



Planning & Development Services

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Public Comments on Preliminary Amendments to Housing Element

Count	Last Name	First Name	Organization/ Address	Comment Method	Date Received
1	Fohn	Michael		Email	07/31/2024
2	Day	Angela	Planning Commission	Email	08/20/2024
3	Hayko	Tom		Email	08/22/2024
4	Messinger	Chuck	Volunteers of America	Email	09/11/2024
5	Fohn	Michael		Email	09/12/2024
6	Krueger	Morgan	WDFW	Email/PDF	09/19/2024
7	Nguyen	Jessica	Mount Vernon, WA	Email	09/17/2024
8	Doran	Molly	Skagit Land Trust	Email	09/18/2024
9	Trohimovich	Tim	Futurewise	Email	09/18/2024
10	Diephuis	Liam		Email	09/18/2024
11	Good Rubenstein	Kim	Skagitonians to Preserve Farmland	Email	09/18/2024
12	Dugan	Andy	Skagit Legal Aid	Email	09/19/2024

Tara Satushek

From: Michael Fohn <michael@fohn.co>
Sent: Wednesday, July 31, 2024 12:49 PM
To: Robby Eckroth; Tara Satushek
Subject: Housing Affordability

Robby and Tara,

Thank you for the phone call this morning. I will give my comments regarding the survey a rest.

You are correct that I do have a personal interest in seeing an increase in the land available of industrial development near the Skagit Regional Airport. Much of the undeveloped land is held by a limited number of owners, including the Port of Skagit County, Paccar, and a private landowner. In addition, much of the undeveloped lands are wetlands. There is very limited subdivided light industrial land (one to five acre lots), for smaller private companies to build improvements on for businesses employing 5 to 25 employees. Like housing, many small business owners are finding it difficult to afford the facilities need for their businesses.

Increasing the Bay View Industrial Land UGA would be an important, but small cog in the bigger strategy of increasing the strength of Skagit County employment opportunities. New employment opportunities within in an expanded UGA would likely be several years into the future. Planning for these opportunities needs to occur now, not in ten years from now.

A few thoughts regarding housing affordability.

General comment:

1) While housing affordability is a complex, multifaceted challenge, the root concept can be presented in simple mathematic formula:

Housing cost divided by household income equals a percentage. If the percentage is less than 30% the housing is defined as affordable.

Example: If housing cost (3-bedroom apartment) is \$ 2,000 per month, then a household of two adults and two children needs a take home household income of \$ 80,000 per year for their housing cost to be 30%. $\$ 80,000 \times 30\% = \$ 24,000 / 12 \text{ months} = \$ 2,000$.

To have take home pay of \$ 80,000 per year, the household would need a gross income of approximately \$ 90,000 to \$ 100,000, or combined hourly wages of \$ 45 to \$ 50 per hour for 2,000 per year.

The majority of the discussion relating to housing affordability focuses on the cost of housing, and while a significant component, there are only marginal gains that can be made in reducing the cost of housing. Development standards and government regulations drive much of increases in housing costs and there is limited opportunity to make changes to these.

The other part of the equation above, household income, has more opportunities for changes. Education, training, internships can all lead to increasing household income. But these are likely best left to others. County government can impact household income by providing opportunities to recruit mid and upper wage paying companies to Skagit County.

Comp Plan policies that promote mid and higher paying employers in Skagit County are needed.

Strengthening the skill sets of Skagit County residents is an important part of solving housing affordability.

Specific Comments:

- 1) Policies that promote and encourage ADU's should be adopted that:
 - A) Allow ADU's of a size that would house Two adults or a single parent and two children.
 - B) Allow the size (footprint) of the ADU to be the lesser of
 - up to 50% of the primary residence,
 - 40% of lot coverage.Larger ADU's on larger rural lots should be allowed
 - C) Allow more flexibility regarding the location of ADU's. On larger lots, ADU should be allowed to be built where owner desires.
 - D) Allow more than one ADU on larger lots. Possibly two ADU's on 20 acre or larger lots.
 - E) Allow incentives for construction of ADU's. Possibly RE Tax credits if occupied by elderly or disadvantaged.

- 2) Increase density in existing zones. Four homes per 10 acres, would not look much different than 2 homes per ten acres. Five acres is too large to mow and two small to economically farm. 2.5 acre lots would maintain a rural feel and allow more residential development to occur in area's already developed, relieving pressure on other resources.

Allowing 5-acre parcels to be divided into two 2.5 acre lots would likely increase the supply of building lots in the rural areas at lower cost than newly developed 5-acre tracts.

- 3) In Skagit County the cost of housing outside of city UGA's is very expensive. This is due, in part, to the culture of the residents of Skagit County preferring to live in SFR in a rural setting. In Skagit County more than 20% of residents prefer this lifestyle. The lack of development land due to State mandates drives up the cost of non UGA housing.

Solutions to this quality of live, cultural preference, are very limited. It is difficult for parents to not be able to provide the quality of life to their children that they have enjoyed.

Possibly there could policies be that allow families to build multiple homes on larger parcels.

- 4) Other housing solutions that increase the number of people per parcel should be considered. I do not have a working knowledge of these options, so it likely best I leave that discussion to others, but I would encourage consideration of these housing options.

Again, Thank you for your time this morning. I hope you find my comments helpful.

Mike Fohn
360-708-0245



SKAGIT COUNTY 2025 COMPREHENSIVE PLAN UPDATE

August Planning Commission to Discuss Preliminary Draft Policies





Meeting Objectives

- Provide a project overview
- Provide approach to policy development
- Discuss policy approach for housing
- Review and discuss preliminary draft policy amendments for the Land Use, Housing, and Economic Development Elements
- Questions and early feedback from the Planning Commission

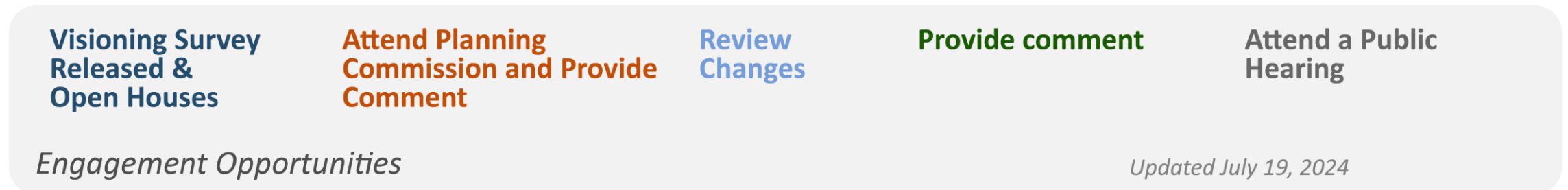
Project Overview





Project and Schedule Overview

- Project is nearing completion of data collection and analysis and moving on to policy drafting.



Updated July 19, 2024



Preliminary Policy Drafting Schedule

- Visit <https://skagitcounty.net/2025cpa> to learn about how to provide public comment.
- Email pdscomments@co.skagit.wa.us with the proposal name “Skagit County’s Comprehensive Plan Draft Policies” in the subject line. Include your comments in the body of your email.

