

**Snohomish County Urban County Consortium  
Analysis of Impediments to Fair Housing Choice  
Final Report  
September 14, 2012**

**Summary of Comments Received and County Responses to the Comments  
February 12, 2013**

The County made the Analysis of Impediments to Fair Housing Choice (AI) for the Snohomish County Urban County Consortium (Snohomish County Consortium) available for a 30-day public review and comment period from October 17, 2012, to November 16, 2012. The County received three comments on the AI. The County appreciates the input provided and has considered the comments received. The full text of each comment is provided below along with the County's response.

1. Comments from Janinna Attick, Housing Authority of Snohomish County

**A. First Comment**

Below are comments from HASCO on the County's Fair Housing AI. Please see below and let me know if you have any questions about any of these items.

- On page 87 of the PDF, the AI refers to the 2010 AI conducted for HASCO. I don't know if you are interested in having more current information in your AI – however, HASCO now administers over 3,300 vouchers, including 160 VASH. (The increase is due to the additional VASH vouchers, as well as the 50 non-elderly disabled vouchers for persons leaving institutions and the 50 Family Unification Program vouchers we have received since our AI was completed.)
- On page 90, the AI discusses HASCO's wait list and states that HASCO makes exceptions to the first-come, first-served wait list for "certain households with extenuating circumstances." It would be more accurate to state that some of the vouchers HASCO administers have been designated by HUD to provide assistance to specific populations, and that those vouchers are allocated via referrals from other agencies – Veterans Administration for the VASH vouchers and DSHS for the non-elderly disabled and Family Unification Program (FUP) vouchers. Also, the list of populations mentions youth aging out of foster care, but not families involved with the child welfare system, which is the other population eligible for FUP vouchers.
- Page 92 states that we received bonus points on our SEMAP assessment for our efforts to deconcentrate poverty. I have confirmed with our Tenant-Based Assistance Director that while we do take other steps to expand housing opportunities outside areas of poverty and minority concentration in accordance with SEMAP, we do not opt to receive these bonus points and this statement was incorrectly included in our AI from 2010. Can you please have this statement removed from the County AI?

- Pages 148-149 mention that most of the housing authorities' rental units are more than 50 years old and are small units. I wanted to clarify that our public housing properties were all built in 1979 or later, with most built in the 1980s and early 1990s. Of our 210 public housing units, 9 units (about 4%) are 4-bedroom units, and 86 units (about 41%) are 3-bedroom units. This statement may be more accurate for EHA's public housing portfolio.
- Page 155 mentions the Single Family Rehab program and states that the program is likely to be discontinued. As you likely are aware, the program, which HASCO used to administer, has ended as of June 30, 2012.

Thank you for the opportunity to comment and please let me know if you have any questions.

## **B. Second Comment**

I have one additional item to add to my second comment below. As we have discussed previously in regard to the Con Plan, HASCO also has 305 vouchers that we are required by HUD to provide to non-elderly disabled households. Upon turnover, these slots are filled by families on our regular wait list rather than through referrals like the other special vouchers mentioned below. Non-elderly disabled households are defined as households where the head, co-head, spouse, or sole member is under age 62 and disabled, including families with children that meet this definition.

## **C. County Response**

- Section III, Page 2 of the AI (PDF Page 87): Since the data source for the items referenced was clearly identified in the Snohomish County Consortium AI and is a recent data source (HASCO's 2010 AI which is dated June 30, 2011), the County will not make updates to this data in this document at this time. However, the County will continue to use updated information from HASCO regarding the affordable rental housing units and rental housing vouchers it manages in future consolidated planning and reporting documents.
- Section III, Page 5 of the AI (PDF Page 90): The County has issued an errata sheet to the Snohomish County Consortium AI which clarifies the information on vouchers administered by HASCO for specific designated populations. The third full paragraph on Page 5 of Section III (PDF Page 90) of the Snohomish County Consortium AI has been amended to read as follows:

