk of the Board with available supporting materials (Resolutions, Agreements, Presentations, etc.)

AGENDA SHEET

SUBMITTING DEPARTMENT: Building & Planning

CONTACT PERSON: Scott Chesney, Jessica Pilgrim, Laurie Carver

PHONE NUMBER: 477-7212, 509-477-3641, 509-477-7127

CHECK TYPE OF MEETING BELOW:	***BELOW FOR CLERK'S USE ONLY:***	
☒ Regular Legislative Session Agenda	Clerk's Resolution No.	24-0348
	Approved:	Majority/Unanimous
	Denied:	Majority/Unanimous
	Renews/Amends No.	
	Public Works No.	
	Purchasing Dept. No.	

***AGENDA TITLE** (please provide a reasonably descriptive agenda title for this item:* Consider Initial 2046 Population Allocation Recommendation from the Steering Committee of Elected Officials to Spokane County, Cities, and Towns to Plan for Growth

***DESCRIPTIVE SUMMARY** (please provide anticipated fiscal and budgetary information & reason for request):* One early step in planning for growth is an assessment of likely population growth for Spokane County. The Growth Management Act uses population projections from the Washington State Office of Financial Management, issued in 2022, as the baseline. Spokane County earlier adopted the "medium" growth projection for this planning horizon, which suggests approximately 100,000 new persons by 2046.
This step is an initial allocation of that county-wide growth to the individual jurisdictions and the unincorporated county. These allocations, along with the Land Capacity Analysis, are used to analyze the adequacy of the urban growth area.

***FISCAL IMPACT** (please provide anticipated fiscal and budgetary impact, with amount and source of funds, if applicable):* N/A

***REQUESTED BOARD ACTION** (if any):* Adoption of resolution accepting the SCEO recommendation

Other County Departments Impacted - List any other departments that were notified in advance of this agenda item: Legal

This Item will need to be codified in the Spokane County Code: No

NO. 25-0033

BEFORE THE BOARD OF COUNTY COMMISSIONERS
OF SPOKANE COUNTY, WASHINGTON

IN THE MATTER OF CONSIDERING THE SPOKANE COUNTY STEERING COMMITTEE OF ELECTED OFFICIALS (SCEO) RECOMMENDATION RELATED TO THE HOUSING FOR ALL PLANNING TOOL (HAPT) METHODOLOGY FOR HOUSING ALLOCATIONS	**RESOLUTION**

WHEREAS, pursuant to the provisions of RCW 36.32.120(6), the Board of County Commissioners of Spokane County, Washington, hereinafter referred to as the "Board," has the care of county property and the management of county funds and business; and

WHEREAS, pursuant to the provisions of Chapter 36.70.040 RCW, the Board has created a Planning Department, hereinafter referred to as the "Department," and a Planning Commission, hereinafter referred to as the "Commission" (Resolution No. 76-698 as amended by Resolution 23-0057); and

WHEREAS, pursuant to RCW 36. 70A.210, the Steering Committee of Elected Officials ("Steering Committee") was established by interlocal agreement (Resolution 1994-1686, and as amended thereafter from time to time) to assist in the development of the Countywide Planning Policies and perform other duties, including but not limited to providing recommendations to the Board of County Commissioners on the same; and

WHEREAS, the Planning Technical Advisory Committee (PTAC), consisting of technical staff from the various jurisdictions, is tasked with providing a report and recommendation to the Steering Committee on proposed amendments to the Countywide Planning Policies; and

WHEREAS, pursuant to the provisions of chapters 36.70 and 36.70A RCW, the Board adopted a Comprehensive Plan for Spokane County on November 5, 2001 (Board Resolutions 1-1059 and 1-1060), which has been thereafter amended from time to time; and

WHEREAS, pursuant to the provisions of chapters 36.70 and 36.70A RCW, the Board, on May 25, 2004, under Spokane County Resolution No. 04-0461, adopted a new Zoning Code to implement the goals and policies of the Comprehensive Plan, said regulation becoming effective June 1, 2004, which has been thereafter amended from time to time; and

WHEREAS, in accordance with RCW 36.70A.130, the county must review and update its comprehensive plan and development regulations every ten years, with the next update due by 2026; and

WHEREAS, SCEO held a public hearing on the proposed "A Prime" HAPT methodology on 9/25/24 and considered comments from the Planning Technical Advisory Committee (PTAC). No public comment or testimony in favor of or against the proposed methodology was received; and

WHEREAS, after deliberation, the Steering Committee unanimously recommended approval of the proposed Spokane County "A Prime" HAPT methodology for use in each constituent's 2026 comprehensive plans; and

WHEREAS, pursuant to RCW 36.70 A, the county and the cities within it must update their comprehensive

plans based on a countywide population for the 20-year planning period as projected by the Office of Financial Management; and

WHEREAS, as the regional government, the county is tasked with the adoption of the Countywide Planning Policies, a part of which includes the adoption of the Countywide Population Projection as well as sub-allocations of population to the cities within the county; and

WHEREAS, the Spokane County planning commission held workshops examining HAPT on 6/13/24 and 7/11/24; and

WHEREAS, SCEO held workshops examining HAPT on 5/15/24, 7/17/12 and 8/20/24; and

WHEREAS, the Board of County Commissioners received the SCEO recommendation on January 14th, 2025, and set January 21st, 2025, to consider the same; and

WHEREAS, at the January 21st, 2025, open public meeting the Board considered the recommendation of the SCEO, and the Department filed and voted on whether to adopt the same.

NOW THEREFORE BE IT RESOLVED, the Board herby adopts the "A Prime" HAPT methodology for the purpose of allocating housing units for the planning period of 2026- 2046.

PASSED AND ADOPTED this 21st day of January 2025.

BOARD OF COUNTY COMMISSIONERS
OF SPOKANE COUNTY, WASHINGTON

BOARD OF COMMISSIONERS SPOKANE COUNTY SEAL SPOKANE COUNTY, WA

ATTEST:

Ginna Vasquez

Ginna Vasquez, Clerk of the Board

Mary L Kuney

Mary L. Kuney, Chair

Josh Kerns, Vice-Chair

Al French

Al French, Commissioner

Amber Waldref

Amber Waldref, Commissioner

Chris Jordan

Chris Jordan, Commissioner

MEMORANDUM

To:	Steering Committee of Elected Officials (SCEO)
From:	Planning Technical Advisory Committee (PTAC)
Via:	Spokane County Building and Planning
Date:	September 16, 2024
Re:	PTAC Recommendation, Housing for All Planning Tool methodology

Background Summary

Earlier this year, SCEO tasked PTAC with analyzing possible HAPT methodologies.

During this exploration, PTAC analyzed:

- Methods A and B
- Commerce's update of method A (A Prime), wherein the county's share is split between the unincorporated UGAs and rural areas.
- Custom methods created by other counties (Lewis, King, Skagit, and Snohomish)
    - Lewis, Skagit, and Snohomish's custom methodologies were found to be not applicable to Spokane County.
    - King County's custom methodology served as the basis for a Spokane County proposal that was brought before PTAC and SCEO.
- Two possible custom methods, including
    - Weighted transit
        - This methodology would have allocated low-income housing partially based on transit availability.
            - Was not carried forward, owing to a lack of support from PTAC.
    - Jobs to housing ratio
        - This methodology, based on King County's custom method, adjusts 0-50% allocations based on the ratio of low-income jobs (under $40,000) to low-income residents.
            - Was not carried forward, owing to a lack of support from PTAC.

Options Going Forward

SCEO has two options:

1. Adopt one of the base Commerce methodologies (A, A prime, or B).
    a. Adoption of A prime is recommended by PTAC.
2. Continue pursuing a custom methodology (method C).
    a. Any potential custom method will require clear guidance from SCEO on what changes are desired. There is no readily available data to accommodate such an exploration, so it would likely require a significant commitment of staff time.

Recommendation

PTAC recommends using HAPT Method A Prime. Method A Prime uses the same assumptions and calculations as Method A but allows for a distinction between rural County lands, unincorporated UGAs, and the incorporated jurisdictions. Additional details on this recommendation, along with the housing allocation numbers based on the current population allocation, can be found below.

Methodology Pros/Cons

Method	Pros	Cons
A	Equally distributes housing levels among jurisdictions, based on growth projections; Simplicity and clarity	Allocates low-income and emergency housing to rural areas
A Prime	Reserves lower-income housing for urban areas; Avoids placing emergency housing in rural areas	None identified by PTAC
B	Accounts for existing housing by allocating fewer units per income band to jurisdictions that have a larger share of housing in said income band than other jurisdictions	Allocates low-income and emergency housing to rural areas; creates negative housing allocations, the implications of which are not well understood.
C: Low-income jobs to low-income residents' ratio	Accounts for an additional piece of local analysis that factors in housing and employment locations, Identifying locations where lower wage jobs exist but not enough lower cost housing	What weight to give the analysis is unknown; Lack of support from jurisdictions; Concerns about the amount of time needed to perfect this methodology

Housing Allocation Numbers (Corrected)

	Method A Prime								
	Housing Allocation Income Bands								
	Total	0-30% AMI Non-PSH	0-30% AMI PSH	30-50%	50-80%	80-100%	100-120%	>120%	Temporary Emergency Housing
Total Countywide Allocation	**75,184**	**19,905**	**5,714**	**13,620**	**8,844**	**4,772**	**3,937**	**18,392**	**3,037**
Unincorporated UGA	22,946	6,375	1,830	4,362	2,699	1,456	1,202	5,022	973
Rural Outside UGA	3,534	0	0	0	416	225	185	2,708	0
Airway Heights	5,007	1,391	399	952	589	318	262	1,096	212
Cheney	2,535	704	202	482	298	161	133	555	107
Deer Park	1,023	284	82	194	120	65	54	224	43
Fairfield	0	0	0	0	0	0	0	0	0
Latah	0	0	0	0	0	0	0	0	0
Liberty Lake	6,601	1,834	526	1,255	776	419	346	1,445	280
Medical Lake	179	50	14	34	21	11	9	40	8
Millwood	36	10	3	7	4	2	2	8	2
Rockford	53	15	4	10	6	3	3	12	2
Spangle	0	0	0	0	0	0	0	0	0
Spokane (City)	17,550	4,875	1,400	3,336	2,066	1,115	918	3,840	744
Spokane Valley	15,713	4,365	1,253	2,987	1,848	997	823	3,440	666
Waverly	7	2	1	1	1	0	0	2	0

Note: Jurisdictions are NOT required to ensure that these units are built. They must simply have zoning, regulations and development codes that allow these units to be built.

Housing Allocation Numbers (Original)

	Method A Prime								
	Housing Allocation Income Bands								
	Total	0-30% AMI Non-PSH	0-30% AMI PSH	30-50%	50-80%	80-100%	100-120%	>120%	Temporary Emergency Housing
Total Countywide Allocation	75,184	19,905	5,714	13,620	8,844	4,772	3,937	18,464	3,037
Unincorporated UGA	22,946	6,375	1,830	4,362	2,699	1,456	1,202	5,022	973
Rural Outside UGA	3,534	0	0	0	416	225	185	2,780	0
Airway Heights	5,007	1,391	399	952	589	318	262	1,096	212
Cheney	2,535	704	202	482	298	161	133	555	107
Deer Park	1,023	284	82	194	120	65	54	224	43
Fairfield	0	0	0	0	0	0	0	0	0
Latah	0	0	0	0	0	0	0	0	0
Liberty Lake	6,601	1,834	526	1,255	776	419	346	1,445	280
Medical Lake	179	50	14	34	21	11	9	40	8
Millwood	36	10	3	7	4	2	2	8	2
Rockford	53	15	4	10	6	3	3	12	2
Spangle	0	0	0	0	0	0	0	0	0
Spokane (City)	17,550	4,875	1,400	3,336	2,066	1,115	918	3,840	744
Spokane Valley	15,713	4,365	1,253	2,987	1,848	997	823	3,440	666
Waverly	7	2	1	1	1	0	0	2	0

Note: These numbers, which were included in the original staff report, contain small errors that incorrectly represent the current HAPT allocation. These errors have been corrected in the table on the top of this page.

SPOKANE COUNTY STEERING COMMITTEE OF ELECTED OFFICIALS
1026 W Broadway • Spokane WA 99260-0170 • 509.477.1500 • bphelp@spokanecounty.org

December 17, 2024

Mary Kuney, Chair
Spokane County Board of County Commissioners
1026 W. Broadway Ave.
Spokane, WA 99260

RE: Steering Committee of Elected Officials Recommendation for the 2026-2046 Spokane County Housing for All Planning Tool (HAPT) methodology

Chair Kuney and Commissioners,

As required by the Spokane County Interlocal Agreement titled Growth Management Act (GMA Joint Planning) Section 3 D, I am forwarding the recommendation of the Steering Committee of Elected Officials (SCEO) regarding the adoption of the Spokane County Housing for All Planning Tool (HAPT) methodology for the planning period of 2026-2046 for use by the County and constituent communities in planning for future growth and housing allocations under the GMA.

The SCEO held a public hearing on the proposed amendment on September 25, 2024, and considered comments from the Planning Technical Advisory Committee (PTAC). There was no public comment or testimony in favor of or against the proposed amendment.

After deliberation, the Steering Committee unanimously recommended approval of the proposed Spokane County 2026-2046 HAPT methodology.

Sincerely,

Al French, Commissioner of Spokane County,
Chair, Spokane County Steering Committee of Elected Officials

Submit to Clerk of the Board with available supporting materials (Resolutions, Agreements, Presentations, etc.)

AGENDA SHEET

SUBMITTING DEPARTMENT: Building & Planning

CONTACT PERSON: Scott Chesney, Laurie Carver

PHONE NUMBER: 477-7212, 509-477-7127

CHECK TYPE OF MEETING BELOW:

☒ Regular Legislative Session Agenda

BELOW FOR CLERK'S USE ONLY:

Clerk's Resolution No.	25-0033
Approved:	Majority/Unanimous
Denied:	Majority/Unanimous
Renews/Amends No.	
Public Works No.	
Purchasing Dept. No.	

***AGENDA TITLE** (please provide a reasonably descriptive agenda title for this item:* Consider the SCEO Recommendation for the Housing for all Planning Tool Methodology (HAPT)

***DESCRIPTIVE SUMMARY** (please provide anticipated fiscal and budgetary information & reason for request):* On September 25, 2024, the Steering Committee of Elected Officials voted to adopt HAPT method A-Prime based on the Planning Technical Advisory Committee recommendation. Method A-Prime allocates housing units based primarily on the share of growth each jurisdiction is projected to receive.

***FISCAL IMPACT** (please provide anticipated fiscal and budgetary impact, with amount and source of funds, if applicable):* NA

***REQUESTED BOARD ACTION** (if any):*

Other County Departments Impacted - List any other departments that were notified in advance of this agenda item: Legal

This Item will need to be codified in the Spokane County Code: No

NO. 26 - 0375

BEFORE THE BOARD OF COUNTY COMMISSIONERS
OF SPOKANE COUNTY, WASHINGTON

IN THE MATTER OF CONSIDERING THE SPOKANE COUNTY STEERING COMMITTEE OF ELECTED OFFICIALS' (SCEO) RECOMMENDATION RELATED TO THE HOUSING FOR ALL PLANNING TOOL (HAPT) HOUSING UNIT GROWTH SHARE INPUT FOR HOUSING ALLOCATIONS.	**RESOLUTION**

WHEREAS, pursuant to the Constitution and laws of the State of Washington, Spokane County, Washington is a class A county duly organized and existing ("Spokane County" or "County"); and

WHEREAS, pursuant to the provisions of RCW 36.01.030, the powers of Spokane County can only be exercised through the Board of County Commissioners of Spokane County, Washington ("Board" or "Board of County Commissioners"); and

WHEREAS, pursuant to the provisions of RCW 36.32.120(6), the Board of County Commissioners has the care of county property and the management of county funds and business; and

WHEREAS, pursuant to the provisions of Chapter 36.70.040 RCW, the Board has created a Planning Department, hereinafter referred to as the "Department," and a Planning Commission, hereinafter referred to as the "Commission" (Resolution No. 76-698 as amended by Resolution 23-0057); and

WHEREAS, pursuant to RCW 36.70A.210, the Steering Committee of Elected Officials ("Steering Committee") was established by interlocal agreement (Resolution 1994-1686, as amended on October 9, 2003, on November 19, 2008, and on November 13, 2024, the November 13, 2024 amendment having been adopted by the Board through Resolution 25-0166 on April 8, 2025) to assist in the development of the Countywide Planning Policies and perform other duties, including but not limited to providing recommendations to the Board of County Commissioners on the same; and

WHEREAS, the Planning Technical Advisory Committee (PTAC), consisting of technical staff from the various jurisdictions, is tasked with providing a report and recommendation to the Steering Committee on proposed amendments to the Countywide Planning Policies; and

WHEREAS, pursuant to the provisions of chapters 36.70 and 36.70A RCW, the Board adopted a Comprehensive Plan for Spokane County on November 5, 2001 (Board Resolutions 1-1059 and 1-1060), which has been thereafter amended from time to time; and

WHEREAS, pursuant to the provisions of chapters 36.70 and 36.70A RCW, the Board, on May 25, 2004, under Spokane County Resolution No. 04-0461, adopted a new Zoning Code to implement the goals and policies of the Comprehensive Plan, said regulation becoming effective June 1, 2004, which has been thereafter amended from time to time; and

WHEREAS, in accordance with RCW 36.70A.130(5), the county must review and, if necessary, revise its comprehensive plan and development regulations on or before December 31, 2026, with the following review and revision on or before June 30, 2036 and every ten years thereafter; and

WHEREAS, pursuant to RCW 36.70A.110, .115, and .130, the county and the cities within it must update their comprehensive plans based on a countywide population for the 20-year planning period as projected by the Office of Financial Management; and

WHEREAS, as the regional government, the county is tasked with the adoption of the Countywide Planning Policies, a part of which includes the adoption of the Countywide Population Projection as well as sub-allocations of population to the cities within the county; and

WHEREAS, SCEO held workshops examining the Housing for All Planning Tool (HAPT) on May 15, 2024, July 17, 2024 and August 20, 2024; and

WHEREAS, the Spokane County planning commission held workshops examining HAPT on June 13, 2024 and July 11, 2024; and

WHEREAS, SCEO held a public hearing on the proposed "A Prime" HAPT methodology on September 25, 2024 and considered comments from the Planning Technical Advisory Committee (PTAC). No public comment or testimony in favor of or against the proposed methodology was received; and

WHEREAS, after deliberation, the Steering Committee unanimously recommended approval of the proposed Spokane County "A Prime" HAPT methodology for use in each constituent's 2026 comprehensive plans; and

WHEREAS, the Board of County Commissioners received the SCEO recommendation on January 14th, 2025, and set January 21st, 2025, to consider the same; and

WHEREAS, at the January 21st, 2025, open public meeting the Board considered the recommendation of the SCEO, and the Department filed and voted on whether to adopt the same; and

WHEREAS, at the January 21, 2025, open public meeting, by Resolution 25-0033, the Board adopted the "A Prime" HAPT methodology for the purpose of allocating housing units for the planning period of 2026-2046; and

WHEREAS, SCEO held a workshop examining the inputs into the HAPT on January 29, 2025, the PTAC recommending the region use "housing growth share"; and

WHEREAS, the SCEO held a legally noticed public hearing on the proposed "housing growth share" input into the HAPT on June 17, 2026, and considered comments from the Planning Technical Advisory Committee (PTAC), members of the public who spoke in support of the proposed input, and members of the public who spoke in favor of the prior population-share input; and

WHEREAS, after deliberation, the Steering Committee, by a vote of 13 in favor and 2 opposed, recommended approval of the housing-unit allocation derived from HAPT Method A Prime using housing-growth-share inputs, including the rural and urban modifications proposed by Spokane County to better allocate rural and urban housing units, for use by each constituent jurisdiction in its 2026 comprehensive plan; and

WHEREAS, the Board of County Commissioners received the SCEO recommendation on July 14, 2026, and set July 21, 2026 to consider the same; and

WHEREAS, at the July 21, 2026, open public meeting the Board considered the recommendation of the SCEO, and voted on whether to adopt the same; and

WHEREAS, the Board has adopted Public Participation Program Guidelines through Resolution 22-0470 on July 19, 2022, which the Steering Committee uses pursuant to Section 3.E of the Joint Planning Interlocal Agreement; and

WHEREAS, notice of the June 17, 2026, SCEO public hearing was issued on May 26, 2026, and posted on the Spokane County Building and Planning webpage, consistent with the Public Participation Program Guidelines and RCW 36.70A.035; and

WHEREAS, the rural and urban modifications proposed by Spokane County were included in the materials available for the noticed public hearing on June 17, 2026, and members of the public had the opportunity to comment on the modifications at that hearing; and

WHEREAS, the vote of 13 in favor and 2 opposed exceeded both the simple-majority action threshold of Section 2 and the two-thirds threshold of Section 4.2 of the Joint Planning Interlocal Agreement; and

WHEREAS, the Department of Planning has determined that this action is being processed within the integrated environmental impact statement review for the 2026 to 2046 comprehensive plan update, a copy of which is on file with the Department.

NOW, THEREFORE, BE IT RESOLVED, the Board hereby finds:

1. The Steering Committee of Elected Officials held a legally noticed public hearing on June 17, 2026, in accordance with the Public Participation Program Guidelines adopted by Resolution 22-0470 and consistent with RCW 36.70A.035 and RCW 36.70A.140.
2. PTAC's January 2025 memorandum and the County's proposed rural and urban modifications were before the Steering Committee at the publicly noticed hearing, and members of the public commented on the proposed input and on the modifications.
3. The Steering Committee voted 13 in favor and 2 opposed to recommend Board adoption of the housing-unit allocation derived from HAPT Method A Prime using housing-growth-share inputs, with the County modifications, a margin exceeding both the simple-majority action threshold of Section 2 and the two-thirds threshold of Section 4.2 of the Joint Planning Interlocal Agreement.
4. The Board has reviewed the recommendation, the supporting record, and public comments received at the Board's open public meeting and finds the recommendation consistent with RCW 36.70A.210, the 2024 amended Joint Planning Interlocal Agreement, the Countywide Planning Policies, and the County's Public Participation Program Guidelines.
5. Adoption of the recommended allocation provides a unified regional baseline for housing planning by the County and the constituent cities and towns, and supports the County's compliance with RCW 36.70A.070(2) as amended by HB 1220.

BE IT FURTHER RESOLVED, the Board hereby adopts and certifies the recommendation of the Steering Committee of Elected Officials and approves the housing-unit allocation by jurisdiction and income band set forth in Attachment A, derived from the HAPT Method A Prime methodology adopted by Resolution 25-0033 using housing-unit-share inputs, including the rural and urban modifications proposed by Spokane County Planning staff and incorporated by the Steering Committee in its recommendation, for use by the County and the constituent jurisdictions in planning for housing under the Growth Management Act during the planning period of 2026 to 2046.

BE IT FURTHER RESOLVED, that all rural housing units for up to 120 percent of area median income, resulting from the housing growth share input into the HAPT, be reallocated to the unincorporated urban growth areas for each respective income band.

PASSED AND ADOPTED this 21st day of July 2026 in the City of Spokane, Washington.

BOARD OF COUNTY COMMISSIONERS
OF SPOKANE COUNTY, WASHINGTON

Mary Brooks, Chair

(Nay)
Al French, Vice-Chair

(Nay)
Josh Kerns, Commissioner

Amber Waldref, Commissioner

Chris Jordan, Commissioner

ATTEST:

Ginna Vasquez, Clerk of the Board

ATTACHMENT A

Resolution 25-0033

IN THE MATTER OF CONSIDERING THE SPOKANE COUNTY STEERING COMMITTEE OF ELECTED OFFICIALS (SCEO) RECOMMENDATION RELATED TO THE HOUSING FOR ALL PLANNING TOOL (HAPT) METHODOLOGY FOR HOUSING ALLOCATIONS

Adopted January 21, 2025

NO. 25-0033

BEFORE THE BOARD OF COUNTY COMMISSIONERS
OF SPOKANE COUNTY, WASHINGTON

IN THE MATTER OF CONSIDERING THE SPOKANE COUNTY STEERING COMMITTEE OF ELECTED OFFICIALS (SCEO) RECOMMENDATION RELATED TO THE HOUSING FOR ALL PLANNING TOOL (HAPT) METHODOLOGY FOR HOUSING ALLOCATIONS	**RESOLUTION**

WHEREAS, pursuant to the provisions of RCW 36.32.120(6), the Board of County Commissioners of Spokane County, Washington, hereinafter referred to as the "Board," has the care of county property and the management of county funds and business; and

WHEREAS, pursuant to the provisions of Chapter 36.70.040 RCW, the Board has created a Planning Department, hereinafter referred to as the "Department," and a Planning Commission, hereinafter referred to as the "Commission" (Resolution No. 76-698 as amended by Resolution 23-0057); and

WHEREAS, pursuant to RCW 36. 70A.210, the Steering Committee of Elected Officials ("Steering Committee") was established by interlocal agreement (Resolution 1994-1686, and as amended thereafter from time to time) to assist in the development of the Countywide Planning Policies and perform other duties, including but not limited to providing recommendations to the Board of County Commissioners on the same; and

WHEREAS, the Planning Technical Advisory Committee (PTAC), consisting of technical staff from the various jurisdictions, is tasked with providing a report and recommendation to the Steering Committee on proposed amendments to the Countywide Planning Policies; and

WHEREAS, pursuant to the provisions of chapters 36.70 and 36.70A RCW, the Board adopted a Comprehensive Plan for Spokane County on November 5, 2001 (Board Resolutions 1-1059 and 1-1060), which has been thereafter amended from time to time; and

WHEREAS, pursuant to the provisions of chapters 36.70 and 36.70A RCW, the Board, on May 25, 2004, under Spokane County Resolution No. 04-0461, adopted a new Zoning Code to implement the goals and policies of the Comprehensive Plan, said regulation becoming effective June 1, 2004, which has been thereafter amended from time to time; and

WHEREAS, in accordance with RCW 36.70A.130, the county must review and update its comprehensive plan and development regulations every ten years, with the next update due by 2026; and

WHEREAS, SCEO held a public hearing on the proposed "A Prime" HAPT methodology on 9/25/24 and considered comments from the Planning Technical Advisory Committee (PTAC). No public comment or testimony in favor of or against the proposed methodology was received; and

WHEREAS, after deliberation, the Steering Committee unanimously recommended approval of the proposed Spokane County "A Prime" HAPT methodology for use in each constituent's 2026 comprehensive plans; and

WHEREAS, pursuant to RCW 36.70 A, the county and the cities within it must update their comprehensive

plans based on a countywide population for the 20-year planning period as projected by the Office of Financial Management; and

WHEREAS, as the regional government, the county is tasked with the adoption of the Countywide Planning Policies, a part of which includes the adoption of the Countywide Population Projection as well as sub-allocations of population to the cities within the county; and

WHEREAS, the Spokane County planning commission held workshops examining HAPT on 6/13/24 and 7/11/24; and

WHEREAS, SCEO held workshops examining HAPT on 5/15/24, 7/17/12 and 8/20/24; and

WHEREAS, the Board of County Commissioners received the SCEO recommendation on January 14th, 2025, and set January 21st, 2025, to consider the same; and

WHEREAS, at the January 21st, 2025, open public meeting the Board considered the recommendation of the SCEO, and the Department filed and voted on whether to adopt the same.

NOW THEREFORE BE IT RESOLVED, the Board herby adopts the "A Prime" HAPT methodology for the purpose of allocating housing units for the planning period of 2026- 2046.

PASSED AND ADOPTED this 21st day of January 2025.

BOARD OF COUNTY COMMISSIONERS OF SPOKANE COUNTY, WASHINGTON

BOARD OF COMMISSIONERS SPOKANE COUNTY SEAL SPOKANE COUNTY, WA

ATTEST:

Ginna Vasquez

Ginna Vasquez, Clerk of the Board

Mary L Kuney

Mary L. Kuney, Chair

Josh Kerns

Josh Kerns, Vice-Chair

Al French

Al French, Commissioner

Amber Waldref

Amber Waldref, Commissioner

Chris Jordan

Chris Jordan, Commissioner

MEMORANDUM

To:	Steering Committee of Elected Officials (SCEO)
From:	Planning Technical Advisory Committee (PTAC)
Via:	Spokane County Building and Planning
Date:	September 16, 2024
Re:	PTAC Recommendation, Housing for All Planning Tool methodology

Background Summary

Earlier this year, SCEO tasked PTAC with analyzing possible HAPT methodologies.

During this exploration, PTAC analyzed:

- Methods A and B
- Commerce's update of method A (A Prime), wherein the county's share is split between the unincorporated UGAs and rural areas.
- Custom methods created by other counties (Lewis, King, Skagit, and Snohomish)
    - Lewis, Skagit, and Snohomish's custom methodologies were found to be not applicable to Spokane County.
    - King County's custom methodology served as the basis for a Spokane County proposal that was brought before PTAC and SCEO.
- Two possible custom methods, including
    - Weighted transit
        - This methodology would have allocated low-income housing partially based on transit availability.
            - Was not carried forward, owing to a lack of support from PTAC.
    - Jobs to housing ratio
        - This methodology, based on King County's custom method, adjusts 0-50% allocations based on the ratio of low-income jobs (under $40,000) to low-income residents.
            - Was not carried forward, owing to a lack of support from PTAC.

Options Going Forward

SCEO has two options:

1. Adopt one of the base Commerce methodologies (A, A prime, or B).
    a. Adoption of A prime is recommended by PTAC.
2. Continue pursuing a custom methodology (method C).
    a. Any potential custom method will require clear guidance from SCEO on what changes are desired. There is no readily available data to accommodate such an exploration, so it would likely require a significant commitment of staff time.

Recommendation

PTAC recommends using HAPT Method A Prime. Method A Prime uses the same assumptions and calculations as Method A but allows for a distinction between rural County lands, unincorporated UGAs, and the incorporated jurisdictions. Additional details on this recommendation, along with the housing allocation numbers based on the current population allocation, can be found below.

Methodology Pros/Cons

Method	Pros	Cons
A	Equally distributes housing levels among jurisdictions, based on growth projections; Simplicity and clarity	Allocates low-income and emergency housing to rural areas
A Prime	Reserves lower-income housing for urban areas; Avoids placing emergency housing in rural areas	None identified by PTAC
B	Accounts for existing housing by allocating fewer units per income band to jurisdictions that have a larger share of housing in said income band than other jurisdictions	Allocates low-income and emergency housing to rural areas; creates negative housing allocations, the implications of which are not well understood.
C: Low-income jobs to low-income residents' ratio	Accounts for an additional piece of local analysis that factors in housing and employment locations, Identifying locations where lower wage jobs exist but not enough lower cost housing	What weight to give the analysis is unknown; Lack of support from jurisdictions; Concerns about the amount of time needed to perfect this methodology

Housing Allocation Numbers (Corrected)

	Method A Prime								
	Housing Allocation Income Bands								
		0-30% AMI							Temporary
	Total	Non-PSH	PSH	30-50%	50-80%	80-100%	100-120%	>120%	Emergency Housing
Total Countywide Allocation	75,184	19,905	5,714	13,620	8,844	4,772	3,937	18,392	3,037
Unincorporated UGA	22,946	6,375	1,830	4,362	2,699	1,456	1,202	5,022	973
Rural Outside UGA	3,534	0	0	0	416	225	185	2,708	0
Airway Heights	5,007	1,391	399	952	589	318	262	1,096	212
Cheney	2,535	704	202	482	298	161	133	555	107
Deer Park	1,023	284	82	194	120	65	54	224	43
Fairfield	0	0	0	0	0	0	0	0	0
Latah	0	0	0	0	0	0	0	0	0
Liberty Lake	6,601	1,834	526	1,255	776	419	346	1,445	280
Medical Lake	179	50	14	34	21	11	9	40	8
Millwood	36	10	3	7	4	2	2	8	2
Rockford	53	15	4	10	6	3	3	12	2
Spangle	0	0	0	0	0	0	0	0	0
Spokane (City)	17,550	4,875	1,400	3,336	2,066	1,115	918	3,840	744
Spokane Valley	15,713	4,365	1,253	2,987	1,848	997	823	3,440	666
Waverly	7	2	1	1	1	0	0	2	0

Note: Jurisdictions are NOT required to ensure that these units are built. They must simply have zoning, regulations and development codes that allow these units to be built.

Housing Allocation Numbers (Original)

	Method A Prime								
	Housing Allocation Income Bands								
		0-30% AMI							Temporary Emergency
	Total	Non-PSH	PSH	30-50%	50-80%	80-100%	100-120%	>120%	Housing
Total Countywide Allocation	75,184	19,905	5,714	13,620	8,844	4,772	3,937	18,464	3,037
Unincorporated UGA	22,946	6,375	1,830	4,362	2,699	1,456	1,202	5,022	973
Rural Outside UGA	3,534	0	0	0	416	225	185	2,780	0
Airway Heights	5,007	1,391	399	952	589	318	262	1,096	212
Cheney	2,535	704	202	482	298	161	133	555	107
Deer Park	1,023	284	82	194	120	65	54	224	43
Fairfield	0	0	0	0	0	0	0	0	0
Latah	0	0	0	0	0	0	0	0	0
Liberty Lake	6,601	1,834	526	1,255	776	419	346	1,445	280
Medical Lake	179	50	14	34	21	11	9	40	8
Millwood	36	10	3	7	4	2	2	8	2
Rockford	53	15	4	10	6	3	3	12	2
Spangle	0	0	0	0	0	0	0	0	0
Spokane (City)	17,550	4,875	1,400	3,336	2,066	1,115	918	3,840	744
Spokane Valley	15,713	4,365	1,253	2,987	1,848	997	823	3,440	666
Waverly	7	2	1	1	1	0	0	2	0

Note: These numbers, which were included in the original staff report, contain small errors that incorrectly represent the current HAPT allocation. These errors have been corrected in the table on the top of this page.

SPOKANE COUNTY STEERING COMMITTEE OF ELECTED OFFICIALS
1026 W Broadway • Spokane WA 99260-0170 • 509.477.1500 • bphelp@spokanecounty.org

December 17, 2024

Mary Kuney, Chair
Spokane County Board of County Commissioners
1026 W. Broadway Ave.
Spokane, WA 99260

RE: Steering Committee of Elected Officials Recommendation for the 2026-2046 Spokane County Housing for All Planning Tool (HAPT) methodology

Chair Kuney and Commissioners,

As required by the Spokane County Interlocal Agreement titled Growth Management Act (GMA Joint Planning) Section 3 D, I am forwarding the recommendation of the Steering Committee of Elected Officials (SCEO) regarding the adoption of the Spokane County Housing for All Planning Tool (HAPT) methodology for the planning period of 2026-2046 for use by the County and constituent communities in planning for future growth and housing allocations under the GMA.

The SCEO held a public hearing on the proposed amendment on September 25, 2024, and considered comments from the Planning Technical Advisory Committee (PTAC). There was no public comment or testimony in favor of or against the proposed amendment.

After deliberation, the Steering Committee unanimously recommended approval of the proposed Spokane County 2026-2046 HAPT methodology.

Sincerely,

Al French, Commissioner of Spokane County,
Chair, Spokane County Steering Committee of Elected Officials

Submit to Clerk of the Board with available supporting materials (Resolutions, Agreements, Presentations, etc.)

AGENDA SHEET

SUBMITTING DEPARTMENT: Building & Planning

CONTACT PERSON: Scott Chesney, Laurie Carver

PHONE NUMBER: 477-7212, 509-477-7127

CHECK TYPE OF MEETING BELOW:

☒ Regular Legislative Session Agenda

BELOW FOR CLERK'S USE ONLY:

Clerk's Resolution No.	25-0033
Approved:	Majority/Unanimous
Denied:	Majority/Unanimous
Renews/Amends No.	
Public Works No.	
Purchasing Dept. No.	

***AGENDA TITLE** (please provide a reasonably descriptive agenda title for this item):* Consider the SCEO Recommendation for the Housing for all Planning Tool Methodology (HAPT)

***DESCRIPTIVE SUMMARY** (please provide anticipated fiscal and budgetary information & reason for request):* On September 25, 2024, the Steering Committee of Elected Officials voted to adopt HAPT method A-Prime based on the Planning Technical Advisory Committee recommendation. Method A-Prime allocates housing units based primarily on the share of growth each jurisdiction is projected to receive.

***FISCAL IMPACT** (please provide anticipated fiscal and budgetary impact, with amount and source of funds, if applicable):* NA

***REQUESTED BOARD ACTION** (if any):*

Other County Departments Impacted - List any other departments that were notified in advance of this agenda item: Legal

This Item will need to be codified in the Spokane County Code: No

Spokane County

100.00%
Met Target

Sum of user inputs for jurisdiction shares. If below 100%, increase shares. If above 100%, decrease shares.

	Total	0-30% Non-PSH	0-30% PSH	>30-50%	>50-80%	>80-100%	>100-120%	>120%	Emergency Housing Needs (Temporary)
Countywide Estimated Housing Supply (2020)	221,840	6,613	937	34,798	91,803	32,035	20,981	34,673	1,192
Countywide Total Housing Needs (2046)	297,024	26,518	6,651	48,418	100,647	36,807	24,918	53,065	4,229
Countywide Additional Units Needed (2020-2046)	75,184	19,905	5,714	13,620	8,844	4,772	3,937	18,392	3,037

Permanent Housing Needs by Income Level (% of Area Median Income)

68.09% ← Minimum allocation to urban areas (cumulatively) to accommodate needs at all affordability levels. *This varies by county and population target.*

91.77% ← *Urban area combined % allocation from user inputs*

HOUSING ALLOCATION FROM SELECTED SHARES

Jurisdiction	Type	User Input - % Share of Countywide Housing Growth. Values must sum to 100%: User Input	Actual	Total Units Allocated (2020-2046)	0-30% Non-PSH	0-30% PSH	>30-50%	>50-80%	>80-100%	>100-120%	>120%	Emergency Housing Needs (Temporary) *
Unincorporated	Urban	26.99	26.89 %	20,292	4,948	1,420	3,385	2,745	1,481	1,222	5,091	755
Unincorporated	Rural	4.05	4.05 %	3,045	0	0	0	0	0	0	3,045	0
Airway Heights	City	5.26	5.26 %	3,955	1,141	328	781	465	251	207	782	174
Cheney	City	2.76	2.76 %	2,076	599	172	410	244	132	109	410	91
Deer Park	City	1.44	1.44 %	1,083	312	90	214	127	69	57	214	48
Fairfield	City	0.00	0.00 %	0	0	0	0	0	0	0	0	0
Latah	City	0.00	0.00 %	0	0	0	0	0	0	0	0	0
Liberty Lake	City	6.89	6.89 %	5,180	1,494	429	1,023	609	329	271	1,025	228
Medical Lake	City	0.44	0.44 %	329	95	27	65	39	21	17	65	15
Millwood	City	0.14	0.14 %	106	30	9	21	12	7	6	21	5
Rockford	City	0.09	0.09 %	68	20	6	13	8	4	4	13	3
Spangle	City	0.02	0.02 %	15	4	1	3	2	1	1	3	1
Spokane	City	29.74	29.74 %	22,359	6,452	1,851	4,413	2,631	1,418	1,170	4,424	983
Spokane Valley	City	22.18	22.16 %	16,661	4,806	1,380	3,289	1,960	1,058	872	3,296	733
Waverly	City	0.02	0.02 %	15	4	1	3	2	1	1	3	1

Permanent Housing Needs by Income Level (% of Area Median Income)

Attachment A

HAPT w/ Housing Share Input - Unincorporated UGA/Rural Reallocation

Recommendation for HAPT: Housing Share

PLANNING TECHNICAL ADVISORY COMMITTEE

Report and Recommendation to the Steering Committee of Elected Officials

Periodic Update under the Growth Management Act, 2026 to 2046

Written and Recommended by PTAC, January 2025

Executive Summary

The Planning Technical Advisory Committee (PTAC) has identified a possible issue with previous runs of the Housing for All Planning Tool (HAPT), which all communities planning under the Growth Management Act have been advised to use when allocating housing by affordability for the region. The intended input for the tool—the data that is provided to the tool and then used to calculate each jurisdictions' housing allocation—is the share of housing growth each jurisdiction is expected to accommodate. Unfortunately, due to unclear instructions, the previous HAPT outputs shared with the Steering Committee of Elected Officials (SCEO) used the share of population growth instead.

Following a review of the data and the HAPT itself, **the PTAC recommends that the region use housing growth share as the input for the HAPT**, specifically a housing growth share created by applying the same assumptions built into the HAPT tool itself to convert the adopted population share to housing share.

Of note, this recommendation does not affect which method within HAPT is utilized. The existing SCEO recommendation for the method known as "A Prime" is not affected by PTACs recommendation in this memo.

The full output of the HAPT, assuming that housing share generated in the way recommended by PTAC is used, is attached to the end of this memo.

Introduction

Following the SCEO vote to recommend Method "A Prime" when using the HAPT, the members of PTAC identified that there had been some confusion as to which inputs should be provided to the HAPT when calculating housing share. As a result, PTAC's Housing Subcommittee met several times in the third and fourth quarters of 2024 to consider how this might affect the housing allocation output from HAPT. In essence, it appears to PTAC that the HAPT was intended to be provided with the share of housing growth each jurisdiction is expected to accommodate, while previous use of the HAPT utilized the share of population growth instead.

After discussing this at length, PTAC has developed a method for converting the currently adopted Population Share[1] to housing growth share, which can then be input into HAPT. This memo outlines the recommendation by PTAC for doing this, and provides the summary growth numbers for each jurisdiction that results.

HAPT Method A Prime

At their meeting on September 25, 2024, the SCEO voted to recommend the use of the "A Prime" method in the HAPT. Throughout this discussion and recommendation by PTAC, no change to this method is anticipated or recommended. PTAC feels that SCEO's original recommendation, adopted on September 24, 2024, does not require revision to accommodate PTAC's recommendations herein.

---

[1] Adopted by BOCC Resolution 24-0348 on June 18, 2024.

Housing Share versus Population Share

When PTAC and SCEO previously saw the "A Prime" results, it was always using the share of population growth assigned to each jurisdiction per the adopted allocation[2]. However, after multiple conversations within PTAC and with Commerce staff, it was apparent that the instructions in HAPT were unclear and that the tool was instead asking for the share of housing growth.

The share of population growth and the share of housing growth *are* directly related to each other, but due to certain factors they are rarely the same number for a given jurisdiction. For instance, household size (people per household) in each jurisdiction is not the same nor does it stay static over time. Household size is continually changing from year to year. Furthermore, some jurisdictions contain a larger amount of group quarters housing (i.e. college dorms, prisons, treatment centers) and that rate changes over time. Those living in group quarters do not require additional housing units, thus they must be subtracted from the overall population growth share for each jurisdiction.

Because of these factors, it is important to develop a share of housing each jurisdiction for the entirety of the planning horizon (through 2046), not just today. Jurisdictions differ from each other and some attempt to differentiate their allocations accordingly should be made as well.

A Note on the Underproduction of Housing

An additional factor has been raised by public commenters and PTAC members that is worth discussing here. That factor is the known historic underproduction of housing statewide. Commerce's research has made it clear that development in jurisdictions across the state have been lower than what is required to house existing populations. As a result, many jurisdictions' current housing stock is already too small to accommodate the need of the existing population, not to mention the growth that is coming.

It is important to note that HAPT factors this underproduction into its results. Accordingly, the number of housing units a jurisdiction may be allocated when using HAPT will appear high when compared to population growth. This is specifically because HAPT attempts to also allocate sufficient housing to accommodate the recent underproduction of housing *as well as* future growth. This condition is true regardless of which input is used for HAPT.

Determining Housing Share

The Department of Commerce has not provided jurisdictions with a method for calculating housing growth share. Likewise, GMA does not mandate that Cities and Counties use a particular method to develop housing share. However, the PTAC subcommittee found that the HAPT itself provides one possible method.

While PTAC spent considerable time exploring other ways to convert population growth to housing growth, ultimately PTAC felt that because the resulting housing share would be input into HAPT, it was most defensible to use the assumptions already built into HAPT to calculate housing share. That way, the same set of assumptions would be applied to all parts of the tool and any unintentional bias or modification of results would be minimized.

[2] Adopted by BOCC Resolution 24-0348 on June 18, 2024.

Essentially, the housing share for each jurisdiction would be calculated directly from the population share already adopted by the BOCC. While it is more sophisticated than can be expressed simply here, the method for calculating housing share from population share is generally[3] as follows:

[(Population Share – Group Quarters Population) / Household Size] + 6% to Account for Vacant Homes

For the purposes of the HAPT, the tool assumes that household size is shrinking over time and that each jurisdiction will see the same share of group housing in the County as they are in 2020. The resulting housing share for each jurisdiction and area is as shown in the following table. Again, when considering the resulting housing share, the following should be kept in mind:

- Population share and housing share are not the same thing, though they are related to one another.
- Housing share in the tool is somewhat elevated to account for historic underproduction of housing.

Table 1: Population and Housing Share Compared

Jurisdiction	Share: Population Growth	Share: Housing Growth
Spokane County (Whole)	100.00%	100.00%
All Unincorporated Areas	35.21%	31.14%
Unincorporated Rural	4.70%	8.24%
Unincorporated UGA	30.51%	22.81%
Incorporated County	64.79%	68.95%

Jurisdiction	Share: Population Growth	Share: Housing Growth
Airway Heights	6.66%	5.26%
Cheney	3.37%	2.76%
Deer Park	1.36%	1.44%
Fairfield	0.00%	0.00%
Latah	0.00%	0.00%
Liberty Lake	8.78%	6.89%
Medical Lake	0.24%	0.44%
Millwood	0.05%	0.14%
Rockford	0.07%	0.09%
Spangle	0.00%	0.02%
Spokane	23.34%	29.74%
Spokane Valley	20.90%	22.16%
Waverly	0.01%	0.02%

As shown in the table, when comparing population share to housing share, some jurisdictions are expected to accommodate a lower share of housing growth than population growth (e.g. Liberty Lake) while others are shown to expect a higher share of housing than population (e.g. the City of Spokane). Why this happens is complex and due to the fact that HAPT uses multiple factors from multiple sources to determine these amounts.

Because the HAPT only has one input for each jurisdiction—share of housing growth—those jurisdictions where the housing share is larger than population share can expect their housing number output from HAPT to increase when compared to the sample outputs discussed by SCEO previously. Conversely,

[3] The assumptions in HAPT are more sophisticated than this, accounting for changes over time and each jurisdiction's share of certain values. Replication of the numbers herein by using this simplified equation should not be considered when evaluating this recommendation.

jurisdictions with smaller housing share than population share can expect their HAPT output to decrease over earlier results.

Comparing HAPT Results from Prior Versions and Now

As a handy comparison of how overall housing allocations would change when housing share is input into HAPT rather than population share, the table at right lists the total housing allocation using both inputs. Also shown is whether the total housing units would increase or decrease for each jurisdiction when using housing share, as the tool intended.

While housing share is the intended input for HAPT, using housing share would increase the housing allocation to the rural areas (outside the UGA). To a greater degree, the larger jurisdictions would also be subject to a larger allocation.

It's important to note that while this represents a large change for some jurisdictions, increased allocations to those communities in the center of the UGA (City of Spokane, Spokane Valley) is consistent with the requirements of GMA, wherein growth should be concentrated in the UGA and limited on the edges.

Table 2: Comparison of HAPT Total Housing by Jurisdiction

Jurisdiction	Total New Units: Using Pop Share	Total New Units: Using Housing Share	Change if Using Housing Share
Unincorporated Rural	3,534	6,195	Higher
Unincorporated UGA	22,946	17,142	Lower
Airway Heights	5,007	3,955	Lower
Cheney	2,535	2,076	Lower
Deer Park	1,023	1,083	Higher
Fairfield	0	0	Higher
Latah	0	0	Higher
Liberty Lake	6,601	5,180	Lower
Medical Lake	179	329	Higher
Millwood	36	106	Higher
Rockford	53	68	Higher
Spangle	0	15	Higher
Spokane	17,550	22,359	Higher
Spokane Valley	15,713	16,661	Higher
Waverly	7	15	Higher

While the allocation for unincorporated rural areas would be more than 3/4 larger, that increase would be spread throughout a very large area (all parts of the County outside the UGA), tempering the effects of that growth somewhat. Furthermore, urban scale services to those additional homes would not be required due to their location.

PTAC Recommendations: Housing Share and HAPT

Following multiple discussions on the differences between population share and housing share, PTAC generally feels that housing share, created using the same assumptions already built into the HAPT, is the most defensible and effective input for the HAPT. The following benefits of using housing share discussed were as follows:

- The assumptions used to generate housing share from population share are identical to those in the HAPT now.
- The HAPT model is sophisticated—an adjustment in one variable can have unintended consequences.
- The data used to generate housing share have already been considered and adopted by the BOCC.

Final Results

If the share of housing growth indicated in Table 1 in input into the HAPT, and the method previously described as Method A Prime in the SCEO recommendation is utilized, then the final housing allocation shown in the attached spreadsheet is provided.

Spokane County

	Total	0-30% Non-PSH	0-30% PSH	>30-50%	>50-80%	>80-100%	>100-120%	>120%	Emergency Housing Needs (Temporary)
	Permanent Housing Needs by Income Level (% of Area Median Income)								
Countywide Estimated Housing Supply (2020)	221,840	6,613	937	34,798	91,803	32,035	20,981	34,673	1,192
Countywide Total Housing Needs (2046)	297,024	26,518	6,651	48,418	100,647	36,807	24,918	53,065	4,229
Countywide Additional Units Needed (2020-2046)	**75,184**	**19,905**	**5,714**	**13,620**	**8,844**	**4,772**	**3,937**	**18,392**	3,037

68.09% ← *Minimum allocation to urban areas (cumulatively) to accommodate needs at all affordability levels. This varies by county and population target.*

91.77% ← *Urban area combined % allocation from user inputs*

HOUSING ALLOCATION FROM SELECTED SHARES

		User Input - % Share of Countywide Housing Growth. Values must sum to 100%	Total Units Allocated (2020-2046)	0-30% Non-PSH	0-30% PSH	>30-50%	>50-80%	>80-100%	>100-120%	>120%	Emergency Housing Needs (Temporary) *
		User Input	Permanent Housing Needs by Income Level (% of Area Median Income)								
Unincorporated County	Existing Combined (Estimate)	=	59,013	1,179	0	5,981	14,559	9,421	9,603	18,270	30
	Future Inside UGA	22.81	**17,149**	4,948	1,420	3,385	2,017	1,088	898	3,393	755
	Future Outside UGA	8.23	**6,188**	0	0	0	728	393	324	4,743	0
Airway Heights	Existing (Estimate)	5.26	3,626	67	0	685	1,997	545	134	198	0
	Future Allocation		**3,955**	1,141	328	781	465	251	207	782	174
Cheney	Existing (Estimate)	2.76	5,354	256	0	935	3,097	690	153	223	0
	Future Allocation		**2,076**	599	172	410	244	132	109	410	91
Deer Park	Existing (Estimate)	1.44	1,902	45	0	434	804	275	99	245	0
	Future Allocation		**1,083**	312	90	214	127	69	57	214	48
Fairfield	Existing (Estimate)	0.00	228	5	0	79	104	23	5	12	0
	Future Allocation		**0**	0	0	0	0	0	0	0	0
Latah	Existing (Estimate)	0.00	88	0	0	35	41	6	2	4	0
	Future Allocation		**0**	0	0	0	0	0	0	0	0
Liberty Lake	Existing (Estimate)	6.89	4,915	39	0	208	1,133	1,238	930	1,367	0
	Future Allocation		**5,180**	1,494	429	1,023	609	329	271	1,025	228
Medical Lake	Existing (Estimate)	0.44	1,828	184	0	159	839	329	96	221	0
	Future Allocation		**329**	95	27	65	39	21	17	65	15
Millwood	Existing (Estimate)	0.14	820	27	0	147	413	142	37	54	0
	Future Allocation		**106**	30	9	21	12	7	6	21	5
Rockford	Existing (Estimate)	0.09	195	0	0	62	85	25	7	16	0
	Future Allocation		**68**	20	6	13	8	4	4	13	3
Spangle	Existing (Estimate)	0.02	127	6	0	42	56	12	3	8	0
	Future Allocation		**15**	4	1	3	2	1	1	3	1
Spokane	Existing (Estimate)	29.74	99,938	3,534	937	19,479	47,090	11,873	7,118	9,907	1,134
	Future Allocation		**22,359**	6,452	1,851	4,413	2,631	1,418	1,170	4,424	983
Spokane Valley	Existing (Estimate)	22.16	43,751	1,265	0	6,515	21,579	7,456	2,792	4,144	0
	Future Allocation		**16,661**	4,806	1,380	3,289	1,960	1,058	872	3,296	733
Waverly	Existing (Estimate)	0.02	55	6	0	37	6	0	2	4	0
	Future Allocation		**15**	4	1	3	2	1	1	3	1

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Submit to Clerk of the Board with available supporting materials (Resolutions, Agreements, Presentations, etc.)

AGENDA SHEET

SUBMITTING DEPARTMENT: Building & Planning

CONTACT PERSON: Scott Chesney, Rona Smith, Matthew Folsom

PHONE NUMBER: 477-7212, 509-477-7139, 509-477-5719

CHECK TYPE OF MEETING BELOW:	***BELOW FOR CLERK'S USE ONLY:***	
☒ Regular Legislative Session Agenda	Clerk's Resolution No.	26-0375
	Approved:	Majority/Unanimous
	Denied:	Majority/Unanimous
	Renews/Amends No.	
	Public Works No.	
	Purchasing Dept. No.	

***AGENDA TITLE** (please provide a reasonably descriptive agenda title for this item:* Consider the Steering Committee of Elected Officials' Recommendation to allocate housing units to Spokane County jurisdictions for the planning period of 2026-2046.

***DESCRIPTIVE SUMMARY** (please provide anticipated fiscal and budgetary information & reason for request):* The Comprehensive Plan process requires that the BoCC allocate growth of population and housing to the various jurisdictions for the upcoming twenty-year plan horizon. Upon recommendation of the Steering Committee of Elected Officials, the BoCC adopted a methodology to make these allocations January 21, 2025 based on population projections. The Steering Committee, at the request of the Department of Commerce, switched to a housing-unit input for these allocations. The SCEO held a public hearing on the two approaches and recommended the housing-unit input mode to the BoCC for approval of the allocations by income band and by jurisdiction.

***FISCAL IMPACT** (please provide anticipated fiscal and budgetary impact, with amount and source of funds, if applicable):* N/A

***REQUESTED BOARD ACTION** (if any):* Acceptance of the SCEO recommendation and adoption of the resolution allocating housing in Spokane County jurisdictions by income bands for the planning period 2026-2046

Other County Departments Impacted - List any other departments that were notified in advance of this agenda item: Legal

This Item will need to be codified in the Spokane County Code: No

2025 Land Capacity Analysis

for the City of Spokane, Washington

a requirement of the Growth Management Act (RCW 36.70A.115)

February, 2025

PLANSPOKANE

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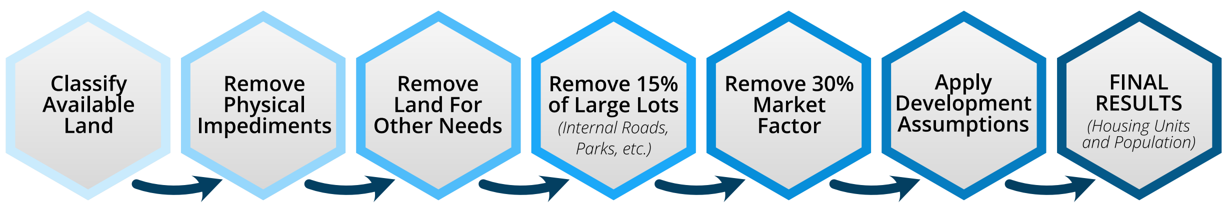
Figures

Executive Summary

The Land Capacity Analysis (LCA) is a required part of the periodic update of the City of Spokane Comprehensive Plan. The Growth Management Act (GMA) requires the City to determine if sufficient land exists to accommodate growth early in the overall process. The City of Spokane is expected to grow by more than 23,000 people between 2023 and 2046.

To determine the capacity of the City, the LCA is guided by a regionally adopted methodology. In summary, that method follows the general steps shown in **Figure 1** below:

Figure 1: Schematic Land Capacity Analysis Process



The analysis begins by classifying land as either vacant, partially used, underutilized, or developed. Land is removed that is physically unavailable for development (such as steep slopes, wetlands, etc.), lands needed for other uses (parks, utilities, etc.) are removed, 15 percent of large lots is removed (need for roads, parks, etc.), and 30 percent of the total is removed to account for market forces limiting development. Finally, general development assumptions are applied to the remaining lands (units per acre, people per household, etc.) resulting in a number of dwelling units the City could physically expect to accommodate and the population those units could house.

Assumptions applied by the City in this analysis included:

- Density (units per acre) expected in each zoning group.
- The proportion of expected residential development outside purely residential zones (i.e. Commercial, Office).
- Previously approved and vested land use actions (Planned Unit Developments, Environmental Impact Statements, other reliable sources of data).
- Historic development data and trends.
- Persons per household by housing type.

These factors were applied to lands in the city, resulting in the following capacity results:

Figure 2: Summary Results—City Capacity for Dwellings and Population

Classification	Dwelling Unit Capacity	Population Capacity
Vacant, Outside PUD/Subarea	10,344	22,615
Partially Used, Outside PUD/Subarea	5,270	11,850
Underutilized, Outside PUD/Subarea	6,987	13,220
SUBTOTAL	**22,600**	**47,686**
VESTED/SUBAREAS	**7,517**	**15,615**
GRAND TOTAL	**30,117**	**63,301**

Source*: City of Spokane, LCA Analysis, 2024.*

Notes*: This table is a summary of the detailed analysis within this report. Many factors not apparent in this table went into the data presented.*

Ultimately, the City of Spokane has determined that sufficient zoned land exists within City Limits to accommodate expected growth within the planning horizon of 2046. For details of this analysis, including more specifics on the assumptions that were applied to the numbers in Figure 2 above, see the body of this report.

I. Introduction

This report represents the culmination of more than two years of work by City of Spokane staff as they prepared for the 2026 statutorily required Comprehensive Plan Periodic Update. The Land Capacity Analysis (LCA) is a required early step in the update process, during which the region must ask the important question, "is there sufficient capacity to accommodate growth expected in the next 20 years?"

The process by which regional jurisdictions determine their answer to this question is laid out in general in the Countywide Planning Policies (CPPs), adopted by the Spokane County Board of County Commissioners (BOCC) and agreed to by all jurisdictions planning under Revised Code of Washington (RCW) 36.70A. In the case of the Spokane County CPPs, the region undertook a major update of those policies and procedures in 2023 and 2024, culminating in the process described in this report.

The following report is limited to the City of Spokane municipal boundary and will flow through the required steps of the CPPs as they relate to the preparation of LCAs, with certain clarifying changes to organization and order to ensure that the results of this analysis are clear to the reader. The City has not deviated from the general requirements of the CPP methodology to ensure that the results of this analysis can be generally synthesized together with other jurisdictions' results, in order that the County may understand an overall picture of the Urban Growth Area (UGA) in total.

II. Report Preparation

In general, each jurisdiction is responsible for generating its own LCA according to its own internal processes, staff, and expertise. Each jurisdiction has a unique set of land use and zoning regulations. In the case of this LCA for the City of Spokane, several staff members have been involved, including the following:

Project Manager & Chief Analyst:	Kevin Freibott, Senior Planner
Planning Director:	Spencer Gardner, AICP
Deputy Planning Director:	Tirrell Black, AICP
Planner & Analyst:	Brandon Whitmarsh, Planner II
Planner:	Tyler Kimbrell, Planner II
Planner:	KayCee Downey, Planner II
Economic Development:	Teri Stripes, Principal Planner

The results of this report will be presented to both the Spokane Plan Commission and the Spokane City Council in early 2025. Furthermore, the results will inform the ongoing work at the City on the update of its 2026 comprehensive plan.

III. Growth Allocations

Prior to every required comprehensive plan update, the Washington Office of Financial Management (OFM) provides a forecast showing possible population growth for the entire County. In the case of Spokane County, the last round of forecasts was issued by OFM in 2022, providing a range for countywide growth through 2050. By the requirements of GMA, jurisdictions in Spokane County are required to plan their next update to consider growth from 2026 to 2046 (20-years). As such, the OFM forecast covers more than enough time for any local analysis.

When OFM provides an updated population forecast, they typically offer three levels of growth: high, middle, and low. The middle level represents the forecast statistical mean, while the high and low ranges provide the maximum and minimum growth regional jurisdictions can use if they prefer to adjust the medium upwards or downwards according to local conditions or specific data not generally available to OFM.

In the case of Spokane County, the Steering Committee of Elected Officials (SCEO) recommended (and the BOCC adopted) the middle forecast for overall growth in the County. Accordingly, Spokane County should expect that growth in the County follows the curve shown in **Figure 3** on the following page. According to the adopted forecast, Spokane County must plan for a 2046 population of 654,665. Compared to the 2023 population for the county of 554,600, the County must plan to grow by 100,065 people between 2023 and 2046. The level of growth represents an increase of 18 percent over twenty years, or approximately 0.9 percent per year.

Following adoption of the countywide growth forecast, the SCEO recommended allocating growth among the individual jurisdictions and areas according to a 10-year historic growth trend. Reviewers should note that only four years of data was readily available for areas outside incorporated boundaries (cities and towns) due to the changing size of the UGA.

According to the growth apportionment adopted by BOCC (see **Figure 4**), the City of Spokane must plan to grow by 23,357 between 2023 and 2046, growing approximately 10 percent overall throughout the 23 years. This represents approximately 1,015 people per year, though actual growth is expected to fluctuate up and down from year to year.

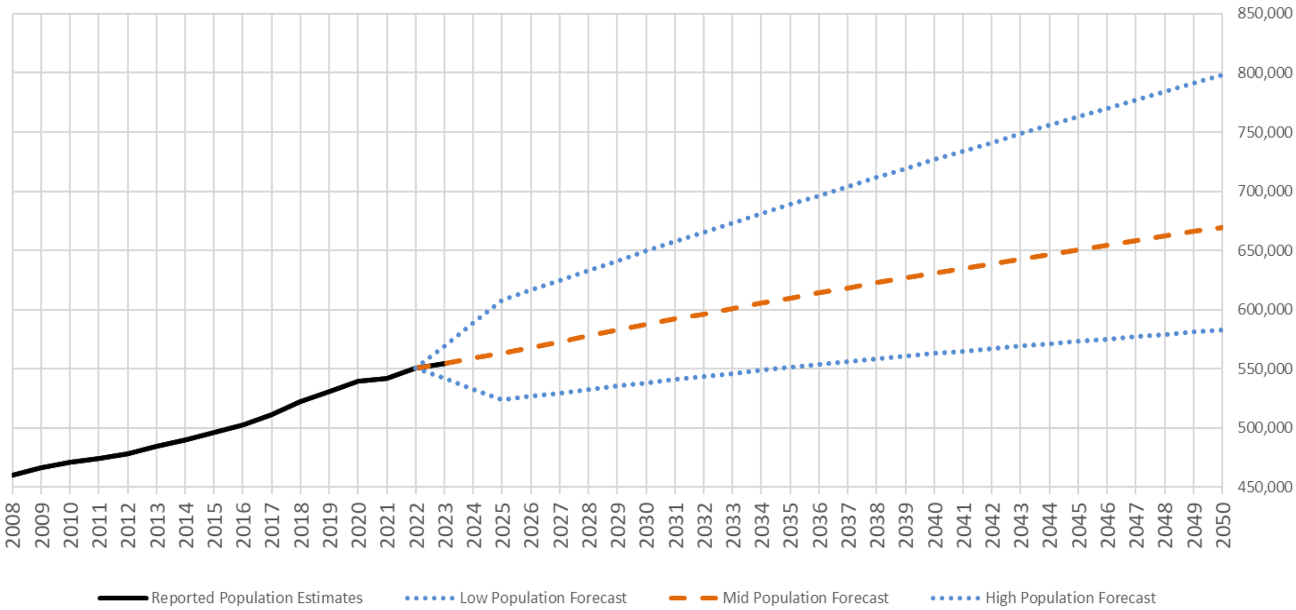
For the purposes of the LCA, the City must determine if there is sufficient land capacity remaining in the city boundaries to accommodate 23,357 more people. To do this, the City has conducted the analysis outlined in this report, consistent with the methodology provided by the CPPs.

IV. Methodology Basic Considerations

The function of the LCA is primarily residential. Commercial and Industrial zoned property is roughly categorized and quantified, but there is no agreed upon regional methodology to determine the amount of commercial and industrial land needed to accommodate growth. Accordingly, this study will not provide information as to whether the City can accommodate expected commercial/industrial growth.

To determine residential capacity, the LCA methodology provides a few basic steps, each with its own assumptions and applications, ultimately seeking to answer the main question of the overall analysis, whether the jurisdiction have sufficient land to

Figure 3: 2022 Spokane County Growth Estimates (Low, Mid, High) by WA Office of Financial Management



***Source**: OFM, December 2022.*

***Notes**: Reported population estimates have been corrected by annual jurisdiction reports through 2023. Middle forecast represents the mathematically calculated growth trend based on historic data and is the most likely scenario for growth in Spokane County. High and low estimates are generated by an average over/under percentage growth rate, representing the maximum and minimum expected growth.*

Figure 4: Adopted Growth Allocation–Spokane County and Incorporated Cities and Towns

Jurisdiction	2023 Population	% of Total in 2023	% of Future Growth	Additional Population by 2046	Total Population in 2046
Spokane County (Whole)[1]	554,600	100.00%	100.00%	100,065	654,665
Unincorporated Outside UGA	93,934	16.94%	4.70%	4,708	98,642
Unincorporated Inside UGA	69,456	12.52%	30.51%	30,528	99,984
Airway Heights	11,280	2.03%	6.66%	6,665	17,945
Cheney	13,160	2.37%	3.37%	3,375	16,535
Deer Park	4,925	0.89%	1.36%	1,365	6,290
Fairfield[2]	600	0.11%	0.00%	0	600
Latah[2]	185	0.03%	0.00%	0	185
Liberty Lake	13,150	2.37%	8.78%	8,784	21,934
Medical Lake	4,915	0.89%	0.24%	244	5,159
Millwood	1,925	0.35%	0.05%	49	1,974
Rockford	570	0.10%	0.07%	66	636
Spangle[2]	280	0.05%	0.00%	0	280
Spokane (City)	**232,700**	**41.96%**	**23.34%**	**23,357**	**256,057**
Spokane Valley	107,400	19.37%	20.90%	20,913	128,313
Waverly	120	0.02%	0.01%	11	131

***Source**: SCEO, May 2024.*

***Notes**: 1. The Spokane County whole population number for 2046 conforms to the middle forecast issued by OFM in 2022.*
2. These three assume zero population growth, though each community is expected to grow very slightly over twenty years. Trend data was not sufficient to determine to what degree this might occur, given the very small geographic area each community represents.

accommodate growth. To this end, the process includes the following general steps:

1. Classify land into three categories, each of which represents at least some amount of capacity, including:

    a. Vacant: Land in a generally undeveloped state, inside which the jurisdiction can expect future development.

    b. Partially Used: Land which contains some development but also sufficient vacant/undeveloped land to allow for future development.

    c. Underutilized: Land which has been designated or zoned for more intense use, but currently contains less intense development (i.e a single-unit house on a parcel zoned for multi-unit development).

2. Subtract from those lands any of the following:

    a. Unbuildable areas such as wetlands, steep slopes, unstable soils, critical areas, etc.

    b. Areas needed for other uses, such as internal roadways/infrastructure, open space, power transmission, transportation uses, etc.

    c. Any other lands that the jurisdiction has information precluding its redevelopment or use as residential capacity (i.e. areas of known subsurface pollution, publicly owned property, future needs of essential public facilities like schools or airports).

3. Subtract a percentage of the total capacity to account for market factors, essentially topics that limit development but are generally unknown or unquantifiable (willingness of individual property owners to redevelop/ develop, sales of property, etc.)

4. Multiply the remaining areas by an assumed density (units/acre), resulting in the capacity in dwelling units available in the jurisdiction.

5. Multiply the number of units by an assumed number of people per unit, resulting in the theoretical population that can be accommodated by those areas.

While the LCA methodology included in the CPPs requires the use of these overall steps, some flexibility exists within the process to allow jurisdictions to use better information when available and to adjust the assumptions to conform to local policy/ vision, understanding, and technical knowledge. The following list represents some of the adjustments and deviations that can be made at the local level when conducting an LCA, as allowed by the regionally adopted methodology:

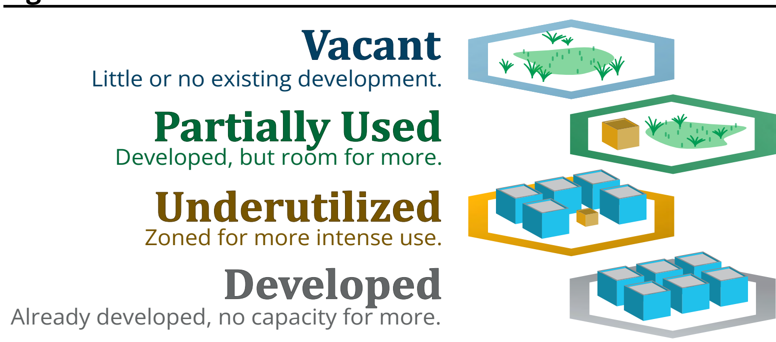
- If a jurisdiction has conducted a local area study that provides much more specific information on development capacity of a given area, that information can be used instead.[1]

- Each jurisdiction can determine the assumed density of their zones/land uses as well as the potential people per dwelling unit of various uses and residential types.
- Guidance in the LCA as to which properties may qualify as "vacant," "partially used," or "underutilized" are basic guidelines, which Cities can augment with their own analysis and understanding.
- The City's current land use map and zoning map inform future development, where it will occur, and to what intensity. The LCA assumes that the local designations continue as they are. In other words, changes that may be introduced during the periodic update to the comprehensive plan but which have not yet been adopted are not included in this analysis.
- Even though most local jurisdictions have not adopted zoning regulations commensurate with the requirements of House Bill 1110 (the "Middle Housing" bill), jurisdictions may assume that local development capacity calculations include increased unit counts/density commensurate with the changes required by HB 1110, as those changes are not optional for most cities even if they have not yet adopted them.

V. LCA Step 1: Land Classification

The first step in the LCA process is to classify the City's land into one of four possible areas: vacant, partially used, underdeveloped, and 'developed.' Developed areas do not provide residential capacity within the 20-year planning horizon and thus are not discussed or categorized here. However, the other three classifications represent specific physical conditions and potential capacity in different ways. The categories are shown in summary in **Figure 5** at left, and described in detail, as follows:

Figure 5: LCA Land Classifications



Vacant Land

Vacant land is that which contains no or virtually no existing development. In general, the methodology states that vacant lands are those with an assessed improvement value of less than $5,000. However, jurisdictions may–and in this case the City of Spokane did–

[1] For instance, the City of Spokane has recently completed an Environmental Impact Statement (EIS) for the South Logan Transit-Oriented Development Study. This EIS includes exact residential development capacity of the Preferred Alternative, which has thus been adopted by the City and incorporated into the Zoning Code, Zoning Map, and Comprehensive Plan. Accordingly, the City will be using the EIS to inform capacity in that area rather than the overall LCA methodology.

amend this based on review of the individual parcels themselves or by use of other more detailed studies.

In the case of the City of Spokane, staff used the $5,000 value cap as a method for selecting *possible* vacant parcels. However, this list was then augmented using a number of sources, including:

- **City Permit reporting**, including demolitions and new building permits, which allowed the City to account for conditions that may have changed faster than the County Assessor could update their data.

  Effect on Analysis: Increased capacity.

- **Review of both 2022 and 2024 high-resolution aerial photography**, to identify parcels where assessor data was either in error or physical conditions may preclude a parcel from development.

  Effect on Analysis: Refined classification, both increasing and decreasing capacity by local conditions.

- **Public property lists and rolls**, eliminating not only property owned by the City itself and its various departments and functions, but also quasi-public lands such as those owned by Avista or other NGOs operating in the area.

  Effect on Analysis: Reduced capacity.

- **Use of parcel data as well as City records** to eliminate parcels with zero improvement value but actually containing development. This occurs frequently where development spans more than one parcel, but for the purposes of not double taxing the property owner the County Assessor limits improvement value to only one of the parcels. A significant example is Riverpark Square, the mall downtown, which sits on seven parcels, only one of which shows any improvement value in County parcel data.

  Effect on Analysis: Reduced capacity.

- **Planned Unit Development (PUD) data**[2]. The City of Spokane currently contains more than 130 PUD overlays of varying age and size. Because PUDs include a greater level of detail and typically include significant information relating to capacity and future residential development, these areas were handled separately by the City. See later in this report for an accounting of the capacity generated by PUDs in the city.

  Effect on Analysis: Increased capacity as well as better specific information.

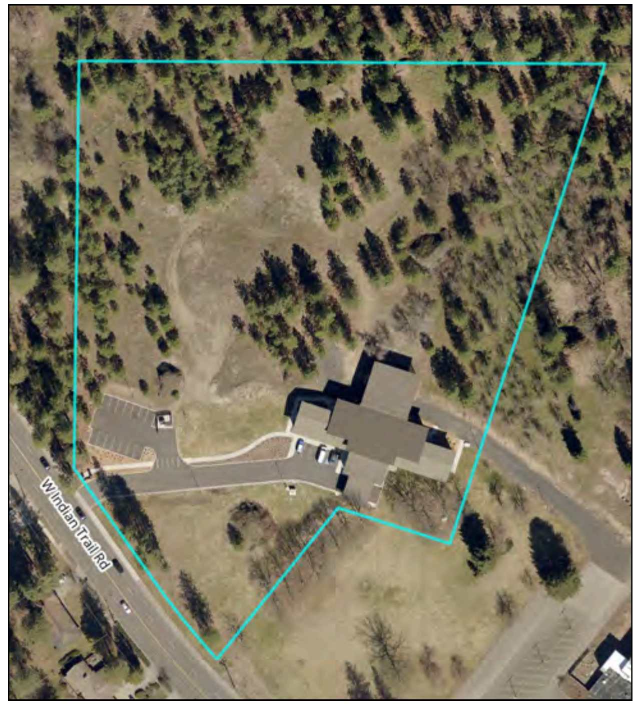
Partially Used Land

According to the adopted methodology, partially used land is that which may contain

[2] In almost all cases, PUD data was gleaned from both plat maps and Hearing Examiner decisions on record with the City.

some development, such as a single house, but the lot size is large enough to either be subdivided and built out at a greater number of units, or simply developed with additional residential units on the same property. A good example of a partially used lot is shown in **Figure 6** at right. This parcel is large (6.9 acres) and contains a small service use with surface parking and a driveway. This parcel is certainly not vacant and it's possible future sale and/or subdivision and development could provide a significant number of units in residential capacity. In fact, the owner of this parcel is currently working on permits to fill the remaining land with homes.

Figure 6: Example of a Partially Used Parcel



The LCA methodology suggests that jurisdictions consider partially used parcels to be those that exceed eight times the minimum lot size for that zone, such that the given parcel could be subdivided into at least eight separate developable lots. The City of Spokane utilized this factor to help select *possible* partially used lots, but augmented the search using locally available data. Most significantly, City staff was able to use existing building footprint data compared to the overall parcel area to determine lots that might not meet the "eight times the minimum lot size" condition but might be found in locations ripe for redevelopment and subdivison. This included areas where the City feels infill development pressure is high enough to impel property owners to consider multi-unit improvements on larger lots where the economy of scale was previously not sufficient to consider such a move.

In addition to the physical properties of the site, it is important to note that changes to the Spokane Municipal Code (SMC) in 2024 allow for multiple units to be built on all R1 and R2 zoned parcels, in line with the requirements of HB 1110, the Middle Housing Bill[3]. Because of this, the "eight times' minimum is not the only factor used by staff when identifying possible 'partially used' sites.

Every parcel identified as partially used in this analysis was considered on a site-by-site basis to winnow out any parcels that might be large enough but for which there are extenuating conditions or situations that preclude development. Parcels eliminated by this additional review reduced capacity somewhat overall. One of these related to the value of the overall improvements on the property, as suggested by the LCA methodology

[3] *Washington State House Bill 1110 (2023)*

itself. In the case where the home and improvements were significantly valuable to prevent likely redevelopment of the site those sites have been discounted from the total capacity.

Just because a parcel is designated partially used does not mean that the City expects it to provide future residential capacity. Adjustments have been made on a parcel-by-parcel basis to ensure that a conservative estimate of units on ‘partially used’ land was provided.

Underdeveloped Land

Underdeveloped land is far simpler to identify than perhaps the other two categories, in that its definition is the most concise. Underdeveloped land is that which contains an existing developed use but that use is at a lower density or intensity than what has been designated in the City’s comprehensive plan or zoning. For example, a single-unit home in a multi-unit zone would be considered underdeveloped. Likewise, a single-unit home in a commercial zone is technically underdeveloped, as the SMC allows for higher intensity residential development in all commercial zones.

Underdeveloped land is common in areas where zoning has changed over the years, or the City has amended its growth strategy significantly in the past. One example exists south of E Sprague Ave, along the Sprague Center[4]. This area is zoned RMF (residential multi-family) but is occupied by predominantly single-unit homes. Accordingly, the area represents additional residential capacity and is thus classified as underdeveloped in the City’s analysis.

Multiple Classifications

A vacant parcel naturally contains zero development, preventing that parcel from being classified partially used or underdeveloped. Therefore, being classified vacant is an exclusive condition. However, the same is not true for partially used and underutilized parcels. Because the partially used category concerns the amount of development on a site and underutilized only concerns the type of that development, it’s possible for a parcel to be classified as both. Three such parcels in the City of Spokane meet the qualifications for both partially used and underutilized status. Each of the three are currently zoned for Industrial use precluding any residential development[5]. Thus, they do not have any impact on the City’s residential capacity or the conclusions of this report.

Secondary Review and Error Checking

There are nearly 81,000 parcels in the City of Spokane, 8,900 of which have been classified as either vacant, partially-used, or underdeveloped. While in limited cases staff has reviewed individual parcels (as described above), the sheer number of parcels is simply too large to allow for a site-by-site analysis of all classified parcels.

Also of note, Staff pulled all parcel data for the City from the County Assessor’s parcel

[4] *See “Centers and Corridors” as described by the City’s Comprehensive Plan, the City’s primary growth strategy since 2001.*

[5] *Per SMC Table 17C.130.100-1*

data in March 2024. Some permit data was used to update the parcels since that date, but to avoid conflicts and errors in the data from multiple extractions, staff has not made a full copy of the parcel data to work from since that date. As such, some development or other changes to a few of the classified parcels may have occurred between the time the data was pulled for analysis and the publication of this report.

Furthermore, no data set of this size is perfect. There are errors inherent in any large information system like this. Where errors were identified along the way, such as incorrect improvement values or owner status, staff has made corrections to the data manually. However, while staff has done their best to eliminate any errors as they have been identified, it's possible that a few may have been missed, solely because of the enormous scale of the analysis.

Reviewers are reminded that if an error is identified for a single parcel on a map or other part of this document, that is not indicative of an error in the overall analysis. An LCA is intended to be a city-scale exercise, not a site-by-site consideration. Nor is a site-by-site level of detail necessary to come to a conclusion as to the overall capacity a City contains.

Exception for Planned Unit Developments (PUDs)

Because a PUD includes a greater degree of certainty as to the future build-out of the area, the City has chosen not to utilize the LCA methodology when determining the capacity of these areas. If a PUD is approved and development is vested (usually by the adoption of one or more final plats) then the City will assume the remainder of the PUD will build out as proposed by the developer and approved by the Hearing Examiner (for PUDs) and City Council (for zoning overlays). Accordingly, land within vested PUDs is not generally included in the following land charts and tables. More information on the capacity represented by the City's more than 130 PUDs is included in **Section XIII** of this report.

While Preliminary Plats may provide additional information as to the expected future development capacity of a given area, the analysis presented herein does not utilize preliminary platting. Instead, the assumptions in the overall LCA are utilized in these areas.

Classification Results: Vacant, Partially Used, and Underutilized

Following multiple reviews and error-checking, City staff classified over 8,900 parcels as either vacant, partially used, or underutilized. Those parcels, and their gross area, are outlined in **Figure 7** on the following page.

Note that the areas described in **Figure 7** are indicative of the *entire* parcel area. Not included are existing rights-of-way and other features outside traditional fee-simple parcels. Also, the City has not included public lands such as parks properties, transmission line corridors, transportation parcels (i.e. railroads, airport land, etc.), but features such as steep slopes, wetlands, and unstable soils are still included in the total area listed above. They were subtracted in Step 2, outlined later in this report.

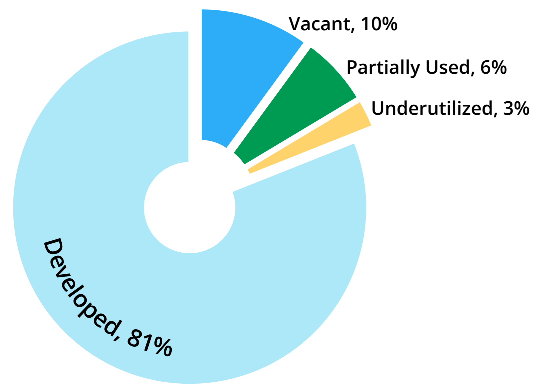
Figure 7: Summary of Classified Parcels in the City of Spokane and their Proportion to the Whole

Classification[1]	Parcels (Count)	Area[2] (Size)
Vacant	3,681	3,521.4
Partially Used	736	2,230.3
Underutilized	4,503	899.5
Developed	72,042	28,429.4

Source: *City of Spokane, LCA Analysis, 2024*

Notes: *1. Some parcels in the vacant, partially used, or underutilized classification may represent zero residential capacity due to site conditions or other limiting factors.*

2. Area denotes the net parcel area, regardless of site conditions or pre-existing development.



Because this analysis must ultimately apply an assumed residential density to these classified parcels to determine the population they might hold, staff has grouped these classified parcels into "density groups." These are groups of various zoning districts that provide similar residential development potential. For reference, those groups are:

- Residential Low: RA, R1, and R2 zones
- Residential High: RMF and RHD zones
- Commercial/Office/CC: CC1, CC2, CC3, CC4, CB, CA1, CA2, CA3, CA4, GC, NR, O, and OR zones
- Downtown: DTC, DTG, DTU, DTS zones
- Industrial: LI & HI

According to the City of Spokane Comprehensive Plan, and the resulting standards of the zoning code (SMC Title 17C), all zones allow for residential development, except for industrial zones. Furthermore, the City's current growth strategy identifies several Centers and Corridors where growth is focused. Accordingly, those groups are enumerated separately.

For a complete summary of the various classifications of lands (outside PUDs) and their zoning groups, see **Figure 8** on the following page.

VI. LCA Step 2: Subtract Physically Unbuildable Lands

The second step in the methodology involves removing from the classified parcels any areas that are "not developable because of physical limitations." These include steep slopes (those over 30 percent grade), unstable soils, wetlands and surface waters, and any other areas precluded from development by local, state, or federal policies or laws. In the case of wetlands and other jurisdictional areas, not only was the surface feature removed from the parcel area but so were the required buffers from those features. The distance those buffers represent was informed directly by the SMC and other applicable regulations.

Figure 8: Classified Parcels by Density Group (Outside PUDs and South Logan)

	Residential Low		Residential High		Comm/Office/CC	
Classification	**Parcels**	**Acres**	**Parcels**	**Acres**	**Parcels**	**Acres**
Vacant	1,738	1,469.2	275	195.3	659	388.9
Partially Used	492	1,204.9	23	164.9	82	398.0
Underutilized	19	59.3	2,266	362.0	1,167	240.1

	Downtown		Industrial	
Classification	**Parcels**	**Acres**	**Parcels**	**Acres**
Vacant	94	28.7	392	732.7
Partially Used	32	49.9	89	316.0
Underutilized	192	44.0	268	86.1

***Source**: City of Spokane, LCA Analysis, 2024*

***Notes**: In the case of split zoned parcels, preference was given to the amount of residential zoned land. Note that industrial areas are included here for informational purposes, but for the LCA these areas are not considered to provide residential capacity.*

The areas removed from the classified parcels included the following:

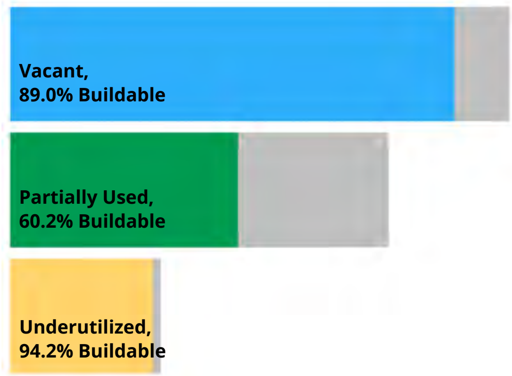
- Wetlands and their buffers, as provided by U.S. Department of the Interior, Fish and Wildlife Service, Washington.
- Steep slopes and unstable soils, as mapped by the City of Spokane GIS department. Steep slopes were generated by 2015 LIDAR data provided by the U.S. Department of the Interior. Unstable soils generated according to the Soil survey data, also provided by the U.S. Department of the Interior. Known rock outcroppings and site boulders mapped by City GIS staff.
- The Spokane River, Latah Creek, and all other jurisdictional waters up to the ordinary high water mark, as determined by orthographic photography by the City of Spokane, 2022.
- Shoreline Jurisdictional Areas mapped according to SMC 17E.060 that preclude development.
- Other small areas of known natural/cultural resources and other physical impediments to development, manually mapped by City staff during the analysis.