Topic	Planning Commission – Preliminary Review	Comment Period	Planning Commission Second Review
Land Use Housing Economic Development	August 20, 2024 (revised)	8/20/2024 to 09/19/2024 4:30 p.m. (revised)	Early 2025
Transportation Capital Facilities, and Utilities	September 24, 2024	9/24/2024 to 10/24/2024 4:30 p.m.	Early 2025
Climate & Resiliency Environment	October 22, 2024	10/22/2024 to 11/14/2024 4:30 p.m.	Early 2025



Community Engagement Summary

- Visit <https://skagitcounty.net/2025cpa> to download the public participation program and community engagement reports.

Engagement	Completed On	Summary
First Community Survey	May 14, 2024	The first survey collected over strengths, weaknesses, and future focus areas for the County. Download the report online.
Pop-Ups	Ongoing	County staff participated in multiple community events to advertise the first survey, educate the public on the comprehensive plan process. Download the report online.
Stakeholder Interviews	July 10, 2024	The County hosted eight stakeholder interviews with groups focusing on agriculture, environment, housing, and economic development. Download the report online.
Open Houses	June 27, 2024	Open houses were completed at the end of June to educate the public and collect early feedback on specific topics. Download the report online.
Public Comment Periods	In Process	30-Day public comment periods will be included with every draft release of policies.
Climate Open House	Upcoming	Details will be provided at a later date.
Climate Survey	Upcoming	Details will be provided at a later date.

Policy Revision Approach





Approach

- Include new and/or revised policies which reflect the community voice
- Consistency with the Growth Management Act (GMA) and state law changes since last Comprehensive Plan update
- Consistency with Countywide Planning Policies
- Streamlining of policy language
- Use of active verbs to enhance readability and engagement
- Focus on creating “action” policies to provide direction for the future

Policy approach - housing





Housing within different Comprehensive Plan Elements

Housing Element:

Policies for quality, quantity, accessibility, affordability, and housing throughout the County.

Land Use Element

Policies focused on the general distribution of growth, including housing

Rural Element

Housing policies for LAMIRDs and other rural areas.



Land Use Element Preliminary Draft Policy Amendments



Land Use Policies

- Policies were revised to plan for housing at all income levels, incorporate state requirements for accessory dwelling units allowing at least two accessory dwelling units per lot, and a policy on annexation prioritization or phasing plans at it relates to utility expansions.

Key Recommendations

- Establishing new policies to plan for growth in UGAs in cities and unincorporated urban growth areas.
- Action Item: Coordinate with SCOG and the cities to explore options to provide housing in urban growth areas.





Housing Element Preliminary Draft Policy Amendments

Housing Policies

- Policies were revised to introduce new housing types, explore new programs for housing affordability, policies addressing anti-displacement, add clarity to policies to specify diverse housing needs for families, single-persons, people with disabilities.
- Included policies to allow a variety of housing in UGAs and LAMIRDs.

Key Recommendations

- Create a greater connection between the housing element and the rural element to explore housing solutions.





Economic Development Element Preliminary Draft Policy Amendments



Economic Development Policies

- The economic development policies have been revised to align with the goals in SCOG's Comprehensive Economic Development Strategy 2024-2029.
- Overall, policies were revised to promote key industry sectors, coordinate on land use with jurisdictions and regional plans, provide infrastructure to support businesses, and enhance workers' quality of life.

Key Recommendations

- Work to coordinate economic development across jurisdictions promoting a diverse economic landscape that bolsters the County's natural resource industries, and other key industries.
- Maintain and expand infrastructure especially for key industry sectors and small businesses.
- Focus on providing health and human services near job centers.



Angela Day Comments
Planning Commission Meeting August 20, 2024

Housing Element

Policy 7A-1 and first new proposed policy under housing affordability for all income levels

Based on Director Moore's comments at the July 13 meeting, perhaps this language needs further revision as the county may not be able to provide for the lowest AMI housing types which are better suited to urban areas.

Housing Affordability – 3rd new proposed policy

Promote homeownership through various programs such as education, technical support, self-help housing efforts, and working with financial institutions.

Question: How would this policy be funded and implemented?

2nd Question: Could this include promoting cooperative ownership of manufactured housing lots?

New Goal and Policy

Prevent discrimination, address displacement, and mitigate past harm in the development and maintenance of housing.

Question: How might this policy be implemented? What types of land use regulations would flow from this policy?

Land Use Element

General Question: The term patterns of development is used in new policy language in both the land use and housing elements. How is this term defined and how might it be implemented in code language?

2A-7

Allow residential development within **unincorporated** Urban Growth Areas at rural densities prior to the provision of urban infrastructure, provided that future development at urban densities is not precluded.

Question: Would allowing development within UGAs at urban densities help address housing availability? Once land is developed at rural densities, it may be more difficult to increase densities once annexed.

Also, this language in 2A-7 seems to conflict with Policy 2A-8.2 which may allow development at urban densities in cooperation with towns and cities.

Economic Development

Overall comment – the proposed changes in this section are excellent in my view. Support for resource based industries and those that complement those industries and quality of life in Skagit County are very thoughtful and clearly conveyed in these proposed changes.

Proposed new policy

Continue to identify barriers for small businesses in land use regulations and establish strategies to mitigate or remove barriers.

This is a welcome policy! Not sure how it will be implemented, but it seems important in order for small businesses to compete with mid- and large-scale businesses.

Tara Satushek

From: Tom Hayko <tomfhayko@gmail.com>
Sent: Thursday, August 22, 2024 6:09 PM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

I would like to see more private landowners with the ability to transform there property with adu projects with a more streamlined response instead of of a prolonged often confusing and difficult process that deters many from moving forward and depriving our community from building affordable housing for rental or extended family homes. Instead corporations are buying properties and often overbuilding and driving overpriced homes onto the marketplace. Thank you for your concern.

Sent from my iPhone

Tara Satushek

From: Chuck Messinger <cmessinger@voaww.org>
Sent: Wednesday, September 11, 2024 8:42 AM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

To Whom It May Concern,

I wanted to present some viable solutions worthy of consideration that have not as of yet been included in the county's comprehensive plan updates:

First we need to have documented incentivization policies for developers to build low-income housing, and it would be beneficial to have something documented in the comprehensive plan. There are local investors with land and intent but have not been presented with any financial solutions that would make building affordable housing beneficial for their business. Until such time as supply meets demand or there is some modicum of rent caps established we will not see a reduction in cost of housing. No one wants to tell a business owner they can't make money, or cap how much they can make. Mount Vernon has used the declaration of a housing emergency to move forward with their ADU development plans. This could be done on a county wide level, pursuant to RCW 84.52.105. A vote on a housing tax levy to support low-income development would be a viable opportunity to establish a financial groundwork to do this.

Second, the addition of the different housing types in the revision is a welcome addition. I would urge you to include short-term temporary housing solutions. I have not provided specific verbiage for these as the terms "shelter", "encampment" and "transitional housing" have time restrictions per HUDs definition of the terms. Providing safety and security in whatever form should not have time limits with our current lack of permanent solutions. Conversations have been had about the use of pallet homes, Conestoga Huts, and simple structures not designed for long-term use. These are non-permanent structures that can easily be moved and should not impact the county's obligations towards the Growth Management Act. If shelter can be produced in volume to address the immediate needs, and done so affordably, these should be documented options for consideration, and allowance for these structures on unincorporated land.

This does not mean that encampments need to be created. There are no non-profit or social service agencies that have the infrastructure to manage these. While we wait for funding and program development, here are some viable temporary housing solutions worthy of consideration:

- A single family home (SFH) in a rural or suburban community with sufficient land to accommodate could construct multiple non-permanent bedding structures that could utilize the SFH kitchen and bathrooms for communal use. Bedrooms could be utilized for office space to accommodate agencies providing services to clients that stay there. This option aligns with the communal living dynamic presented in HB 1998, but would afford more opportunities in a suburban or rural dynamic.
- Churches or Faith-Based organizations could host multiple non-permanent bedding structures and could potentially provide access to showers, kitchens, and food services depending on the

structure of the venue. These could be self-managed and tenants could be selected from their congregations if there was a need.

- The college or school districts could provide low cost temporary shelter on campus with ease of access to showers and restrooms.
- Farmowners could provide low-cost temporary shelters with access to services that would reduce the amount of permanent housing needed by the migrant farmworker community
- Business owners could host temporary housing structures to provide a safe and secure short-term solution for people relocating for job opportunities. These could also be used as a vocational training/housing pairing solution.

These are just examples of short-term housing solutions that could be considered. Whether it is an amendment to include pilot programs, or to have these types of structures defined in the comprehensive plan, it would help those that have alternative housing solution ideas get started. Short-term housing solutions are always going to be needed no matter the level of permanent housing inventory created. The progressive model that started with “First Step” was designed to initiate a model that provides housing variety, and the means for those experiencing chronic homelessness or those in need of additional supports to work towards self sufficiency with assistance, rather than being placed in permanent housing without the means to maintain it.

Thank you in advance for your consideration. I look forward to the near future where Skagit County has successfully provided safety and security for all of our citizens.



Chuck Messinger (he/him)
Program Manager, Skagit Coordinated Entry
Housing Services
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425-512-4105
301 Valley Mall Way Suite 110 | Mount Vernon, WA 98273

We acknowledge the stories, traditions, and living cultures of the Swinomish, Upper Skagit, Sauk Suiattle, and Samish peoples on this land and commit to building a brighter future together.

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Tara Satushek

From: Michael Fohn <michael@fohn.co>
Sent: Thursday, September 12, 2024 1:13 PM
To: PDS comments
Subject: "Skagit County's 2025 Comprehensive Plan Draft Policies"

Hello,

I have attended several of the 2025 Comp Plan Update open houses and related presentations to the Planning Commission and have followed the affordable housing topic closely.

Affordable housing is a multifaceted, complex issues with no simple solutions. The simplest solution would be to increase household income, but that is a complicated issue as well.

When talking about affordable housing, the AMI percentage is often mentioned and the primary focus is often on the lowering cost of housing in order to decrease the AMI percentage.

There is very little discussion regarding increasing household income as a means to decreasing the AMI percentage. More focus needs to be placed on strategies to increase household income. Such strategies could include concentrated efforts to attract higher pay jobs to Skagit County. Neighboring Counties to the north and south are rapidly adding higher paying jobs due to the policies they have in place, which include significant amounts of commercially developable zoned lands.

Giving a person fish can feed them for a day, teaching a person to fish can feed them for a lifetime.

While lowering the cost of housing can decrease the AMI percentage, it lowers the percentage for all income levels, not just the more than 50% AMI citizens. Broad policies that lower the cost of housing for all income levels might not be as beneficial as policies that are more targeted to specific households with AMI of greater than 30%. Such policies could include housing subsidies, real estate tax reductions, encouraging ADU's and other such policies.

Although likely unpopular to say, but likely true, lowering the cost of housing will likely attract more AMI challenged households to Skagit County, which will make the situation for current Skagit County residents even more challenging.

It will be interesting to follow the time and effort being expended in the 2025 Comp Plan Update to see if the policies revisions adopted improve the current affordable housing crisis for Skagit County residents.

Michael Fohn
P.O. Box 650
Burlington WA 98233



State of Washington

Department of Fish and Wildlife, Region 4

Region 4 information: 16018 Mill Creek Blvd, Mill Creek, WA 98012 | phone: (425)-775-1311

September 19, 2024

Robby Eckroth, Senior Planner
1800 Continental Pl
Mount Vernon, WA 98273

RE: Case # 2022-C-307, WDFW comments for Skagit County’s draft Housing and Land Use Comprehensive Plan elements

Dear Mr. Eckroth,

On behalf of the Washington Department of Fish and Wildlife (WDFW), thank you for the opportunity to comment on draft elements of Skagit County’s Comprehensive Plan as part of the current periodic update. Within the State of Washington’s land use decision-making framework, WDFW is considered a technical advisor for the habitat needs of fish and wildlife and routinely provides input into the implications of land use decisions. We provide these comments and recommendations in keeping with our legislative mandate to preserve, protect, and perpetuate fish and wildlife and their habitats for the benefit of future generations – a mission we can only accomplish in partnership with local jurisdictions.

Table 1. Recommended changes to proposed policy language.

Policy Number	Policy Language (with WDFW suggestions in red)	WDFW Comment
Housing (this version: link)		
7A-1.4	Ensure zoning and subdivision regulations provide for the efficient use of lands for residential development where appropriate to increase available land supply and opportunities for affordable housing to match the demographic and economic housing needs of the County’s current and projected population. Place development in appropriate	High-density development should be avoided in locations that provide significant ecosystem functions and services, such as areas that support wildlife habitat, water filtration, and climate resilience. By preserving these high-value ecosystems, zoning can ensure long-term environmental health, support biodiversity, and maintain natural services that benefit both the community and the environment. Prioritizing development in lower-value ecological areas can strike a balance between growth and

	locations with necessary infrastructure and amenities to support development while avoiding critical areas.	sustainability, ensuring that the benefits provided by healthy ecosystems are not permanently lost. Resources to help address this goal include WDFW’s Priority Habitats and Species (PHS) mapping information, which can be found on our website (link).
7A-1.5	Develop procedures to reduce impact fees and utility fees for low income or sustainable housing projects, when such fees are required.	<p>Incentivizing environmentally sustainable housing when building low-income housing is crucial for addressing both social and environmental challenges. Sustainable housing reduces carbon emissions, resource consumption, and enhances climate resilience, which is vital as climate change worsens. It also lowers long-term utility costs, benefiting low-income households disproportionately affected by rising energy bills. Additionally, these homes improve public health through better indoor air quality and reduced healthcare costs. Climate-resilient design protects communities from risks like flooding and extreme heat, ensuring long-term stability. By promoting sustainable housing, we can create equitable, resilient communities that meet both environmental and social needs.</p> <p>See the city of Issaquah, Shoreline, and Bellevue’s clean building incentive programs that aim to assist applicants in reaching energy efficiency standards.</p>
7B	Strive to preserve, conserve, and enhance the existing housing stock, including historic structures and sites; develop design guidelines and standards to improve the quality of new housing consistent with applicable building codes; and incentivize green building or sustainable building standards.	See comment above. We suggest requiring these standards to the greatest extent feasible in order to meet salmon recovery (RCW 36.70A.172), energy efficiency , and other state requirements.
7B-1.3	Establish development standards and design guidelines for Urban Growth Areas, Rural Villages, and large CaRD developments, to promote efficient, pedestrian-friendly, wildlife conflict-conscious, and attractive communities.	As population densities increase, it is crucial to plan for wildlife movement now in order to avoid major conflict in the future, especially in rural areas that are in close proximity to urban areas or in areas slated for future growth. We recommend that projects that plan for pedestrian or bicycle movement also plan for wildlife movement in tandem. For additional resources, see The Washington Wildlife Habitat Connectivity Working

		Group , WSDOT’s Reducing the risk of wildlife collisions website as well as Wildlife Habitat Connectivity Consideration in Fish Barrier Removal Projects , Montana Fish, Wildlife, and Parks’ How to Build Fence with Wildlife in Mind , and WDFW’s website .
Land Use (this version: link)		
2A-1.1	<p>Work with local jurisdictions to designate and maintain Urban Growth Areas (UGAs) of sufficient size to accommodate the County’s 20-year urban population and employment allocations. Areas proposed for UGA designation shall meet the following criteria:</p> <p>(f) shall consider future climate-related hazards, avoiding areas with current and projected hazard potential.</p>	<p>Skagit County is particularly vulnerable to climate-related hazards, especially flooding, due to its low-lying areas and proximity to water bodies like the Skagit River and Puget Sound. Climate change is expected to increase the frequency and intensity of flooding, putting people, property, and infrastructure at risk. Rising sea levels and storm surges could also affect coastal areas, leading to long-term damage. Without considering these hazards, UGA expansions may place future developments in flood-prone areas, resulting in costly consequences. Additionally, Skagit County’s agricultural sector, a key part of its economy, could be severely impacted by increased flooding. By accounting for these risks in land use planning, the county can protect vulnerable populations and ensure resilient, sustainable growth. This aligns with Washington State’s Growth Management Act and sets a standard for proactive climate adaptation.</p> <p>For assessing future conditions, see Climate Mapping for a Resilient Washington, as well as FEMA’s Resilience Analysis and Planning Tool (RAPT) for resources in visualizing these hazard areas.</p>
2A-4.1	<p>Joint planning should consider issues including, but not limited to:</p> <p>(g) Watershed scale recovery</p>	<p>Skagit County should prioritize watershed-scale recovery as a key factor in cross-jurisdictional planning for several critical reasons, particularly tied to salmon recovery and ecosystem health. Watersheds transcend political boundaries, meaning that effective planning must consider the larger ecosystem context to avoid unintended downstream impacts. This is especially important in Skagit County, as:</p> <ul style="list-style-type: none"> • Skagit County contains portions of WRIAs 3 and 4, which are essential for salmon

		<p>recovery efforts, including for Chinook, steelhead, and bull trout. These watersheds provide crucial spawning and rearing habitat for salmon species that are federally listed as threatened under the Endangered Species Act (ESA).</p> <ul style="list-style-type: none"> • The Skagit Watershed Salmon Recovery Plan emphasizes the need for coordinated efforts across jurisdictions to address habitat restoration, water quality, and flow conditions critical for salmon survival. This plan calls for actions such as floodplain restoration, wetland protection, and barrier removal, all of which require coordination beyond a single jurisdiction’s boundaries to achieve meaningful results. • The Puget Sound Partnership Action Agenda and the NOAA Chinook Recovery Plan identify Skagit County’s watersheds and habitat features as critical focuses for salmon recovery, meaning that successful coordination across jurisdictions can unlock state and federal funding for habitat restoration projects. Cross-jurisdictional cooperation can ensure that recovery plans are implemented in a way that addresses the specific needs of local watersheds while maximizing access to these resources.
2A-6.2	<p>Adopt plans, policies, codes, and development standards that promote public health by increasing opportunities for residents to be more physically active. Such actions include: concentrating growth into Urban Growth Areas, promoting more compact urban development, allowing mixed-use developments, and adding pedestrian and non-motorized linkages where appropriate and where multi-benefit outcomes are most likely, such as habitat corridors that offer recreational benefits.</p>	<p>As Skagit County transitions from rural to more developed, preserving wildlife habitat corridors is crucial to maintain biodiversity and ensure species can move freely between habitats, especially as climate change impacts their environment. These corridors prevent habitat fragmentation, supporting species like salmon and elk, while also promoting ecosystem services like water filtration and flood control. Integrating wildlife corridors with pedestrian trails offers multi-benefit solutions, providing recreational opportunities for residents and enhancing community engagement with nature. These green spaces can also increase property values and attract eco-tourism, offering economic and social advantages. By planning for both ecological and human needs, Skagit County can promote sustainable development and climate resilience.</p>

2A-8.5	Any subdivision of land under these regulations shall include measures to ensure wildlife habitat corridors are not further degraded and fragmented, as well as ensure the accommodation of future rights-of-way for urban transportation infrastructure and utilities that will be required when the property is further subdivided and developed at urban densities and land uses.	See comment above. Wildlife corridors should be considered in tandem with transportation planning to reduce habitat fragmentation caused by roads and infrastructure, which can isolate wildlife populations and disrupt migration routes. Integrating wildlife crossings, such as underpasses or overpasses, can prevent vehicle-wildlife collisions, ensuring safer roadways and preserving biodiversity. For resources, see comments in relation to 7B-1.3 above.
2B	Recognize the important functions served by private and public open space, designate and map public open space of regional importance, and designate open space corridors within and between urban growth areas.	We greatly appreciate the focus of this policy on connecting open spaces within corridors. These corridors have the ability to provide multiple benefits, serving both pedestrian recreational needs and creating vital habitat linkages.
2G	Allow for the orderly division of land by providing for the creation of new lots meeting the dimensional standards of the zoning district in which the lots are located. Encourage innovative land division techniques, such as cluster or conservation subdivisions as well as Transfer of Development Right programs , as an alternative to traditional land division practices. These techniques allow flexibility in design and provide for better preservation of critical areas, natural resource lands and rural character.	Cluster or conservation subdivisions are important because they concentrate development in smaller areas, preserving critical ecosystems and open spaces, which protect biodiversity and provide natural stormwater management. Transfer of Development Rights (TDR) programs allow for the preservation of ecologically sensitive areas by shifting development potential to areas better suited for growth, helping maintain large, contiguous areas of natural land. Both techniques balance development with environmental protection, ensuring that critical ecosystems remain intact while accommodating necessary growth. These methods help to protect vital ecosystem services like water filtration, flood control, and habitat preservation. Resources include King County's TDR program , Island County's Conservation Subdivision ordinance (17.03), and Snohomish County's rural cluster subdivision program (municipal code link , fact sheet link). See WDFW's Landscape Planning for Washington's Wildlife for similar recommendations and resources.
2G-1.5	Place conservation easements or conditions/covenants/restrictions (CCRs) for a specified period of	CaRDs often involve flexible lot size standards in order to provide methods for increased density while protecting certain land designations. In the

	time when CaRD land divisions are approved for Long CaRDs	case of open spaces and critical areas, we recommend these lands are required to be connected and set aside into perpetuity to ensure future development does not further degrade these areas.
2H-1.2	The County must use regulations and procedures to identify and site essential public facilities: (d) The state or local government proposing to site an essential public facility must outline how climate-related hazards will be avoided	Given that public infrastructure represents significant public investments, it is prudent to ensure that structures and roads are designed and sited to be resilient to climate impacts. Local governments should identify climate impacts predicted for their communities and review their transportation plans in the context of climate change projections to ensure that planned expansions, additions, and retrofits will be resilient throughout their intended lifespan and make changes as needed. For assessing future conditions, see Climate Mapping for a Resilient Washington , as well as FEMA’s Resilience Analysis and Planning Tool (RAPT) for resources in visualizing these hazard areas.
2H-1.7	The applicant for a proposed essential public facility must provide justification for the location of the facility based upon anticipated need and the service area, as well as consider future climate-related hazard projections.	See comment above.

Please see the [Sound Choices Checklist](#) for additional guidance for all elements of the Comprehensive Plan.

Thank you for taking the time to consider our recommendations to better reflect the best available science for fish and wildlife habitats and ecosystems. We value the relationship we have with your jurisdiction and the opportunity to work collaboratively with you throughout this periodic update cycle. If you have any questions or need our technical assistance or resources at any time during this process, please don’t hesitate to contact me or our Regional Land Use Lead, Morgan Krueger (morgan.krueger@dfw.wa.gov).

Sincerely,



Timothy Stapleton
Washington Department of Fish and Wildlife
Region 4 – Habitat Program Manager

CC:

Morgan Krueger, Region 4 Land Use Lead (morgan.krueger@dfw.wa.gov)
Kara Whittaker, Land Use Conservation and Policy Section Manager (Kara.Whittaker@dfw.wa.gov)
Marian Berejikian, Environmental Planner (Marian.Berejikian@dfw.wa.gov)
Marcus Reaves, Assistant Regional Habitat Program Manager (marcus.reaves@dfw.wa.gov)
Alex Richard, Habitat Biologist (alex.richard@dfw.wa.gov)
Region 4 Northern District (R4NPlanning@dfw.wa.gov)
Lexine Long, WA Department of Commerce (lexine.long@commerce.wa.gov)

Tara Satushek

From: Jessica Davey <j.a.nguyen@hotmail.com>
Sent: Tuesday, September 17, 2024 3:33 PM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies- Housing

Jessica Nguyen

19526 E. Hickox Rd

Mount Vernon, WA

I am writing to express my support for policy changes that aim to address the growing issue of affordable housing in our community. As a local mortgage loan officer and an engaged community member, I see firsthand the impact that current housing market conditions are having on our residents.

According to 2024 data from HUD, the average median income in Skagit County is approximately \$82,000. The borrowing power at this income level would be about \$425,000. Far short, of the average home price that is \$600,000+ in Skagit County. This stark disparity underscores a critical challenge: many residents are struggling to find housing that is both affordable and accessible.

To address this issue effectively, I urge the Commission to consider supporting alternative housing types and revisiting certain zoning regulations. Specifically:

1. Embracing diverse housing options such as duplexes, triplexes, tiny homes, and ADU's can significantly contribute to increasing affordable housing availability. These alternatives not only provide more affordable options but also enhance the variety of living spaces within our community.
2. Modifying zoning regulations to permit smaller lot sizes can help reduce the overall cost of housing. Smaller lots can lower construction costs and, in turn, make housing more attainable for a broader range of income levels. The land cost is single-handedly the most expensive portion of any build project (I on average see 30%+ of overall project cost). If we can get smaller lots, it is the most efficient way at reducing the cost of construction.
3. Reevaluating and potentially relaxing setback requirements can facilitate the development of smaller and more affordable homes. By enabling more efficient land use, we can help mitigate the high costs associated with new home construction.
4. I would also ask that use of UGA's be further considered. These area's typically boarder the city limits and there is usually good utility access for construction. If there are smaller lots, and easy access to utilities, this further reduces the cost of construction.

The current conditions highlight that traditional single-family home construction is becoming increasingly untenable for many prospective homeowners. Without changes to zoning and development policies, we risk exacerbating the housing affordability crisis and limiting the opportunity for many residents to secure stable and affordable housing.

I strongly encourage the Planning Commission to consider these recommendations as part of a broader strategy to enhance housing affordability and meet the needs of our community. By making these adjustments, we can work towards creating a more accessible housing market for all residents.

Thank you,

Jessica

Tara Satushek

From: Molly Doran <mollyd@skagitlandtrust.org>
Sent: Wednesday, September 18, 2024 1:17 PM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies, Skagit Land Trust comments

Comments on Skagit County Comprehensive Plan Housing, Land Use, and Economic Development Elements

Submitted on behalf of Skagit Land Trust by:
Molly Doran, Executive Director Skagit Land Trust; 1020 S 3rd Street, Mount Vernon, WA 98273

Thank you for the opportunity to comment on preliminary policy revisions to the Skagit County Comprehensive Plan Housing, Land Use, and Economic Development Elements.

Skagit Land Trust conserves wildlife habitat, agricultural and forest lands, scenic open space, wetlands, and shorelines for the benefit of our community and as a legacy for future generations. Our organization has over 1,700 family and business supporters (members) and 400 active volunteers who work to protect the most important and beloved places in Skagit County. Today, the Trust protects more than 10,000 acres, including more than 48 miles of shoreline.

Our comments draw from this mission and seek to ensure that the Skagit County Comprehensive Plan works to maintain the resilience of Skagit County's natural environment in the face of population growth and the impacts of climate change.

General Comments Regarding Housing, Land Use and Economic Development

Skagit Land Trust (the Trust) strongly supports efforts to increase affordable housing in Skagit County. The primary method for doing so should be to encourage growth in cities and towns, by making them highly livable, walkable, and desirable places to live, and by partnering with non-profit housing organizations and the private sector to offer a wide variety of affordable housing options.

The Trust supports amending the Countywide Planning Policies (CPPs) to encourage 90 percent of new residential growth to occur in the cities and their UGAs, rather than the current goal of 80 percent.

We do not believe the County should be looking at ways to increase development potential in the rural area, even if these increases are limited to Rural Villages and Rural Intermediate areas. The County and cities do not consistently achieve the CPP goal of 80 percent of new growth occurring in urban areas; increasing rural development potential would move us further from that goal.

Furthermore, with climate change, many of the factors that used to dictate where growth and development should go must be updated with greater emphasis on natural hazards and limited resources. Thus, things such as water supply, single source aquifers, flood plain hazards, forest fire hazards, erosion, landslides, and transportation routes in floodplains all need to be considered.

We believe there should be strong goals and policies in the Land Use Element that seek to avoid putting new development, whether through UGA expansions or the siting of potentially hazardous energy facilities, in hazardous or risk-prone areas.

Specifically, in regard to especially hazardous energy facilities, we would like to see a policy concerning the siting of energy infrastructure either in Land Use, or Utilities, or both, wherever it is better suited.

Siting of Energy Infrastructure

New energy infrastructure facilities, such as substations and BESSs, should only be allowed in climate resilient locations. These facilities should not be built in floodplains (or areas likely to become floodplains over time due to climate change) where spills or fires could contaminate waterways, nor close to forests to which fire could spread. They also should not be built in close proximity to residential areas where people would be in jeopardy from toxic gases and possibly be affected by prolonged loud noise from the fans needed to continuously cool the lithium-ion batteries.

While BESSs will be increasingly important as we rely more on wind and solar power, there's no perfect place to site them. Commercial and industrial areas out of the floodplain and away from residential areas would seem to be best. They do need to be adjacent to large substations, which severely limits the choices. But rather than building very expensive new energy facilities next to existing substations in high-risk locations, there should be planning to move substations to more suitable locations that carry fewer risks to human and environmental health.

To facilitate implementation of these goals and policies, the County should create a base map of the areas most vulnerable to climate change as part of the Comprehensive Plan Supplemental Map section. This should include sea level rise, river flooding, excessive fire danger, geologic hazard areas (landslides, alluvial fans, erosion areas), areas with infrastructure hazards/potential failure that will be at increased risk with climate changes.

Following are more specific comments on proposed amendments to goals and policies already in the Comprehensive Plan.

Housing Element

Goal 7C, Housing Distribution and Accessibility

While we support efforts to increase the variety of housing types in urban and rural areas, in an effort to make housing more accessible and more affordable, we do not support actions that increase densities in Rural Villages, other LAMIRDs, or the rural area generally. Additional density should only be added in cities and towns.

Policy 7C-1.3

Again, efforts should be made to make housing in LAMIRDs more accessible and affordable, without increasing rural residential densities.

Land Use Element

The land trust supports the following goals and policies regarding urban growth and urban growth areas:

- **Work with cities and towns to help them plan for and absorb more people, homes, and businesses.** Modify the population distribution goal so that 90% of new population growth is in urban areas (rather than the current 80% goal).
- **Encourage 20-minute neighborhoods.** 20-minute neighborhoods are places where residents have easy, convenient access to many of the places and services they use daily including grocery stores, restaurants, schools, and parks, without relying heavily on cars. Increasing the walkability of neighborhoods will reduce the county's carbon output.
- **Focus strongly on keeping growth in urban areas and making those urban areas livable.**

- Establish high thresholds for when cities and towns are allowed to expand their Urban Growth Areas (UGAs).
- Do not allow UGAs to expand into floodplain or critical areas.
- Have programs that purchase development rights around UGAs to contain development and provide green spaces, parks, and trails. Green spaces will also help absorb storm waters and keep urban areas cooler.
- Stop sprawl by outlawing Fully Contained Communities (FCC) in rural areas. FCCs increase GHG emissions as they contribute to increased vehicle use.

Goal 2-B, Open Space

We would like to see the following policies added under Goal 2-B, regarding Open Space.

- **Develop systems to preserve forests, wetlands, water and soils for natural carbon storage** as a way to reduce carbon emissions in the County.
 - Identify carbon sequestration as a compatible forestry practice for Open Space taxation.
 - Allow increased carbon storage (bio-char, etc.), including through mitigation programs, as compatible agricultural land uses for Open Space taxation.
- **Focus on connecting green spaces and wildlife corridors so wildlife can move freely as their habitat changes or is lost.**

New Policy Following Policy 2G-1.1

We would like to see a new policy, similar to Policy 2G-1.1 regarding conservation land divisions on Ag-RNL and Rural Resource-NRL, to facilitate conservation land divisions on Rural lands, including Rural Reserve and Rural Intermediate. The rationale is exactly the same as for the conservation policy related to the two resource lands mentioned above.

This would allow professional conservation organizations or government entities to purchase part of a property from a voluntary landowner for strict conservation purposes without going through the current arduous and expensive subdivision process. A conservation easement would be placed on the land purchased to ensure it was not developed. This is a win-win for adapting to climate change and for landowners who often want to keep the productive parts of their land, or move their home to a resilient location, but do not want to manage sensitive or increasingly hazardous excess acreage.

Economic Development Element

Policy 11A-4.2

EDASC is now the Economic Development Alliance of Skagit County, not Association. The policy should be corrected.

Goal 11E, Quality of Life

We object to the proposed removal of the words “sustainable natural resource industry,” “valued open space” and “environmental quality” from the goal relating to Skagit County’s quality of life. These are extremely valuable aspects of Skagit County’s quality of life that are emphasized by the public in the County’s own public opinion surveys related to the Comprehensive Plan update.

We propose adding the following new policies to the Economic Development Element:

- Develop additional trails to attract recreationists and eco-tourists (such as birders) increasing the county’s tourist economy without increasing the carbon footprint. Eco-tourism contributes over \$20 billion and

growing to Washington's GDP. Skagit County is uniquely positioned to capitalize on this trend with more tourist infrastructure such as trails and wildlife viewing sites.

- Consider boosting the County's eco-tourism economy by promoting the County's dikes as walking, bicycling, bird/wildlife watching paths.
- Encourage smaller "truck" farms on the edges of cities and towns through zoning incentives.

Tara Satushek

From: Tim Trohimovich <Tim@futurewise.org>
Sent: Wednesday, September 18, 2024 4:00 PM
To: PDS comments
Subject: RE: Skagit County's 2025 Comprehensive Plan Draft Policies
Attachments: CommerceReports_CSHD_FarmworkerHousing_Final_4.26.22.pdf

Dear Staff:

Enclosed please find the enclosure referenced in the earlier email.

Thank you again for considering our comments.

Tim Trohimovich, AICP
Director of Planning & Law
Futurewise
1201 3rd Ave #2200, Seattle, WA 98101
(206) 343-0681
tim@futurewise.org

From: Tim Trohimovich
Sent: Wednesday, September 18, 2024 3:58 PM
To: Skagit County PD&S Comments <pdscomments@co.skagit.wa.us>
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

Dear Staff:

Enclosed please find Futurewise's comments on the first drafts of the Land Use and Housing elements. Thank you for considering our comments.

Comments on the Comprehensive Plan Element: Housing First Draft

Policy 7A-1.8

RCW 36.70A.070 and RCW 36.70A.070(2) provide that Skagit County and the cities and towns in the county "shall include:"

"(2) A housing element ensuring the vitality and character of established residential neighborhoods that:
(a) Includes an inventory and analysis of existing and projected housing needs that identifies the number of housing units necessary to manage projected growth, as provided by the department of commerce, including:
(i) Units for moderate, low, very low, and extremely low-income households; and
(ii) Emergency housing, emergency shelters, and permanent supportive housing[.]"

While the county selects a total population projection that is within the State of Washington Office Financial Management projection range, the housing units needed by income category shall be identified "as provided by the" State of Washington Department of Commerce Housing for All Planning Tool (HAPT). Washington States

Department of Commerce, Local Government Division Growth Management Services, *Guidance for Updating Your Housing Element: Updating your housing element to address new requirements* on page 61 states “counties are required to use the HAPT to identify projected housing needs associated with their chosen countywide population target” These allocations include housing affordable to families earning a variety of categories in addition to the categories in Policy 7A-1.8. We recommend that Policy 7A-1.8 refer to the regional allocation from the HAPT with an emphasis on families earning less than 80 percent AML.

Policy 7E-1.1

The *Washington Farmworker Housing Needs Assessment* recommended that to provide more affordable farm worker housing cities should be encouraged “to increase zoning and infrastructure investments for multi-family housing within urban growth areas.” BERK Consulting, *Washington Farmworker Housing Needs Assessment* p. 184 (The Washington State Department of Commerce: Jan. 2022) last accessed on Feb. 18, 2024, at: https://www.commerce.wa.gov/wp-content/uploads/2022/04/CommerceReports_CSHD_FarmworkerHousing_Final_4.26.22.pdf and enclosed in a separate email with the filename: “CommerceReports_CSHD_FarmworkerHousing_Final_4.26.22.pdf.” The assessment also recommended that cities remove “barriers to the development of rental housing.” *Id.* “Encouraging cities to identify and remove barriers to rental housing development is an important strategy to address housing needs for farmworkers.” *Id.*

Consistent with these recommendations we recommend that Policy 7E-1.1 call for cities to plan and zone for more multifamily housing within urban growth areas and remove barriers. Policy 7E-1.1(b) should also be retained as it is consistent with these recommendations.

Comprehensive Plan Element: Land Use First Draft

Policy 2A-1.1

The second subsection (e) refers to the discretionary authorization in RCW 36.70A.130(3)(c) that allows swaps of land into and out of urban growth areas if certain criteria are met. It is not a criterion for designating urban growth areas and should be deleted from Policy 2A-1.1.

Policy 2A-1.2

The added “patterns of development” refers to the discretionary authorization in RCW 36.70A.130(3)(c) that allows swaps of land into and out of urban growth areas if certain criteria are met. It is not a criterion for designating urban growth areas and should be deleted.

Policy 2A-4.1

The added “(f) patterns of development in the UGAs” refers to the discretionary authorization in RCW 36.70A.130(3)(c) that allows swaps of land into and out of urban growth areas if certain criteria are met. It is not a criterion for designating urban growth areas and should be deleted.

Thank you for considering our comments. If you require anything else, please let me know.

Tim Trohimovich, AICP (he/him)
Director of Planning & Law



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STATE OF WASHINGTON
DEPARTMENT OF COMMERCE

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April 21, 2022

Dear Governor Inslee and Washington State Legislators,

Enclosed is the farmworker housing section of the consultant reports fulfilling the proviso from the 2020 capital budget:

\$200,000 of the appropriation in this section is provided solely for the department to contract for a study regarding both available and needed affordable housing for farmworkers and Native Americans in Washington state. The study must include data to inform policies related to affordable housing for farmworkers and Native Americans and supplement the housing assessment conducted by the affordable housing advisory board created in chapter 43.185B RCW.

As directed by state statute, Commerce contracted with Berk Consulting for the report on farmworker housing needs. Commerce contracted with Big Water Consulting, supported by the Urban Institute and Akana, for the report on housing needs for Native Americans.

Due to pandemic staffing issues and stakeholder engagement challenges, these reports were delayed for final review and approval by the agency and governor's office. This delay should not create negative perceptions about the important and timely work conducted by the consultants to engage and review the needs of these populations.

Despite the delay in publication, both consultants shared findings and summaries with the state Legislature and at the 2021 Housing Washington Conference.

The agency reviewed the recommendations produced by the consultants and stakeholders, and will consider these recommendations in future housing discussion and proposals.

Signed,

A handwritten signature in blue ink, appearing to read "Diane Klontz".

Diane Klontz
Assistant Director
Community Services and Housing Division
Department of Commerce



Washington Farmworker Housing Needs Assessment

January 2022

COMMUNITY SERVICES &
HOUSING DIVISION

Prepared by:
BERK Consulting

Acknowledgements

Many members of the farmworker community, as well as Commerce staff, participated and contributed to the preparation of the Needs Assessment. Their participation and contributions are appreciated.

Washington State Department of Commerce

Community Services and Housing Division
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Catholic Community Services

Gloria Velasquez Burton

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Jason Davidson, *Department of Commerce*
Jon Devaney, *Tree Fruit Association*
Bre Elsey, *Washington Farm Bureau*
Dan Fazio, *Wafra*
Kimberly Gierach, *Department of Health*
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Erin Porter, *Department of Health*
CaraMia Stearns-Vance, *Yakima Housing Authority*
Brett Valicoff, *Valicoff Fruit Co.*
Nona White, *Department of Commerce*

COFS Washington Study

The COFS Washington study is being developed by a broad coalition of researchers and community-based organizers from across California, Oregon, and Washington.

Washington Partners include:

Our Valley, Our Future
CIELO
Community to Community Development
CAFÉ
El Proyecto Bienstar Northwest Communities
Education Center (NCEC)/Radio KDNA

Organizations

Beacon Development
Washington State Housing Finance
Commission
Washington State Department of Commerce
Beacon Development Group
Employment Security Department
Washington Department of Health
Office of Rural and Farmworker Housing
Washington State Department of Agriculture

Washington Department of Commerce

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

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Executive Summary

Overview

Washington is home to 35,600 farm operations across 15 million acres of farmland producing crops and food, accounting for approximately \$20.1 billion in revenue. More than 300 agricultural commodities, including hops, cherries, apples, asparagus and raspberries, grant the state a global economic presence and employ tens of thousands of people. Thus, the Washington farmworker is a crucial link in the agricultural value chain. However, at an average of 40-60% of HUD-area Median Family Income (MFI), the average Washington state farmworker earns wages that often put decent, safe housing out of reach.

This report was developed for the Department of Commerce to help the Legislature understand and address the challenges of providing decent and affordable housing for farmworkers in Washington. This report meets the requirements related to farmworker housing in Sec. 1011 (9) of the [2020 capital budget](#):

\$200,000 of the appropriation in this section is provided solely for the department to contract for a study regarding both available and needed affordable housing for farmworkers and Native Americans in Washington state. The study must include data to inform policies related to affordable housing for farmworkers and Native Americans and supplement the housing assessment conducted by the affordable housing advisory board created in chapter 43.185B RCW.

The report summarizes funding available to develop farmworker housing, reviews agricultural work in Washington, estimates the current inventory compared with demand and makes preliminary recommendations to meet the challenge. All report findings and recommendations are based on publicly available employment and housing data and qualitative information gathered through engagement with stakeholders.

Housing Needs and the Farmworker Housing Supply Gap

Current estimates indicate there are 33,016 units of publicly-funded farmworker accommodations, compared to an estimated 102,304 total farmworkers in Washington. This means up to an estimated 69,288 farmworkers are competing in local housing markets for rental or ownership housing options when those markets provide few options.¹ There is a general housing affordability crisis and an extremely competitive housing market for low-income households statewide, especially in rural areas where agricultural work is primarily located. Farmworkers face additional disadvantages in the private market, including limited or no English proficiency, unfamiliarity with local housing customs, and inability to make upfront payments, such as deposits. These dynamics can force farmworkers to live in overcrowded or substandard rental housing.

From 2012-2018, statewide farmworker wages increased 19% while home values increased 52% and rent increased 57%.

Sources: Washington ESD, 2020; Washington Center for Real Estate Research, 2019.

The Washington farmworker population includes resident year-round workers, migrant workers and H-2A visa guest workers, who have different housing preferences and experiences in the housing market. Year-round workers often prefer to live in permanent housing with amenities like schools and churches and work near a single farm or a range of local farms, depending on the season. Temporary migrant workers often prefer to be close to, or even located on, their worksites. Federal law requires employers of H-2A visa workers to provide housing for their H-2A employees at no cost.² However, H-2A workers represent only about 12% of all farmworkers in Washington, so this guarantee does not apply to most of the state's farmworkers. Non-H-2A migrant workers are most likely to live unsheltered or in unsafe or unhealthy housing situations because flexible, temporary housing is unavailable in the private market.

Housing is inextricable from health, particularly for agricultural workers in the time of COVID-19. Much temporary farmworker housing is in a congregate style, sharing sleeping quarters and common areas, and farm work often requires physical proximity and shared surfaces. As a result of the COVID-19 pandemic and for the first time in U.S. history, farmworkers have been declared essential workers, permitting them to work even in areas where stay-at-home orders are in place.³ Where policies offer some protections to farmworkers, they often do not cover undocumented workers, who are the most vulnerable to losses of housing or employment and adverse health conditions.

¹ It is likely this estimate over counts the housing need, since publicly available data shows jobs instead of workers. See page 29 of the full report for discussion.

² [20 CFR 655.122\(d\)\(1\)](#)

³ Miriam Jordan, "Farmworkers, Mostly Undocumented, Become 'Essential' During Pandemic," *The New York Times*, (April 2, 2020), <https://www.nytimes.com/2020/04/02/us/coronavirus-undocumented-immigrant-farmworkers-agriculture.html>

Recommendations

During this study, farmworkers, employers and community organizations alike highlighted the need for improved farmworker housing access and affordability. Though federal, state and local programs are dedicated to ensuring affordable housing for farmworkers, farmworker housing production has not kept up with the growth in need.

Funding Recommendations

- **Evaluate increasing or restructuring funding for farmworker housing through the State Housing Trust Fund (HTF).** The HTF is a key resource for farmworker housing funding. Though the level of funding for farmworker housing has remained largely consistent since 1999, the total number of units and beds produced with those funds is lower in the last six years than in the program's first six years.
- **Establish a dedicated funding source for temporary housing.** Temporary units have higher operating costs and lower rents, which means that the private market is unlikely to build temporary housing for migrant workers. Establishing a dedicated funding source for temporary housing with a higher portion of funds available for maintenance and operations can alleviate temporary workers' challenges in local housing markets.
- **Implement the Joint Legislative Audit and Review Committee (JLARC) recommendation to retool the tax exemption for farmworker housing.** The exemption is not utilized to the extent it should be because its occupancy requirements differ from other funding sources. "Agricultural employee" is also defined differently for the exemption and other funding sources. This can limit housing providers that build farmworker housing from combining other funding sources with the exemption.

In addition, the Department of Revenue (DOR) has a policy restricting the use of seasonal farmworker housing developed using the exemption for other purposes at any time during the year. This creates a situation where housing providers are forced to restrict farmworker beneficiaries from taking non-farm work in certain seasons. Another regulation requires facility managers to reserve 25% of beds for walk-ins, but there is no clarity about who qualifies as a walk-in.
- **Advocate changes to the USDA that make it easier to combine Rural Development (RD) funding with other sources.** USDA RD funds are a key source for funding for farmworker housing development in rural communities. However, this funding requires strict financing and operating conditions that make it challenging to combine funds.
- **Evaluate the Housing Trust Fund allocation of funding to rural versus urban areas and consider offering support to rural communities in applying for funding.** The HTF legislation (RCW 43.185.050) establishes a statutory target of at least 30% of the funds in any given funding cycle be awarded for the benefit of projects located in rural areas

of the state, yet this target is not consistently met. More technical assistance to rural communities could help increase successful applications.

Housing Development Recommendations

- **Encourage cities to increase zoning and infrastructure investments for multi-family housing within urban growth areas.** Local regulations and discretionary processes tied to the approval of multifamily farmworker housing may create challenges for new development.
- **Remove barriers to the development of low-income rental housing.** Farmworkers seeking rental housing on the private market share major challenges with people with similar incomes. This includes an overall shortage of affordable units for individuals earning 40-60% MFI, and a significant shortage of rental homes, especially units large enough to accommodate families.
- **Evaluate eligibility requirements for subsidized housing and/or prioritization of subsidized housing funds.** As noted above, many domestic workers, both year-round and migratory, struggle to compete in local housing markets with low wages. Yet many farmworkers' incomes are not low enough to qualify for prioritization on subsidized housing waitlists.

Program Recommendations

- **Establish housing navigators for farmworkers.** Farmworkers are more likely to be immigrants and to speak a language other than English than the statewide population. This can put them at a disadvantage when they try to find housing. Housing navigators can help address these barriers by providing services customized to meet families' needs during the preparation and early housing search phases, including helping households know fair housing rights.

Other Recommendations

- **Evaluate reforms to the H-2A guest worker program.** From the farmworker perspective, working conditions for H-2A workers are often poor or unsafe. While housing is provided and is based on temporary housing standards, its quality varies significantly between employers. Growers value access to a stable workforce, which the H-2A program provides, but see significant room for improvement. The program is perceived among growers as cumbersome, time-consuming, expensive, and inflexible.

- **Advocate for immigration reform.** Undocumented immigrant farmworkers face many challenges. They are often unable or unwilling to advocate for better housing or conditions for fear of penalization for their immigration status. While state and local government assistance has been available to farmworkers during the pandemic, undocumented workers are ineligible for federal public benefits such as extra unemployment insurance or stimulus checks.

Project Introduction

Scope of the Project

This report was developed for the Department of Commerce to help the Legislature understand and address the challenges of providing decent and affordable housing for the farmworkers in Washington. The report summarizes funding available to develop farmworker housing, a brief overview of agricultural work in Washington, estimates of the current need and preliminary recommendations to meet the challenge.

Defining a Farmworker for this Project

For purposes of this study, we define a farmworker as someone whose employment is classified as Agriculture (11 NAICS⁴). There are a few exceptions, such as forestry and logging (113), fishing, hunting, and trapping (114), and support activities for forestry (1153). Employment in these industries totals approximately 6% of statewide covered agricultural employment, or 6,000 workers. Forestry and logging employment estimates are highest in Clallam, Cowlitz and Lewis counties. These counties are not profiled in detail in this report due to overall low agricultural employment compared to all counties statewide. Fishing, hunting and trapping employment is highest in King County, followed by Pacific County. This definition is aligned with the Washington State Employment Security Department (ESD), as they are a primary source for farmworker data in Washington.

Methods

This study approach includes industry analysis using publicly available data sources, a review of research on the topic, interviews with stakeholders, agricultural employers and advocates familiar with farmworker housing conditions in the state, and a survey of farmworkers. More details on these methods are presented below.

⁴ North American Industry Classification System

Data Sources

- **Beacon Development Group** records for permanent and seasonal farmworker housing stock
- **Catholic Community Services/Catholic Housing Services of Western Washington** for information on farmworker housing stock
- **Employment Security Department (ESD)** data was used to establish farmworker employment numbers and wages
- **Department of Health (DOH)** records for seasonal farmworker housing stock
- **Office of Rural and Farmworker Housing (ORFH)** records for permanent and seasonal farmworker housing stock
- **United States Department of Labor** data for H-2A visa requests
- **Washington State Department of Commerce (Commerce)** data for permanent and seasonal farmworker housing stock
- **Washington State Department of Agriculture (WSDA)** data for agricultural lands

Interviews

We are grateful to all interviewees for their time and insights. The following interviews were conducted to enhance our understanding of the farmworker housing landscape in Washington:

- Gloria Velasquez Burton, Catholic Community Services
- Erin Porter and Kimberly Gierach, Washington Department of Health (Dec. 5, 2019)
- Jason Davidson and Nona White, Department of Commerce (Jan. 6, 2020)
- