

EXPANDED HOUSING ELEMENT CHECKLIST

Periodic Update Checklist for Fully-Planning Cities and Counties¹ with additional checklist items for housing element review.²

City of Bainbridge Island _____
Jurisdiction

DRAFT _____
Submission type (Draft or Adopted)

This checklist provides the framework Commerce staff will use to review periodic update housing element submissions. It may also be used by local jurisdictions to guide them through their work. **This checklist is NOT required to be completed by each jurisdiction unless the jurisdiction has applied for the Housing Accountability Act (HAA) Voluntary Review program or has been selected for the HAA Selected Review program.**

- Jurisdictions may submit draft housing elements to [Laura Hodgson](#) for initial review prior to 60-day review to receive early feedback on how the element meets the requirements.
- **Housing element submissions must include a land capacity analysis (LCA) reflecting updated policies.** This LCA may be included as an appendix.
- Commerce staff will review comprehensive plans for the items noted below each requirement. More information on these requirements is included in parenthesis if additional information is needed. (Land use element review items and STEP regulations are included for reference to ensure consistency between elements and the LCA.)
- Commerce will also track that zoning changes made with the periodic update are consistent with comprehensive plan changes and the LCA ([RCW 36.70A.115](#)). These zoning changes implement the policies in the comprehensive plan.
- **Questions?** Contact Laura Hodgson at Laura.Hodgson@commerce.wa.gov or 360-764-3143.

¹ The checklist items in this document are applicable to cities and counties, unless otherwise noted, but the headings in the checklist may be slightly different from the county checklist.

² The December 2025 checklist includes one new development regulation requirement (d) and minor updates to the material Commerce will review for to ensure consistency with state requirements and the findings related to housing element requirements in 2025 Growth Management Hearings Board (GMHB) cases.

Section I: Comprehensive Plan Elements

Land Use Element

Consistent with countywide planning policies (CWPPs) and [RCW 36.70A.070\(1\)](#), amended in 2023

	Consistent? Yes/No	Changes needed?
<p>b. A future land use map showing land uses, city limits and UGA boundaries. RCW 36.70A.070(1) amended in 2023 and RCW 36.70A.110(6), WAC 365-196-400(2)(d), WAC 365-196-405(2)(b), (c) and (f)</p> <p>The land uses must reflect 20-year projected growth including future housing needs.</p>	YES	
<p>d. A consistent population projection throughout the plan which should be consistent with the jurisdiction’s allocation of projected countywide population and housing needs. RCW 36.70A.070 (preamble), RCW 36.70A.115, RCW 43.62.035 and WAC 365-196-405(2)(f)</p> <p>Table or other documentation of local allocation of population and housing needs from the countywide process that is consistent with the growth in the housing element.</p>		<p>YES</p> <p>See Draft Housing Element Table HO-1 for allocation of housing needs.</p> <p>See Draft Introduction Chapter Tables IN-1 & IN-2 (end of chapter) for 2044 population & employment targets and capacity. These targets also referenced in Draft Land Use Element Goal LU-1, Policy L U 1.1. Draft Preferred Alternative Land Capacity Analysis (LCA) Citywide and within Winslow Subarea describe 2044 DU, population and employment capacity of the City’s draft preferred alternative.`</p>
<p>e. Estimates of population densities and building intensities based on future land uses and housing needs. RCW 36.70A.070(1) amended in 2023 and WAC 365-196-405(2)(b), (c) and (f)</p> <p>Estimates in the land use element or land capacity analysis should include assumed densities to accommodate housing needs. (See WAC 365-196-210(7))</p>		<p>YES</p> <p>See Draft Winslow Subarea Land Capacity Analysis and Draft Citywide Land Capacity Analysis. NOTE: both City specific LCA methodology sometimes refers to the 2021 Kitsap County Buildable Lands Report.</p>

Housing Element

New legislation substantially amended the housing-related provisions of the Growth Management Act (GMA), [RCW 36.70A.070\(2\)](#). Local governments should review local comprehensive plan policies and countywide planning policies to be consistent with the updated requirements. Please refer to [Commerce’s Updating GMA Housing Elements webpage](#) for further information.

	Consistent? Yes/No	Changes needed?
<p>a. Goals, policies and objectives for:</p> <ul style="list-style-type: none"> the preservation, improvement and development of housing, RCW 36.70A.070(2)(b), and moderate density housing options including, but not limited to, duplexes, triplexes, and townhomes, within an urban growth area boundary. RCW 36.70A.070(2)(b) amended in 2021 and WAC 365-196-410(2)(a) <p>Ensure there are policy(ies) on a variety of moderate density housing types, such as duplexes, triplexes, and townhomes in urban growth areas.</p>	<p>YES</p> <p>Draft Housing Element Goals HO-1, HO-2, HO-3, HO-4, HO-5, HO-6, HO-8, HO-10</p> <p>Housing Element Policies HO 1.3, 1.5, 1.7, 1.9, 2.1, 2.2, Most Policies under Goals 3 & 4, 5.2, 6.1, 6.2, 6.3, 6.4, 6.9, 7.1, 8.1, 8.2, 8.3, 10.1, 11.2, 11.4</p>	
<p>b. Consideration of housing locations in relation to employment locations. RCW 36.70A.070(2)(d)(iii) amended in 2021 and WAC 365-196-410(2)(e)(v)</p> <p>Land use map should show higher density housing located near employment (commercial), centers, and/or adjacent to high quality transit if applicable, or include policies to support housing near employment and/or transit. (Housing Element Book 2: see pages 69-70.)</p>	<p>YES</p> <p>The City’s growth strategy (See Draft Land Use Element Goals 4 and 5 and supporting policies) does provide for higher residential densities within and adjacent to the City’s mixed use <i>designated centers</i>, particularly in the Winslow Subarea. and (to a lesser extent) the Neighborhood Centers. See DRAFT Housing Element Goals HO-4, 10 and Policies HO-3.12, 4.1, 4.2, 4.4, 4.9, 4.10, 9.7, 10.1, 10.2, 10.3</p>	
<p>c. Consideration of the role of accessory dwelling units (ADUs) in meeting housing needs. RCW 36.70A.070(2)(d)(iv) amended in 2021 and WAC 365-196-410(2)(e)(vi)</p> <p>To show consideration of ADUs, do one or both of the following:</p> <ol style="list-style-type: none"> The housing needs assessment or housing element must include text and/or policies that address the potential for ADUs to meet housing needs, OR Include ADU capacity in land capacity analysis. 20-year ADU capacity should not exceed 10% of eligible lots. TO SHOW CONSIDERATION OF ADUS, DO ONE OR BOTH OF THE FOLLOWING: <p>(See Housing Element Book 2 - ADU narrative guidance: pages 70-71; ADU capacity: see Step 1.6 on pages 29-30.)</p>	<p>YES</p> <p>The City has long allowed ADUs as accessory to single-family homes (see BIMC 18.09.030.I.5). ADUs are supported by Draft Housing Element Policies</p> <p>The City estimated ADU growth 2020-2044 in Step 8.4 of LCA. These future 231 ADUs are being included in the City’s planning for units serving households between 80%-120% AMI.</p>	
	Consistent? Yes/No	Changes needed?

<p>d. An inventory and analysis of existing and projected housing needs over the planning period, by income band, consistent with the jurisdiction’s share of countywide housing need, as provided by Commerce. RCW 36.70A.070(2)(a) amended in 2021 and WAC 365-196-410(2)(b) and (c).</p> <p>An inventory of existing housing and information on the affordability of different housing types, and table or other documentation of local allocation of housing needs by income level. (Housing Element Book 1: see #6 of “Minimum standards for identifying and allocating projected housing needs” on page 60.)</p>	<p>YES</p> <p>See Kitsap Countywide Planning Policy Appendix F for Projected Housing Needs by income band. The Land Capacity Analysis for the Draft Preferred Alternative in the Winslow Subarea includes a table with these housing needs (see page 2) and projected units by income band (see page 6).</p>
<p>e. Identification of capacity of land for housing including, but not limited to, government-assisted housing, housing for moderate, low, very low, and extremely low-income households, manufactured housing, multifamily housing, group homes, foster care facilities, emergency housing, emergency shelters, and permanent supportive housing. RCW 36.70A.070(2)(c) amended in 2021, WAC 365-196-300(4)(f), and WAC 365-196-410(2)(d)</p> <p>Statement and supporting data showing there is sufficient capacity of land for all income housing needs, including emergency housing. Include a table quantifying the estimated capacity of housing by income level compared to housing need allocations for all income levels, including emergency housing. (Supporting documentation of land capacity analysis is required in the housing element or an appendix.) (Housing Element Book 2: see bottom table of Exhibit 16 and 17 on pages 39 and 42, and Exhibit 20 on page 50.)</p> <p>Any limitations on STEP housing types (emergency shelter, transitional housing, permanent supportive housing, and emergency housing) must allow the siting of a sufficient number of units and beds necessary to meet projected needs. (Housing Element Book 2: see pages 43-50.)</p> <p>The zoning map and development regulations must be consistent with and implement the land use map and land capacity findings. (See RCW 36.70A.115(1), WAC 365-196-800)</p>	<p>YES</p> <p>See Kitsap Countywide Planning Policy Appendix F for Projected Housing Needs by income band. The Land Capacity Analysis for the Draft Preferred Alternative in the Winslow Subarea includes a table with these housing needs (see page 2) and projected units by income band (see page 6).</p> <p>See also Commerce Development Regulation Checklist and proposed updates to development regulations (Title 18 <i>Zoning</i>) for clarifying updates to better enable STEP housing production.</p>

	Consistent? Yes/No	Changes needed?
<p>f. Adequate provisions for existing and projected housing needs for all economic segments of the community, including documenting programs and actions needed to achieve housing availability including gaps in local funding, barriers such as development regulations, and other limitations. RCW 36.70A.070(2)(d) and (d)(ii) amended in 2021, WAC 365-196-010(1)(g)(ii), WAC 365-196-300(4)(f), and WAC 365-196-410(2)(e)</p> <p>Include a list of local barriers to affordable housing development, including barriers to emergency housing and permanent supportive housing. (Housing Element Book 2: see pages 51-62 and Appendix B.)</p> <p>Include a list of local actions needed to remove barriers to affordable housing development. (Housing Element Book 2: see page 63-68 and Appendix B; Commerce’s Housing Action Plan (HAP) guidance, Chapter 4: Guidance for Developing a Housing Action Plan.)</p> <p>Include an estimate of the number of housing units that need subsidies and/or incentives and the amount of funds that are needed to develop these units. Identify potential local funding sources for these housing needs. (Housing Element Book 2: see page 33-37, 60-62, 65-66, 125-126, and Appendix B, Exhibit 5.)</p> <p>Note: Identification of local barriers to affordable housing, actions to remove barriers, and potential funding sources do not need to be in table format, but all items need to be present in the housing element.</p>		<p>YES, See attached list of “Barriers” and “Gaps” documentation utilizing Commerce Book 2 Guidance. The City completed a Housing Action Plan in 2023 (linked below), which has informed this work on the Comprehensive Plan periodic update. https://cityofbainbridgeisland.civilspace.io/en/projects/housing-action-plan</p>
<p>g. Identify local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing, including:</p> <ul style="list-style-type: none"> • Zoning that may have a discriminatory effect; • Disinvestment; and • Infrastructure availability <p>RCW 36.70A.070(2)(e) new in 2021 and WAC 365-196-410(2)(f)</p> <p>Include local data on racially disparate impacts, exclusion, and displacement. Note: Commerce has data available for all jurisdictions on our EZView site. (Housing Element Book 3: see pages 19-26.)</p> <p>Demonstrate analysis and review of housing element policies and regulations that have led to these impacts. This may be in the housing element or appendix. (Housing Element Book 3: see pages 33-36; this specific evaluation framework is not required.)</p>		