A household's place on the wait list is on a first come first serve basis. However, HASCO does make exceptions for certain households where the vouchers have been designated by HUD to provide assistance to

specific populations. The vouchers are allocated from HASCO's waitlist or via referrals from the Veterans Administration and the Department of Health and Human Services (DSHS), depending on the population served. Families whose head of household are in one of the following categories, and also meet other eligibility criteria, may qualify for one of these special purpose vouchers:

- Homeless Veterans, referred and supported by Veterans Administration (VA);
  - Non-elderly (under 62) disabled – confirmed by HUD stated disability form, SSI;
  - Non-elderly (under 62) disabled persons exiting health care facilities, referred and supported by DSHS;
  - Families involved in the Child Welfare System and youth aging out of foster care who lack adequate housing, referred and supported by DSHS.
- Section III, Page 7 of the AI (PDF Page 92): The first bullet point under the third paragraph on Page 7 of Section III (PDF Page 92) of the Snohomish County Consortium AI refers to bonus points awarded by HUD to HASCO on its Section Eight Management Assessment Program (SEMAP) for its efforts to de-concentrate poverty. The County has issued an errata sheet which deletes this bullet point as it was based on incorrect information in HASCO's 2010 AI.
  - Section V, Pages 16-17 of the AI (PDF Pages 148-149): The County does not currently have comprehensive data on the age of all the assisted rental units managed by the Everett Housing Authority (EHA) and the Housing Authority of Snohomish County (HASCO). HASCO provided some additional information indicating that most of its affordable housing inventory, which includes the 210 public housing units as well as an additional 1,916 other units, are in the range of 20 to 40 years old. The County acknowledges that HASCO has three- and four-bedroom units in its inventory. HASCO provided additional data showing that of 645 of its 2,126 housing units, approximately 545 (85%) are studio, one- and two-bedroom units, another 91 (14%) are three-bedroom units, and nine (1%) are four-bedroom units.

However, the County notes that the summary in the Snohomish County Consortium AI relating to the need identified by the persons interviewed does not identify what specific size of units for larger refugee and immigrant families are needed and what would be considered a small or large unit in this context. Therefore, the County will not make updates to this data in the AI report at this time. However, it proposes that additional data compilation and analysis be undertaken as part of Action Item 5 in

the Fair Housing Action Plan to more clearly determine the size of larger units needed and the scope of need in the community in order to address this barrier. The County is currently in the initial planning stages for implementation of the Fair Housing Action Plan and more details will be forthcoming.

- Section V Pages 23 of the AI (PDF Page 155): At the time the consultant for the Snohomish County Consortium AI originally requested information on HASCO's Single Family Rehab program, it had not yet been discontinued. The County acknowledges that the program was discontinued as of June 30, 2012, before the final AI report was published for public comment. In addition, although no new loans are being provided under the program, the Consortium currently provides CDBG funds for HASCO to provide loan servicing activities for the existing loans.

## 2. Comment from Matt Phillips, Volunteers of America Dispute Resolution Center

### **A. Comment**

Thanks for the report. We had a few comments:

We believe the report makes a lot of really good points. In particular, we were extremely pleased that the report recommended on page 19 of the Executive Summary, Action Item number 5 explicitly points out that "The County should work with VOA to expand their renter certification program". We have seen a tremendous need these past 6 years and have been open about our desire to expand the renter certification program. We look forward to working with the County to potentially expand the program in a way that meets the County's goals.

However, we believe it should also be noted that there is a considerable number of references to the work that VOA Rental Housing Mediations Services performed. Some examples are the landlord-tenant information to low income individuals/families, fair housing information, fair housing seminars and the contributions to CHRB which are mentioned on pages 37, 45, 46, 112, 115, 116, 135, 162, 163, 182. These services are no longer being provided due to CDBG's elimination of the Rental Housing Mediation Services Program. Although we continue to receive hundreds of call each month, we simply do not have the staffing to provide these services highlighted in the report.

We continue to look for funding for these discontinued services but would love any direction that can be provided in securing these needed services.

Thanks.

## **B. County Response**

The County notes that the specific item referenced by the Volunteers of America under Action Item 5 related to the renter certification program is for the County to work with Volunteers of America to expand this program “to include a component on fair housing rights.” This has been identified as a specific action item in the County’s and Consortium’s Fair Housing Action Plan Goal Matrix for the 2013 program year which will run from July 1, 2013, through June 30, 2014. The County is currently in the initial planning stages for implementation of the Fair Housing Action Plan and more details will be forthcoming. The County is pleased that the Volunteers of America Dispute Resolution Center has expressed an interest in working together to meet this goal.

### 3. Comment from Kristin Kelly, Futurewise and Pilchuk Audubon Society

#### **A. Comment**

See attached letter from Kristin Kelly, Futurewise and Pilchuk Audubon Society

#### **B. County Response**

The Snohomish County Human Services Department appreciates the input provided by Ms. Kelly of Futurewise and the Pilchuk Audubon Society. While the input provides important considerations for planning, community development, and urban form issues, the Human Services Department thinks that these items are more properly considered as part of the comprehensive planning process for the County and the local jurisdictions within the county and the budget planning and budget processes for local and regional transit agencies. The County encourages Futurewise and the Pilchuk Audubon Society to participate in any public input opportunities for these processes which they feel are relevant to the issues they have raised. Additionally, it is also important to note that the AI is not about affordable housing per se, which the comments seem to address, rather than the issue of fair housing, which is about access to housing, affordable and market rate, and the presence of, or potential for, discrimination in access to housing. While housing affordability is an issue in the community, it is not the subject of the present study. Also, issues of budget for transit are beyond the scope of the AI.

The Human Services Department has provided a copy of the Snohomish County Consortium AI to each of the local jurisdictions in the Snohomish County Consortium and to the County’s Department of Planning and Development Services. As the County works with local jurisdictions and other community partners to implement the Fair Housing Action Plan, there may also be an opportunity to consider some of the issues raised to the extent that they pertain specifically to fair housing and overcoming impediments to fair housing barriers in our community.



November 14, 2012

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**Re: Comments on the “Analysis of Impediments to Fair Housing Choice” Final Report, September 14, 2012**

Dear Ms. Tracy:

Thank you for the opportunity to review and comment on the Final Report of the Analysis of Impediments to Fair Housing Choices. I write today on behalf of Futurewise and Pilchuck Audubon Society’s Smart Growth program and our thousands of members in Snohomish County. Futurewise is a statewide nonprofit organization that promotes healthy communities while protecting farmland, forests and shorelines. Pilchuck Audubon Society’s Smart Growth program works hard to stem the consequences of irresponsible development, and to ensure that sensitive areas and wildlife habitat maintain a high profile in growth management debates. Together we work to ensure that Snohomish County and its cities adopt sustainable land use, housing, and transportation policies in order to protect critical farmland, forests, and shorelines and create more livable communities.

The Final Report is a thorough, well-researched document that both informs and offers actions to increase access to affordable housing for low and medium income residents of Snohomish County. Given the nature of our work, we offer four recommendations for inclusion in the Final Report to create even more affordable housing opportunities for Snohomish County.

**1. Modify Action Item 3 or 5 to encourage the use of inclusionary zoning in urban centers and transit-oriented centers.**

The Final Report rightly acknowledges that the County has already taken steps to adopt policies, zoning, and regulations to create more opportunities to build affordable housing at our designated Urban Centers. However, it also highlights a concern amongst stakeholders that there is more opportunity to place multi-family housing closer to transit – that is, the County has not gone far enough to ensure that affordable housing actually be incorporated into the residential portion of these Urban Centers.

Improving access to affordable housing at or near transit stations is critical to reducing overall household costs for Snohomish residents. Transportation costs can indirectly affect the ability of low and medium income residents to afford housing. While some housing seems more affordable in the rural areas or in the more rural, small cities in Snohomish County, adding in the

cost of owning a car to be able to get to work and services, increases the cost of housing considerably. Many people are trying to rely on transit services in these outlying areas; but as documented, Community Transit has cut its budget by 35 percent over the last two years, and it has decreased the amount of routes serving outlying cities and rural areas, as well as eliminated Sunday service. Given these challenges, it is imperative that more affordable housing is located near existing transit services.