The area of these features within each parcel were quantified by GIS software. Additionally, City staff measured the area of each existing development on partially used parcels. For instance, if a home exists on the parcel City staff measured the footprint of the home, any hardscape or landscape, and outbuildings like garages to build into the assumptions that the existing home/structure would remain.

All of the various areas identified above were quantified for each classified parcel and then added to develop an "unbuildable acres" for each parcel. This was done mathematically and did not require any additional manipulation by City staff. By subtracting the unbuildable acres from the overall size of the parcel, a theoretical "buildable acres" was calculated for each parcel as well. The results are shown in **Figure 9** below.

Figure 9: Buildable Acres by Classification (Outside PUDs and South Logan)

Classification	Gross Acres	Buildable Acres	Percent Unbuildable
Vacant	2,814.7	2,503.7	11.0%
Partially Used	2,133.8	1,284.7	39.8%
Underutilized	791.6	745.5	5.8%
TOTAL	**5,740.1**	**4,533.8**	**21.0%**



Source: *City of Spokane, LCA Analysis, 2024*

Notes: *Buildable acres are those wherein there exist no physical features that would preclude future development, such as steep slopes, unstable soils, wetlands, etc. Some quantification of these features was made manually by City staff according to local conditions.*

In the case of partially used and underutilized parcels, some special considerations are included in the table above and the completion of this step in the process. See the following section for details.

VII. Applied Special Considerations

During regional discussions with decision makers and stakeholders, some concerns were raised that Partially Used and Underutilized lands may experience a greater degree of moderating market forces that will reduce overall capacity. These two areas are handled specially, as described below.

Special Consideration for Partially Used Capacity

Regarding those properties classified as "partially used," a simple accounting of buildable acres multiplied by the assumed density may overstate the capacity represented by the parcel. The simple presence of a pre-existing use on the property may have a moderating effect on future development potential for that parcel. While investigations have been made to find a factor or factors that would indicate the degree to which a partially used parcel might redevelop in the planning horizon, the City was unable to find a conclusive correlation between any of the known parcel data and the likelihood of redevelopment.

With that in mind, selection of partially used parcels in the city and calculation of the resulting buildable area of each parcel factored in the existing use to the maximum extent possible. Where a home exists on a partially used parcel, for example, staff withdrew the area of the home and a reasonable-sized yard from the overall buildable acreage. Accordingly, a 1-acre parcel with a single home and no other impediments to development was reduced in buildable area by as much as 25 percent to account for the existing home and its yard(s). This was possible given both existing parcel data and the City's detailed surveys of building footprints. Ultimately, this is part of why the amount of unbuildable land in Figure 9 is larger for partially used parcels.

Special Consideration for Underutilized Capacity

Underutilized parcels are a special case, in that they not only contain pre-existing development as partially used parcels do, but existing development likely occupies the entire parcel. The factors involved in completely redeveloping an existing, operating parcel are many and complex. To this end, the LCA methodology[6] suggests that jurisdictions should select for those parcels where the improvement value is four times or less the value of the land as having a higher likelihood of redevelopment. For the final capacity count outside of PUDs, City staff has limited the underutilized parcels that provided unit counts to only those whose improvement value is less than or equal to four times the land value.

VIII. LCA Step 3: Subtract Lands Needed for Other Purposes

After removing physical impediments to development, the adopted methodology allows for the removal of any lands "needed for other public purposes." In general, this indicates lands needed for utility corridors, landfills, sewage treatment plants, recreation facilities, schools, and other public uses. These uses need not be existing ones—planned and future facilities should be accommodated as well.

To remove these lands from the capacity calculation, City staff used the City's existing inventory of City property, which included Parks and Recreation lands. To this, staff added facilities owned by the following entities (as determined by parcel data):

- School Districts (all three whose boundaries include the city);
- Avista Corporation;
- Gonzaga University[7];
- Burlington Northern / Santa Fe Railroad (and all derivatives);
- State of Washington;
- Spokane Airports;
- Washington Department of Transportation;
- Washington Department of Natural Resources;
- Washington Department of Fish & Wildlife;
- United States Government (and all departments);
- Other known governmental agencies and non-governmental organizations whose mission does not include the provision of housing.

Every parcel that was identified through this step was manually adjusted to subtract them from the vacant, partially used, or underutilized categories. Accordingly, they have already been discounted from the numbers presented in Figures 4, 5, and 6 above and no adjustment of those numbers is necessary.

[6] *Adopted by the Spokane Board of County Commissioners and appended to the Countywide Planning Policies.*

[7] This was limited to those Gonzaga properties with a Land Use Plan Map designation in the Comprehensive Plan of "institutional," as areas outside this owned by Gonzaga has, in the past, included development of traditional multi-unit apartments.

A Note on Rights-of-Way and Common Lands Within Large Lots

Large lot development is often distinct from smaller developments because a percentage of capacity is lost to the provision of internal roadways, public spaces, sidewalks, trails, and other appurtenances to planned communities. Outside of existing PUDs, this area must be considered because land used for roads and sidewalks naturally cannot be used to construct housing units. To that end, the LCA methodology allows jurisdictions to subtract a percentage of the available land—an amount to be determined by each jurisdiction.

In the case of the City of Spokane, the same assumption used in the prior two LCA analyses (2015 and 2008) was utilized, wherein 15 percent of large lot areas was subtracted from the total. To do this, staff separated out by size those parcels where internal roadways are unlikely. So called 'small lots' were those of no more than two acres, commensurate with SMC development standards wherein parcels of 2 acres or less are not subject to a density limitations (see SMC 17C.111.205). For any parcels greater than 2 acres in size, staff reduced the buildable acres by 15 percent to account for internal losses due to roadways, playgrounds, trash enclosures, etc.

All of the various areas identified above were quantified for each classified parcel and then added to develop an "unbuildable acres" for each parcel. This was done mathematically and did not require any additional manipulation by City staff. By subtracting the unbuildable acres from the overall size of the parcel, a theoretical "buildable acres" was calculated for each parcel as well. The results are shown in **Figure 9** above.

In addition to the parcels removed from capacity consideration in previous steps, after Step 3 was complete about 10 percent of remaining vacant parcels were found to be unbuildable, while nearly 40 percent of partially used parcels were unbuildable. This was due in part to the assumption that the existing development on partially used parcels would remain if development of the undeveloped portion of the parcel were later developed. Lastly, only about 5 percent of underutilized parcels was found to be unbuildable.

IX. LCA Step 4: Market Factor and the Unknown

In any such exercise like the LCA, the scale of analysis is such that it is impossible to know every individual factor that comes into play when determining whether a given parcel will develop and, if so, how much residential capacity it will accommodate. To factor this into the analysis, GMA provides for the use of a market factor, a mathematical reduction in overall capacity intending to quantify all the unknown factors involved. These unknown and unquantified factors include:

- Market conditions over 20 years;
- Willingness and interest of individual property owners to sell/develop/subdivide their property;

- The speed at which development may occur even in cases where it is desired by the property owner;
- The effect of property speculation and long-term holdings;
- The availability of financing/insurance/etc.; and,
- The capacity of the local construction industry to respond to changing demand.

Where, thus far, the methodology has attempted to quantify the physical availability of certain lands for future development, market factor is included to account for the effect of development likelihood and owner/developer willingness. It is an adjustment taken from the total to account for the myriad unknown factors that play on likely development.

Despite much debate at the regional and jurisdictional level, as well as multiple studies by the Washington Department of Commerce and others seeking to determine a market factor to apply, all attempts have generally found that there is no one simple value that is most realistic or effective. To that end, Spokane County and the various jurisdictions returned to the same value within the UGA as the last LCA process, that of a 30 percent reduction overall.

Market factor is, in essence, an attempt to quantify the unknowable. To this end, it cannot be accurately applied on a site-by-site basis. As a result, the regionally adopted methodology envisions this factor being applied at the end of the process, as an off-the-top adjustment of the overall capacity. As a result, the City has reduced the overall unit capacity by 30 percent overall, regardless of location or site condition. See Section XI below for an accounting of the effects of Market Factor on City of Spokane housing capacity.

X. LCA Step 5: Determine Capacity via Assumed Densities

Once it's clear how many acres of buildable land are available, the City must apply a range of density assumptions to that land to calculate a theoretical dwelling unit capacity in the City. The development density (units per acre) is not the same across all zones and locations throughout the City. Thus, a range of density assumptions has been developed that allows the City to make a nuanced, realistic calculation of potential dwelling unit capacity represented by any given parcel in the City.

In summary, the density assumptions listed in **Figure 10** on the following page have been applied to the classified lands to determine the number of units likely to be developed in 20 years. For more details on these assumptions and how they were determined, see Appendix A at the end of this report. Some additional considerations are discussed below as well.

Low Intensity Residential

Unlike the other density groups, assumptions for density in low-intensity zones areas differ depending on location within the City. This is due to existing development features

Figure 10: Density Assumptions for LCA Calculation by Zone Type

Density Group / Class	Assumed Density	Source
Low-Intensity Residential (Zone RA, R1 & R2)	5-9 units/acre depending on location[1]	Interpolated existing density by survey section
High-Intensity Residential (Zone RMF & RHD)	29 units/acre	Analysis of multi-unit permits since 2019
Accessory Dwelling Units (ADU)	600 ADUs over 20 years, regardless of location	Permit history since 2008
Downtown (Zone DTU, DTC, DTG, DTS)	44.4 units/acre, applied to 33% of zone	Analysis of non-residential zone development since 2022
Non-Residential Zones (Zone NR, GC, CB, O, OR)	30.2 units/acre, applied to 33% of zone	Analysis of non-residential zone development since 2022

Source: *City of Spokane (2025) LCA 2025: Proposed Residential Density Assumptions.* **Appendix A** *to this report.*
Notes: *1. See Figure 9 for the specific locations where different low-intensity residential densities are to be applied.*

within those areas, wherein residential density has historically differed. Generally higher density is found nearer the city's core and density decreases as the distance to the river and downtown grows. Accordingly, the density assumptions applied in this analysis conform to those shown in **Figure 11** on the following page. Note that the only applies to low-intensity residential zones *outside* of PUDs.

Effects of Recent Housing Changes (BOCA/BOH)

As outlined in the density analysis in Appendix A of this report, the City has not assumed any direct impact of the Building Opportunity and Choices for All (BOCA)[8] and Building Opportunity for Housing (BOH)[9] ordinances on low-intensity residential density assumptions. That isn't to say that the BOCA/BOH ordinances have no effect, or that they have "failed" as has been asserted by some. Rather, these changes are simply too recent to have provided sufficient statistical data to project such a long time into the future (20 years). Accordingly, this analysis does not provide for a direct bonus to residential development as a result of BOCA/BOH.

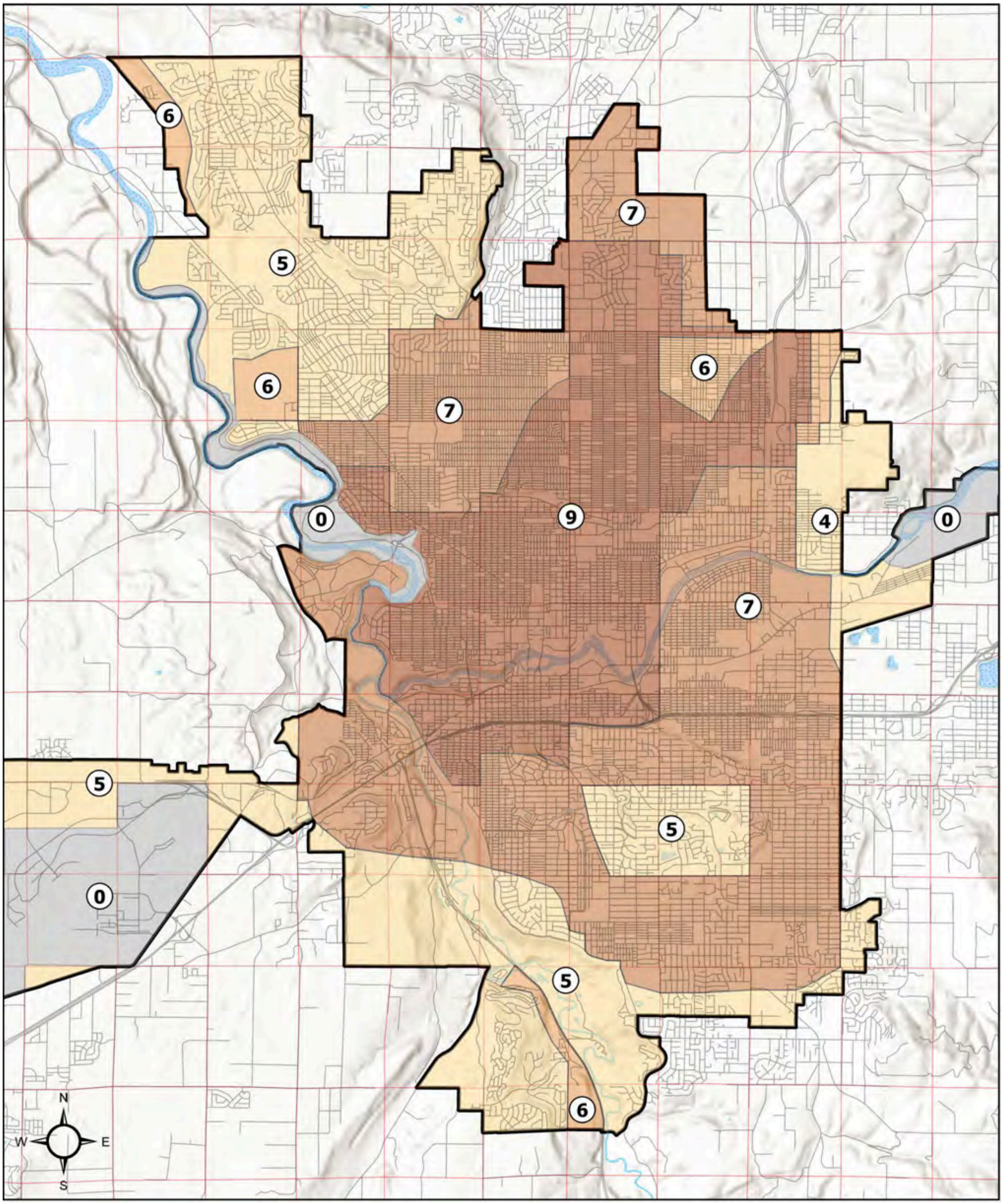
The City will continue to track these ordinances and their effects and consider what data is available at the five-year progress check required by GMA. At that time, it should be clearer what level of impact these (and other) recent ordinances have had on the development environment in Spokane.

A Note on Accessory Dwelling Units

Contrasting BOCA/BOH data, the City has significant data on recent changes to ADU standards and the resulting development demand to apply those data to expected ADU development. However, unlike more traditional housing unit development, ADU potential

[8] Ordinance C36232, Adopted July 18, 2022
[9] Ordinance C36459, Adopted November 20, 2023

Figure 11: Low-Intensity Residential Density Assumptions by Location (Units/Acre)



Source*: City of Spokane (2025) LCA 2025: Proposed Residential Density Assumptions. Appendix A to this report.*

Notes*: The number indicated represents the assumed low-intensity residential density (units/acre) to be applied in that area. These assumptions are applied only to low-intensity residential parcels (zoned R1 or R2) and only outside of Planned Unit Developments.*

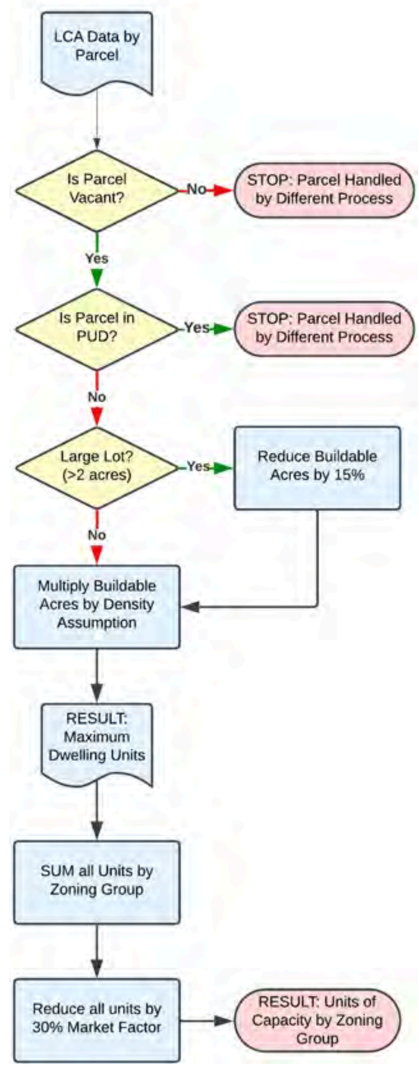
is equally split in the city among new development on vacant parcels and that seen in previously developed areas. In other words, the potential for an ADU to be developed seems to be equal among vacant and developed parcels in the City. To this end, the assumption is that ADU development will follow along recent levels citywide–approximately 30 per year, regardless of location. Accordingly, this LCA assumes 600 ADU units throughout the planning horizon and will not attempt to locate those geographically in the City.

As with BOCA/BOH effects on housing development, staff recommends that ADU development continue to be tracked over time to discern if the amount per year is changing. With more data, the ADU assumptions in the five-year review of development required by GMA may be amended in 2031.

Process for Applying Density to Classified Land

Rather than take the total land in each density group and apply the assumption universally, the City attempted to further refine the results by addressing each parcel individually. The basic process taken with each parcel was applied mathematically and did not require direct attention for each of the classified parcels. GIS tools were used to follow an ordered process that selected for the proper parcels, applied the correct assumptions, and determined the likely unit carrying capacity of each parcel individually. The process followed conforms to flow depicted in **Figure 12** at right.

Figure 12: Unit Calculation Flow–Vacant Parcels Only



Essentially, maximum units were determined for each parcel based on its acres of buildable land (gross acreage minus all factors that affect development from steps 2 and 3 above), multiplied by the appropriate density assumption from **Figure 10**. By doing this, the City informed the units any given parcel could contain by local conditions, but also used globally applied factors to ensure that a conservative assumption of capacity is achieved. Once a potential number of units was determined for each parcel, those units were added together by zoning group and then reduced by the 30 percent market factor. Thus, individual parcel characteristics played a part in capacity up *until* the market factor, which is itself not geographically linked.

By applying the density assumptions in **Figure 10** to the land classifications, the City found a maximum theoretical residential capacity in the city (before market factor is applied) of approximately 36,500 units. Now that a theoretical maximum capacity was calculated, it only remained to remove the 30 percent market factor to find the total capacity for each density group. Once the 30 percent market factor was subtracted, the capacity shown in **Figure 13** on the following page resulted.

Figure 13: Unit Capacity by Classification and Density Group (Outside PUDs and South Logan)

Classification	Low-Intensity Residential			High-Intensity Residential		
	Parcels	Max Units[1]	Units of Capacity[2]	Parcels	Max Units[1]	Units of Capacity[2]
Vacant	1,738	7,038	4,927	275	4,629	3,240
Partially Used	492	4,364	3,055	23	2,239	1,567
Underutilized	19	210	147	2,266	7,234	5,064
	Commercial/Office/CC			**Downtown**		
	Parcels	Max Units[1]	Units of Capacity[2]	Parcels	Max Units[1]	Units of Capacity[2]
Vacant	659	2,758	1,931	94	351	246
Partially Used	82	570	399	32	355	249
Underutilized	1,167	1,890	1,323	192	647	453
	TOTAL[3]					
	Parcels	Max Units[1]	Units of Capacity[2]			
Vacant	**2,766**	**14,777**	**10,344**			
Partially Used	**629**	**7,528**	**5,270**			
Underutilized	**3,644**	**9,981**	**6,987**			

Source: City of Spokane, LCA Analysis, 2024

Notes: High Industrial properties represent zero residential capacity in the city, thus they are not included in this table.

*1. Max Units represent the total buildable area multiplied by the density assumptions for that group, as described in **Figure 9**.*

2. Units of Capacity is equal to Max Units reduced by the 30 percent Market Factor.

3. TOTAL numbers represent the sum of all density groups.

XI. Converting Units to Population

The adopted LCA Methodology is general in describing the method jurisdictions should utilize to convert units to population. There are many factors that can play into such a conversion–some of which vary greatly from jurisdiction to jurisdiction. Additionally, thee factors change over time–necessitating some adjustment for the 20-year time frame of the LCA.

Perhaps the greatest single factor involved in converting housing units to population is average people per household–the average number of people living in a particular unit. Simply put, if households are larger, more people can be expected from a given number of housing units. Conversely, if household sizes are small, fewer people will be housed in the same number of housing units. To that end, staff undertook an exploration of various characteristics of household size as reported by the U.S. Census Bureau as well as the Washington Office of Financial Management (OFM).

The Washington Department Commerce ('Commerce') has contracted with BERK Consulting to prepare various tools and models for forecasting housing need in the state, commensurate with the requirements of HB 1220 (2021). The efforts of Commerce and BERK have indicated that average household size in Spokane County may fall as much as seven percent by 2046, falling from an average of 2.46 in 2020 to only 2.29 in 2046. Conversely, a linear trend created from American Communities Survey (ACS) 5-year data estimates for the City of Spokane show a *rise* from 2.28 in 2020 to 2.31 in 2046. Finally, OFM provides a year-by-year estimate of persons per household in the City of Spokane. OFM's current data show that people per household in Spokane has grown slightly over time, from 2.28 in 1992 to 2.33 in 2024.

There are clear variations between different data sets, though they are generally close. However, each data set explored above provides for a single household size, which ignores the fact that household sizes are different for different housing types. Only OFM data sets provided sufficient detail to discern differences in various housing types. OFM data has the added benefit of conforming to data used to form the countywide and various jurisdictions' population growth targets, adopted by BOCC earlier in 2024.

Via OFM's program for estimating population for each jurisdiction annually, OFM provided the number of occupied units and population living in various housing types for the City of Spokane. Housing types matched those reported each year by the City, including 1, 2, 3&4, and 5+ unit buildings. For each, OFM provides the total population in that housing type as well as the number occupied units. OFM reported these data points for each year since 1990.

A further complication occurs because the City provides for multiple housing types in various zones, making it difficult to parse household size to each zoning group. In other words, applying a 1-unit household size to all of a zoning group might under- or overstate the actual capacity that zoning group represents. To account for this, staff has combined the household size for 1, 2, and 3/4 unit buildings into a "middle housing" household size and will use the 5+ unit household size to represent "multi-unit housing" in the City.

Accordingly, the household sizes shown in **Figure 14** below will be used when calculating population capacity from unit capacity, namely 2.63 people per unit for middle housing and 1.60 people per household for middle housing. This is only slightly elevated from the numbers used in the last round of the LCA in 2015, when the City assumed 2.5 people per household in single- and two-family zones and 1.6 in multi-family zones.

Figure 14: Household Size Trend Analysis for Middle Housing and Multi-Unit

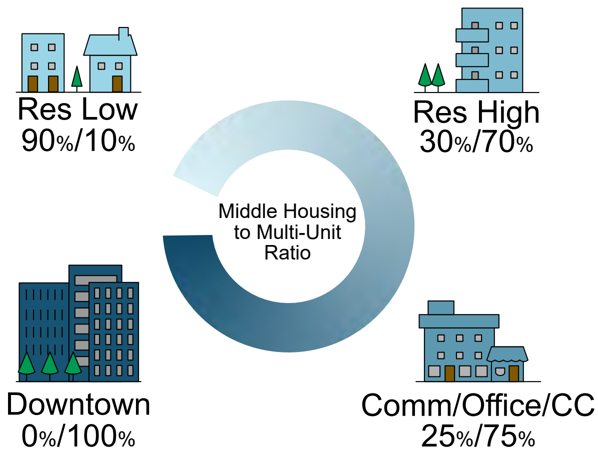
Housing Type	1990	2024	2046
Middle Housing (1-4 units)	2.50	2.59	2.63
Multi-Unit (5+ units)	1.46	1.59	1.60

***Source**: WA Office of Financial Management, POP_HU_PERM_2024 table, Components of Housing Unit Change Extract.*

***Notes**: 2046 assumption represents a linear trend created from 1992 to 2024 data for the City of Spokane.*

Further refinement of the resulting population capacity is possible when considering that not all of a particular zoning group will develop with one type or the other. Middle housing types are often constructed on smaller lots in higher intensity zones like commercial/office or centers and corridors. Middle housing, per the City's comprehensive plan, is appropriate everywhere housing is permitted and can integrate well into all types of neighborhoods. Accordingly, it is accurate to accommodate for some percentage of middle housing in each zoning group, save for perhaps downtown zones where middle housing development is much less likely. Accordingly, the analysis here assumes differing

Figure 15: Assumed Ratio of Middle Housing to Multi-Unit in Each Density Group



***Notes**: Indicated ratio is "middle housing" to "multi-unit". Middle housing denotes 1 to 4 units per structure. Multi-unit denotes 5 or more units per structure.*

proportions of middle housing to multi-unit development in each zoning group, as shown in **Figure 15** at left. This adjustment will be made mathematically rather than geographically, by applying the two household size assumptions to the proper percentage of all vacant/partially used/underutilized land in those density groups. For instance, the analysis assumes that 90 percent of the vacant land capacity in the residential low zoning group will develop at 2.63 people per unit while 10 percent will develop at 1.60 people per unit.

In essence, for each density group the units of capacity were divided by the ratio in the figure above, multiplied by the persons per household assumption for that housing type, and then added together to find a total number of people each zoning group can accommodate. The results of this analysis are shown in **Figure 16** on the following page, providing the total population capacity for each zoning group, classified by whether that capacity comes from vacant land, partially used land, or underutilized land. As with everything in this section, the following table does not include the capacity represented by the various PUDs in the City. Those will be discussed in a following section.

Figure 16: Unit and Population Capacity by Density Group (Outside PUDs and South Logan)

	Low-Intensity Residential		**High-Intensity Residential**	
Classification	**Units**	**Population**	**Units**	**Population**
Vacant	4,927	12,450	3,240	6,186
Partially Used	3,055	7,719	1,567	2,992
Underutilized	147	371	5,064	9,667
	Comm/Office/CC		**Downtown**	
	Units	**Population**	**Units**	**Population**
Vacant	1,931	3,587	246	393
Partially Used	399	741	249	398
Underutilized	1,323	2,457	453	725
	TOTAL			
	Units	**Population**		
Vacant	**10,344**	**22,615**		
Partially Used	**5,270**	**11,850**		
Underutilized	**6,987**	**13,220**		

***Source**: City of Spokane, LCA Analysis, 2024*

***Notes**: Market Factor has been applied to these quantities, as well as commonsense, real-world factors that would potentially affect development capacity, as allowed in the adopted LCA Methodology and documented in this report. Interpolation of this data into smaller geographic areas (e.g. neighborhoods) could introduce significant errors into the results.*

As shown in **Figure 16** on the following page, the City currently contains sufficient capacity within lands classified as vacant for nearly 23,000 people. Lands classified as partially used contain sufficient capacity for almost 12,000 more and underutilized lands could accommodate a further 20,000. Most of the city's overall capacity exists in low-intensity and high-intensity residential zones, though capacity exists in some part in all density groups.

It is important to note that while the City has classified lands in all three categories, the available capacity in vacant lands, not counting PUDs, is nearly sufficient to meet the City's 2046 population allocation of 23,357 additional people. Considering all three categories of land, the City contains sufficient land for more than 2.3 times the city's growth allocation.

XII. Capacity in Planned Unit Developments

The calculations provided above do not include the capacity that exists within PUDs in the city. The City has approved more than 100 such PUDs within the City limits, some having been approved quite recently and others have continued to develop since the 1980s. Many of the PUDs approved by the City have completed construction and thus represent no additional residential capacity. However, 17 PUDs contain vacant lands sufficient for additional development.

Residential capacity in PUDs fall into one of two categories:

- Platted Vacant Lots: Many PUDs contain lots that have been fully platted but construction of a home or homes has not begun.
- Tracts and Large Lots: PUDs can also contain large areas that will, according to the preliminary plat or PUD approvals, be platted into individual lots at a later date. Additionally, some PUDs contain large lots that will eventually contain multi-unit developments.

The City has completed a multi-year review of every active PUD in the city in order to determine how much development each was approved for, how much has occurred since, and the remaining development that will occur as the PUD continues to develop. This information was determined by direct review of approval documents–primarily Hearing Examiner decisions–and other sources in the official record. For those PUDs that have changed over time, either through additional approvals or during the final platting process, adjustments in the expected development for each has been made.

Regarding platted vacant lots, these lots are assumed to develop as proposed when platted. Virtually all of these are single-unit lots, thus this analysis assumes a single unit will be placed upon each. In the case of multi-unit tracts, the remaining number of multi-unit dwellings approved by the Hearing Examiner/Planning Director are assumed.

Regarding large lots and tracts, City staff has undertaken a review of each PUD's available documentation to determine how many lots are expected to be platted in these locations. For single-unit lots, only a single unit is assumed by this analysis (no ADUs, duplexes, etc.). For multi-unit lots, again deference was given to the original Plat or PUD approval. Following this document review and analysis of each individual lot by City staff, the City has determined the capacity represented by the PUDs is as shown in **Figure 17** below.

Figure 17: Planned Unit Development Capacity by Platted and Unplatted Status

Classification	Parcels (Count)	Area (Acres)	Units	Population
Platted Lots	290	90.8	337	843
Unplatted Single-Unit	-	-	1,418	3,545
Unplatted Multi-Unit	-	-	2,808	4,493
TOTAL			**4,563**	**8,880**

***Source**: City of Spokane, LCA Analysis, 2024*

***Notes**: Data in this table is directly sourced from City records and archives for each PUD in the city.*

A significant amount of housing capacity resides within the City's PUDs. However, these areas also tend to represent a limitation on the requirements of House Bill 1110 (2023) and other similar legislation. The state legislature has not passed any regulation that would vacate the numerous covenants and restrictions already placed on properties preventing the development of middle housing like duplexes and ADUs. Because of this, and as a conservative limitation on the capacity of PUDs, the unit counts in **Figure 17** assume that only single-unit homes will be built on single lots.

Multi-unit development is listed in the table, but only in cases where (1) the approval of the PUD specifically lists multi-unit development as a component of the PUD and (2) the remaining undeveloped tracts are sufficient for such development (size, characteristics, etc.). The first condition filters out PUDs where multi-unit development is not specifically approved and the second allows the analysis to weed out PUDs where a multi-unit component was originally approved but subsequent development of the PUD has left the site with little land for such uses. This second situation is common for some long-lasting PUDs, where market forces and the discretion of the property owner/developer has resulted in larger than expected single-unit lots or some areas given over to public use rather than home development. In any case, every attempt has been made to account for real-world limitations on future development.

XIII. Capacity in the South Logan TOD Study

The City of Spokane has been analyzing and considering Transit-Oriented Development (TOD) for several years via multiple avenues. The latest effort on this front included a detailed analysis and various code, zoning, and land use changes around the South Logan Subarea, centered along the Spokane Transit Authority's City Line and encompassing much of the Logan neighborhood around Gonzaga University and the

Hamilton Street corridor. Throughout 2023 the City prepared a major analysis known as the South Logan TOD Study.

As part of the preparation of the South Logan TOD Study, the City prepared and adopted an Environmental Impact Statement (EIS) under the State Environmental Protection Act (SEPA). The Draft EIS considered the impacts of multiple growth alternatives, which included varying recommendations and actions the City might undertake to support TOD within the study area. The Final EIS was based on the Preferred Alternative, a combination of recommendations and actions from the various draft alternatives, around which the South Logan TOD Study was framed. The analysis within the Final EIS determined the expected number of dwelling units and population that would be accommodated by growth within the study area, provided the recommendations of the South Logan TOD Study were adopted by the City.

On January 29, 2024, a City Council Resolution was passed which adopted the South Logan TOD Study and Final EIS[10]. Following this adoption, City Council adopted multiple actions called for in the study, including citywide and area-specific amendments to the SMC, a Planned Action Ordinance of the South Logan Subarea, and a range of zoning and land use changes throughout the study area. The City subsequently adopted the Planned Action Ordinance[11] in August 2024. The land use and zoning changes were adopted by ordinance[12] in December 2024.

Because the Final EIS provided a much higher level of specificity and accuracy as to the growth capacity of the study area, greater than the generalized methodology in the LCA could, and because the recommendations of the South Logan TOD Study have now been adopted by the City, the conclusions of the EIS will be relied on when describing the growth capacity in this area.

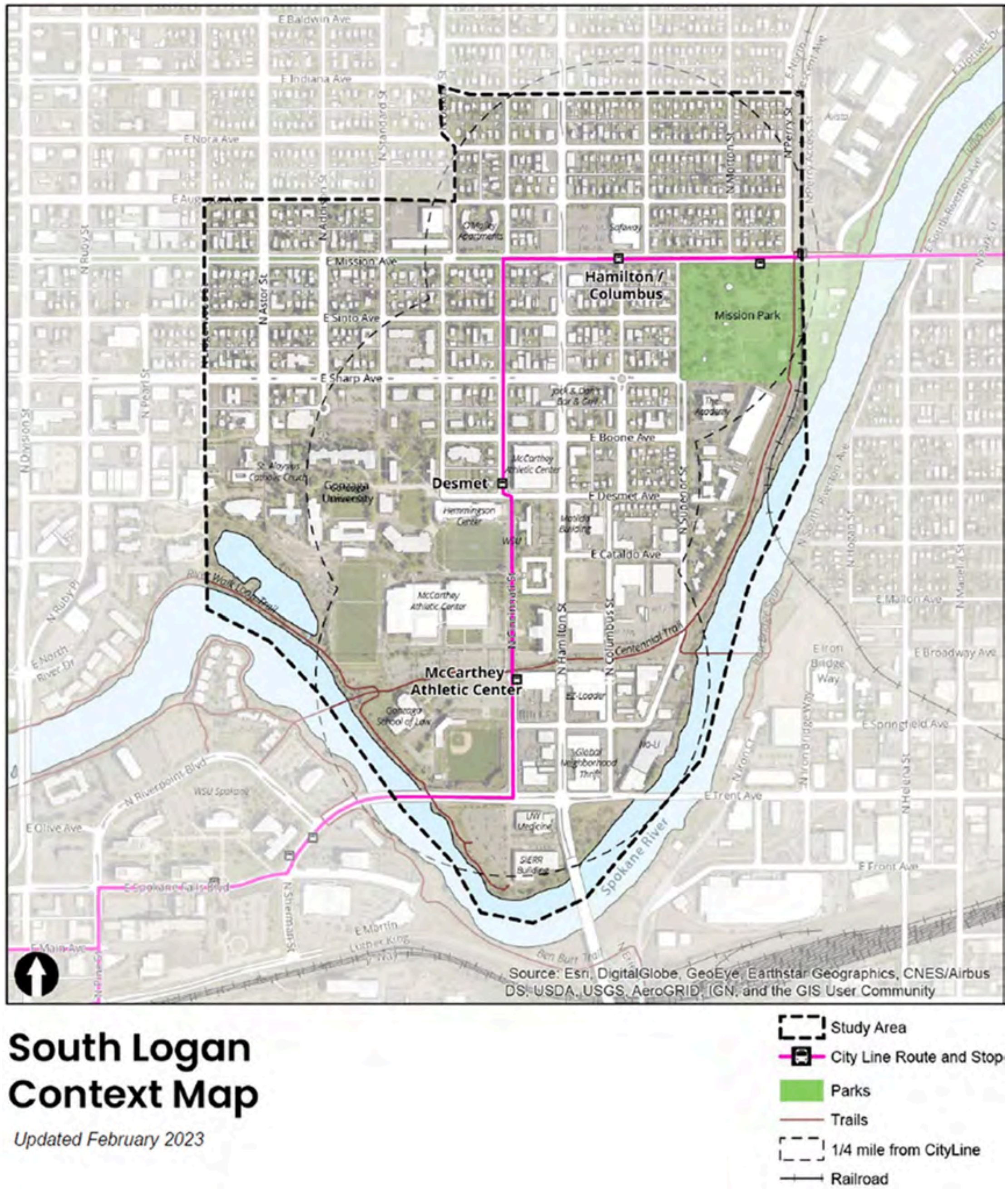
The South Logan TOD Study Area is shown on the following page in **Figure 18**. All parcels within this area have been pulled from the discussion of capacity in the previous sections of this report, thus they are not included in the tables above and are enumerated separately here. When considering the ultimate development capacity of the South Logan TOD Study Area, the EIS identified the dwelling unit and population capacity shown in **Figure 19**, also on the following page.

XIV. Additional Capacity Potential: Downtown Surface Parking

Downtown Spokane serves not only as the center of the City but also of the region. The City's development strategy for many years has been to support and enhance the Downtown development environment. For nearly as long as Spokane has been a city, the downtown has been where development, density, and mixed uses have been focused. Accordingly, the City's current development strategy identifies the downtown as the

[10] TOD Study and EIS adopted by City Council Resolution RES 2024-0015 on January 29, 2024.
[11] Planned Action Ordinance adopted by City Ordinance C36554 on August 12, 2024.
[12] Land Use and Zoning changes adopted December 2, 2024 by City Ordinance C36614

Figure 18: South Logan TOD Study Area and Major Features



Source: City of Spokane (2023, November). South Logan TOD Final Environmental Impact Statement. ***Figure 1****, p. 13.*

Figure 19: South Logan TOD Final EIS Capacity

Classification	New Unit Capacity	New Population Capacity
Adopted Code/Map Amendments	2,954	6,735

Source*: City of Spokane, South Logan TOD Final Environmental Impact Analysis. Retrieved online from https://my.spokanecity.org/projects/south-logan-transit-oriented-development-project/*

Regional Center where development standards allow for the highest structures and the greatest range of potential uses anywhere in the City. Over time, many of the historic downtown structures have been demolished, only to be replaced by surface parking lots. As the City's development strategy calls for the highest densities and most intense residential, commercial, and office uses to be in the City's Regional Center, the presence of numerous surface parking lots points to a potentially untapped opportunity.

The City has adopted three Downtown Plans since the original adoption of the current Comprehensive Plan in 2001. All three Downtown Plans, themselves a part of the overall Comprehensive Plan, have identified surface-level parking lots as a major issue downtown. The City went so far in 2009 as to adopt a new Downtown section in the SMC which, in part, prohibited the placement of any new surface lots in the downtown core[13]. Most recently, the City adopted the "Pavement to People: A Downtown Housing Incentive" Ordinance that seeks to incentivize redevelopment of surface lots downtown into housing[14]. This program waives sales and use tax on new construction on any surface parking lots downtown.

In summary, it is a well-established idea that surface lots in the City's downtown represent significant potential development capacity. As described above, and expanded upon in Appendix A to this report, the City expects up to one-third of development downtown to be residential in nature. Accordingly, if surface lots downtown were to redevelop to some degree, a similar proportion of residential capacity could result. However, surface lots with significant improvements upon them (lighting, paving, curbs, kiosks, etc.) may not have been classified as either vacant, partially-used, or underutilized per the adopted LCA methodology.

In an effort to determine how much capacity may be untapped downtown, City staff undertook a detailed analysis of downtown properties and some areas adjacent to the downtown where it is commonly understood that downtown-like growth might be appropriate (e.g. the north bank and the lower south hill or 'medical district'). Staff took advantage of recently taken aerial photography to determine where surface lots can be found downtown and then augmented that information via recent permit data for demolitions and construction.

Each surface parking lot was identified in the study area following which staff used geo-analysis tools to determine the acres of parking lot on each parcel. In many cases, the entire parcel was taken up by surface parking, but staff also identified and quantified surface lots that took up only a portion of the parcel. The result was a table of surprising scale, encompassing 1,223 parcels downtown that contained at least some surface parking. As there currently exist 2,730 parcels in the study area, more than 44 percent of downtown parcels contain surface parking. Of those, 459 parcels were entirely taken up with surface parking lots, providing no other use or capacity to the city. Accordingly, surface parking lots in downtown Spokane may be taking a significant amount of

[13] Adoption of SMC 17C.124 Downtown Zones by Spokane Ordinance C34522, adopted December 14, 2009.

[14] Adoption of SMC 08.07D by Spokane Ordinance C36357, adopted February 27, 2023.

residential capacity away from the City.

An important factor, however, is that some of these parcels have already been classified in the LCA process, described earlier in this report, and shouldn't be double counted here. Of the 1,223 parcels identified by this analysis, 434 were already classified as either vacant, partially used, or underutilized in the LCA analysis. Thus, these 434 parcels have already been accounted some amount of residential development capacity and should not be counted here. That leaves 789 parcels, wholly or in part, that could provide additional residential capacity downtown if redeveloped.

For those additional 789 parcels, potential residential capacity can be found in varying amounts, provided those surface lots were to redevelop. **Figure 20** below summarizes the characteristics of those 789 parcels, including their area and whether they contain only surface parking or some other use. To this area, the same assumptions used for downtown parcels within the LCA were applied to determine a theoretical capacity in both units and population for those parcels. These assumptions included the following: (1) only one-third of new downtown projects would be residential in nature, (2) downtown residential development would average 44.4 units per acre, (3) 30 percent of the potential would not be realized because of market factors, and (4) all downtown development would be multi-unit in nature with a population capacity of 1.60 people per unit. As shown in **Figure 20**, there could be an additional 4,488 units of capacity lost in the downtown area to surface parking lots.

Figure 20: Surface Parking Lots in Downtown and Vicinity (Parcels Not Already in LCA Analysis)

Type	Parcels (Count)	Area of Parking (Acres)	Potential Unit Capacity[1]	Potential Population Capacity[2]
Entire Parcel is Surface Parking	140	37.5	388	622
Part of Parcel is Surface Parking	649	233.3	2,417	3,866
TOTAL	**789**	**270.8**	**2,805**	**4,488**

Source*: City of Spokane, LCA Analysis, 2024.*

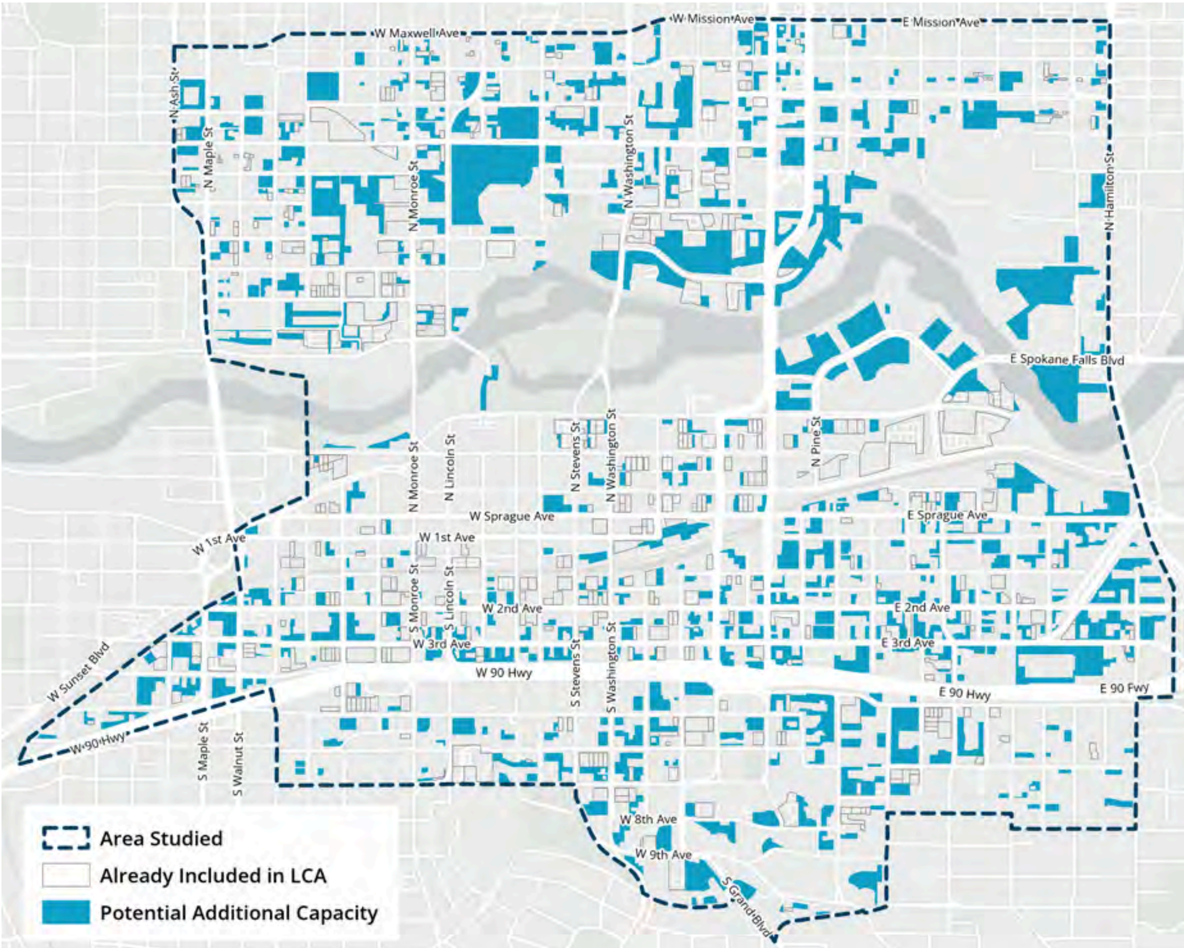
Notes*: 1. Unit capacity is calculated according to LCA assumptions (1/3 is residential, 44.4 units per acres, 30% removed for market factor).*

2. Population capacity is calculated according to LCA assumptions (all development is multi-unit, 1.60 people per unit).

For reference, **Figure 21** on the following page is provided, showing the location of all surface lots identified as part of this study. Those parcels that have already been considered in the normal LCA process are shown in outline. Parcels that were not captured by the LCA analysis are shown filled in, providing a good approximation of downtown surfaces lots that might provide additional capacity above and beyond what is identified in the LCA.

It is not expected that all surface parking could ever be eliminated from downtown Spokane. The reality is that some surface parking is inevitable when parcels are developed and redeveloped. However, it is also important to identify the possible capacity that could be tapped by the City if regulations or incentives were applied to make continued use of surface lots for parking less attractive to property owners and developers.

Figure 21: Surface Parking Lots in the Downtown Area



***Source**: City of Spokane, LCA Analysis, 2024. Surface lots were identified via a survey of Aerial Photography taken in Spring 2024.*

Of course, the need for parking in downtown Spokane is not going away in the foreseeable future. However, parking needs *can* be addressed through structures and other solutions that take up less land and that leave space for other uses like residential units. Additionally, while the analysis here shows almost 4,500 units of possible capacity downtown, redevelopment of parcels where only some of the parcel contains surface parking is considered much less likely. The capacity existing downtown in surface lots is probably closer to the parcels that are entirely occupied with parking, pointing to a capacity closer to 388 units or 622 persons. Still, this number is not insignificant and should inform policy decisions moving forward.

XV. Dissemination and Use of the LCA

All told, the analysis above has taken multiple years and the efforts of numerous City staff, as well as frequent and repeated coordination between all the other regional jurisdictions and agencies. The entire analysis has been conducted as carefully and thoroughly as possible given the time and resources allotted, and the result can be relied upon as the best available estimate of capacity in the City of Spokane. This analysis, along with many other efforts and studies, will inform the City during the 2026 major update to the City of Spokane Comprehensive Plan.

With the completion of this report, the City of Spokane has met the requirements of RCW 36.70a et seq. as it pertains to determining the City contains sufficient land capacity to accommodate expected growth within the planning horizon. Regional agencies and other jurisdictions may provide comments on this report. However, in accordance with RCW 36.70A.115, this Land Capacity Analysis is a City responsibility.

XVI. Summary Results

The City of Spokane must determine if the City, in its current boundaries and utilizing the current policy and zoning requirements, can accommodate expected growth between now and 2046. As currently allocated, the City should expect to accommodate at least 23,357 more residents between 2023 and 2046.

The end results of the analysis in this report are shown in **Figure 22** below. This table brings together all of the various figures and analyses presented in this report. No modification has been made to the numbers previously presented.

Figure 22: Summary Results - City of Spokane Capacity for Additional Population and Dwelling Units

Classification	Dwelling Unit Capacity	Population Capacity
Vacant, Outside PUD/Subarea	10,344	22,615
Partially Used, Outside PUD/Subarea	5,270	11,850
Underutilized, Outside PUD/Subarea	6,987	13,220
SUBTOTAL - OUTSIDE PUD/SUBAREA	**22,600**	**47,686**
Platted, PUD	337	843
Unplatted, PUD	4,226	8,038
South Logan TOD Subarea	2,954	6,735
SUBTOTAL - PUD & SUBAREA	**7,517**	**15,615**
GRAND TOTAL	**30,117**	**63,301**

Source: *City of Spokane, LCA Analysis, 2024.*

Notes: *This table is a summary of the detailed analysis within this report. Many factors not apparent in this table went into the data presented. The potential capacity represented by surface parking lots in the downtown area are not included in this table, thus the overall capacity of the City may be larger than what is presented here.*

The size of the city (more than 69.5 square miles) requires the use of generalized assumptions. A parcel-by-parcel review is not possible, nor can a single graphic depict accurately every portion of the city that provides additional residential capacity. However, the following pages contain maps showing the entirety of the City, as well as the status of various vacant, partially used, and underutilized parcels. Additionally, current PUDs and the South Logan TOD Subarea are depicted. Use or consideration of these maps is for reference only, as they do not tell the whole story of capacity in the city. For example, some parcels identified as vacant, partially used, or underutilized may still represent zero capacity. Furthermore, the scale of these maps is such that many parcels are too small to appear, where others may exist alongside other parcels where the differentiation between them isn't evident.

With these limitations in mind, the end of this report includes four maps showing the classification of all parcels in the City. Note that some classified parcels contain zero capacity, but are still shown on the map (e.g. underutilized parcels where the improvement value is greater than four times the land value represent zero capacity, but are still shown on the map as underutilized).

XVII. Non-Residential Capacity

The primary function of the LCA is to determine residential capacity (both housing units and population), but this is only part of the story when it comes to development capacity in a city. Non-residential capacity should be considered as well. Unlike population and housing, there are no Spokane County forecasts for commercial or industrial demand between now and 2046. Because of this, it's impossible to determine *how much* capacity is required to accommodate growth. Regardless, this section will attempt to quantify the amount of land available for non-residential development, in hopes that ongoing efforts for updating the City's Comprehensive Plan will help determine the demand for such lands.

Various zones in the city can be handled differently in this analysis, according to the requirements of the SMC (zoning code) and the assumptions in the LCA. Details follow:

Residential Zones

When determining commercial and industrial capacity, all lands zoned exclusively for residential uses can be discounted. While some non-residential uses are allowed in these areas, such as churches or community services, they don't typically occur in sufficient quantities to require direct analysis. Thus, the non-residential lands discussed here will exclude all areas zoned RA, R1, R2, RMF, or RHD.

Commercial, Office, Centers & Corridors, and Downtown Zones

For the purposes of this analysis, some of the assumptions used for residential development in the LCA can be used to determine capacity for non-residential uses in the same zones. In general, the LCA assumes that 1/3 of all future development in commercial, office, centers and corridors, and downtown zones will be residential in nature. Thus, non-residential capacity can assume that 2/3 of future development will be non-residential in nature. To that end, all classified parcels in these non-residential zones will assume that 2/3 of the land is available for non-residential development.

Industrial Zones

The SMC provides for some residential development within Light Industrial zones, provided it is within one quarter mile of the river. However, for the purposes of the LCA the LCA assumes that 100 percent of development in Industrial Zones is non-residential in nature. Naturally, as Heavy Industrial zones do not allow for residential development, they are assume to provide entirely non-residential capacity.

A Note on Airport Areas

The City of Spokane contains two major airports, managed cooperatively by the Spokane Airport Board whose members include City of Spokane and Spokane County representatives. These facilities are classified as Essential Public Facilities under state law and are thus worthy of protection from encroaching uses that might limit their operation. To this end, the SMC limits residential development within certain impact areas around both airports. Naturally, these areas were included in the LCA but classified properties within these areas were assumed to provide zero capacity for residential development. This same limitation is not true for non-residential development, in that many types of non-residential development can be placed within these airport protection areas without detrimental effects on airport operations. In fact, many different non-residential uses can enhance the operation of airports and help to strengthen their place in the local development environment.

While residential development is not expected in airport overlays in the LCA, these areas *are* included in the non-residential capacity discussion here. Accordingly, classified properties shown next to airports (see maps at the end of this report) might not contribute to residential capacity but these parcels do contribute to non-residential capacity.

Summary of Non-Residential Development Capacity

The summary table (**Figure 23)** on the following page provides an accounting of all vacant, partially-used, and underutilized parcels within the City, according to the assumptions above. This table does not include any development potential (such as square footage of buildings), nor is an overall capacity for non-residential development available for the entire city at this time. Accordingly, only the number of parcels and the acres of each area are included in the table. Additional analysis will be required in other reports and analyses to determine how much land is enough to accommodate future non-residential growth.

XVIII. Final Conclusions

The ultimate results of this analysis are that the City of Spokane currently contains sufficient lands to accommodate residential growth between now and 2046. The City can expect 23,357 additional residents by 2046. Given all the various factors and assumptions in the LCA, the City has current capacity to accommodate 69,484 people, far above expected growth. As for dwelling units, while the region continues to determine the required housing allocation for each jurisdiction, City of Spokane included, the City has sufficient capacity for 33,388 dwellings. This exceeds the current maximum number of units the City expects to be allocated (approximately 22,359 units)[15]. Accordingly, the City has met the capacity requirements of RCW 36.70a et seq.

Figure 23: Non-Residential Capacity by Density Group (Outside PUDs)

Classification	Parcels (Count)	Total Area (Acres)	Buildable Area (Acres)	Capacity Area[1] (Acres)
		Commercial/Office/CC		
Vacant	665	391.74	378.5	176.6
Partially Used	84	399.3	136.4	63.7
Underutilized	1,212	247.1	237.4	110.8
SubTOTAL	**1,961**	**1,038.1**	**752.2**	**351**
		Downtown		
Vacant	94	28.7	23.1	10.8
Partially Used	32	49.9	40.2	18.8
Underutilized	192	44.0	42.7	19.9
SubTOTAL	**318**	**122.6**	**106.0**	**49.5**
		Industrial		
Vacant	392	732.7	716.9	476.6
Partially Used	89	316.0	178.4	119.1
Underutilized	268	86.1	84.7	55.5
SubTOTAL	**749**	**1,134.8**	**980.0**	**651.2**
		TOTAL		
Vacant	**1,151**	**1,153.0**	**1,118.4**	**664.0**
Partially Used	**205**	**765.3**	**355.0**	**201.5**
Underutilized	**1,672**	**377.2**	**364.8**	**186.2**
TOTAL	**3,028**	**2,295.5**	**1,838.2**	**1,051.7**

***Source**: City of Spokane, LCA Analysis, 2024*

***Notes**: Market Factor has been applied to these quantities, as well as commonsense, real-world factors that would potentially affect development capacity, as allowed in the adopted LCA Methodology and documented in this report. This result is theoretical and at a macro-scale. Interpolation of this data into smaller geographic areas (e.g. neighborhoods) could introduce significant errors into the results.*
1. Capacity Area represents 70 percent of the total buildable area.

[15] The regional process for determining each city's allocation for housing under the requirements of House Bill 1220 and RCW 36.70a.070 is not yet complete. Thus, the analysis in this report does not explore those requirements further. The maximum amount mentioned herein represents the highest total allocation currently under discussion at the regional level.

Figure 24: LCA Classification Maps - Northwest Quadrant

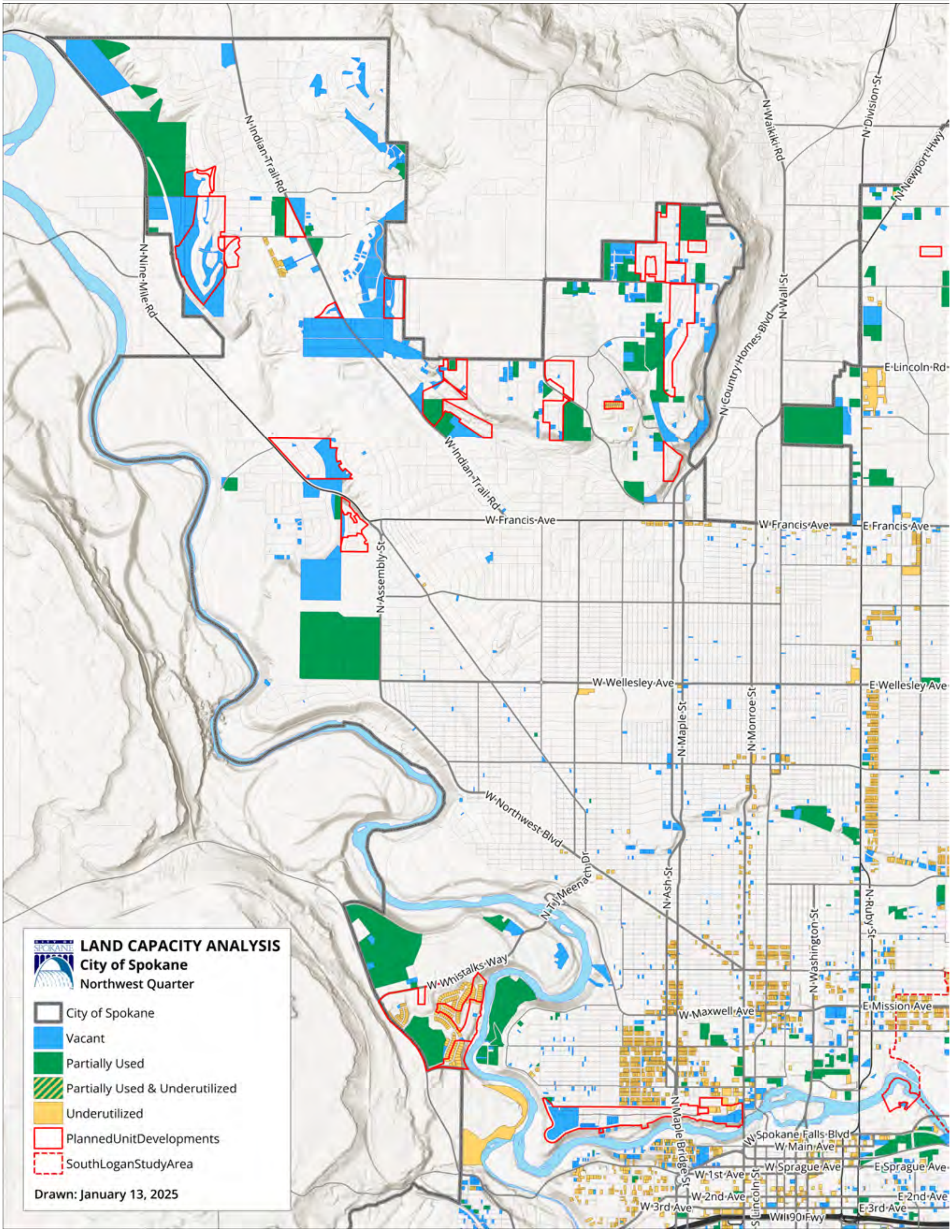


Figure 25: LCA Classification Maps - Northeast Quadrant

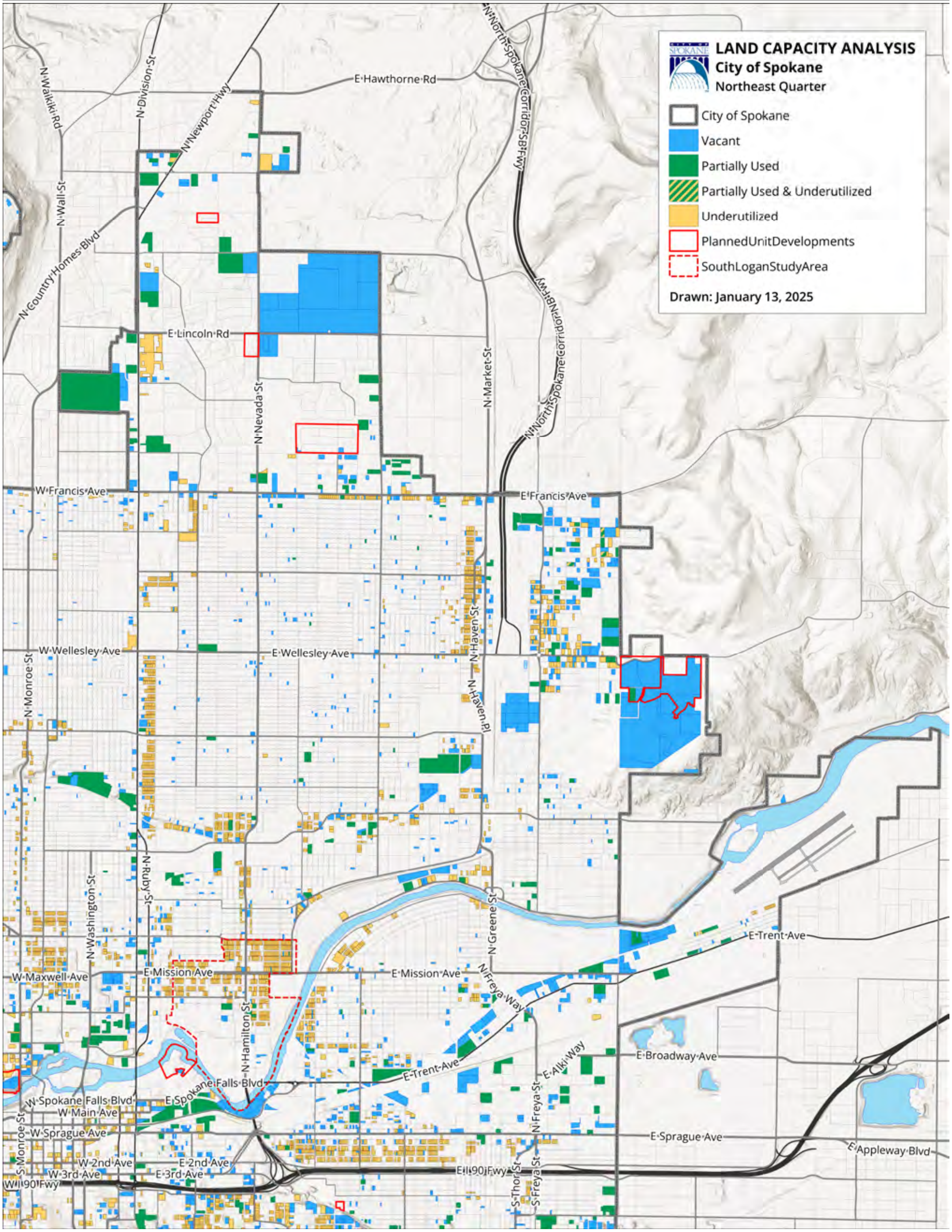


Figure 26: LCA Classification Maps - Southwest Quadrant

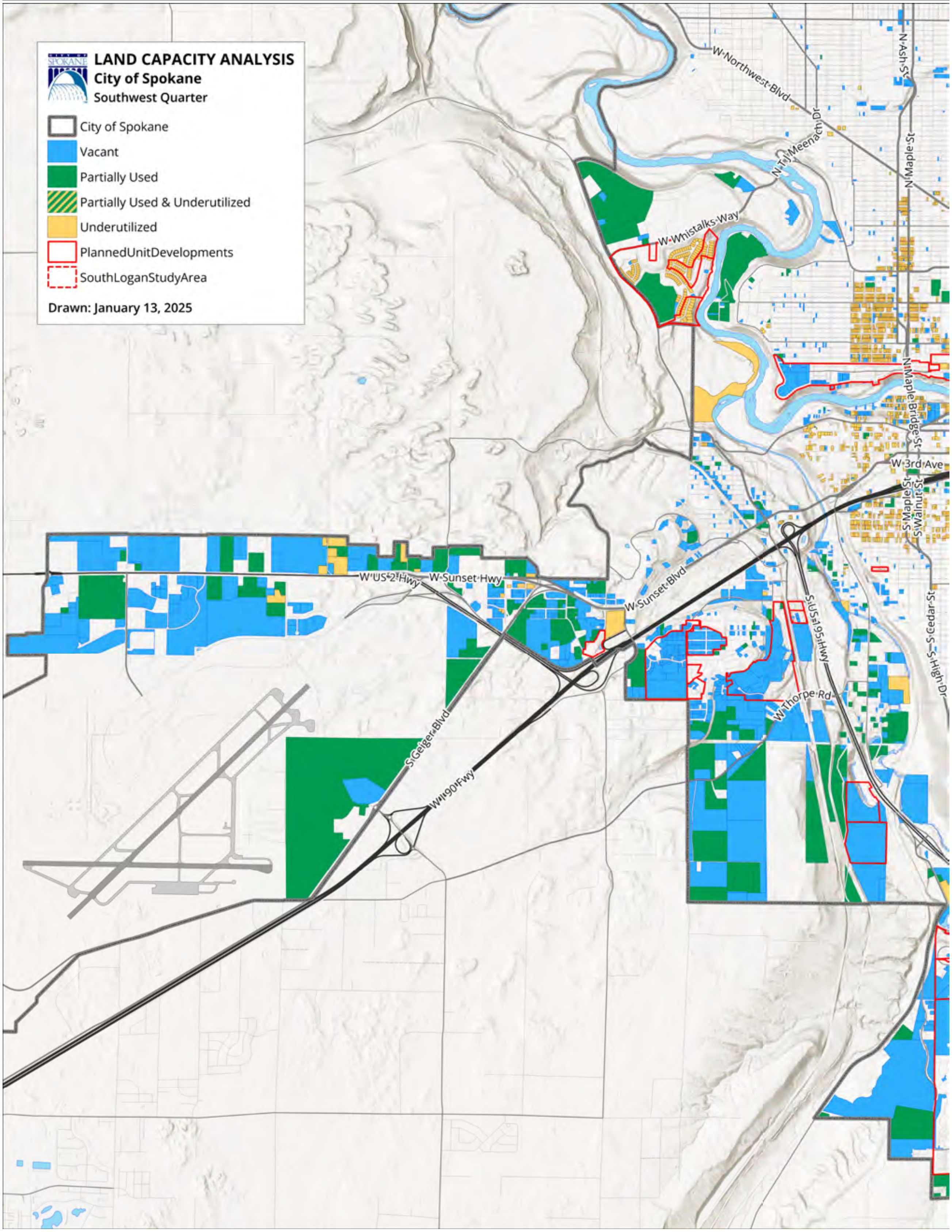
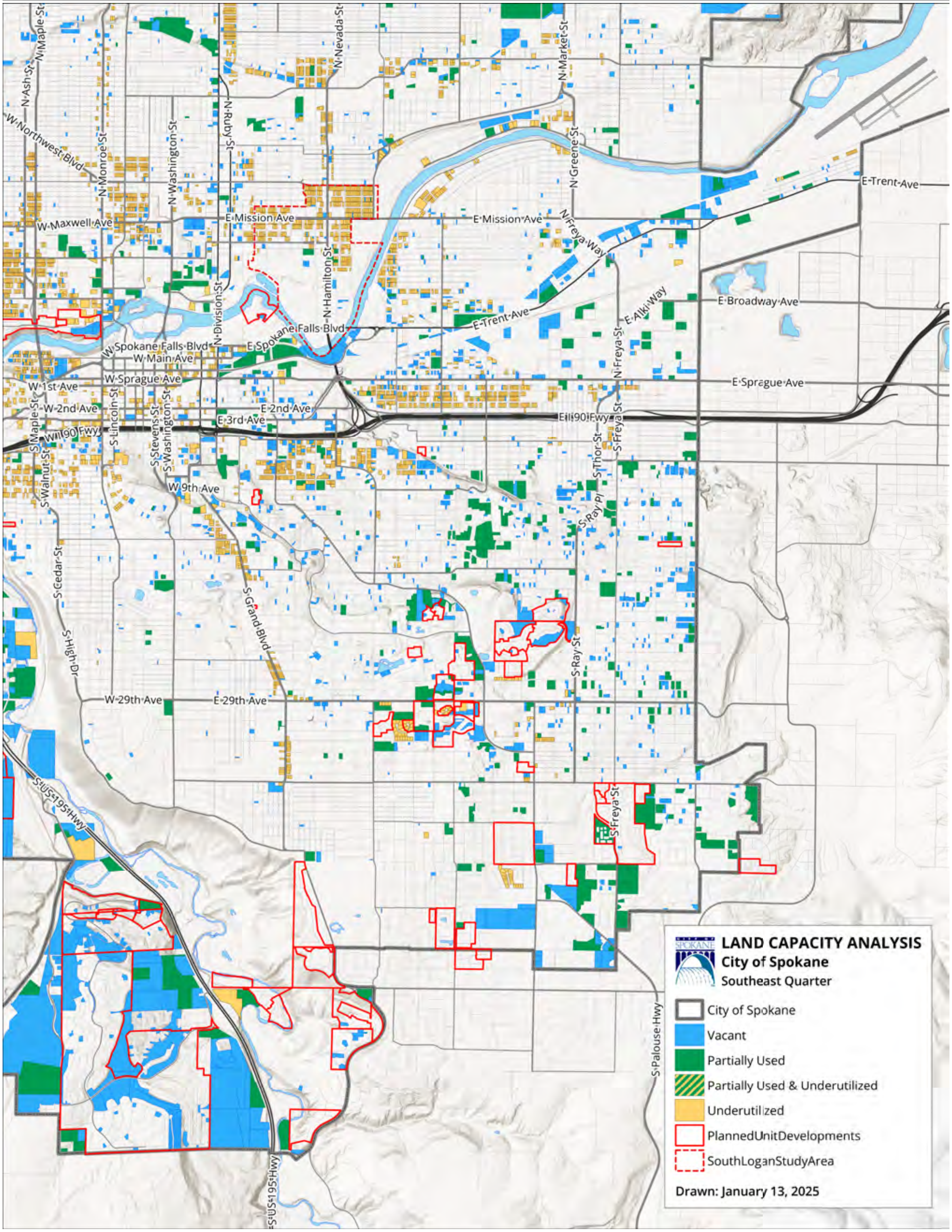


Figure 27: LCA Classification Maps - Southeast Quadrant



Appendix A: Residential Density Assumptions

Briefing Paper

LCA 2025: Proposed Residential Density Assumptions

Department of Planning & Economic Development

Overview

The Land Capacity Analysis (LCA) seeks to answer a relatively easy question, "Does the city contain sufficient land capacity to accommodate expected growth in the city within 20 years?" To answer the question, the LCA will apply a series of common-sense and (when possible) data-informed assumptions to determine how many additional people the city can accommodate in that time, essentially by determining how many dwelling units could be developed given the existing inventory of vacant, partially used, and underutilized land in the city. The population allocation for the City of Spokane is 23,357 additional residents by 2046.

This paper summarizes the residential development environment in the City of Spokane and proposes some assumptions that might be applied to vacant, partially used, and underutilized lands in the city.

Residential Lands in Spokane

Lands identified by the LCA include three categories, distinct from unbuildable areas like steep slopes and water as well as public lands and areas earmarked for other purposes. These categories are:

> Vacant—generally undeveloped land with limited improvements on site.
>
> Partially Used—Large occupied/developed lots with sufficient undeveloped portions to be further subdivided, if the owner desires it.
>
> Underutilized—Developed properties where the existing use is less intense/dense than for what the property is zoned, such as a single-unit house zoned for multi-unit residential development.

Low Intensity Residential Density

The primary focus of the LCA is residential, thus the assumptions used to determine development capacity are more detailed when it comes to Residential than may be assumed for commercial or industrial development. According to the City's current zoning schema, residential capacity analysis should consider at least two levels—lower intensity residential (one-unit structures and middle housing) and higher intensity residential (5+ units per structure).

When it comes to low intensity residential uses, it is helpful to first understand that most of the existing development in the city is comprised of single-unit residential structures. The largest land use in the city by land area is single-unit residential homes, occupying more than 11,600 acres of the city (60,356 parcels). The following table (**Table 1**) provides some general information on the net density citywide for these single-unit parcels. See **Figure 1** at the end of this briefing paper for a general depiction of where those single-unit residential uses are located.

Table 1: Net Density Summary: Existing Single-Unit Residential

Total Acres	Parcels	MAXIMUM Density[1] (du/ac)	AVERAGE Density[1] (du/ac)	MEDIAN Density[1] (du/ac)	MINIMUM Density[1] (du/ac)
11,648	60,356	35.6	6.1	6.2	0.1

***Source**: City of Spokane, Planning & Economic Development, Geographic Information Systems, 2024.*
***Note**: [1.] All densities are "net," calculated according only to the individual parcel area. Rights-of-way, street frontage, and other "non parcel" areas are not included in the calculation.*

As shown in **Table 1**, single-unit residential density varies widely throughout the city. Highest density parcels are generally the oldest, being located nearest the river, while the lowest density parcels are found in relatively "rural" areas in Grandview Thorpe and Latah, where the character remains largely what it was then those areas were annexed decades ago.

While the Comprehensive Plan does not mandate a density range for areas of "Residential Low" land uses, a range of assumed densities is described for planning purposes. Those densities range from 4 to 10 dwellings per acre[1]. Past residential development, with an average existing development density of 6.1 (see **Table 1**), appears to conform on average with the expectations of the Comprehensive Plan.

Because single-unit residential density varies so widely in the City however, utilizing the average density is an insufficient indicator of future capacity throughout *all* parts of the City. To explore possible adjustments to residential density to account for the location in the City, and in consideration of the fact that new development in one area tends to conform to the existing pattern of past development, staff summarized net single-unit residential density in each surveyed Section of the city, and found the average single-unit net density in each Section.

Because some Sections do not contain *any* existing single-unit residential while other Sections include only a tiny portion of the city, the resulting average density can be missing or unduly skewed in some Section. Interpolation is necessary to mitigate this. To interpolate these Section-by-Section densities to cover the entire City, an areal interpolation was creating using ArcGIS Pro software. An areal interpolation takes limited geographic data and applies mathematical methods to interpolate values for areas with no data (Sections with no single-unit residential development) and to even out the effect of Sections with limited City land within them. The result of this interpolation is shown in **Figure 2** at the end of this document.

As **Figure 2** indicates, the highest single-unit densities are found in the city's core, namely in the Emerson/Garfield, West Central, Peaceful Valley, and Browne's Addition neighborhoods. Secondary nodes of higher average density (10 units/acre) can be found in the Shiloh Hills and Hillyard neighborhoods. The lowest densities are found in the West Hills, Grandview Thorpe, and Latah/Hangman neighborhoods as well as in parts of North Indian Trail and Five Mile. A notable

[1] *Comprehensive Plan, Chapter 3, Land Use, p. 3-45*

exception is the portion of Latah/Hangman containing the Eagle Ridge and Qualchan developments, where single-unit residential density rises to 7 units/acre. Considering the wide range of densities existing throughout different parts of the city, it seems reasonable to apply a factor to any assumptions for future development that will account for this. In general, the City should assume that low intensity housing near the core will be at a slightly higher density than it will be at the edges.

The interpolation shown in **Figure 2** was generated mathematically, thus that map is ignorant of on-the-ground conditions such as topography, water, and known situations where standards are actively changing (e.g. the South Logan TOD Study Area). Accordingly, **Figure 2** was adjusted by staff to create a proposed "Assumed Residential Density" that would apply to low-intensity residential areas in the LCA, resulting in the proposed assumed densities shown in **Figure 3**. Any vacant low-intensity residential lands—those not inside a valid Planned Unit Development (PUD)—would be assumed to develop at a range of densities depending on location, from as low as four units per acre to as high as eight.

In the case of PUDs, the amount of land remaining to be platted coupled with the original number of units approved for the PUD will be used instead. In other words, the analysis will assume the PUD builds out as it was approved.

Effect of BOCA/BOH on Residential Density

The City has recently adopted significant changes to its density and residential standards through two projects, the Building Opportunity and Choices for All (BOCA) interim ordinance and the permanent Building Opportunity for Housing (BOH) ordinance. While these have changed the way the City's Comprehensive Plan and Municipal Code handle low intensity residential development in the city, it would be inaccurate to say that the density of development has risen precipitously in the short time since those ordinances were passed. Only two and a half years have passed since these ordinances were adopted. In that time, fewer than 40 projects have been permitted that were directly related to, or enabled by, BOCA and BOH. For example, in 2022 only 3.4 percent of all middle housing permits (4-unit developments and below) were flagged as being related to the BOCA/BOH changes. In 2023, 7.4 percent of middle housing permits were flagged as such.

That isn't to say that BOCA and BOH had no effect, nor is it evidence that those ordinances have "failed," as is sometimes asserted by others. Rather, there are mitigating factors that result in modest changes in these first few years, such as:

- Time is required for developers, owners, financial institutions, and others to become comfortable with the changes.
- Projects permitted today have often been planned and designed years before, leading to a multi-year lag projects as change to meet new expectations.
- A majority of the city is already developed, limiting the immediate effects of BOCA/BOH to mostly small infill projects.

It will be some time before enough infill occurs in the City to generate sufficient data on the effectiveness of BOCA/BOH. Accordingly, staff feels it is premature to rely on the effects of BOCA/BOH when determining residential capacity in the City of Spokane, *for now*. Staff recommends that the LCA not rely on any "bonus" capacity that would result from BOCA/BOH at this time. However, when the City revisits residential capacity in five years, as required by the

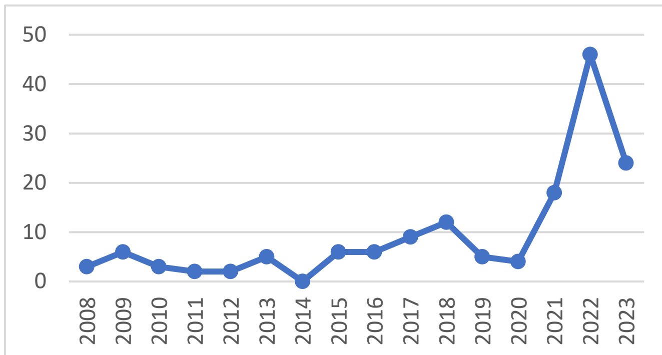
Growth Management Act, staff *strongly* recommends that the City analyze and consider how BOCA/BOH has affected the density and capacity for residential projects in the city and adjust their calculations accordingly at that time.

Effect of ADU Code Changes

Accessory Dwelling Units (ADUs) cannot be ignored when considering future residential densities versus those seen historically in the City of Spokane. Numerous recent legislative changes at the State level, as well as multiple efforts by the City of Spokane, have changed the ADU development environment significantly, making ADUs much easier to permit and much more likely to be built.

As seen on the chart at right, the number of ADUs permitted each year has risen steeply in recent years. While 2024 is not yet over, the City has already permitted more than the average number of ADUs. Additionally, recent elimination of parking minimums in the city and other corrections and adjustments to the Residential section of the Spokane Municipal Code (SMC 17C.111) are expected to make ADU development more common.

Chart 1: ADUs Permitted by Year



For the purposes of the Land Capacity Analysis, however, there are a few moderating factors to keep in mind. Firstly, while ADU permits have risen significantly, the overall number of permits issued each year has also risen. Accordingly, while ADUs made up approximately 0.8 percent of City permits in 2014, the percentage rose only slightly to 2.0 percent in 2022 and 2023. Development of ADUs as a percent of overall residential permits has risen, but not enormously. Additionally, when considering residential capacity, the City must accept that much of the remaining low-intensity residential capacity is tied up in PUDs with covenants and other restrictions that prevent the development of ADUs. Until the State acts to make such restrictions illegal, much of the city's remaining vacant land cannot accommodate ADUs, no matter whether they are allowed by the SMC or not.

Further complicating matters, ADUs are not restricted to new development on vacant parcels. Many ADU units are constructed on parcels with existing homes or other residential development. As such, the LCA cannot assume that development on vacant parcels represents an accurate estimate of future ADU permits and capacity. With this in mind, rather than attempt to assign a percentage of vacant parcels expected to develop with ADUs, the City should instead consider the current trend of ADU permits and conservatively assume that this trend continues. Assuming that the City can expect approximately 30 ADU permits per year, over the 20 year horizon the City should expect 600 ADUs within that time period.

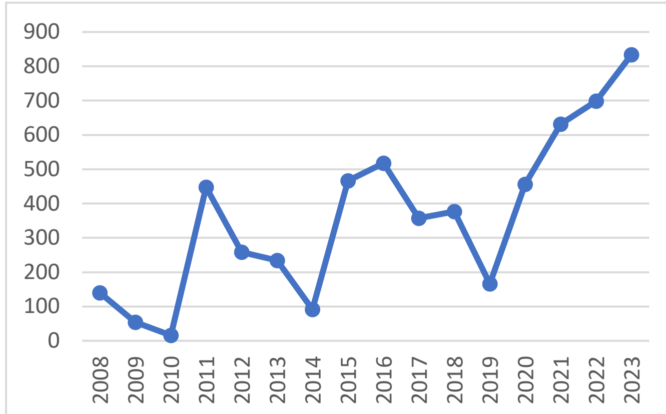
As with the effect of BOCA/BOH discussed earlier, staff strongly recommends that the City continue to track and analyze ADU permits. This analysis should be conducted with an eye towards refining the City's assumptions at the five-year growth check required by GMA.

Higher Intensity Residential Development in Residential Zones

In prior rounds of the LCA, the City utilized historic multi-unit permitting to inform what densities the City might see in the next 20 years in higher intensity residential areas. Staff recommends the same approach this time, especially as the number of multi-unit structures permitted in the City continues to rise.

Strictly in terms of units permitted, the chart at right shows the number of units in 5+ Unit structures permitted each year since 2008. While high intensity residential development is naturally cyclical, having years of high activity followed by one or more years of lower numbers, the multi-year average number of units is rising. In 2017 the five-year average for high-intensity permitting was 183 total units. In 2023 the five-year average had risen to more than 550 total units.

Chart 2: Units in 5+ Unit Structures Permitted by Year



To apply permitting data to the LCA, however, the amount of land occupied by those developments must be considered as well. To determine this, staff ran a report of all residential permits issued and/or completed prior to April 1, 2024 and geolocated them using ArcGIS Pro. Then the area of the parcel(s) occupied by the development was measured and a net density calculated for each one. Some hand adjustment to the density calculated for each project was required to account for pre-existing development as well as known areas that were undevelopable to begin with, such as steep slopes and wetlands on individual sites.

Multi-unit (5+ unit) development in the past five years totaled 3,102 new units, 1,605 of which have been completed as of September 10, 2024. **Table 2** below provides summary data only for units completed in the past five years.

Table 2: Net Density Summary: Five Year Completions, Multi-Unit Residential (5+ Units per Project)

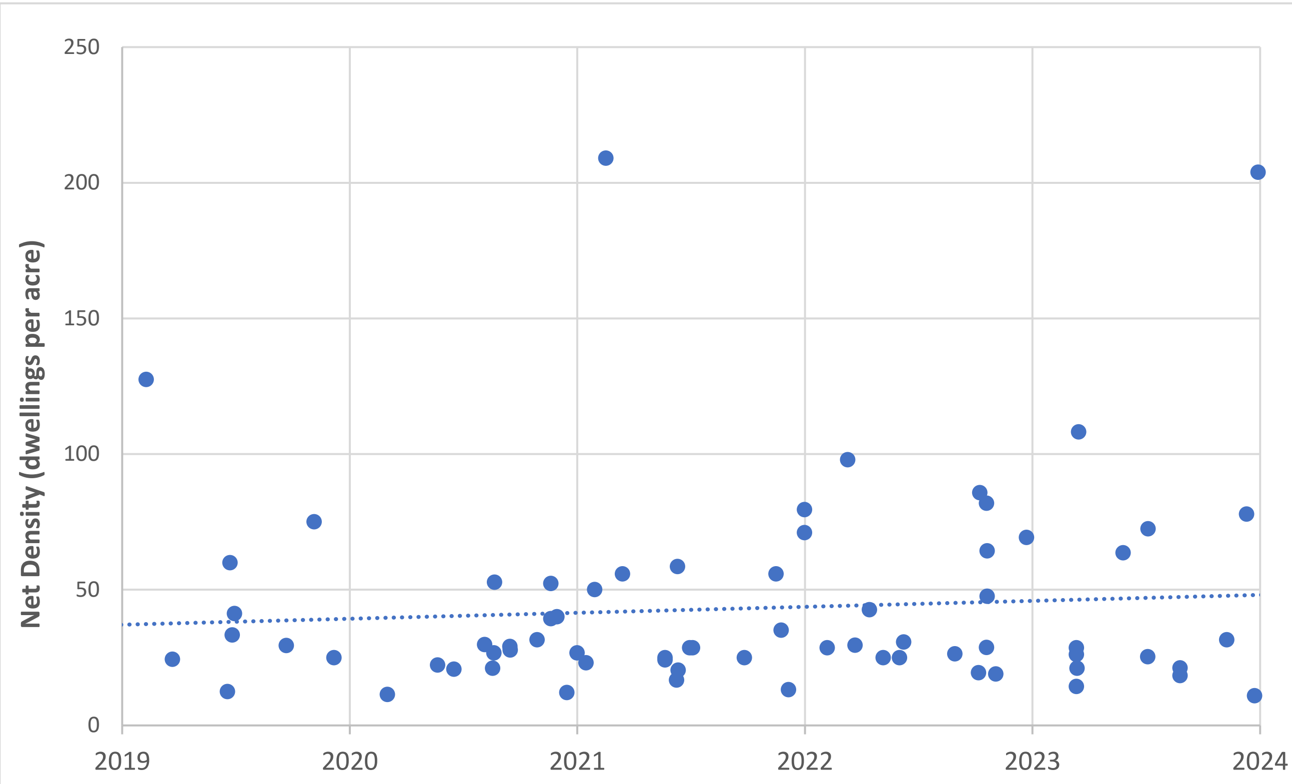
Total Acres	Parcels	MAXIMUM Density[1] (du/ac)	AVERAGE Density[1] (du/ac)	MEDIAN Density[1] (du/ac)	MINIMUM Density[1] (du/ac)
105	82	209.1	43.7	29.0	10.7

Source: *City of Spokane, Planning & Economic Development, Permitting Data.*
Note: *[1.] All densities are "net," calculated according to only the parcel area. Rights-of-way, street frontage, and other "non parcel" areas are not included in the calculation. Additionally, some parcel areas have been adjusted manually to account for known unbuildable areas and other factors such as multiple phased development on a single parcel.*

While the *number* of units overall has increased in the past five years, the LCA should consider whether the density is growing or shrinking over time as well. To this end, the following chart (**Chart 3**) provides a scatter graph of the density of each of the projects in **Table 2** (charted over time) and a linear trend line. The density shown in **Chart 3** represents net density by not accounting for streets, utility corridors, and frontages in the Right-Of-Way.

The slope of the resulting trend for density over time indicates that density per project may rise, but only slightly through the planning horizon of twenty years. To provide a conservative analysis in the LCA, however, staff recommends using a flat average density with no increase over time.

Chart 3: Density of Multi-Unit (5+ Unit) Residential Development 2019-204



Source*: City of Spokane, Planning & Economic Development, Permitting Data.*
Note*: Each dot represents a single project from Table 2 above. The dashed line represents a linear trend line.*

Because multi-unit development during the previous five years in higher intensity zones in the city has been well distributed geographically, staff does not recommend any change to that average density based on location (unlike low-intensity residential density discussed earlier in this report). However, the question remains as to which density value to assume for multi-unit development.

The median density value for multi-unit development (29 du/ac) is significantly lower than the average (43.7 du/ac). In essence, this is due to a few very dense projects pushing the average higher. The very nature of a median means that an equal proportion of units have been developed above that point than below, providing an effective middle ground between very very dense projects and those that provide for lower overall densities. Accordingly, and to ensure a conservative estimate, we recommend the use of the median density for all higher intensity residential zones (RMF and RHD).

Residential Development in Non-Residential Zones

In addition to higher intensity residential areas of the City (discussed above), residential capacity exists in many other non-residential zones in Spokane. All zones in the City of Spokane allow residential development, save for Heavy Industrial and Light Industrial (outside ¼ mile of the river). Accordingly, not only must the LCA consider the overall multi-unit density in Residential High

Density and Residential Multi-Family zones, but also possible residential development in all commercial, office, and downtown designations.

To that end, staff pulled a list of all building permits for properties within commercial, office, centers & corridors, and downtown zones from September 2021 through September 2024. A longer series of data would be ideal. However, this data is not readily available from the City's permitting database at this time. It is recommended that future analyses, such as the required 5-year check of growth in the City in 2031, consider updated data and possible adjustment of this assumption.

Permits for non-residential zones between September 2021 and September 2024 were then sorted into the following categories:

Minor: Small renovations, equipment installs, repairs, etc. that do not affect residential capacity.

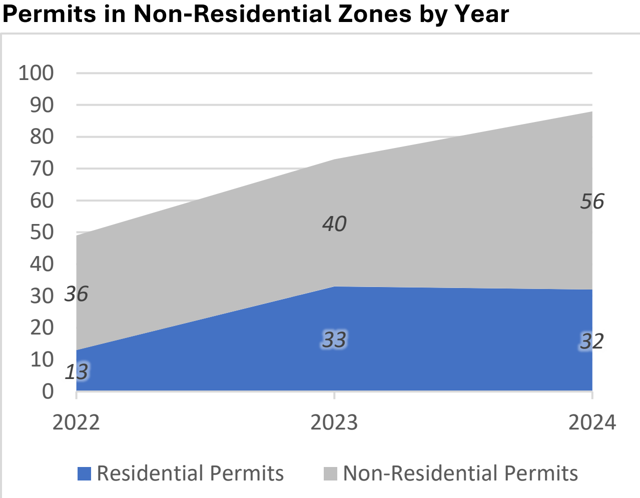
Tenant Improvements: Small interior changes and rebuilds that do not affect residential capacity.

Non-Residential: New buildings and significant changes to existing buildings for projects that do not currently contain a residential component.

Residential: New buildings and significant changes to existing building that increase the amount of residential development in the city.

Any "minor" permits or "tenant improvements" were ignored because they could not affect residential capacity in the city. For the remaining permits, 79 were classified as "residential" and a further 134 classified as "non-residential." Next, those two classifications of permits were summarized by year, shown in **Chart 4** below.

Chart 4: "Non-Residential" and "Residential" Permits in Non-Residential Zones by Year



***Source**: City of Spokane, Planning & Economic Development, Permitting Data, September 2022 to September 2024.*

As shown, the ratio of residential to non-residential permits in non-residential zones varies widely from year to year—from 26.5% to 45.2%. To provide a conservative but realistic assumption for residential development in non-residential zones, staff recommends assuming that one third, or 33.3 percent, of all future development in non-residential zones (excluding industrial zones) will be residential in nature.

For the LCA summary of available capacity, every acre of vacant non-residential land (excluding Heavy Industrial and portions of Light Industrial that lie more than ¼ mile from the river) should be assumed to provide 1/3 residential capacity and 2/3 non-residential capacity. Stated another way, if 100 acres of non-residential zones are vacant, 33 acres would represent available multi-unit residential capacity and 67 acres would represent non-residential capacity.

While approximately one third of all non-residential zones are expected to represent residential capacity in the city, that is only half the picture. Expected density of development in those areas is important as well. To that end, staff geolocated each of the residential permits since September 2021 to determine where they were located and, ultimately, the new density of each development. Significant hand adjustment was necessary to avoid repletion and double counting due to the functional needs of the City's permit database.

For example, in the case of large apartment complexes with multiple buildings each separate building is required to obtain a building permit while simultaneously each building occupies only a portion of the overall land. Thus, staff identified those special cases by hand and aggregated development to be sure that units and land were not double counted. Other permits were adjusted due to pre-existing development on the site, such as in the case of a building where half the interior had been completed in prior years, but the remaining half has just recently been completed.

Once the data was corrected and geolocation was checked for accuracy, staff compiled all residential development in non-residential zone and conducted one additional summarization, grouping all "downtown" development. Considering the resulting data, the conclusions presented in **Table 3** below were evident.

Table 3: Density Summary: Residential Uses in Non-Residential Zones and Downtown

Area	TOTAL Units	TOTAL Acres	PERCENT of Selected Projects	Gross[1] Density (du/ac)	AVERAGE Net Density[1] (du/ac)	MEDIAN Net Density[1] (du/ac)
Downtown	248	4.36	17%	56.85	54.64	44.35
Outside Downtown	1,982	91.20	83%	21.73	34.96	30.16

Source*: City of Spokane, Planning & Economic Development, Permitting Data.*
Note*: Some manual adjustment and aggregation of data was conducted to avoid double counting and other effects of multiple permits/development on a single parcel or for developments with pre-existing structures/improvements that remain.*
[1]. Gross density was calculated by adding up all the acres of permits in the area and dividing by the total units.
[2]. Amounts indicated as "net" were calculated only according to the individual parcel area. Rights-of-way, street frontage, and other "non parcel" areas are not included in the calculation. Additionally, some parcel areas have been adjusted manually to account for known unbuildable areas and other factors such as multiple phased development on a single parcel.

While the majority of projects have occurred outside the downtown area, **Table 3** makes it clear that density downtown is much higher than in other non-residential zones throughout the City. This conforms with the expectations of the Comprehensive Plan, which calls for Downtown to serve as the regional center with higher intensity development than all other areas.

As with higher-intensity residential development assumptions discussed previously, staff recommends that the City assume the median net density when calculating the capacity of projects in non-residential zones, differentiated between downtown (44.4 units/acre) and outside the downtown (30.2 units/acre).

<u>A Note on Downtown Residential Capacity</u>

A study is currently underway by the Downtown Spokane Partnership (DSP) to determine the residential capacity of the downtown core, considering multiple factors that affect density and overall unit capacity. Unfortunately, that report will not be complete in time for the first-round

LCA analysis. As such, staff recommends that the required analysis of the City's progress towards growth allocations in five years include a consideration of the results of this (and any other acceptable reports of that nature) at that time.

Concluding Summary

According to the above analysis, staff feels the following assumptions should be applied to the LCA for the City of Spokane:

Table 4: Proposed Summary Assumptions for the Land Capacity Analysis

Assumption	Value	Source
Low-Intensity Residential (R1 and R2 zones)	5-9 units/acre, depending on location	Interpolated existing density by geographic section.
BOCA/BOH	No adjustment at this time.	n/a
Accessory Dwelling Units	600 ADUs over the planning timeline.	Permit history since 2008.
Higher-Intensity Residential (RMF & RHD zones)	29.0 units/acre regardless of location.	Analysis of multi-unit permits since 2019.
Non-Residential Zones, Downtown	44.4 units/acre, limited to 33.3% of all available downtown lands.	Analysis of non-residential zone development since 2022.
Non-Residential Zones, Outside Downtown	30.2 units/acre, limited to 33.3% of all available non-residential lands.	Analysis of non-residential zone development since 2022.

Future Considerations

As discussed above, staff recommends the following considerations be included in future analyses (such as during required analyses in 2031 per GMA):

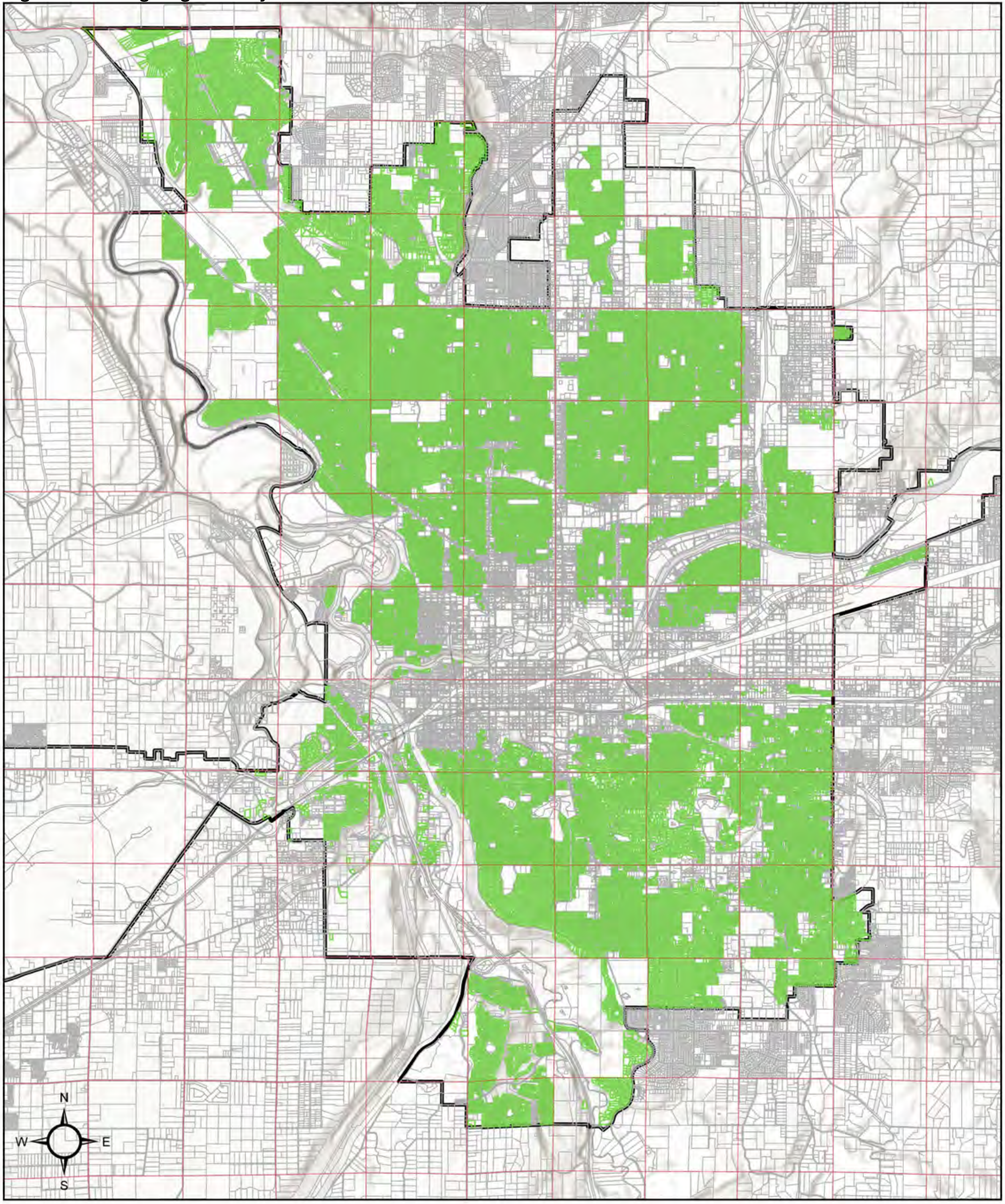
- Updated consideration of BOCA/BOH effects on density and capacity.
- Updated statistics and impacts of accessory dwelling units.
- Analyze residential development in non-residential zones over a longer timeline (i.e. 5 years rather than 2.5).

Report Preparation

This report was prepared by Kevin Freibott, Senior Planner, Planning & Economic Development department as a necessary step towards the completion of the City of Spokane 2025 Land Capacity Analysis.

Appendix A

Figure 1: Existing Single-Family Residential Parcels



CITY OF SPOKANE

Existing Single-Family Residential Parcels
Existing Development Only

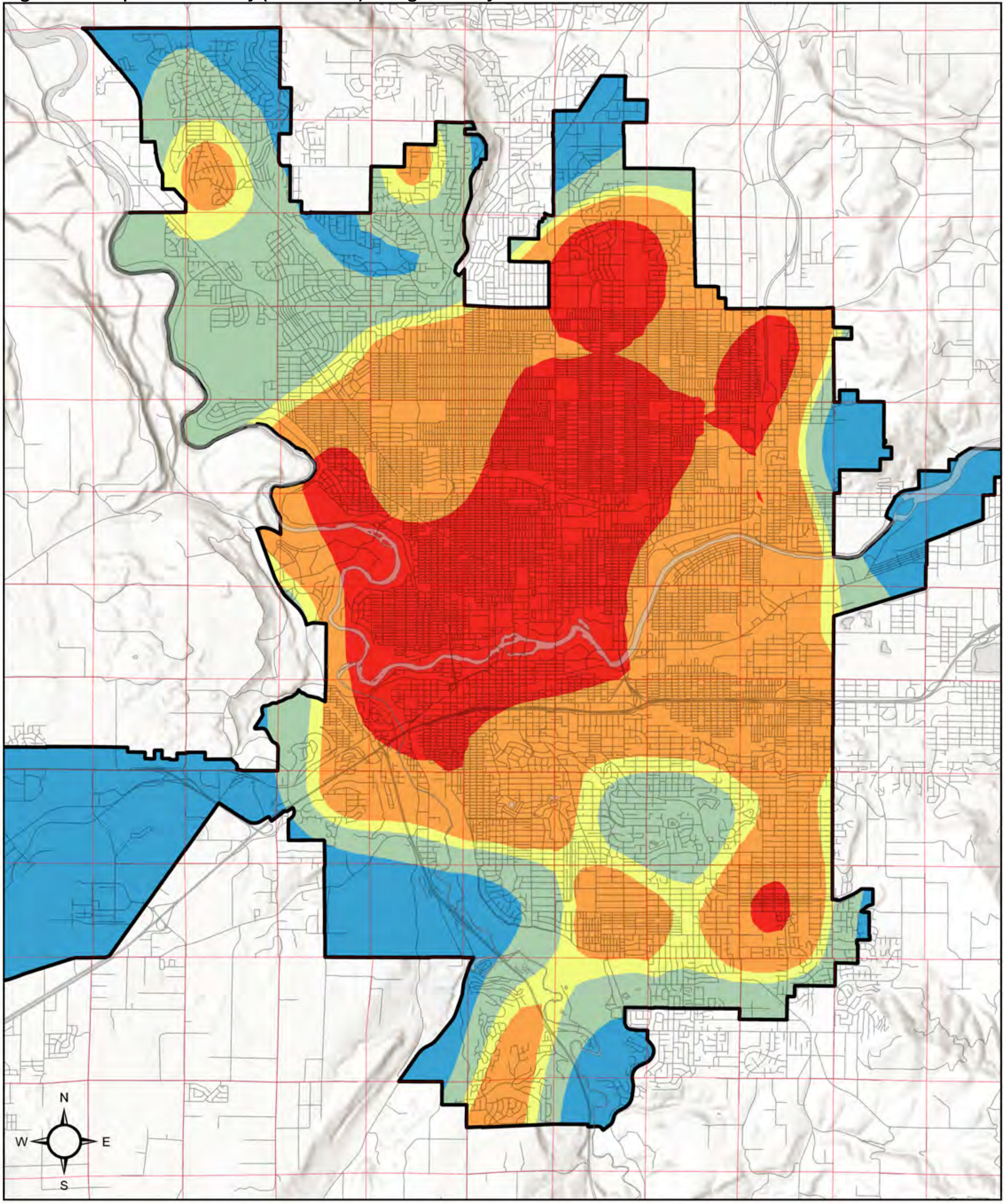
Existing Single-Family Residential
Parcel

Planning & Economic Development Department
Draw Date: 7/2/2024

Path: H:\Planning\Programs_Long_Range\GIS Mapping Program\LQA2025\LQA2025.aprx

Appendix A

Figure 2: Interpolated Density (Units/Acre) - Single-Family Residential Parcels



CITY OF SPOKANE

Interpolated Density (Units/Acre)
Single Family Residences Only

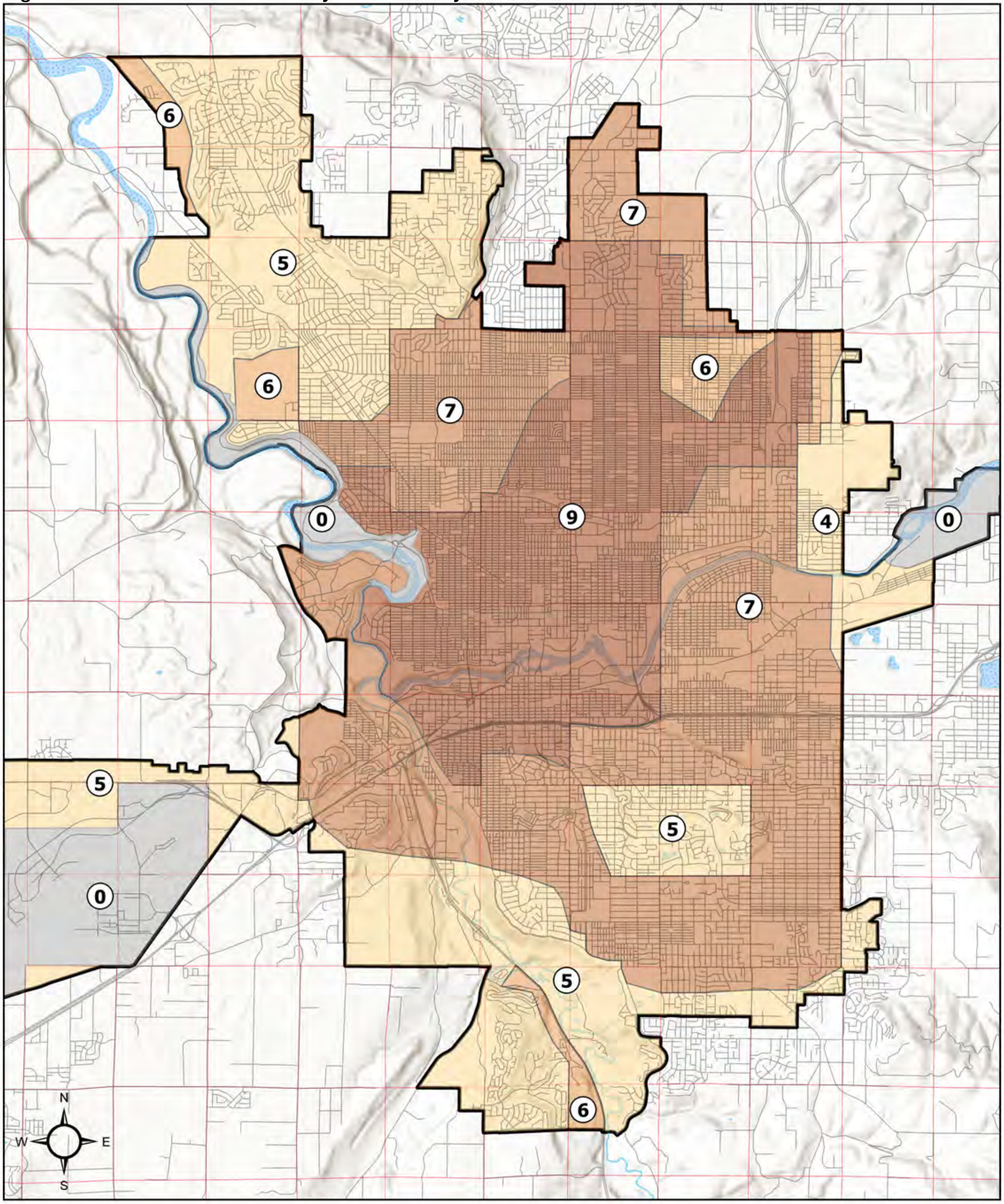
Planning & Economic Development Department
Draw Date: 7/2/2024

4	6	10
5	7	NoData

Path: H:\Planning\Programs_Long_Range\GIS Mapping Program\LQA2025\LQA2025.aprx

Appendix A

Figure 3: Assumed Residential Density - Low-Intensity Zoned Areas



CITY OF SPOKANE

Assumed Residential Density (Units/Acre)

To be Applied to Low-Intensity Residential ONLY

Planning & Economic Development Department

Draw Date: 11/12/2024

The values above were determined via an Areal Interpolation of existing low-intensity residential development, corrected by physical limitations and other known factors applied by Planning staff. These values would be applied to the Land Capacity Analysis assumptions only for low-intensity zones and only in locations where a Planned Unit Development DOES NOT exist.

Path: H:\Planning\Programs_Long_Range\GIS Mapping Program\LQA2025\LQA2025.aprx

City of Spokane
Department of Planning & Economic Development
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Accommodating Affordable Housing

in the City of Spokane, Washington

a requirement of the Growth Management Act (RCW 36.70A.70)

June, 2025

PLANSPOKANE
Resilient | Connected | Livable | 2046

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Figures

Executive Summary

The State of Washington has adopted new legislation that requires communities like Spokane to ensure they can accommodate needed housing in various affordability brackets when updating their Comprehensive Plans. As the City of Spokane is undertaking the next mandated Periodic Update to its Comprehensive Plan, the City must consider growth for the next twenty years. Sufficient capacity must exist in the City to accommodate housing development in these brackets.

The City has analyzed its housing unit capacity already as part of the adopted Land Capacity Analysis (LCA) for the City of Spokane. This report expands upon the findings of the LCA in order to differentiate the available land capacity by affordability bracket.

Affordability in Spokane is established by a percentage of the Area Median Income (AMI), set by the U.S. Department of Housing and Urban Development. Currently, the City of Spokane exhibits a median three-person family income of $90,720 per year, through which the City can determine the various affordability brackets as follows:

- 0-80% AMI = $0 and $72,600
- 80-120% AMI = $72,601 and $108,864
- 120+% AMI = more than $108,864

To determine where in the City units might be affordable for these incomes, the analysis used publicly available commercial price data from Zillow.com, Redfin.com, Rentcafe.com, and Apartments.com. Tenure information from the American Communities Survey (ACS) was then used to determine what proportion of units in a given part of the city might be rented or owned. By comparing the unit capacity in the LCA against the affordability information from the web-based sources *and* the tenure (rent vs. own) data from the ACS, the City has determined which units of capacity in the LCA are expected to fall within one of the three affordability brackets.

By applying the analysis outlined in this report, the City determined that even though there currently exists sufficient land capacity for 33,000+ units, the City cannot likely accommodate the needed units in the most affordable category, 0-80% AMI. The specific number of units in each category the City *can* accommodate is shown in **Figure 1** below.

Per the Washington Department of Commerce guidance on the subject, the City must now contemplate certain amendments to development strategies, code requirements, and policy towards raising the number of 0-80%AMI units the City can accommodate in the next twenty years. What those amendments might be will be a topic of the upcoming Environmental Impact Statement and Comprehensive Plan Periodic Update.

Figure 1: Final Results–City of Spokane Housing Unit Capacity by Affordability

	0-80%AMI Units	80-120%AMI Units	120+%AMI Units
Need (Commerce HAPT, 2020-2046)	15,347	2,588	4,424
Units Completed (2020-2024)	1,328	507	978
Capacity for Additional Growth (2025-2046)	**9,654**	**8,036**	**12,475**
Comparison RESULT	**-4,365**	**5,955**	**9,029**

Source: *New Units Needed = Department of Commerce Housing Allocation Planning Tool (HAPT). Units Already Built: City of Spokane, Acella Data 2021 to 2024. Capacity for Additional Growth = Land Capacity Analysis for the City of Spokane, 2025.*

Notes: *RESULTS row represents the following calculation: (Units Already Built + Remaining Capacity) - New Units Needed. A negative number denotes a lack of sufficient capacity in that affordability bracket to accommodate the need identified by the State.*

I. Introduction

In 2021 the Washington State Legislature passed new legislation seeking to remedy the State's ongoing housing crisis. Described as a bill "supporting emergency shelters and housing through local planning and development regulations," House Bill 1220 (HB1220) was passed on April 14, 2021. Among other changes, HB1220 expanded the requirement for Cities and Counties planning under the Growth Management Act (GMA) to plan for and accommodate housing within their borders when conducting major updates to their comprehensive plan.

Prior to HB1220, Cities and Counties were only required to quantify and accommodate their total 20-year housing unit need. HB1220 expanded that requirement, calling on jurisdictions to consider and plan for housing units broken down by various affordability brackets, based on Area Median Income (AMI). Accordingly, the Washington Department of Commerce (Commerce) provided the Housing Allocation Planning Tool (HAPT) and various guidance documents to help jurisdictions meet the new requirements.

The following analysis conforms largely to the guidance provided by Commerce, primarily Commerce publications Establishing Housing Targets for your Community (Book 1) and Guidance for Updating your Housing Element (Book 2). While HB1220 also included the requirement that the City consider racially disparate impacts and displacement, those topics will be addressed in a separate study underway by the City of Spokane and are not explored in detail here. Additionally, HB1220 requires that City quantify their ability to accommodate emergency housing—a topic which will be addressed in a separate report from this one.

II. Report Preparation

The following report was prepared by the Planning & Economic Development department at the City of Spokane, utilizing the following staff:

Project Manager & Chief Analyst:	Kevin Freibott, Senior Planner
Planning Director:	Spencer Gardner, AICP
Deputy Planning Director:	Tirrell Black, AICP
Economic Development:	Amanda Beck, Planner II

This report is a follow-up to the City's Land Capacity Analysis (LCA), adopted earlier in 2025. Readers are referred to that document for greater detail as to the available lands within the City and the development potential therein.

III. Defined Terms

Prior to discussing the housing allocation and the City's capacity to accommodate those units, it's important to understand several key terms used by Commerce, the HAPT, and mentioned in GMA and HB1220. Those terms are as follows:

Area Median Income (AMI): The HAPT describes housing affordability by AMI, specifically as a percentage of the Spokane County AMI. AMI is established by the United States Department of Housing and Urban Development (HUD) and is updated annually for the use of housing providers and local government. HUD sets the AMI for the entire Spokane metropolitan area, not for cities specifically. For financial year 2025, HUD states the AMI for the Spokane area is $100,800. Commensurately, a household making $100,800 annually in Spokane would be a 100%AMI household. Conversely, a household with an annual income of $50,400 would be in the 50%AMI bracket.

Permanent Housing: Permanent housing units provide permanent residence, whether or not those units are provided along with supporting services. A housing unit can be any type of unit, be it a standalone house, apartment, condo, middle housing, or some other type of housing. For the purposes of this analysis, group housing is not considered as part of the permanent housing number, commensurate with HB1220 requirements.

Permanently Supportive Housing (PSH): PSH units are subsidized housing units with no limit on the length of stay, prioritizing housing for people who require comprehensive support services to retain tenancy. Generally, PSH 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 either was experiencing homelessness or was at imminent risk of homelessness prior to moving into housing. Simplified, PSH provides both housing *and* support to help prevent those in PSH from entering or returning to homelessness. PSH is quantified in the HAPT by unit.

IV. Housing Affordability Brackets

The analysis required by HB1220 and GMA calls for the City to quantify and account for new housing in several affordability ranges, or brackets, based on AMI. The brackets are based on AMI, set by HUD, and represent a range of household incomes in the extremely-low-, very-low-, low-, and moderate-income ranges. Also included are higher incomes greater than the AMI, such as 120% AMI, but legislation has fewer requirements for planning for these housing types.

By calculating income as a percentage of AMI, the range of household incomes in each bracket can be determined. This is complicated somewhat by the fact that AMI changes by household size, rising as the number of people in the household rises. While most agencies and jurisdictions rely on the 4-person number, Commerce allows for jurisdictions to make adjustments according to local average household size.

The following table (**Figure 2**) provides the current AMI brackets, based on the region's median family income of $100,800. The table includes both the 3-person income limits and the 4-person income limits. While 4-person family limits are most often cited when discussing AMI, the current average household size in the City of Spokane is closer to 3-persons[1]. Per Commerce Guidance, when this is true the jurisdiction can consider home affordability by using the 3-person limit instead[2]. Accordingly, the analysis in this report will do so.

Figure 2: Income Brackets in Spokane County (2025)

Affordability Bracket	%AMI	3-Person Family Income Range (Annual)	4-Person Family Income Range (Annual)
Extremely Low Income	0-30% AMI	$0 - $27,250	$0 - $30,240
Very Low-Income	30-50% AMI	$27,251 - $45,400	$30,241 - $50,400
Low Income	50-80% AMI	$45,401 - $72,600	$50,401 - $80,640
Moderate Income	80-100% AMI	$72,601 - $90,720	$80,641 - $100,800
High Income	100-120% AMI	$90,721 - $108,864	$100,801 - $120,960
Highest Income	120% + AMI	$108,865 and up	$120,961 and up

***Source**: 2025 Income Limits Documentation System, United State Housing and Urban Development Department (HUD). Retrieved online at www.huduser.gov.*
***Notes**: Calculations of income range, maximum annual housing cost, and maximum monthly housing cost made by City staff from HUD income limits.*

The Commerce guidance directs Jurisdictions towards assuming that a household should expect 30 percent of its income to go towards housing costs. Incidentally, this is the threshold for "cost burdened" households used by the State and most local jurisdictions. Those households that pay more than 30 percent of their monthly income towards housing costs are considered "cost burdened."

In order to analyze the relationship between rents in the City of Spokane and the income brackets offered by AMI, first the appropriate maximum monthly housing cost for each bracket must be calculated. Converting annual income to determine what comprises 30 percent of the monthly income requires a simple calculation:

Maximum Monthly Housing Cost = Annual Income / 12 * 0.30

However, an additional calculation must be made because housing cost, when considered by Commerce and the state, includes monthly utility costs in addition to rent or mortgage payments. The amount to subtract from housing cost for utilities is informed on a county by county basis by local housing authorities. In the case of Spokane County, the Spokane Housing Authority publishes worksheets for the allowances for certain household utilities. Spokane Housing Authority's most current utility allowances are provided by housing type and the utilities involved (e.g. whether they be gas or electric, forced air or furnace). By using the most common utility types in Spokane, the following utility allowances can be assumed (see **Figure 3**).

Accordingly, the amounts in **Figure 3** should be incorporated into the maximum monthly housing cost calculation by subtracting them from the total. For the purposes

[1] 2.35 according to the US Census American Communities Survey, 2023 5-year Average.
[2] See p. 35 of Guidance for Updating Your Housing Element by the Department of Commerce, August, 2023.

Figure 3: Utility Allowances by Unit Type and Number of Bedrooms, Spokane County

Unit Type	0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	5 Bedroom
High-Rise/Apartment	$206	$213	$227	$243	$259	$282
Middle Housing & Low Rise	$216	$224	$243	$263	$282	$300
Single-Unit, Duplex, Mobile Home	$232	$244	$263	$283	$304	$323
AVERAGE VALUE	**$218**	**$227**	**$244**	**$263**	**$282**	**$302**

Source: *Spokane Housing Authority, February 2025.*

Notes: *Assumes electric heating, electric cooking, and electric water heating, indicated by the source as the most common condition. The average value is a calculated value of the average of the values in the three unit types. It is not provided by Spokane Housing Authority.*

of this analysis, and consistent with the overall assumption of 3 persons per unit, this analysis will apply 2 bedroom average value of $244. This results in the following calculation for maximum monthly rent or mortgage payment:

Maximum Monthly Housing Cost = Annual Income / 12 * 0.30 - $244

By applying this formula, the maximum monthly housing cost for each affordability bracket result can be determined, as shown in **Figure 4** below. Note that the analysis in this report will utilize the three-person household data as discussed previously.

Figure 4: Rent/Mortgage Payment Limits in Spokane County

			Persons Per Household			
AMI Bracket	One	Two	Three	Four	Five	Six
30% AMI	$312	$378	$437	$559	$678	$797
50% AMI	$665	$782	$891	$1,016	$1,098	$1,181
80% AMI	$1,195	$1,387	$1,571	$1,772	$1,916	$2,058
100% AMI	$1,546	$1,789	$2,024	$2,276	$2,459	$2,642
120% AMI	$2,192	$2,477	$2,780	$3,003	$3,226	$3,448

Source: *Calculated values based on method in text.*

Notes: *Assumes 30 percent of monthly income calculated from annual Area Median Income, minus utility allowances.*

V. The Housing Allocation Planning Tool (HAPT)

Commerce has provided a complex set of tools for Counties and Jurisdictions to utilize when determining their housing unit growth allocation through the planning horizon. This tool, known as HAPT, provides the countywide housing allocation based on the planning horizon and the County's overall population growth, as well as individualized jurisdiction housing growth based upon the share of the County's growth each jurisdiction expected to accommodate.

In the case of the Spokane County numbers, the County has adopted the middle housing forecast from OFM. This forecast is the most statistically supported option and provides for growth of 100,065 persons in the County by 2046. By using the regionally adopted projections, the entire county's allocation is provided (see **Figure 5** below).

Figure 5: Countywide Housing Growth Allocation–Cities Included

	TOTAL	Permanent Housing Needs by Income Level in Housing Units (as % of Area Median Income)						
		0-30%AMI						
		Non-PSH	PSH	30-50%AMI	50-80%AMI	80-100%AMI	100-120%AMI	>120%AMI
Current Estimated Housing	221,840	6,613	937	34,798	91,803	32,035	20,981	34,673
New Housing by 2046	297,024	26,518	6,651	48,418	100,647	36,807	24,918	53,065
Additional Units Needed	**75,184**	**19,905**	**5,714**	**13,620**	**8,844**	**7,772**	**3,937**	**18,392**

***Source**: Spokane County HAPT, January 2025.*

***Notes**: AMI = Area Median Income, as set by the United State Housing and Urban Development Department (HUD). Current AMI is for FY2025.*

Once countywide need is determined, HAPT divides up countywide growth by a number of possible methods. Spokane County and the Cities within it have chosen to use "Method C" in HAPT, as it provides for both a statistical division of the overall growth shown in **Figure 5**, but also accounts for housing need outside cities but within the Urban Growth Area (UGA). See **Appendix A** for more information on this method.

HAPT requires that Counties apportion housing need among the Cities as a percentage of regional housing growth each jurisdiction expects to accommodate. Ultimately, the region agreed on a method to convert projected population share into housing share, which was then input into HAPT (see **Appendix A**). Regarding the City of Spokane, while the city is expected to experience 23.34% of population growth, the City's housing need represents 29.74% of the countywide housing growth. This is commensurate with recent development in Spokane that has exceeded 1,300 units annually since the recovery from COVID. By inputting 29.74 percent of countywide housing growth for the city into HAPT, the tool provides the following housing need in the city shown in **Figure 6** below.

Figure 6: City of Spokane Housing Growth Allocation (2020 to 2046)

	TOTAL	Permanent Housing Needs by Income Level (as % of Area Median Income)						
		0-30%AMI						
		Non-PSH	PSH	30-50%AMI	50-80%AMI	80-100%AMI	100-120%AMI	>120%AMI
Estimated Current Housing	99,938	3,534	937	19,479	47,090	11,873	7,118	9,907
Additional Units Needed	**22,359**	**6,452**	**1,851**	**4,413**	**2,631**	**1,418**	**1,170**	**4,424**

***Source**: Spokane County HAPT, January 2025.*

***Notes**: AMI = Area Median Income, as set by the United State Housing and Urban Development Department (HUD). Current AMI is for FY2025.*

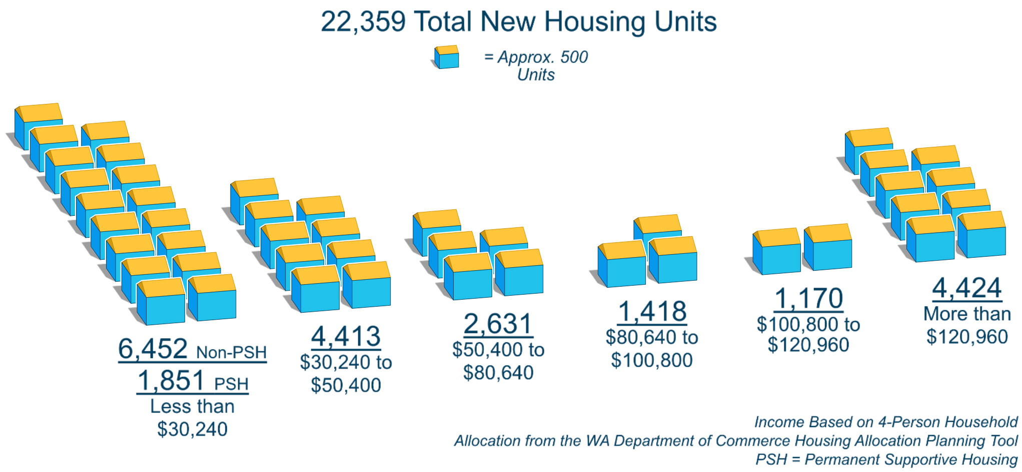
As shown above, the City is expected to require 22,359 additional permanent housing units between 2020 and 2046. While those units are spread among all the affordability brackets, that spread is not equal bracket to bracket. **Figure 7** on the following page provides a graphical depiction of that need by bracket.

A Note On Housing Units Versus Population Growth

The city is expected to grow by 23,357 people between 2020 and 2046[3]. Compared to a housing need of 22,359 homes (**Figure 6**) the two projections would seem incongruous,

[3] *Land Capacity Analysis for the City of Spokane, 2025.*

Figure 7: City of Spokane New Housing Need by Household Income (2020-2046)



***Source**: Spokane County HAPT, January 2025.*

***Notes**: Income limits provided by United State Housing and Urban Development Department, FY2025 Income Limits Documentation System, retrieved online at www.huduser.gov.*

as if the HAPT was assuming that most new residents will live alone in their home. This is not the case, however, as HAPT provides for more than the housing units needed to accommodate new population growth.

Per the Commerce guidance on the HAPT, the allocation accounts for three areas of housing need, as follows:

- **New Growth**. The housing units to accommodate new population growth in the city between 2020 and 2046. The proportion of new housing in the HAPT corresponding to this need is approximately 60 percent of the total.
- **Underproduction**. In its study of housing needs and production in Washington, Commerce identified that, overall, the state had under-produced housing by a significant degree. This was largely due to COVID and other economic factors outside the control of Cities and Counties, but the need is there regardless. To remedy this situation, 30 percent of the HAPT housing allocation is included to address issues with overpriced housing and historic underproduction. As a result, approximately 30 percent of the HAPT allocation addresses the housing needs of people who are already residing in Spokane.
- **Homelessness**. A small percentage of the overall HAPT allocation, approximately 10 percent, is intended to address the need of those experiencing homelessness or in danger of imminent homelessness. As with underproduction, much of this need is for people already in Spokane, not new growth.

While the City of Spokane has been allocated 22,359 units between 2020 and 2046, only about 13,415 of those units are to accommodate new residents. Regardless, HB1220 states that the City must have enough capacity to accommodate the *entire* allocation, thus this analysis in this report concerns the full number of units allocated (see **Figure 6**).

A Note on Housing Affordability Brackets and Grouping

While HAPT provides for housing need in seven brackets (see **Figure 6**), difficulties arise in providing such a high level of differentiation in housing data. It is near impossible to divide housing costs into so many brackets due to the limited number of zoning types and the high number of variables involved. As such, most jurisdictions have decided to group the affordability brackets into the following three groups:

- **0-80% AMI** – The highest need bracket, requiring the most program/funding support.
- **80%-120% AMI** - The middle bracket, where some support is necessary, but some market-rate development may occur as well. Some organizations label this group as “workforce housing.”
- **120%+AMI** – The highest cost group, often called “market rate” housing. Commerce’s guidance assumes little to no support for these householders.

Not only are jurisdictions using these three groupings, but the example tables and calculations in Commerce’s own guidance group affordability thus. Accordingly, the City of Spokane analysis will use the same groups.

VI. Determining Affordability Bracket by Geographic Location

As demonstrated above, the HAPT indicates the City must accommodate 22,359 additional housing units between 2020 and 2046. To determine what capacity exists in the city to accommodate those units, Commerce provides specific guidelines in their “Guidance for Updating Your Housing Element,” published August 2023. This guidance directs jurisdictions to consider their zoning and which housing types might be assumed in those zones. Additionally, the guidance from Commerce directs jurisdictions to use multiple data sources to determine what affordability can be expected from various housing types. The following analysis conforms substantially to the Commerce guidance.

Using Zoning to Inform Housing Affordability

The Commerce guidance indicates that jurisdictions should compare the housing types allowed in individual zones to inform what level of affordability might be expected in given areas. To this end, the City analyzed all zones in which housing is allowed and compared the housing types and densities assumed for each, as shown in **Figure 8** on the following page.

The City of Spokane is somewhat unusual, in that the municipal code allows for the development of residential uses in *all* zones except industrial zones. Additionally, most housing types (single-unit and middle housing) are allowed everywhere. Save for the lower density residential zones (RA, R1, and R2), multi-unit housing is allowed in every zone. This makes it difficult to impossible to differentiate housing development in the city only by considering zoning.

Figure 8: Zoning Classified by Housing Type and Maximum Density

Zone	Housing Types Allowed	Maximum Density Allowed	Assumed Density	Density Group
RA	Single-Unit and Middle Housing	10 (approximate)	5-9 du/ac	Residential Low
R1		10 (approximate)		
R2	Middle Housing	20 (approximate)		
RMF	Middle Housing & Multi-Unit	30 (approximate)	29 du/ac	Residential High
RHD		No Limit		
NR	Middle Housing & Multi-Unit	No Limit	30.2 du/ac in 33% of the Area	Non-Residential
CB				
GC				
O				
OR				
CC#				
CA1				
DTC	Middle Housing & Multi-Unit	No Limit	44.4 du/ac in 33% of the area	Downtown
DTG				
DTU				
DTS				

***Source**: Spokane Municipal Code, SMC Title 17; Shaping Spokane, the Spokane Comprehensive Plan (Chapter 3); Land Capacity Analysis for the City of Spokane (2025).*

***Notes**: Maximum density is approximate in residential zones due to the fact that lots under 2 acres are not restricted by density–rather the SMC uses height and setbacks to control for density in these zones. Assumed Density and Density Group conform to the City's Land Capacity Analysis, adopted March 10, 2025, via resolution RES 2025-0015.*

Further complicating matters, the City does not have sufficient data to correlate housing type with housing affordability as suggested by the Department of Commerce. This is not a failure by the City, rather the requirement to track such data did not exist historically, so these values weren't collected. To remedy this, the Commerce guidance provides for the option for Cities to augment and adjust affordability assumptions using publicly available market data.[4]

Sources for Housing Affordability for Rentals and Purchases

Cities, Spokane included, often do not track the affordability of a given housing unit when permitting its construction. Accordingly, the City has limited internal sources that might indicate at what level of affordability housing development is occurring. As a result, the City must look outside it's own data for this information.

Per the suggestion in the Commerce guidance, the City has utilized data from multiple sources to determine housing affordability by type, including the following:

- Home Value (purchases) by neighborhood provided by Zillow.com. Zillow provides a combination of self-reported and industry information on home purchases, assembling that data into 'neighborhoods' that generally conform to certain parts of the city.

[4] *See p. 32 of Guidance for Updating Your Housing Element by the Department of Commerce, August, 2023.*

- **Home Value (purchases) by neighborhood provided by Redfin.com**. Redfin is similar to Zillow, but follows a more industry-based approach for home value, lessening the impact of individual self-reported home values skewing the results. As with Zillow, Redfin data can be divided up roughly by neighborhood.
- **Median Rents by neighborhood provided by Apartments.com.** Like with Zillow but in this case concerning rentals, Apartments.com is somewhat weighted by self-reporting while also accounting for historic data related to past listings that may not currently be open for rent.
- **Median rents by neighborhood provided by Rentcafe.com**. Similar to Redfin, RentCafe's data is backed up by industry information in addition to current active listings. RentCafe also directly contacts management companies and real estate professionals to augment their data with additional confirmation.

Rent/Purchase Price by Affordability Bracket

Before a comparison can be made between median house price and monthly housing costs, the home price must be converted to an assumed mortgage payment. Following the Commerce guidance, the City utilized the Fannie Mae mortgage calculator to determine what the approximate monthly mortgage payment might be for home purchases in the City. The Fannie Mae mortgage calculator[5] requires the user to input various assumed factors that affect the payment amount. The factors used for this analysis were the most common factors reported by Realtor.com for home purchases in Spokane County, namely:

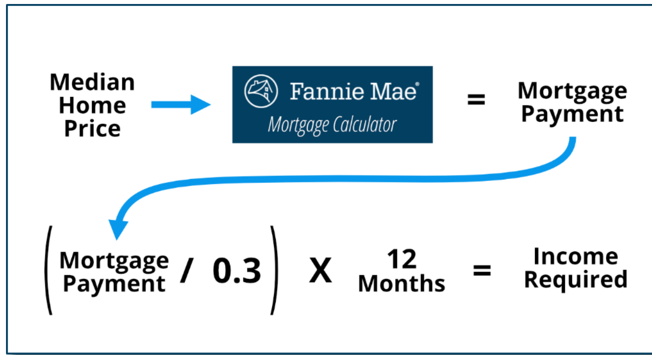
- 5 percent down payment;
- 30-year fixed rate loan; and
- 6.8% interest.

Plugging those factors into the Fannie Mae mortgage calculator returned a monthly payment for each neighborhood's median home price. That monthly value was then converted into the annual income necessary to maintain such a payment amount. For this, the Commerce assumption that 30 percent of annual income as the maximum that should go to home payments/rents was assumed. The calculation shown in **Figure 9** on the following page provided the income required for a given median home price.

The same base calculation was used to determine the income required for rentals, using the median rents provided by Apartments.com or RentCafe. Since those sources provide rents in a monthly form to begin with, the first step (using a mortgage calculator) was not necessary. Income required for a given median rent was calculated by dividing by 0.3 and multiplying by 12 only.

[5] *https://yourhome.fanniemae.com/calculators-tools/mortgage-calculator*

Figure 9: Process for Calculating Income from Median Home Price



***Source**: City of Spokane, based on WA Department of Commerce, "Guidance for Updating your Housing Element" (August 2023).*

***Notes**: Fannie Mae mortgage calculator assumed a 5 percent down payment, 30-year fixed rate mortgage, and 6.8% interest, as averages provided by Realtor.com for Spokane County.*

Utilizing the calculations above, an affordability bracket can be assumed for each part of the City for both median home price (purchases) and median rent (rentals). As an example calculation for rental units, the following sample calculation utilizes the RentCafe reported average rent for the Cliff-Cannon neighborhood:

1. Average Rent = $1,521
2. Assuming 30% of Income for Rent (Rent / 0.3) = $5,070
3. Multiplied by 12 to convert from monthly to annual: $60,840

Because $60,840 falls within the 0-80%AMI bracket (see **Figure 2**), we can assume that rental units in the Cliff-Cannon neighborhood generally fall within that bracket. By using this same calculation for both sources of rental data (Apartments.com and RentCafe) the affordability bracket for each area in the city can be determined, as shown in **Figure 10** and **Figure 11** on following pages.

As an example calculation for units for purchase, the following sample uses the Zillow.com reported median home value in the Northwest Neighborhood:

1. Median Home Value = $346,592
2. Mortgage Payment (Fannie Mae) = $2,966
3. Assuming 30% of Income for Mortgage (Payment / 0.3) = $9,887 a month
4. Multiplied by 12 to convert from monthly to annual = $118,640

Because $118,640 falls within the 120+%AMI bracket (**Figure 2)**, we can assume that homes for purchase in the Northwest Neighborhood generally fall within that bracket. By using this method for both sources for sales data (Zillow and Redfin) the affordability bracket for each area can be determined, as shown in **Figure 12** and **Figure 13**.

Summary tables showing the calculations above for all four sources and all areas of the city are included at the end of this report. See **Appendix B** for more details.

Figure 10: Rent Affordability by Approximate Location (Apartments.com)

***Source**: Apartments.com, data from May 2025.*

***Notes**: Areas used by the source do not necessarily match neighborhood boundaries, as shown. The source had no data for blank areas.*

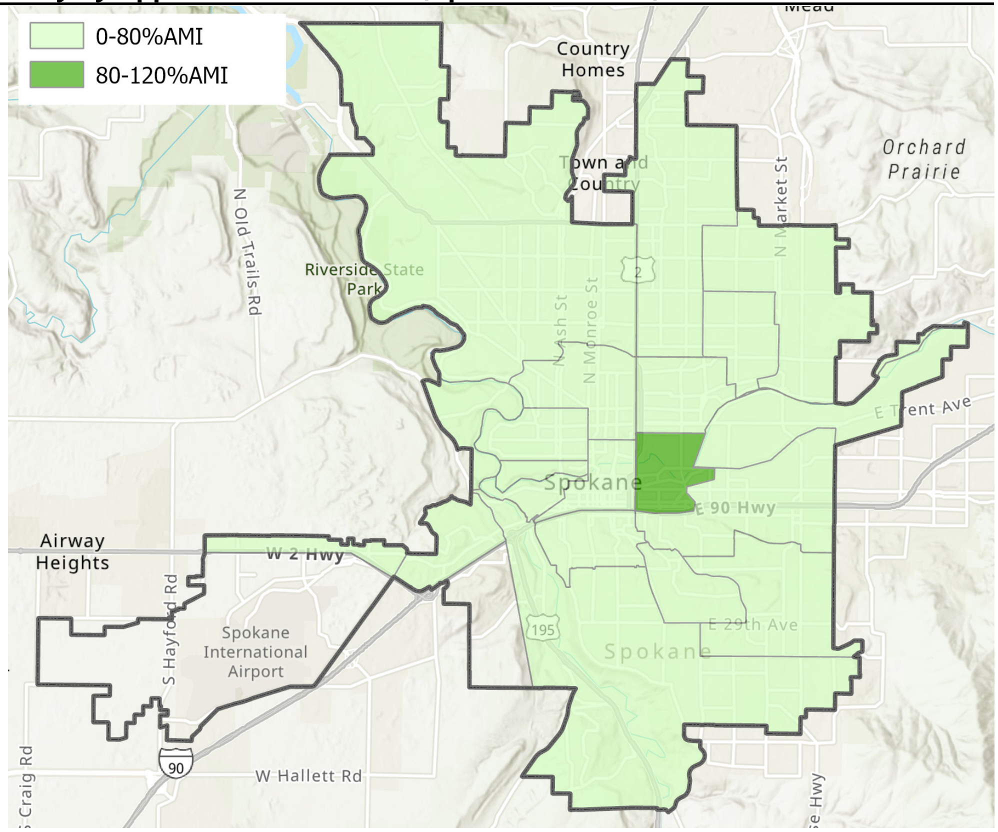


Figure 11: Rent Affordability by Approximate Location (Rentcafe.com)

***Source**: Rentcafe.com, data from May 2025.*

***Notes**: Areas used by the source do not necessarily match neighborhood boundaries, as shown. The blank area contains zero housing units, thus it is not shown here.*

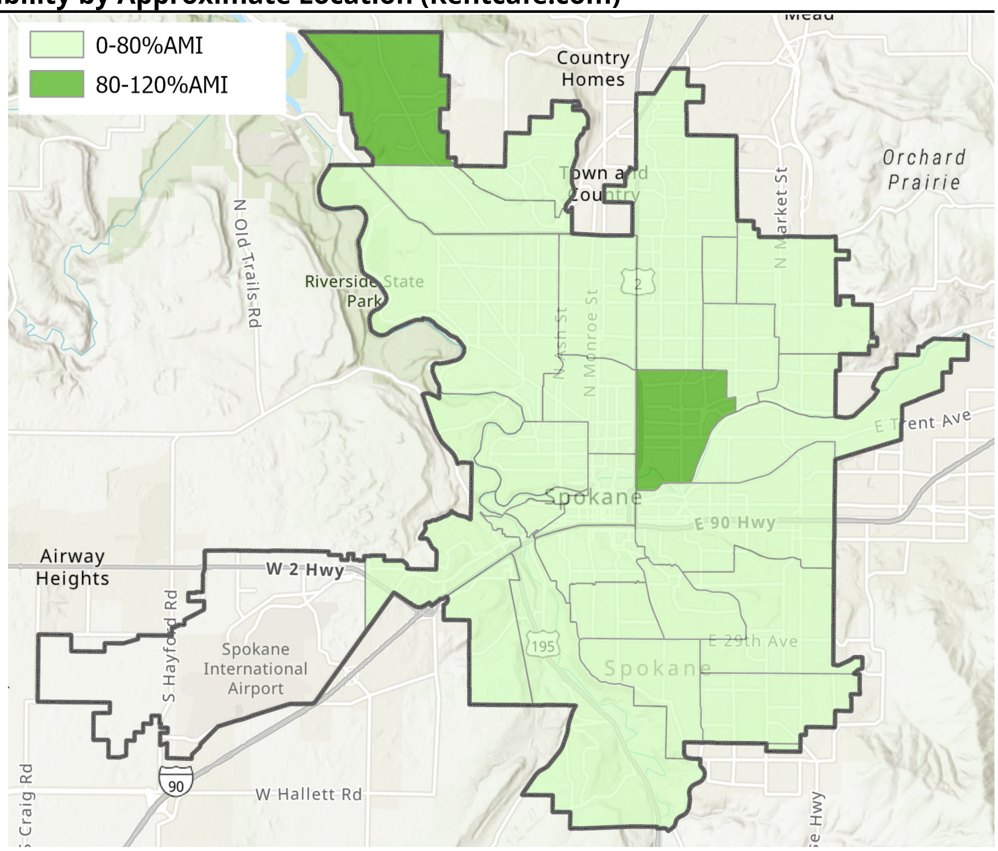


Figure 12: Home Value Affordability by Approximate Location (Zillow.com)

Source: Zillow.com, data from May 2025.

Notes: The source had no data for blank areas. Areas used by the source do not necessarily match neighborhood boundaries, as shown.

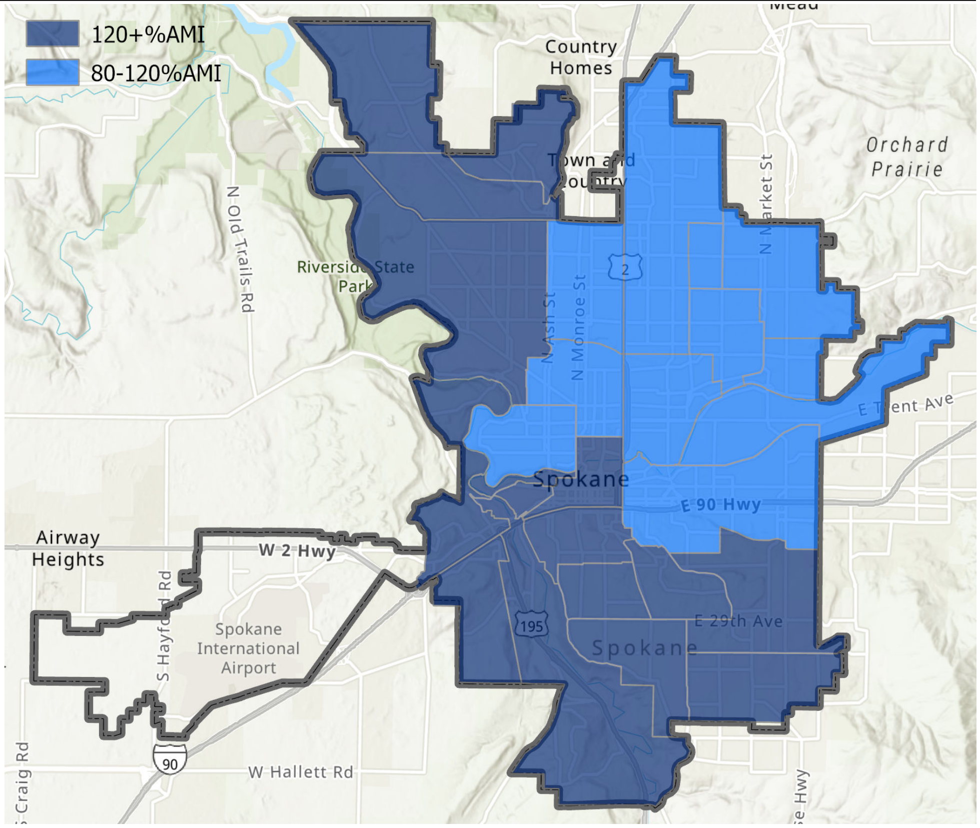
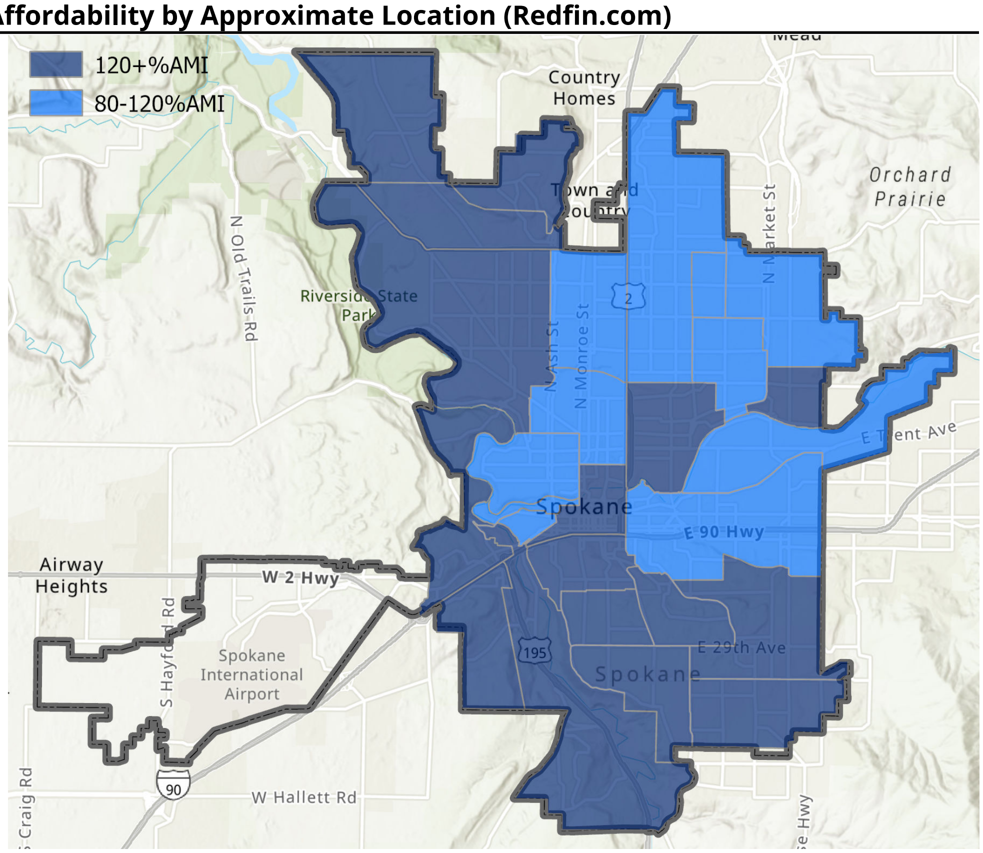


Figure 13: Home Value Affordability by Approximate Location (Redfin.com)

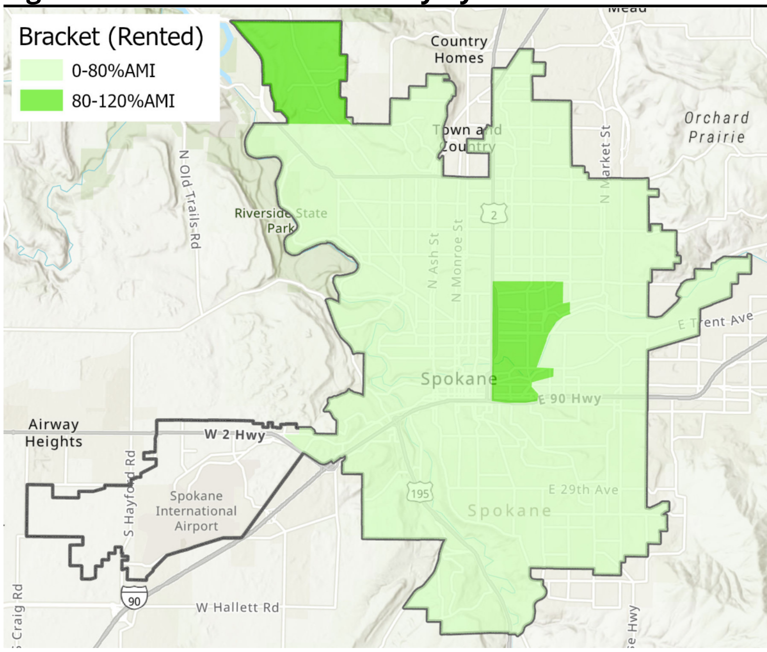
Source*: Redfin.com, data from May 2025.*

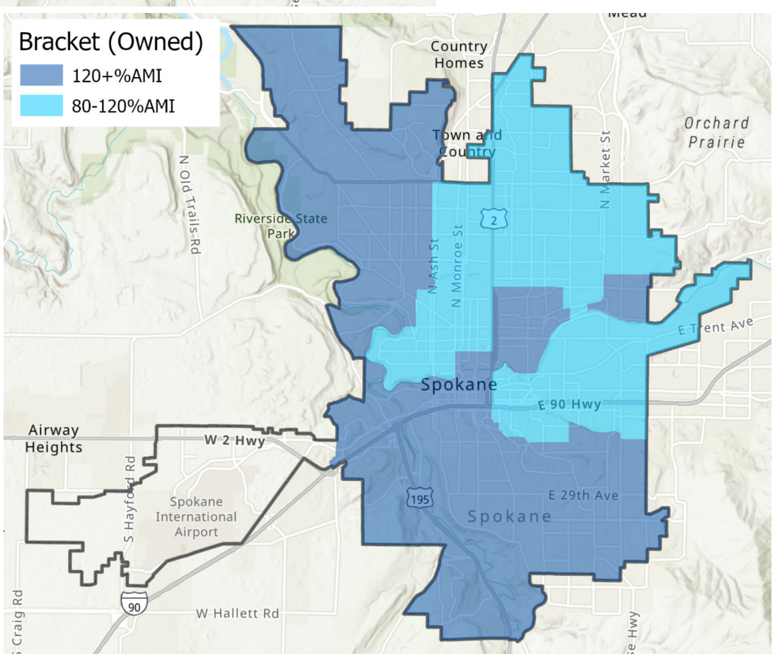
Notes*: The source had no data for blank areas.Areas used by the source do not necessarily match neighborhood boundaries, as shown.*



By comparing and combining the four maps above, general affordability assumptions can be made for both rental and purchase homes by location in the City, as shown in **Figure 14**. These assumptions were used by this analysis to assign assumed affordability to either rental units or homes for purchase in each part of the City.

Figure 14: Assumed Affordability by Location–Rentals and Purchases





***Source**: City of Spokane, Synthesized from multiple sources.*

As shown above, rented units in the City generally fall within the 0-80%AMI bracket, though two smaller areas tend to be more expensive, falling within the 80-120%AMI bracket. The picture for housing units for purchase is more complex, with a somewhat even split between areas exhibiting 80-120%AMI units and areas in the 120+%AMI bracket. By determining affordability by geography in this way, the analysis can be more nuanced as to the expected affordability of new units in the City over the next twenty years. Many jurisdictions can consider their affordability for the entire City, but the great size of Spokane (nearly 70 square miles) points to the need for a more refines analysis than simply one value for the entire city. The approach outlined above grants that higher level of detail.

Determining Housing Tenure

Now that the areas of the City in which certain affordability brackets can be assumed has been established, the only remaining step is to determine which new units might be for rent and which might be for purchase. Of note, it is inaccurate to assume that all detached homes are for purchase, as the rental house market in Spokane is rather robust.

To determine the split of rented and purchase units expected in the city, this analysis utilized data from the American Communities Survey (ACS) 5-year average reports from 2023. ACS provides sample-based data to fill in between the decennial censuses, providing a relatively reliable data source for tenure (owned versus rented).

By polling ACS data, the City determined the mix of owned and rented homes in each Census Tract, resulting in the maps on the following pages (**Figure 15** and **Figure 16**). By utilizing the ratio of rented to owned homes in each tract, any capacity for new housing development in those tracts can be split accordingly into assumed rental units and units for purchase. For instance, assume a given Census Tract exhibits 60% owned and 40% rented units. That same Tract, say, shows an expected affordability of 80-120%AMI for rental units and 120%+AMI for purchased units (per Figure 14). If that tract has capacity for 100 units, 40 of those units could be assumed to be rented in the 80-120%AMI bracket and 60 units could be assumed to be sold in the 120+%AMI bracket. This is precisely the calculation used to determine final capacity in this report.

V. Unit Capacity by Affordability Bracket

The Commerce guidance states that once a jurisdiction has determined the affordability of various housing types, zones, and locations, then the unit capacity in those areas should be incorporated into the analysis . As the City has completed its LCA[6], that analysis provides a theoretical unit capacity in various locations throughout the city. Per Commerce's guidance, the unit capacity from the LCA was used in this analysis.

Because the LCA provides for potential units of capacity by geographic location within the city, each unit of capacity in the LCA can be compared to the tenure assumptions shown in **Figures 15 and 16**, producing an assumed number of rented units and owned units of capacity in each Census tract. For example, if the LCA found that 100 units of capacity exist in a tract of 60 percent owned and 40 percent rented homes, this analysis assumes that 60 units of capacity would be owned and 40 units of capacity would be rented.

[6] *Land Capacity Analysis for the City of Spokane, adopted March 10, 2025, via resolution RES 2025-0015.*

Figure 15: Percent of Rented Homes by Census Tract (All Housing Types)

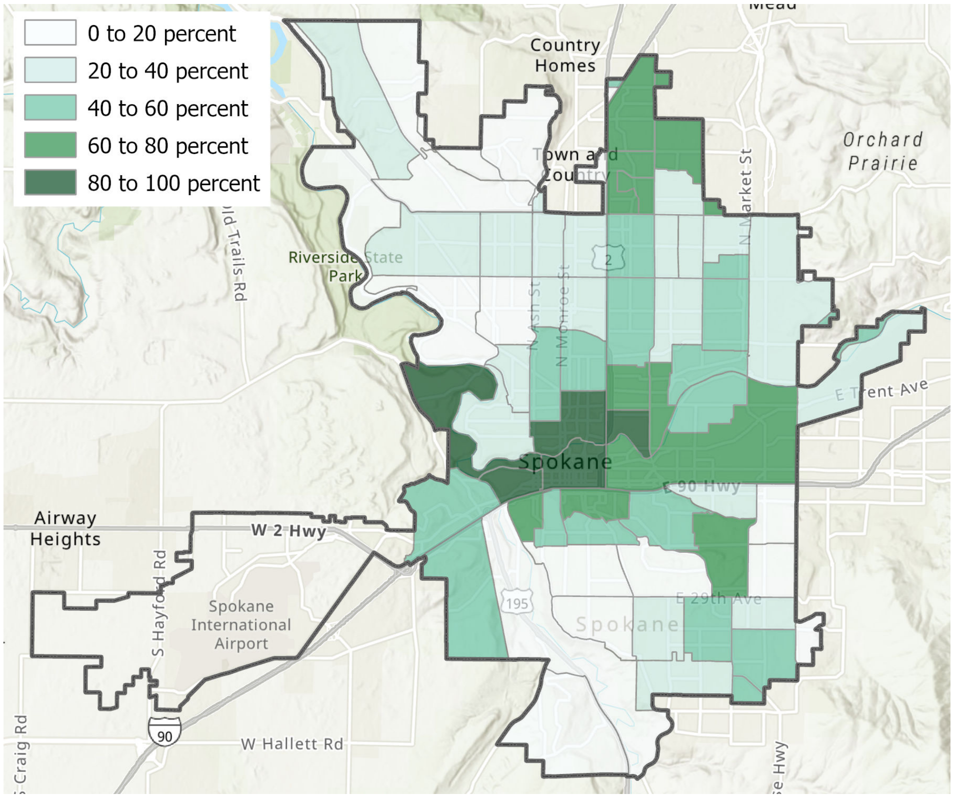
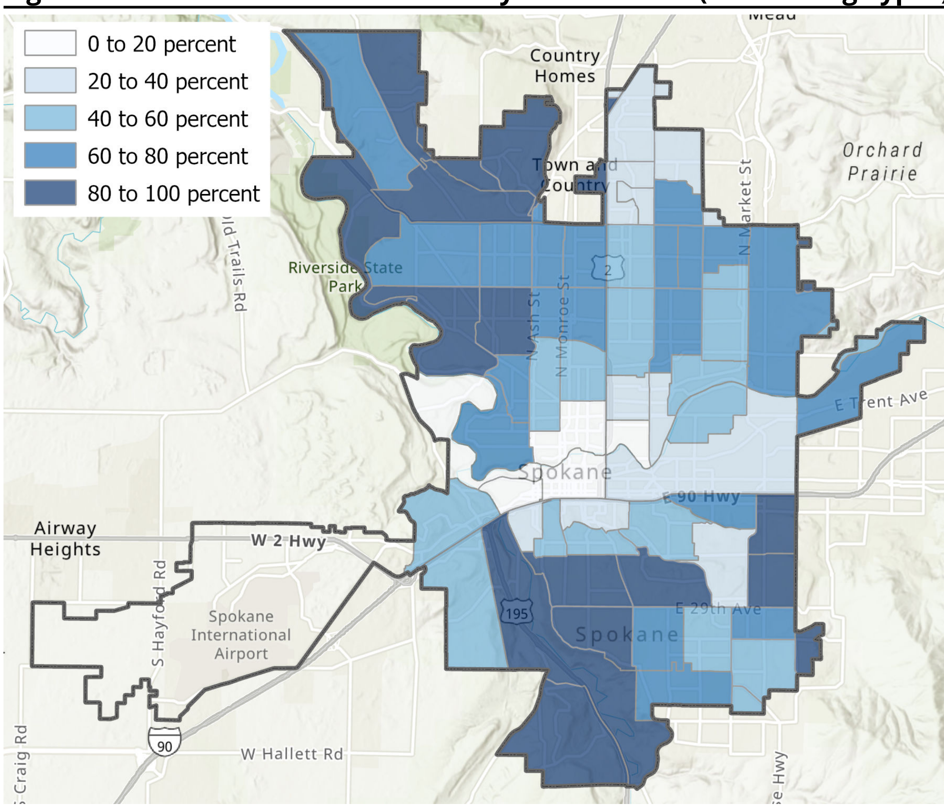


Figure 16: Percent of Owned Homes by Census Tract (All Housing Types)



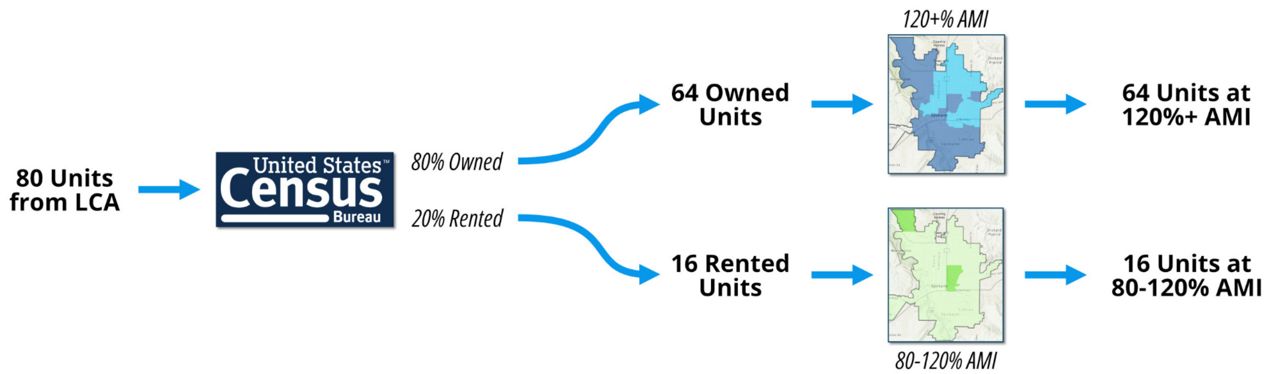
***Source (Both)**: US Census Bureau, American Communities Survey, 2023 5-Year Average*

***Note (Both):** Areas around the Spokane International Airport are blank due to a lack of any housing in this area.*

Once the assumptions for tenure (owned versus rented) are applied to units of capacity in the LCA, the affordability of those units can be inferred by comparing the location to the affordability in **Figure 14**. A schematic example of this calculation is shown below (**Figure 17**).

Figure 17: Example Affordability Calculation–LCA to Affordability Bracket

Assumptions: 80 units of capacity in a tract with 80% ownership, rental units in the 80-120% AMI bracket, and ownership units in the 120+% AMI bracket.



Special Cases in the Land Capacity Analysis

The LCA considers two special areas in its analysis, those of adopted Planned Unit Developments (PUDs) that have not yet completed platting all lots, and the South Logan Transit Oriented Development (South Logan TOD) subarea analysis. Readers are referred to the LCA itself for details on how these areas were handled in the LCA.

Following the process in the LCA, the analysis of affordability herein considers the PUDs and South Logan TOD area separately as well. This is for the same reason—a greater level of specificity is known about the development potential in these areas. Regarding the PUDs, these typically involve either single-unit homes or multi-unit buildings as part of a larger planned development with (generally) higher costs for residents, both rented or purchased. Accordingly, for any units of capacity within PUDs the analysis in this report assumes those units to occur at the more costly affordability bracket—namely 80-120% AMI for rental units and 120+% AMI for purchased homes. Additionally, most PUDs include covenants that restrict the renting of homes within PUDs. As a result, this analysis assumes that 100 percent of single unit homes in PUDs will be for purchase. Likewise, all multi-unit potential in PUDs is assumed to be for rent.

When considering the South Logan TOD area, the project area located in a part of the City with the least affordable brackets in both rentals and purchase homes. Accordingly, all units in the South Logan TOD area are assumed by this analysis to be in the 120+% AMI bracket for purchase and the 80-120%AMI bracket for rentals.

VI. Housing Unit Development Since 2020

The housing allocation provided by Commerce via the HAPT establishes need between the years 2020 and 2046. Because development has continued since 2020 and the unity capacity presented by the LCA is for 2025, housing units built between 2020 and 2025 should be accounted for. In essence, any unit constructed between 2021 and now would reduce the overall need identified by the HAPT.

To do this, all residential permits issued between January 1, 2021 and December 31, 2024 were pulled from the City's permit database. All completed units–-those issued a Certificate of Occupancy or indicating a successful final inspection–were geo-located and compared to the affordability assumptions in Figure 14, resulting in a tabulated number of completed units in each of the affordability brackets. These units were then subtracted from the "new" units called for in HAPT. This number of completed units is included in the final table of this report (see below).

VII. RESULTS: Housing Unit Capacity by Affordability Bracket

Overall, the LCA found that the City has sufficient theoretical capacity to accommodate slightly more than 30,000 dwelling units. By applying those units of capacity to the assumptions and calculations described in the sections above, those units are divided among the three affordability brackets as follows (see **Figure 18**):

According to this analysis, informed by and in compliance with the guidance of the

Figure 18: Final Results–City of Spokane Housing Unit Capacity by Affordability

	0-80%AMI Units	80-120%AMI Units	120+%AMI Units
Need (Commerce HAPT, 2020-2046)	15,347	2,588	4,424
Units Completed (2020-2024)	1,328	507	978
Capacity for Additional Growth (2025-2046)	**9,654**	**8,036**	**12,475**
Comparison RESULT	**-4,365**	**5,955**	**9,029**

Source: *Need = Department of Commerce Housing Allocation Planning Tool (HAPT). Completed Units: City of Spokane, Acella Data 2021 to 2024. Capacity for Additional Growth = Land Capacity Analysis for the City of Spokane, 2025, classified per the analysis outlined in this report.*

Notes: *Completed units represent those building permits issued by the City between January 1, 2021 and December 31, 2024, showing that either a certificate of occupancy was issued or a final inspection has been completed.*

Resulting unit capacity represents the result of the analysis and calculations described in this report.

Comparison represents the following calculation: (Completed Units + Unit Capacity) - Need = Comparison RESULT. A negative number denotes a lack of sufficient capacity in that affordability bracket to accommodate the need identified by HAPT.

Department of Commerce, **the City of Spokane does not currently contain sufficient capacity to accommodate needed growth in the 0-80%AMI bracket**. Concurrently, the City has excess capacity in both the 80-120% AMI bracket and the 120+% AMI bracket.

To comply with the requirements of House Bill 1220, the City must consider, as part of the overall Comprehensive Plan Periodic Update, actions sufficient to raise the capacity in the 0-80%AMI bracket by nearly 4,400 units. Those changes will likely be identified during the preparation of the Environmental Impact Statement for the Comprehensive Plan Update, as well as during preparation of the Update itself. For more information on these changes as they are developed, readers are encouraged to visit **www.planspokane.org**.

Appendix A:
Housing Allocation Planning Tool Documentation

Appendix to Accommodating Affordable Housing in the City of Spokane, 2025

NO. 25-0033

BEFORE THE BOARD OF COUNTY COMMISSIONERS
OF SPOKANE COUNTY, WASHINGTON

IN THE MATTER OF CONSIDERING THE SPOKANE COUNTY STEERING COMMITTEE OF ELECTED OFFICIALS (SCEO) RECOMMENDATION RELATED TO THE HOUSING FOR ALL PLANNING TOOL (HAPT) METHODOLOGY FOR HOUSING ALLOCATIONS	**RESOLUTION**

WHEREAS, pursuant to the provisions of RCW 36.32.120(6), the Board of County Commissioners of Spokane County, Washington, hereinafter referred to as the "Board," has the care of county property and the management of county funds and business; and

WHEREAS, pursuant to the provisions of Chapter 36.70.040 RCW, the Board has created a Planning Department, hereinafter referred to as the "Department," and a Planning Commission, hereinafter referred to as the "Commission" (Resolution No. 76-698 as amended by Resolution 23-0057); and

WHEREAS, pursuant to RCW 36. 70A.210, the Steering Committee of Elected Officials ("Steering Committee") was established by interlocal agreement (Resolution 1994-1686, and as amended thereafter from time to time) to assist in the development of the Countywide Planning Policies and perform other duties, including but not limited to providing recommendations to the Board of County Commissioners on the same; and

WHEREAS, the Planning Technical Advisory Committee (PTAC), consisting of technical staff from the various jurisdictions, is tasked with providing a report and recommendation to the Steering Committee on proposed amendments to the Countywide Planning Policies; and

WHEREAS, pursuant to the provisions of chapters 36.70 and 36.70A RCW, the Board adopted a Comprehensive Plan for Spokane County on November 5, 2001 (Board Resolutions 1-1059 and 1-1060), which has been thereafter amended from time to time; and

WHEREAS, pursuant to the provisions of chapters 36.70 and 36.70A RCW, the Board, on May 25, 2004, under Spokane County Resolution No. 04-0461, adopted a new Zoning Code to implement the goals and policies of the Comprehensive Plan, said regulation becoming effective June 1, 2004, which has been thereafter amended from time to time; and

WHEREAS, in accordance with RCW 36.70A.130, the county must review and update its comprehensive plan and development regulations every ten years, with the next update due by 2026; and

WHEREAS, SCEO held a public hearing on the proposed "A Prime" HAPT methodology on 9/25/24 and considered comments from the Planning Technical Advisory Committee (PTAC). No public comment or testimony in favor of or against the proposed methodology was received; and

WHEREAS, after deliberation, the Steering Committee unanimously recommended approval of the proposed Spokane County "A Prime" HAPT methodology for use in each constituent's 2026 comprehensive plans; and

WHEREAS, pursuant to RCW 36.70 A, the county and the cities within it must update their comprehensive

plans based on a countywide population for the 20-year planning period as projected by the Office of Financial Management; and

WHEREAS, as the regional government, the county is tasked with the adoption of the Countywide Planning Policies, a part of which includes the adoption of the Countywide Population Projection as well as sub-allocations of population to the cities within the county; and

WHEREAS, the Spokane County planning commission held workshops examining HAPT on 6/13/24 and 7/11/24; and

WHEREAS, SCEO held workshops examining HAPT on 5/15/24, 7/17/12 and 8/20/24; and

WHEREAS, the Board of County Commissioners received the SCEO recommendation on January 14th, 2025, and set January 21st, 2025, to consider the same; and

WHEREAS, at the January 21st, 2025, open public meeting the Board considered the recommendation of the SCEO, and the Department filed and voted on whether to adopt the same.

NOW THEREFORE BE IT RESOLVED, the Board herby adopts the "A Prime" HAPT methodology for the purpose of allocating housing units for the planning period of 2026- 2046.

PASSED AND ADOPTED this 21st day of January 2025.

BOARD OF COMMISSIONERS SPOKANE COUNTY SEAL SPOKANE COUNTY, WA

BOARD OF COUNTY COMMISSIONERS
OF SPOKANE COUNTY, WASHINGTON

ATTEST:

Ginna Vasquez

Ginna Vasquez, Clerk of the Board

Mary L. Kuney

Mary L. Kuney, Chair

Josh Kerns, Vice-Chair

Al French

Al French, Commissioner

Amber Waldref

Amber Waldref, Commissioner

Chris Jordan

Chris Jordan, Commissioner

MEMORANDUM

To:	Steering Committee of Elected Officials (SCEO)
From:	Planning Technical Advisory Committee (PTAC)
Via:	Spokane County Building and Planning
Date:	September 16, 2024
Re:	PTAC Recommendation, Housing for All Planning Tool methodology

Background Summary

Earlier this year, SCEO tasked PTAC with analyzing possible HAPT methodologies.

During this exploration, PTAC analyzed:

- Methods A and B
- Commerce's update of method A (A Prime), wherein the county's share is split between the unincorporated UGAs and rural areas.
- Custom methods created by other counties (Lewis, King, Skagit, and Snohomish)
    - Lewis, Skagit, and Snohomish's custom methodologies were found to be not applicable to Spokane County.
    - King County's custom methodology served as the basis for a Spokane County proposal that was brought before PTAC and SCEO.
- Two possible custom methods, including
    - Weighted transit
        - This methodology would have allocated low-income housing partially based on transit availability.
            - Was not carried forward, owing to a lack of support from PTAC.
    - Jobs to housing ratio
        - This methodology, based on King County's custom method, adjusts 0-50% allocations based on the ratio of low-income jobs (under $40,000) to low-income residents.
            - Was not carried forward, owing to a lack of support from PTAC.

Options Going Forward

SCEO has two options:

1. Adopt one of the base Commerce methodologies (A, A prime, or B).
    a. Adoption of A prime is recommended by PTAC.
2. Continue pursuing a custom methodology (method C).
    a. Any potential custom method will require clear guidance from SCEO on what changes are desired. There is no readily available data to accommodate such an exploration, so it would likely require a significant commitment of staff time.

Recommendation

PTAC recommends using HAPT Method A Prime. Method A Prime uses the same assumptions and calculations as Method A but allows for a distinction between rural County lands, unincorporated UGAs, and the incorporated jurisdictions. Additional details on this recommendation, along with the housing allocation numbers based on the current population allocation, can be found below.

Methodology Pros/Cons

Method	Pros	Cons
A	Equally distributes housing levels among jurisdictions, based on growth projections; Simplicity and clarity	Allocates low-income and emergency housing to rural areas
A Prime	Reserves lower-income housing for urban areas; Avoids placing emergency housing in rural areas	None identified by PTAC
B	Accounts for existing housing by allocating fewer units per income band to jurisdictions that have a larger share of housing in said income band than other jurisdictions	Allocates low-income and emergency housing to rural areas; creates negative housing allocations, the implications of which are not well understood.
C: Low-income jobs to low-income residents' ratio	Accounts for an additional piece of local analysis that factors in housing and employment locations, Identifying locations where lower wage jobs exist but not enough lower cost housing	What weight to give the analysis is unknown; Lack of support from jurisdictions; Concerns about the amount of time needed to perfect this methodology

Housing Allocation Numbers (Corrected)

	Method A Prime								
	Housing Allocation Income Bands								
	Total	0-30% AMI Non-PSH	0-30% AMI PSH	30-50%	50-80%	80-100%	100-120%	>120%	Temporary Emergency Housing
Total Countywide Allocation	**75,184**	**19,905**	**5,714**	**13,620**	**8,844**	**4,772**	**3,937**	**18,392**	**3,037**
Unincorporated UGA	22,946	6,375	1,830	4,362	2,699	1,456	1,202	5,022	973
Rural Outside UGA	3,534	0	0	0	416	225	185	2,708	0
Airway Heights	5,007	1,391	399	952	589	318	262	1,096	212
Cheney	2,535	704	202	482	298	161	133	555	107
Deer Park	1,023	284	82	194	120	65	54	224	43
Fairfield	0	0	0	0	0	0	0	0	0
Latah	0	0	0	0	0	0	0	0	0
Liberty Lake	6,601	1,834	526	1,255	776	419	346	1,445	280
Medical Lake	179	50	14	34	21	11	9	40	8
Millwood	36	10	3	7	4	2	2	8	2
Rockford	53	15	4	10	6	3	3	12	2
Spangle	0	0	0	0	0	0	0	0	0
Spokane (City)	17,550	4,875	1,400	3,336	2,066	1,115	918	3,840	744
Spokane Valley	15,713	4,365	1,253	2,987	1,848	997	823	3,440	666
Waverly	7	2	1	1	1	0	0	2	0

Note: Jurisdictions are NOT required to ensure that these units are built. They must simply have zoning, regulations and development codes that allow these units to be built.

Housing Allocation Numbers (Original)

	Method A Prime								
	Housing Allocation Income Bands								
	Total	0-30% AMI Non-PSH	0-30% AMI PSH	30-50%	50-80%	80-100%	100-120%	>120%	Temporary Emergency Housing
Total Countywide Allocation	75,184	19,905	5,714	13,620	8,844	4,772	3,937	18,464	3,037
Unincorporated UGA	22,946	6,375	1,830	4,362	2,699	1,456	1,202	5,022	973
Rural Outside UGA	3,534	0	0	0	416	225	185	2,780	0
Airway Heights	5,007	1,391	399	952	589	318	262	1,096	212
Cheney	2,535	704	202	482	298	161	133	555	107
Deer Park	1,023	284	82	194	120	65	54	224	43
Fairfield	0	0	0	0	0	0	0	0	0
Latah	0	0	0	0	0	0	0	0	0
Liberty Lake	6,601	1,834	526	1,255	776	419	346	1,445	280
Medical Lake	179	50	14	34	21	11	9	40	8
Millwood	36	10	3	7	4	2	2	8	2
Rockford	53	15	4	10	6	3	3	12	2
Spangle	0	0	0	0	0	0	0	0	0
Spokane (City)	17,550	4,875	1,400	3,336	2,066	1,115	918	3,840	744
Spokane Valley	15,713	4,365	1,253	2,987	1,848	997	823	3,440	666
Waverly	7	2	1	1	1	0	0	2	0

Note: These numbers, which were included in the original staff report, contain small errors that incorrectly represent the current HAPT allocation. These errors have been corrected in the table on the top of this page.

SPOKANE COUNTY STEERING COMMITTEE OF ELECTED OFFICIALS
1026 W Broadway • Spokane WA 99260-0170 • 509.477.1500 • bphelp@spokanecounty.org

December 17, 2024

Mary Kuney, Chair
Spokane County Board of County Commissioners
1026 W. Broadway Ave.
Spokane, WA 99260

RE: Steering Committee of Elected Officials Recommendation for the 2026-2046 Spokane County Housing for All Planning Tool (HAPT) methodology

Chair Kuney and Commissioners,

As required by the Spokane County Interlocal Agreement titled Growth Management Act (GMA Joint Planning) Section 3 D, I am forwarding the recommendation of the Steering Committee of Elected Officials (SCEO) regarding the adoption of the Spokane County Housing for All Planning Tool (HAPT) methodology for the planning period of 2026-2046 for use by the County and constituent communities in planning for future growth and housing allocations under the GMA.

The SCEO held a public hearing on the proposed amendment on September 25, 2024, and considered comments from the Planning Technical Advisory Committee (PTAC). There was no public comment or testimony in favor of or against the proposed amendment.

After deliberation, the Steering Committee unanimously recommended approval of the proposed Spokane County 2026-2046 HAPT methodology.

Sincerely,

Al French, Commissioner of Spokane County,
Chair, Spokane County Steering Committee of Elected Officials

9a

Submit to Clerk of the Board with available supporting materials (Resolutions, Agreements, Presentations, etc.)

AGENDA SHEET

SUBMITTING DEPARTMENT: Building & Planning

CONTACT PERSON: Scott Chesney, Laurie Carver

PHONE NUMBER: 477-7212, 509-477-7127

CHECK TYPE OF MEETING BELOW:

☒ Regular Legislative Session Agenda

BELOW FOR CLERK'S USE ONLY:

Clerk's Resolution No.	25-0033
Approved:	Majority/Unanimous
Denied:	Majority/Unanimous
Renews/Amends No.	
Public Works No.	
Purchasing Dept. No.	

***AGENDA TITLE** (please provide a reasonably descriptive agenda title for this item:* Consider the SCEO Recommendation for the Housing for all Planning Tool Methodology (HAPT)

***DESCRIPTIVE SUMMARY** (please provide anticipated fiscal and budgetary information & reason for request):* On September 25, 2024, the Steering Committee of Elected Officials voted to adopt HAPT method A-Prime based on the Planning Technical Advisory Committee recommendation. Method A-Prime allocates housing units based primarily on the share of growth each jurisdiction is projected to receive.

***FISCAL IMPACT** (please provide anticipated fiscal and budgetary impact, with amount and source of funds, if applicable):* NA

***REQUESTED BOARD ACTION** (if any):*

Other County Departments Impacted - List any other departments that were notified in advance of this agenda item: Legal

This Item will need to be codified in the Spokane County Code: No

Recommendation for HAPT: Housing Share

PLANNING TECHNICAL ADVISORY COMMITTEE

Report and Recommendation to the Steering Committee of Elected Officials

Periodic Update under the Growth Management Act, 2026 to 2046

Written and Recommended by PTAC, January 2025

Executive Summary

The Planning Technical Advisory Committee (PTAC) has identified a possible issue with previous runs of the Housing for All Planning Tool (HAPT), which all communities planning under the Growth Management Act have been advised to use when allocating housing by affordability for the region. The intended input for the tool—the data that is provided to the tool and then used to calculate each jurisdictions' housing allocation—is the share of housing growth each jurisdiction is expected to accommodate. Unfortunately, due to unclear instructions, the previous HAPT outputs shared with the Steering Committee of Elected Officials (SCEO) used the share of population growth instead.

Following a review of the data and the HAPT itself, **the PTAC recommends that the region use housing growth share as the input for the HAPT**, specifically a housing growth share created by applying the same assumptions built into the HAPT tool itself to convert the adopted population share to housing share.

Of note, this recommendation does not affect which method within HAPT is utilized. The existing SCEO recommendation for the method known as "A Prime" is not affected by PTACs recommendation in this memo.

The full output of the HAPT, assuming that housing share generated in the way recommended by PTAC is used, is attached to the end of this memo.

Introduction

Following the SCEO vote to recommend Method "A Prime" when using the HAPT, the members of PTAC identified that there had been some confusion as to which inputs should be provided to the HAPT when calculating housing share. As a result, PTAC's Housing Subcommittee met several times in the third and fourth quarters of 2024 to consider how this might affect the housing allocation output from HAPT. In essence, it appears to PTAC that the HAPT was intended to be provided with the share of housing growth each jurisdiction is expected to accommodate, while previous use of the HAPT utilized the share of population growth instead.

After discussing this at length, PTAC has developed a method for converting the currently adopted Population Share[1] to housing growth share, which can then be input into HAPT. This memo outlines the recommendation by PTAC for doing this, and provides the summary growth numbers for each jurisdiction that results.

HAPT Method A Prime

At their meeting on September 25, 2024, the SCEO voted to recommend the use of the "A Prime" method in the HAPT. Throughout this discussion and recommendation by PTAC, no change to this method is anticipated or recommended. PTAC feels that SCEO's original recommendation, adopted on September 24, 2024, does not require revision to accommodate PTAC's recommendations herein.

[1] Adopted by BOCC Resolution 24-0348 on June 18, 2024.

Housing Share versus Population Share

When PTAC and SCEO previously saw the "A Prime" results, it was always using the share of population growth assigned to each jurisdiction per the adopted allocation[2]. However, after multiple conversations within PTAC and with Commerce staff, it was apparent that the instructions in HAPT were unclear and that the tool was instead asking for the share of housing growth.

The share of population growth and the share of housing growth *are* directly related to each other, but due to certain factors they are rarely the same number for a given jurisdiction. For instance, household size (people per household) in each jurisdiction is not the same nor does it stay static over time. Household size is continually changing from year to year. Furthermore, some jurisdictions contain a larger amount of group quarters housing (i.e. college dorms, prisons, treatment centers) and that rate changes over time. Those living in group quarters do not require additional housing units, thus they must be subtracted from the overall population growth share for each jurisdiction.

Because of these factors, it is important to develop a share of housing each jurisdiction for the entirety of the planning horizon (through 2046), not just today. Jurisdictions differ from each other and some attempt to differentiate their allocations accordingly should be made as well.

A Note on the Underproduction of Housing

An additional factor has been raised by public commenters and PTAC members that is worth discussing here. That factor is the known historic underproduction of housing statewide. Commerce's research has made it clear that development in jurisdictions across the state have been lower than what is required to house existing populations. As a result, many jurisdictions' current housing stock is already too small to accommodate the need of the existing population, not to mention the growth that is coming.

It is important to note that HAPT factors this underproduction into its results. Accordingly, the number of housing units a jurisdiction may be allocated when using HAPT will appear high when compared to population growth. This is specifically because HAPT attempts to also allocate sufficient housing to accommodate the recent underproduction of housing *as well as* future growth. This condition is true regardless of which input is used for HAPT.

Determining Housing Share

The Department of Commerce has not provided jurisdictions with a method for calculating housing growth share. Likewise, GMA does not mandate that Cities and Counties use a particular method to develop housing share. However, the PTAC subcommittee found that the HAPT itself provides one possible method.

While PTAC spent considerable time exploring other ways to convert population growth to housing growth, ultimately PTAC felt that because the resulting housing share would be input into HAPT, it was most defensible to use the assumptions already built into HAPT to calculate housing share. That way, the same set of assumptions would be applied to all parts of the tool and any unintentional bias or modification of results would be minimized.

[2] Adopted by BOCC Resolution 24-0348 on June 18, 2024.

Essentially, the housing share for each jurisdiction would be calculated directly from the population share already adopted by the BOCC. While it is more sophisticated than can be expressed simply here, the method for calculating housing share from population share is generally[3] as follows:

[(Population Share – Group Quarters Population) / Household Size] + 6% to Account for Vacant Homes

For the purposes of the HAPT, the tool assumes that household size is shrinking over time and that each jurisdiction will see the same share of group housing in the County as they are in 2020. The resulting housing share for each jurisdiction and area is as shown in the following table. Again, when considering the resulting housing share, the following should be kept in mind:

- Population share and housing share are not the same thing, though they are related to one another.
- Housing share in the tool is somewhat elevated to account for historic underproduction of housing.

Table 1: Population and Housing Share Compared

Jurisdiction	Share: Population Growth	Share: Housing Growth
Spokane County (Whole)	100.00%	100.00%
All Unincorporated Areas	35.21%	31.14%
Unincorporated Rural	4.70%	8.24%
Unincorporated UGA	30.51%	22.81%
Incorporated County	64.79%	68.95%

Jurisdiction	Share: Population Growth	Share: Housing Growth
Airway Heights	6.66%	5.26%
Cheney	3.37%	2.76%
Deer Park	1.36%	1.44%
Fairfield	0.00%	0.00%
Latah	0.00%	0.00%
Liberty Lake	8.78%	6.89%
Medical Lake	0.24%	0.44%
Millwood	0.05%	0.14%
Rockford	0.07%	0.09%
Spangle	0.00%	0.02%
Spokane	23.34%	29.74%
Spokane Valley	20.90%	22.16%
Waverly	0.01%	0.02%

As shown in the table, when comparing population share to housing share, some jurisdictions are expected to accommodate a lower share of housing growth than population growth (e.g. Liberty Lake) while others are shown to expect a higher share of housing than population (e.g. the City of Spokane). Why this happens is complex and due to the fact that HAPT uses multiple factors from multiple sources to determine these amounts.

Because the HAPT only has one input for each jurisdiction—share of housing growth—those jurisdictions where the housing share is larger than population share can expect their housing number output from HAPT to increase when compared to the sample outputs discussed by SCEO previously. Conversely,

[3] The assumptions in HAPT are more sophisticated than this, accounting for changes over time and each jurisdiction's share of certain values. Replication of the numbers herein by using this simplified equation should not be considered when evaluating this recommendation.

jurisdictions with smaller housing share than population share can expect their HAPT output to decrease over earlier results.

Comparing HAPT Results from Prior Versions and Now

As a handy comparison of how overall housing allocations would change when housing share is input into HAPT rather than population share, the table at right lists the total housing allocation using both inputs. Also shown is whether the total housing units would increase or decrease for each jurisdiction when using housing share, as the tool intended.

While housing share is the intended input for HAPT, using housing share would increase the housing allocation to the rural areas (outside the UGA). To a greater degree, the larger jurisdictions would also be subject to a larger allocation.

It's important to note that while this represents a large change for some jurisdictions, increased allocations to those communities in the center of the UGA (City of Spokane, Spokane Valley) is consistent with the requirements of GMA, wherein growth should be concentrated in the UGA and limited on the edges.

Table 2: Comparison of HAPT Total Housing by Jurisdiction

Jurisdiction	Total New Units Using Pop Share	Total New Units Using Housing Share	Change if Using Housing Share
Unincorporated Rural	3,534	6,195	Higher
Unincorporated UGA	22,946	17,142	Lower
Airway Heights	5,007	3,955	Lower
Cheney	2,535	2,076	Lower
Deer Park	1,023	1,083	Higher
Fairfield	0	0	Higher
Latah	0	0	Higher
Liberty Lake	6,601	5,180	Lower
Medical Lake	179	329	Higher
Millwood	36	106	Higher
Rockford	53	68	Higher
Spangle	0	15	Higher
Spokane	17,550	22,359	Higher
Spokane Valley	15,713	16,661	Higher
Waverly	7	15	Higher

While the allocation for unincorporated rural areas would be more than 3/4 larger, that increase would be spread throughout a very large area (all parts of the County outside the UGA), tempering the effects of that growth somewhat. Furthermore, urban scale services to those additional homes would not be required due to their location.

PTAC Recommendations: Housing Share and HAPT

Following multiple discussions on the differences between population share and housing share, PTAC generally feels that housing share, created using the same assumptions already built into the HAPT, is the most defensible and effective input for the HAPT. The following benefits of using housing share discussed were as follows:

- The assumptions used to generate housing share from population share are identical to those in the HAPT now.
- The HAPT model is sophisticated—an adjustment in one variable can have unintended consequences.
- The data used to generate housing share have already been considered and adopted by the BOCC.

Final Results

If the share of housing growth indicated in Table 1 in input into the HAPT, and the method previously described as Method A Prime in the SCEO recommendation is utilized, then the final housing allocation shown in the attached spreadsheet is provided.

Spokane County

	Total	0-30% Non-PSH	0-30% PSH	>30-50%	>50-80%	>80-100%	>100-120%	>120%	Emergency Housing Needs (Temporary)
	Permanent Housing Needs by Income Level (% of Area Median Income)								
Countywide Estimated Housing Supply (2020)	221,840	6,613	937	34,798	91,803	32,035	20,981	34,673	1,192
Countywide Total Housing Needs (2046)	297,024	26,518	6,651	48,418	100,647	36,807	24,918	53,065	4,229
Countywide Additional Units Needed (2020-2046)	**75,184**	**19,905**	**5,714**	**13,620**	**8,844**	**4,772**	**3,937**	**18,392**	3,037

68.09% ← *Minimum allocation to urban areas (cumulatively) to accommodate needs at all affordability levels. This varies by county and population target.*

91.77% ← *Urban area combined % allocation from user inputs*

HOUSING ALLOCATION FROM SELECTED SHARES

		User Input - % Share of Countywide Housing Growth. Values must sum to 100%	Total Units Allocated (2020-2046)	0-30% Non-PSH	0-30% PSH	>30-50%	>50-80%	>80-100%	>100-120%	>120%	Emergency Housing Needs (Temporary) *
		User Input		Permanent Housing Needs by Income Level (% of Area Median Income)							
Unincorporated County	Existing Combined (Estimate)	-	59,013	1,179	0	5,981	14,559	9,421	9,603	18,270	30
	Future Inside UGA	22.81	**17,149**	4,948	1,420	3,385	2,017	1,088	898	3,393	755
	Future Outside UGA	8.23	**6,188**	0	0	0	728	393	324	4,743	0
Airway Heights	Existing (Estimate)	5.26	3,626	67	0	685	1,997	545	134	198	0
	Future Allocation		**3,955**	1,141	328	781	465	251	207	782	174
Cheney	Existing (Estimate)	2.76	5,354	256	0	935	3,097	690	153	223	0
	Future Allocation		**2,076**	599	172	410	244	132	109	410	91
Deer Park	Existing (Estimate)	1.44	1,902	45	0	434	804	275	99	245	0
	Future Allocation		**1,083**	312	90	214	127	69	57	214	48
Fairfield	Existing (Estimate)	0.00	228	5	0	79	104	23	5	12	0
	Future Allocation		**0**	0	0	0	0	0	0	0	0
Latah	Existing (Estimate)	0.00	88	0	0	35	41	6	2	4	0
	Future Allocation		**0**	0	0	0	0	0	0	0	0
Liberty Lake	Existing (Estimate)	6.89	4,915	39	0	208	1,133	1,238	930	1,367	0
	Future Allocation		**5,180**	1,494	429	1,023	609	329	271	1,025	228
Medical Lake	Existing (Estimate)	0.44	1,828	184	0	159	839	329	96	221	0
	Future Allocation		**329**	95	27	65	39	21	17	65	15
Millwood	Existing (Estimate)	0.14	820	27	0	147	413	142	37	54	0
	Future Allocation		**106**	30	9	21	12	7	6	21	5
Rockford	Existing (Estimate)	0.09	195	0	0	62	85	25	7	16	0
	Future Allocation		**68**	20	6	13	8	4	4	13	3
Spangle	Existing (Estimate)	0.02	127	6	0	42	56	12	3	8	0
	Future Allocation		**15**	4	1	3	2	1	1	3	1
Spokane	Existing (Estimate)	29.74	99,938	3,534	937	19,479	47,090	11,873	7,118	9,907	1,134
	Future Allocation		**22,359**	6,452	1,851	4,413	2,631	1,418	1,170	4,424	983
Spokane Valley	Existing (Estimate)	22.16	43,751	1,265	0	6,515	21,579	7,456	2,792	4,144	0
	Future Allocation		**16,661**	4,806	1,380	3,289	1,960	1,058	872	3,296	733
Waverly	Existing (Estimate)	0.02	55	6	0	37	6	0	2	4	0
	Future Allocation		**15**	4	1	3	2	1	1	3	1

Appendix B:
Assembled Affordability by SubArea from Public Market Data Sources

Appendix to <u>Accommodating Affordable Housing in the City of Spokane</u>, 2025

Affordability Data by Subarea - Purchase Costs

Home Prices

Source: Zillow

from fanniemae mortgage calculator

Subarea	Median Value	Mortgage Payment	Income Required	Bracket
Balboa-South Indian Trail	$424,754	$3,635	$145,400	120+%AMI
Bemiss	$280,200	$2,398	$95,920	80-100%AMI
Browne's Addition	$354,056	$3,031	$121,240	120+%AMI
Chief Garry Park	$268,467	$2,298	$91,920	80-100%AMI
Cliff-Cannon	$405,652	$3,473	$138,920	120+%AMI
Comstock	$448,209	$3,836	$153,440	120+%AMI
East Central	$307,951	$2,636	$105,440	80-100%AMI
Emerson-Garfield	$292,084	$2,500	$100,000	80-100%AMI
Five Mile-Prairie	$565,299	$4,839	$193,560	120+%AMI
Hillyard	$280,517	$2,401	$96,040	80-100%AMI
Latah Valley	$566,119	$4,846	$193,840	120+%AMI
Lincoln Heights	$391,469	$3,351	$134,040	120+%AMI
Logan	$303,672	$2,599	$103,960	80-100%AMI
Manito-Cannon Hill	$535,315	$4,582	$183,280	120+%AMI
Minnehaha	$314,370	$2,690	$107,600	80-100%AMI
Moran Prairie	$494,428	$4,232	$169,280	120+%AMI
Nevada-Lidgerwood	$299,131	$2,560	$102,400	80-100%AMI
North Hill	$310,829	$2,661	$106,440	80-100%AMI
North Indian Trail	$496,470	$4,249	$169,960	120+%AMI
Northwest	$346,592	$2,966	$118,640	120+%AMI
Peaceful Valley	$329,062	$2,817	$112,680	120+%AMI
Riverside	$400,099	$3,424	$136,960	120+%AMI
Rockwood	$619,562	$5,303	$212,120	120+%AMI
Thorpe-Westwood	$442,224	$3,785	$151,400	120+%AMI
West Central	$299,526	$2,563	$102,520	80-100%AMI
West Hills	$405,951	$3,475	$139,000	120+%AMI
Whitman	$280,856	$2,404	$96,160	80-100%AMI

Home Prices

Source: Redfin

from fanniemae mortgage calculator

Subarea	Median Value	Mortgage Payment	Income Required	Bracket
Balboa-South Indian Trail	$382,450	$3,274	$130,960	120+%AMI
Bemiss	$295,750	$2,532	$101,280	80-100%AMI
Browne's Addition	$310,000	$2,654	$106,160	80-100%AMI
Chief Garry Park	$296,956	$2,542	$101,680	80-100%AMI
Cliff-Cannon	$430,000	$3,681	$147,240	120+%AMI
Comstock	$435,475	$3,728	$149,120	120+%AMI
East Central	$300,000	$2,568	$102,720	80-100%AMI
Emerson-Garfield	$302,500	$2,589	$103,560	80-100%AMI
Five Mile-Prairie	$565,530	$4,841	$193,640	120+%AMI
Grandview Thorpe	$463,000	$3,962	$158,480	120+%AMI
Hillyard	$285,000	$2,439	$97,560	80-100%AMI
Latah Valley	$574,950	$4,921	$196,840	120+%AMI
Lincoln Heights	$403,000	$3,449	$137,960	120+%AMI
Logan	$318,000	$2,722	$108,880	120+%AMI
Manito-Cannon Hill	$540,000	$4,622	$184,880	120+%AMI
Minnehaha	$330,000	$2,825	$113,000	120+%AMI
Moran Prairie	$634,656	$5,432	$217,280	120+%AMI
Nevada-Lidgerwood	$302,000	$2,585	$103,400	80-100%AMI
North Hill	$305,000	$2,611	$104,440	80-100%AMI
North Side	$335,000	$2,868	$114,720	120+%AMI
Northwest Spokane	$340,000	$2,910	$116,400	120+%AMI
Peaceful Valley	$310,000	$2,654	$106,160	80-100%AMI
Riverside	$460,000	$3,937	$157,480	120+%AMI
Rockwood	$635,000	$5,435	$217,400	120+%AMI
West Central	$280,500	$2,400	$96,000	80-100%AMI
West Hills	$415,000	$3,552	$142,080	120+%AMI
Whitman	$291,000	$2,491	$99,640	80-100%AMI

NOTE: The subareas above do not necessarily correspond to Spokane Neighborhood Council boundaries.

Affordability Data by Subarea - Rental Costs

Rental Costs

Source: RentCafe

Subarea	Average Rent (May 2025)	Income Required	Bracket
Balboa - South Indian Trail	$1,330	$53,200	0-80%AMI
Bemiss	$1,442	$57,680	0-80%AMI
Browne's Addition	$1,546	$61,840	0-80%AMI
Chief Garry Park	$1,426	$57,040	0-80%AMI
Cliff - Cannon	$1,441	$57,640	0-80%AMI
Comstock	$1,373	$54,920	0-80%AMI
East Central Spokane	$1,345	$53,800	0-80%AMI
Emerson - Garfield	$1,521	$60,840	0-80%AMI
Five Mile Prairie	$1,328	$53,120	0-80%AMI
Grandview - Thorpe	$1,540	$61,600	0-80%AMI
Hillyard	$1,366	$54,640	0-80%AMI
Latah Valley	$1,467	$58,680	0-80%AMI
Lincoln Heights	$1,149	$45,960	0-80%AMI
Logan	$2,009	$80,360	80-120%AMI
Manito - Cannon Hill	$1,139	$45,560	0-80%AMI
Minnehaha	$1,366	$54,640	0-80%AMI
Moran Prairie	$1,329	$53,160	0-80%AMI
Nevada - Lidgerwood	$1,237	$49,480	0-80%AMI
North Hill	$1,072	$42,880	0-80%AMI
North Indian Trail	$1,759	$70,360	80-120%AMI
Northwest Spokane	$1,382	$55,280	0-80%AMI
Peaceful Valley	$1,546	$61,840	0-80%AMI
Riverside	$1,466	$58,640	0-80%AMI
Rockwood	$1,139	$45,560	0-80%AMI
Southgate	$1,529	$61,160	0-80%AMI
West Central Spokane	$1,546	$61,840	0-80%AMI
West Hills	$1,425	$57,000	0-80%AMI
West Meadows	$1,277	$51,080	0-80%AMI
Whitman	$1,335	$53,400	0-80%AMI

Rental Costs

Source: Apartments.com

Subarea	Average Rent (May 2025)	Income Required	Bracket
Bemiss	$1,202	$48,080	0-80%AMI
Chief Garry Park	$1,555	$62,200	0-80%AMI
City Center	$1,460	$58,400	0-80%AMI
Cliff Cannon	$1,359	$54,360	0-80%AMI
Comstock	$1,330	$53,200	0-80%AMI
Dartford	$1,394	$55,760	0-80%AMI
Downtown	$1,410	$56,400	0-80%AMI
Emerson Garfield	$1,374	$54,960	0-80%AMI
Lincoln Heights	$1,127	$45,080	0-80%AMI
Logan	$1,360	$54,400	0-80%AMI
Moran Prairie	$1,380	$55,200	0-80%AMI
Nevada Lidgerwood	$1,202	$48,080	0-80%AMI
North Spokane	$1,311	$52,440	0-80%AMI
Palisades Park	$1,282	$51,280	0-80%AMI
Rockwood	$1,157	$46,280	0-80%AMI
South Spokane	$1,265	$50,600	0-80%AMI
Town and Country	$1,369	$54,760	0-80%AMI
U-District	$1,659	$66,360	80-120%AMI
West Central	$1,326	$53,040	0-80%AMI
West Spokane	$1,274	$50,960	0-80%AMI

NOTE: The subareas above do not necessarily correspond to Spokane Neighborhood Council boundaries.

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Appendix C:
Emergency Housing & Permanent Affordable Housing Supplement

Appendix to Accommodating Affordable Housing in the City of Spokane, 2025

This supplement is currently being developed alongside the Final Envrionmental Impact Statement and during finalization of the next updated draft of PlanSpokane 2046.

It will be added here when the appendix is completed, prior to Plan Commission's hearings on PlanSpokane 2046.

City of Spokane

Racially Disparate Impacts Analysis

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

A requirement of the Growth Management Act (RCW 36.70A.70)

October 2025

CITY OF SPOKANE

PLANSPOKANE

Resilient | Connected | Livable | 2046

Prepared by City of Spokane
Planning & Economic Development
808 West Spokane Falls Blvd.
Spokane, WA 99203
planspokane.org

Land Acknowledgement

We acknowledge that we are on the unceded land of the Spokane people. And that these lands were once the major trading center for the Spokanes as they shared this place and welcomed other area tribes through their relations, history, trade, and ceremony. We also want to acknowledge that the land holds the spirit of the place, through its knowledge, culture, and all the original peoples Since Time Immemorial.

As we take a moment to consider the impacts of colonization may we also acknowledge the strengths and resiliency of the Spokanes and their relatives. As we work together making decisions that benefit all, may we do so as one heart, one mind, and one spirit.

We are grateful to be on the shared lands of the Spokane people and ask for the support of their ancestors and all relations. We ask that you recognize these injustices that forever changed the lives of the Spokane people and all their relatives.

We agree to work together to stop all acts of continued injustices towards Native Americans and all our relatives. It is time for reconciliation. We must act upon the truths and take actions that will create restorative justice for all people.

Adopted by Spokane City Council on the 22nd day of March, 2021 via Resolution 2021-0019

Table of Contents

Table of Figures

1. Introduction

Housing and homeownership are foundational parts of belonging in a community. However, access to housing and housing challenges have not been felt equally and has impacted racial and ethnic groups in different ways. Understanding housing disparities is an important part of understanding who is being left out, what the systems are that are creating unequal access, and how the City of Spokane can undo the impacts.

In 2021, the Washington State Legislature changed the way communities are required to plan for housing. House Bill 1220 (HB 1220) amended the Growth Management Act (GMA) to require local governments to "plan for and accommodate" housing affordable to all income levels. This significantly strengthens the previous goal, which was to "encourage" affordable housing. In addition, new changes require local jurisdictions to examine racially disparate impacts, displacement, exclusion, and displacement risk in housing policies and regulations and adopt policies to begin to undo the impacts and address patterns of disinvestment (RCW 36.70A.070(2)).

The purpose of this report and evaluation is to move forward the work of analyzing the impacts of Spokane's housing policies and regulations related to racially disparate impacts, displacement, exclusion, and displacement risk. This will inform changes to policies in the Comprehensive Plan relating to housing and land use as part of the City's Plan Spokane 2046 Periodic Update.

Specifically, the new requirements in RCW 36.70A.070(2) state that jurisdictions must now adopt a housing element that:[1]

- (e) Identifies local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing, including:
  - (i) Zoning that may have a discriminatory effect;
  - (ii) Disinvestment; and
  - (iii) Infrastructure availability;
- (f) Identifies and implements policies and regulations to address and begin to undo racially disparate impacts, displacement, and exclusion in housing caused by local policies, plans, and actions;
- (g) Identifies areas that may be at higher risk of displacement from market forces that occur with changes to zoning development regulations and capital investments; and
- (h) Establishes anti-displacement policies, with consideration given to the preservation of historical and cultural communities as well as investments in low, very low, extremely low, and moderate-income housing; equitable development initiatives; inclusionary zoning; community planning requirements; tenant protections; land disposition policies; and consideration of land that may be used for affordable housing.

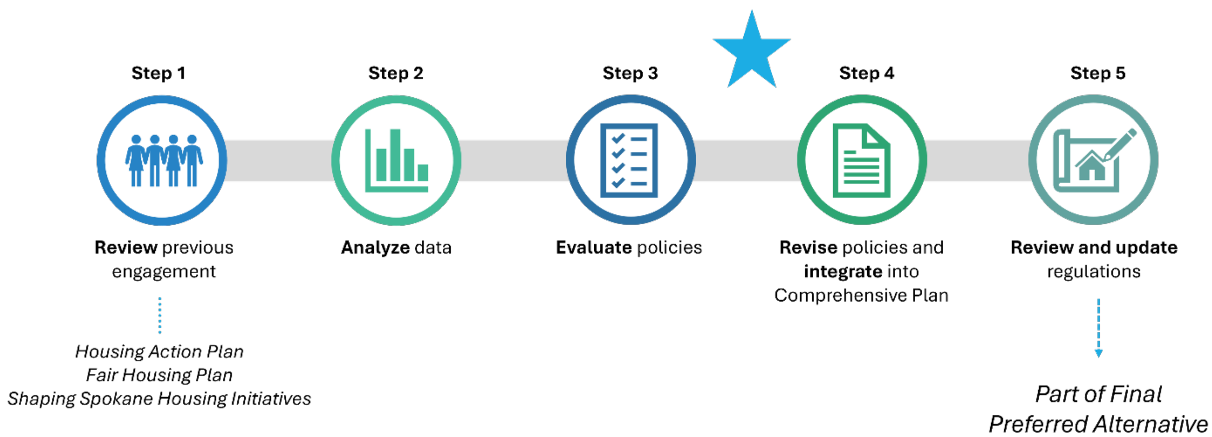
The Washington State Department of Commerce developed a guidebook in 2023, "Guidance to Address Racially Disparate Impacts," for how to update the Housing Element to address the new

[1] RCW 36.70A.070(2). https://app.leg.wa.gov/RCW/default.aspx?cite=36.70A.070

requirements.[2] This analysis follows the guidance as the framing for the report and as a template for evaluation.

The process is outlined below in Figure 1. The first step is to review previous engagement and understand the community by identifying measures to evaluate racially disparate impacts, exclusion and displacement and populations at risk. The next step is data analysis to examine data for racially disparate impacts, exclusion and displacement and identify areas of higher displacement risk. Then policy evaluation helps to identify which policies contribute to disparate impacts, displacement or exclusion, and what new or improved policies are needed to undo impacts and prevent displacement. The recommendations of the policy evaluation are then integrated into the comprehensive plan policies. The final step is to review and revise regulations as part of the comprehensive plan periodic update.

Figure 1. Process for analyzing racially disparate impacts



The Draft RDI Report was released in September 2025 on the PlanSpokane 2046 project page. City staff shared information via the PlanSpokane and Community Update newsletters, and presented to various committees, commissions, and boards for discussion:

- City Council Urban Experience Committee - September 8
- City Council Equity Subcommittee - September 17
- City Council Housing Action Subcommittee - September 18
- Plan Commission - September 24
- Community, Housing, and Human Services Board - October 1 (information only)
- Spokane Human Rights Commission - October 2

The RDI Report addresses the Steps 1-3 through policy evaluation. The Final Report will be an appendix to the PlanSpokane 2046 Comprehensive Plan, providing important context and foundational information. Ultimately, policy changes to the Housing Element will be presented in the adopted Comprehensive Plan. Additional public engagement will be part of the PlanSpokane 2046

[2] Washington State Department of Commerce (Commerce). (2023a). *Guidance to Address Racially Disparate Impacts: Updating your housing element to address new requirements.* https://deptofcommerce.app.box.com/s/1l217l98jattb87qobtw63pkplzhxege

process with workshops in November 2025 and reflected with analysis in the draft environmental impact statement. **Steps 4-5 will be policy revision, integration in the comprehensive plan, and review and update of the development regulations.**

1.1 Principal Definitions and Acronyms

Key terms from the statute are defined here, while the full list of definitions is included in the Commerce guidance.[3]

- **BIPOC:** Refers to "Black, Indigenous, and People of Color," often shortened to BIPOC, and widely used to be inclusive of diverse races and ethnicities. For the purposes of this report, BIPOC includes Black or African American, Indigenous (referred to as American Indian and Alaska Native or AI/AN), Asian, Native Hawaiian and Other Pacific Islander (referred to as NHOPI), some other race groups, two or more races groups, and people of Hispanic/Latino ethnicity.[4]
- **Disinvestment:** The effect, regardless of intent, of differentiated outcomes for a group based on a protected classification. May be an action or failure to act.
- **Displacement**: The process by which a household is forced to move from its community because of conditions beyond their control.
  - Physical displacement: Households are directly forced to move for reasons such as eviction, foreclosure, natural disaster, or deterioration in housing quality.
  - Economic displacement: Households are compelled to move by rising rents or costs of home ownership like property taxes.
  - Cultural displacement: Residents are compelled to move because the people and institutions that make up their cultural community have left the area.
- **Displacement Risk:** The likelihood that a household, business, or organization will be displaced from its community.
- **Exclusion in Housing:** The act or effect of shutting or keeping certain populations out of housing within a specified area, in a manner that may be intentional or unintentional, but which leads to non-inclusive impacts.
- **Exclusionary Zoning:** Zoning that limits the production of housing in a greater variety of housing forms that is affordable to low and moderate-income households, in a manner that may be intentional or unintentional, but which leads to non-inclusive impacts. This includes zoning laws such as exclusively single-family zones, minimum lot sizes, and separating multi-family development from single-family development.
- **Neighborhood Access:** Neighborhood access is the ability of a household to access housing in a specific neighborhood. Neighborhood access can be assessed by comparing household incomes to housing costs.

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[3] Commerce, 2023a

[4] WA State Department of Commerce. (2022). *Homeownership rates for Black, Indigenous, and People of Color in Washington: Recommendations from the Homeownership Disparities Work Group.* https://app.leg.wa.gov/ReportsToTheLegislature/Home/GetPDF?fileName=Homeownership%20Disparities%20Recommendations%20Report%20-%20FINAL%20-%20Sep2022_e0b6a028-62cf-478c-aa9b-52e5e5c66609.pdf

- **Racially Disparate Impacts:** When policies, practices, rules or other systems result in a disproportionate, or unequal, impact on one or more racial groups.
- **Racially Restrictive Covenants:** Racially restrictive covenants were clauses within property deeds that prevent specific people from buying or occupying land, often people of color such as Asian, Jewish and Black buyers. These covenants, at the time of their use, were legally enforceable contracts, prohibiting property owners, developers and realtors from selling or renting property to specified racial or ethnic groups.[5]
- **Redlining:** In the late 1930s, the federal Home Owner's Loan Corporation (HOLC) evaluated mortgage risks in cities across the country, rating neighborhoods as "best," "still desirable," "definitely declining," or "hazardous" (Honig, 2021). Neighborhoods that were evaluated as being financially risky were marked in red—which gave way to the term "redlining"—and lenders were discouraged from financing property in those areas. Because neighborhood boundaries were often drawn along racial lines, this practice disproportionately prevented people of color from accessing credit and buying homes.

1.2 Measures Used in Evaluation

The WA Commerce Guidance to Address Racially Disparate Impacts (2023a) outlines several indicators to conduct data analysis for an assessment of racially disparate impacts, exclusion, displacement and displacement risk in housing.[6] Additional analysis is included to provide deeper assessment of data and insights specific to Spokane.

The measures are defined as the following:

- **Direct Measures:** When policies, practices, rules or other systems result in a disproportionate impact on one or more racial groups.
- **Indirect Measures:** Measures of well-being that are related to where a person lives, including health, educational access, recreational access, and environmental risk exposure. Examining downstream effects of housing location and choice can help identify policies that may cause a racially disparate impact.
- **Measures of Exclusion:** The act or effect of shutting or keeping certain populations out of housing within a specified area, in a manner that may be intentional or unintentional, but which leads to non-inclusive impacts. Exclusion is assessed by examining patterns of segregation; that is, identifying areas of the city in which the population does not reflect the composition of the overall population.
- **Displacement:** The process by which a household is forced to move from its community because of conditions beyond their control.
- **Displacement Risk:** The potential for households to be forced or pressured to move from their homes due to factors like high housing costs, development pressure, and economic hardships.

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[5] Seattle Civil Rights and Labor History Project. (2020). *Racial Restrictive Covenants.* Retrieved from University of Washington. https://depts.washington.edu/civilr/covenants.htm
[6] Commerce, 2023a

1.3 Data List

Data Indicator	Primary Source	Type of Measure
HOLC Redlining Map	University of Richmond	Exclusion
Racially Restrictive Covenants	Eastern Washington University	Exclusion
Historic Trends in Homeownership	University of Washington	Direct
Homeownership	U.S. Census Bureau	Direct
Housing Cost-Burden	U.S. Census Bureau	Direct
Overcrowding	U.S. Census Bureau	Direct
Household Income	U.S. Census Bureau	Direct
Neighborhood Access	U.S. Census Bureau	Direct
Educational Access	Washington Office of Superintendent of Public Instruction	Indirect
Environmental Health Disparities	Washington State Department of Health EPA EJ Screen	Indirect
Climate Vulnerability	Spokane Climate Vulnerability Index	Indirect
Diversity Index	PolicyMap	Exclusion
Housing Choice Voucher	Spokane Housing Authority City of Spokane	Exclusion
Concentrations of Population Groups	City of Spokane Policy Map	Exclusion
Employment	U.S. Census Bureau	Exclusion
Evictions	Eastern Washington University	Existing Displacement
Foreclosures	City of Spokane	Existing Displacement
Demolitions	City of Spokane	Existing Displacement
Right of Way Acquisition	Washington State Department of Transportation	Existing Displacement
Rental Affordability	U.S. Census Bureau	Displacement Risk
Homeowner Affordability	U.S. Census Bureau	Displacement Risk
Unpaid Property Taxes	Spokane County Accessor	Displacement Risk
Access to Services	City of Spokane Spokane Transit Authority	Displacement Risk
Housing Age	U.S. Census Bureau Spokane County Assessor's Office	Displacement Risk
Development Pressure	City of Spokane	Displacement Risk
Social Vulnerability Index	Centers for Disease Control	Displacement Risk
Market Assessment	Washington State Department of Commerce	Displacement Risk

1.4 Key Findings

There is a persistent gap in homeownership rates for Black, Indigenous, and People of Color (BIPOC) households compared to White households, with the highest disparity among Black or African American households, Native Hawaiian and Other Pacific Islander households, and American Indian and Alaska Native households. In 2023, 61% of White, Non-Hispanic households owned their home in Spokane. In comparison, only 42% of people of color households were homeowners, making a gap of 19 percentage points, known as the racial homeownership gap.

Exclusionary zoning enacted by the City of Spokane reinforced the impacts of redlining and racially restrictive covenants, wherein redlined areas historically had a lower percentage of single unit zoning in residential areas. This had a segregating effect on BIPOC households and lower income households and played a significant role in influencing outcomes like homeownership opportunities and property values by disproportionately preventing people of color from accessing credit and buying homes.

Neighborhood access, income disparities, and housing affordability vary by race, putting homeownership farther out of reach for BIPOC households, who have limited access to neighborhoods and higher performing schools. The ability of Black or African American, American Indian and Alaska Native, and Native Hawaiian and Other Pacific Islander households to access housing is considerably more limited, with access generally limited to Central and Northeast Spokane.

Environmental health disparities reflect systemic disparities of historic disinvestment, exasperating disparate outcomes for overburdened communities, including higher levels of exposure to environmental hazards and lower life expectancy. Almost one-third of Spokane's population live in an area that is considered extremely environmentally overburdened, with highest exposure to environmental harms along the I-90 corridor, particularly East Central, and Northeast Spokane, as well as the lower South Hill.

Patterns of segregation are reflected in the concentration of BIPOC households and uneven distribution of racial groups among neighborhoods within Spokane. However, data suggests that exclusion of people of color from Spokane for employment or housing is limited, based on residential and worker composition compared to Spokane County as a whole. This is likely due to Spokane being the leader in the region for affordable housing provision and a diversity of housing types that provide a range of options for residents and their needs.

Access to employment areas varies, with areas closer to downtown having better access to jobs, suggesting there is not an exclusion to jobs proximity. However, the proximity to I-90 in the central and downtown areas, which historically and currently have higher populations of communities of color, is still reflective of the legacy of divisive highway infrastructure. All workers of color had higher rates of taking public transit to work than White, Not Hispanic workers.

While Spokane has grown consistently over the last decade, growth has not been spread equally across the city, with both areas of increasing integration and areas experiencing displacement. Spokane has experienced diversifying population growth in areas with historically lower BIPOC populations. In contrast, areas with historically larger BIPOC populations saw a decrease in BIPOC population, which can suggest displacement or gentrification within these historic cultural communities.

In Spokane, households at both ends of the income spectrum have fewer rental units available for their income level. For households at moderate-income levels or greater, this indicates a lack of availability of market-rate units. For households at the extremely low-income level, this points to a constraint in affordability and availability, potentially exacerbated by competition for housing from higher income levels.

Housing patterns and policies concentrate multi-family subsidized housing primarily into Central Spokane and Northeast Spokane, which limits access and choice for low-income households, excluding them from large parts of the city.

Higher displacement risk exists in Central and Northeast Spokane, areas that have higher proportions of BIPOC and lower income households. This overlaps with areas that also have higher eviction and demolition rates, as well changing market factors that is increasing redevelopment.

The City of Spokane has made recent progress through land use and code changes that begin to undo the impacts of racially disparate impacts from historic policies and practices that continue to impact residents' ability to access housing and opportunities today. The policy evaluation outlines additional work to implement changes for a continued and strengthened focus on housing equity and accessibility over the next 20 years.

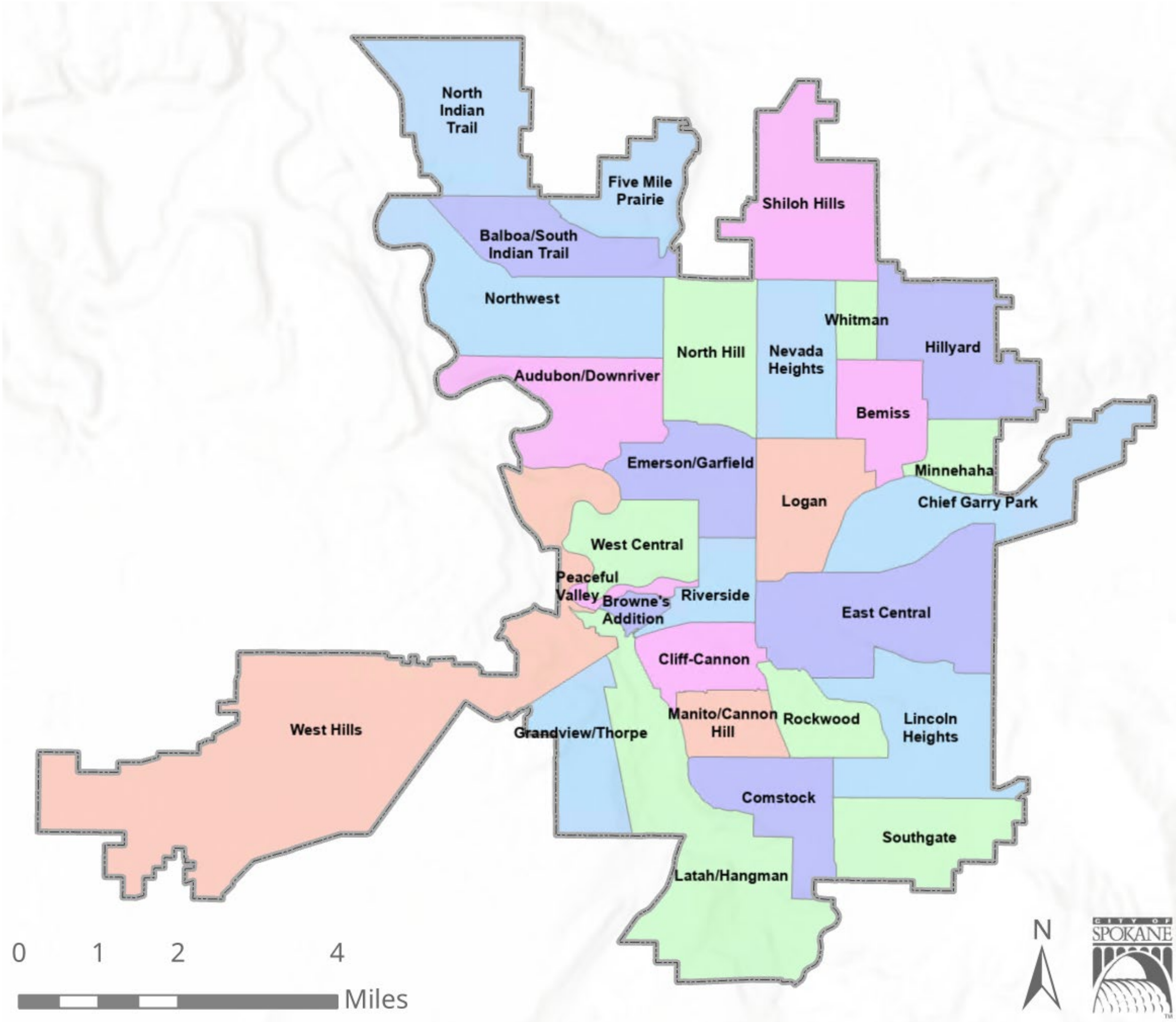
1.5 Neighborhoods

The City of Spokane has 29 neighborhoods, each providing a mix of housing and services. These boundaries, in addition to Census Tracts, are used throughout the analysis to tie data to specific locations and highlight where racially disparate impacts are occurring within the city when present. For more information on neighborhoods, visit the Office of Neighborhood Services on the City of Spokane website.[7] **See Figure 2.**

While neighborhoods are important geographies, this analysis primarily utilizes Census Tracts to align with Census data. Census Tracts are usually smaller than the neighborhood scale and do not always align with neighborhoods or the city limits.

[7] City of Spokane, Office of Neighborhood Services (ONS). https://my.spokanecity.org/neighborhoods/

Figure 2. City of Spokane Neighborhoods



Source: City of Spokane, 2025

2. Historical Context

Racially disparate impacts are the result of direct and indirect policies and practices throughout history. Many of these actions entailed government support at all levels and some were implemented directly by government. The legacy of these policies continues to impact where present day Spokane residents can live, the quality of investments and services available to them, their homeownership opportunities, and access to generational wealth.

2.1 Tribal History and Settlement

The Spokane River has drawn people to the area for thousands of years and is part of the ancestral landscape of the Spokane Tribes of Indians, Coeur d'Alene Tribe, and Kalispel Tribe of Indians. The Spokane River and salmon were the reasons for native people gathering in this area, and continuous urban centers have flourished over the millennia, including at the confluence of Hangman Creek and the Spokane River.[8] The Spokane Tribe and visitors from the Coeur d'Alene, Nez Perce and Palouse country gathered at the Spokane Falls to trap, dry and store many thousands of pounds of salmon.

The **Spokane Tribe of Indians** have called this area home for time immemorial. Their ancestors were a river people, living a semi-nomadic way of life hunting, fishing, gathering, according to the Spokane Tribe of Indians tribal history.[9] They lived along the banks of the Spokane and Columbia Rivers and the tributaries in much of northeastern Washington, which consisted of approximately three million acres. During salmon runs, other tribes joined the Spokanes at the falls for fishing, trade, games, celebration, and socializing. The name "Spokane" is often translated as "children of the sun."

In the 1800s, U.S. soldiers arrived and displaced the Spokanes from their ancestral land as White settlement increased. In 1858, with no treaty established or adequate communications from the Federal Government, the Spokane's defended their families and country as U.S. soldiers marched through their country. Settlement increased within the area in the 1870s as the first sawmill was built, followed by stores, churches, schools, banks, hotels, saloons, and a newspaper. In 1881, President Rutherford B. Hayes formally established the Spokane Indian Reservation of approximately 154,602 land acres known as Chief Lot's reservation, which was located northwest of the present city.

From 1908, dams on the Spokane River displaced the Spokane Tribe's salmon-based way of life, further removing them from their ancestral homelands and way of life. In 1951, the Spokane Tribe officially became one of 574 recognized tribal governments within the United States following the passage of their formal Constitution that governs them today. Today, the Spokane Tribe of Indians primary government operations are located in Wellpinit, WA with a citizen population of approximately 2,900 enrolled members. The people of the Spokane Tribe have persevered through loss of land, forced relocation, and loss of their economic and spiritual base, the salmon.

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[8] Spokane Riverkeeper. *Spokane River History.* https://www.spokaneriverkeeper.org/history-1
[9] Spokane Tribe of Indians. *The History of the Spokane Tribe of Indians.* https://www.spokanetribe.com/history/

The **Coeur d'Alene Tribe** has been in this area for many thousands of years, and was known as Schitsu'umsh, meaning "Those who were found here" or "The discovered people".[10] The tribes' original homeland spans almost five million acres, stretching from Montana in the east to the Spokane River Valley, from near the Canadian border in the north to near the confluence of the Snake and Clearwater Rivers in north Idaho. Villages were established along the Coeur d'Alene, St. Joe, Clark Fork and Spokane Rivers. The Coeur d'Alene Indian Tribe has a current enrollment of over 2,190 members. The tribe has sovereign authority on a reservation covering 345,000 acres of mountains, lakes, timber and farmland, spanning the western edge of the northern Rocky Mountains and the abundant Palouse country.

The **Kalispel Tribe of Indians** traditional homeland surrounds the Pend Oreille River. It included the mountains, river, lakes and prairies that stretch from Lake Pend Oreille in North Idaho to where Paradise, Montana now stands and northwestward across northeastern Washington to the mouth of the Salmo River in British Columbia.[11] From 1880 to 1910, as more white settlers moved into Kalispel territory, the Tribe witnessed its land disappearing. The Kalispel Reservation was established on March 23, 1914 and is located in Usk, Washington. The Tribe also has Trust Land that includes a half square mile in the neighboring City of Airway Heights. The Kalispel Tribe includes 470 members, with a third of members live on the Reservation, a third live in Spokane, and a third live throughout the rest of the United States.

City of Spokane Historic Context

The removal of the Spokanes and other tribes opened the site of Spokane to homesteaders, and soon after settlers began arriving in the early 1800s.[12] By the late 1850s increasing numbers of White people were encroaching on tribal lands in pursuit of newly discovered gold in the Columbia River and its tributaries. Spokane became an incorporated city on November 29, 1881, with about 1,000 residents, encompassing 1.56 square miles. In 1880, just a year before incorporation, there were only 350 White people living in the town of Spokan Falls. By the time of the next census in 1890, Spokane residents had dropped the "Falls" from the town's name (and added an "e") and the city's population had increased to over 19,000 people. That number continued to grow and when the 1910 census was taken, over 100,000 Spokane residents were counted.

The expansion west brought mining, railroad, and timber industries, which also brought new immigrants from all over the world in the 1800s, including people from China and Japan who helped build local industries and established Spokane's Chinatown on Front Street.[13] According to the history provided by Spokane Historical, Spokane's Chinatown began in the 1880s and was at first mostly populated by Chinese laborers who had immigrated in the 1850s and 1860s to work in the local railroad and mining industries, with Japanese immigrants arriving in the 1890s. Many Chinese and Japanese businesses were destroyed in the Spokane Fire of 1889 and the population of Chinese

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[10] Coeur d'Alene Tribe. *Ancestral Lands.* https://www.cdatribe-nsn.gov/our-tribe/tribal-lands/
[11] Kalispel Tribel of Indians. *Our Story.* https://kalispeltribe.com/our-story
[12] City-County of Spokane Historic Preservation Office (SHPO). (2023). *East Central Historic and Cultural Context.* https://www.historicspokane.org/eastcentral
[13] Reames, Nicolette. (n.d.). "*Spokane's Chinatown*." Spokane Historical, accessed September 2, 2025, https://spokanehistorical.org/items/show/400

residents declined, partly due to the Chinese Exclusion Act of 1882 that prevented Chinese laborers from immigrating and denied recently-arrived Chinese citizenship. In 1921, Washington State passed the Alian Land Law which barred Asians from owning land, and the number of Japanese families declined in Spokane.[14] WWII reversed this trend, however, when Spokane became a haven for Japanese families fleeing the threat of Internment camps on the West Coast, many of whom settled into what became known as Trent Alley. In 1974, the remaining buildings and courtyards of Trent Alley were destroyed to facilitate construction for Expo '74.[15]

African Americans began migrating to Spokane in the late 1800s, when the Great Northern Railroad brought Black workers to the area.[16] Early families established businesses and organizations that served the growing Black population, including Peter B. Barrow, Sr. who established Spokane's Calvary Baptist Church in 1890, the oldest and longest-serving African-American Baptist Church in the State of Washington.[17] Initially, Spokane's Black community was not confined to a specific area, however segregation later developed through local policies enacted on racial covenants and redlining, eventually concentrating the Black community in the East Central neighborhood. This history is explored more in **Section 2.3 Housing Segregation in Spokane**.

2.2 Housing Segregation in Spokane

2.2.1 Racially Restrictive Covenants

Racially restrictive covenants were deed restrictions that kept homes from being sold to non-White racial or ethnic groups and were frequently applied during the first half of the 20th century.[18] Restrictive covenants were used by developers to increase the desirability of new neighborhoods for White homeowners and to prevent the establishment of other groups into their neighborhoods. **See Figure 3**. This resulted in segregated residential neighborhoods and reduced opportunities for disfavored groups to own a home.

Figure 3. Example of Racially Restrictive Covenant in Spokane

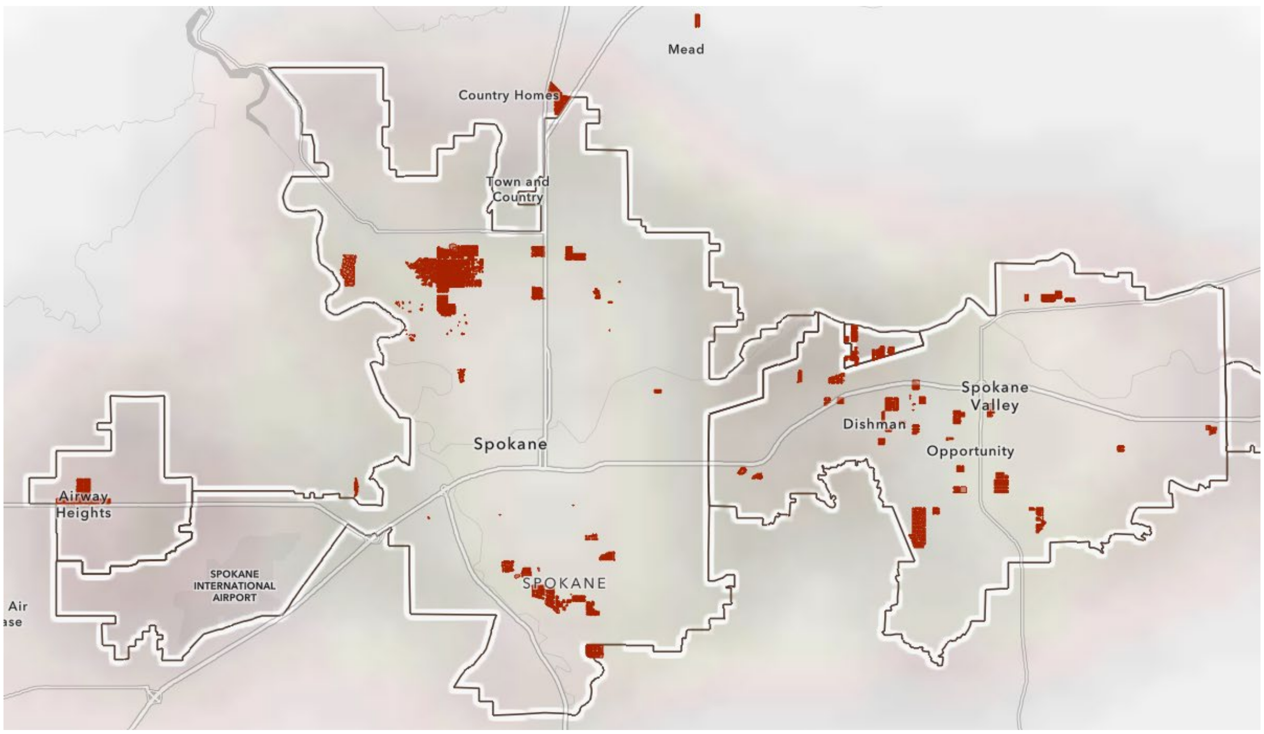
(c) No race or nationalty other than the white race shall use or occupy any building on any lot, except that this covenant shall not prevent occupancy by domestic servants of a different race or nationality employed by an owner or tenant.

Source: The Local History. (2016). https://thelocalhistory.com/interesting-bits/mapping-segregation-racially-restrictive-covenants-in-spokane/

[14] Northwest Fair Housing Alliance (NWFHA). (2020). *Systemic Residential Race Discrimination in Spokane - A 6 Minute History.* https://www.facebook.com/watch/?v=2720561091490253
[15] Reames, n.d.
[16] NWFHA, 2020
[17] Wyngaert, Whitney. (n.d.) *Early African-American Pioneers in Spokane*. Spokane Historical. https://spokanehistorical.org/items/show/738
[18] Commerce, 2023a

White property owners added racial restrictions to over 7,000 lots in Spokane County between the 1920s and 1950s.[19] See Figure 4. Covenants were most common in Spokane in the northwest part of the city and on the South Hill. They were often applied to entire neighborhoods when an addition or subdivision was surveyed and platted, but they were also included in deeds when a single lot changed hands. Although covenants were agreements between private groups, they still required government action to record and enforce. Racial covenants were struck down as unenforceable by the Supreme Court in 1948 and discrimination based on race was banned by the 1968 Fair Housing Act, however difficulties securing home loans, obtaining fair interest rates, and disparities in access to credit persist to this day.

Figure 4. Location of Racial Covenants in Spokane County



Source: EWU, 2024.

2.2.2 Redlining

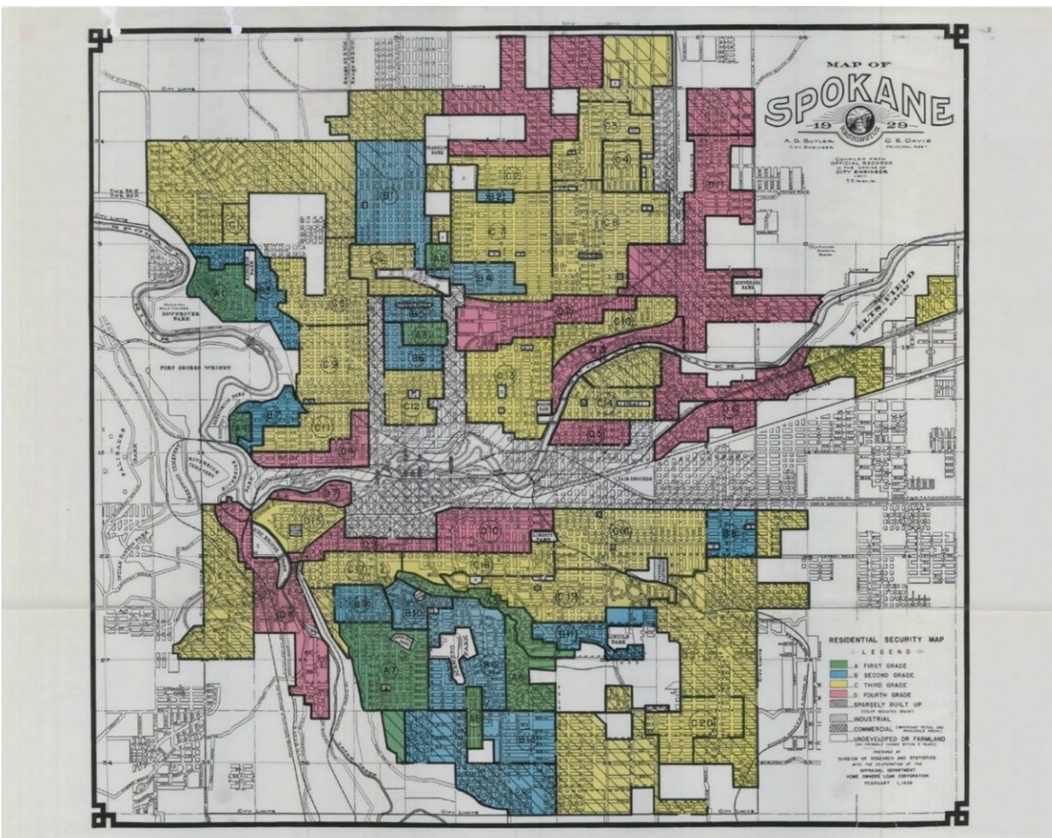
Redlining was the practice of denying financial services to residents of certain areas based on race or ethnicity, and has also had a lasting impact on communities nationwide. During the Great Depression, the US government created the Home Owners' Loan Corporation (HOLC) for the purpose of increasing access to home mortgages. To minimize risk, the HOLC created maps with ratings of the stability and desirability of each area and used the maps to limit loan guarantees. The HOLC developed the ratings with criteria that were explicitly biased against minority racial or ethnic groups as well as low-income households. Lenders, loan officers, and realtors used these maps to steer investments into White, predominantly higher-income areas, while "risky" areas, colored in

[19] Eastern Washington University (EWU). (2024). *Racial Restrictive Covenants Project.* https://ewuracialcovenants.org/map/

yellow and red on the maps, were excluded. Homogeneity (i.e. White-only areas), neighborhood quality (i.e. households with high income), and other attributes of neighborhoods were used in rating areas of Spokane. [20]

In the HOLC map from 1938, areas of Spokane were categorized into "grades" – the first grade in green signified the lowest risk for lending (A), blue was moderate (B), yellow was declining (C), and the fourth grade, indicated in red, signified a "hazardous" risk area for lending (D).[21] **See Figure 5.** The ratings played a significant role in influencing outcomes like homeownership opportunities and property values by disproportionately preventing people of color from accessing credit and buying homes. Though the practice of redlining is no longer legal, its legacy continues to negatively impact communities of color through the historic lack of investment in yellow and red neighborhoods and the exclusion of those communities from transferring wealth to younger generations. **See Figure 6 for example of HOLC scan.**

Figure 5. Spokane Residential Security "Redlining" Map, 1938



Source: Mapping Inequality, University of Richmond

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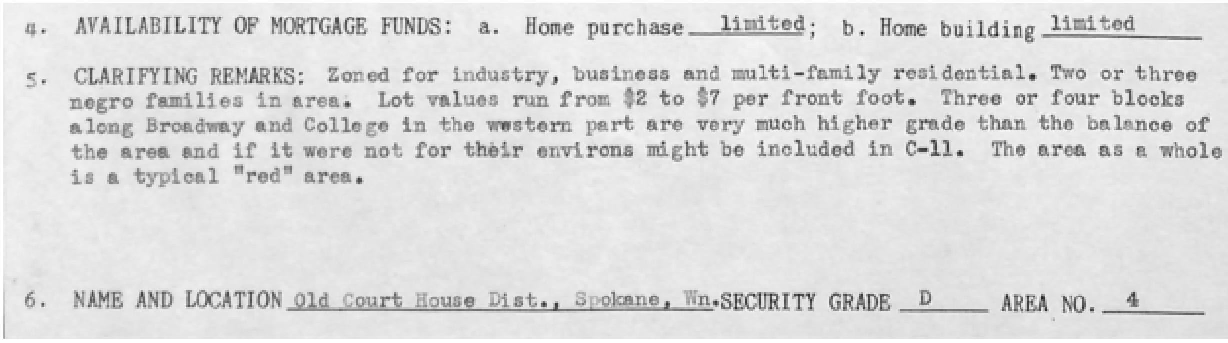
[20] Commerce, 2023a

[21] The Digital Scholarship Lab. University of Richmond. (2025). *Mapping Inequality.* https://dsl.richmond.edu/panorama/redlining/map/WA/Spokane/areas#loc=12/47.668/-117.3898

Figure 6. HOLC Scan for Area D4, Old Court House District, Spokane, 1938


4. AVAILABILITY OF MORTGAGE FUNDS: a. Home purchase limited; b. Home building limited

5. CLARIFYING REMARKS: Zoned for industry, business and multi-family residential. Two or three negro families in area. Lot values run from $2 to $7 per front foot. Three or four blocks along Broadway and College in the western part are very much higher grade than the balance of the area and if it were not for their environs might be included in C-11. The area as a whole is a typical "red" area.

6. NAME AND LOCATION Old Court House Dist., Spokane, Wn. SECURITY GRADE D AREA NO. 4

Source: Mapping Inequality, University of Richmond (2025)

The University of Richmond's Digital Scholarship Lab collaborated with the National Community Reinvestment Coalition to create *Not Even Past: Social Vulnerability and the Legacy of Redlining*, a project that juxtaposes redlining maps from the 1930s with contemporary health disparities.[22] The Social Vulnerability Index (SVI) from the Center for Disease Control provides an index to evaluate demographic and socioeconomic factors (such as poverty, lack of access to transportation, and crowded housing) that adversely affect communities that encounter hazards and other community-level stressors.[23] The SVI provides insight into where communities are more susceptible to those hazards or stressors and may lack the resources to adapt or respond, with areas closer to 1 having a higher vulnerability risk.

Comparing the HOLC map with the SVI, data shows that areas that were graded as A and B on the Spokane HOLC maps have lower social vulnerability today and areas that were graded as C and D have higher social vulnerability today.[24] When looking at the population data, areas graded C or D have higher percent of minority population today than areas that were graded A or B. Similarly, areas graded C or D also have lower life expectancy and higher percentage of poverty. No areas graded A or B on the HOLC map indicated a presence of a Black population, while 20% of the areas graded C and 60% of the areas graded D had a Black population. Areas that had a Black population indicated on the HOLC maps have a higher percentage of minority population today than areas that did not, as well as lower life expectancy and higher percentage of poverty—even higher than the areas graded D regardless of the presence of a Black population. **See Table 1.**

[22] The Digital Scholarship Lab and the National Community Reinvestment Coalition, "Not Even Past: Social Vulnerability and the Legacy of Redlining," *American Panorama*, ed. Robert K. Nelson and Edward L. Ayers, https://dsl.richmond.edu/socialvulnerability

[23] Centers for Disease Control (CDC). *CDC/ATSDR Social Vulnerability Index (SVI).* [2022]. Database [Washington]. https://www.atsdr.cdc.gov/place-health/php/svi/index.html

[24] The Digital Scholarship Lab

Table 1. HOLC Graded Areas and Social Vulnerability

HOLC Graded Areas	% Minority Population	% Population in Poverty	Life Expectancy in Years	Social Vulnerability Index
A (Green)	8%	12%	78.5	0.31
B (Blue)	14%	14%	77.3	0.42
C (Yellow)	17%	25%	74.3	0.64
D (Red)	19%	29%	73.9	0.65
Areas Noted with Black Population	20%	30%	72.7	0.70

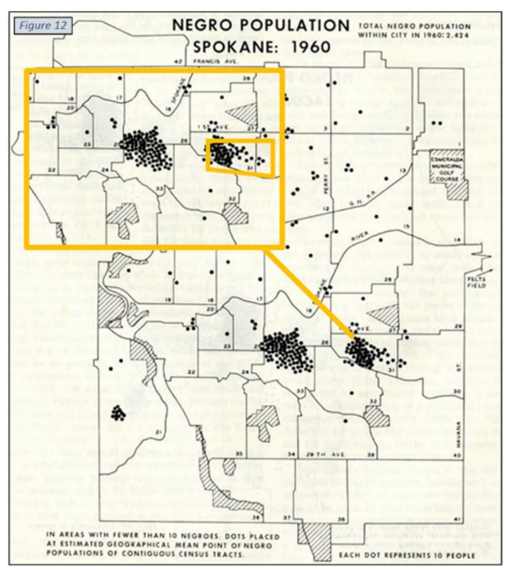
Source: The Digital Scholarship Lab, "Not Even Past: Social Vulnerability and the Legacy of Redlining"

2.2.3 Housing Discrimination

Based on the practices of racially restrictive covenants and redlining, Spokane has a legacy of housing discrimination, including discrimination against African Americans who have been in Spokane since the days of the Washington Territory.[25] As population grew in the early 1900s, so did racial discrimination, with Black residents in Spokane increasingly steered into the East Central neighborhood starting in the 1940s. East Central, which had a diverse immigrant population from its establishment including many Italian families, had already been facing a post-war economic decline for decades. Spokane's Black population doubled from 1940 to 1950, and gained an additional 50% from 1950 to 1960, eclipsing one percent of the city's total population for the first time. This rapid growth in the number of Black Spokane residents intensified segregation, particularly in housing. By the 1960s, nearly a quarter of the Black population in Spokane lived in East Central, and the area around the 5th Avenue Business District became a residential center of Spokane's Black community.

When the 1938 HOLC map was created, East Central's Black population made up about 1% of the total, which was similar to the city as a whole. But by 1960, the Black population in East Central was larger than anywhere in the city except for downtown.[26] See Figure 7. As redlined, the properties in East Central were uninsured, which discouraged homeownership and encouraged renting. **Within two decades, Spokane shifted from a city where Black residents had relative freedom in housing choices to a city with a clearly defined Black neighborhood with vast swaths of residential land off-limits to Black residents.**

Figure 7. Black Population in Spokane, 1960.



Source: Spokane Historic Preservation Office, 2023

Nationally across the United States, there was a lack of investment in neighborhoods of color, which meant that redlined areas were more likely to be marked as blighted and slated for urban renewal projects including

[25] Spokane Historic Preservation Office, 2023
[26] Spokane Historic Preservation Office, 2023

federal highway construction.[27] In many cases, interstate routes were chosen based on areas where land costs were the lowest or where political resistance was weakest. In practice, this meant that low-income and communities of color, bore the burden of displacement caused by the development of divisive highway infrastructure.

East Central fell into the pattern of demolition for freeways was caused to many other redlined neighborhoods, and East Central was targeted for the construction of I-90 in the 1950s. When completed, I-90 bisected the neighborhood, displaced over a thousand residents, devasted the local economy, and significantly reduced the size of Liberty Park, an esteemed park planned by the Olmsted Brothers that had fallen into disrepair. The scars of redlining in East Central remain, a reminder of the legacy of housing discrimination in Spokane and a cause for action to address it going forward.

2.3 Zoning and Land Use

Zoning and other land use practices enacted by cities emerged in the 20th century and furthered the pattern of discrimination and shaped racially disparate impacts that are perpetuated today, as outlined by the WA State Department of Commerce.[28] Local zoning originated in the early 1900s as a tool to address growth and industrialization. From its beginning, zoning laws have been used to segregate households by race and ethnicity. The American Planning Association explains that "zoning, which is intended to separate incompatible land uses, has also been used to exclude certain population groups from single-family neighborhoods and to exclude multifamily rental housing from neighborhoods with better access to jobs, transit, and amenities."[29]

Cities often applied zoning in higher-income areas to limit housing types to single-family housing or to impose large minimum lot size requirements. In these areas, households with higher incomes could afford the extra land and larger houses required by local codes. These limitations artificially suppressed the production of new housing in middle- and upper-income neighborhoods, further limiting housing opportunities for lower- and moderate-income households, many of which include people of color. These practices are often referred to as "exclusionary zoning" because of their effects.

Comparison of HOLC maps can be made with the City of Spokane zoning map from 2006, which is shortly after the City adopted the first Growth Management Act compliant comprehensive plan in 2001, *Shaping Spokane*. Spokane, like many cities, has historically zoned a majority of residential areas for single units. **As the City's Planning Department zoned residential areas, areas that were graded A and B coincided with areas that have a higher percentage of single unit zoning than areas that were graded C and D.** See Figure 8. Analysis demonstrates that:

- Areas graded A in Spokane were almost exclusively zoned for single units at 98%, while areas graded D had much lower representation at 59.6% single unit zoning.

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[27] Commerce, 2023a

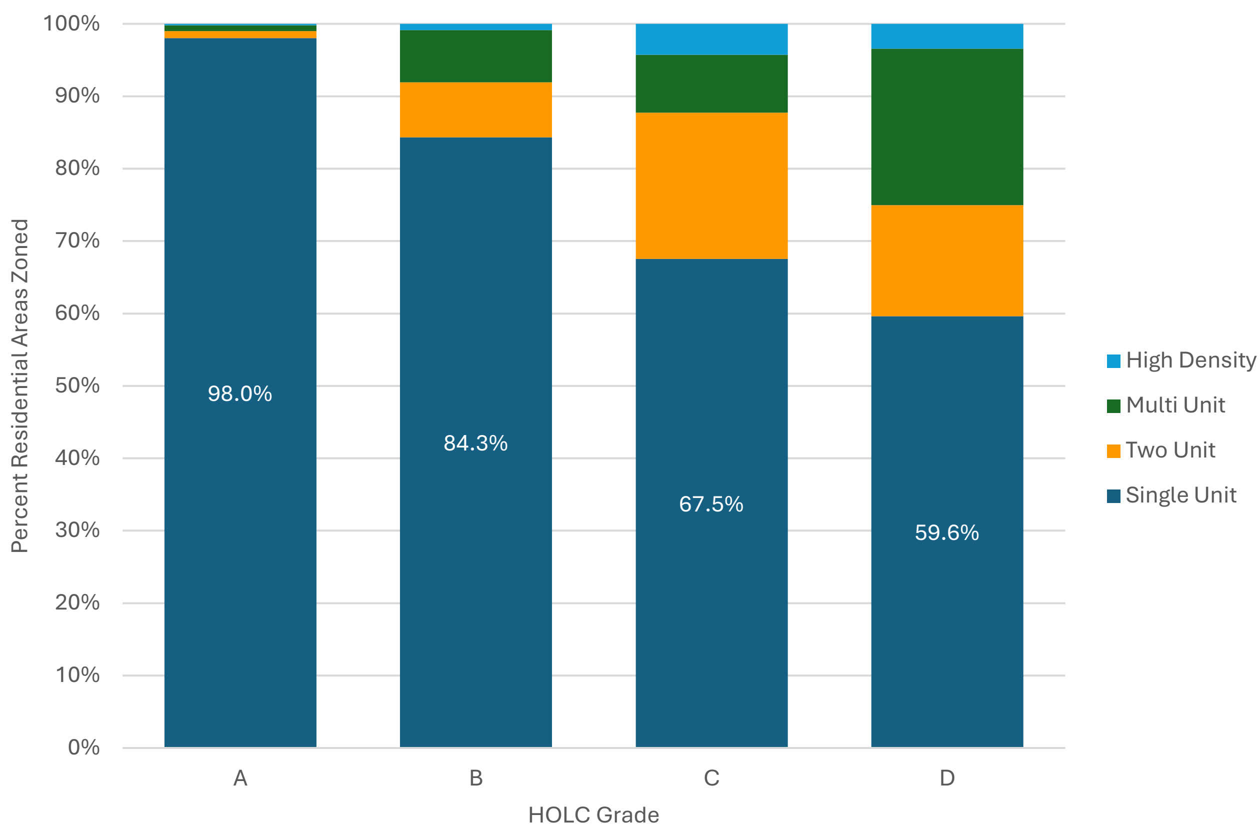
[28] Washington State Department of Commerce. (2020). *Guidance for Developing a Housing Action Plan.* https://deptofcommerce.box.com/shared/static/pophc16jetggsctctmnbjomm0qa7tpu8.pdf

[29] American Planning Association. (2019). *Planning for Equity Policy Guide.* American Planning Association. https://www.planning.org/publications/document/9178541/

- Areas graded D had higher percentage of multi-unit zoning than other graded areas, suggesting higher rates of apartments and fewer homeownership options.
- Areas graded C had a higher percentage of two-unit zoning than other areas, suggesting more housing diversity and options for homeownership.

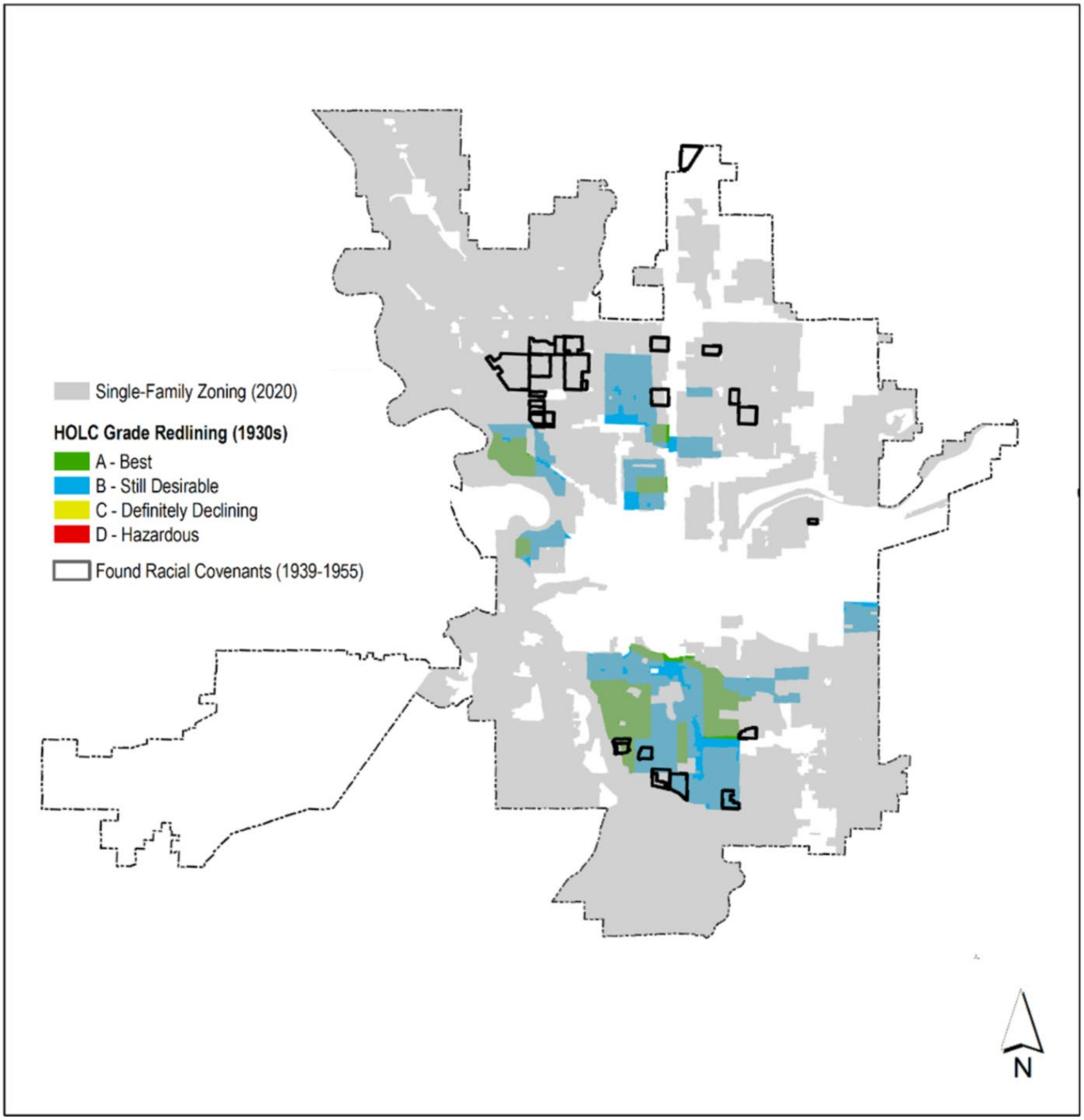
This comparison draws out the spatial pattern between redlining and historic zoning enacted by the City of Spokane, and identifying areas in Spokane that were rated as best and desirable through redlining and racially restrictive covenants that were further protected by zoning. **See Figure 9**

Figure 8. HOLC Grade by City of Spokane 2006 Zoning



Source: City of Spokane; Mapping Inequality, 2025

Figure 9. Single-Family Zoning and HOLC Grade



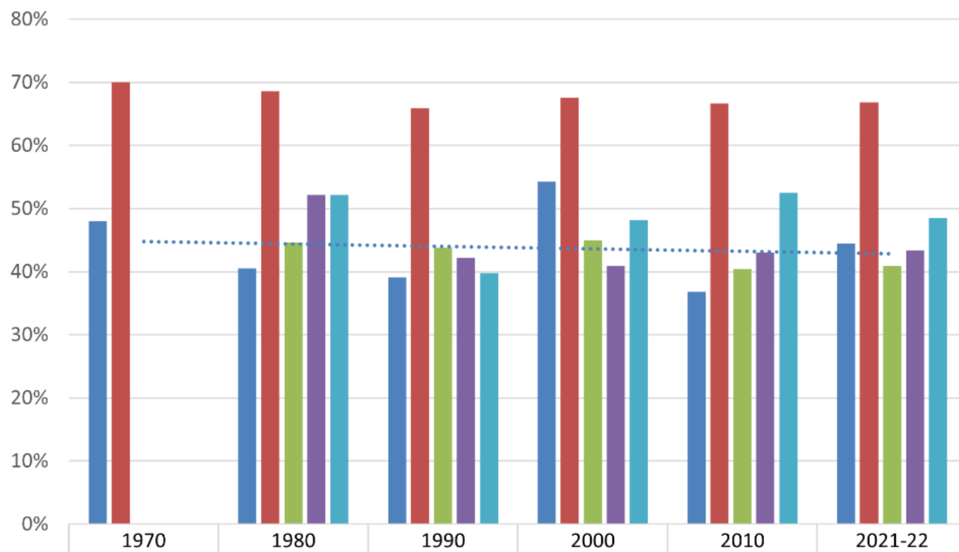
Sources: City of Spokane; EWU 2021; Mapping Inequality (2020)

2.4 Trends in Historic Homeownership Rates

The University of Washington Racial Restrictive Covenants Project shows homeownership rates and home values differentiated by race since 1970 for Washington State and for major counties in the state. **Statewide, about 69% of White families were homeowners in 2022 compared to 34% of Black families, which has decreased from 1970 when 48% of Black families owned homes.** [30]

In Spokane County, homeownership for households of color has consistently been less than homeownership for White households and has dropped since the 1970s.[31] Homeownership rates has varied over the decades, but by 2022, rates for all households of color in Spokane County had decreased at least 4 percentage points since 1970. Homeownership for White households has stayed constant with at least 66% since 1970. Two-thirds of White families are homeowners compared to 48% of Asian American families, 44% of Black families, 43% of Latinos, and 41% of Indigenous families. **See Figure 10**

Figure 10. Homeownership by Race, Spokane County, 1970-2022



	1970	1980	1990	2000	2010	2021-22
Black % owners	48%	41%	39%	54%	37%	44%
White % owners	70%	69%	66%	68%	67%	67%
Indigenous % owners		45%	44%	45%	40%	41%
Latino % owners		52%	42%	41%	43%	43%
Asian/PI % owners		52%	40%	48%	52%	48%

Source: UW Racial Restrictive Covenants Project, 2022. Note: Data is based on 1% samples of the population and may be subject to sampling error.

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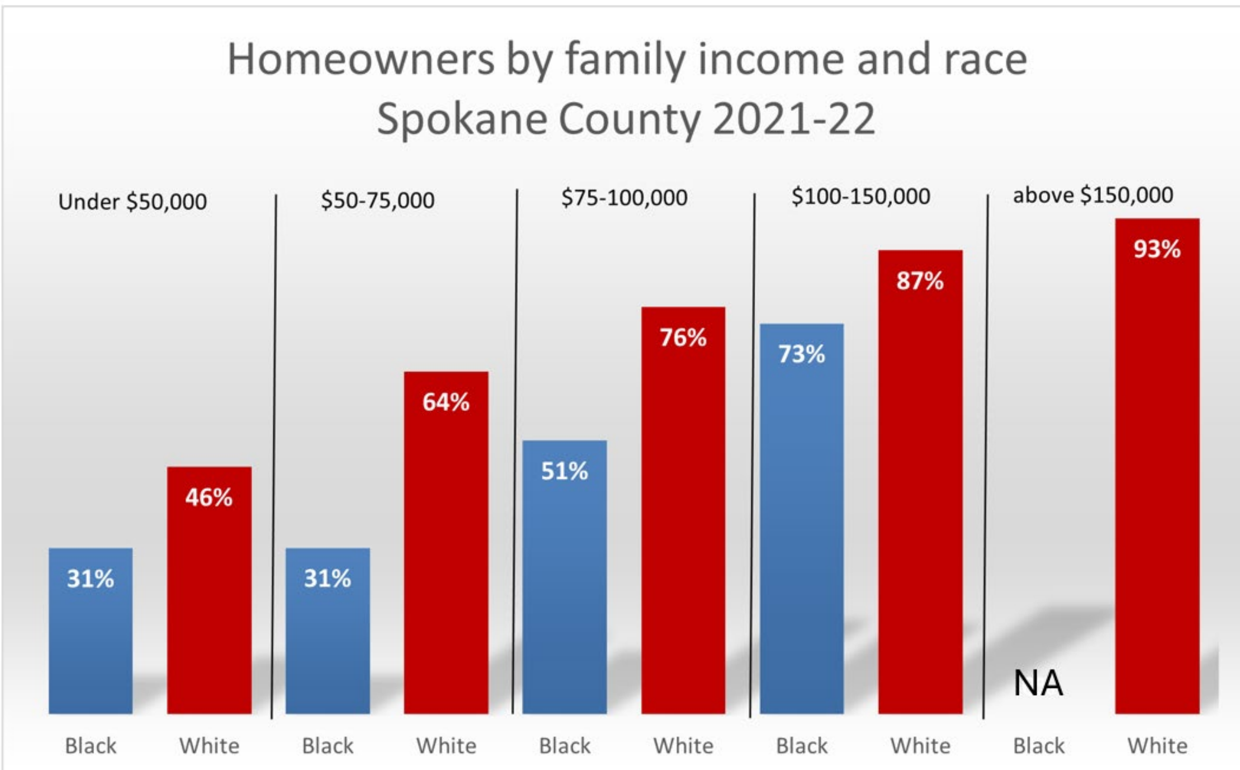
[30] University of Washington (UW). (2022a). Civil Rights & Labor History Consortium. *Racially Restrictive Covenants Project Washington State.* https://depts.washington.edu/covenants/homeownership.shtml

[31] University of Washington (UW). (2022b). Civil Rights & Labor History Consortium. *Racially Restrictive Covenants Project Washington State – Spokane County.* https://depts.washington.edu/covenants/homeownership_spokane.shtml

The disadvantage that families of color face is still present when considering income and homeownership. When comparing homeownership rates between While and Black households, at every income level, White families are more likely to own homes than Black families. See Figure 11. For families earning $100,000 to $150,000, there is a 14% ownership gap between Black and White households, which grows even larger at more modest income levels. For those earning between $50,000 and $75,000, 64% of White families were owners compared to only 31% of Black families. There were too few Black families in the income over $150,000 sample to report, demonstrating the disparity in high income earners that further suggests disparities in homeownership.

Figure 11. Homeowners by Family Income and Race, Spokane County, 2021-22



Source: UW Racial Restrictive Covenants Project, 2022. Note: Data is based on 1% samples of the population and may be subject to sampling error. There were too few Black families in the income over $150,000 sample to report.

3. Current Housing Experience

3.1 Community Context

The City of Spokane (referred to as Spokane) is the second largest city in Washington State with a population of 229,447 in 2023.[32]

Population Highlights **(See Table 3)**:

- 78.5% of the population identify as White, Not Hispanic.
- Black, Indigenous, and People of Color (BIPOC) populations in Spokane account for 21.5% of the total population.
- The largest racial or ethnic group alone, other than White, is Hispanic or Latino at 7.8%, followed by multi-racial at 9.3%. Asian and Black or African American populations have similar rates at 2.9% and 2.7% respectively, while American Indian and Alaska Native and Native Hawaiian and Other Pacific Islander populations each account for 1% or less of Spokane's population.
- There are close to 81,000 White, Not Hispanic households (83.6% of households), and close to 16,000 BIPOC households (16.4% of households), totaling just over 95,000 households.
- 8.5% of the population 5 years and over, or 18,432 individuals, speaks a language at home other than English:
    - 2.8% speaking Spanish (6,163 individuals),
    - 2.5% speaking Indo-European languages (5,492 individuals),
    - 2.2% speaking Asian and Pacific Islander languages (4,834 individuals), and
    - 0.9% speaking other languages (1,943).

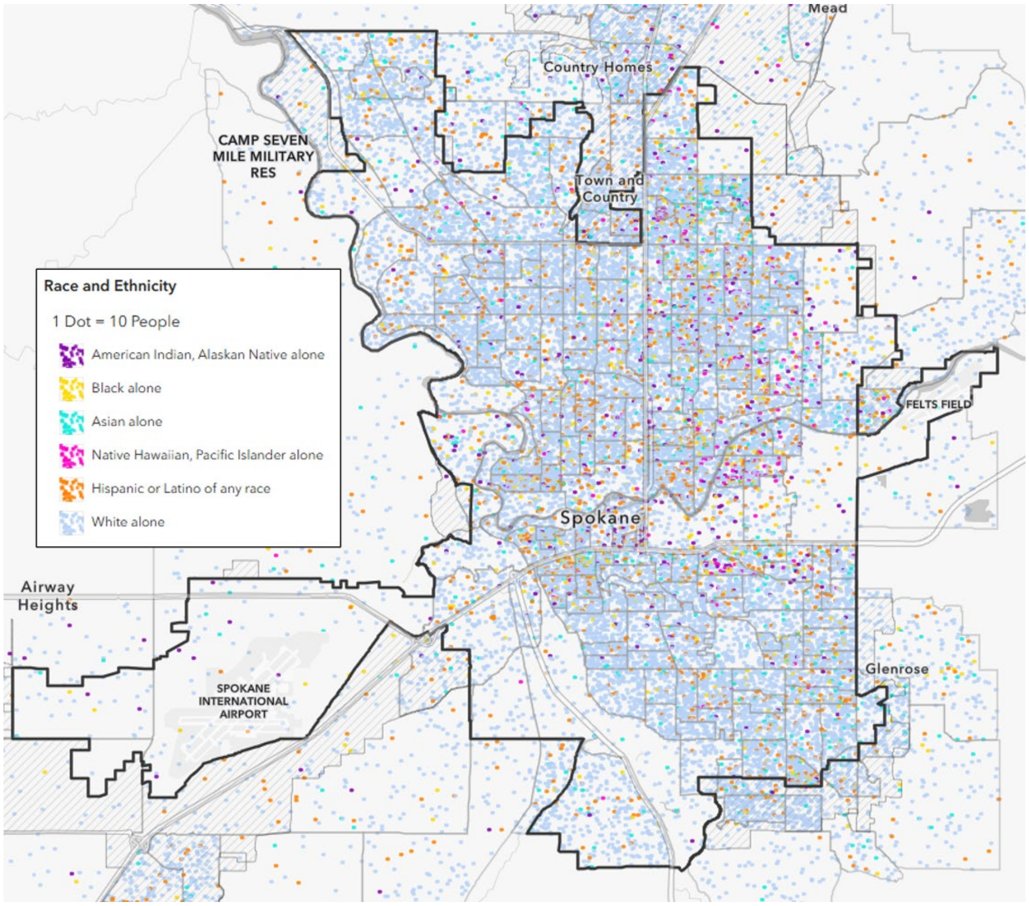
Table 2. Spokane Population by Race, 2023

Race/Ethnicity	2023	% Pop
White, Not Hispanic alone	179,992	78.5%
Black or African American alone	6,162	2.7%
American Indian and Alaska Native alone	3,006	1.3%
Asian alone	6,595	2.9%
Native Hawaiian and Other Pacific Islander alone	1,853	0.8%
Some Other Race alone	4,729	2.1%
Two or More Races	21,297	9.3%
Hispanic or Latino	17,904	7.8%

Source: U.S. Census Bureau, U.S. Department of Commerce. American Community Survey, 2023: 5-Year Estimates, Table DP05

[32] U.S. Census Bureau, U.S. Department of Commerce. American Community Survey, 2023: 5-Year Estimates, Table DP05

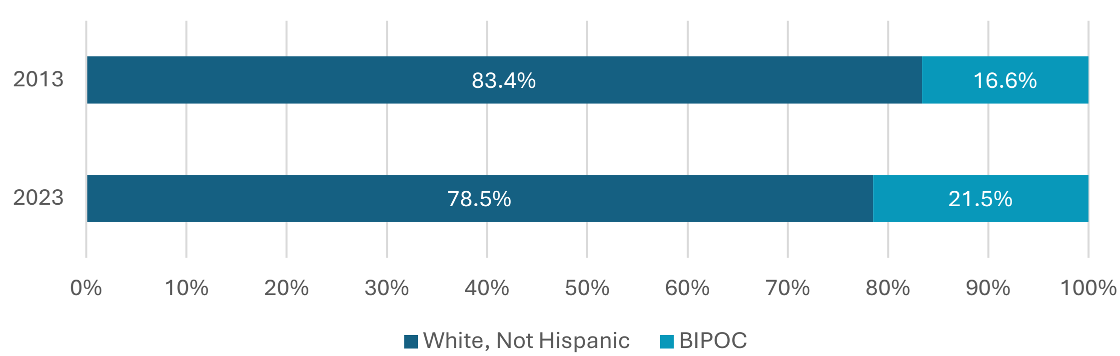
Figure 12. Racial Dot Map



Source: City of Spokane, Spokane Climate Vulnerability Index

From 2013 to 2023, Spokane gained close to 20,000 residents, an increase of 9.4%. During this time, the city became more diverse with the **proportion of BIPOC residents increasing from 16.6% to 21.5%** of residents while the proportion of the White, Not Hispanic or Latino residents decreased from 83.4% to 78.5% of residents. **See Figure 13**

Figure 13. Race and Ethnicity Composition, 2013 & 2023



Source: City of Spokane; U.S. Census Bureau. American Community Survey, ACS 5-Year Estimates Data Profiles 2013 & 2023, Table DP05.

Most of the population growth from 2013 to 2023 is seen in people who identify as multiracial (Two or More Races) and Hispanic or Latino population of any race. Other populations that more than doubled include the Native Hawaiian and Other Pacific Islander population and people identifying as Some Other Race. Smaller increases were seen in the Asian population, while the American Indian and Alaska Native population decreased during this timeframe. See Table 3

Table 3. Population Demographic Change, 2013 – 2023

Race/Ethnicity	2013	2023	% Pop	2013-2023 Pop Change	2013-2023 % Change
Total Population	209,478	229,228	-	19,750	9.4%
White, Not Hispanic alone	174,730	179,992	78.5%	5,262	3.0%
Black or African American alone	5,461	6,162	2.7%	701	12.8%
American Indian and Alaska Native alone	3,441	3,006	1.3%	-435	-12.6%
Asian alone	6,392	6,595	2.9%	203	3.2%
Native Hawaiian and Other Pacific Islander alone	882	1,853	0.8%	971	110.0%
Some Other Race alone	2,175	4,729	2.1%	2,554	117.4%
Two or More Races	9,454	21,297	9.3%	11,843	125.3%
Hispanic or Latino (or any race)	11,158	17,904	7.8%	6,746	60.5%

Source: City of Spokane; U.S. Census Bureau. American Community Survey, ACS 5-Year Estimates Data Profiles 2013 & 2023, Table DP05.

Multiracial Population: Two or More Races

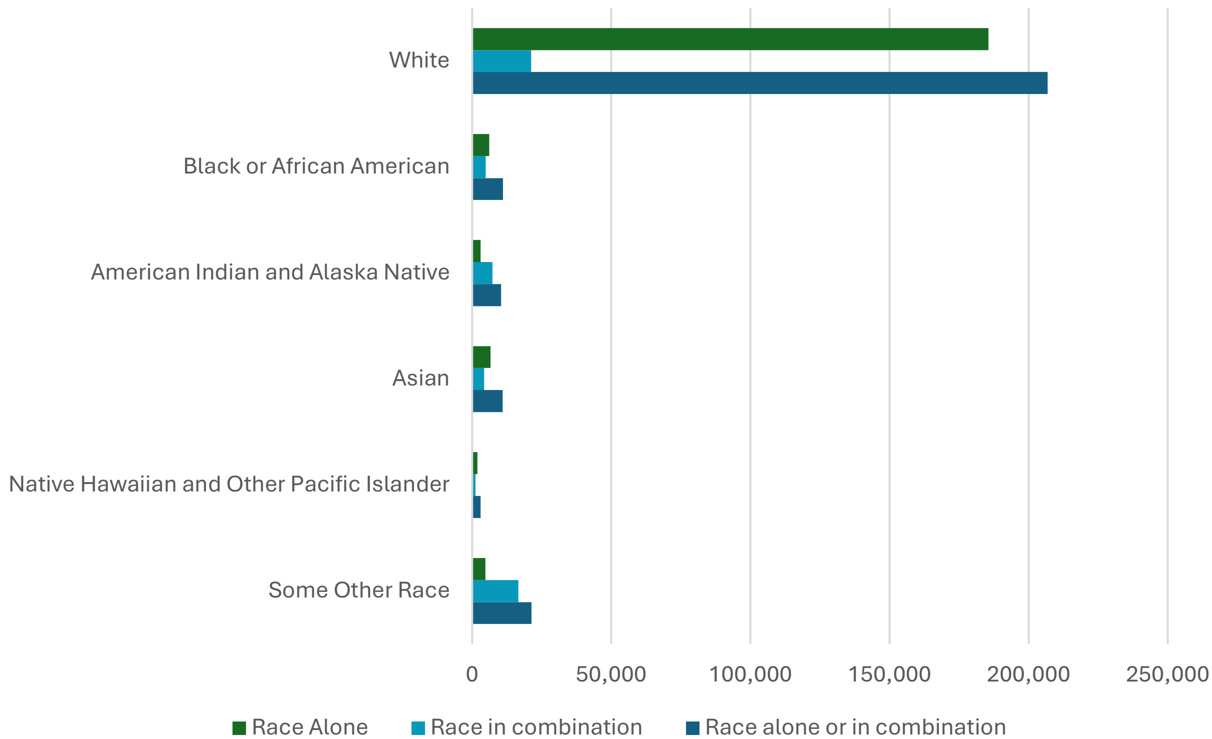
As Spokane is becoming more diverse, the city is seeing an increase in its multiracial population. When exploring the racial combinations that make up the multiracial category further, additional diversity beyond the race alone categories is revealed. In 2020, White multiracial was the largest category for Two or More Races, with an additional 21,000 people more than White alone in Spokane.[33] The Some Other Race population was the second largest in combination race group, with an additional 16,000 people—over 11,000 more than the Some Other Race alone group. When combining race alone or multiracial population, the Some Other Race group is over 22,000 people in Spokane, jumping from 2.4% of the population to 9.6% of the population. See Figure 14

The American Indian and Alaska Native population in particular had a larger multiracial population than AI/AN alone. When combining race alone or multiracial population, the AI/AN group is over 11,000 people in Spokane, jumping from 1.9% of the population to 5.1% of the population. All other racial groups had smaller multiracial populations than race alone. Black multiracial and Asian

[33] U.S. Census Bureau, U.S. Department of Commerce. 2020 Decennial Census.

multiracial populations both had over 4,000 additional people, jumping the race alone group from over 2% each to a combined population over 4% each.

Figure 14. Multiracial Population Comparisons by Race



Source: City of Spokane; U.S. Census Bureau. American Community Survey, 2020 Decennial Census.

Urban Native Population

The increase in American Indian and Alaska Native population when exploring multiracial population points to the diversity of the urban Native community in Spokane. Spokane is the eighth-largest urban Indian city in the United States, and Spokane County has people from over 300 tribes.[34] For many Native communities, systemic issues like racism, poverty, and poor education have given rise to health disparities. The Urban Indian Health Institute provides a community health profile for the Spokane Urban Indian Health Program, published in 2021. The report gives context for how government policies have impacted urban Indians, starting with policies that forced relocation in the 1950s, and termination policies that forced assimilation into non-Native culture.[35] Indigenous people come to cities for educational, employment, or housing opportunities and health care needs, resulting in an Indigenous urban population that is diverse and inter-tribal. Race, lack of access to education, unemployment, poverty, and housing all create inequities between urban Native populations. Urban

[34] The Native Project. *Who We Are.* https://nativeproject.org/about-us/

[35] Urban Indian Health Institute, Seattle Indian Health Board. (2021). *Spokane Urban Indian Health Program: Community Health Profile & Individual Site Report.* Seattle, WA: Urban Indian Health Institute. https://www.uihi.org/uihp-profiles/spokane/

American Indians and Alaska Natives frequently experience higher proportions of poverty and inequities in mortality, disabled status, infant and maternal health, and access to health insurance when compared to their White, non-Hispanic counterparts.

Native people who do not reside on their reservation or territorial land have many different residential and cultural experiences, outlined in a report on *Urban Indian America* by the National Urban Indian Family Coalition (2008).[36] Spokane was highlighted in the report as one of 10 major metropolitan areas that had a significant proportion of Native people in the country. Urban Indians exhibit higher rates of mobility than non-Natives, both within the same county and moving from one county to a different county. One way to capture the diverse experiences to is consider the many reasons that urban Indians live in cities and the length of time they have done so, including:

- Long term: Residents in cities for several generations, including the Native people who traditionally owned the land on which the urban center is based.
- Forced: Those forced to relocate to urban centers by government policy or the need to access specialized health or other services.
- Permanent: Those who have permanently relocated from other areas in search of different or better opportunities.
- Medium and short term: Those who may visit for specific purposes but do not intend to stay permanently (as in visits to family, relocation to pursue higher education, etc.)

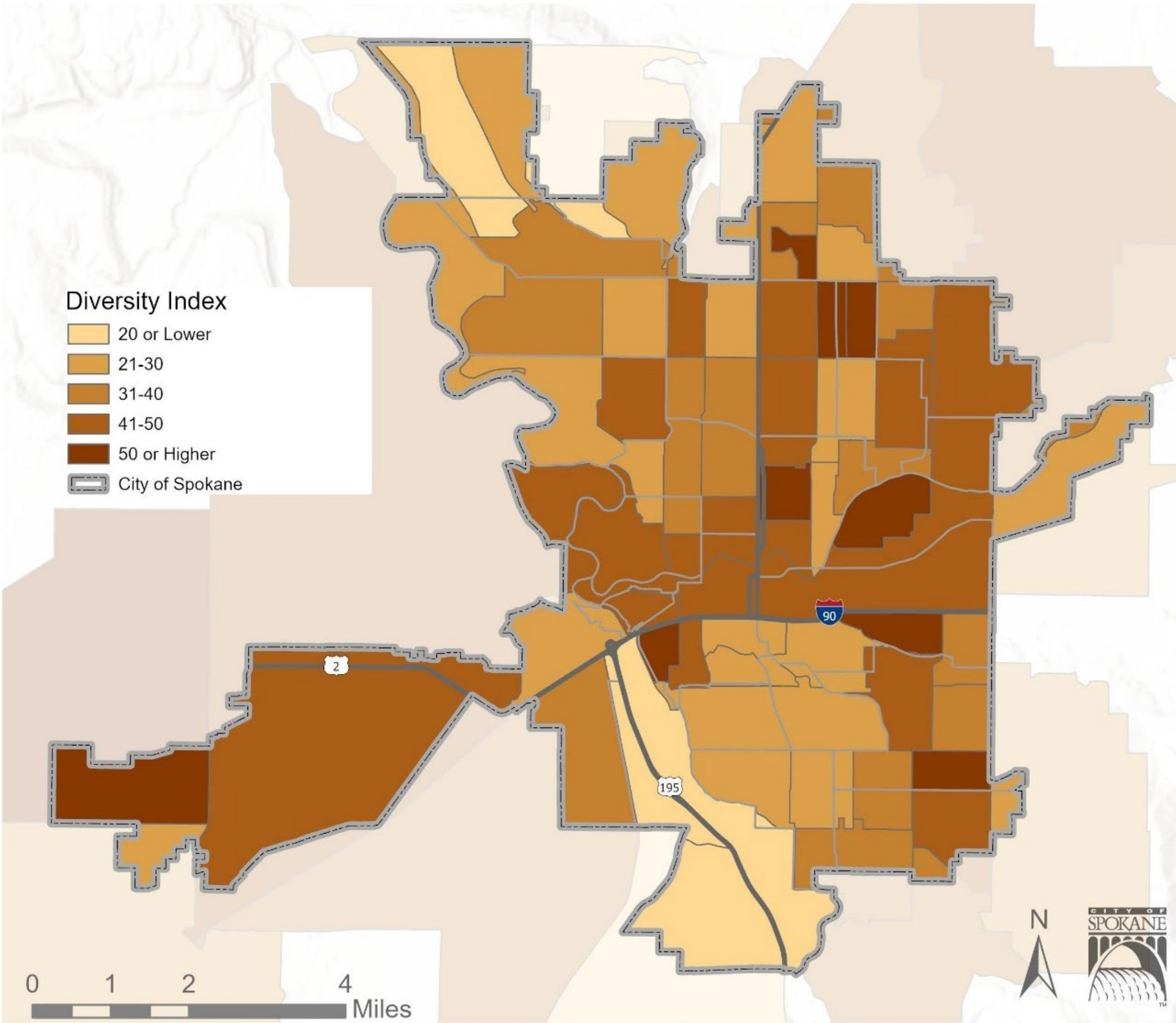
This discussion on the urban Native community is included to highlight the significance of the population in Spokane and the emphasis for further consideration. This Racially Disparate Impact Report is limited in scope and currently restricted to available data for American Indian and Alaska Native demographics, primarily using Census data based on the AI/AN race alone. In providing baseline information, this report encourages further investigation to better understand housing needs and priorities of the urban Indian population in Spokane with quality, accurate data.

Diversity Index

The Diversity Index is another way to look at the racial composition of an area.[37] The index shows the probability that two individuals chosen at random would be of different races or ethnicities. Spokane County has a diversity index of 32.57 as a whole, indicating a 32.57% chance that two people chosen at random in the county would be of different races. **See Figure 15.** Neighborhoods that have Census Tracts with a high diversity index (50 or higher) in the City of Spokane include Chief Garry Park, Whitman, Shiloh Hills, and Logan in Northeast Spokane, and East Central, Cliff-Cannon, and Lincoln Heights south of I-90.

[36] National Urban Indian Family Coalition. (2008). *Urban Indian America: A discussion paper addressing the status of American Indian & Alaska children and families today.* A Report to the Annie E. Casey Foundation. https://www.aecf.org/resources/urban-indian-america
[37] PolicyMap. (2023). Diversity Index. https://www.policymap.com/data/dictionary#Census%20and%20PolicyMap:%20Racial%20and%20Ethnic%20Diversity

Figure 15. Diversity Index



Source: City of Spokane; Policy Map, US Census 2019-2023 ACS 5-Year Estimates. Note: Many Census Tracts stretch beyond the City.

3.2 Homeownership

In 2023, 61% of White, Non-Hispanic households owned their home in Spokane. In comparison, only 42% of Black, Indigenous, and people of color households were homeowners, making a gap of 19 percentage points, known as the racial homeownership gap.[38] The racial homeownership gap refers to the disparity in homeownership rates between different racial and ethnic groups, particularly between White and Black Americans.[39] This gap has persisted for decades,

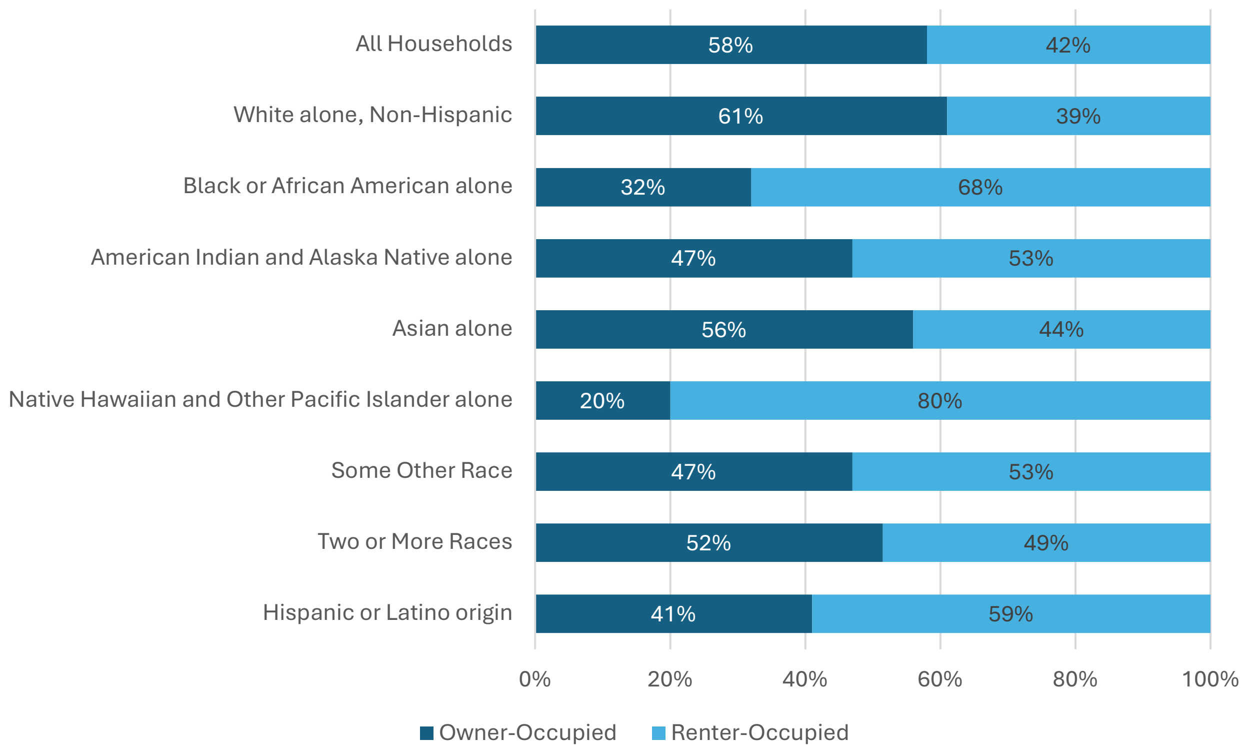
[38] The BIPOC homeownership rate is calculated by combining Black or African American, American Indian and Alaska Native, Asian, Native Hawaiian and Other Pacific Islander, and Hispanic or Latino origin homeownership data.

[39] Urban Institute. (2017). *Reducing the Racial Homeownership Gap.* https://www.urban.org/policy-centers/housing-finance-policy-center/projects/reducing-racial-homeownership-gap

with Black Americans consistently having lower homeownership rates than their white counterparts, and it is a significant contributor to the racial wealth gap. When looking at specific racial groups, the gap between White, Non-Hispanic households and Black households in Spokane was 29 percentage points, and 41 points for NHOPI households in 2023. See Figure 16

Compared to state and national levels, the homeownership rate for Black households in the city of Spokane is lower than WA State or the United States. The racial gap in homeownership rate is similar in Spokane as it is to the national level, but smaller than the racial gap at the State level.

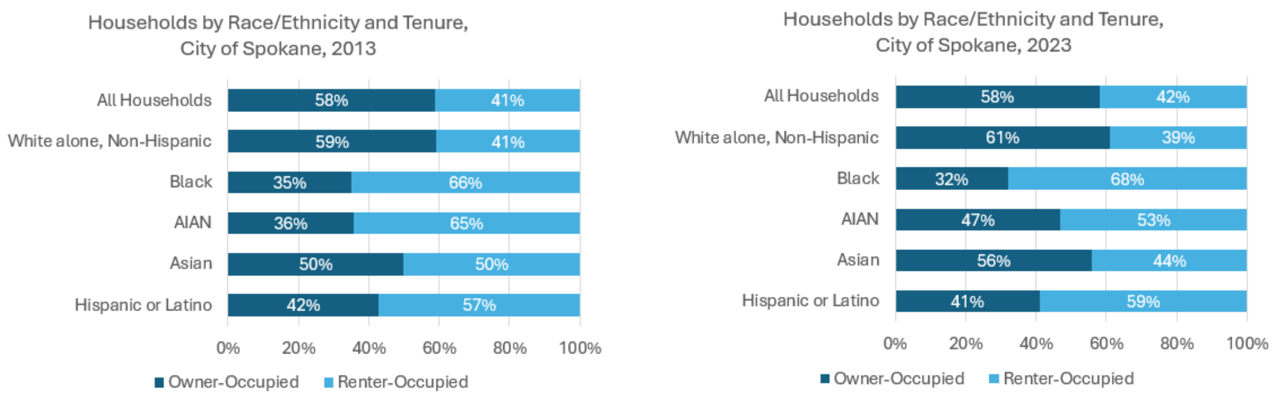
Figure 16. Homeownership by Race/Ethnicity and Tenure, 2023



Source: City of Spokane; U.S. Census Bureau, U.S. Department of Commerce. American Community Survey, 2023: 5-Year Estimates, Table S2502

Homeownership rates in Spokane have remained consistent for all households when comparing 2013 and 2023 data, at 58% owner-occupied and 42% renter-occupied. When looking at data by racial groups, **homeownership rates have increased for all racial groups since 2013 except for Black households and Hispanic/Latino households**, which have both decreased by 3% and 1% respectively. See Figure 17

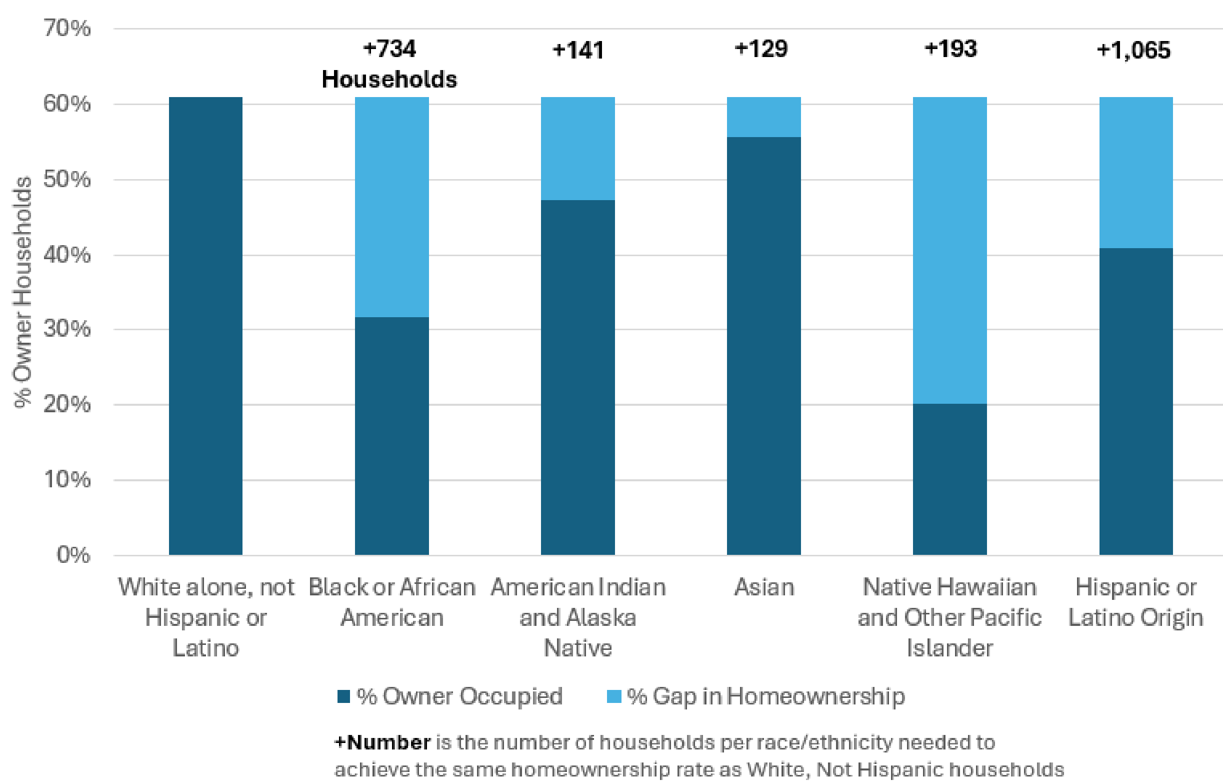
Figure 17. Households by Race/Ethnicity and Tenure, 2013 and 2023



Source: City of Spokane; U.S. Census Bureau, U.S. Department of Commerce. American Community Survey 2023: 5-Year Estimates and 2013: 5-Year Estimates, Table S2502. Note: Native Hawaiian and Other Pacific Islander households were omitted due to the margin of error in 2013 exceeding the population estimates.

Closing the homeownership gap will require an increase in homeownership for all populations of color. To achieve the same homeownership rate for BIPOC householders as White, Non-Hispanic householders, at 61%, there would need to be **2,261 more households of color as homeowners** in Spokane, using a 2023 snapshot. **See Figure 18.**

Figure 18. Gap in BIPOC Homeownership in Spokane, 2023



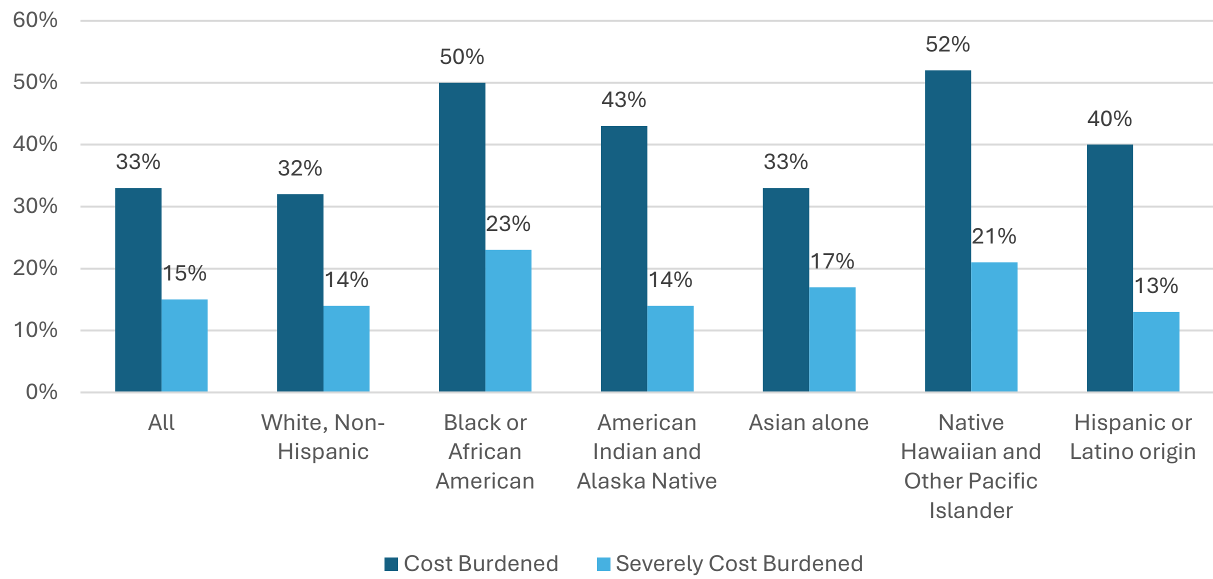
Source: City of Spokane; U.S. Census Bureau, U.S. Department of Commerce. American Community Survey 2023: 5-Year Estimates.

3.3 Housing Cost-Burden and Overcrowding

One indicator of a community's unmet housing need is the number of households that are experiencing housing "cost-burden," that is households that are paying more than 30 percent of their income on housing.[40] Households spending more than 50% of their income on housing costs are considered "severely cost-burdened." Households experiencing housing cost burden have limited resources left to pay for other life necessities such as food, clothing, medical care, transportation, and education. They are also at higher risk of displacement when housing costs rise, or life circumstances change. The risks increase in severity for lower income households in which remaining income may not cover basic needs.

In Spokane, 1 in 3 households are cost-burdened, with almost 1 in 6 severely cost-burdened. **Households of color have higher cost-burdened rates than White, Non-Hispanic households.** When looking at specific racial groups, half of Black and Native Hawaiian and Other Pacific Islander households are cost-burdened, and over 20% are severely cost-burdened. **See Figure 19.**

Figure 19. Housing Cost-Burden by Race/Ethnicity, 2023

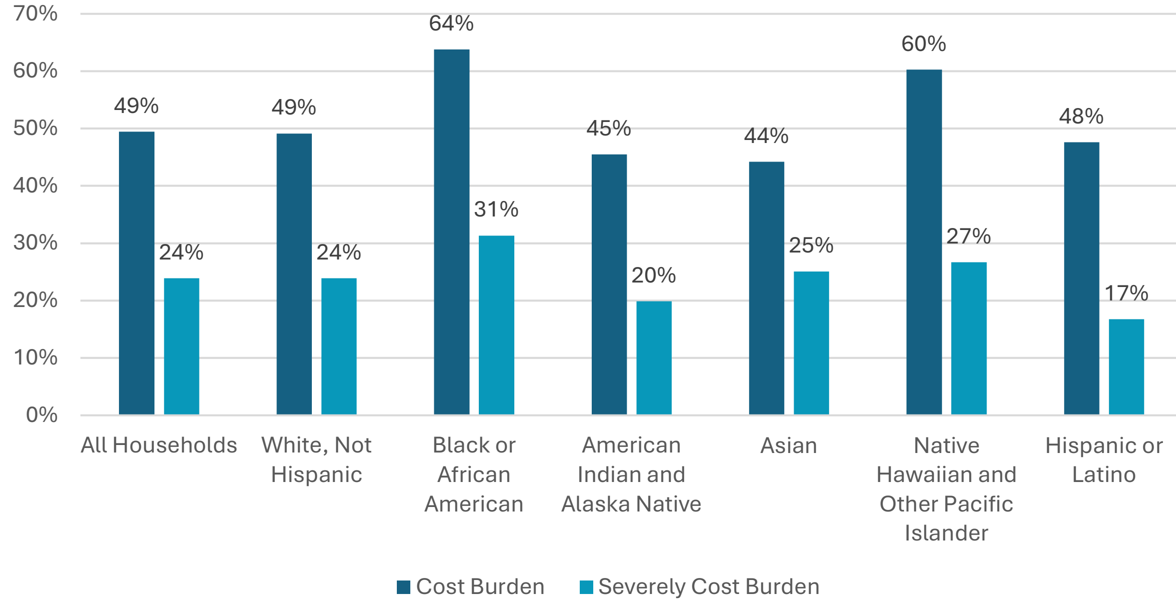


Source: City of Spokane; U.S. Census Bureau, U.S. Department of Commerce. American Community Survey, 2023: 5-Year Estimates, Table B25140

For renter-occupied households, over 60% of Black and Native Hawaiian and Other Pacific Islander renter households paid more than 30 percent of their income on housing costs, which is more than 10 percentage points higher than White alone, Non-Hispanic households. Black and NHOPI renter households also have the highest rates of severely cost burden. **See Figure 20.**

[40] Commerce, 2023a

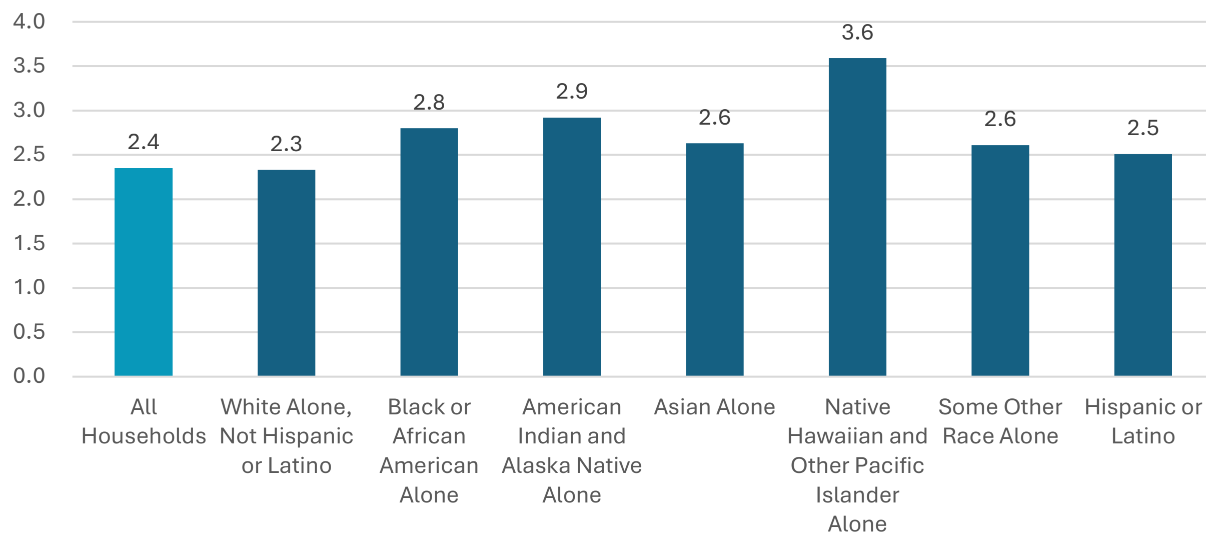
Figure 20. Renter Households with Housing Cost Burdens by Race/Ethnicity, 2023



Source: City of Spokane; U.S. Census Bureau, U.S. Department of Commerce. American Community Survey, 2023: 5-Year Estimates, Table B25140

Household type and size are important considerations when finding a place to live. **On average, BIPOC households are larger at 2.8 persons per household compared to 2.3 persons per household for White households, which is consistent with the indicator of higher percentages of cost burden.** The average household size for all households is 2.4, while NHOPI has the largest at 3.6 persons per household. **See Figure 21**

Figure 21. Household Size by Race/Ethnicity, 2023

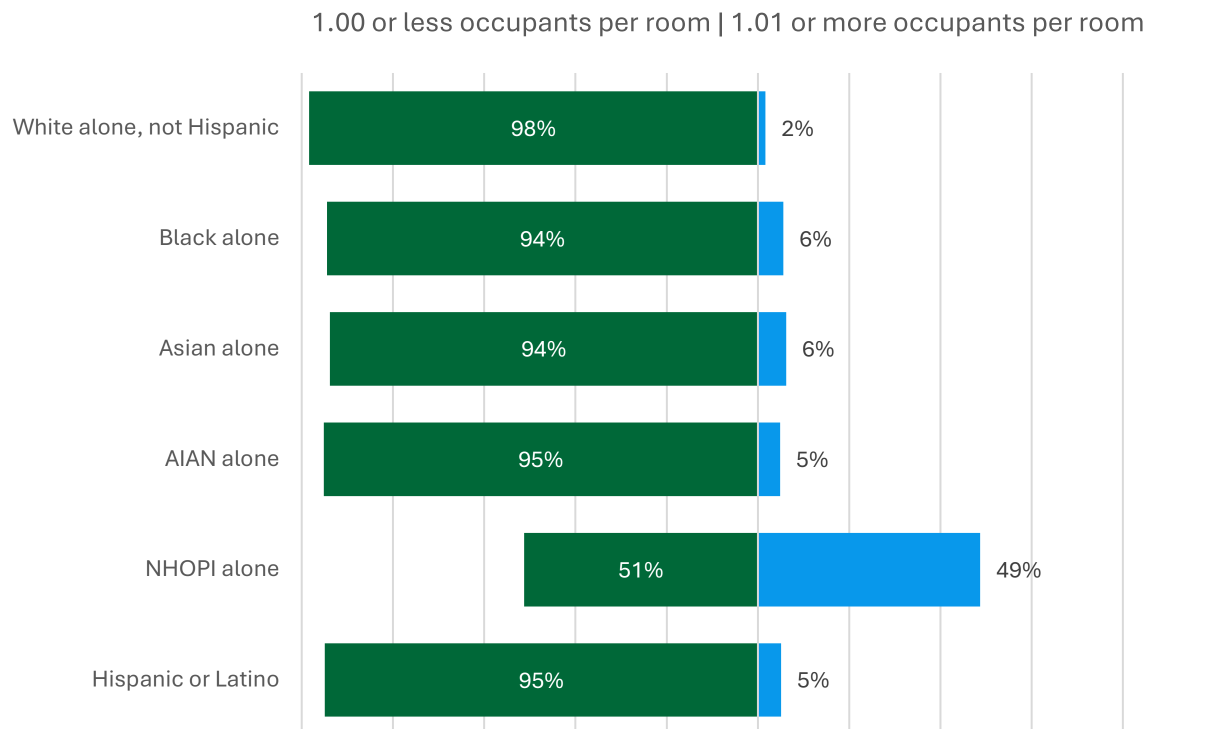


Source: City of Spokane; U.S. Census Bureau, Average Household Size of Occupied Housing Units by Tenure (2023). American Community Survey, ACS 5-Year Estimates Detailed Tables, Tables B25010A-H

Overcrowding, measured by more than one person per room in a dwelling unit, can be an indication that the available housing stock is too expensive relative the purchasing power of households or does not match household sizes.[41] When people are living in homes that are too small for their household needs and size, this can indicate that more appropriate housing options are inaccessible due to a range of factors such as cost or location. Overcrowding is associated with negative health impacts related to physical health, mental health, and personal safety. Reviewing overcrowding rates by race and ethnicity may indicate disparities in housing impacts.

Knowing communities that are experiencing overcrowding in Spokane can help inform mitigating strategies to prevent negative health impacts. In Spokane, **BIPOC households experienced overcrowding at a rate higher than White, not Hispanic households** in 2023. NHOPI households experiencing a significantly higher rate (49%) of overcrowding than all other races. This may be an indicator of housing affordability issues, as well as multi-generational living. See Figure 22

Figure 22. Occupants per Room by Race/Ethnicity, 2023



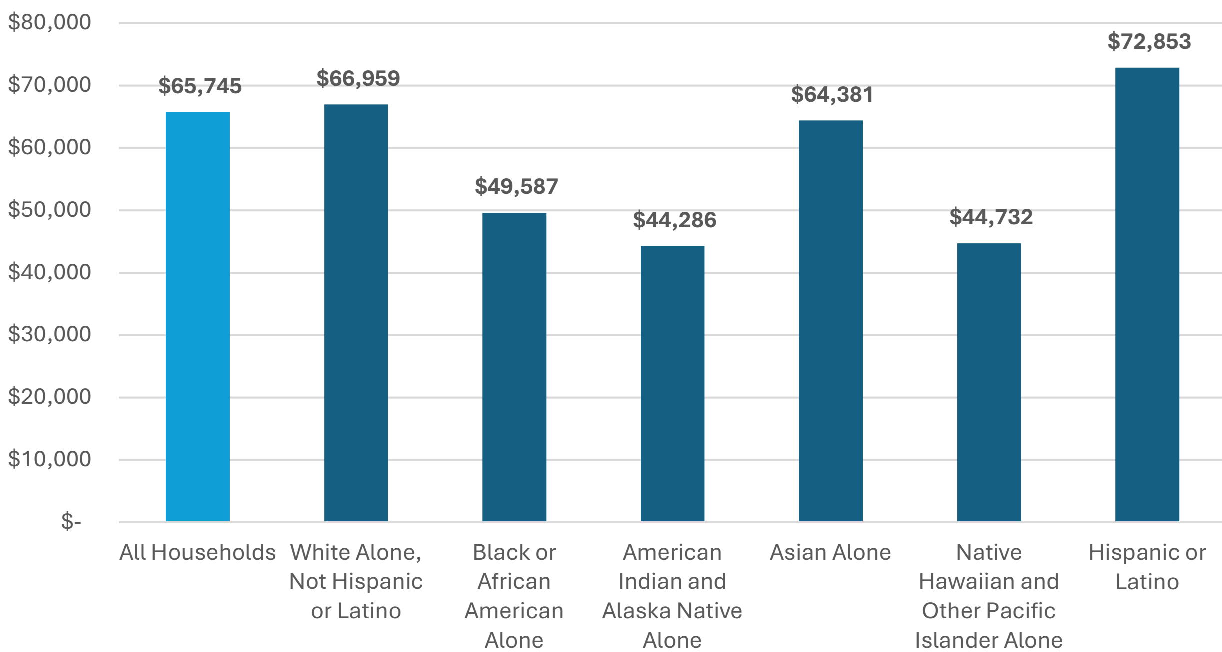
Source: City of Spokane; U.S. Census Bureau, U.S. Department of Commerce. (2023). American Community Survey 2023: 5-Year Estimates. Tables B25014A-I.

[41] Commerce, 2023a

3.4 Income and Housing Cost

The median household income in the city of Spokane in 2023 was $65,745, less than the median household income for Spokane County at $73,380. The median household income for White, Non-Hispanic households was higher than the city level at $66,959, while Hispanic or Latino households had the highest income at $72,853. **The median household income was nearly a third less for Black or African American, American Indian and Alaska Native, and Native Hawaiian and Other Pacific Islander households.** See Figure 23

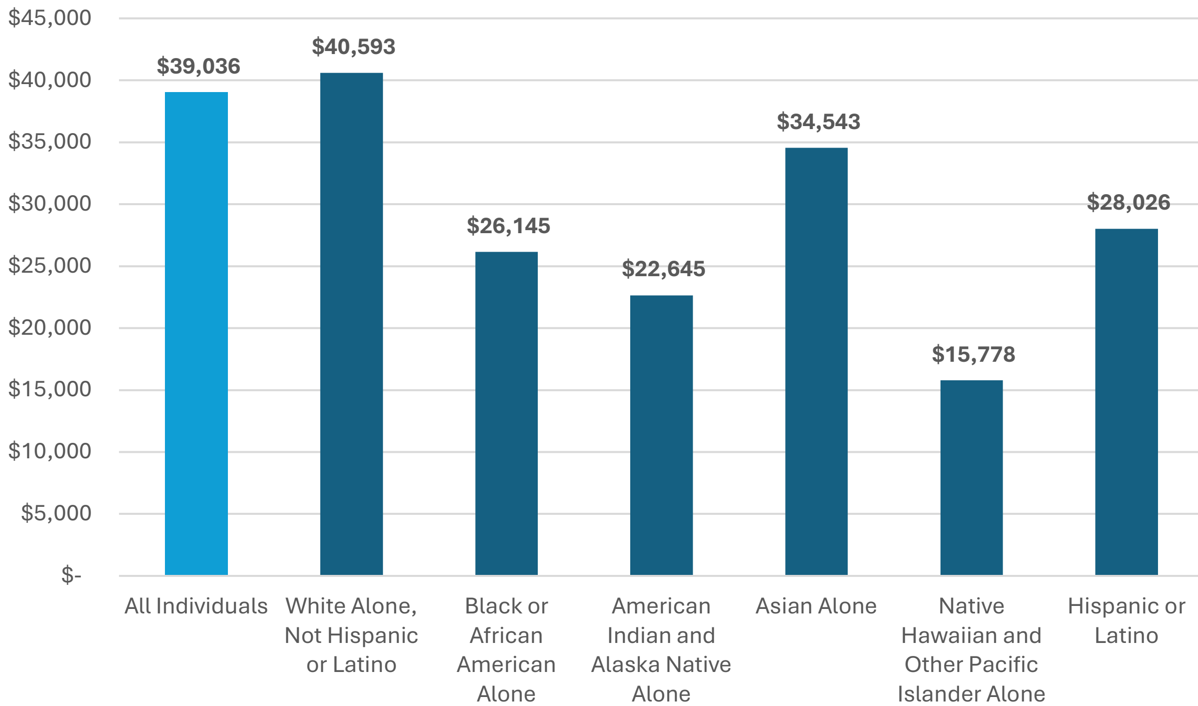
Figure 23. Median Household Income in Past 12 Months, 2023



Source: City of Spokane; U.S. Census Bureau, U.S. Department of Commerce. (2023). Median Household Income in the Past 12 Months (in 2023 Inflation-Adjusted Dollars). American Community Survey, ACS 5-Year Estimates Detailed Tables, Tables B19013A-I

While housing is experienced at a household scale, larger household sizes for households of color, whether cultural or economically driven, play into household income. When income and race are compared at the individual level, rather than household level, disparities become more apparent. **The median individual income in 2023 for all households was $39,036.** See Figure 24

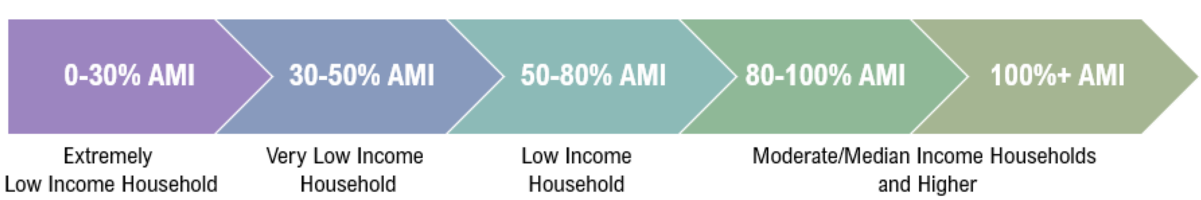
Figure 24. Median Individual Income in Past 12 Months, 2023



Source: City of Spokane; U.S. Census Bureau, Per Capita Income in the Past 12 Months (in 2023 Inflation-Adjusted Dollars). American Community Survey, ACS 5-Year Estimates Detailed Tables, Tables B19301A-H. Note: This figure represents the income of individuals over the age of 15 who earned $1 or more in the past year.

When examining household income levels, the Area Median Income (AMI) is a helpful benchmark for understanding what different households can afford to pay for housing expenses. Since housing needs vary by family size and costs vary by region, the Department of Housing and Urban Development (HUD) produces a median income benchmark for different family sizes and regions on an annual basis. These benchmarks help determine eligibility for HUD housing programs and support the tracking of different housing needs for a range of household incomes.

Area Median Income

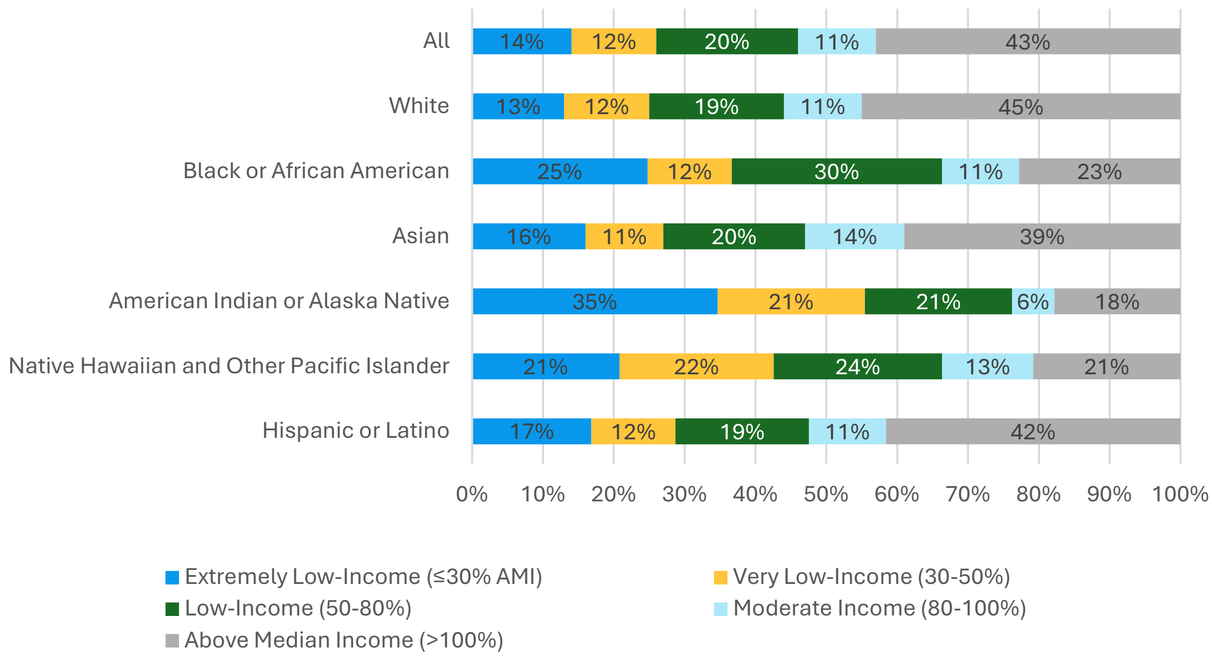


Source: Spokane Housing Action Plan, 2021

With 45% of households making greater than 100% AMI, the community with the highest percentage of households earning above the area median income is White households, followed by Hispanic or Latino households with 43% of households making more than median income. **A higher distribution of households of color earn less than 80% of the City's AMI, compared to White households.** See

Figure 25. Over 60% of Black and NHOPI households earn less than 80% AMI. American Indian and Alaska Native households earn less, with over three quarters of households earning less than 80% AMI and a third making less than 30% AMI (extremely low-income).

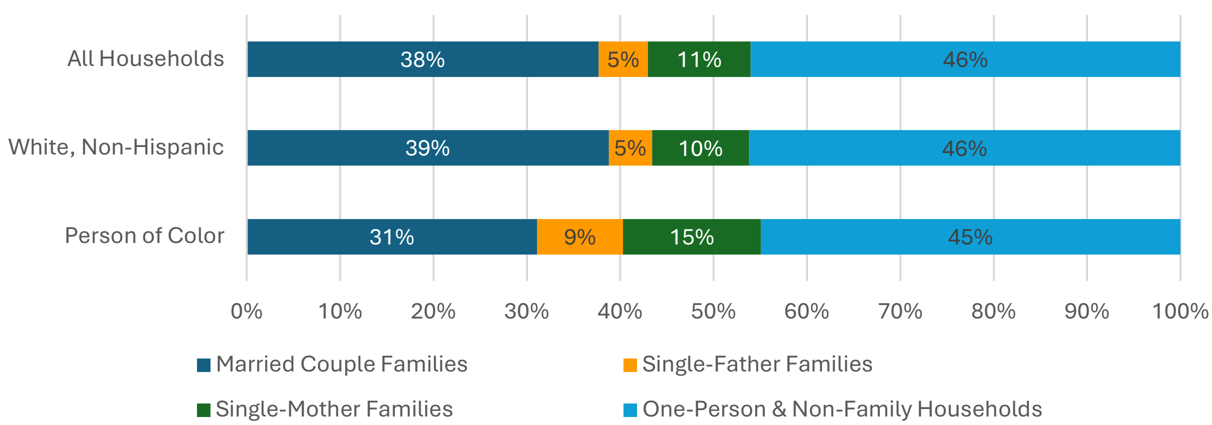
Figure 25. Distribution of Households by AMI and Race/Ethnicity, 2021



Source: City of Spokane; US HUD, 2017-2021 Comprehensive Housing Affordability Strategy (CHAS) (Table 1)

When looking at the composition of households by race, there is almost an equal percentage of White Non-Hispanic households and BIPOC households that consist of families. **Nearly a quarter of BIPOC households are a single-parent family**, compared to 15% of White, Non-Hispanic households. See Figure 26

Figure 26. Household Type by Race/Ethnicity of Householder, 2023



Source: City of Spokane; U.S. Census Bureau, Average Household Size of Occupied Housing Units by Tenure (2023). American Community Survey, ACS 5-Year Estimates Detailed Tables, Tables B11001A-I

3.5 Access to Fair Housing

The Fair Housing Act of 1968 protects people seeking homes from discrimination based on race, color, national origin, religion, sex, familial status and disability. The Fair Housing Act requires that recipients of federal housing and urban development funds take meaningful action to address housing disparities caused by both public and private actions. This includes undoing segregated living patterns, transforming racially and ethnic concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.

The City of Spokane adopted the 2024-2027 Fair Housing Plan, developed by the Northwest Fair Housing Alliance which works to is to eliminate housing discrimination and to ensure equal housing opportunity for the people of Washington State through education, counseling and advocacy. The Fair Housing Plan outlines extensive data and reporting on fair housing impediments, as well as providing feedback from community members and recommendations for policy changes.[42]

The Fair Housing Plan outlined the following complaint data for Spokane, which was obtained from HUD and the Washington State Human Rights Commission. Between July 2019 and March 2024, at least 62 complaints filed with HUD and/or the WSHRC originated in Spokane. **See Table 4**

Table 4. Fair Housing Complaints, 2019-2024

Complaint	Percent of complaints
Disability-based housing discrimination	71% (33 complaints) • 11 complaints as disability with one or more secondary protected classes (race, sex, familial status, retaliation)
Familial Status	12%
Sex and Sexual Orientation & Gender Identity	11%
Race complaints	5%
National Origin complaints	3%
Marital Status	1.6%

The 2024 Fair Housing Plan provides more details on fair housing issues, contributing factors, and protected class groups adversely impacted.

[42] City of Spokane. (2024a). *Spokane Fair Housing Plan*. https://static.spokanecity.org/documents/chhs/plans-reports/planning/2024-draft-fair-housing-plan.pdf

4. Disparities in Access and Wellbeing

Where people can live is a determination of several factors related to quality of life and wellbeing such as access to services, education, environmental health outcomes, and life expectancy. It is important to recognize where in the city different populations can access housing and how that adversely impacts their lives. Examining these downstream effects of housing location and choice can help identify policies that may cause a racially disparate impact.

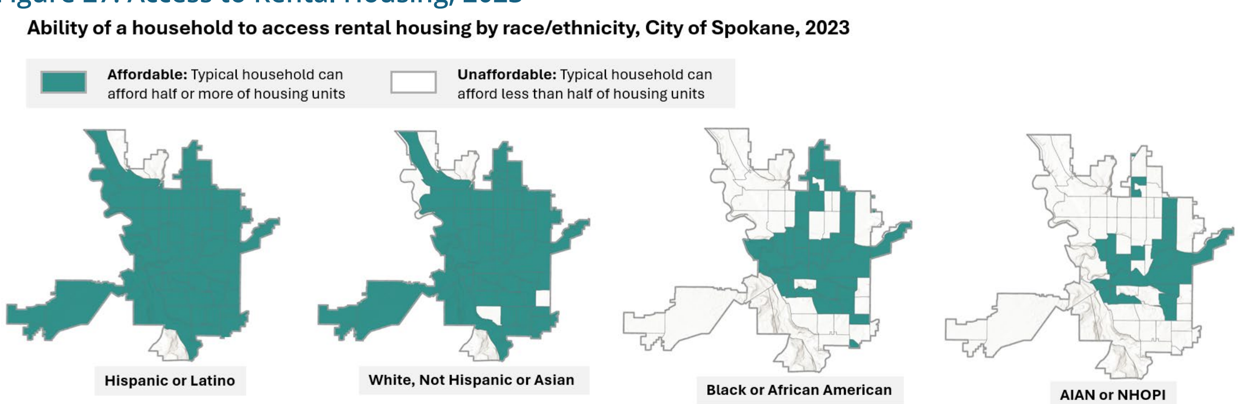
4.1 Neighborhood Access

Neighborhood access is defined by the WA Department of Commerce as the ability of a household to access housing in a specific neighborhood.[43] Neighborhood access can be assessed by comparing household incomes to housing costs. Analyzing the areas of the city accessible by racial groups based on patterns of household income can help to identify areas of the city that are functionally inaccessible to different racial groups and reflect on how that accessibility has changed over time. Comparing the outcome of this analysis across racial groups can demonstrate whether land use policies are in effect creating a racially disparate impact or are exclusionary.

Access to Rental Housing

The analysis evaluated the areas in which the typical household can afford half or more of housing units (affordable) to areas in which they can afford less than half of housing units (unaffordable). In 2023, Hispanic or Latino, White Non-Hispanic, and Asian households had the broadest ability to access rental housing across Spokane based on household income and housing costs. **The ability of Black, American Indian and Alaska Native, and Native Hawaiian and Other Pacific Islander households to access rental housing was considerably more limited, with access generally limited to Central and Northeast Spokane.** See Figure 27

Figure 27. Access to Rental Housing, 2023



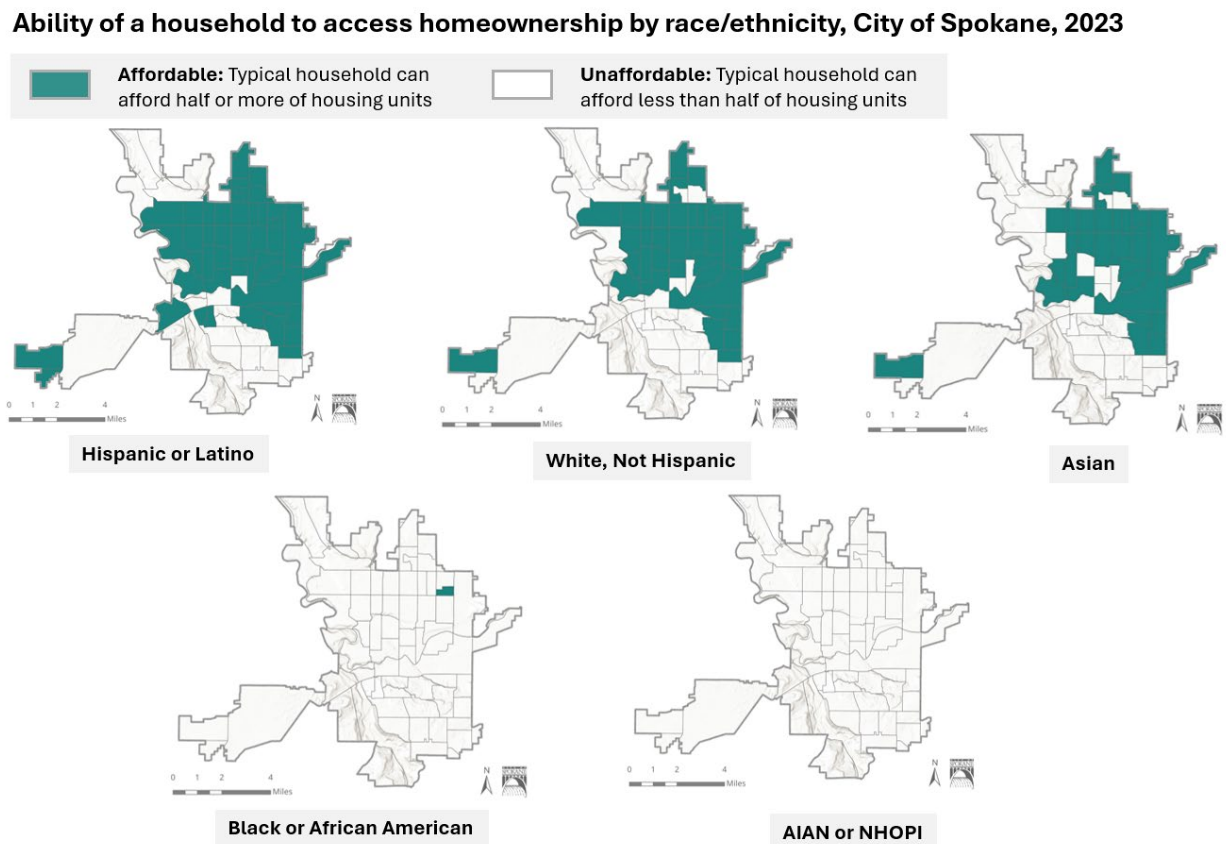
Source: City of Spokane; U.S. Census Bureau, U.S. Department of Commerce. American Community Survey, ACS 5-Year Estimates, 2023. Median Household Income in the Past 12 Months, Table B19013. Selected Housing Characteristics, Table DP04.

[43] Commerce, 2023a

Access to Homeownership

Similar to rental housing, Hispanic or Latino, White Non-Hispanic, and Asian households have the broadest ability to access homeownership across Spokane based on household income and housing costs, though it is more limited than access to rental housing. In comparison, **the ability of Black or African American, American Indian and Alaska Native, and Native Hawaiian and Other Pacific Islander households to access homeownership based on household income and housing costs is severely limited across large portions of the city.** South Spokane had the least accessibility for homeownership of all races, but no area south of I-90 was affordable for a typical Black, American Indian and Alaska Native, and Native Hawaiian and Other Pacific Islander household. See Figure 28

Figure 28. Access to Homeownership, 2023

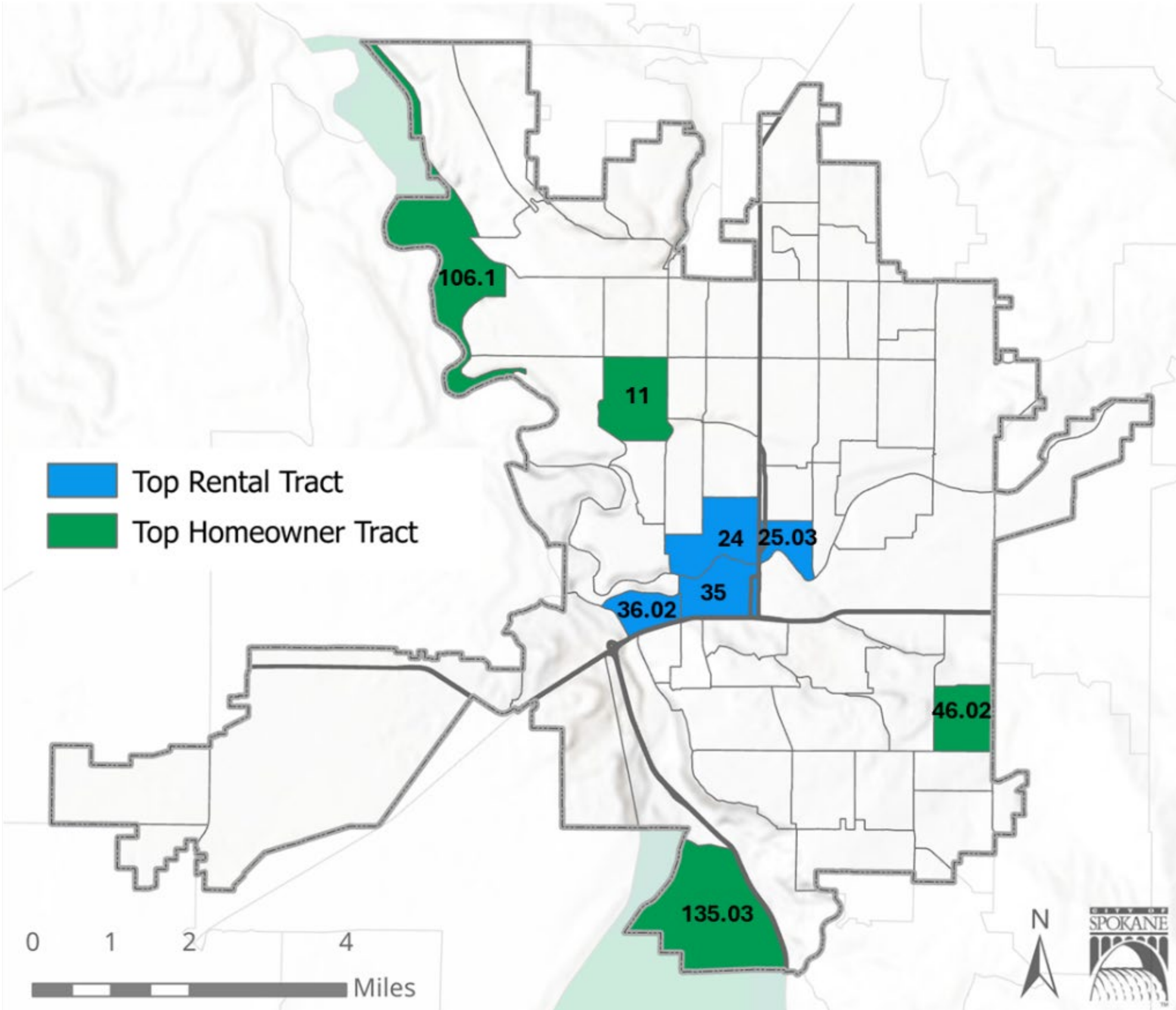


Source: City of Spokane; U.S. Census Bureau, U.S. Department of Commerce. American Community Survey, ACS 5-Year Estimates, 2023. Median Household Income in the Past 12 Months, Table B19013. Selected Housing Characteristics, Table DP04.

Rental and Homeownership Rates by Census Tract

Looking at the highest concentrations of households renting and owning by Census Tracts, the Census Tracts with the highest percentage of renters are in Central Spokane, in portions of the Browne's Addition, Riverside, Emerson/Garfield, West Central, and Logan neighborhoods, while the Census Tracts with the highest homeownership rates are on the South Hill and in Northwest Spokane, specifically the Northwest, Audubon-Downriver, Lincoln Heights, and Latah/Hangman neighborhoods. Census Tract 25.03, which covers Gonzaga University, has the highest rental rate in the city and reflects the large student population. See Figure 29

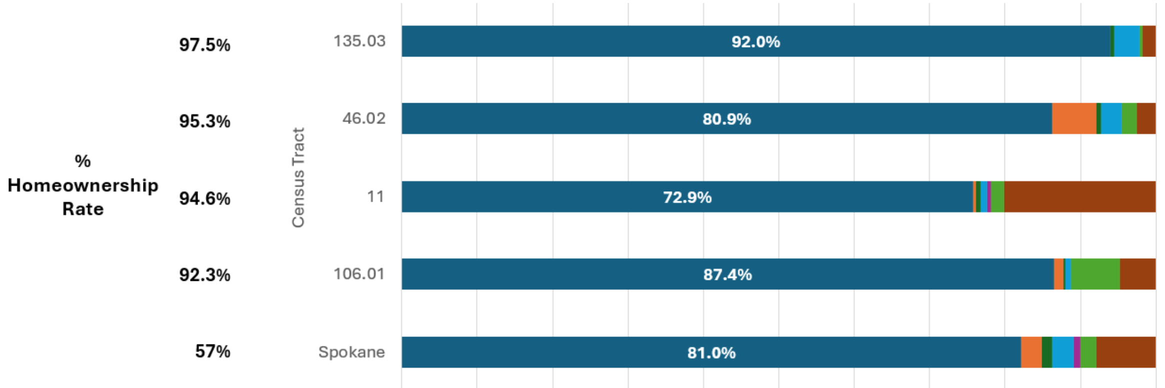
Figure 29. Highest Homeownership/Rental Census Tracts, 2021



Source: City of Spokane; US HUD, 2017-2021 Comprehensive Housing Affordability Strategy (CHAS)(Table 1)

Looking at the demographics of the Census Tracts with the highest rental and homeownership rates, there is a racial disparity in the representation of households. **For the Census Tracts with the highest homeownership rates, 3 of 4 census tracts have a higher percentage of White population than citywide.** Some Census Tracts also had higher rates of BIPOC populations, suggesting a concentration of racial groups for homeownership. These percentages, however, are still lower than the percentage of White population in the census tracts. **Native Hawaiian and Other Pacific Islander and American Indian and Alaska Native households are underrepresented in all the highest homeownership Census Tracts.** Census Tract 11, in Audubon/Downriver, had the most diversity in homeownership in both racial groups and household incomes. See Figure 30

Figure 30. Demographics of Highest Homeownership Census Tracts, 2023

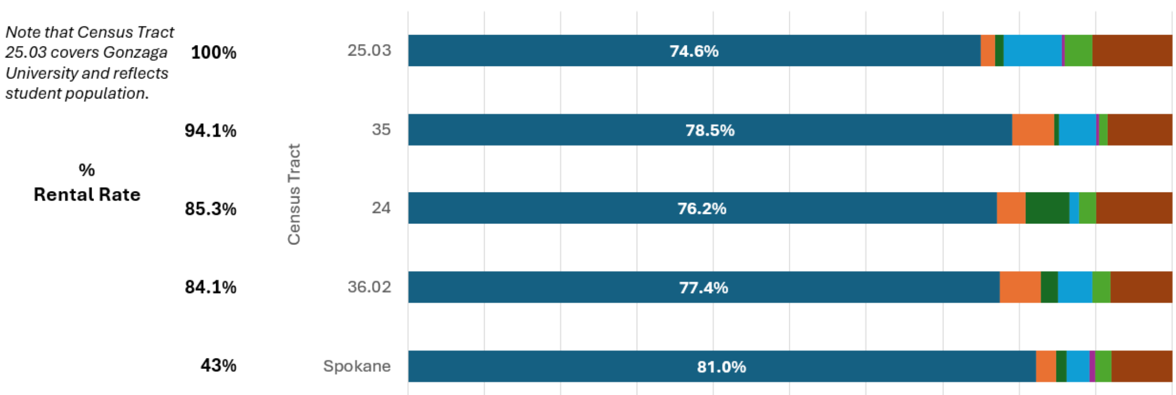


		Census Tracts			
	Spokane	106.01	11	46.02	135.03
White	81.0%	87.4%	72.9%	80.9%	92.0%
Black or African American	2.7%	1.3%	0.4%	5.5%	0.0%
American Indian and Alaska Native	1.3%	0.2%	0.5%	0.6%	0.5%
Asian	2.9%	0.8%	0.9%	2.6%	3.3%
Native Hawaiian and Other Pacific Islander	0.8%	0.0%	0.5%	0.0%	0.0%
Some Other Race	2.1%	6.6%	1.6%	1.8%	0.3%
Hispanic or Latino (of any race)	7.8%	4.8%	19.4%	2.4%	1.8%

Source: City of Spokane; U.S. Census Bureau, U.S. Department of Commerce. American Community Survey, 2023: 5-Year Estimates, Table DP05

All of the Census Tracts with the highest rental rates have a lower percentage of White population than the city level. **These Census Tracts all had at least two BIPOC racial groups overrepresented compared to the city level.** American Indian and Alaska Native households were overrepresented in half of the highest rental Census Tracts. See Figure 31

Figure 31. Demographics of Highest Rental Census Tracts, 2023

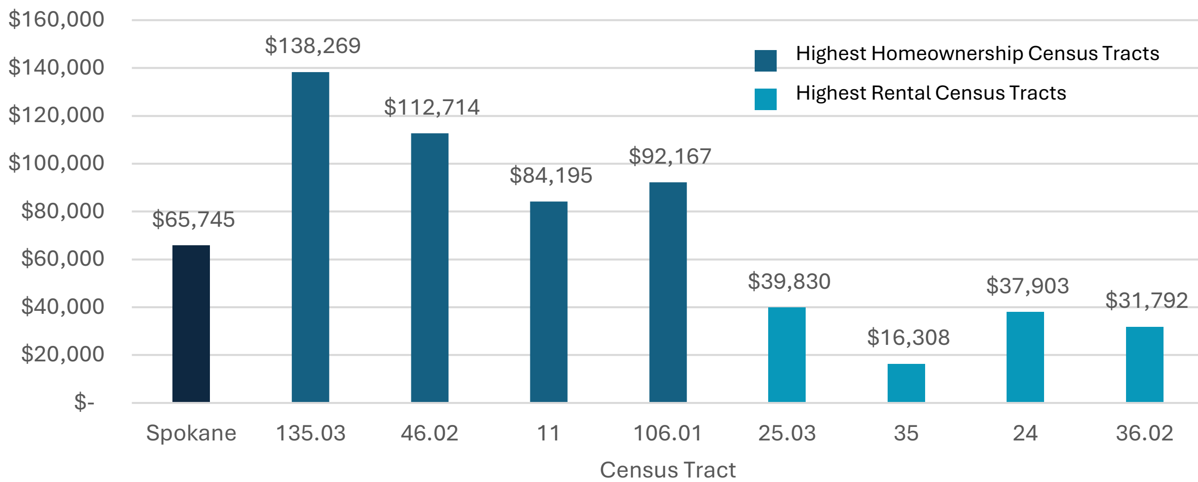


		Census Tracts			
	Spokane	36.02	24	35	25.03
White	81.0%	77.4%	76.2%	78.5%	74.6%
Black or African American	2.7%	5.3%	3.7%	5.4%	1.9%
American Indian and Alaska Native	1.3%	2.3%	5.7%	0.6%	1.1%
Asian	2.9%	4.5%	1.3%	4.9%	7.6%
Native Hawaiian and Other Pacific Islander	0.8%	0.0%	0.0%	0.3%	0.3%
Some Other Race	2.1%	2.4%	2.2%	1.1%	3.6%
Hispanic or Latino (of any race)	7.8%	8.0%	9.8%	8.4%	10.4%

Source: City of Spokane; U.S. Census Bureau, U.S. Department of Commerce. American Community Survey, 2023: 5-Year Estimates, Table DP05

All highest homeownership Census tracts had higher median household incomes than the city, and all highest rental tracts had lower median household incomes than the city overall. **The range between the highest majority homeowner household income and the lowest majority renter household income was $121,961, meaning the median household income of Census Tract 135.03 was eight times greater than that of Census Tract 35.** See Figure 32

Figure 32. Median Household Incomes of Highest Homeownership & Rental Census Tracts, 2023



Source: City of Spokane; U.S. Census Bureau, U.S. Department of Commerce. American Community Survey, 2023: 5-Year Estimates, Table DP03

4.2 Educational Access

The quality of access to education can be impacted by where families can access housing. Assessment of educational access by race includes racial representativeness of children in higher performing schools compared to lower performing schools and locations of higher performing schools relative to racial composition of the surrounding neighborhood.[44]

Kindergarten Readiness

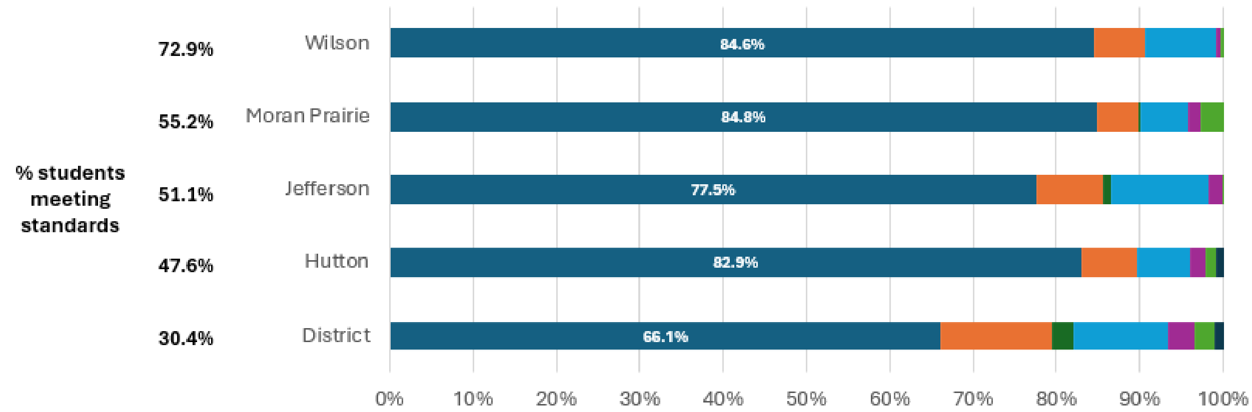
To document kindergarten readiness, six areas of development are assessed by the Washington State Office of the Superintendent of Instruction: social-emotional, physical, cognitive, language, literacy, and mathematics. Children who demonstrate readiness in all six areas have a greater likelihood of success in kindergarten and beyond. These assessments largely reflect a student's experiences and learning before entering public school (rather than school performance).

District wide demographics for Spokane Public Schools (SPS) provide a reference point. **The top kindergarten readiness schools in SPS have higher percentage of White students compared to the district overall. Hispanic, Black, American Indian and Alaska Native, and Native Hawaiian and Other Pacific Islander students are majority under-represented in the top schools compared to the district overall.** Two schools had higher representation of Asian and Hispanic/Latino students than the district overall. **See Figure 33.** Comparatively, the lowest

[44] Commerce, 2023a

kindergarten readiness schools had a lower percentage of White students compared to the district overall. BIPOC students match the district demographics or are over-represented compared to the district overall. See Figure 34

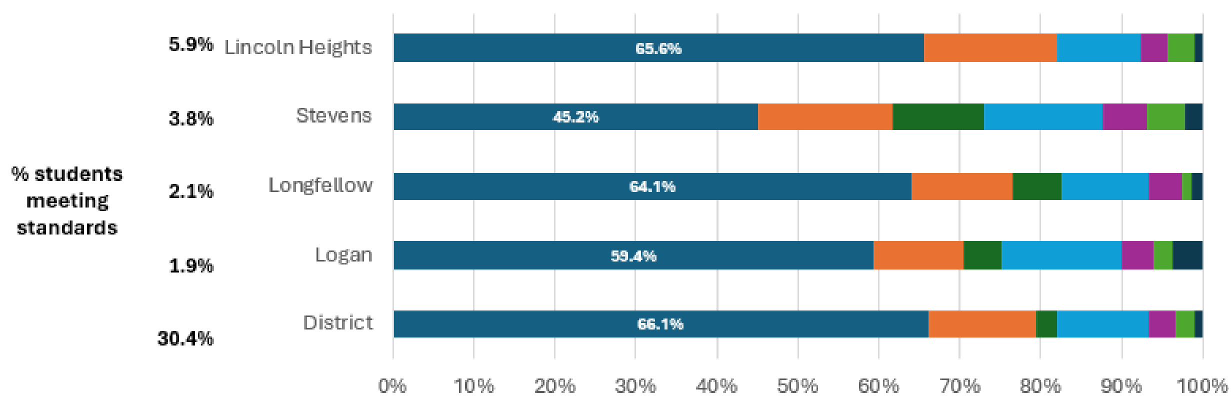
Figure 33. Demographics of Top Four Kindergarten Readiness Schools, Spokane Public Schools, 2022-2023



	District	Hutton	Jefferson	Moran Prairie	Wilson
White	66.1%	82.9%	77.5%	84.8%	84.6%
Two or More Races	13.3%	6.8%	8.1%	5.0%	6.1%
Native Hawaiian and Other Pacific Islander	2.6%	0.0%	0.9%	0.2%	0.0%
Hispanic/Latino of any race	11.4%	6.2%	11.7%	5.8%	8.5%
Black/African American	3.2%	1.9%	1.6%	1.5%	0.6%
Asian	2.3%	1.3%	0.2%	2.7%	0.3%
American Indian and Alaska Native	1.1%	0.9%	0%	0%	0%

Source: City of Spokane; Washington OSPI. Report Card Kindergarten Readiness 2022-23 School Year. https://data.wa.gov/education/Report-Card-WaKids-2022-23-School-Year/3ji8-ykgj/about_data

Figure 34. Demographics of Lowest Four Kindergarten Readiness Schools, Spokane Public Schools, 2022-2023



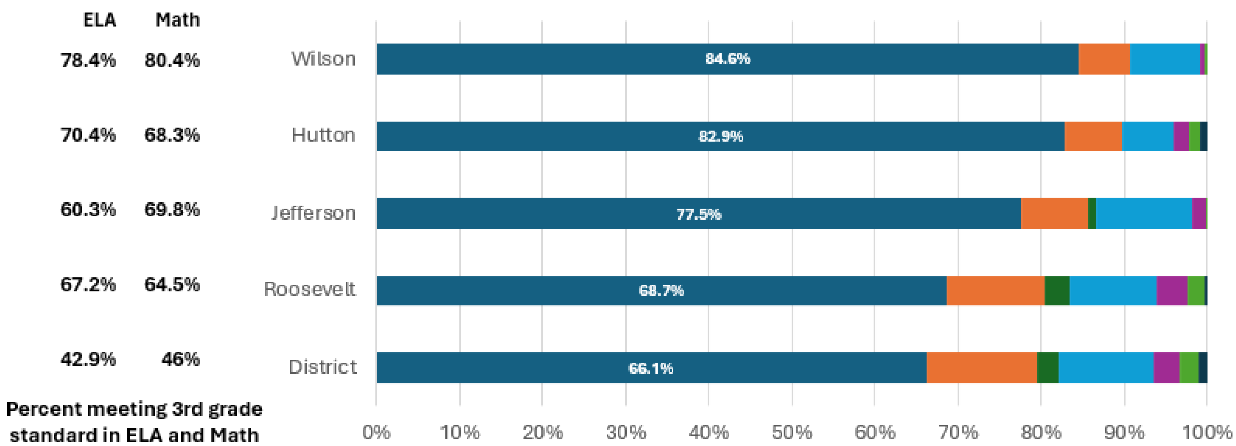
	District	Logan	Longfellow	Stevens	Lincoln Heights
White	66.1%	59.4%	64.1%	45.2%	65.6%
Two or More Races	13.3%	11.1%	12.4%	16.6%	16.4%
Native Hawaiian and Other Pacific Islander	2.6%	4.7%	6.0%	11.2%	0.0%
Hispanic/Latino of any race	11.4%	14.8%	10.8%	14.8%	10.4%
Black/African American	3.2%	4.0%	4.1%	5.5%	3.3%
Asian	2.3%	2.3%	1.2%	4.7%	3.3%
American Indian and Alaska Native	1.1%	3.7%	1.4%	2.1%	1.0%

Source: City of Spokane; Washington OSPI. Report Card Kindergarten Readiness 2022-23 School Year. https://data.wa.gov/education/Report-Card-WaKids-2022-23-School-Year/3ji8-ykgj/about_data

Third Grade ELA and Mathematics Assessments

SPS offers assessments at 3rd grade in English Language Arts (ELA) and Mathematics, which helps to reflect school performance and resources available to the students while at school, as well as in homes and neighborhoods. **At the top performing elementary schools by 3rd Grade Assessment, White students are overrepresented compared to the district overall, while BIPOC students are majority underrepresented at these schools**, particularly American Indian and Alaska Native and Native Hawaiian and Other Pacific Islander students. See Figure 35. At the lowest performing four elementary schools, BIPOC students match the demographic rates of the district or are over-represented. White students are below the district level for all the lowest performing schools. See Figure 36

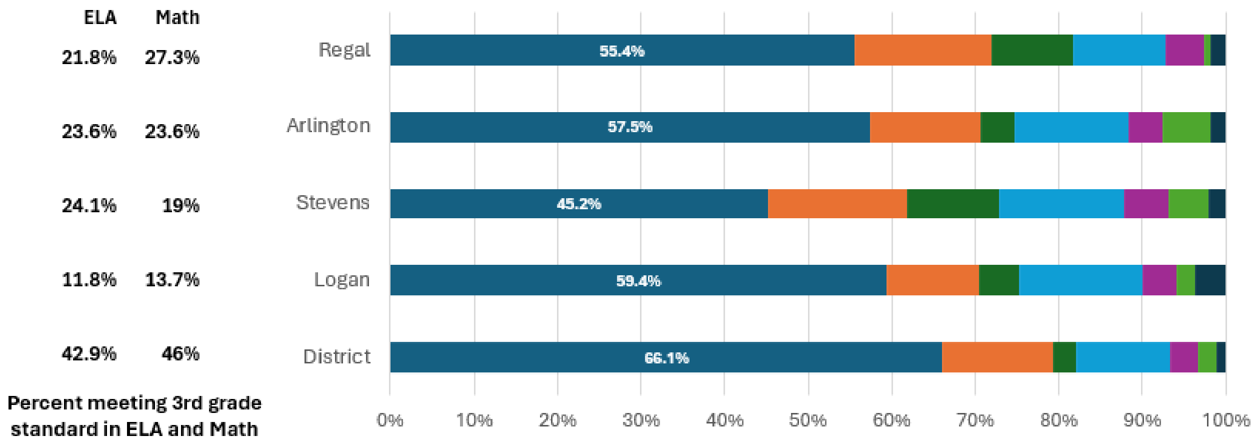
Figure 35. Demographics of Top Four Elementary Schools by 3rd Grade Assessment, Spokane Public Schools, 2022-2023



	District	Roosevelt	Jefferson	Hutton	Wilson
White	66.1%	68.7%	77.5%	82.9%	84.6%
Two or More Races	13.3%	11.7%	8.1%	6.8%	6.1%
Native Hawaiian and Other Pacific Islander	2.6%	3.0%	0.9%	0.0%	0.0%
Hispanic/Latino of any race	11.4%	10.5%	11.7%	6.2%	8.5%
Black/African American	3.2%	3.8%	1.6%	1.9%	0.6%
Asian	2.3%	2.0%	0.2%	1.3%	0.3%
American Indian and Alaska Native	1.1%	0.4%	0%	0.9%	0%

Source: City of Spokane; Washington OSPI. Report Card Assessment Data 2022-23 School Year. https://data.wa.gov/education/Report-Card-Assessment-Data-2022-23-School-Year/xh7m-utwp/about_data

Figure 36. Demographics of Lowest Four Elementary Schools by 3rd Grade Assessment, Spokane Public Schools, 2022-2023



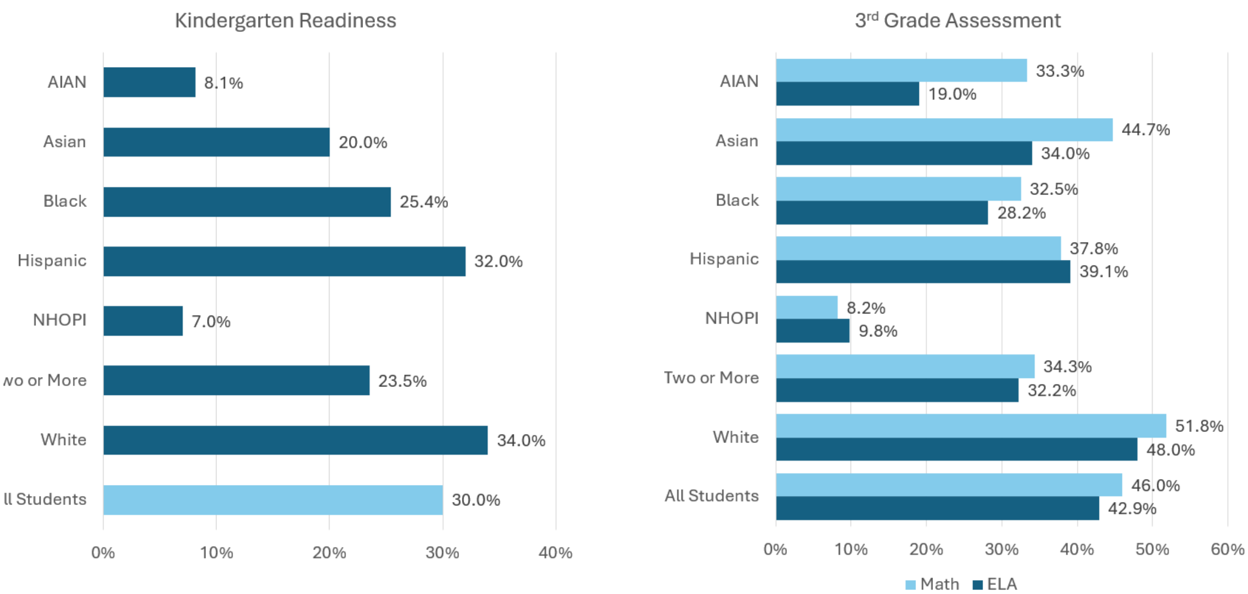
	District	Logan	Stevens	Arlington	Regal
White	66.1%	59.4%	45.2%	57.5%	55.4%
Two or More Races	13.3%	11.1%	16.6%	13.3%	16.4%
Native Hawaiian and Other Pacific Islander	2.6%	4.7%	11.2%	4.0%	9.8%
Hispanic/Latino of any race	11.4%	14.8%	14.8%	13.8%	11.1%
Black/African American	3.2%	4.0%	5.5%	4.0%	4.5%
Asian	2.3%	2.3%	4.7%	5.8%	0.8%
American Indian and Alaska Native	1.1%	3.7%	2.1%	1.8%	1.9%

Source: City of Spokane; Washington OSPI. Report Card Assessment Data 2022-23 School Year. https://data.wa.gov/education/Report-Card-Assessment-Data-2022-23-School-Year/xh7m-utwp/about_data

Districtwide Assessments

District wide readiness rates for Native Hawaiian and Other Pacific Islander, American Indian and Alaska Native, Asian, Black, and multiracial students in Spokane Public Schools were below the district overall, and below Hispanic and White students. For the 3rd grade assessment rates, all students of color were below the district overall and below White students in ELA. Rates for math were lower for all students of color other than Asian students, which was higher than the district but still lower than White students. Disparities in achieving grade-level standards are seen particularly in NHOPI students, who increased the least in meeting standards from Kindergarten to 3rd grade. **See Figure 37**

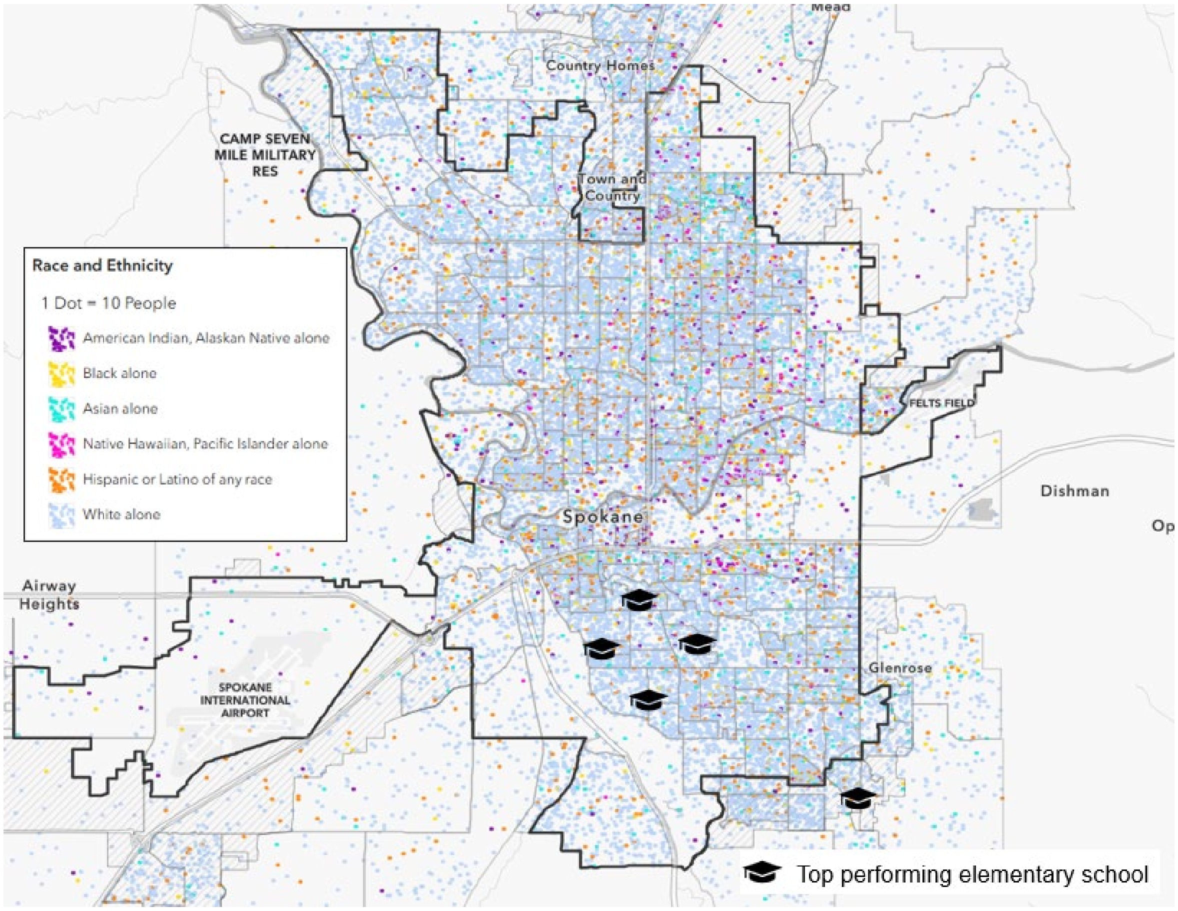
Figure 37. Demographics of Student Assessments, Spokane Public Schools, 2022-2023



Sources: City of Spokane; Washington OSPI. Report Card Kindergarten Readiness 2022-23 School Year. https://data.wa.gov/education/Report-Card-WaKids-2022-23-School-Year/3ji8-ykgj/about_data. Washington OSPI. Report Card Assessment Data 2022-23 School Year. https://data.wa.gov/education/Report-Card-Assessment-Data-2022-23-School-Year/xh7m-utwp/about_data

When considering the disparities in educational access, all top 5 elementary schools are located south of I-90 on the South Hill. While the school boundaries cover larger areas compared to census tracts, **there is a disparity in access to quality education for populations living north of I-90, compared to those living south of I-90.** The racial distribution map shows a higher concentration of White population in south Spokane, with non-White populations more concentrated in Central and Northeast Spokane. **See Figure 38**

Figure 38. Location of Higher Performing Schools Relative to Racial Composition



Source: City of Spokane; Spokane Climate Vulnerability Index; Washington OSPI, 2022-2023

4.3 Park Access

Spokane Parks produced the Spokane Parks and Natural Lands Master Plan in 2021 to guide the Parks and Recreation Department's focus and direction over the next ten years.[45] Outlined in the Parks Master Plan, parks are distributed throughout the city to provide 89% of households a publicly available park within a comfortable walking distance. Although serving the smallest number of households, City Council District 2 (South Spokane) has approximately 1,000 more park acres than District 1 (Northeast Spokane) and 900 more acres than District 3 (Northwest Spokane). District 2 holds the most individual parks – 43 park properties compared to 28 in both District 1 and 2. District 2 also holds nine distinct natural lands properties compared to one in District 1 and four in District 3, meaning that residents in this district are afforded more access to recreation in a natural setting. District 1 has the least amount of park acreage, resulting in more competition and use of park amenities. **See Table 5**

[45] City of Spokane. Spokane Parks and Recreation Department (Spokane Parks). (2021). *Spokane Parks and Natural Lands Master Plan.* https://my.spokanecity.org/parksrec/master-plan/

Table 5. Spokane Parks and Households per City Council District

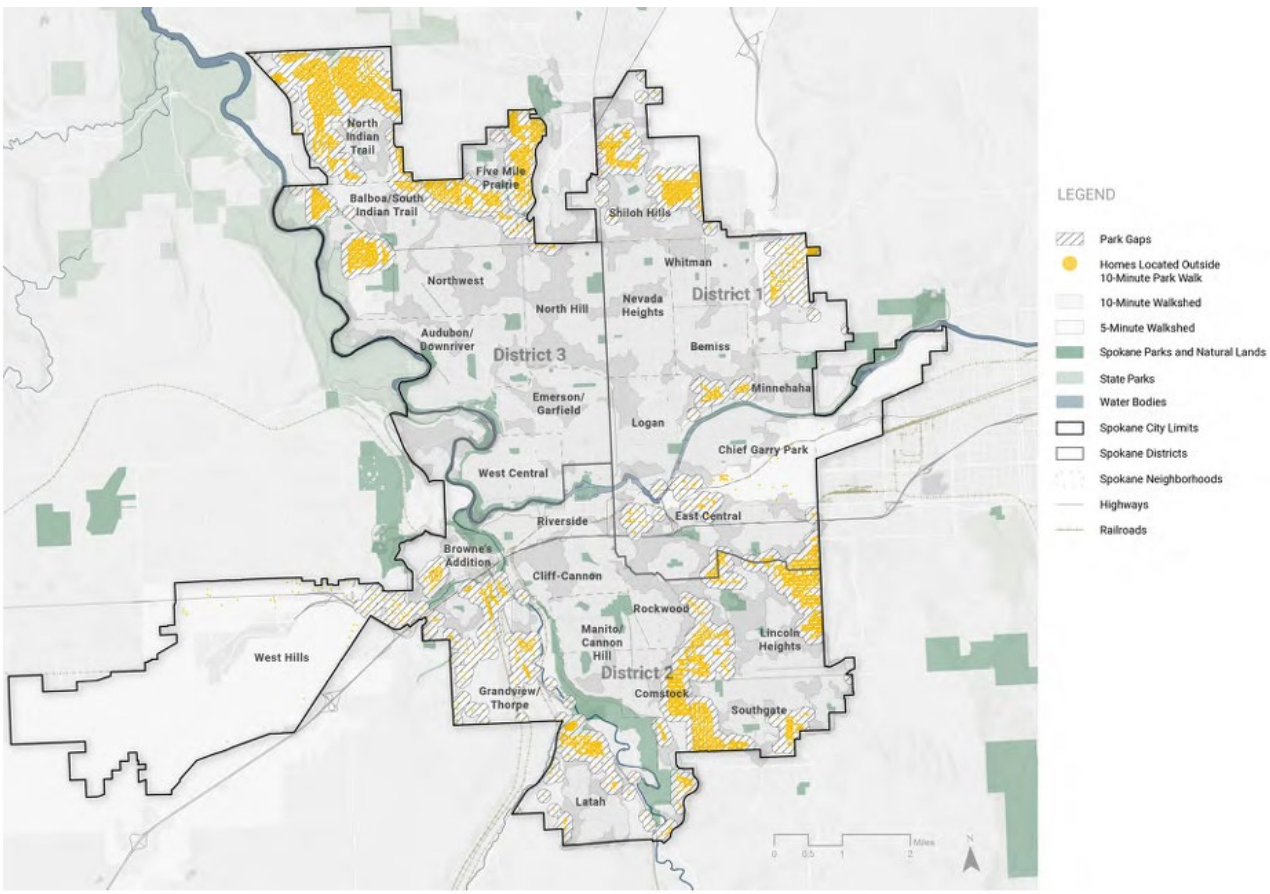
DISTRICT	HOUSEHOLDS	PARK ACRES	PARK PROPERTIES	PARK ACRES PER HOUSEHOLD
District 1	32,267	458	28	0.014
District 2	29,380	1,681	43	0.057
District 3	33,466	748	28	0.02
Total	95,113	3,863	105	0.04

Source: City of Spokane GIS data 2021

Source: Spokane Parks Master Plan, 2021

The Parks Master Plan outlines that larger amenities like neighborhood and regional parks are not distributed equally, and are more closely connected to higher income and homeownership areas. **See Figure 39.** This suggest that not just the presence of amenities like parks is important, but the quality and investment of the amenities could contribute to overall outcomes when considering amenities and infrastructure.

Figure 39. Spokane Parks Walkshed Park Gaps



Source: Design Workshop Analysis 2021, City of Spokane GIS data 2021, Spokane County GIS Data

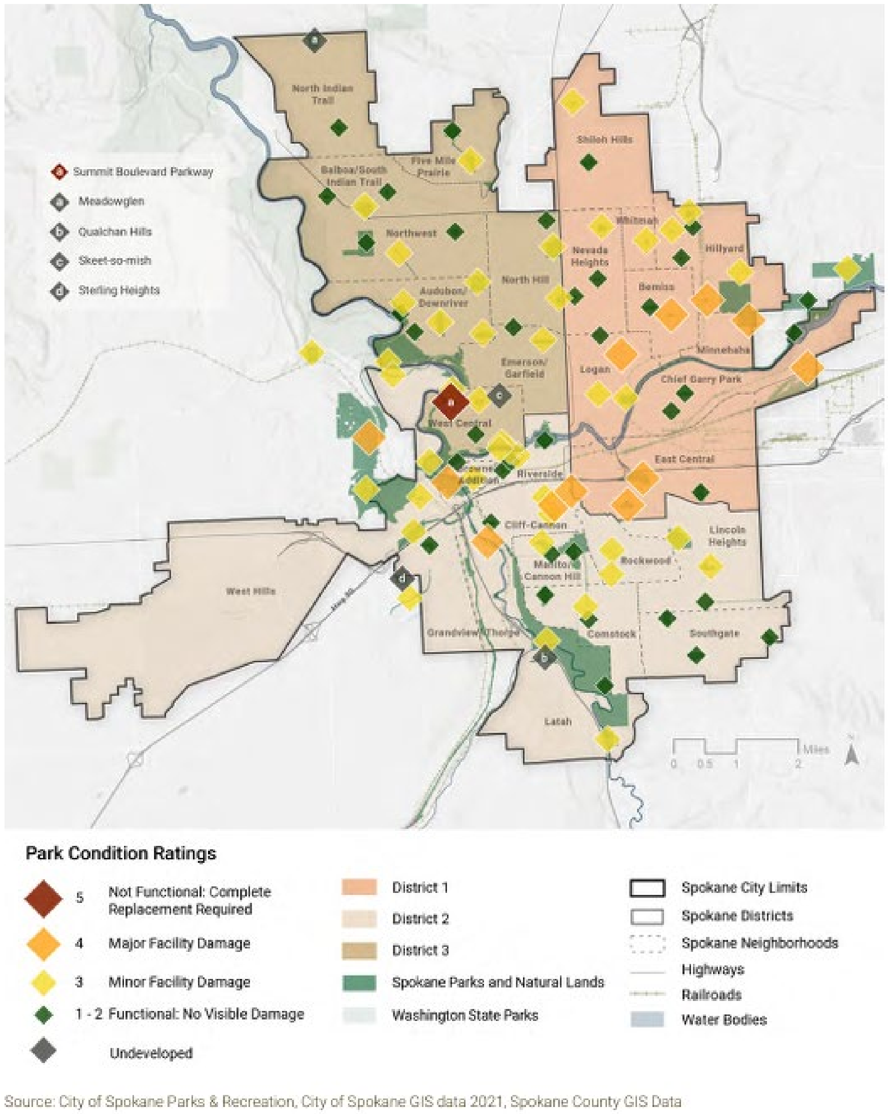
Source: Spokane Parks Master Plan, 2021

The following outlines the percentage of households outside 10-minute walk access to a City-owned park:[46]

- **District 1** has 15% of its households without a park within walking distance (equates to 4,720 households). They have a larger percentage of households with parks within walking distance of their homes, but the smallest total acreage of parks. According to public feedback, the quality of some of these parks is less desirable and that they are used less. This indicates that walkshed is not the only measure of park need. The majority of parks with major facility damage are in District 1. **See Figure 40**
- **District 2** has 18% of its households without a park within walking distance (equates to 7,403 households). Many of their parks are larger natural areas or larger acreage parks. The large number of households without park access indicates a need for better connections between park spaces and to residential areas of the district, particularly in the Lincoln Heights and Southgate neighborhoods. District 2 has more park acres per household than both Districts 1 and 3 combined.
- **District 3** has 14% of the district's households are without a park within a 10-minute walk of their home (equates to 4,232 households). District 3 parks appear to be in the best overall shape when compared to other districts. Investments on City-owned property within the northwest portion of the district will improve park access for residents in this quickly growing part of the city.

[46] Spokane Parks, 2021

Figure 40. Spokane Parks Condition Ratings

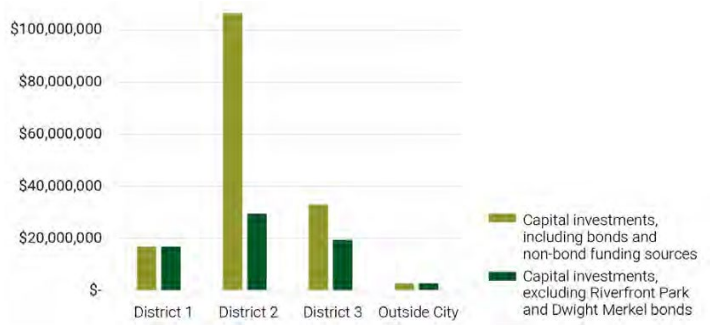


Source: Spokane Parks Master Plan, 2021

When looking at the distribution of spending across Spokane's three council districts, there is a disparity in various parts of the city.[47] Park investments made in District 2 are more than six times that of District 1 and three times greater than District 2 over a 22-year period; however, this also includes major investment in Riverfront Park. To account for this, shown in dark green are capital investments per district with the exclusion of Riverfront Park and Dwight Merkel Sports Complex. This data depicts greater spending in District 2 between 1999 and 2021, with less spending in Districts 1 and 3. When excluding bond initiatives, capital investment spending data by council district between 2017 and 2021 illuminates that investments made in District 2 have still exceeded that of Districts 1 and 3 by 200 percent or more than $4 million. See Figure 41

[47] Spokane Parks, 2021

Figure 41. Capital Investments by Council District, 1999-2021



Source: City of Spokane. History of Park Investments, 1999-2021

4.4 Environmental Health Disparities

Where residents can access housing also determines what pollution and other environmental hazards they are exposed to. The Washington State Department of Health (DOH) compiles information on environmental health and hazard risk information for each census tract in Washington state in the Environmental Health Disparities Map.[48] The dataset identifies which areas are most impacted by environmental pollution and can help determine where more attention needs to be placed in order to address and reduce the specific pollution, societal, and health harms affecting people.

Environmental health disparities are defined as the increasing combination of factors (social, medical, climate, and environmental) that create inequities in health, which cause more sickness, disease, pollution, and other problems to Washington communities with more economic need, specifically providing data on exposure to:

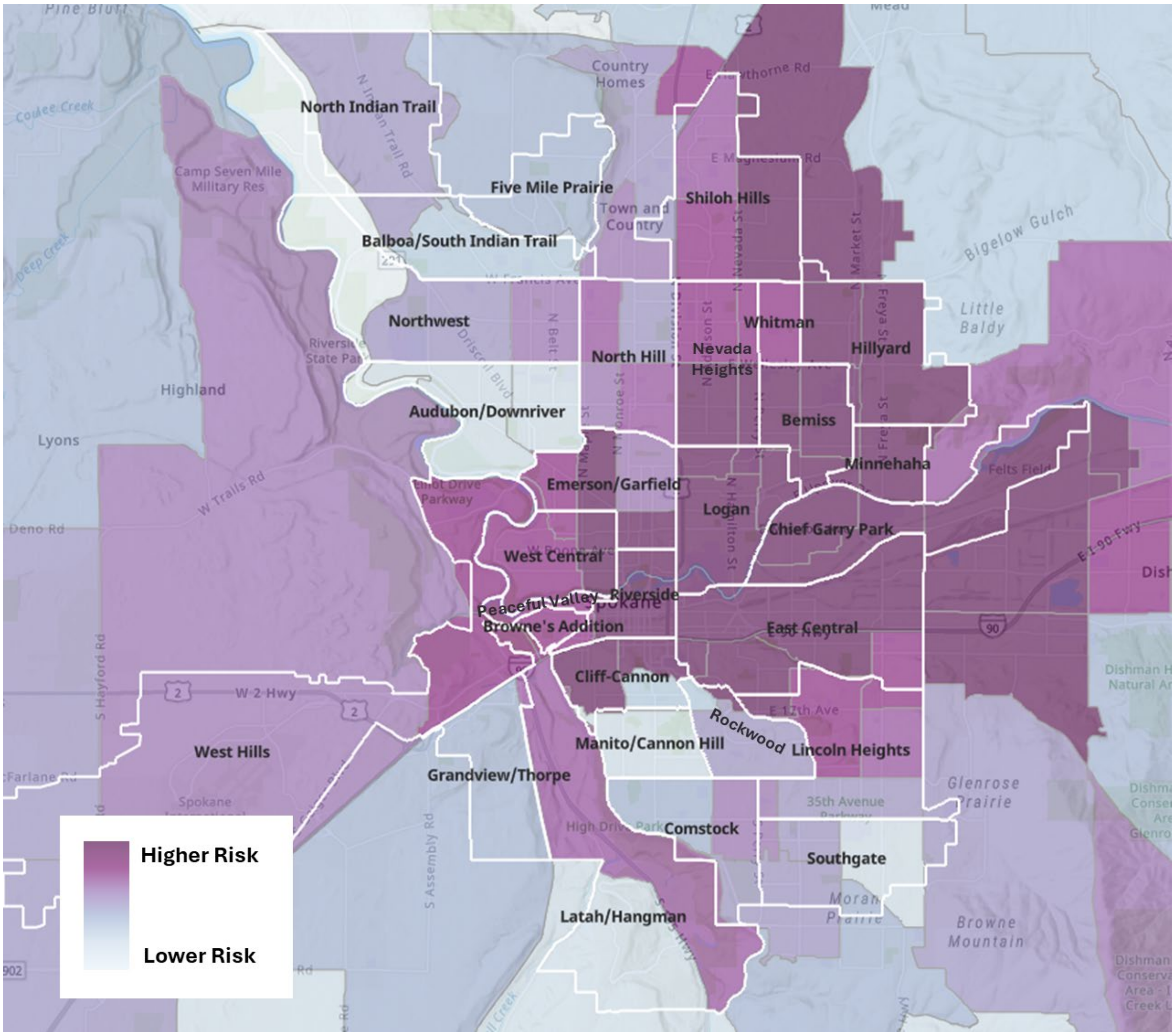
- Diesel exhaust PM2.5 emissions
- Ozone Concentration
- Particulate matter (PM2.5)
- Toxic releases from facilities
- Proximity to heavy traffic roadways

Almost one-third of Spokane's population (32.7%) live in an area that is considered extremely environmentally overburdened, ranking 10 out of 10 on the Washington State DOH map comparing environmental health disparities across the state.[49] The highest-ranking census tracts for exposure to environmental harms are along the I-90 corridor, particularly East Central, and Northeast Spokane, as well as the lower South Hill. According to DOH, Spokane has higher rates of death from cardiovascular disease and lower birth weights than much of the state, especially in central

[48] Washington State Department of Health. (2022). Environmental Health Disparities Map – Version 2.0. https://doh.wa.gov/data-and-statistical-reports/washington-tracking-network-wtn/washington-environmental-health-disparities-map
[49] City of Spokane. (2024). *Spokane Climate Impacts and Climate Justice Memo.* https://static.spokanecity.org/documents/planspokane/climate-planning/spokane-climate-impacts-and-climate-justice-memo-2025-03-07.pdf

neighborhoods in the city, like downtown (Riverside), West Central, and East Central.[50] Other areas in the northwest and towards the edge of Spokane experience much lower environmental health risks. **See Figure 42**

Figure 42. Environmental Health Disparities



Source: WA DOH, Environmental Health Disparities Map

Vulnerability to environmental harms is represented by indicators of socioeconomic factors and sensitive populations for which there is clear evidence that they may affect susceptibility or vulnerability to an increased pollution burden.[51] Indicators in socioeconomic factors measure population characteristics that modify the pollution burden itself, including:

- No high school diploma;

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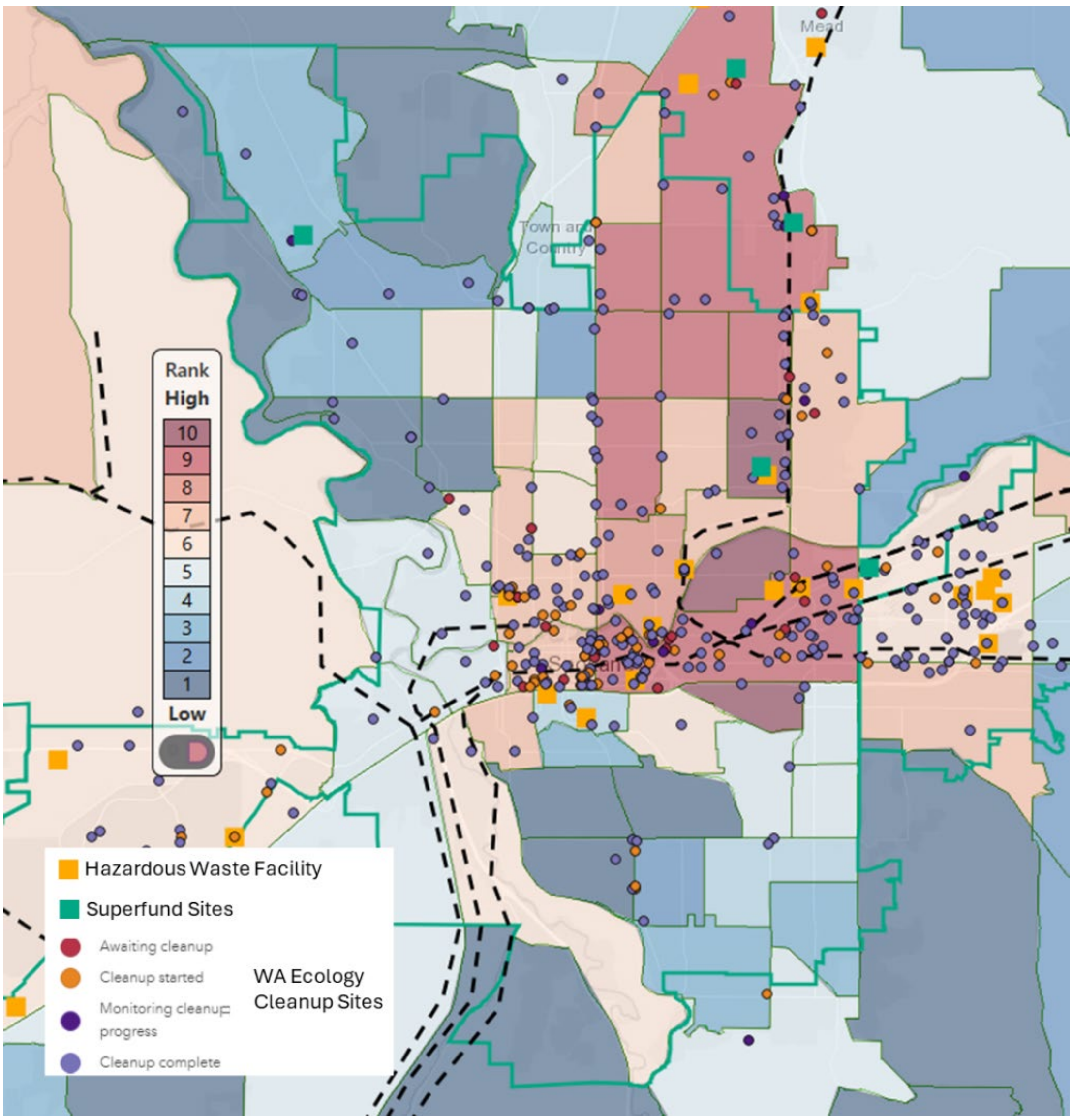
[50] City of Spokane, 2024b. *Spokane Climate Impacts and Climate Justice Memo.*
[51] WA DOH, 2022

- People of color (race/ethnicity);
- Population living in poverty;
- Primary language other than English;
- Transportation expense;
- Cost-burdened; and
- Unemployment.

Residents in Spokane who are more vulnerable to hazards and pollution based on socioeconomic factors are more likely to be exposed to hazardous facilities and pollution from transportation corridors including railroads and highways like I-90 and US 395. This is primarily concentrated in neighborhoods in Central and Northeast Spokane. See Figure 43

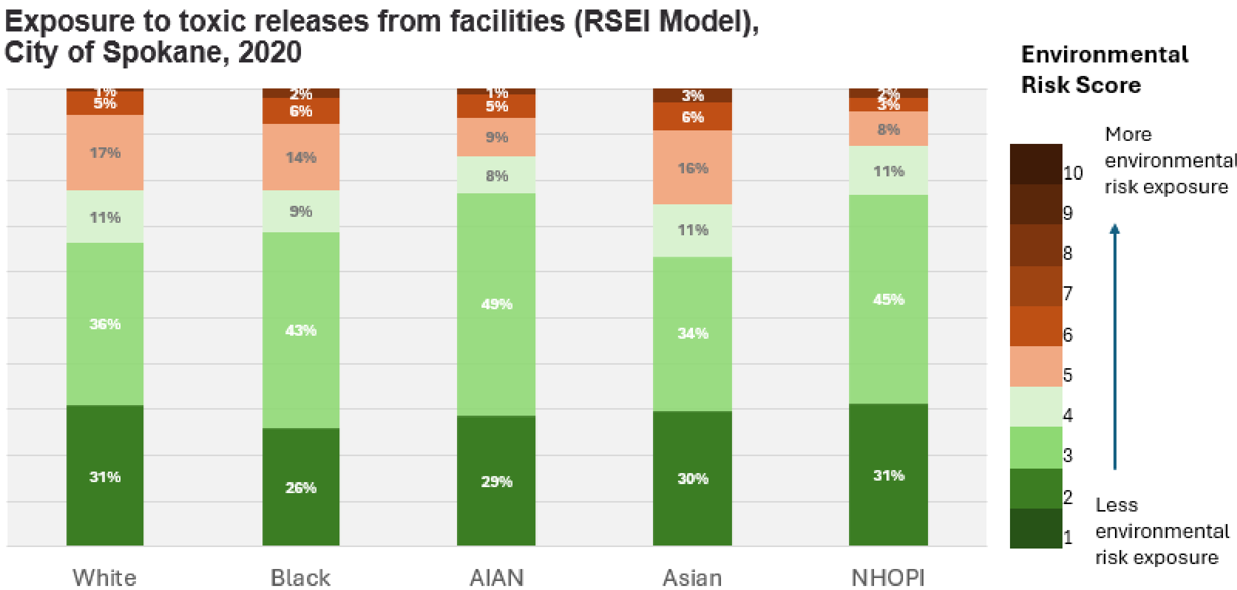
Figure 43. Socioeconomic Factors and Hazardous Facility Locations



Source: WA DOH, Environmental Health Disparities Map

Toxic releases from facilities referrs to chemicals emitted into the air from industrial facilities. These hazardous pollutants, including hazardous waste and emissions, are monitored by the EPA in their Toxic Release Inventory and measured for each census tract. **In the city of Spokane in 2020, Asian households had a higher proportion of people living with more severe exposure to toxic releases from facilities compared to other racial groups.** See Figure 44

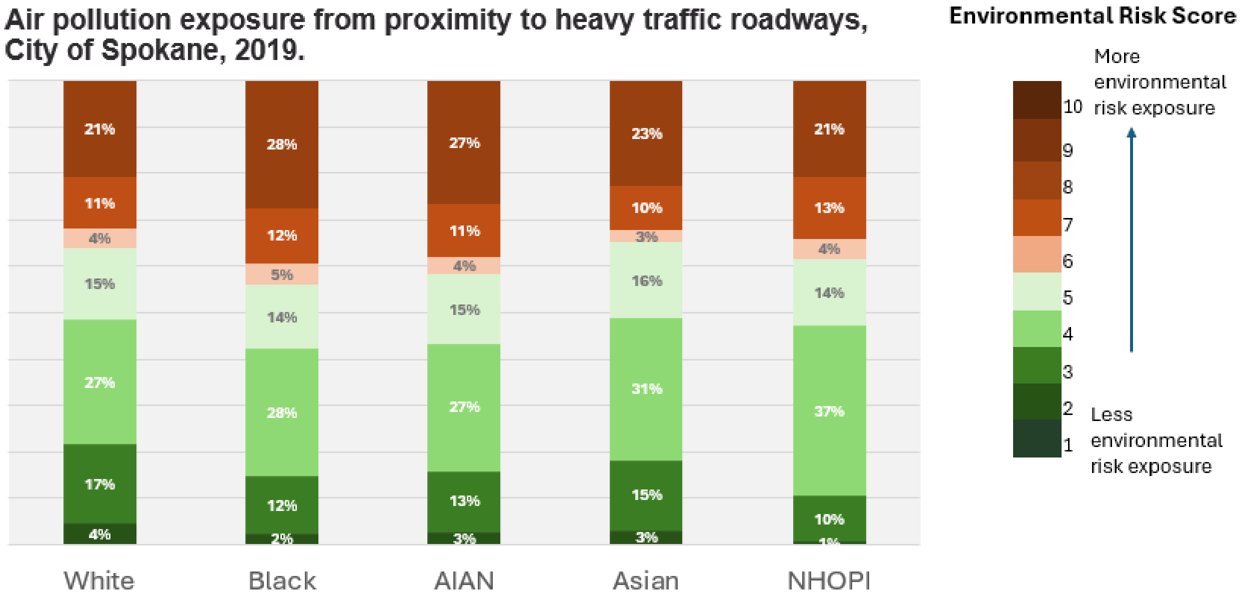
Figure 44. Exposure to Toxic Releases from Facilities, 2020



Source: City of Spokane; US EPA EJ Screen 2021, based on Risk Screening Environmental Indicator (RSEI) 2018-2020 3-year average

Exposure to high levels of pollution affects residents' health. Traffic volume and density greatly impact health conditions and are associated with cardiovascular diseases and cancers. This data was based on traffic along Washington highways and collected for each census tract. The chart below presents the exposure to air pollutants from roadways for each racial group based on where those populations live. **Black, American Indian and Alaska Native, and Native Hawaiian and Other Pacific Islander households have a higher proportion of people living with more severe exposure to traffic air pollution compared to White and Asian households.** See Figure 45

Figure 45. Air Pollution Exposure, 2019



Source: City of Spokane; Washington Tracking Network, Washington State Department of Health, 2019 roadway traffic data from WSDOT

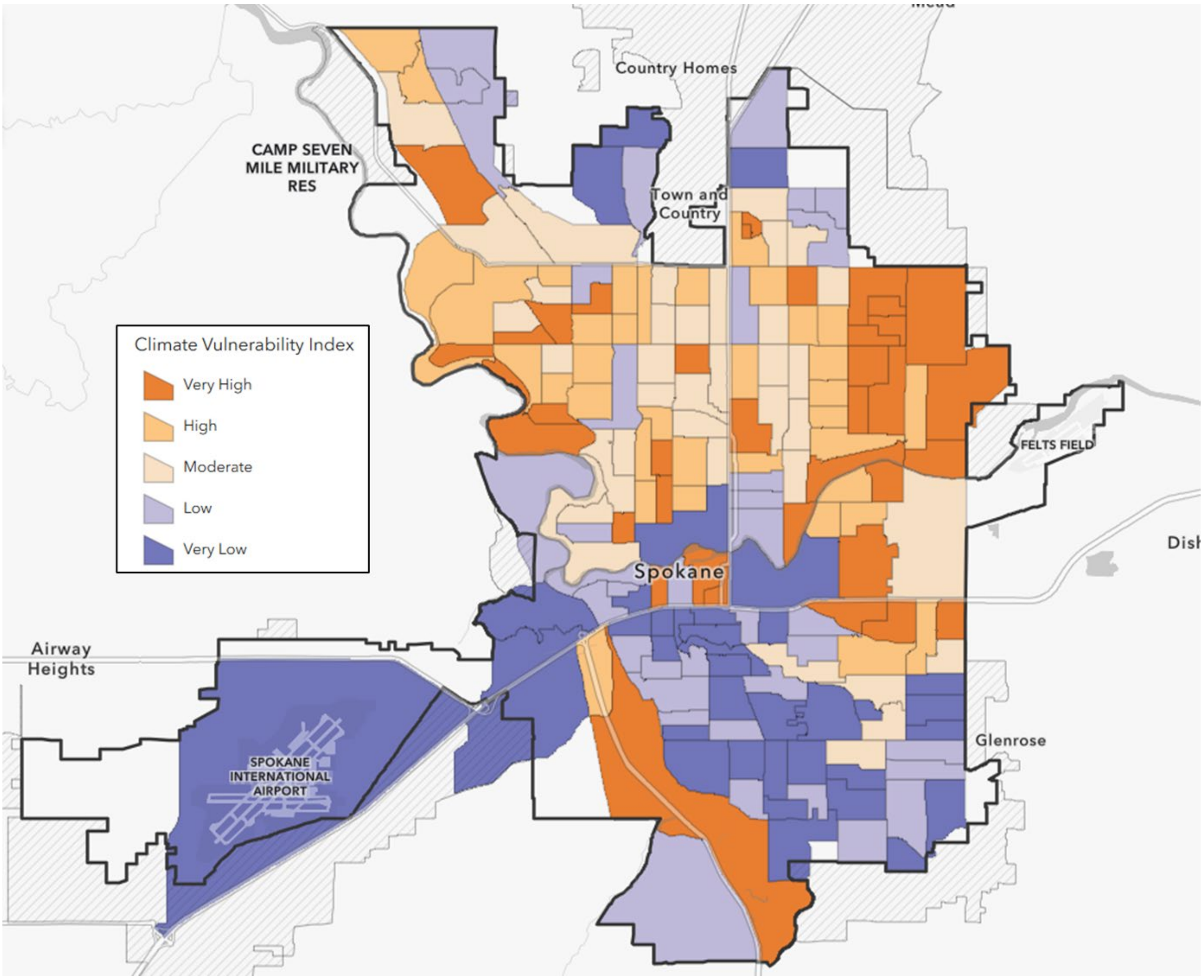
4.5 Climate Vulnerability

The Spokane Climate Vulnerability Index (CVI), prepared as part of the City's climate planning efforts in the comprehensive plan, helps identify areas, people, and infrastructure in Spokane that are more at risk from changing climate hazards like extreme heat, wildfire risks, and health issues caused by heat and smoke.[52] Climate vulnerability is defined as the combination of exposure to a changing climate, the health and environmental sensitivity to a changing climate, and the capacity of the community and place to cope with the impacts of a changing climate. The CVI combines over 30 indicators of climate vulnerability and identifies which census block groups are more or less vulnerable to extreme heat or extreme precipitation, relative to other areas in the city of Spokane.

Like the DOH Environmental Health Disparities Map, **the Spokane Climate Vulnerability Index idenfities that neighborhoods in NE Spokane have the highest level of climate vulnerability**, particularly Hillyard, Bemiss, Minnehaha, and East Central. See Figure 46

[52] City of Spokane. (2025). *Spokane Climate Vulnerability Index.* https://storymaps.arcgis.com/collections/f6e4fae1a4eb400bab2c236ce63b75da

Figure 46. Spokane Climate Vulnerability Index

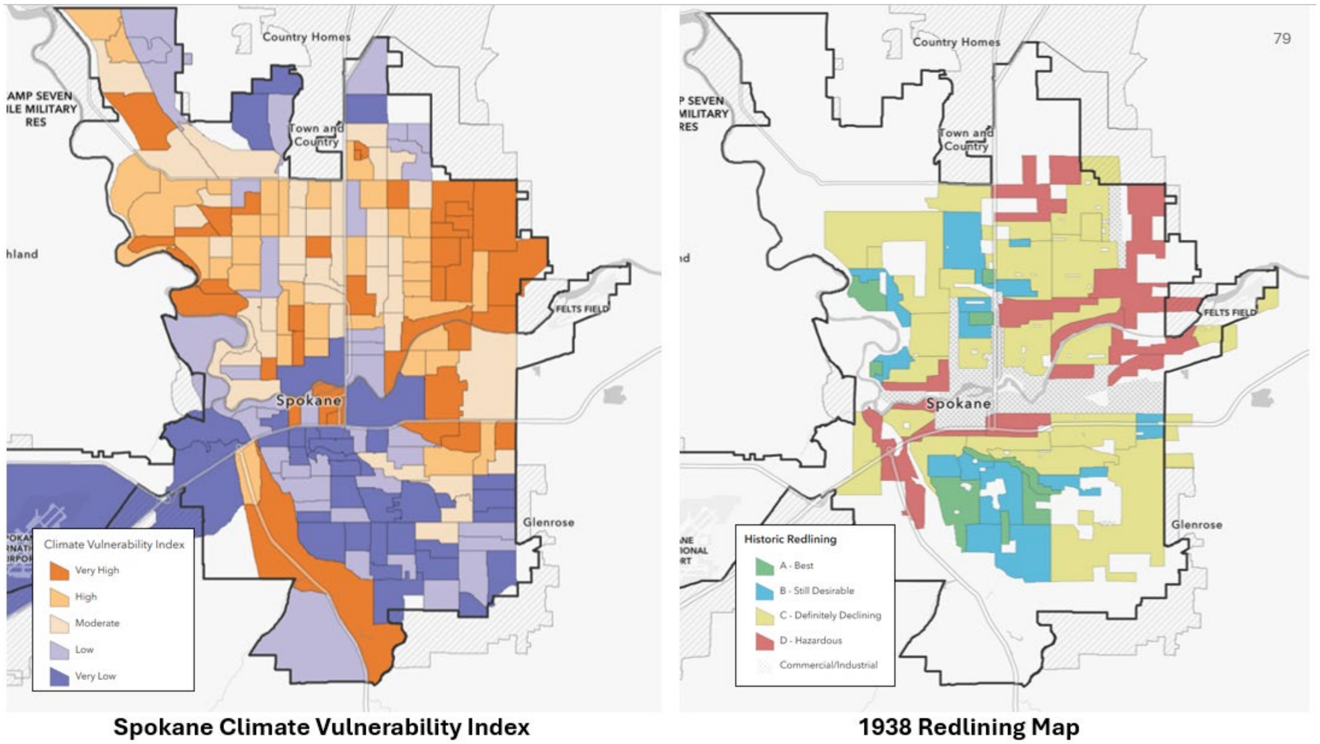


Source: Spokane Climate Vulnerability Index, 2025

Redlining led to a legacy of disinvestment in communities resulting in reduced tree canopy and green spaces, lower-quality housing, and increased impervious surfaces, which are hardened areas like roads, roofs, and parking lots that prevent water from soaking into the ground. This increases stormwater runoff and pollution, decreases the viability of trees, leads to higher temperatures, and contributes to other environmental and human health defects. Redlined areas were subjected to practices like highway construction, railroads, toxic waste siting, and other uses that have created health disparities today. This exacerbates climate risks and has left communities disproportionately vulnerable to climate change impacts like extreme heat.

When comparing climate vulnerability in Spokane today to redlining in the past, there is a pattern between the areas that have higher climate vulnerability and areas that were redlined, particularly neighborhoods in Northeast Spokane and the East Central neighborhood. See Figure 47

Figure 47. Climate Vulnerability and Redlining

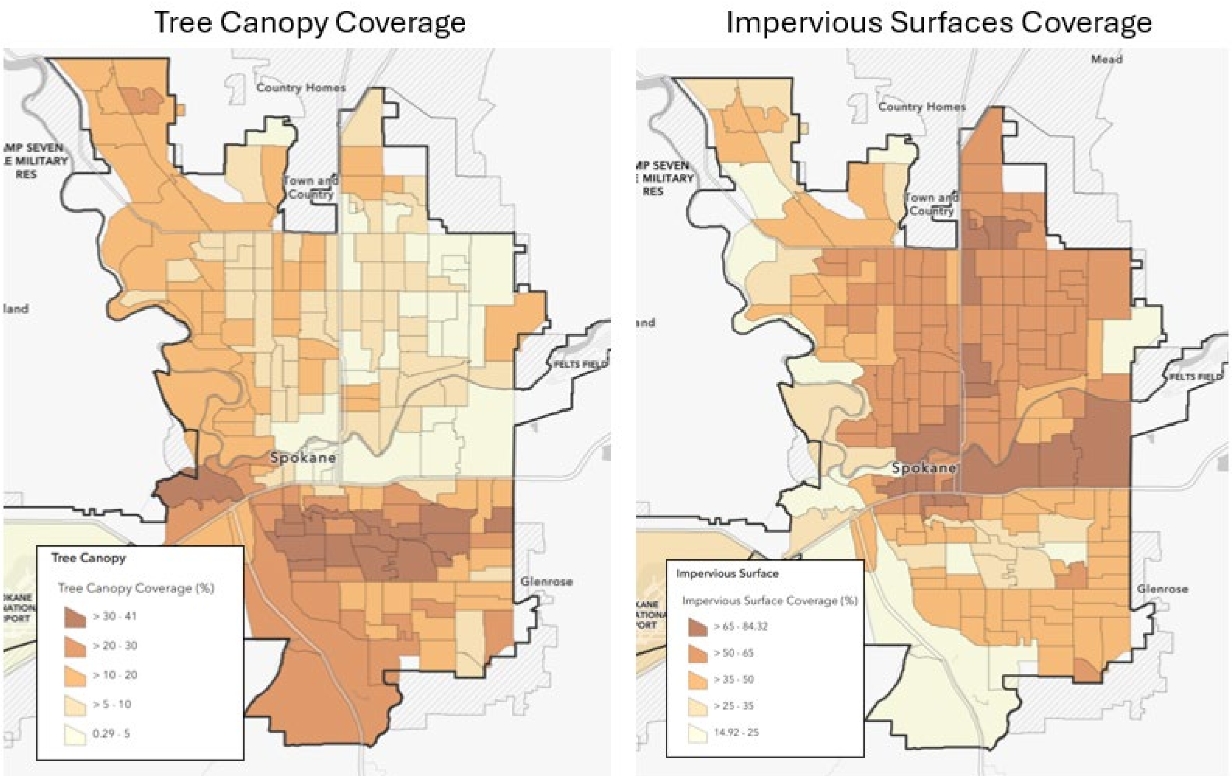


Sources: City of Spokane; Spokane Climate Vulnerability Index, 2025; Spokane HOLC "Redlining" Map

Relating to climate vulnerability, neighborhoods in Northeast Spokane have the lowest percent of tree canopy coverage and higher impervious surfaces coverage, particularly Hillyard, Bemiss, Minnehaha, Chief Garry Park, and East Central. Spokane on average has 20% canopy coverage, with the highest tree coverage being in neighborhoods on the South Hill at almost 40% canopy coverage.[53] Compare that with Northeast Spokane which has the neighborhood with the lowest tree canopy coverage and an average of 13% canopy coverage, lower than the city average, and significantly lower than the South Hill. See Figure 48

[53] The Lands Council. Urban Forestry – SpoCanopy & CoolCanopy. https://landscouncil.org/urban-canopy

Figure 48. Tree Canopy and Impervious Surface Coverage



Source: City of Spokane; Spokane Climate Vulnerability Index, 2025

4.6 Life Expectancy Outcomes

Disparities in access to services, education, and quality of environment, determined by where people can access housing, have long term impacts on their health. The Spokane Regional Health District (SRHD) provides the County Health Insights Eye on Equity to identify, communicate, and improve health inequity by illustrating differences in health and well-being across different groups within Spokane County.[54] SRHD defines health inequity as differences in population health that can be traced to unequal economic and social conditions and are systemic and avoidable – and thus inherently unjust and unfair.

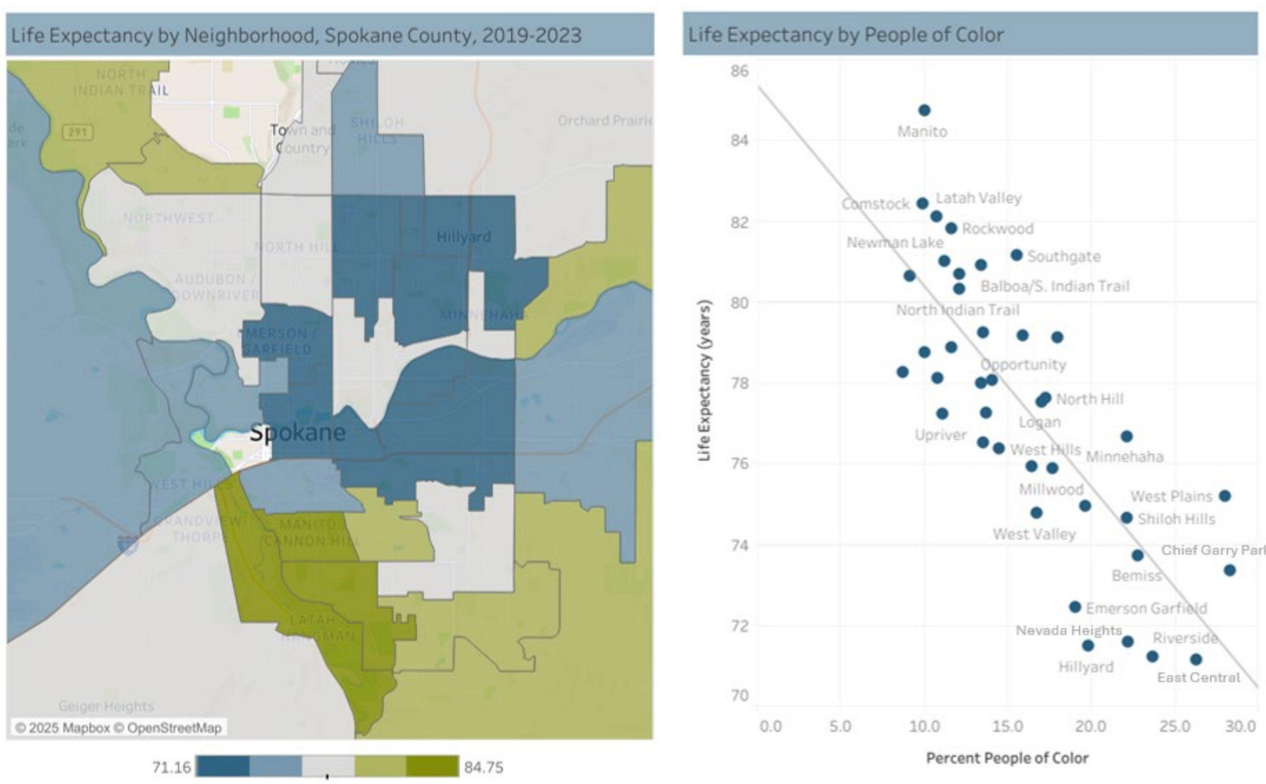
Different neighborhoods have different access to stable housing, quality schools, good jobs, and affordable healthcare, leading a neighborhood or a zip code to be a strong indicator of life expectancy. Life expectancy varies significantly between zip codes, even within the same city or county, and is often influenced by socioeconomic and environmental factors.

[54] Spokane Regional Health District (SRHD). (2023). *Spokane County Health Insights Eye on Equity.* https://countyhealthinsights.org/county/spokane/dashboard/eye-on-equity-life-expectancy/

The average life expectancy in Spokane is 76.9 years,[55] lower than Spokane County at 78.2 years and Washington State at 79.6 years.[56] **In the city of Spokane, there is a 13.6-year difference between the neighborhoods with the highest life expectancy of 84.75 years and the neighborhood with the lowest life expectancy 71.16 years.** The neighborhoods with the lowest life expectancy outcomes are in Central Spokane, including East Central, Riverside and West Central, and Northeast Spokane, including Hillyard, Whitman, and Nevada Heights. Neighborhoods on the South Hill have higher life expectancy outcomes, in particular Manito/Cannon Hill, Comstock, Latah/Hangman, Rockwood, and Southgate.

There is a relationship between life expectancy and where people live. Neighborhoods with lower life expectancies also contain a higher percent of BIPOC population. Racial groups within neighborhoods also have different life expectancy, with lower life expectancy outcomes for American Indian and Alaska Native, Black, Hispanic, and Native Hawaiian and Other Pacific Islander. In Manito/Cannon Hill, with the highest life expectancy at 84.75 years, Black residents have a lower life expectancy by 24 years than White, Non-Hispanic and Hispanic residents. See Figure 49

Figure 49. Life Expectancy by Neighborhood and Race, 2023



Source: Spokane Regional Health District, 2023

[55] Spokane Regional Health District, 2023

[56] EWU Institute for Public Policy and Economic Analysis. Spokane Trends. (2025). *5.1.8 Life Expectancy by Zip Code: Average Top 5 to Bottom 5 Zip Codes.* https://www.spokanetrends.org/graph.cfm?cat_id=5&sub_cat_id=1&ind_id=20

5. Exclusion In Housing

Exclusion is the act or effect of shutting or keeping certain populations out of housing within a specified area, in a manner that may be intentional or unintentional, but which leads to non-inclusive impacts.[57] Exclusion is assessed by examining patterns of segregation, that is identifying areas of the city in which the population does not reflect the composition of the overall population. Exclusion may extend beyond race to income, ethnicity, or other sociodemographic characteristics. Analysis of these other factors indicates areas where land use policies may have had a segregating impact.

5.1 Publicly Subsidized Affordable Housing

Publicly supported affordable housing provides access to safe, affordable housing for households within specific income limits.[58] Some publicly supported housing is owned and operated by the Spokane Housing Authority (SHA) and others by not-for-profit or for-profit entities. The Spokane Housing Authority offers housing choice vouchers (HCV) for households to use to rent private housing can segregate voucher-users into low-rent areas.

Housing incentives for affordable housing projects like Low Income Housing Tax Credits (LITHC) and Multi-Family Tax Exemption (MFTE) appear to be consistently distributed within several areas of Spokane. **The highest concentration of housing choice voucher usage is located in Central Spokane,** particularly downtown in the Riverside neighborhood (more than 750 units), and in the East Central and Chief Garry Park neighborhoods. **See Figure 50.** When housing patterns or policies concentrate subsidized housing into a few areas, it may mean that low-income households have reduced choice and access to places of opportunity.

The Spokane 2024 Fair Housing Plan found that Black and Indigenous people participate in publicly supported housing programs at higher rates than other people.[59] The percent of households participating in HUD subsidized housing programs who are Black, non-Hispanic in Spokane has remained between 7-8% since 2014, while American Indian and Alaska Native made up 4% of all HUD subsidized housing program participants.

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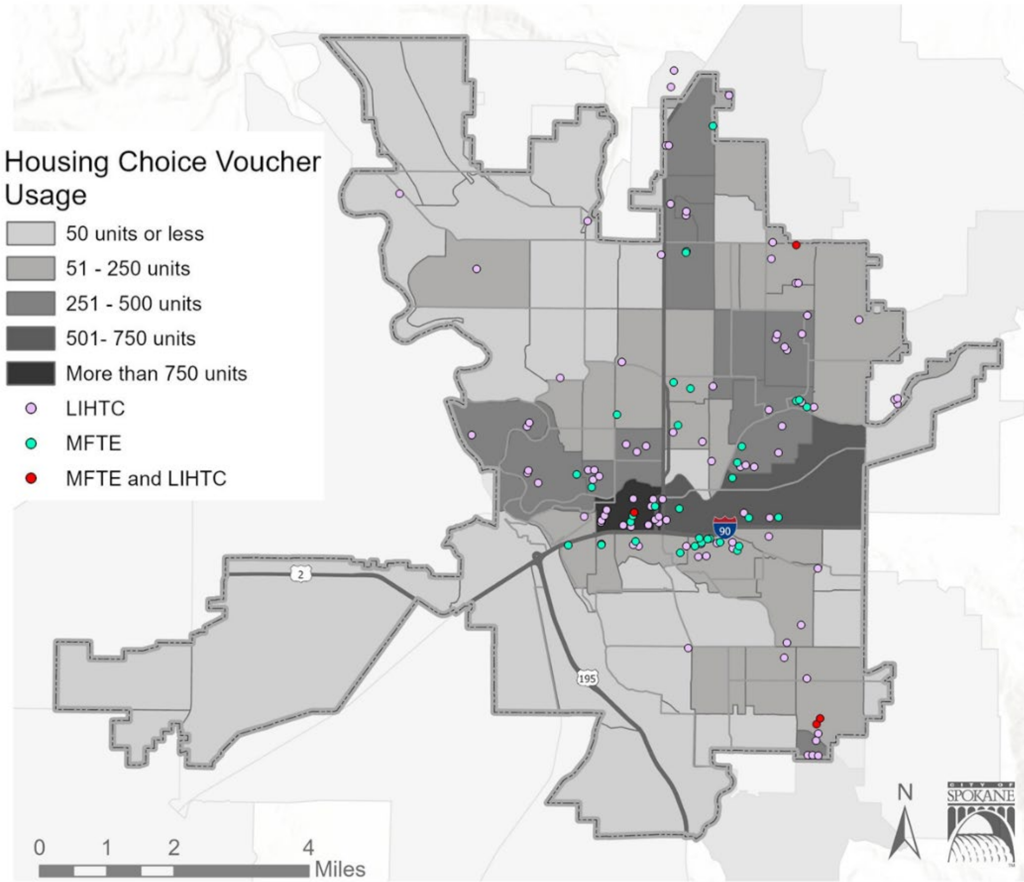
[57] Commerce, 2023a
[58] Commerce, 2023a
[59] City of Spokane, 2024a

Figure 50. Publicly Subsidized Affordable Housing



Sources: City of Spokane; Spokane Housing Authority - Housing Choice Voucher usage data, 2020-2024; City of Spokane Planning Services - MFTE and LIHTC project locations, 2024

People with disabilities are disproportionately represented among publicly supported housing programs, making up over 40% of participants. Additionally, 68% of HCV participants have a disability, and the majority of these are single person households (76%). However, there is a shortage of available subsidized accessible units and private market units which HCV rent standards will cover. **The Fair Housing Plan found that accessible units are majority found in newly constructed multi-unit housing, due to the requirements and exemptions in the Fair Housing Act for design and construction. People with disabilities are thus often limited to residing in areas with multi-unit housing, which includes a concentration of usage downtown and in neighborhoods farther north.** People with physical disabilities are likely to have less opportunity to reside in areas with predominantly single-unit housing. Additionally, people with disabilities are also often dependent upon public transportation, which further limits housing choice to regions of the city to where they can access public transportation.

In 2019, SHA converted all 125 public housing units to project-based vouchers under the HCV program, which the Fair Housing Plan identified as a concern for the loss of public housing.[60]

[60] City of Spokane, 2024a

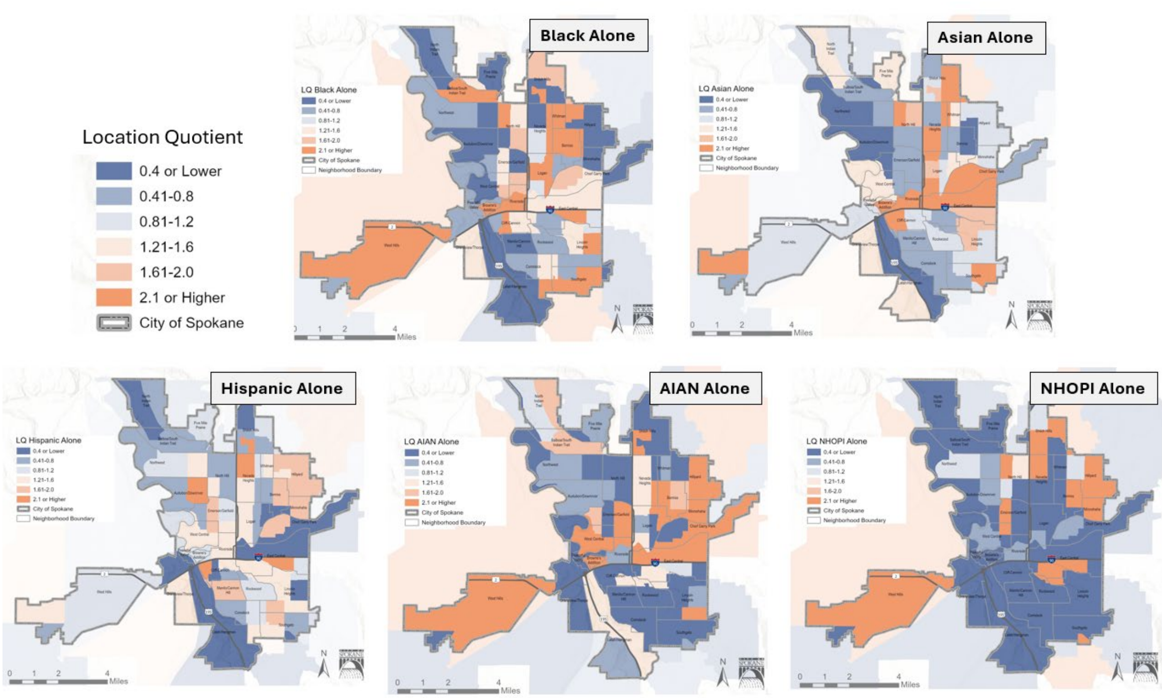
5.2 Concentrations of Population Groups

Another way to assess segregation is by using a location quotient.[61] The location quotient is a measure of how concentrated a particular demographic group is within an area. Calculating the location quotient of a specific demographic group can show the relative concentration of that group in each census tract relative to the city as a whole.

- **Equal:** A value of 1 means the census tract has the same proportion of people of a race/ethnicity than the County.
- **Higher:** A value higher than 1 means the census tract has a higher proportion of people of a race/ethnicity than the County, meaning where people are segregated.
- **Lower:** A value lower than 1 means the census tract has a lower proportion of people of a race/ethnicity than the County, meaning where people are excluded.

Northeast Spokane has the highest diversity in the city, and many neighborhoods have a location quotient over 1, with a higher concentration of Black, American Indian and Alaska Native, and Native Hawaiian and Other Pacific Islander populations. Asian and Hispanic populations are slightly less concentrated but still follow a similar pattern in Northeast Spokane. AI/AN and NHOPI populations are almost entirely excluded from neighborhoods in South Spokane and Northwest Spokane. NHOPI populations are most concentrated and primarily live in northeast Spokane and East Central. Hispanic populations are most evenly distributed throughout Spokane, with a large number of neighborhoods with a location quotient close to 1. See Figure 51

Figure 51. Concentration of Race/Ethnicity in Neighborhoods



Source: City of Spokane; PolicyMap, 2025.

[61] Commerce, 2023a

5.3 Employment and Access to Jobs

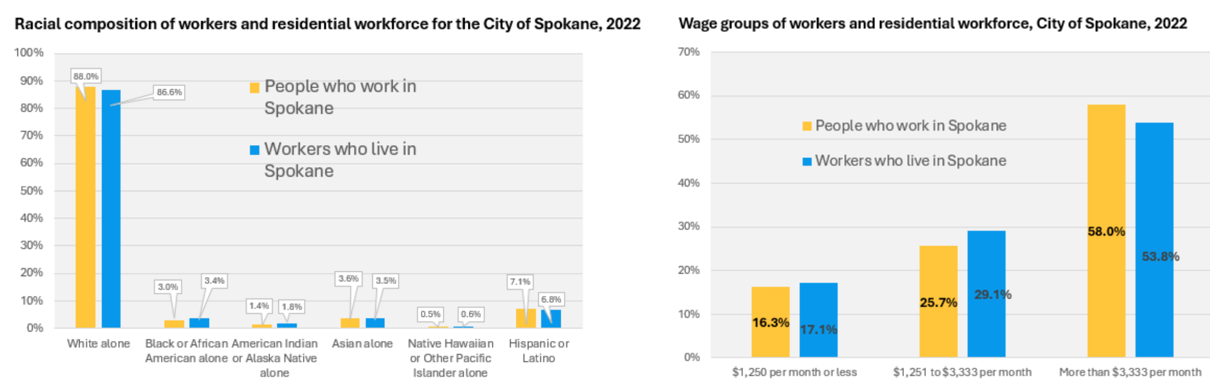
People of all racial and ethnic backgrounds should have equitable access to Spokane's employment opportunities.[62] However, BIPOC households have encountered many structural barriers to accessing housing in high demand areas due to such factors as racially restrictive covenants and regulations that prohibit housing suited to their needs. One approach to assess whether there is evidence of exclusion from a jurisdiction as a whole is to compare the racial profile of the local workforce (the people who work in a jurisdiction) to the workers who live in a jurisdiction (the working residents) to see if the residential profile and the workforce profile are similar or different, which would suggest an exclusionary effect in housing.

The racial profile of the Spokane workforce is similar to the overall demographics of the city. A slightly larger proportion of the people who work in Spokane are White (88%) than compared to the workers who live in Spokane (86.6%). There are slightly more people of color who live in the city of Spokane than people of color who work in the city of Spokane. The data suggests a lack of residential exclusion of BIPOC households from living within the city. See Figure 49

For workers who earn less than $3,333 per month, there is more workers who live in Spokane, than people who work in Spokane. For workers who earn more than $3,333 per month, there is more people who work in Spokane than workers who live in Spokane. However, higher income earners have more access to housing choice. This data suggests that there is housing opportunity across all income groups for workers in the city of Spokane.

Overall, while there are clear impacts to housing access by income and race for different areas within the city of Spokane, the data does not suggest that people who want to live in Spokane are excluded from doing so based on race or income. This is likely due to Spokane being the leader in the region for affordable housing provision and a diversity of housing types that provide a range of options for residents and their needs.

Figure 52. Composition of Workers and Residential Workforce, 2022



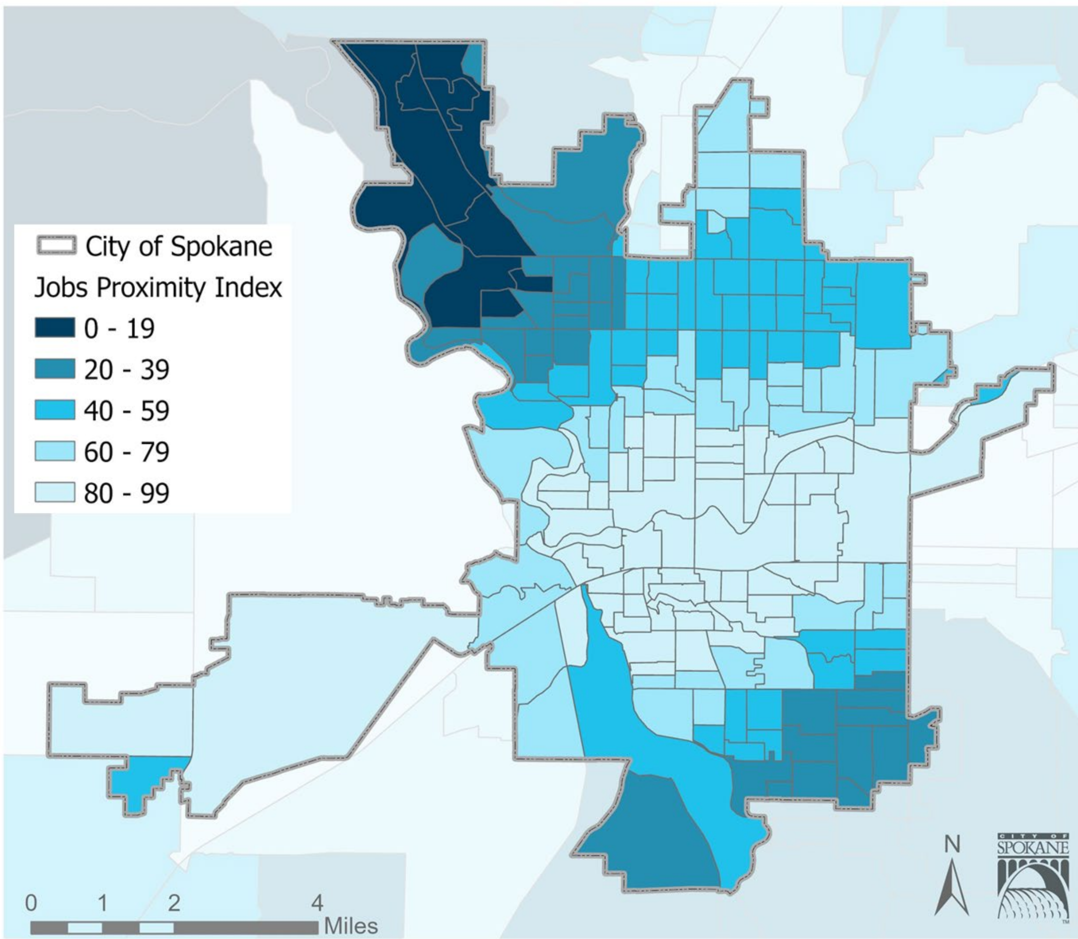
Source: City of Spokane; US Census Bureau LEHD Origin Destination Employment Statistics (On TheMap), 2022

[62] Commerce, 2023a

5.4 Jobs Proximity & Commute Burden

The jobs proximity index quantifies the accessibility of a given census block group related to its distance to all job locations within Spokane, with larger employment centers weighted more heavily. The higher the index value, the better access to employment opportunities for residents. **Due to I-90, areas closer to downtown have better access to jobs compared to those on the outskirts of the city, suggesting there is not an exclusion to jobs proximity.** See Figure 53

Figure 53. Jobs Proximity Index



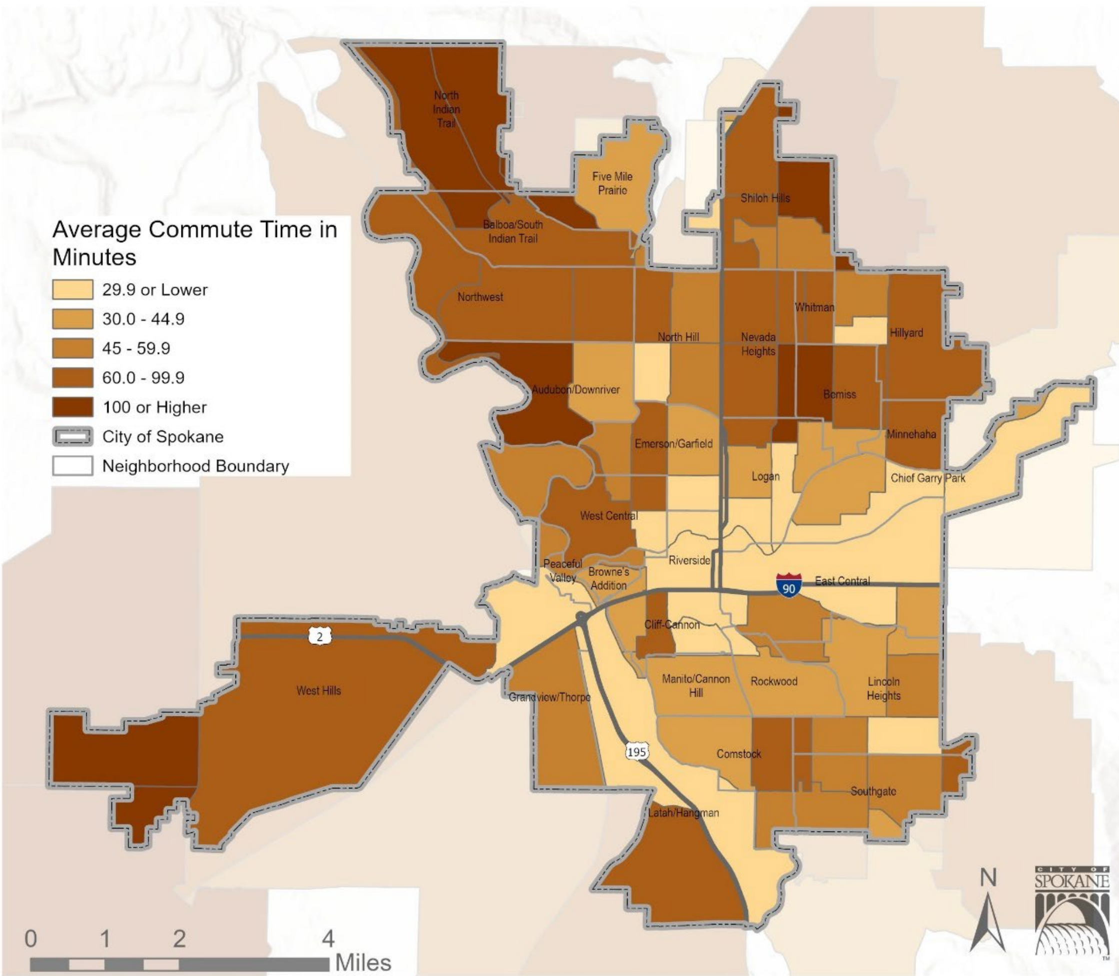
Source: City of Spokane*; HUD AFFH-T Data documentation-AFFHT0006, 2020*

Looking further at commute burden can identify if different populations experience different work commute lengths, which may be due to lack of affordable housing near job centers, inadequate transit and segregation impacts of historical housing policies.[63] By examining travel time at the Census tract level alongside race, ethnicity and income data, analysis can explore whether certain subgroups are impacted by commuting.

[63] Commerce, 2023a

In Spokane, Census tracts at the edges of the city, especially north and west, have a higher commute burden (60 minutes or higher) compared to those closer to downtown. Understanding the demographic concentration of people of color in northeast Spokane, East Central, and the central city, the commute trends suggest there is not a racially disparate impact for commute burden. **The proximity to I-90 in East Central and Riverside neighborhoods, which historically and currently have higher populations of communities of color, suggest a lower commute burden but is still reflective of the legacy of divisive highway infrastructure and a reminder of the benefits and burdened associated with proximity to transportation corridors.** See Figure 54

Figure 54. Average Commute Time in Minutes

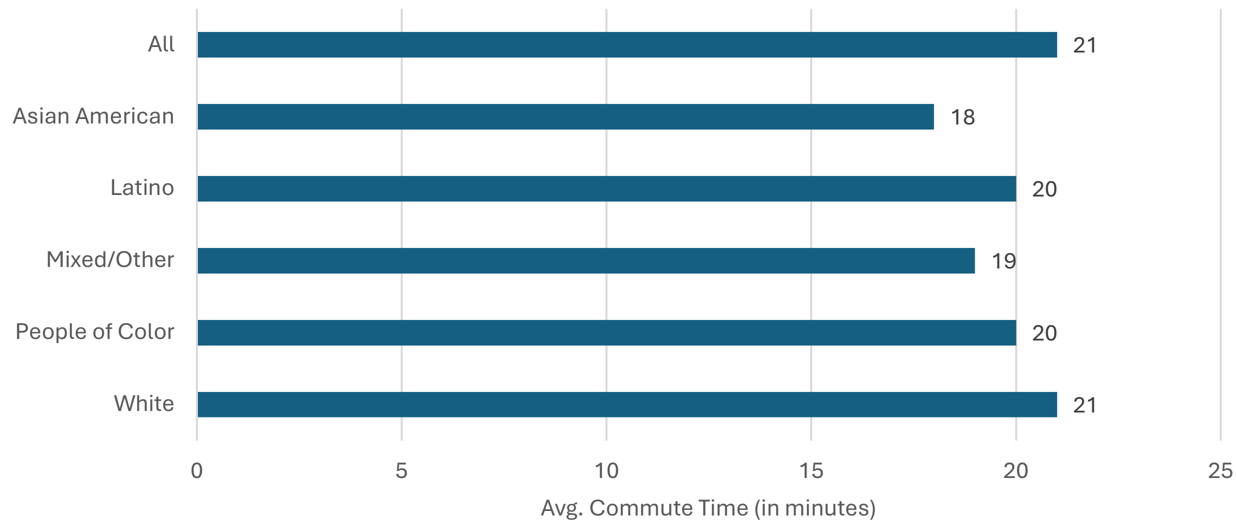


Source: City of Spokane; US Census Bureau, 2019-2023 ACS-5 Year Estimates

Data suggests there is a slightly higher commute burden for people of color below the 200% poverty level. While the commute is shorter for those in Central Spokane and East Central, it comes at high cost of noise and air pollution, environmental harms, and increased health disparities. See Figure 55

White residents have the highest commute burden when comparing race and income levels. This commute burden generally aligns with neighborhoods also that have higher household incomes and higher homeownership census tracts in the northwest and southwest, which suggests that wealthier people are able to live further from the city center.

Figure 55. Commute Burden by Race, 2022

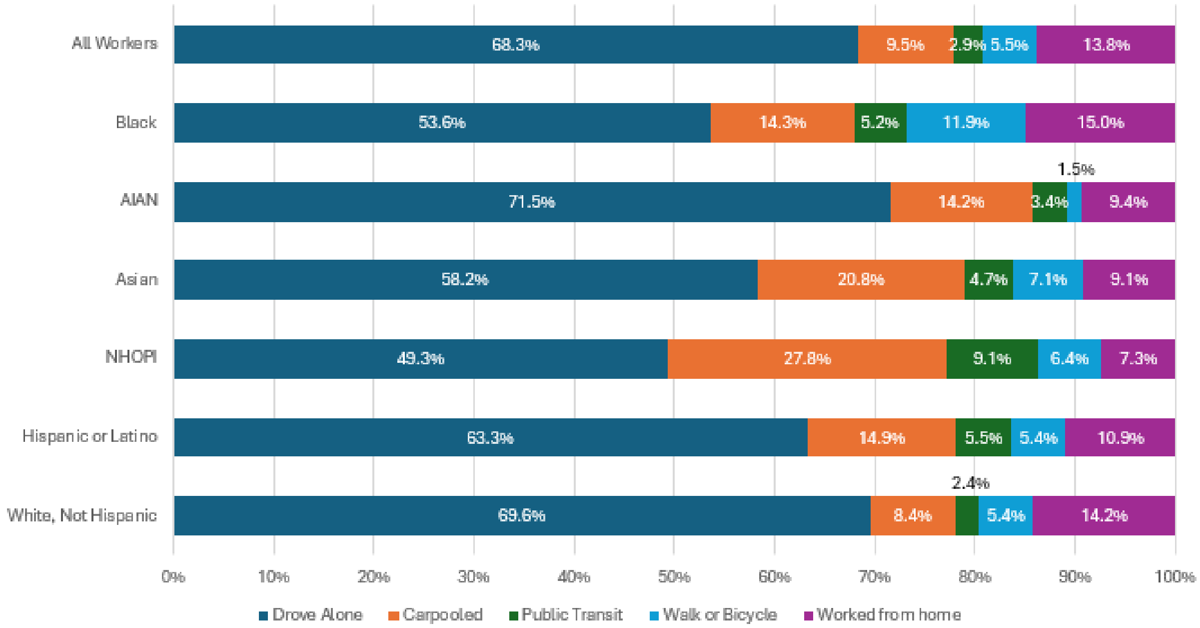


Source: City of Spokane; National Equity Atlas, IPUMS USA, https://nationalequityatlas.org/indicators/Commute_time?geo=07000000005367000

For means of transportation to work, 68% of workers in Spokane drove to work alone. **See Figure 56.** Specific findings suggest differing access and proximity to housing, jobs, and are reflective of income levels:

- American Indian and Alaska Native workers and White, Not Hispanic workers had the highest percentage of driving to work alone, both higher than the average of all workers.
- American Indian and Alaska Native had the lowest use of public transit, which could suggest living far from public transit routes.
- Asian workers had high rates of carpooling, while Native Hawaiian and Other Pacific Islander workers had the highest percentage of public transit use and carpooling.
- Black workers had the highest rate of working from home, and nearly double walking or cycling to work than other racial groups, while also high rates of carpooling.
- White, Not-Hispanic workers had the lowest use of carpooling and public transit use of any race/ethnicity group.
- All workers of color had higher rates than the city level for transportation by other means than driving alone, including taking public transit.

Figure 56. Means of Transportation for Workers by Race/Ethnicity, 2023



Source: City of Spokane; U.S. Census Bureau, U.S. Department of Commerce. (2023). Means of Transportation to Work. American Community Survey, ACS 5-Year Estimates Detailed Tables. Tables B08105 A-I

6. Displacement

In addition to analyzing racially disparate impacts regarding access to housing and the outcomes associated with where someone is able to live, it is also important to consider the potential risk of losing that housing. Displacement is when a household is forced or pressured to move from their community by factors outside of their control.[64] Displacement can have a life-changing negative effect on households that are directly impacted. It can also disrupt the social fabric and networks of trust and support that exist within a community. Displacement can happen to households, businesses, and community institutions. Importantly, the scale of displacement analysis should be at the neighborhood level; that is, whether households or businesses are forced out of their neighborhood.

While displacement due to rising costs is the most common form, there are many forms of displacement, including:

- **Economic displacement**: Displacement due to inability to afford rising rents or costs of homeownership like property taxes.
- **Physical displacement**: Displacement resulting from eviction, acquisition, rehabilitation or demolition of property, or the expiration of covenants on rent-or income-restricted housing. Climate-related displacement, such as increasing flood risk, dangerous heat or forest fire, falls into this category.
- **Cultural displacement**: Residents are prompted to move because the people and institutions that make up their cultural community have left the area. This may also include displacement as residents seeking opportunities such as education, employment, amenities, or community institutions cannot find them within their neighborhood.

6.1 Demographic Change

While Spokane has grown consistently over the last decade, the growth has not been spread equally across the city. **There has been higher percent change in total population between the 5-year periods of 2014-2018 and 2019-2023 in Central Spokane and pockets in Northeast and Southeast Spokane, particularly on the southeastern edge of the city.** There has been percent decrease in Northwest Spokane, as well as areas closer in neighborhoods in West Central and Chief Garry Park. See Figure 57

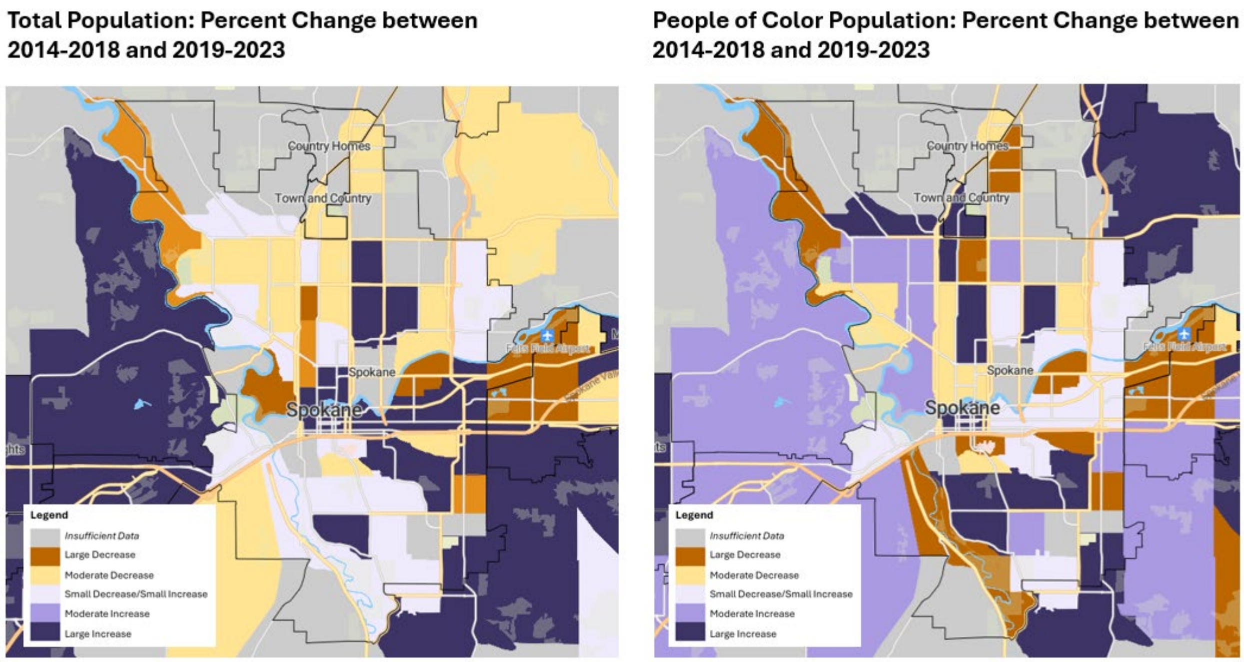
When looking at the percent change in the count of BIPOC population over the same time periods, the majority of Census Tracts in Spokane experienced population growth in BIPOC population, particularly in South Spokane in areas that have had historically lower BIPOC populations. This suggests an increase in integration into areas that have historically had more exclusion.

In contrast, **areas that have historically had larger BIPOC populations saw a decrease in BIPOC population during the same time frame**, including East Central and Chief Garry Park neighborhoods, which can suggest displacement or gentrification within these historic cultural

[64] Commerce, 2023a

communities. Areas that had a decrease in total population but an increase in BIPOC population include the West Central, Bemiss, Minnehaha, and Grandview/Thrope neighborhoods.

Figure 57. Population Percent Change, 2014-2023

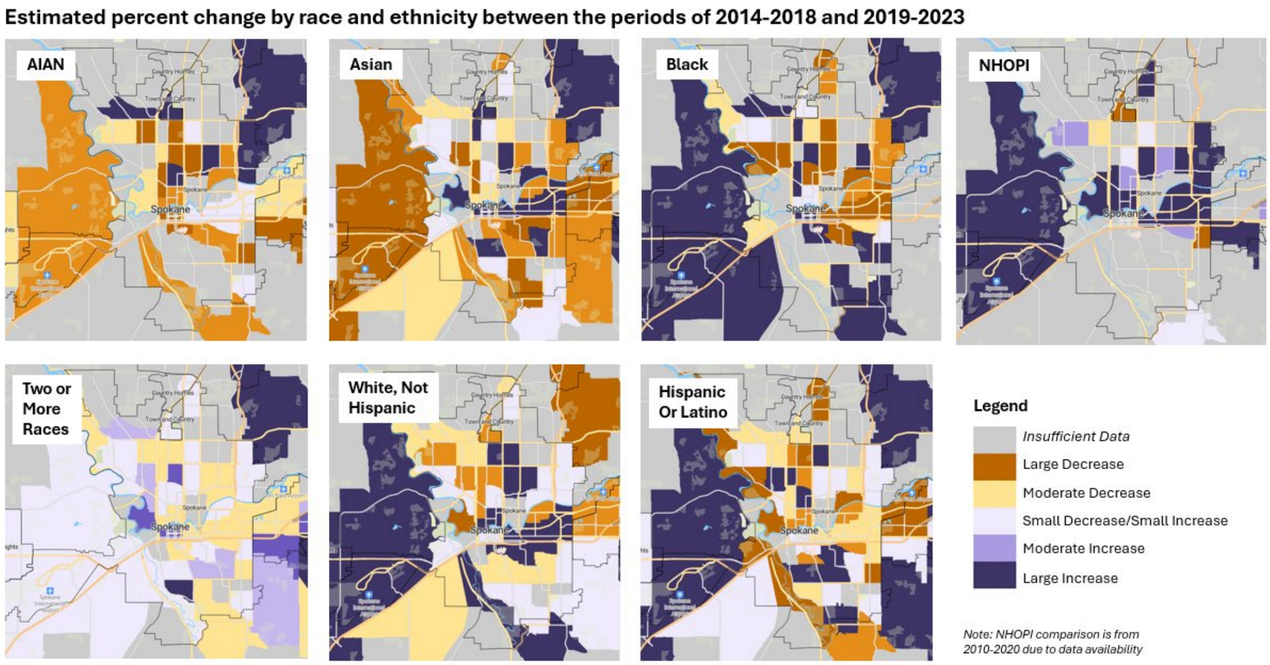


Source: PolicyMap. (n.d.). Estimated percent change in the number of the population between the periods of 2014-2018 and 2019-2023 [Map based on data from Census: US Bureau of the Census]. http://www.policymap.com

When looking more specifically at changes in the East Central Neighborhood, population groups that had a moderate to large decrease in proportion of that population within the Census Tract were Black, Two or More races, and Hispanic or Latino populations. East Central saw an increase in proportion of American Indian and Alaska Native, Asian, and Native Hawaiian and Other Pacific Islander populations, as well as a larger increase in the proportion of White, Not Hispanic and Latino populations. As a diverse neighborhood with a historically Black population, the increases in proportion of other races within East Central, along with a decrease in the Black population, suggests potential ongoing displacement of Black residents.

The Chief Garry Park Neighborhood saw a decrease among Asian, Black, Hispanic or Latino, and White, Not Hispanic residents while seeing an increase in Native Hawaiian and Other Pacific Islander, Asian, and multiracial populations, suggesting shifting population demographics over time. **See Figure 58**

Figure 58. Population Percent Change by Race and Ethnicity, 2014-2023



Source: PolicyMap. (n.d.). Estimated percent change in the number of the population between the periods of 2014-2018 and 2019-2023 [Map based on data from Census: US Bureau of the Census]. http://www.policymap.com

6.2 Evictions and Foreclosures

Eviction is the process by which a household is forced to leave their housing due to a failure to meet the conditions of the leasing contract and is a direct form of displacement to the household.[65] People who have experienced eviction are at a greater risk of housing insecurity, vulnerability to exploitation, and homelessness.

Between 2018 and 2022, the highest concentration of evictions in Spokane was in the Central and Northeast neighborhoods, especially those directly north of I-90 or east of Division Street. Downtown (Riverside), West Central, and Shiloh Hills neighborhoods had the highest number of evictions overall, while Shiloh Hills, Minnehaha, and West Hills had the most individual properties with the highest number of evictions. **See Figure 59**

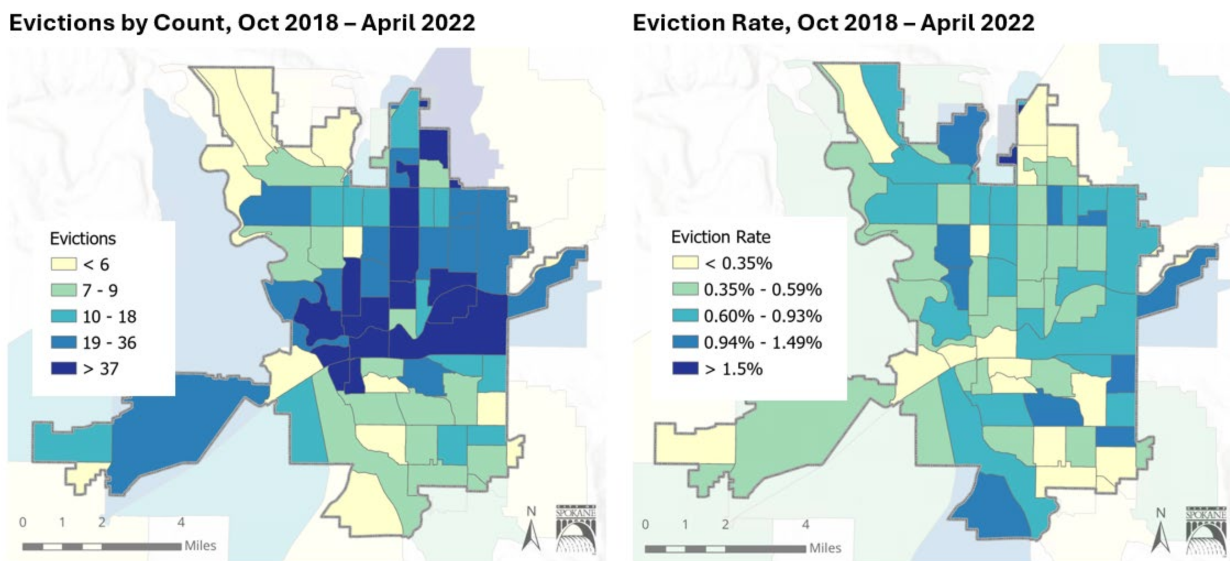
During the COVID pandemic, the City of Spokane had an eviction moratorium, initially implemented as part of the state-wide eviction moratorium. The state-wide moratorium ended in June 2021 and the City of Spokane ended COVID protections in July 2023. It is likely evictions have risen since this time, post-eviction moratorium, so the analysis focuses on the difference in concentration of evictions by area, rather than total number.

When considering the concentration of rental housing in each Census Tract, citywide spatial patterns of evictions are less apparent. Areas that do not stand out when looking at eviction count alone, especially those with the highest homeowner rates, stand out as having higher evictions rates because

[65] Commerce, 2023a

those few evictions make up more of the limited rentals units available. On the other hand, areas with more rental opportunities like in Central Spokane appear less impacted by evictions when reviewing eviction rate, rather than total evictions, due to the larger number of rental units available.

Figure 59. Evictions, 2018-2022



Source: City of Spokane; Staal, A., Zickefoose, G., Mutungi, D., Newton, T., Andrie, T., Deitz, S., Ramos, D., and M. Anderson. (2022), Displacement, Houselessness, and Gentrification in Spokane, WA: Empirical Analysis of Housing, Eviction, and PIT Data. Eastern Washington University.

To understand not only where these evictions occurred, but also who was impacted, the demographic data from the *Washington State's Appointed Counsel Program: Baseline Report* (August 2023) was used.[66] The Washington State Appointed Council Program provides legal representation to low-income residents facing eviction in Washington State. Highlighted within the 2024 Fair Housing Plan, the report states that the statewide racial composition of clients served was 54.8% White, 10.4% Black, 6% Native American, and 4% Latino. This means that Black and Native American people disproportionately participated in the right-to-counsel program while facing eviction.[67]

In addition to renters, homeowners face the potential for direct displacement through mortgage foreclosures. Foreclosures affect homeowners who are no longer able to maintain mortgage payments.[68] Foreclosures can indicate the presence of vulnerable homeowners. If a property owner hits financial distress and enters foreclosure, the tenants could be at risk of displacement when the building is sold. In foreclosures, the homeowner and household members are displaced, often at a time with limited financial resources.

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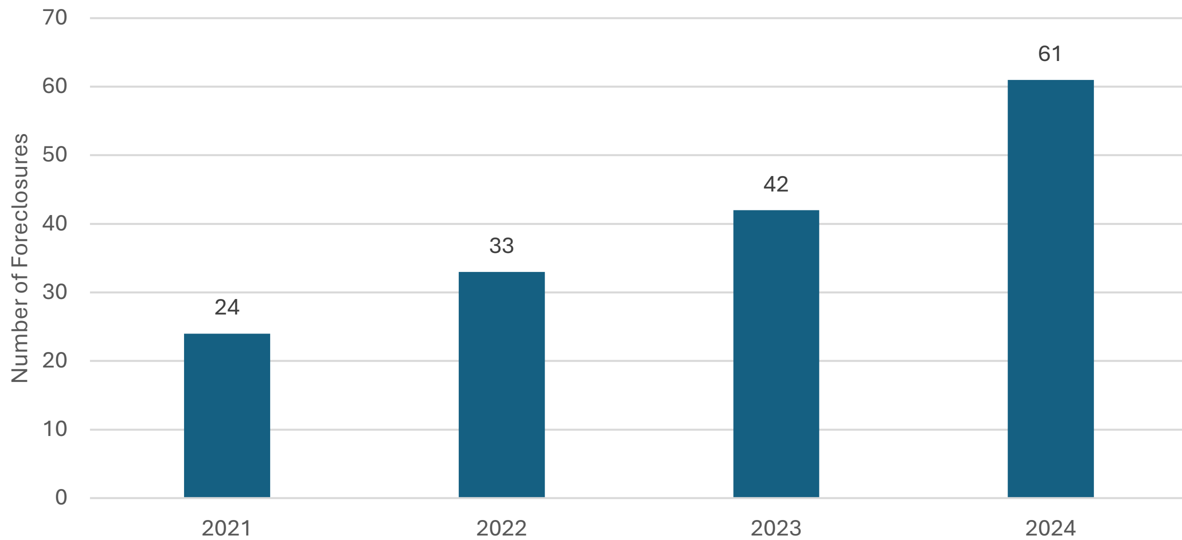
[66] Fyall, R., Martin, K., and von Geldern, W. (2023). *Washington State's Appointed Counsel Program: Baseline Report.* University of Washington. https://ocla.wa.gov/sites/default/files/2025-06/OCLA_202310_FinalReportonImplementationofTenantAppointmentCounselProgram.pdf
[67] City of Spokane, 2024a
[68] Commerce, 2023a

Mortgage foreclosures in the Spokane have increased consistently since 2021, with a total of 160 foreclosures from 2021 to 2024. Foreclosures occurred across the entire city, with a majority being along and north of I-90. **See Figure 60**

Foreclosure can also occur in the context of unpaid property taxes. Tax foreclosure occurs after three consecutive years of non-payment. Between 2021 and 2024, there were also a total of 17 tax foreclosures in the city of Spokane.[69]

Figure 60. Mortgage Foreclosures, 2021-2024



Sources: City of Spokane; Spokane County Auditor Online Recorded Documents, 2021-2024, Trustee Deeds. https://recording.spokanecounty.org/recorder/web/

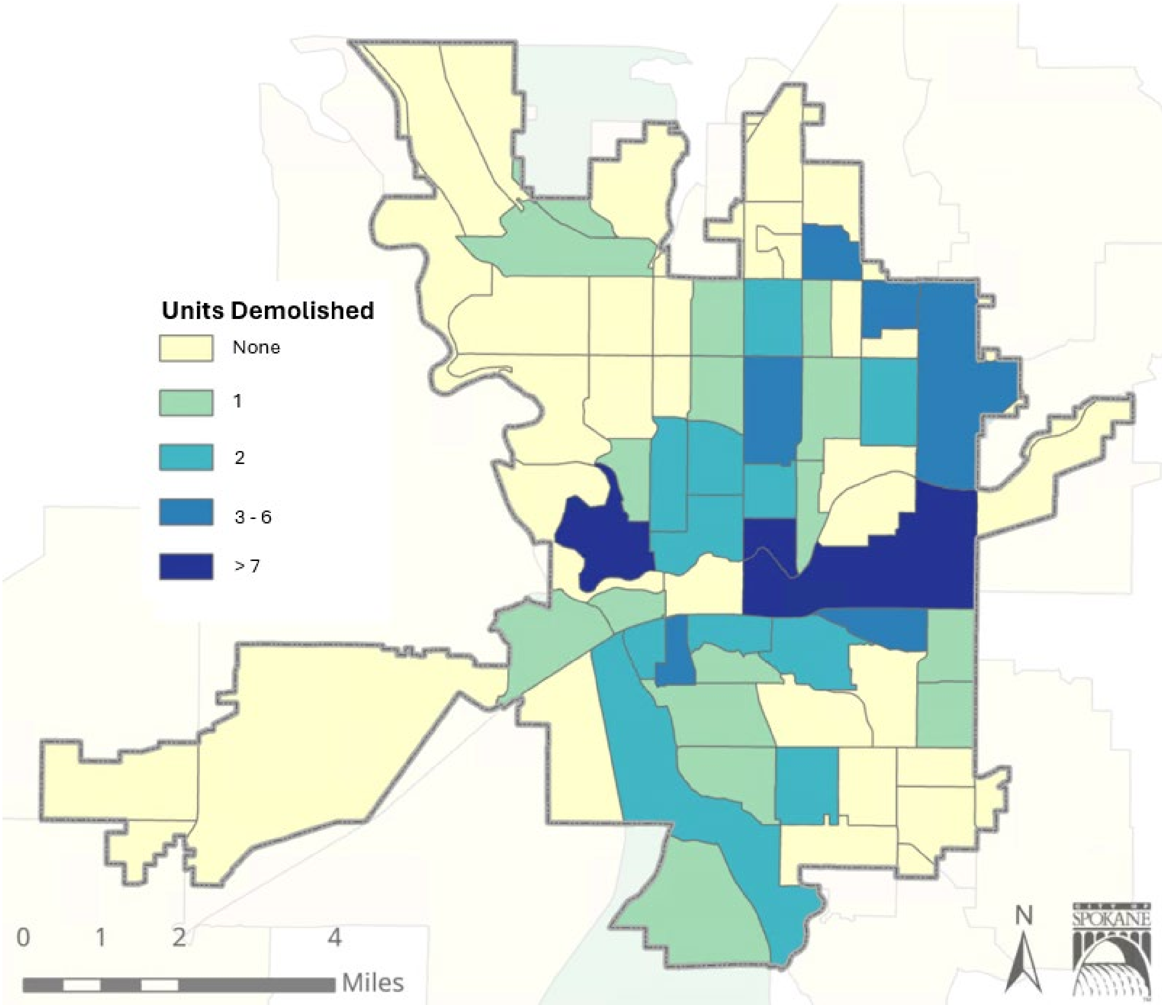
6.3 Demolitions

Reviewing where housing has been lost over time due to demolition, condemnations, natural disasters, conversions, or public acquisition can reveal additional evidence of physical displacement that has already occurred.[70] Though housing units lost may be replaced by new structures through redevelopment, the new development may not meet the needs of the displaced residents, either due to lack of affordability, change is size of unit(s), or the development of a non-residential use. Not only do demolitions and redevelopment displace residents from their homes, but it may also lead to rising housing costs and eventually displace them from their neighborhoods.

A total of 154 residential units were lost in the city to demolitions between 2022 and 2024. Census Tract 145 in East Central had the largest number of demolitions with more than 15 units lost, closely followed by Census Tract 25.03 in Logan and Census Tract 23 in West Central. **See Figure 61**

[69] Spokane County Treasurer
[70] Commerce, 2023a

Figure 61. Housing Units Demolished, 2022-2024



Source: City of Spokane DSC, 2022-2024

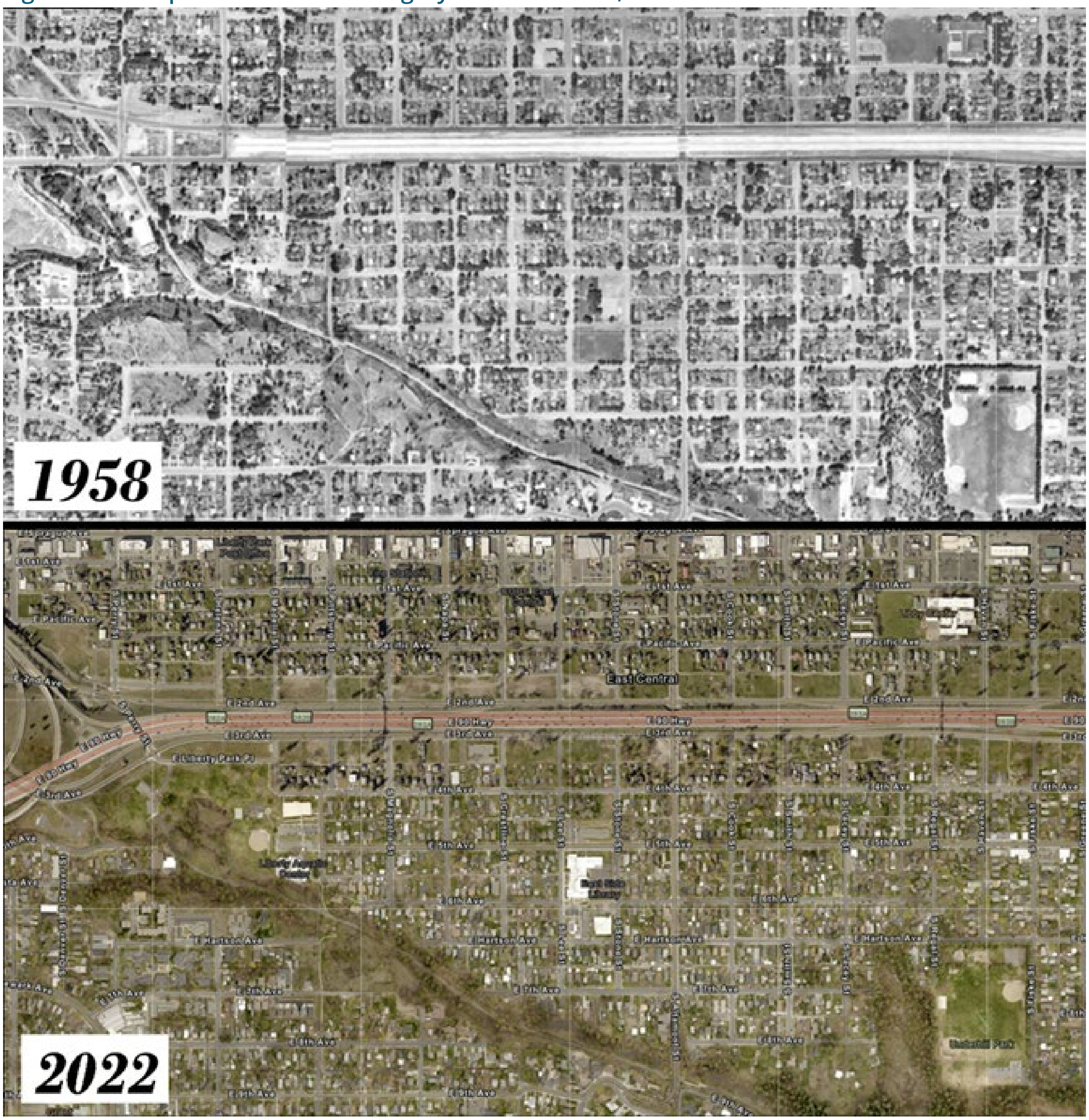
6.3.1 Right of Way Acquisition

Spokane neighborhoods have also experienced displacement through right of way acquisition from freeway building, both historic and ongoing. In East Central, freeway construction by the Federal Highway Administration divided the neighborhood with the I-90 surface level freeway in the 1950s and 1960s as part of the development of the interstate highway system. Federal highway construction across the country had a disproportionately negative impact on Black and Brown communities, often leading to displacement, segregation, and economic disinvestment. Federal highway construction impacted East Central with the same patterns. In 1953, Washington State Department of Transportation (WSDOT) acquired lots for the planned I-90 freeway, and they auctioned off the buildings on the sites.[71] Research provided by the Spokane Office of Historic Preservation outlined: "Some families were willing to sell their homes for the state's offer price, but other's homes were taken through eminent domain."

[71] Spokane Historic Preservation Office, 2023

Research conducted by the New Urban Mobility Alliance (NUMO) in 2025 in partnership with the Carl Maxey Center and City of Spokane, estimated that 657 parcels were removed in East Central for I-90 between 2nd and 3rd Avenues from Liberty Park and Havana Street.[72] **See Figure 62.** Exact uses are not currently available, but most likely would have included residential and commercial parcels. In addition, 19 of 21 acres of Liberty Park were taken over by the freeway.

Figure 62. Comparison of Aerial Imagery in East Central, 1958 and 2022



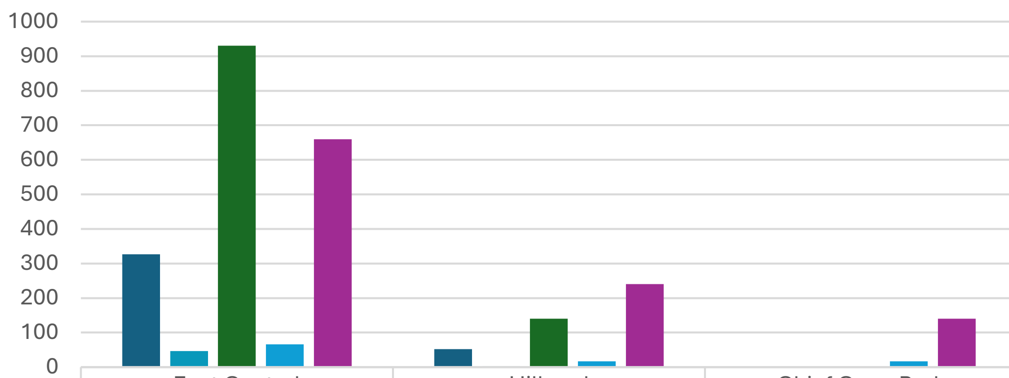
Source: Spokane Historic Preservation Office, 2023

[72] New Urban Mobility Alliance (NUMO). (2025). *Spokane Land Use Analysis.* https://my.spokanecity.org/projects/fifth-avenue-plan/

Around the same time as the I-90 planning, the North Spokane Corridor (NSC) was conceived in the mid-1940s as an alternate north/south route through Spokane.[73] It took more than 50 years of research, planning, legislation, and public input for WSDOT to gain approval for the North Spokane Corridor (US 395), which would once again impact the East Central Neighborhood by connecting the new freeway to I-90 in East Central. To prepare for the construction, WSDOT pursued right of way acquisition to acquire additional properties for the US 395 and I-90 interchange beginning in the early 2000s. Running north and south, US 395 would come to bisect four neighborhoods, Hillyard, Minnehaha, Chief Garry Park, and East Central—all in Northeast Spokane.

In the North Spokane Freeway Final Environmental Impact Statement undertaken by WSDOT in 1997, analysis outlined that the preferred alternative for the US 395 development would displace 450 single family homes and 53 multi-family units for a total of 503 housing units, estimated to be 1,280 people displaced.[74] Additionally, it was estimated that 114 businesses would be displaced, totaling 1,220 employees. By neighborhood, East Central had the greatest displacement with 374 housing units (327 SF and 47 MF units) lost, estimated to be 930 people displaced; as well as 66 businesses, totaling 660 employees. Displacement in Hillyard was estimated to be 54 housing units, 140 people, 17 businesses, and 240 employees. The NSC route through Chief Garry Park did not impact a residential area but displaced an estimated 17 businesses, totaling 140 employees. See Figure 63

Figure 63. Displacements by Neighborhood for the North Spokane Corridor Preferred Alternative, 1997



	East Central	Hillyard	Chief Garry Park
SF Units Displaced	327	52	0
MF Units Displaced	47	2	0
People Displaced	930	140	0
Businesses Displaced	66	17	17
Employees Displaced	660	240	140

Source: City of Spokane; Washington State Department of Transportation, 1997. Note: The table was created using data from the FEIS.

[73] Washington State Department of Transportation (WSDOT). (2025). *Major Project: North Spokane Corridor.* https://wsdot.wa.gov/construction-planning/major-projects/north-spokane-corridor

[74] U.S. Department of Transportation, Federal Highways Administration, and Washington State Department of Transportation (WSDOT). (1997). *North Spokane Freeway Final Environmental Impact Statement and Section 4(f) Evaluation*

The 1997 Final Environmental Impact Statement (FEIS) further outlined displacement impacts in East Central due to the freeway infrastructure: "Displacement of persons living along the south side, and more especially the north side, of I-90 will further erode the neighborhood's residential quality. The area along the north side of I-90 would be reduced from two to one and one-half blocks wide, or even less in some cases. Added to this is a higher level of activity resulting from the freeway and the Sprague Avenue business district, which could further affect neighborhood livability. Stability for single family homeowners would be less certain. Expanding businesses and replacing single family houses with apartments could create a speculative rather than a stable environment."[75]

The FEIS analyzed that widening this section of the I-90 corridor unavoidably displaced many families, particularly minorities, as quoted: "This predominately white neighborhood, where the highest percentage of family displacement occurs, also has higher percentages of minorities than the city as a whole. There is a moderate change in the majority percentage, from 81% within the neighborhood as a whole to 75% within the impacted area."

In East Central, the racial and ethnic characteristics of displaced families included 9.3% Black residents, 5.8% American Indian residents, 2.1% Asian residents, 4.8% Hispanic residents, and 2.7% other racial/ethnic groups—for a total of 24.3% of the population representing people of color. See Figure 64. In the 1990 Census, the closest decennial Census to the FEIS publication, the White, Not Hispanic or Latino population for the city of Spokane was 92% of the population and 8% people of color. For a city with only 1.9% Black population in 1990, 9.3% was more than four times the concentration of Black residents in East Central than the city overall. A similar concentration existed with American Indian and Hispanic populations, which were both 2% of the city's 1990 population, respectively by close to or over 5% in East Central. **This highlights that people of color in East Central, and particularly Black residents, have been disproportionately impacted by displacement from the NSC freeway construction.**

Figure 64. Ethnic Characteristics of Displaced Families in East Central from the US 395 Preferred Alternative in the FEIS, 1997

White	Black	Amer. Indian	Asian	Hispanic	Other
75.3%	9.3%	5.8%	2.1%	4.8%	2.7%
NOTE: Percentages were calculated from US Census data, supplied by SRTC, using block data. The C/D takes are by ½ blocks on either side of the freeway & includes some partial block takes for the NSF/I-90 I/C.					

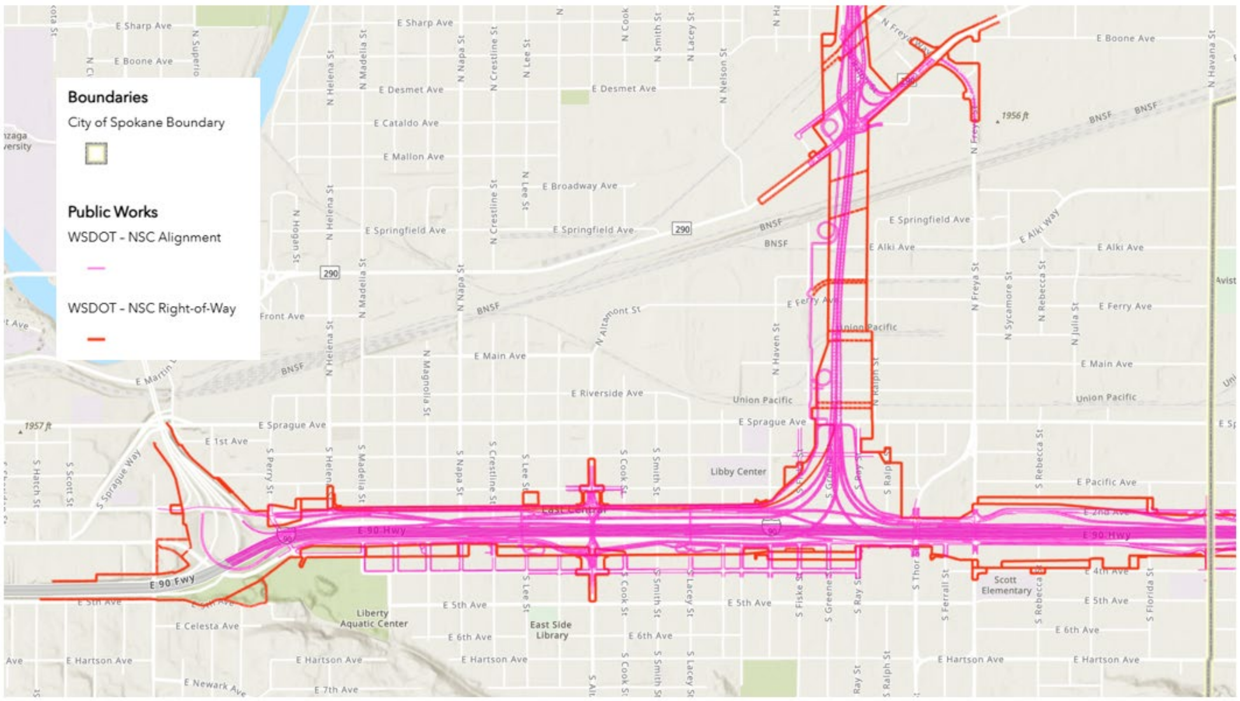
Ethnic Characteristics of Displaced Families
Within the East Central Neighborhood
Table 4-33

Source: WSDOT FEIS, 1997, Page 4-136. Note that the highlight is included in source text to highlight revisions to the body of the text after the September 1995 publication of the Draft EIS.

[75] WSDOT, 1997

As of 2025, the estimated number of housing units displaced in East Central from right of way property acquisition is between 400-450, nearly 100 more than anticipated—located primarily along I-90 immediately north and south of the freeway in Census Tracts 29, 30 and part of Tract 145. There remains a lasting impact from the development of these freeways in East Central and Northeast Spokane, which displaced many Spokane residents and businesses, and disproportionally affected communities of color. **See Figure 65**

Figure 65. North Spokane Corridor Alignment and Right of Way in East Central



Source: City of Spokane; WSDOT

7. Displacement Risk

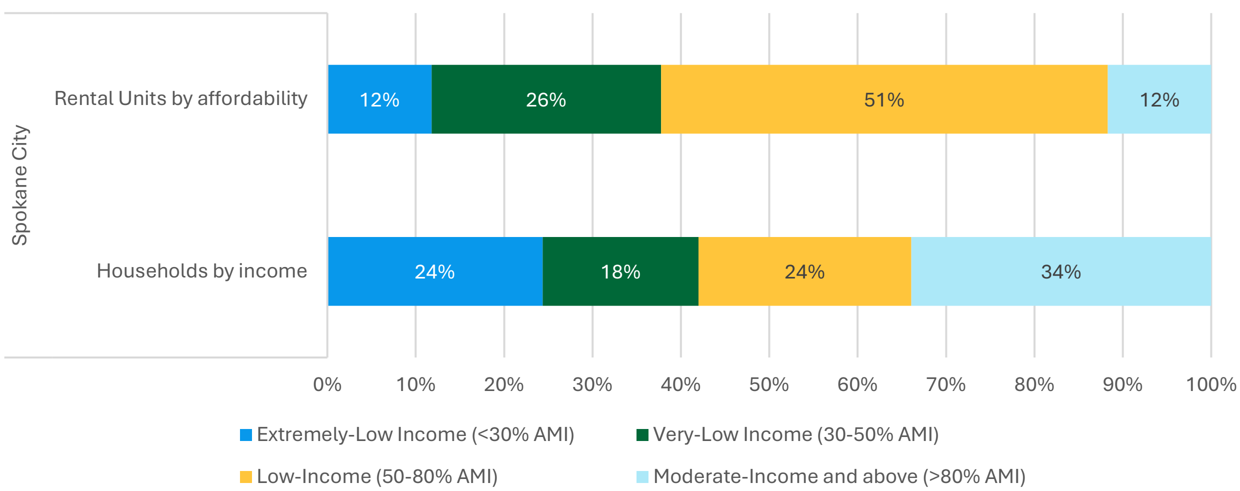
Whereas analysis of displacement assesses where people have been displaced, displacement risk analysis looks at where future displacement is likely to occur given the current and expected market conditions and characteristics of households in the area.[76] The GMA requires communities to identify areas that may be at higher risk of displacement from market forces that occur with changes to zoning development regulations and capital investments (RCW 36.70A.070(2)(g)). Identifying these areas allows a community to better plan for the needs of impacted households and implement protective measures.

7.1 Housing Affordability and Availability

One way to look at housing constraints and losses is to look at the change in rental unit availability by affordability level. HUD CHAS data provides estimates of housing units affordable to households with incomes ranges at various area median income levels, known as AMI.[77] AMI is used to determine eligibility for various housing and income-based programs, varying by household size and income.

In the city of Spokane, extremely low-income households (< 30% AMI) have fewer affordable rental units available to them than other income groups (24% of households earn <30AMI, but only 12% of rental units are affordable to households with that income). Households earning moderate income and above (>80% AMI) also have fewer rental units available to them. See Figure 66

Figure 66. Spokane Renter Income Compared to Rental Unit Affordability, 2021

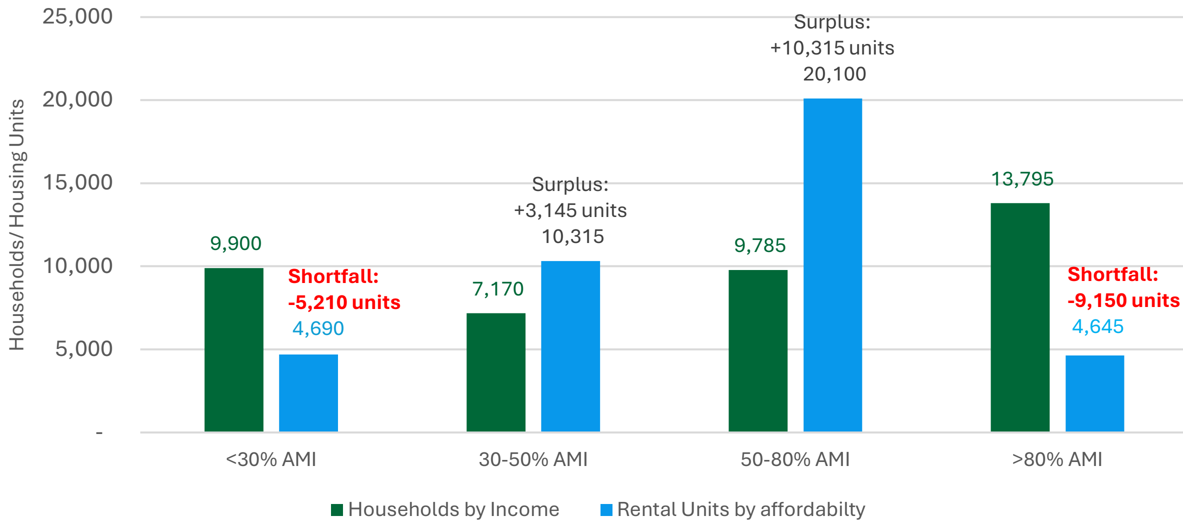


Source: City of Spokane; US HUD, 2017-2021 Comprehensive Housing Affordability Strategy (CHAS) (Table 8)

[76] Commerce, 2023a
[77] Each year, the U.S. Department of Housing and Urban Development (HUD) receives custom tabulations of American Community Survey (ACS) data from the U.S. Census Bureau. These data, known as the "CHAS" data (Comprehensive Housing Affordability Strategy), demonstrate the extent of housing problems and housing needs, particularly for low-income households.

In 2021, the difference between the number of extremely low-income households (< 30% AMI) and the number of rental units available and affordable at the price resulted in a shortfall of 5,210 units, meaning they had access to fewer housing options they could afford. Households earning moderate income and above (>80% AMI) also had fewer rental units available to them. See Figure 67

Figure 67. Spokane Renter Income and Rental Unit Availability, 2021



Sources: City of Spokane; US HUD, 2017-2021 Comprehensive Housing Affordability Strategy (CHAS) (Table 8), (Table 15C) & US HUD, 2017-2021 Comprehensive Housing Affordability Strategy (CHAS) (Table 14B). Note: +/- The difference between number of households in the income group and the number of rental units affordable to the income group.

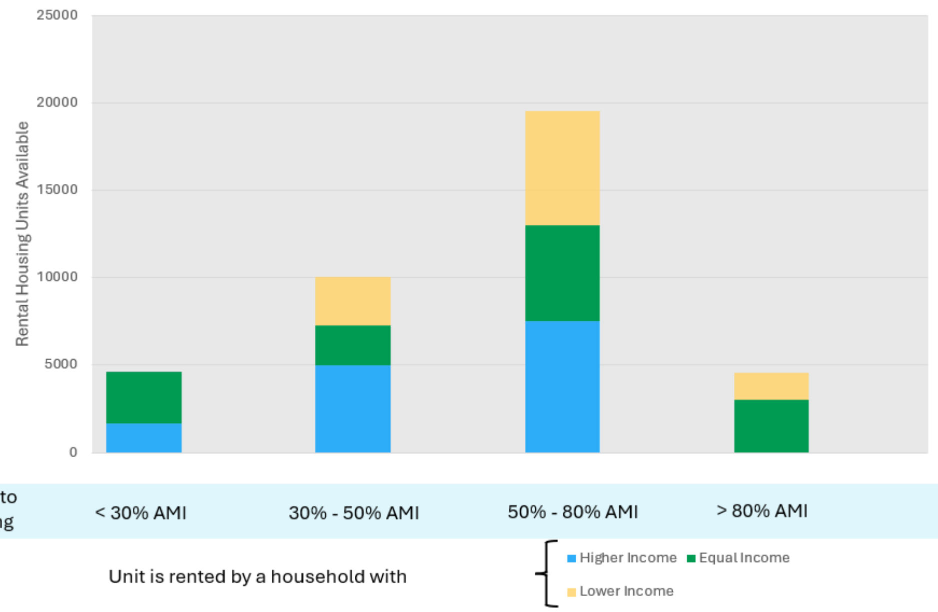
The difference in number of households at each affordability level and the number of units available to them suggests households are being forced to over-rent and under-rent. In Spokane:

Over-renting is when families are cost-burdened and pay more than 30% of their income on housing.

Under-renting is when households pay less than they can afford for rent, further reducing housing available to lower income households.

- About half of the units affordable to 30 – 50% AMI income households and about one third of units affordable to 50 – 80% AMI income households are rented by households with more income, meaning they are under-renting.
- About a quarter of the units affordable to 30 – 50% AMI income households and about one third of units affordable to 50 – 80% AMI income households are rented by households with less income, meaning they are spending more than 30% of their income on housing and are cost burdened.
- **The lack of units affordable to households making below 30% or above 80% AMI results in households over and under renting, reducing the number of units available to the renters in those affordability brackets.** See Figure 68

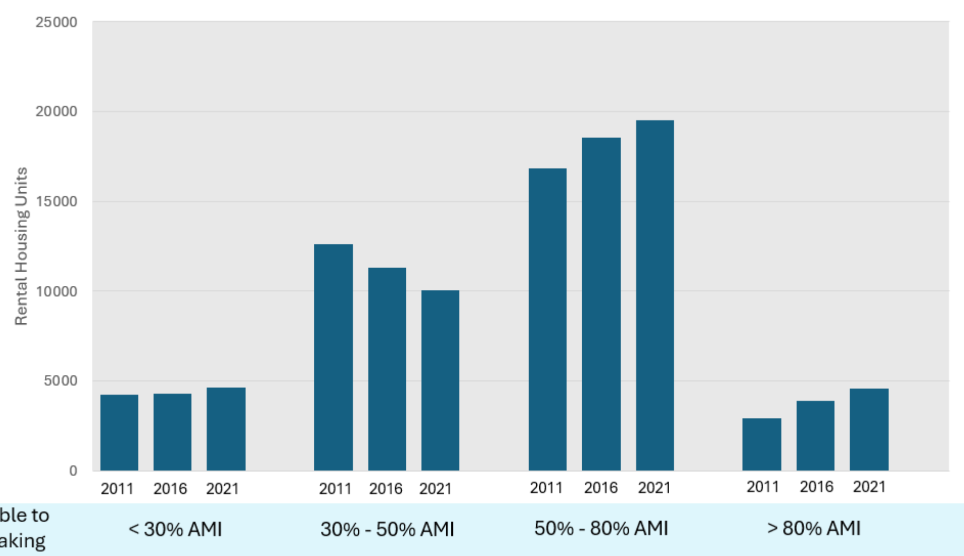
Figure 68. Rental Units by Affordability Level and Renter Income, 2017-2021



Sources: City of Spokane; US HUD, 2017-2021 Comprehensive Housing Affordability Strategy (CHAS) Table 15C

The proportion of households under and over renting remains generally consistent over time in Spokane. The more apparent change is the number of units affordable to each income band over time. The number of rental units affordable to households making 30%-50% AMI has decreased between 2011 and 2021 while it has increased for all other affordability levels. **This suggests that the City is making progress in meeting the needs of the higher income renters through new market-rate construction, but the progress is slower for lower-income housing, including the loss of units affordable to very low-income households.** See Figure 69

Figure 69. Rental Units Available by Affordability Level, 2011-2021

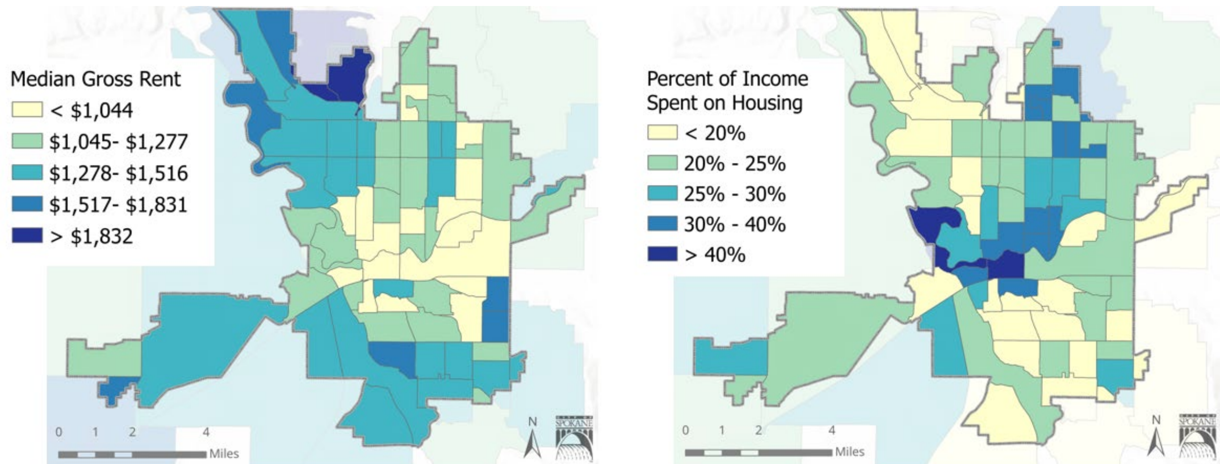


Sources: City of Spokane; US HUD, 2017-2021 Comprehensive Housing Affordability Strategy (CHAS) Table 15C

Rental Affordability

Looking at the geographic areas where residents are spending more of their income on housing could indicate places at risk for future displacement. While rental costs are highest on the South Hill and in Northwest Spokane, income is also generally higher in those areas. When looking at the percent of income spent on housing, median households in Central and Northeast Spokane spend a higher proportion of their income on housing than the remaining areas of the city and may be less likely to be able to adapt to displacement pressures. See Figure 70

Figure 70. Rental Housing Affordability, 2023



Sources: City of Spokane; US Census ACS Table B25031 Median Gross Rent (2023) and Table S2503 Financial Characteristics (2023)

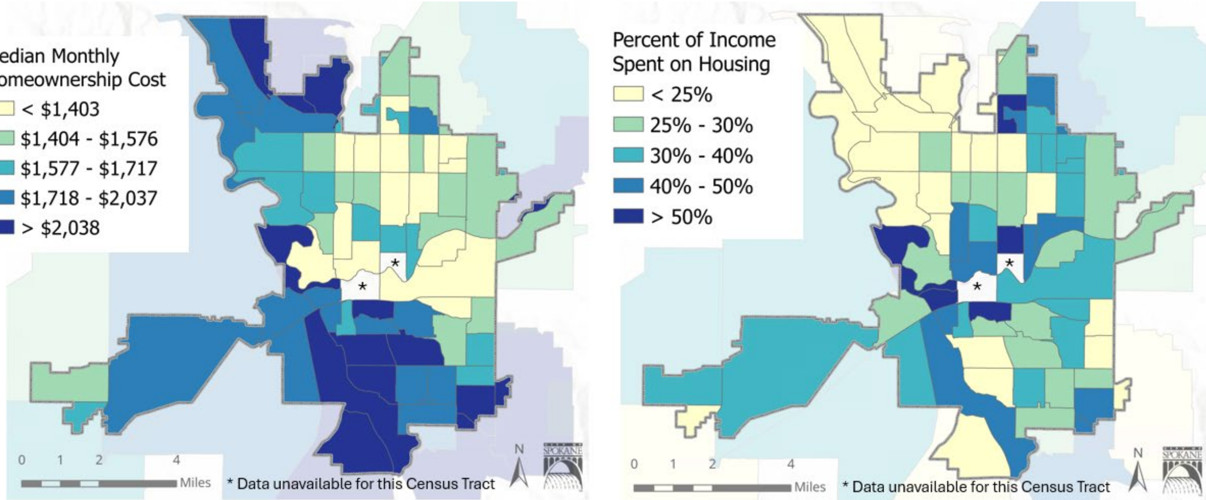
Homeownership Affordability

Monthly homeownership costs are generally higher than rental costs, and are highest in South Spokane, particularly in the Manito/Cannon Hill, Comstock, Rockwood, Latah/Hangman, and Southgate neighborhoods. There are also higher homeownership costs in Northwest Spokane on the edge of the city in North Indian Trail and 5 Mile Prairie neighborhoods. See Figure 71

There are some Census Tracts with higher homeownership costs that are adjacent to Tracts with lower homeownership costs, which can suggest proximity to a gentrifying area, patterns of historic investment or disinvestment, or other market pressures such as proximity to amenities like view corridors or barriers from topography, infrastructure, and environmental disparities.

When looking at percent of income spent on housing, some of the Census Tracts with higher homeownership costs have lower cost burden, suggesting higher incomes and the ability to afford higher costs in neighborhoods like Manito/Cannon Hill and Comstock. Conversely, there are some Census Tracts that have lower homeownership costs but are cost-burdened, suggesting households may be struggling to afford housing in neighborhoods in Northeast Spokane and Central Spokane. There are three Census Tracts that have both higher homeownership costs and are severely cost burdened which include portions of West Hills, East Central, Cliff-Cannon, and Shiloh Hills, suggesting higher risk for homeowner displacement and vulnerability.

Figure 71. Homeownership Affordability, 2023



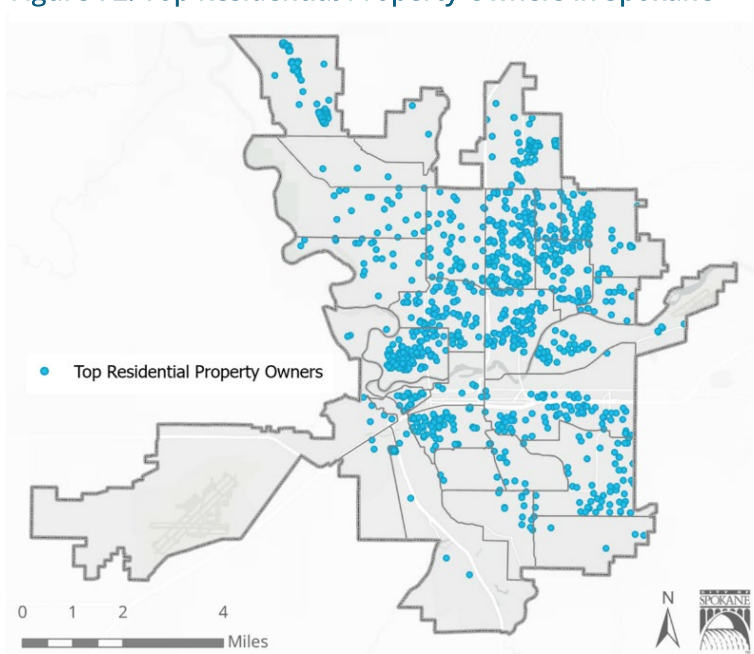
Source: City of Spokane; US Census ACS Table S2503 Financial Characteristics (2023)

Large-scale Property Owners

Large-scale corporate ownership of rental properties, especially by outside investors, has been linked to increased sale and rental prices due to the reduction in number of units available for homeownership opportunities and the ability of the corporate investors to influence the market through the scale of units they control. The top 23 rental property owners in Spokane own 1,230 properties, totaling more than 6,350 rental units, with high concentrations in North Indian Trail, Nevada Heights, West Central, East Central, and neighborhoods in the northeast as well as closer in central city.[78] **See Figure 72.**

Two-thirds of the rental units are single unit properties, with the remaining third are 2-4 unit and 5-plus unit properties. Nearly 10% of the properties have been built since 2018, with a larger majority built before 1960. The majority of the owners are categorized as large, local landlords.[79]

Figure 72. Top Residential Property Owners in Spokane



Source: City of Spokane; Spokane County Accessor; Tolemi, Top Residential Property Owners, 2025

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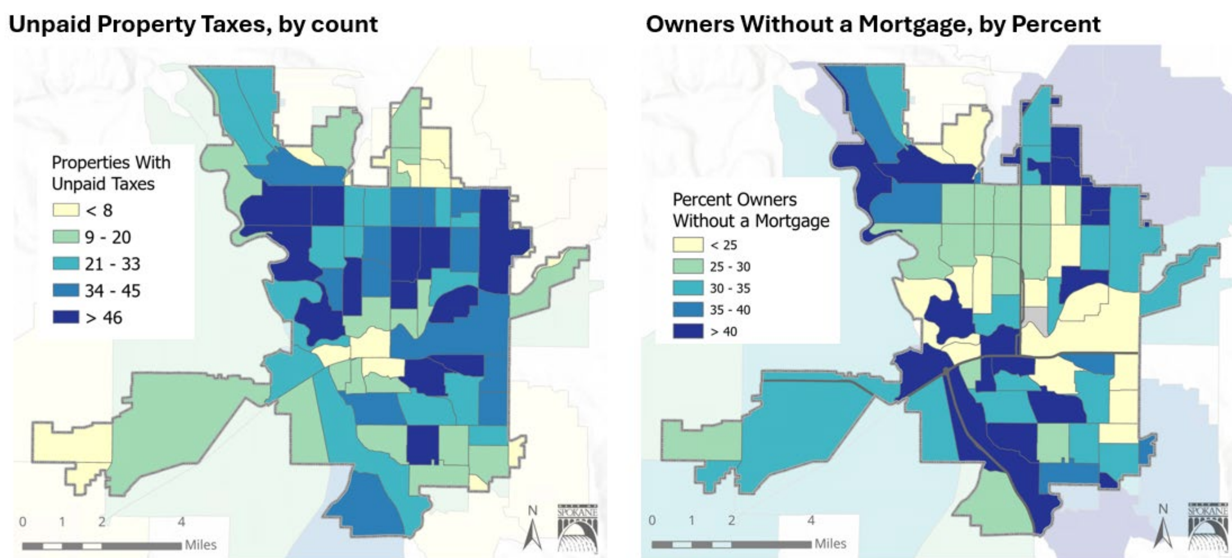
[78] City of Spokane, Spokane County Accessors Office
[79] City of Spokane, Code Enforcement

7.2 Unpaid Property Taxes

Unpaid taxes can also be an indicator of financial stress and lead to tax foreclosure after three consecutive years of non-payment. In Spokane, 2,188 parcels, roughly 3% of residential properties, have unpaid taxes that were due in 2023 or 2024 totaling over $4.73 million. **See Figure 73**

Homeowners who have paid off their mortgage may choose to defer their property tax up to two years without penalty which may skew the unpaid property tax results. For example, in North Spokane, Census Tracts south of Francis Avenue generally have lower homeowner rates and higher unpaid property taxes than Tracts on the South Hill or in North Indian Trail. This could mean that the areas with higher homeownership rates are taking advantage of the property tax deferral rather than not paying based on economic burden. If that is the case, North Spokane has a higher risk of tax foreclosure based on economic hardship than South Spokane and has a higher risk for future displacement.

Figure 73. Unpaid Property Taxes, 2025



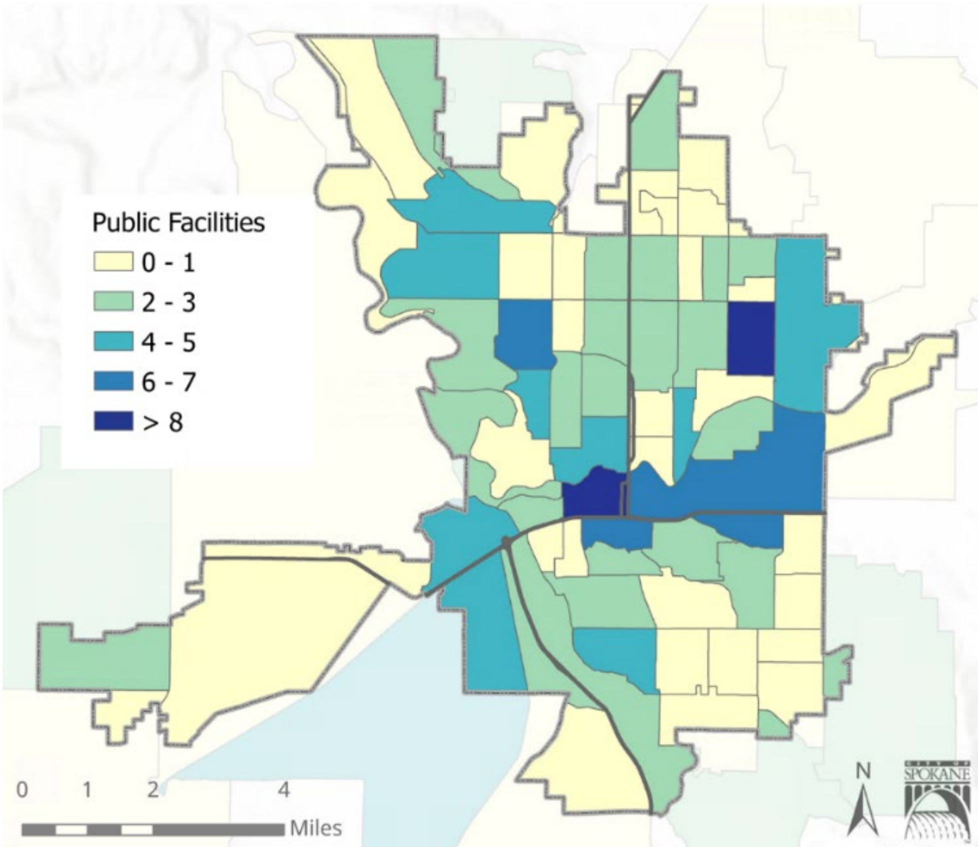
Sources: City of Spokane; Spokane County Accessors Office, 2025

7.3 Amenities and Infrastructure

Displacement risk can also be influenced by proximity to or presence of amenities, including access to parks, schools, community centers, libraries, and aquatic centers. These desirable amenities provide stability and quality of life, which can both help preserve neighborhoods and put pressure on existing residents if investments and desirability changes over time. Cumulatively, locations where multiple amenities are concentrated include downtown, Liberty Park, the Northeast Community Center, and Shadle Park. **See Figure 74**

Access to public transportation can also impact the desirability and access of neighborhoods with lasting impacts on displacement risk for existing residents. Some areas of the city have no current access to public transportation or infrequent service, while others have access to multiple routes with frequent service.

Figure 74. Presence of Public Facilities

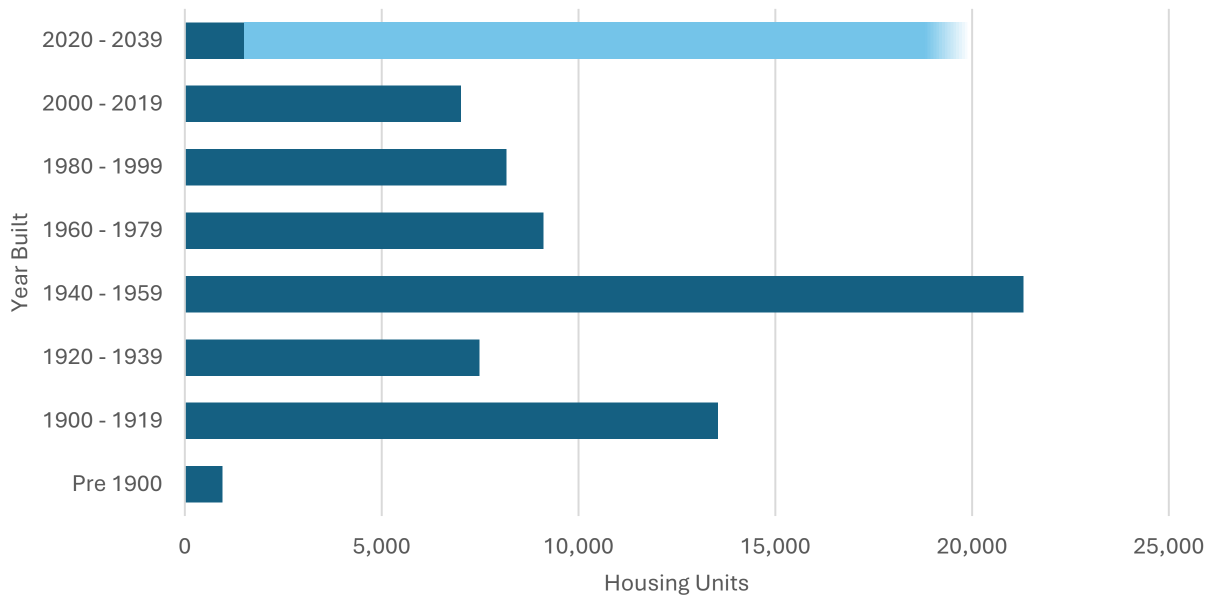


Source: City of Spokane, 2025

7.4 Housing Age and Quality

Housing age can provide indication of housing quality and condition. While older housing does not inherently mean poorer quality, it can mean additional maintenance costs for residents that could contribute to financial stress and eventually displacement. **In Spokane, 21% of the city's housing units are more than 100 years old, while more than 75% were built before 1980.** Close to half of housing units were built before 1960, the adoption date of modern building codes. See Figure 73

Figure 75. Spokane Housing Units by Year Built

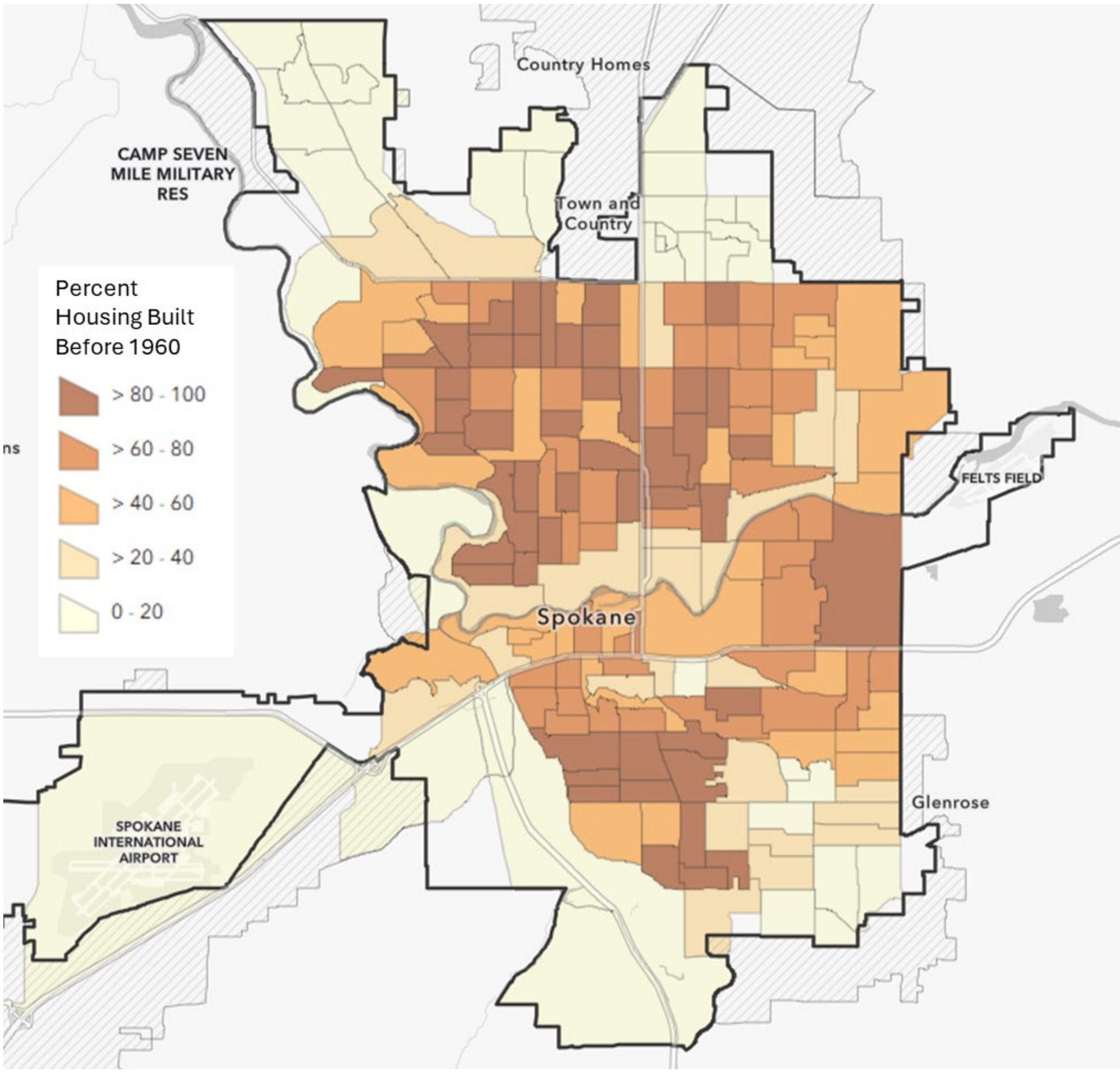


Source: City of Spokane; Spokane County Accessors Office, 2025. Note: Permits from 2020 – 2024 shown. Permitted units through 2040 projected based on 1,000 units a year, more conservative than current permitting.

Neighborhoods with older homes in Spokane do not always relate to poorer housing condition. Many of the older homes are in traditionally established single-family neighborhoods that developed in the early- to mid-1900s, have high rates of homeownership, higher household income, higher percentage of White, Not Hispanic or Latino population, and have quality of life amenities, like parks, high tree canopy coverage, and high performing schools. This is particularly present on the South Hill around Manito/Cannon Hill, Comstock, and Rockwood neighborhoods. **See Figure 76.**

Many of the areas with now older homes were not redlined but considered as most desirable on the HOLC maps and highlighted in the grade descriptions, which can be connected to higher investment and resources in these areas over time. **See Figure 77.** A similar pattern is also seen in pockets of West Central, Audubon/Downriver, Emerson/Garfield, and North Hill neighborhoods in North Spokane.

Figure 76. Housing Age before 1960



Source: Spokane Climate Vulnerability Index, 2025

Figure 77. HOLC Scan Area Description of A6, 1938

AVAILABILITY OF MORTGAGE FUNDS: a. Home purchase ample ; b. Home building ample

CLARIFYING REMARKS: Highly deed restricted and zoned single family residential. Lot values $12 to $20 per front foot. The rugged terrain lends itself to the effective landscaping and the beautiful gardens for which the area is noted. Also notable is the excellence of architectural design, construction, and maintenance. Many families of wealth and position have their homes in this area which is one of the best in the city and is accorded a "high green" grade.

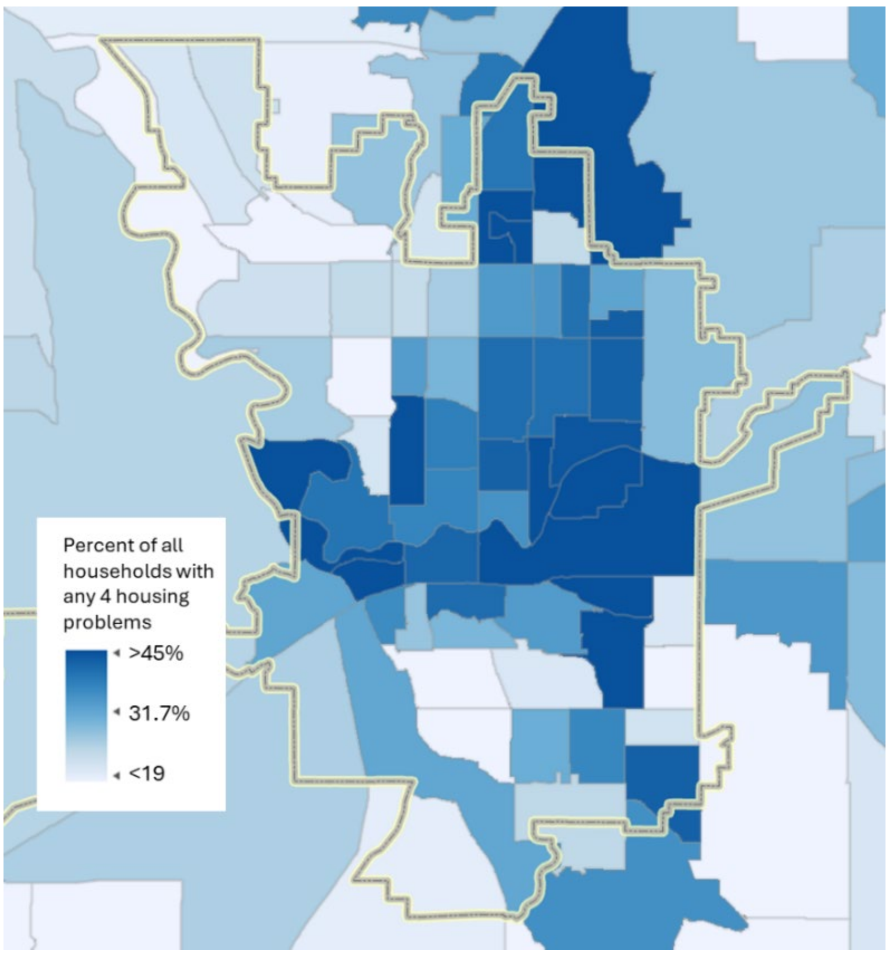
NAME AND LOCATION South Rockwood District, Spokane, W SECURITY GRADE A AREA NO. 6

Source: Mapping Inequality, University of Richmond

Housing quality can also be assessed by analyzing data identifying instances where "housing problems" exist. HUD provides information on housing problems that document the extent of housing problems and housing needs, particularly for low-income households, at the Census Tract level. The four housing problems are: incomplete kitchen facilities; incomplete plumbing facilities; more than 1 person per room; and cost burden greater than 30 percent.[80]

Higher percentage of households with any one of the four housing problems are found in East Central, West Central, the lower South Hill, and northeast including Chief Garry Park and Shiloh Hills. See Figure 78. These areas also have a higher population of people of color, lower income households, and other indicators that suggest a disparate impact in housing quality and ability to repair those housing problems without risk of displacement.

Figure 78. Households with Housing Problems



Source: HUD ACS 5 YR CHAS Estimate Data by Tract, 2016-2020

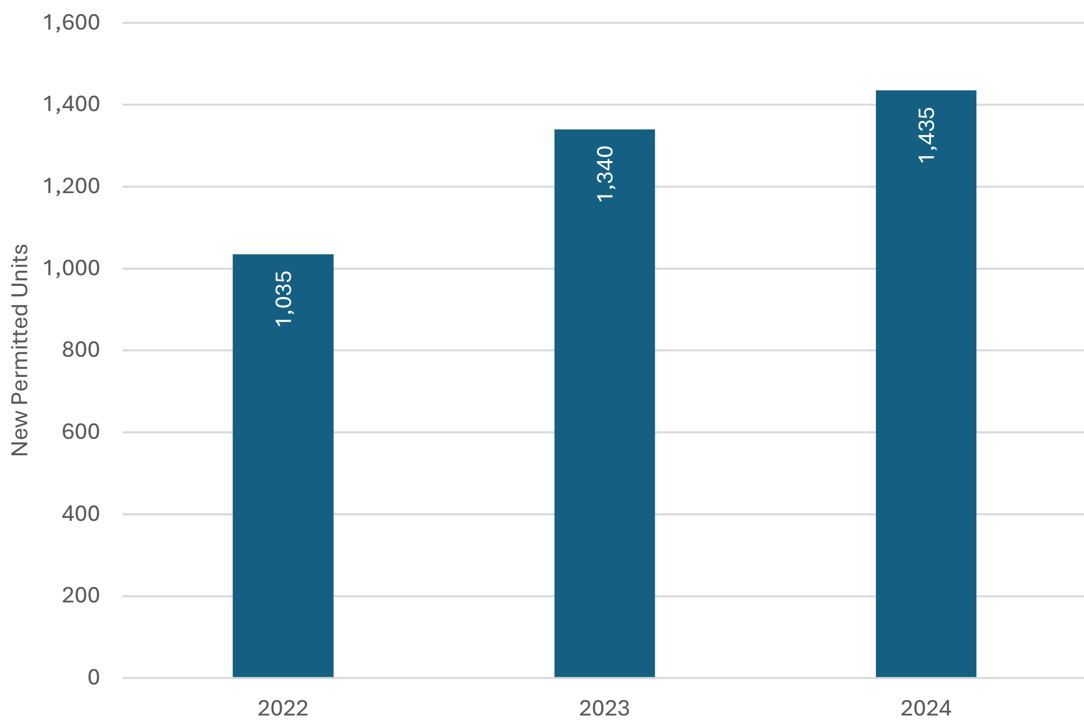
[80] Department of Housing and Urban Development (HUD). (2023). ACS 5 YR CHAS Estimate Data by Tract, 2016-2020. https://hudgis-hud.opendata.arcgis.com/datasets/HUD::acs-5yr-chas-estimate-data-by-tract/about

7.5 Development Pressure

New residential construction, especially in areas seeing a rise in residential speculation, can make areas less affordable for existing neighborhood residents. Since 2022, the City of Spokane has permitted more new housing units each year than the year before. See Figure 79. The highest concentration of new housing units permitted between 2022 and 2024 is in the East Central, Shiloh Hills, and Cliff-Cannon neighborhoods. See Figure 80

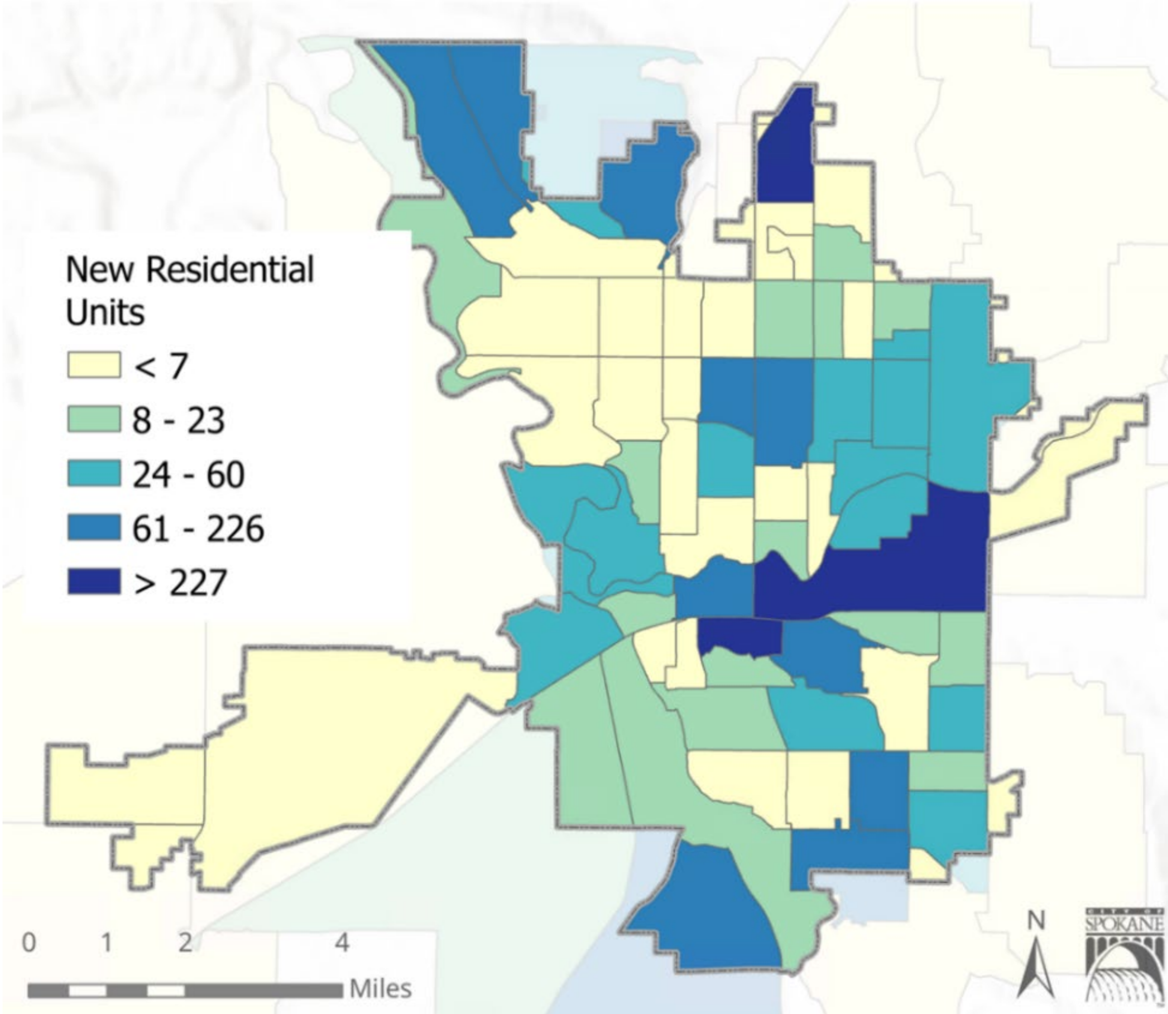
Redevelopment can also be a driver of displacement through the direct loss of units through demolition. Though there may be a net increase in housing units, in the short term, these units are generally less affordable than the units they are replacing, limiting a resident's ability to remain in their neighborhood. Under the City's most recent comprehensive plan and adopted zoning with changes made in 2024, additional development capacity exists throughout Spokane, especially in the central, southwest, and northeast areas.

Figure 79. New Housing Units Permitted, 2022-2024



Source: City of Spokane DSC, 2022-2024

Figure 80. New Residential Units, 2022-2024



Source: City of Spokane DSC, 2022-2024

7.6 Displacement Risk Assessment

The displacement risk assessment identifies if a specific population in a specific area is currently being, or is under elevated risk of being, forced out of the area based on factors outside of their control.[81] Displacement risk was last mapped for the city of Spokane as part of the Housing Action Plan, adopted by City Council in 2021.[82]

A displacement risk assessment includes a combination of measures that can be categorized into groups:

- **Sociodemographic measures** include variables that are associated with a higher risk of displacement such as households that rent their housing, have household incomes lower than other households in the area, are BIPOC, speak a language other than English or have lower educational attainment than adjacent areas. These factors are associated with greater housing vulnerability and structural barriers that decrease their ability to find and access replacement housing in the neighborhood should they be forced from their current housing.
- **Sociodemographic change measures** assess whether the pattern of change in the demographic profile of a neighborhood is diverging from the pattern of change in the jurisdiction.
- **Market change measures** include variables of housing cost and housing cost change in the area, typically compared to a larger market reference of the jurisdiction or the region. These may include some observations of whether the area was previously a low or high-cost area. Risings costs in previously low-cost areas suggest a higher displacement risk than rising costs in previously high-cost areas.
- **Proximity or presence of amenity measures** often include access to transit, parks, schools, libraries, and community centers. Change in the presence of amenities, particularly transit services, are regarded as predictive of increased displacement pressure.

Displacement risk analysis typically includes a map showing areas of higher risk of displacement. Measures to identify higher risk of displacement also includes a combination of inputs: **community engagement** with residents, developers, community-based organizations, housing agencies and other parties that would have knowledge of displacement; and **staff knowledge** of areas that have experienced redevelopment/displacement or how a change in zoning or regulations could influence the development feasibility of the area.

Commerce has provided a baseline statewide map of displacement risk at the Census tract level to support jurisdictions in meeting the new requirements of the housing element.[83] Displacement risk for this assessment builds off this work by integrating the following data factors:

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[81] Commerce, 2023a

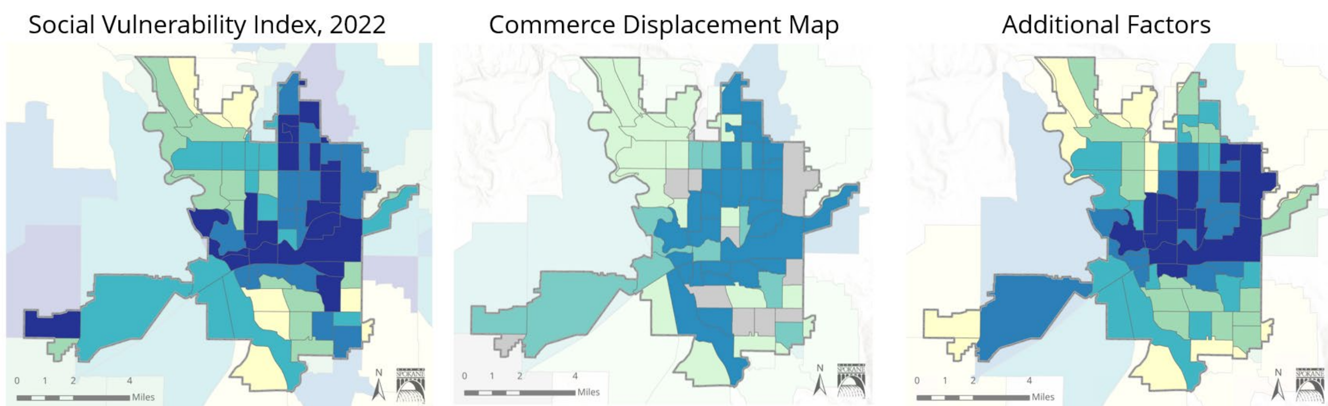
[82] City of Spokane. (2021). *Spokane Housing Action Plan.* https://my.spokanecity.org/housing/spokane-housing-action-plan/

[83] Washington State Department of Commerce. (2023b). *Draft Displacement Risk Map.* https://experience.arcgis.com/experience/d26f4383cab3411cb45f39ddfc666b74/?data_id=83713d4b3ea34743bed49d3d61be4fb3-187dd75e9f2-layer-27-187dcfb6357-layer-4%3A499

- **WA Department of Commerce's Statewide Displacement Risk Map.** This displacement risk analysis is modeled on the work of researcher and Portland State University Professor Lisa K. Bates (2013), which focuses on three factors to determine displacement risk based on demographic and market change: the social vulnerability of the residential population, evidence of demographic change, and market conditions (Bates, 2013).[84]
- **Center for Disease Control's (CDC) Social Vulnerability Index (SVI), 2022.** The CDC SVI provides vulnerability index values for all census tracts in the United States. The service includes an interactive map and ability to download the SVI scores across four dimensions of vulnerability: socioeconomic, household composition and disability, minority status and language, and housing type and transportation.[85]
- **Additional Housing and Market Factors.** Additional factors that may impact displacement risk, but are not found within the previous data sets, include concentration of existing displacement, affordability, public infrastructure, and anticipated future development.

Each map input outlined provided a set of indicators which contribute to displacement risk. They were each weighted equally to create an overall index of displacement risk in Spokane. Census Tracts with unknown risk in the Commerce map were evaluated only on the remaining indicators. For those Tracts, the Commerce map was not used to develop the index score. See Figure 81

Figure 81. Displacement Risk Assessment Inputs



Source: City of Spokane; CDC Social Vulnerability Index, 2022; Department of Commerce Displacement Risk Map, 2023

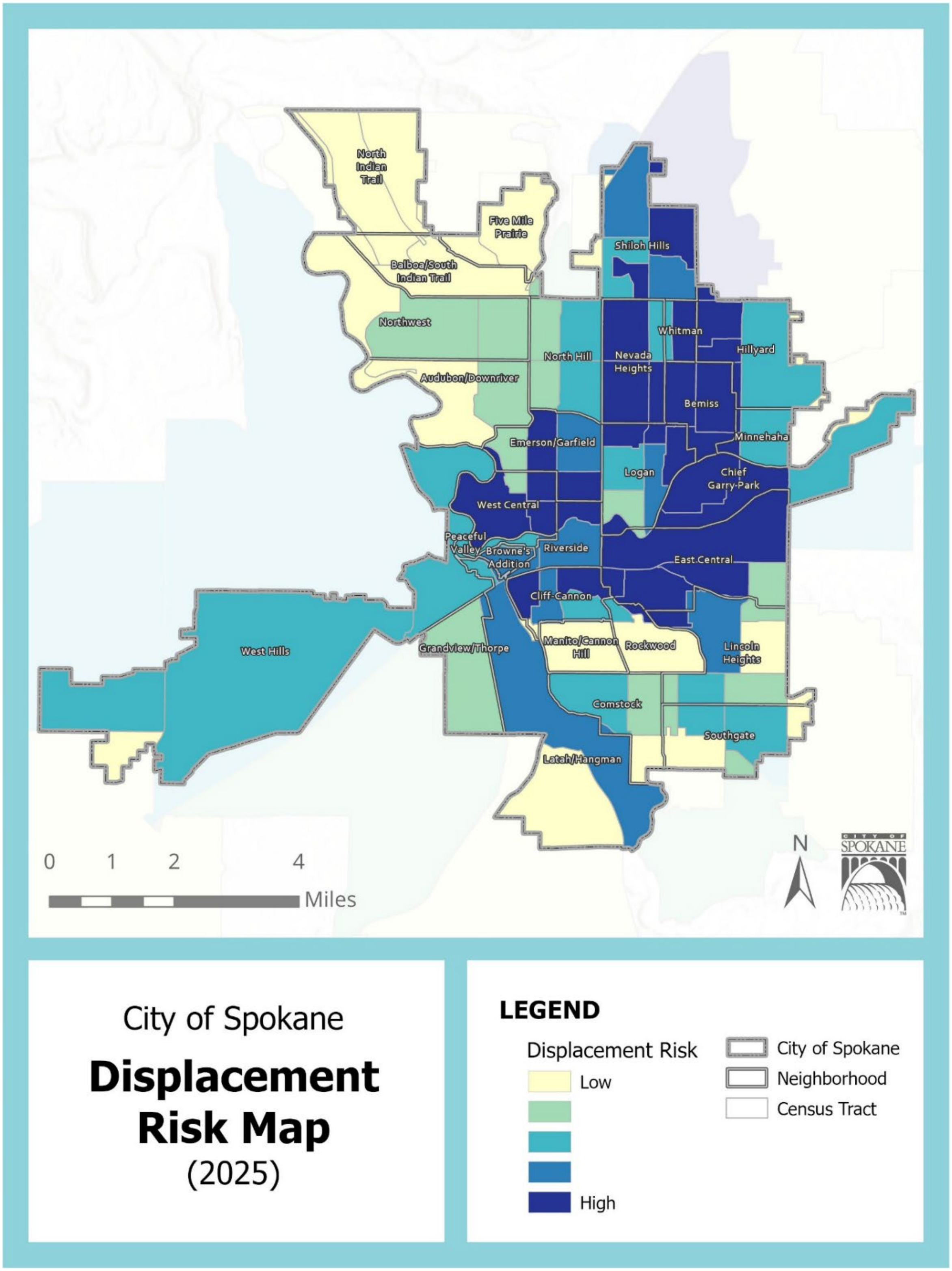
When combined into a single displacement risk assessment, all indicators point toward a higher displacement risk in Central and Northeast Spokane, with some variation. See Figure 82 for Displacement Risk Map.

[84] Bates, L. K. (2013). *Gentrification and Displacement Study: implementing an equitable inclusive development strategy in the context of gentrification.* Commissioned by the City of Portland, Bureau of Planning and Sustainability.

[85] Centers for Disease Control (CDC). *CDC/ATSDR Social Vulnerability Index (SVI).* [2022] Database [Washington]. https://www.atsdr.cdc.gov/place-health/php/svi/index.html. Accessed 2025.

7.6.1 Displacement Risk Map

Figure 82. Displacement Risk Map, 2025



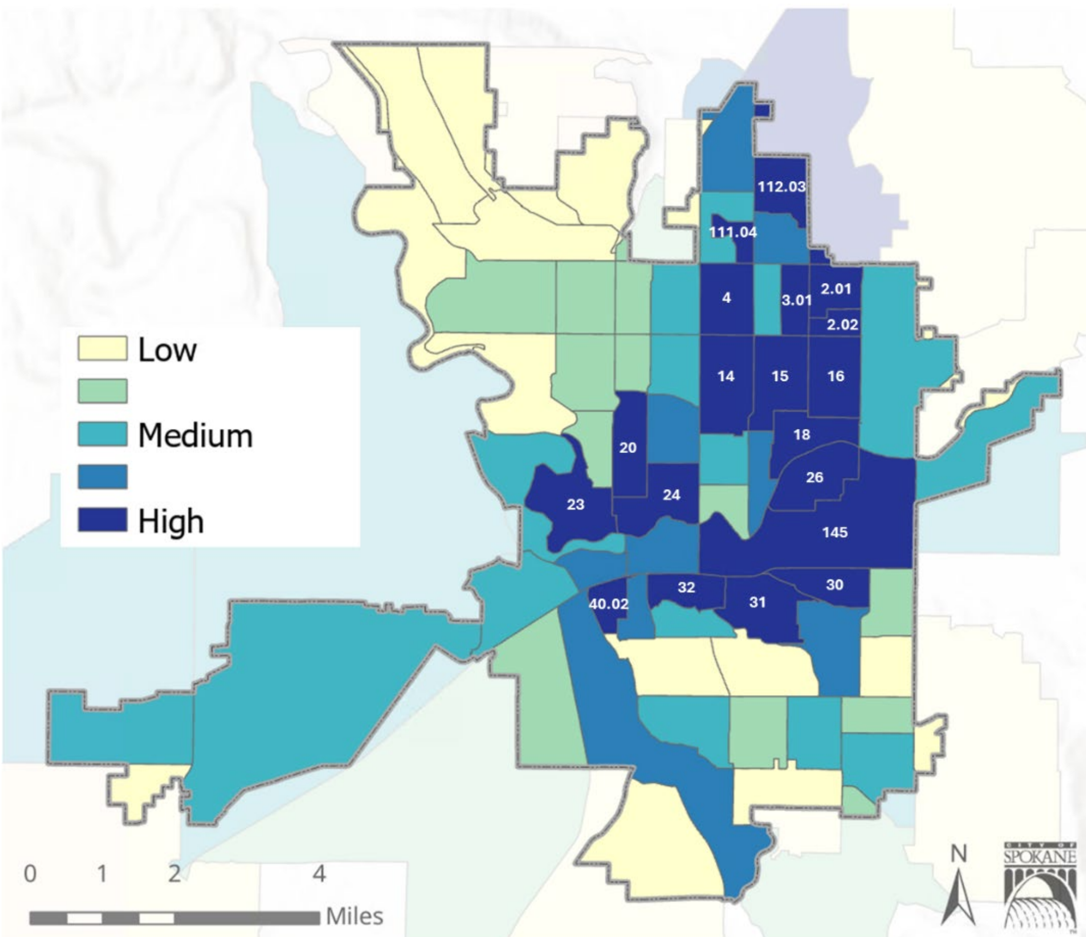
Highest Displacement Risk Census Tracts

For the highest displacement risk Census Tracts in Spokane, an average of 25.6% of the population is BIPOC, which is higher than the city level of 21.5%. **See Figure 83.** The highest displacement risk Census Tracts have:

- 12 of 19 Census tracts (63%) have higher BIPOC populations and similar or lower White, Not Hispanic populations than the city level
- 18 of 19 Census tracts (95%) have a median household income lower than the city level
- 16 of 19 Census tracts (84%) have higher poverty rate than the city level
- 11 of 19 Census tracts (58%) had a higher percentage of population that had a different residence one year ago than the city level
- 14 of 19 Census tracts (73%) have a higher percentage of renter households than the city level
- 5 of 19 Census tracts (26%) have a higher percentage of homeowners than the city level

Table 6 features demographics and socioeconomics from the Census tracks ranked by the highest risk for displacement.

Figure 83. Highest Risk Displacement Census Tracts



Source: City of Spokane, 2025

Table 6. Highest Displacement Risk Census Tracts Socioeconomics

Lower than City Level	Similar or higher than City level

Census Tract	White, Not Hispanic or Latino	BIPOC	Median Household Income	Poverty Rate	Different Residence 1 Year Ago	Owner Occupied	Renter Occupied
145	74.2%	25.8%	$44,655	33.5%	23.3%	28.8%	71.2%
20	78.6%	21.4%	$41,250	30.3%	14.7%	48.6%	51.4%
24	72.9%	27.1%	$37,903	39.5%	38.1%	14.7%	85.3%
16	72.9%	27.1%	$48,424	27.7%	11.9%	50.2%	49.8%
4	73.2%	26.8%	$65,661	12.3%	18.9%	45.3%	54.7%
30	66.9%	33.1%	$53,686	25.7%	16.0%	66.4%	33.6%
18	81.8%	18.2%	$39,263	24.2%	18.2%	45.1%	54.9%
2.02	72.7%	27.3%	$41,071	36.0%	28.9%	42.6%	57.4%
26	64.4%	35.6%	$58,692	14.6%	12.9%	54.6%	45.4%
112.03	79.6%	20.4%	$38,844	22.8%	11.8%	27.4%	72.6%
14	73.6%	26.4%	$56,641	21.3%	22.9%	58.1%	41.9%
23	71.5%	28.5%	$54,458	20.8%	15.6%	66.6%	33.4%
3.01	67.8%	32.2%	$49,493	11.6%	14.4%	74.2%	25.8%
32	83.7%	16.3%	$51,591	21.6%	34.3%	28.3%	71.7%
2.01	78.6%	21.4%	$45,083	14.1%	15.2%	66.8%	33.2%
111.04	65.1%	34.9%	$48,750	29.7%	26.8%	20.2%	79.8%
15	85.0%	15.0%	$63,651	18.9%	22.5%	69.5%	30.5%
31	83.6%	16.4%	$73,097	22.5%	24.6%	49.2%	50.8%
40.02	66.9%	33.1%	$45,690	25.4%	28.8%	27.9%	72.1%
Average	*74.8%*	*25.2%*	*$48,750 (Median)*	*23.7%*	*20.6%*	*47.6%*	*52.4%*
Spokane	**78.5%**	**21.5%**	**$65,745**	**14.6%**	**18.2%**	**58.3%**	**41.7%**

Source: City of Spokane; U.S. Census Bureau, ACS 5-Year Estimates, 2019-2023

8. Policy Evaluation

8.1 Housing Element Policy Evaluation

To ensure existing policies no longer exacerbate disparate impacts, WA Commerce provides guidance on how to evaluate policies for racially disparate impacts. **Following the guidance, once jurisdictions have identified if there is evidence of racially disparate impacts, displacement, and exclusion in housing, the next step is to review goals, policies, and regulations to assess whether policies contribute to those impacts.**

The first lens for policy evaluation focuses on actions the policies support or prohibit, using the questions below for consideration. The second lens focuses on the narrative effect of the policy and whether it furthers harmful biases about groups of people and communities. Racial bias is a predisposition for or against based on unconscious associations about people based on race, whether intentional or unintentional. Jurisdictions are expected to review each goal and policy in the existing Housing Element for terminology that encodes bias, racially informed presumptions or phrases that promote exclusion.

Questions for Consideration:

- Is the policy effective in accommodating needed housing?
- Does the policy contribute to racially disparate impacts? Displacement? Exclusion in housing?
- Who benefits and who is burdened by the policy?
- Does the policy increase displacement risk? If so, can this be mitigated through policies or actions?
- Does the policy provide vulnerable communities protection from displacement?
- Does existing terminology encode bias, racially informed presumptions or phrases that promote exclusion?

Evaluation Criteria

RDI Criteria	Evaluation	Code
The policy is valid and supports meeting the identified housing needs. The policy is needed and addresses identified racially disparate impacts, displacement and exclusion in housing.	Supportive	S
The policy can support meeting the identified housing needs but may be insufficient or does not address racially disparate impacts, displacement and exclusion in housing.	Approaching	A
The policy may challenge the jurisdiction's ability to meet the identified housing needs. The policy's benefits and burdens should be reviewed to optimize the ability to meet the policy's objectives while improving the equitable distribution of benefits and burdens imposed by the policy.	Challenging	C
The policy does not impact the jurisdiction's ability to meet the identified housing needs and has no influence or impact on racially disparate impacts, displacement or exclusion.	Not Applicable	NA

Housing Element Policy Evaluation

Policy	**Discussion**	**RDI Criteria**	**Analysis**
Policy from the Comprehensive Plan as of Sept 2025	*Discussion underneath policy in the Comprehensive Plan. This is not the policy but adds context to understand intent.*	*Criteria for advancing RDI*	*Draft staff analysis for consideration of policy intent, outcomes, focus, and relevancy.*
H 1 HOUSING CHOICE AND DIVERSITY Goal: Provide opportunities for a variety of housing types that is safe and affordable for all income levels to meet the diverse housing needs of current and future residents.			
H 1.1 Regional Coordination Coordinate the city's comprehensive planning with other jurisdictions in the region to address housing-related needs and issues.	Discussion: It is critical to maximize the effectiveness of scarce public resources in improving housing opportunities throughout the region with coordination and management programs across jurisdictional boundaries.	A	Policy supports regional coordination to efficiently address housing needs, which is supportive of providing housing opportunities to all residents. However, the policy could focus more directly on addressing housing needs, leaving coordination as a tool, but not the focus of the policy itself.
H 1.2 Regional Fair Share Housing Participate in a process that monitors and adjusts the distribution of low income housing throughout the region.	Discussion: An issue within the greater Spokane region is the distribution of affordable housing for all income groups. Areas that continue to accommodate large shares of the low-income housing market have higher demands to satisfy social health and service needs. A regional process that periodically monitors progress toward achieving the region's housing goals and makes adjustments to policy, programs, and land use plans helps bring about the desired distribution of housing cost diversity.	C	Policy supports regional coordination of provision of low-income housing, which supports housing options where people might want to live. While the Discussion text is meant to clarify the need for other jurisdictions, *in addition to* the City of Spokane, to provide adequate affordable housing, the language could be misinterpreted as challenging the requirement to provide low-income housing as too costly.
H 1.3 Housing Employer-Sponsored Provide incentives	Discussion: Housing should be available near employment areas in order to provide transportation options, to increase	A	Policy supports reducing commute burden by developing affordable housing close to jobs and referencing in the discussion those most impacted by commute burden.

for employers to sponsor or develop affordable housing in proximity to their place of employment.	accessibility to employment for those most in need and least able to afford personal vehicle transportation, and to create shorter trips.		It does not specifically refer to low-income or marginalized groups, leaving intent of benefits uncertain. Could include language about prioritizing historically marginalized areas and integrating anti-displacement mitigation measures to protect current housing stock affordability and prevent increased housing costs. Could be further be paired with affordability criteria and stronger incentives direction to provide more policy direction.
H 1.4 **Use of Existing Infrastructure** Direct new residential development into areas where community and human public services and facilities are available.	Discussion: Using existing services and infrastructure often reduces the cost of creating new housing. New construction that takes advantage of existing services and infrastructure conserves public resources that can then be redirected to other needs such as adding amenities to these projects.	A	Policy supports making housing development more affordable by focusing development on infill and where infrastructure and services (schools, transit, healthcare) already exist. Could potentially increase displacement if already well-serviced areas are higher in cost and have desirable amenities, as these areas historically have been less accessible to racial groups and lower income households. Anti-displacement measures should be considered to preserve residents in well-serviced areas while also protecting residents in areas that receive new infrastructure upgrades. Policy could also clarify the City's commitment to equitable distribution of services citywide.
H 1.5 **Housing Information** Participate in and promote the development of educational resources and programs that assist low and moderate-income households in obtaining	Discussion: A lack of financial literacy or how to obtain housing and home financing is often an impediment to finding and maintaining suitable housing. A place such as a resource center where financing assistance is available and home purchasing techniques are taught can help households find suitable housing.	S	Policy supports educational resources to raise awareness and increase access to important housing information for historically marginalized communities. Could be made stronger by including additional focus on culturally relevant education, partnerships with community-based organizations serving BIPOC communities, and translation of materials. May help reduce displacement risk by supporting housing access and stability.

affordable and suitable housing.			
H 1.6 **Fair Housing** Promote compliance with fair housing laws.	Discussion: Provide information to the general public about their rights and obligations under the fair housing laws and the grievance procedures available in case of violation. The city should document and forward violations of state and federal civil rights laws related to housing to the appropriate authorities.	S	Policy recognizes fair housing in housing, which is rooted in anti-discrimination and removing barriers to housing. This helps reduce racially disparate impacts and exclusion by protecting protected classes from discriminatory housing practices. Could be made stronger by changing "promote" language to focus on requirements, identifying anti-discrimination measures, and integrating specific policies from the Fair Housing Plan into the Comprehensive Plan, particularly policies addressing BIPOC households and income levels most impacted by fair housing issues. Also, the creation of the Office of Civil Rights, Equity, and Inclusion in 2023 and the Human Rights Commission helps track civil rights violations for reporting. Mention of these kinds of bodies in the policy, as sources for promoting these ideals, could strengthen the policy.
H 1.7 **Socioeconomic Integration** Promote socioeconomic integration throughout the city.	Discussion: Socioeconomic integration includes people of all races, color, religion, sex, national origin, handicap, disability, economic status, familial status, age, sexual orientation, or other arbitrary factors. Often, housing affordability acts as a barrier to integration of all socioeconomic groups throughout the community.	S	Policy supports socioeconomic integration of different economic backgrounds throughout the city. Should increase access for low-income households to higher opportunity areas to expand housing choice and options. The language is vague overall and could be more direct in language around diversity, equity, and affordability by including language from the Discussion into the policy. Could also include language about access and opportunity. Similar to H 1.9 so could be revised and combined.
H 1.8 **Affordable Housing Requirement**	Discussion: Requiring that affordable housing be incorporated in every new housing development helps	S	Policy directs affordable housing be integrated into all new developments, and the Discussion references reversing economic

Include a percentage of affordable housing within all new developments that include housing.	reverse the economic segregation trends within the city. This has the positive effect of integrating households of varying incomes. Housing types such as smaller homes on smaller lots or townhouse structures should be allowed to accommodate this requirement. This housing should be priced so that it is available to households that earn up to eighty percent of the countywide median household income.		segregation. Reduces exclusion by ensuring affordable housing is part of new developments in various neighborhoods, identifying an AMI target. Could be made stronger to include language addressing racial segregation as well. Mandating affordable housing into developments would further create mixed income housing, not singling out affordable development only but supporting integration to give people of all income levels more choices.
H 1.9 Mixed-Income Housing Encourage mixed-income developments throughout the city.	Discussion: Mixed-income housing provides housing for people with a broad range of incomes on the same site, development, or immediate neighborhood. Mixed-income housing provides socio-economic diversity that enhances community stability and ensures that low-income households are not isolated in concentrations of poverty.	S	Policy supports integration of different economic backgrounds and diversity throughout the city and addresses the need for community stability in the Discussion. Could be made stronger by adding some Discussion language into the policy language to be more direct about diversity and focusing on historically disenfranchised neighborhoods to overcome socioeconomic isolation and loss of community wealth building, particularly when paired with anti-displacement measures. Similar to H 1.7 so could be revised and combined. In discussing mixed-income housing, focus on moderate income housing could help broaden to include workforce housing, which can help increase housing options and support the stability of mixed-income housing.
H 1.10 Lower-Income Housing Development Incentives Support and assist the public and private sectors to	Discussion: When addressing the housing needs of lower-income households, public funding, incentive programs, and technical help may be needed in order for housing development projects to be successful. Local incentives	A	Policy is focused on developing lower income housing for households not typically supported in the market, which when implemented can directly increase the supply of subsidized and lower-income housing and address gaps where market-rate housing is unaffordable. This supports low-

develop lower-income or subsidized housing for households that cannot compete in the market for housing by using federal, state, and local aid.	to lower or subsidize the cost of developing new housing may include density bonuses, fee exemptions, priority permit processing, property tax deferral, increased options in housing types, and inclusionary zoning requirements.		income households, which also supports opportunities for lower income BIPOC households to access housing with more options and programmatic support. There is a growing gap in supporting development for moderate income households at the 80-120% AMI, so this could be recognized further or be focused on in a separate policy. Funding is going to the developer and housing providers, so additional policy focus could be on supporting residents with rental assistance and other programs that benefit residents directly.
H 1.11 Access to Transportation Encourage housing that provides easy access to public transit and other efficient modes of transportation.	Discussion: Transportation is the second largest expenditure after housing and can range from 10 to 25 percent of household expenditures. Examining where housing is located and the associated transportation costs may provide a more realistic evaluation of housing affordability in the future.	A	Policy addresses high cost of transportation on households and promotes reducing commute burden. This is supportive of nearly all households in the city, but particularly lower income and renter households which have higher rates of cost burden. Could contribute to displacement in transit-rich areas due to rising demand, access to services, and desirably, particularly if housing affordability is not preserved. Should clarify inclusion of all income levels and accessibility needs or emphasis on providing benefits to historically marginalized communities or areas with historic disinvestment to avoid exclusion.
H 1.12 Affordable Housing Funding Sources Support the development of affordable housing development funding sources.	Discussion: Lower-income housing development funding sources may include but are not limited to a community land trust, trust fund, mortgage revenue bonds, levies, or low-income housing tax credits.	A	Policy is supportive of affordable housing and addressing ways to identify funding through different housing models. The Discussion includes many policy solutions that could be fleshed out further to give better direction in the comprehensive plan for what the city will prioritize. Additionally, the relationship between this policy and H 1.10 should be better understood and refined, as they call for similar action on the part of the City and

			others. Affordable housing typically focusing on low income may create gaps for moderate income households that typically don't qualify for supportive funding. As housing prices rise, the need to support moderate income households is also growing. This could be included here or developed in another policy.
H 1.13 Siting of Subsidized Low-Income Housing Set clear site selection criteria for publicly subsidized housing to minimize geographic concentrations of publicly subsidized housing projects in neighborhoods with a high percent of minority or low-income households.		A	Policy acknowledges consideration of siting publicly subsidized housing to help integrate neighborhoods. Providing subsidized housing in higher income areas in addition to supporting housing options in lower income areas provides the most options for households to find housing that fits their needs. Policy could be enhanced by being more direct at integrating affordable housing that supports low income as well as moderate income into higher income neighborhoods while also acknowledging the historic practices of redlining and racially restrictive covenants that limited housing options for BIPOC and low-income households and segregating higher income, White neighborhoods. Site selection criteria should integrate RDI analysis to ensure impacts are addressed.
H 1.14 Building, Fire, Infrastructure, and Land Use Standards Review periodically and, when needed, revise building, fire, infrastructure, and land use standards and requirements to	Discussion: City standards need to be reviewed periodically to ensure that they are efficient, cost effective, reflect current technology, and maintain the goal of affordable housing.	A	Policy has the potential to address displacement risk by keeping housing affordable. Need to clarify "community standards" so that it is not discriminating against racial groups that may be different from dominant culture.

ensure community standards are implemented and that new or rehabilitated housing remains affordable.			
H 1.15 Performance Standards Create a flexible project review process that allows for the use of alternative standards, but only if their use results in a project that is equal or superior to using existing standards.	Discussion: Often several ways of achieving a standard exist. Health and safety concerns must be preserved but flexibility in how to achieve the desired standard is needed. A review process should be available to address a proposed development practice that is different from the existing development standards. When the proposed development practice is demonstrated to achieve the same ends as those prescribed in the existing development standards, the procedure should be approved. Different methods should be allowed when the results of the development practice achieve identical results in comparison to the prescribed standards. In many cases, allowing alternative development methods to be used can reduce development costs.	NA	As currently worded, this policy concerns itself with development standards and design requirements for housing. While these topics are important, they have less direct impact on BIPOC residents. The topic here is not where housing is constructed or how much, thus it's impact on RDI and Displacement topics is limited. That said, flexibility in standards can extend to topics of RDI and Displacement concern, thus this policy is worth mentioning.
H 1.16 New Manufactured Housing Permit manufactured homes on individual lots in all areas where	Discussion: Courts have ruled against discriminatory ordinances which restrict the location of Uniform Building Code compliant manufactured housing. Manufactured housing cannot be regulated	S	Policy supports manufactured homes in all residential areas, which can help lower the barrier to entry for lower-income households and increase housing options for all. Could be made stronger include focus on mobile home preservation and consideration of community-owned models so residents are able

residential uses are allowed.	differently than on-site built housing.		to build equity and ownership. It is worth considering a policy calling for updated manufactured home standards in Spokane that allow for a greater amount of diversity in type, construction, and location. Currently, the City limits manufactured housing to double-wide housing, excluding many modern types that might lower barriers to homeownership for all parts of the community.
H 1.17 Partnerships to Increase Housing Opportunities Create partnerships with public and private lending institutions to find solutions that increase opportunities and reduce financial barriers for builders and consumers of affordable and lower-income housing.		S	Policy supports affordable housing partnerships to increase housing opportunities. No solutions identified, so could give better direction on how to increase opportunities and reduce financial burdens. Could be further enhanced to support partnerships with BIPOC organizations and support workforce development and training to build up more BIPOC individuals in the development, construction, real estate, finance, and other private sectors. Again, consideration of moderate income housing for homeownership opportunities to address a growing gap in supportive policies and funding sources.
H 1.18 Distribution of Housing Options Promote a wide range of housing types and housing diversity to meet the needs of the diverse population and ensure that this housing is available throughout the community for people of all	Discussion: A variety of housing types should be available in each neighborhood. Diversity includes styles, types, size, and cost of housing. Many different housing forms can exist in an area and still exhibit an aesthetic continuity. Development of a diversity of housing must take into account the context of the area and should result in an improvement to the existing surrounding neighborhood.	S	Policy supports housing options in every neighborhood, which promotes integration of housing types and can ultimately support integration of people. Includes reference to diversity and could be made stronger to promote housing opportunities that meet the needs of communities of color, different cultural backgrounds, and accessibility. Language should be included from discussion to bolster emphasis on all neighborhoods. Updating outdated language around special needs will need to be more inclusive. Discussion language on

income levels and special needs.			context and improvements to existing neighborhood should be cautious to not leave higher-income, White neighborhoods unchanged or in some way "protected" from change.
H 1.19 Senior Housing Encourage and support accessible design and housing strategies that provide seniors the opportunity to remain within their neighborhoods as their housing needs change.	Discussion: Accessory dwelling units, condominiums, and existing home conversions within centers are examples of other arrangements that reduce maintenance worries and increase access to services.	S	Policy supports accessible design standards for aging in place and addresses displacement risk, though not directly. Policy ideas can also be applied to all to support people of all incomes, racial groups, and abilities to remain in their neighborhood as housing needs change. Could be expanded to include focus on universal accessibility standards that support everyone at all life stages. Housing types referenced in the discussion are not just solutions for senior housing but housing types that could be affordable options for all households. The policy should highlight the need for proximity to health and community services, design standards that promote physical as well as financial accessibility, and the idea that multi-generational housing is as beneficial to a neighborhood as is diversity of housing in general.
H 1.20 Accessory Dwelling Units Allow one accessory dwelling unit as an ancillary use to single-family homes in all designated residential areas as an affordable housing option.	Discussion: Accessory dwelling units (ADUs) increase the amount and variety of available affordable housing. Increasing the variety of housing can help to satisfy changing family needs and the trend of smaller households. ADUs help provide an avenue for seniors, single parents, and families with grown children to remain in their homes and neighborhoods while obtaining extra income, security, companionship and	A	Policy supports more housing options for all, but needs to be updated with current regulations allowing two ADUs per lot and code language to be more inclusive. This was addressed previously in the Building Opportunity and Choices for All and Building Opportunity for Housing initiatives that addressed zoning changes to allow for more housing types across all residential zones. As SMC 17C.300 outlines, ADUs can increase the housing stock and provide a mix of housing that responds to changing family needs and smaller households, and provide a broader range of

	services. Often ADUs allow a more efficient use of existing housing and infrastructure. Accessory dwelling units should be built in a manner that does not adversely affect the neighborhood. They should be designed to be physically and visually compatible with surrounding structures.		accessible and more affordable housing. Policy should be updated to reflect current policy direction and language. Also of note is that allowing for ADUs does not address affordability directly or availability of long-term rental options. ADUs could contribute to displacement risk if ADUs lead to increased property values or rents without mitigation. The policy could be enhanced to reflect affordable housing goals and reduce the impacts of short-term rentals on housing options. This policy should also be reviewed to ensure an equitable distribution of benefits and burdens across neighborhoods. An additional opportunity exists here for a new policy calling on the City to continue its efforts towards making ownership of ADUs separate from the primary home possible, as this could provide another avenue for homeownership citywide.
H 1.21 Development of Single-Room Occupancy Housing Allow development of single-room occupancy units in downtown Spokane and in other areas where high-density housing is permitted.	Discussion: Single-room occupancy (SRO) housing contains units for occupancy by one person. These units may contain food preparation areas, sanitary facilities, or both. Due to their small size, SRO units are less expensive to rent than regular apartments, so they often serve as the only affordable housing option for many lower-income individuals. Maintaining and increasing the supply of SRO housing is an important part of the lower-income housing market.	A	Policy supports single-room occupancy housing as a housing option. Current regulations allow SROs anywhere hotels are allowed. To meet HB 1998, adopted in 2024, the City will need to allow SROs in all residential zones except RA. SROs historically have been a part of the housing stock for people at various life stages, and inclusion of this option allows for people who are not able obtain other forms of housing as an affordable and accessible housing option. Housing quality needs to be considered critical to this to ensure housing conditions are maintained with public health and safety, integrity, and dignity for residents. Could be part of a solution to address homelessness.
H 1.22	Discussion: Both the Growth Management Act and	A	Policy acknowledges need for housing supportive for people with

Special Needs Housing Encourage the retention, inclusion, and development of special needs and assisted living housing.	Countywide Planning Policies require that essential public facilities be fairly and equitably distributed. This applies within jurisdictions, as well as between neighboring jurisdictions. This policy does not apply to criminal or prerelease transitional housing.		disabilities by increasing stable housing. Individuals living with a disability experience inherent barriers to accessing housing and there is a high need for more accessible units for people with disabilities and policies to ensure units are accessible or modified to be accessible. Policy should include universal design standards in all housing by moving away from segregated housing to include independent living and housing options that expand where people can live not limit it. Language needs to be updated to be more culturally inclusive by changing to first-person language. Additional Discussion includes references to criminals, which perpetuates inaccurate and harmful stigma towards people with disabilities and should be removed. The policy should also mention the need for housing to be of the same quality and standard as other housing, avoiding development of substandard housing targeted at vulnerable communities.
H 1.23 Distribution of Special Needs Housing Include units that are affordable for low-income special need families in all housing developments.	Discussion: Adequate housing for special needs populations is in very short supply. New units required within housing developments help fill this need while also helping to distribute the supply of special needs housing throughout the community.	A	Policy is supportive of inclusion and integration of accessible housing into neighborhoods. Language needs to be updated to be more inclusive. Policy should avoid concentrating housing in isolated areas, which can reinforce segregation. Focus should be enhanced to include affordable accessible housing that meets the needs of people with disabilities. The Spokane Fair Housing Plan found that most accessible units are in newly constructed multi-family housing. People with disabilities are often limited to residing in rental units in zones which allow multi-family housing. Policy should support more housing types for

			people with disabilities to find housing that meets their needs.
H 1.24 Taxes and Tax Structure Support state consideration of property tax reform measures that provide increased local options that contribute to housing choice and diversity.	Discussion: Other methods of taxing land have shown different effects on the long-term use of land. Local options for property taxation methods furnish increased tools to guide the health and development of the region. Providing tax relief for low-income housing improvements is one way to encourage community revitalization. Tax increment financing is also a tool for housing improvement in target areas. Taxing land based upon the current use of residential property rather than taxing land on the basis of the highest and best use can help preserve lower-income housing. Developing a tax structure that does not hinder home and land improvements will encourage community revitalization.	A	Policy supports tax relief for low-income households. This can lower household costs, which can minimize displacement risk for low-income households and historically impacted BIPOC communities. One concern raised by this policy is the City's limited ability to control the overall tax structure—language requires update to better represent what is possible rather than an aspirational goal that is unreachable.
H 2 HOUSING QUALITY Goal: Improve the overall quality of the City of Spokane's housing.			
H 2.1 Housing Rehabilitation Provide assistance for housing rehabilitation beyond housing maintenance code requirements if the assistance is supportive of general community development		S	Policy is supportive of preserving and improving existing housing stock, potentially increasing safe and affordable housing availability without requiring new construction. Also supports anti-displacement measures by emphasizing financial solutions to help people stay in their homes. Could be clarified to be more focused on anti-displacement.

activity and is on a voluntary basis.			
H 2.2 Property Responsibility and Maintenance Assist in and promote improved and increased public and private property maintenance and property responsibility throughout the city.	Discussion: Recognition of "good" property owners can help set the standard for others to follow. The city should lead by example and maintain its property to community standards, at a minimum. Additionally, the city should continue to support and fund the repair and rehabilitation of single-family and multifamily housing using federal, state, and local funding sources. Emergency code compliance loans are another method of maintaining standards. When other methods of maintaining minimum community standards fail, a strong code enforcement program is needed to protect surrounding property owners. Enforcement of city codes should not depend solely on complaints filed by neighbors but should be driven by the city's awareness of a violation.	C	Policy supports neighborhood stability, which can support housing retention and community pride. Policy discussion uses coded language around "good property owners" that can reinforce emphasis on dominant culture and who is considered a good property owner by rewarding or targeting certain groups. Policy needs to balance code enforcement with proactive measures to help people address property maintenance to further avoid reinforcement of disparities. Policy should be updated to focus on recent City efforts to integrate proactive code enforcement, like rental registries, and steps to avoid foreclosure and demolition.
H 2.3 Housing Preservation Encourage preservation of viable housing.	Discussion: Housing that is susceptible to redevelopment is often serving lower income households and is an important part of the housing mix within the city. Future sub-area plans should preserve existing viable housing outside of designated center or corridor environments where redevelopment and intensification are encouraged. Often the	A	Policy is focused on anti-displacement. Could integrate language to be emphasize the concept of displacement and the need to mitigate and prevent. Could address areas at highest risk of displacement, and communities most impacted by RDI. Should also expand as a tool not just limited to subarea planning, but throughout the city. Should revise and expand with a stronger set of anti-displacement policies. Beyond anti-displacement, retention and maintenance of existing housing can

	housing that is destroyed cannot be replaced by new housing elsewhere at the same cost level. Sub-area plans should permit the transfer of unused development rights from low-income housing to eligible sites elsewhere in the planning area or the city as a preservation strategy. Information about soon-to-be-demolished housing should be made available to the public, such as on the internet, so that concerned housing-related groups can determine if there are alternatives to demolition when the structure is worth preserving. Options might include purchase of the property or relocation of the housing.		support current affordability of housing, in that even those older units that are well maintained and cared for are generally rented at a lower level than newly constructed housing. The affordability aspect of this policy can benefit all of the community, BIPOC households included.
H 2.4 Linking Housing With Other Uses Ensure that plans provide increased physical connection between housing, employment, transportation, recreation, daily-needs services, and educational uses.	Discussion: The location of housing in relation to other land uses is a part of what determines the quality of housing. The desirability and viability of housing changes for different segments of the community, based on an area's mix of land uses. As complementary land uses become spread further apart, transportation options decrease while transportation costs increase. These added transportation costs reduce the amount of household income available for housing and other household needs. This affects lower-income households first. In urban areas, basic services, such as	A	Policy supports fostering efficient land use that can improve access to housing near key amenities. Acknowledges how housing is integral to a community, and how access to housing can limit or enhance access to other resources, services, and opportunities. Redlining, racially restrictive covenants, and historic zoning practices created the inequities across neighborhoods, so addressing this is critical to ensuring people have well-resourced neighborhoods wherever they live. Policy could be revised to refocus on equity and ensuring all have access to amenities that support their needs, so that improved connectivity does not increase displacement risk from increased property values and rents. It's important to note that several policies in the Social Health

	grocery stores, public transportation, and public parks, should be available within a mile walk of all housing.		and Neighborhoods chapter support the goal of this policy and enhance its effectiveness and application.
H 2.5 Housing Goal Monitoring Provide a report annually to the City Plan Commission that monitors progress toward achieving the housing goals and includes recommended policy change if positive direction toward achieving the housing goals is not occurring.	Discussion: Using readily available datasets as a basis for a simple set of indicators can illustrate progress that has been made to achieve housing goals and policies and provide assistance in determining what actions are needed to implement the goals and policies and whether revisions to the policies are needed. The public can provide feedback about the indicators that are most important to them.	A	Accountability and transparency is an important part of addressing disparate impacts. RDI analysis should be included in any reporting to ensure the city is moving forward on addressing the impacts and that policies are supporting the outcomes intended and not creating new impacts.

8.2 Spokane Housing Action Plan

The City Council adopted the Spokane Housing Action Plan in 2021, with the support of Washington Department of Commerce guidance and grant funding, to help identify actions that the City can consider to promote greater housing diversity, affordability, and access to opportunity for residents of all income levels in Spokane.[86] The Housing Action Plan (HAP) followed a data-driven, community-informed approach, with a focus on equity, to understand the current state of housing needs, identify trends, and develop strategies which can address the need for more housing. Developed between 2019 and 2021, the HAP was a foundational piece to guide implementation of Comprehensive Plan policies and identify policies for future consideration to further encourage housing development to meet our housing goals and policies.

The Spokane HAP outlined four priorities, with strategies and potential actions to assist with the development of more housing for Spokane:

A. **Increase housing supply, options, and affordability for all incomes.** This looks at strategies to support the availability of housing options and encourage the construction of both affordable and market-rate housing.
B. **Preserve housing affordability and quality to help people thrive where they live.** This priority highlights the connections between housing affordability and quality to preserve and enhance existing housing throughout Spokane and support residents in every neighborhood.
C. **Enhance equitable access to housing and homeownership.** This priority seeks to understand and consider the historic context that have contributed to patterns of inequity and encourage the City to break down barriers to accessing housing.
D. **Leverage and grow partnerships to support housing initiatives across the region.** This priority encourages local and regional partnerships to tackle the full scale of housing challenges faced by the community, and across the greater region.

Community engagement informed the priorities and strategies in the HAP. The City assembled a working group with community members representing housing developers, local realtors, nonprofit housing advocates, community groups, faith-based organizations, housing providers, City Boards and Commissions, and agency partners. The City worked with stakeholders and partners to discuss concerns, issues, and feedback on housing, and invited community input through several opportunities. Summaries of the engagement outcomes are available on the HAP City project webpage.

- A series of four roundtable discussions were held in the fall of 2020 discussing development regulations, land use and housing policy, equity in housing, and affordable housing and rental housing.
- The City also conducted a community survey on housing experiences and issues, receiving over 1,200 responses with language access in six languages: English, Arabic, Marshallese, Russian, Spanish, and Vietnamese.

[86] City of Spokane, 2021

- The City conducted a survey targeted at housing industry professionals, regarding housing development trends and gaps.

As a foundational document, the Spokane HAP provided important information, data, and community discussion into identifying housing needs, gaps, challenges, and opportunities. The following table outlines policies from the HAP that support expanding housing options, and implicitly or explicitly address racially disparate impacts and anti-displacement. More details of individual strategies and actions are included in the Spokane HAP.

Housing Action Plan Supportive Strategies

HAP Strategy	**Action**
Strategy that is supportive of expanding housing options, RDI, and equity in housing.	*Action that implicitly or explicitly addresses RDI and equity in housing.*
Goal A. Increase housing supply, options, and affordability for all incomes.	
A1. Explore and expand allowed housing types to encourage missing middle housing throughout Spokane's neighborhoods.	More housing types in currently zoned single-family residential areas
A1. Explore and expand allowed housing types to encourage missing middle housing throughout Spokane's neighborhoods.	Encourage increased density and housing types in all residential areas
A2. Target efforts to increase the development of affordable housing throughout the City to support mixed-income neighborhoods.	Examine incentives for affordable housing, including fee waivers for development of income-restricted units, while also exploring policies to mitigate displacement.
A2. Target efforts to increase the development of affordable housing throughout the City to support mixed-income neighborhoods.	Target efforts to create and preserve dedicated affordable housing in areas with greater services and amenities and expand efforts in lower income neighborhoods to grow economic opportunity.
A2. Target efforts to increase the development of affordable housing throughout the City to support mixed-income neighborhoods.	Explore incentives for the inclusion of more affordable homes in new market-rate development, consistent with Comprehensive Plan Housing Policy H 1.8.
A2. Target efforts to increase the development of affordable housing throughout the City to support mixed-income neighborhoods.	Support efforts among local and regional partners to re-engage and grow a community land trust, including identifying ways to use the City's assets to support this effort.
A6. Leverage public and partner-owned land for housing, including a land bank.	Work with the community to create a land bank that facilitates redevelopment and supports the development and preservation of affordable housing.
A6. Leverage public and partner-owned land for housing, including a land bank.	Consider adaptive reuse and brownfield remediation, when suitable, for affordable housing.

A6. Leverage public and partner-owned land for housing, including a land bank.	Allow more flexibility for faith institutions to increase the number of affordable homes they can build on their property, pursuant to RCW 35A.63.300 and RCW 36.70A.545.
B. Preserve existing housing affordability and quality to help people thrive where they live.	
B1. Expand preventative and proactive code enforcement to help maintain safe and quality housing.	Improve resolution to "zombie" properties by prioritizing receivership instead of demolition.
B1. Expand preventative and proactive code enforcement to help maintain safe and quality housing.	Expand the current model of residential foreclosure property monitoring to include monitoring of other situations that tend to result in concentration of code violations, such as vacancy.
B1. Expand preventative and proactive code enforcement to help maintain safe and quality housing.	Continue to support the City's code enforcement efforts and initiatives aimed at preserving safe and quality housing, including the continued development of a proactive and preventative-based approach to code enforcement, as called for in Comprehensive Plan policy H 2.2.
B2. Align and leverage programs, funding, and resources to preserve the quality and livability of existing affordable housing.	Streamline navigation for community members and City processes to support improved access to housing and community development programs, including providing housing program materials in more languages, increase the frequency of announcements, and improve websites and other materials.
B2. Align and leverage programs, funding, and resources to preserve the quality and livability of existing affordable housing.	Highlight and grow City and partner programs that support affordable homeownership, including single-family rehab programs, essential home repair programs, derelict housing programs, and similar programs offered by partner organizations.
B2. Align and leverage programs, funding, and resources to preserve the quality and livability of existing affordable housing.	Expand resources to mitigate and reverse the effects of environmental hazards, past and present, and promote the health and safety of existing housing, including remediation of existing lead and asbestos in some homes.
B2. Align and leverage programs, funding, and resources to preserve the quality and livability of existing affordable housing.	Explore a local housing trust fund as an ongoing source of dedicated funding to support housing affordability and meet the most critical housing needs.
B2. Align and leverage programs, funding, and resources to preserve the quality and livability of existing affordable housing.	Consider forgiveness of City-controlled liens (i.e. rehab liens) for derelict properties under certain affordable housing criteria.
B2. Align and leverage programs, funding, and resources to preserve the quality and livability of existing affordable housing.	Consider developing criteria for forgiveness of City-controlled liens in order to facilitate redevelopment of derelict properties for affordable housing.

B3. Enhance protections and assistance for renters, particularly the most vulnerable.	Work with community members and tenant advocates to address ongoing barriers to accessing rental housing.
B3. Enhance protections and assistance for renters, particularly the most vulnerable.	Continue community discussions around a set of tenant protections policies.
B3. Enhance protections and assistance for renters, particularly the most vulnerable.	Monitor the efficacy of recently adopted state laws aimed at mitigating tenant displacement, identifying opportunities and gaps where local strategies may be helpful.
B3. Enhance protections and assistance for renters, particularly the most vulnerable.	Identify ongoing sources of rental and utility assistance to promote housing stability post-COVID for low-income households.
B4. Maintain and improve existing affordable rental housing.	Continue to support the purchase of existing affordable housing by non-profit housing organizations and community-based organizations to preserve the housing stock and prevent displacement.
B4. Maintain and improve existing affordable rental housing.	Consider incentives to preserve affordable single-family rentals, to support the maintenance and utilities of homes, and encourage financially responsible involvement.
B5. Study the local short-term rental market to reduce impact on housing affordability, neighborhood identity, and displacement.	Study current short-term rental regulations, informed by local market data, and amend them to limit negative impacts where appropriate.
C. Enhance equitable access to housing and homeownership.	
C1. Reduce barriers and expand access to housing and homeownership for lower income households, first-time homebuyers, people of color, and people with disabilities.	Expand information provided in Spanish, Russian, Marshallese, Vietnamese, Arabic, and other languages to help increase access to housing and community development programs and resources.
C1. Reduce barriers and expand access to housing and homeownership for lower income households, first-time homebuyers, people of color, and people with disabilities.	Support land use and development code regulations that allow diverse housing types and support mixed-income communities, consistent with Comprehensive Plan Policy H 2.2.
C1. Reduce barriers and expand access to housing and homeownership for lower income households, first-time homebuyers, people of color, and people with disabilities.	Prioritize investment and incentives that support housing affordability and stability for low-income residents and people of color in historically underserved neighborhoods, while also increasing access to high-resource neighborhoods.
C1. Reduce barriers and expand access to housing and homeownership for lower income households, first-time homebuyers, people of color, and people with disabilities.	Support partner organizations' efforts to expand homeownership education, outreach, and assistance programming to reach more potential homebuyers, including expanding down payment assistance and financial counseling classes.

C1. Reduce barriers and expand access to housing and homeownership for lower income households, first-time homebuyers, people of color, and people with disabilities.	Support community-based organizations with a commitment to increasing Black, Indigenous, Latinx and People of Color homeownership and reducing the racial homeownership gap.
C1. Reduce barriers and expand access to housing and homeownership for lower income households, first-time homebuyers, people of color, and people with disabilities.	Promote universal design in residential development to support all people regardless of their age, size, and ability in accessing housing to the greatest extent possible, without the need for adaptation or specialization.
C1. Reduce barriers and expand access to housing and homeownership for lower income households, first-time homebuyers, people of color, and people with disabilities.	Work with the community and partner organizations to explore shared equity models to provide home ownership opportunities to low- and moderate-income families, including limited-equity resident-owned communities, cooperatives, and deed restrictions.
C2. Address racial inequities and disparities in housing.	Develop a racial equity framework and expand analysis of equity indicators to inform housing and land use policy, code regulations, and to mitigate displacement.
C2. Address racial inequities and disparities in housing.	Conduct an equity review and update the Comprehensive Plan Housing Chapter if needed.
C2. Address racial inequities and disparities in housing.	Continue work to eliminate barriers identified in the City's Analysis to Impediments of Fair Housing, and affirmatively further fair housing practices in City government.
C2. Address racial inequities and disparities in housing.	Expand research and application of equity and anti-displacement practices to deepen place-based analysis and reflect in policy development.
C2. Address racial inequities and disparities in housing.	Work with community partners to encourage actions that address unfair/discriminatory housing, lending and appraisal practices and increase access to credit.
C2. Address racial inequities and disparities in housing.	Equitably engage and empower all community members to participate in shaping housing policies, particularly those most impacted including but not limited to people of color, people with disabilities, lower income households, renters, refugees, immigrants, women and LGBTQIA+ and other under-represented groups.
C2. Address racial inequities and disparities in housing.	Partner with local organizations to provide fair housing education for housing providers, and fair housing design and construction training for developers, contractors, architects, engineers, and city planning and development personnel.
C3. Preserve and stabilize the viability of existing homeownership for low-income homeowners.	Identify and allocate additional resources for the rehabilitation and maintain viable affordable housing that goes beyond regular upkeep.

C3. Preserve and stabilize the viability of existing homeownership for low-income homeowners.	Encourage proactive counseling and education for homeowners on maintenance and upkeep of their homes.
C3. Preserve and stabilize the viability of existing homeownership for low-income homeowners.	Support programs that reduce tax burdens to help homeowners with costs and stay in their neighborhoods, targeting but not limiting such programs to lower and moderate income, elderly, disabled, and veteran homeowners.
C3. Preserve and stabilize the viability of existing homeownership for low-income homeowners.	Investigate expanding City resources, programming, and partnerships to support home safety modification projects for lower income, disabled, and elderly homeowners.
D. Leverage and grow partnerships to support housing initiatives across the region.	
D2. Leverage partnerships within the health, education, parks, and transportation fields to support housing affordability, access to opportunity and quality of life.	Continue to explore connections and partnerships with school districts on housing, planning, and education outcomes to support greater access to opportunity for all students and families.
D2. Leverage partnerships within the health, education, parks, and transportation fields to support housing affordability, access to opportunity and quality of life.	Leverage partnerships with hospitals and health care institutions to address upstream causes of inequity, promote safe and healthy housing, and maximize positive health outcomes.
D3. Grow and expand use of both local and regional housing data and analysis.	Build partnerships to create a database or registry of affordable and accessible housing. Monitor expiring affordability.

8.2.1 Housing Action Plan Implementation

Following the adoption of the Spokane HAP, and in recognition of the growing housing crisis, the City of Spokane embarked on an ambitious effort to increase housing options and affordability through the reduction of barriers to housing development of all types.

Code changes were made in 2022 to permit accessory dwelling units and streamline and simplify the development permit process:

- **Housing Action Plan Code Changes Phase I.** On June 27, 2022 City Council passed changes to the development code to make Accessory Dwelling Unit (ADU) development more feasible by making development and design standards more flexible for ADUs; removing the Lot Size Transition requirement for subdivisions in the RA and RSF zones, and modifying the notification requirements for short subdivisions and reducing the application fees for preliminary and final short subdivisions.[87]
- **Housing Action Plan Code Changes Phase II.** The Housing Action Plan directed the City to streamline and simplify the development permit process to remove obstacles to building

[87] https://my.spokanecity.org/projects/shaping-spokane-housing/hap-phase-one/

housing. Following recommendations from the Washington Legislature listed in RCW 36.70A.600, the City proposed changes to the permitting process for environmental reviews required under the State Environmental Policy Act (SEPA). Additionally, the City made updates to where and how short-term rentals are approved, recognizing how they impact the housing supply locally.[88]

In 2022, the City adopted an interim zoning ordinance called *Building Opportunity and Choices for All*.[89] This was a pilot program focused on expanded zoning regulations to allow middle housing such as duplexes, triplexes, fourplexes, and townhomes, on any residentially zoned lot in the city and modified site standards to make their development more feasible.

After the interim ordinance, *Building Opportunity for Housing* developed lasting Comprehensive Plan and Municipal Code amendments that increase housing choice and diversity throughout the city in 2023.[90] The goal of this program was to increase housing choice and attainability in the city for all income levels and housing types, focusing most intensely on middle housing options (2-unit, 3-unit, and 4-unit developments).

Policy discussions focused heavily on the Land Use chapter of the Comprehensive Plan so that it was supportive of a diversity of housing types and affordability throughout the city, was more inclusive, and was flexible enough to meet the evolving needs of the community.[91] The City heard from residents that language focused on protecting neighborhood character and emphasizing single-family as the housing type was exclusionary, with a past of racial discrimination, and competed with the interests of providing more housing options everywhere in the city

Key changes to the Comprehensive Plan in 2023 included:

- Changed biased and exclusionary language, including:
    - Removed single-family and two-family residential language to focus on intensity of residential uses
    - Removed language on protecting the character of single-family neighborhoods to instead promote the uniqueness of each neighborhood and diversity
    - Changed focus from compatible uses that can highlight sameness, to complementary which emphasizes an array of options and acknowledges how differences can be beneficial
- Added new language in policy descriptions that support housing choice and diversity
- Added value statement: "Ensuring equitable housing supply by encouraging diversity of housing choice, mitigating the effects of displacement on existing residents, and ensuring attainable and accessible housing for all members of the community"

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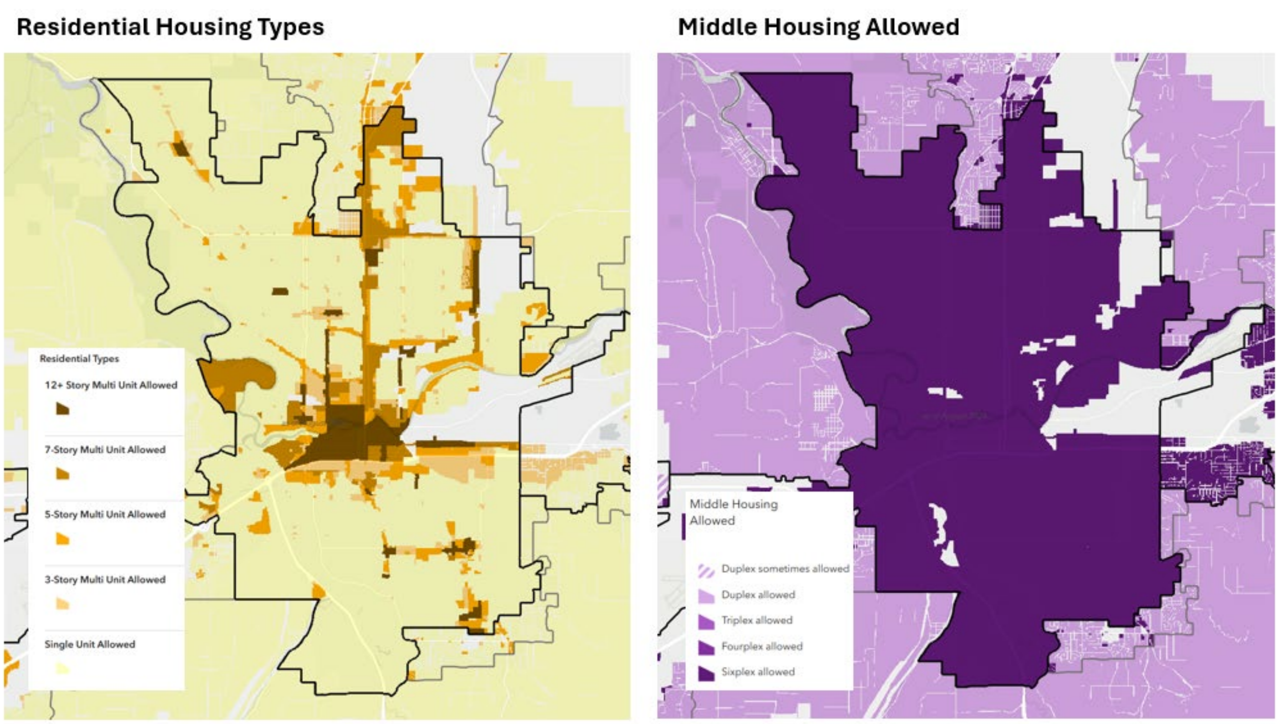
[88] https://my.spokanecity.org/projects/shaping-spokane-housing/hap-phase-two/
[89] https://my.spokanecity.org/housing/building-opportunity/
[90] City of Spokane. (2023a). *Building Opportunity for Housing.* https://my.spokanecity.org/projects/shaping-spokane-housing/building-opportunity-for-housing/
[91] City of Spokane. (2023b). *Building Opportunity for Housing - 2023 Comprehensive Plan Amendment.* https://my.spokanecity.org/projects/shaping-spokane-housing/building-opportunity-for-housing/2023-comprehensive-plan-amendment/

These changes were incorporated into the Comprehensive Plan in 2023 and adopted by ordinance in the Spokane Municipal Code in 2024 with permanent development code changes that continued to reduce barriers to developing housing.[92] Reduced lot size requirements and setbacks, increased height, and removal of parking minimums, along with no maximum density on infill lots provides the regulatory framework for developing even more residential units at a more affordable price. **See Figure 84 and Figure 85**

Key changes to the development code in 2024 included:

- Renamed "Residential Single-Family" to "R1" and "Residential Two-Family" to "R2"
- Matching design standards for single-unit detached homes and Middle Housing developments
- Added Multi-Unit Residential Building to list of permitted housing types in R1/R2 zones to allow Middle Housing types
- No parking required for residential uses within ½ mile of a transit stop, later reduced to no parking required for any use citywide
- No lot density maximums for lots less than 2 acres in size
- Reduced lot size minimums to 1,200 square feet across the majority of the city
- Expanded Unit Lot Subdivision process to allow for greater site flexibility
- Increased building height and reduced front and rear setbacks for some zones

Figure 84. Residential Zoning Uses Allowed

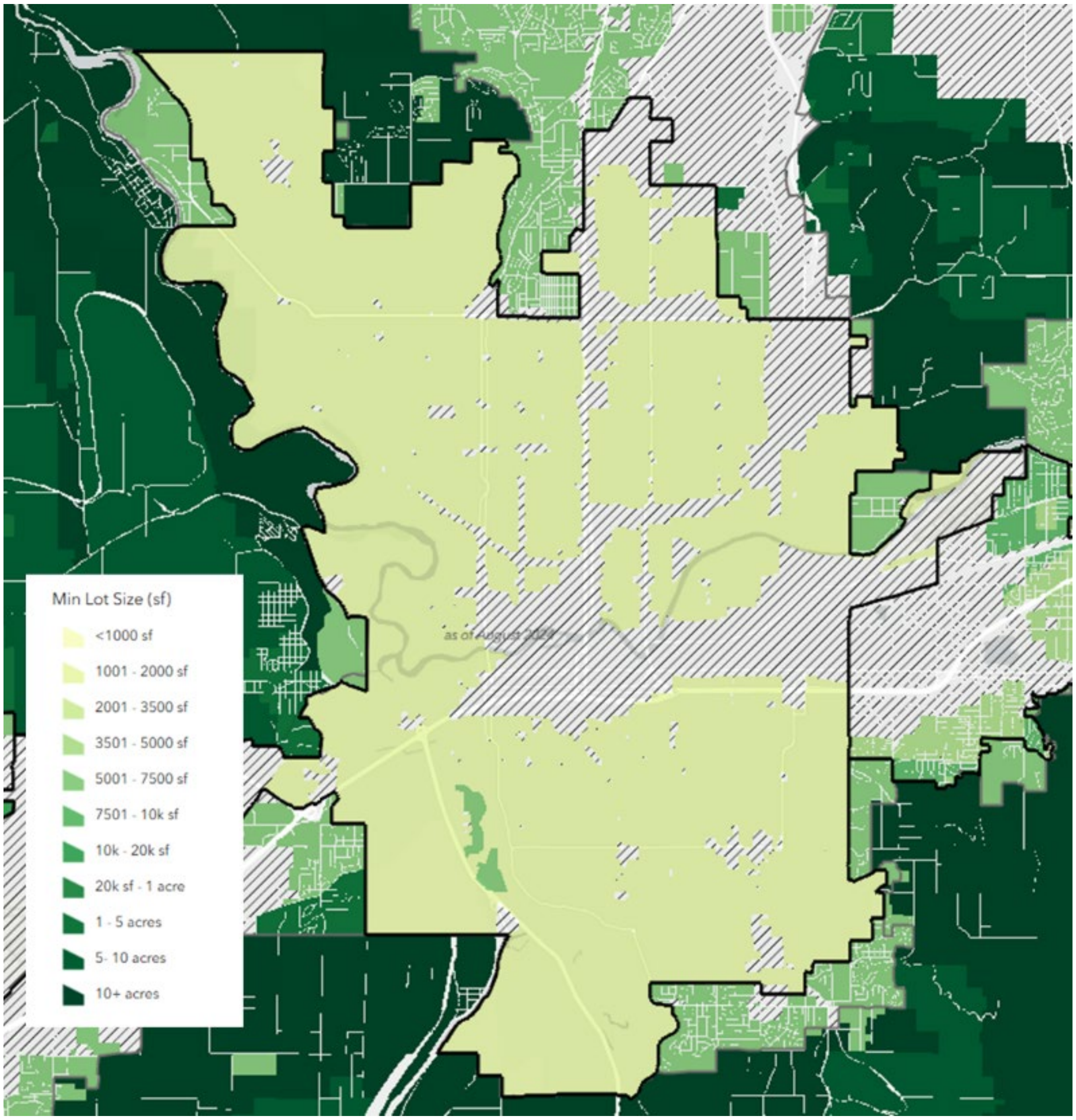


Source: Washington State Zoning Atlas, 2025.[93]

[92] City of Spokane, 2023b

[93] Washington State Department of Commerce. (2025). *Washington State Zoning Atlas (WAZA).* https://www.commerce.wa.gov/growth-management/data-research/waza/

Figure 85. Minimum Lot Size Allowed



Source: Washington State Zoning Atlas, 2025.

8.3 Additional Considerations

8.3.1 Anti-Displacement Menu of Measures

The City of Spokane has identified a menu of anti-displacement measures in previous subarea planning projects, including in the South Logan Transit-Oriented Development (TOD) Plan[94] and the West Central Neighborhood Infrastructure Project that can be implemented to potentially mitigate the risks of displacement.[95] The following table includes anti-displacement measures for further consideration in the Housing Element:

Measure	Details	Target
Community Engagement	Engage early and often with neighborhood stakeholders to ensure all voices are heard.	Community
Rental Assistance Fund	A Rental Assistance Fund is a relatively low-cost way to minimize the impacts of displacement on the most economically vulnerable populations. The Fund could be capitalized through development-related fees or through government or grant subsidy. The Fund would be available to those residents needing relocation cost assistance or to cover security deposit requirements or moving expenses.	Community
Tenant Protections	Support residential anti-displacement strategies for tenants, including relocation assistance, rent stabilization, and 'right to return' policies that give highest preference for housing support due to displacement from new development.	Community, Residential
Community Preference Program	Consider a "community preference" policy which establishes preference for existing residents of the community in applications for affordable housing units to allow for disadvantaged residents of high displacement areas to access priority to new affordable housing units which could directly address displacement.	Community, Residential
Right-to Purchase Programs	Provides tenants and cities with the right to purchase government-assisted multifamily rental properties and mobile home parks when the owner decides to sell a property or exit an affordable housing program. This right is typically provided to qualified nonprofit organizations	Community, Residential

[94] Wharton, B., E. Kang, and L. Striar. Heartland LLC. (2023). *South Logan Strategies Memorandum – Housing & Anti-Displacement.* https://static.spokanecity.org/documents/projects/south-logan-tod/south-logan-tod-final-housing-and-anti-displacement-memo-september-2023.pdf

[95] City of Spokane. (2024c). *West Central Neighborhood Infrastructure Project.* https://my.spokanecity.org/projects/west-central-infrastructure-project/

	with the intent to keep current tenants housed and to prevent disruption of residence.	
Community Land Trusts	Land acquired by public agencies, nonprofits, or community-based organizations that maintain permanent ownership of land. Prospective homeowners are able to enter long-term (i.e., 99-year), renewable leases at an affordable rate. Upon selling, homeowners only earn a portion of the increased property value, while the trust keeps the remainder, thereby preserving affordability for future low- to moderate-income families.	Community, Residential
Housing Rehabilitation	Promote City programs that support affordable homeownership, including single-unit rehabilitation programs and essential home repair programs to help low- and moderate-income homeowners with home maintenance for health and safety.	Residential
Land Bank	Land banks can used in service of other forms of public benefit, which might include in the creation of affordable housing and the development of properties which offer below-market commercial space, both of which contribute directly to anti-displacement goals.	Residential
Use of Development Agreements	A development agreement is a contract between a city and a property owner which summarizes responsibilities associated with redevelopment of land. Development agreements are highly customized and specific to a particular site to maximize public and private benefits. Development agreements can be a useful tool to document an agreement between the City and the property owner to guide development towards certain policy goals, including the creation of housing.	Residential
Minimum Density Requirements	Setting a right-sized minimum density to be structured as an incentive rather than as a requirement. If the density requirement is set at too high a level, development could be discouraged in the near- and medium-term, a counterproductive and unintended consequence. If the requirement is too low, opportunities to add density in strategic locations could be less than capacity.	Residential
Credit Support for Small-scale Developers	Lack of sufficient financial capacity is typically the primary barrier to financing of small projects and stands in the way of a citizen-developer corps who can do the hard but valuable work of locally-led, tactical, small-scale development.	Residential
Subsidy for Less Common Ownership Models	Land trusts, limited-equity cooperatives, and co-housing are relatively rare in the United States, but can be powerful models for long-term affordability and anti-displacement protection.	Residential
Middle Housing	Address housing choice and affordability, considering requirements for deeper affordability outcomes	Residential

Affordable Housing Density Bonus	In Spokane, projects with 25% or more units designated as “affordable” are granted expanded ground floors (building coverage) and additional floor area. Affordable housing bonuses can expand beyond these provisions to include bonus height, density, and waivers to typical costs such as off-site infrastructure impact fees.	Residential
Public Investments in Infrastructure to Support Development	Building housing along older commercial corridors can involve hidden risks and challenges. Chief among those risks is uncertainty and cost associated with older infrastructure like sewer, water, and electricity. Cities, regional governments, and states can play a role in accelerating housing production by making investments in aging sewer, water, and electric infrastructure at a neighborhood-wide scale to reduce financial barriers to housing development.	Residential
Low-Cost Rental Housing Preservation	Preventing displacement and preserving "naturally occurring" affordable housing through acquisition, low-interest loans/revolving loan fund for preservation, and/or code enforcement. Example: The Oregon Legislature committed $15 million in lottery bonds to Oregon Housing and Community Services (OHCS) in 2019 to create a naturally occurring affordable housing loan fund modeled after the Greater Minnesota Housing Fund.	Residential
Public Development Authority (“PDA”)	PDAs play a critical role in addressing displacement pressures arising from rising housing costs and gentrification in urban environments. These authorities can implement a range of strategies to promote equitable development and prevent the displacement of vulnerable residents and businesses. Consider structuring PDAs to respond to community needs, like the example of Cultural Space Agency (CSA) in Seattle, which is a Public Development Authority that secures long-term affordable cultural space with community partners. Cultural spaces forestall cultural displacement by giving community members a place to assemble, organize, celebrate, and create a sense of connection. CSA partners with communities of color to create opportunities for ownership of commercial cultural space.	Commercial, Residential
Reduce or Eliminate Minimum Parking Requirements	Reduce or eliminate parking requirements, in exchange for a contribution in lieu which furthers the public benefit.	Residential, Commercial
Building Heights	Support increasing allowable building heights along transit corridors. Consider pairing with neighborhood Design Standards, especially in critical, high visibility areas.	Residential, Commercial
Commercial Anti-Displacement	Create and implement commercial anti-displacement strategies to keep and give preference to local, historic, and unique businesses in redevelopment.	Commercial

Flexibility for Ground Floor Retail Requirement	Flexible ground floor standards that permit but do not require retail, or require a smaller portion of the ground floor (e.g. corner space of buildings at intersections), would allow opportunities for retail to flourish in the right locations without also creating an impediment to new housing construction. Certain ground floor design or construction standards such as minimum floor heights can be employed to ensure flexibility to convert residential or "flex" space to convert to retail over time should demand for retail space increase in a particular location.	Commercial
Tax Increment Financing ("TIF")	Tax Increment Financing (TIF) can be used for the "purchasing, rehabilitating, retrofitting for energy efficiency, and constructing housing for the purpose of creating or preserving long-term affordable housing," RCW.39.114.	Commercial
Facilitate Public-Private Partnerships	Partner with institutional partners, like universities, to support business and economic development in strategic areas.	Commercial
Business Improvement District ("BID")	BID could have as a guiding philosophy the support of new and preservation of existing local businesses, along with provision of funding programs, advisory services, and political advocacy.	Commercial
Affordable Commercial Tenanting	Provides public subsidy of commercial rents for qualified tenants in new construction. In Portland, OR, the City's Affordable Commercial Tenanting Program addresses the displacement of small businesses from Portland's urban neighborhoods. The program provides incentives to property owners in exchange for below-market rents for commercial tenants. Tenants must satisfy certain conditions including revenue thresholds, cultural contributions to the neighborhood.	Commercial
Small Developer Technical Assistance	Small loans ($20,000-$50,000) coupled with technical assistance to help local land owners and entrepreneurs build new development or renovate existing structures. Program features low-barrier underwriting, and very low or no interest.	Commercial
Storefront Improvement Program	Grants (typically <$50,000) for small-scale revitalization projects such as rehabilitation of street-facing building facades including storefronts, cornices, gutters and downspouts, signs and graphics, exterior lighting, canopies and awnings, painting and masonry cleaning, and limited security and accessibility improvements.	Commercial
Small Business Alliance	Develop a business association focused on small or home-based businesses. Ensure this group is narrowly focused on issues impacting the neighborhood. Should be facilitated by City staff who can also provide technical assistance.	Commercial

Local Vendor Collective	Resources to support home-based and other businesses without brick-and-mortar space. In Vancouver, BC, the vendor's collective offers vending opportunities to low-income artists, craftspeople, and entrepreneurs with experience in the informal economy. Resources could include booths and/or table space, publicity and event organization, dedicated space for vending activities.	Commercial

8.3.2 Spokane 2024 Fair Housing Plan

The Spokane 2024 Fair Housing Plan[96] also outlined several recommendations based on the fair housing analysis and community feedback. These are included here as further consideration for the Housing Element. More information and context are provided in the Fair Housing Plan.

Middle Housing Recommendations:

- Middle housing needs to be expanded to include an affordability requirement.
- Allow and incentivize mid-size development like 6-plexes, which can be harder to build cost-effectively than larger multi-family complexes.
- Anti-displacement measures should be developed with middle housing to minimize displacement that may occur if affordable housing is demolished to make way for new middle housing. Stakeholder concerns expressed include:
    - Affordable housing will be lost and replaced by higher rent units
    - Housing that typically has lower barrier background screening policies will be eliminated and replaced by developments that utilize more stringent screening criteria and check criminal history
    - Remodels, demolition, and building of ADUs will allow tenants to be terminated with no cause notice and displaced
- Consideration of policy for right of first return requirement for displaced tenants
- Open more zoning for larger multi-family housing, not just missing middle type

Mixed Use Housing

- Promotion of “Community Model” of housing to create mixed use and mixed income housing to allow for owners, renters, low- and high-income households, seniors, and families with children to interact with walkable neighborhood development and access to green space, public transit, grocery stores, playgrounds, gardens, and libraries.
- Barrier to developing housing in and near grocery and other commercial amenities is zoning laws which limit commercial development in residential-only neighborhoods.
- Land which the City may have available to develop may be under long-term contracts, during which time it may be difficult to change to mixed-use.
- “Social housing” was suggested by several interviewees and survey participants as a desirable mixed-income housing model, where everyone pays 30% of income, regardless of income.

[96] City of Spokane, 2024a

Siting of Affordable & Permanent Supportive Housing

- Much of Spokane's affordable housing and permanent supportive housing development has been concentrated downtown, in part due to zoning, available property to build, and central access to social services. Clustered housing can put people recovering from substance use disorder near those currently using and make it difficult to escape a cycle of relapse, a serious concern especially amidst the fentanyl epidemic.
- Need for increased scattered site affordable housing. Scattered site housing allows people more options for neighborhood access and deconcentrates people with low incomes from only living near each other. Scattered site housing also enables people to have different housing experiences besides large apartment building living, access different neighborhoods, and increase equity in school systems.

Tenant Protections

- Changes to tenant screening requirements
- Rental registry should move from voluntary to enforcement, and require inspection before renting, not just cause-based inspections of residential rental property.
- Need for ongoing rental assistance

Racial Equity

- BIPOC people need to be included in City and Regional Boards and Commissions.
- Racial equity analysis to examine policies, programs, and practices to identify racial disparities and uncover systemic biases, and then use race-neutral metrics, such as poverty rates and percentages of area median income, to design equitable programs.
- Expand interpreting and translation services
- Providing rental applications in other languages

8.4 Policy Summary

The policy evaluation analyzed the 29 housing policies currently in the Shaping Spokane Comprehensive Plan, as of August 2025. Based on the evaluation, the Housing Element has a range of policies that are supportive of or approaching addressing housing needs and housing opportunities, with few that are considered challenging. The policy evaluation outcomes include:

- 10 supportive policies
- 16 approaching policies
- 2 challenging policies
- 1 policy found not applicable to the evaluation questions

A summary of the policy analysis outcomes per current Housing policy (as of August 2025) is:

Housing Element Policy	Supportive	Approaching	Challenging	NA
H 1.1 Regional Coordination		■		
H 1.2 Regional Fair Share Housing			■	
H 1.3 Housing Employer-Sponsored		■		
H 1.4 Use of Existing Infrastructure		■		
H 1.5 Housing Information	■			
H 1.6 Fair Housing	■			
H 1.7 Socioeconomic Integration	■			
H 1.8 Affordable Housing Requirement	■			
H 1.9 Mixed-Income Housing	■			
H 1.10 Lower-Income Housing Development Incentives		■		
H 1.11 Access to Transportation		■		
H 1.12 Affordable Housing Funding Sources	■			
H 1.13 Siting of Subsidized Low-Income Housing		■		
H 1.14 Building, Fire, Infrastructure, and Land Use Standards		■		
H 1.15 Performance Standards				■
H 1.16 New Manufactured Housing	■			
H 1.17 Partnerships to Increase Housing Opportunities		■		
H 1.18 Distribution of Housing Options	■			
H 1.19 Senior Housing	■			
H 1.20 Accessory Dwelling Units		■		
H 1.21 Development of Single-Room Occupancy Housing		■		
H 1.22 Special Needs Housing		■		
H 1.23 Distribution of Special Needs		■		
H 1.24 Taxes and Tax Structure		■		
H 2.1 Housing Rehabilitation	■			
H 2.2 Property Responsibility and Maintenance			■	
H 2.3 Housing Preservation		■		
H 2.4 Linking Housing With Other Uses		■		
H 2.5 Housing Goal Monitoring		■		

Substantial progress has been made in addressing policies that have a discriminatory effect through the previous land use and code changes. Additional work can still be done to address the impacts and implement policies and regulations to strengthen the City's ongoing focus on equity in housing, including:

- Editing language to strengthen and clarify existing policies.
- Incorporating the recommendations of the Housing Action Plan, anti-displacement studies, and the Fair Housing Plan.
- Identifying new policies that are needed to better address existing racially disparate impacts, displacement, and exclusion in housing.
- Identifying new policies to prevent future displacement.
- Considering how policies overlap in the Comprehensive Plan to fully address racially disparate impacts, displacement, displacement risk, or exclusion in housing.

With adjustments in the following areas, many policies in the Comprehensive Plan can be adapted to be more supportive:

Anti-Displacement

- Directly address displacement risk by incorporating language, framing, and measures that promote a stronger focus on anti-displacement. This includes adding explicit anti-displacement language to policies encouraging development in well-serviced or high-cost areas.
- Prioritize supporting residential anti-displacement strategies for tenants, including relocation assistance, rent stabilization, and 'right to return' policies
- Incorporate anti-displacement in transit and commute policies by amending policies that promote infill and transit-oriented development to preserve existing residents, especially in historically marginalized neighborhoods.
- Balance investment with displacement risk in areas that are targeted for housing growth, job growth, and investment over the next 20 years. Ensure that policies do not protect high-income, White neighborhoods from change while pushing new development and growth into historically marginalized areas.
- Explore displacement impact analysis in infrastructure projects and public investments, land use and zoning decisions, housing programs, and use of public funds.
- Create commercial anti-displacement strategies to keep and give preference to local, historic, and unique businesses in redevelopment.

Moderate-Income Housing

- Focus on moderate-income housing (80-120% AMI) to avoid gaps in housing opportunity for households who don't qualify for subsidies, but can't afford market-rate housing.
- Support the preservation and expansion of pathways to homeownership for those who have historically been excluded, including opportunities for single-unit homeownership. This includes a focus on preserving affordable housing and homeownership pathways in historically underinvested areas that have identified housing capacity and may be targeted for housing growth.
- Incentivize midsize residential development to support housing options for lower income households.

Affordable Housing

- Consider an affordability requirement in middle housing to ensure housing development is supporting all income levels.
- Prioritize mixed-income housing to reduce exclusion and avoid concentration of poverty.
- Pair transit investment with housing affordability protections.
- Prioritize low-income and historically marginalized groups, in addition to supporting housing opportunities for all, to ensure outcomes are targeted to equitably distribute benefits, and overcome socioeconomic isolation and loss of community wealth building.
- Incorporate policy tools like rent stabilization, repair/rehab support, tax relief, community preference, and tenant protections to prevent displacement.

Code Enforcement

- Prioritize supportive and proactive approaches and integrate current practices like rental registries and education.

Community Ownership Model

- Promote community-owned homeownership and equity models, including community land trusts, cooperative housing, and resident ownership models.
- Promote mobile home preservation and updated manufactured home standards that allow for a greater amount of diversity in type, construction, and location.

Accessibility and Disability Inclusion

- Remove and update harmful/stigmatizing language.
- Encourage accessible homeownership in addition to accessible rentals.
- Promote inclusive housing design, independent living, and affordable accessible housing.
- Avoid policy outcomes that concentrate housing in isolated areas based on affordable housing types or zoning.

Funding and Partnerships

- Consider expanding funding opportunities and incentives, usually going to developers and housing providers, to include funding or incentives that support and benefit residents directly, like rental assistance.
- Support BIPOC-led development, partnerships with BIPOC organizations, and workforce development and training in the development, construction, real estate, finance, and other private sectors.

Access to Information and Education

- Expand housing information and education to include language access equity.
- Support partnerships with BIPOC organizations to expand culturally relevant homeownership education and outreach.
- Include lived experience in design and programming around housing information to ensure informed and relevant outreach.

Strengthen Accountability

- Reference fair housing as a requirement in the policy language.
- Identify key indicators for monitoring housing and racially disparate impacts that can be included in reporting for accountability and transparency, with community involvement.

8.5 Next Steps

The City of Spokane has taken steps to begin to undo the impacts of racially disparate impacts in housing, a legacy of historic policies and practices that continue to impact residents' ability to access housing and opportunities today. Building on the work the City has already completed, the policy evaluation sets the stage for a strengthened focus on housing equity and accessibility over the next 20 years.

The policy recommendations within this report will be implemented through the PlanSpokane 2046 Periodic Update to the comprehensive plan, in which existing policies will be revised and new policies will be added to better meet the needs of the community and begin to undo the harms of racially disparate impacts and displacement risk. The comprehensive plan lays the foundation for priorities for the City and guides the regulations, plans, funding, and incentives.

In addition to the policies within the comprehensive plan, there are likely both supportive and conflicting regulations within the Spokane Municipal code as well. Once the housing policies within the comprehensive plan have been updated, implementation of these policy priorities will occur through updates to regulations in the Spokane Municipal Code, incentive programs, funding priorities, and additional plans. Updates to these regulations and the establishment of programs to implement the policy priorities will come as part of the adoption of PlanSpokane 2046 in late 2026.

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