	Consistent? Yes/No	Changes needed?
<p>h. Establish policies and regulations to address and begin to undo racially disparate impacts, displacement, and exclusion in housing caused by local policies, plans, and actions. RCW 36.70A.070(2)(f) new in 2021 and WAC 365-196-410(2)(f)</p> <p>Include policies to address and begin to undo these impacts, or that address all of the following: development of more affordable housing, preservation of existing affordable housing, <u>and</u> protection of existing households. (Policies: Housing Element Book 3, see pages 36-41 and Appendix C of Housing Element Book 2; Regulations: Housing Element Book 3, pages 43-44; Details and examples of polices and regulations in Housing Element Book 3, Appendix D, pages 107-125.)</p>	<p>YES,</p>	<p>The City is proposing new Housing Element Goal 11 and Policies HO 11.1-11.5 to support continued addressing of racially disparate impacts. With this update to the City’s Comprehensive Plan periodic update and update to the Winslow Subarea Plan, the City is planning to increase multifamily zoning densities and affordable housing programs to promoted the development of affordable housing.</p>
<p>i. Identification of 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) new in 2021 and WAC 365-196-410(2)(f)</p> <p>Discussion and/or map of areas that may be at risk of displacement. (Commerce and the Puget Sound Regional Council (PSRC) have maps available, and inclusion of one would meet this requirement.) (Housing Element Book 3: see pages 27-31.)</p> <p>Establish 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. RCW 36.70A.070(2)(h) new in 2021 and WAC 365-196-410(2)(f)</p> <p>Include anti-displacement policies and policies that protect existing households and communities when development occurs. (Policies: Housing Element Book 3, see pages 36-41 and Appendix C of Housing Element Book 2; Details and examples of polices and regulations in Housing Element Book 3, Appendix D, pages 107-125; Anti-displacement policies from Housing Action Plans)</p>	<p>YES.</p>	<p>The City is proposing new Housing Element Goal 2 and Policies HO 2.1 and 2.2 to address displacement of naturally occurring affordable housing, initially identifies by the City’s 2023 Housing Action Plan.</p> <p>The City of Bainbridge Island is identified as having a “LOWER” risk of displacement on the PSRC map at this time.</p>

Consistency is required by the GMA

	Consistent? Yes/No	Changes needed?
<p>b. All plan elements must be consistent with each other. RCW 36.70A.070 (preamble) and WAC 365-196-500</p> <p>Ensure capital facilities, transportation and utilities elements include improvements to support added housing density and consider underserved areas. Likely considerations will include system improvements and prioritizing and funding this work. (Housing Element Book 2: see LCA Step 1.3 “Identify gaps in utility infrastructure and services” on page 24, and “Identify related infrastructure and service needs” on page 80.)</p>	YES	

Public Participation

<p>a. Plan ensures public participation in the comprehensive planning process. RCW 36.70A.020(11), RCW 36.70A.035, and RCW 36.70A.140, WAC 365-196-410(2)(f)(i)(A) and (B), WAC 365-196-600(3) provide possible public participation choices.</p> <p>The public participation plan should show efforts to engage vulnerable populations, overburdened communities, and those who may have been disparately impacted by housing policies. (Housing Element Book 3: see pages 15-19)</p>	<p>YES</p> <p>The City’s Comprehensive Plan and Winslow Subarea Plan Steering Committee made up of 3 City Councilmembers and 3 Planning Commissioners worked to ensure that the City’s community engagement for these projects (particularly for the Summer 2024 DEIS comment period) utilized an “Equity Lens” including specific outreach to formal and informal groups or networks. The Steering Committee and City Planning Staff were assisted with See pages 1-3 of the DEIS Outreach and Engagement Summary: https://cityofbainbridgeisland.civilspace.io/en/projects/2024-comprehensive-plan-periodic-update</p>
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Section II: Development Regulations

Must be consistent with and implement the comprehensive plan. [RCW 36.70A.040](#), [WAC 365-196-800](#) and [810](#).

Zoning Code

Note: Please review the full Development Regulations sections of the [Periodic Update Checklists](#), new 2025 housing laws in the [Washington State Housing Laws of 2019 through 2025](#), and guidance on Commerce’s [Planning for Housing](#) webpage.

For a personalized list of housing requirements applicable to your jurisdiction, see the [Housing Planning Requirements Tool](#), which can be downloaded here: [Housing Planning Requirements Tool](#).

	Consistent? Yes/No	Changes needed?
<p>a. Zoning designations are consistent and implement land use designations that accommodate future housing needs by income bracket as allocated through the countywide planning process. RCW 36.70A.070(2)(c) amended in 2021, RCW 36.70A.115</p> <p>Note: Zoning must reflect sufficient land capacity for all income housing needs, including emergency housing and permanent supportive housing.</p> <p>Zoning map and text must allow for the housing types and densities in the land capacity analysis, including permanent supportive housing, emergency housing and emergency shelter. These zoning changes must be complete with the periodic update. (RCW 36.70A.130(1)(a) and (5)(a)).</p>	YES	
<p>b. [FOR CITIES] Permanent supportive housing and transitional housing must be allowed where residences and hotels are allowed. Any limitations on occupancy, spacing or intensity of use must be connected to public health and safety and allow the siting of a sufficient number of units and beds necessary to meet projected housing needs. RCW 35A.21.430 new in 2021, RCW 35.21.683 new in 2021</p> <p>“permanent supportive housing” is defined in RCW 36.70A.030(33); “transitional housing” is defined in RCW 84.36.043(3)(c)</p> <p>[For cities] Review development regulations to ensure that permanent supportive housing and transitional housing are allowed in required zones, any restrictions must be connected to public health and safety, and must allow the siting of a sufficient number of units necessary to meet projected housing needs in the land capacity analysis. (Housing Element Book 2: see pages 43-50 and STEP Model Ordinance, User Guide and Best Practices Report pages 27-28)</p>	YES, STEP housing clarifications provided in draft code updates.	

	Consistent? Yes/No	Changes needed?
<p>c. [FOR CITIES] Indoor emergency shelters and indoor emergency housing must be allowed in any zones in which hotels are allowed, except in cities that have adopted an ordinance authorizing indoor emergency shelters and indoor emergency housing in a majority of zones within one mile of transit. Any limitations on emergency housing and emergency shelter must be connected to public health and safety and allow the siting of a sufficient number of beds necessary to meet projected needs. RCW 35A.21.430 new in 2021, RCW 35.21.683 new in 2021</p> <p>“emergency housing” is defined in RCW 36.70A.030(15); “emergency shelter” is defined in RCW 36.70A.030(16)</p> <p>[For cities] Review development regulations to ensure that emergency housing and emergency shelter are allowed in required zones, any restrictions must be connected to public health and safety, and must allow the siting of a sufficient number of beds necessary to meet projected housing needs in the land capacity analysis. (Housing Element Book 2: see pages 43-50 and STEP Model Ordinance, User Guide and Best Practices Report pages 27-28)</p>	<p>YES, STEP housing clarifications provided in draft code updates.</p>	
<p>d. Implement comprehensive plan and adequate provisions for all economic segments in the development regulations with the periodic update. RCW 36.70A.130(1)(a) and (5)(a), RCW 36.70A.070(2)(d) and recent Growth Management Hearings Board findings (Futurewise, Kian Bradley, and Trevor Reed v. City of Mercer Island, Case No. 25-3-0003, FDO (Aug. 1, 2025.) at 41).</p> <p>Development regulations must show changes to reflect the identified actions to remove local barriers in the adequate provisions section of the housing element with the periodic update.</p>		<p>YES, proposed code updates include increased bonus density for voluntary inclusionary zoning in most mixed use zones, and additional code changes to further encourage deeply affordable housing projects (see updates to BIMC Chapters 18.12 and 18.21).</p>

Section III: Additional Housing Accountability Act Requirements (HAA jurisdictions only)

Must be consistent with requirements in RCW 36.70A.835(7)(a)(i), (iii), (iv) and (v)

In addition to the Expanded Housing Element Checklist and the HAA Development Review Checklist, HAA Voluntary and Selected Review jurisdictions must also be consistent with the following requirements.

	Consistent? Yes/No	Changes needed?
<p>a. The housing planning goal set forth in RCW 36.70A.020(4). (RCW 36.70A.835(7)(a)(i))</p> <p>The housing element should be consistent with the housing goal in the Growth Management Act, including:</p> <ul style="list-style-type: none"> Plan for and accommodate housing affordable to all economic segments of the population of this state, Promote a variety of residential densities and housing types, and Encourage preservation of existing housing stock. 	YES, see Housing Element notes above.	
<p>b. Any relevant rules adopted by the department. (RCW 36.70A.835(7)(a)(iii))</p> <p>The housing element should consider the advisory guidance in WAC 365-196, including WAC 365-196-325, WAC 365-196-410, and others that align with the housing planning work.</p>	YES	
<p>c. Any relevant state environmental policy act requirements in chapter 43.21C RCW. (RCW 36.70A.835(7)(a)(iv))</p> <p>The housing element should align with State Environmental Policy Act (SEPA) requirements, including environmental review, and use SEPA tools to implement housing element goals.</p>		A DEIS was completed in July 2024, and a FEIS will be completed with the final updates to the Comprehensive Plan and Winslow Subarea Plan.
<p>d. The county's or city's comprehensive plan. (RCW 36.70A.835(7)(a)(v))</p> <p>The housing element should be internally consistent with the whole comprehensive plan (RCW 36.70A.070 – preamble). Although not required under RCW 36.70A.835(7), housing elements must also be consistent with countywide planning policies and multicounty planning policies (RCW 36.70A.210).</p>	YES	