Instead of relying on incentives alone, the Final Report should recommend to the County and its cities to adopt inclusionary zoning regulations to ensure some mix of affordable housing in Urban Centers and other transit-oriented communities. Inclusionary zoning has been shown throughout the U.S. to be a very effective tool in increasing the affordable housing supply, which is important for sustainable communities. Inclusionary zoning can:

- Expand housing opportunities by providing housing to meet the needs of people of all abilities, income levels, and household types. It can also be used to help coordinate housing with existing jobs, transit and services.
- Advance equity to ensure social and economic justice by providing a more level playing field for developers and encouraging more low- and moderate-income housing.
- Increase job and businesses opportunities by increasing the supply of moderately priced housing for local workers.
- Provide a predictable process for developers and lenders that give more certainty up front about the feasibility of a development proposal.

Inclusionary zoning is simple to understand and apply, and coupled with density bonuses and other incentives, allows higher-income communities to achieve a balanced economic composition. A Housing Policy Brief jointly published from the Center for Housing Policy and The Furman Center for Real Estate and Urban Policy at New York University documents that well-designed inclusionary zoning programs produce significant numbers of affordable housing without significantly reducing housing production or increasing housing costs.<sup>1</sup>

## **2. Amend Action Item 3 to encourage large and medium sized cities to adopt Complete Streets ordinances to improve accessibility.**

The Final Report recognizes that an impediment to affordable housing is the lack of sidewalks and accessible areas. We strongly recommend that the Final Report encourage Snohomish County and its largest cities adopt Complete Streets policies and regulations. More and more communities are adopting complete streets policies to improve road safety for neighborhoods, improve economic vitality of commercial areas close to residential neighborhoods, and allow for more active transportation that improves people's health. Further, most local governments recognize that these policies also provide more avenues for residents who can not afford a car, or

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<sup>1</sup> Policy, C. f., & University, T. F. (March 2008). *The Effects of Inclusionary Zoning on Local Housing Markets: Lessons from the San Francisco, Washington D.C., and Suburban Boston Areas*. Retrieved from National Housing Conference: [http://www.nhc.org/media/documents/IZ\\_in\\_SF,\\_DC,\\_Boston.pdf?phpMyAdmin=d3a4afe4e37aae985c684e22d8f65929](http://www.nhc.org/media/documents/IZ_in_SF,_DC,_Boston.pdf?phpMyAdmin=d3a4afe4e37aae985c684e22d8f65929)

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sometimes even the cost of a bus, to be able to do necessary daily activities, like grocery shopping, going to the doctor, to the library, etc.

**3. Amend Action Item 7 to seek new transit investments now, not when the economy rebounds.**

We cannot wait for the economy to rebound before we invest more resources in transit. As the Final Report indicates, many people are trying to rely on transit services but find it difficult given that Community Transit has already cut its budget by 35 percent over the last two years. This cut to service has decreased the service to outlying cities and rural areas, as well as eliminated Sunday service for all users. Community Transit has also increased fares and delayed capital investments. But because we are already capped at our sales tax authority, Community Transit cannot do anything else to prevent additional service cuts without further action by the legislature. We encourage the Final Report to support Community Transit's need to acquire new local taxing options from the legislature now, so that they are prepared to keep our economy moving forward.

**4. Create a new Action Item to acknowledge the opportunity to take bold action to address many of the Action Items identified as part of the Major Update to the Comprehensive Plans of Snohomish County and its cities, due in 2015.**

Snohomish County and its cities will be updating their Comprehensive Plans to adopt a blueprint for how and where the community will grow over the next twenty years. This is an excellent opportunity for each jurisdiction to incorporate targets, policies and regulations that will provide more opportunities for affordable housing, which include inclusionary zoning, transit oriented communities, complete street policies, and transportation policies and revenue to increase transit services.

Thank you for consideration of our recommendations.

Sincerely,



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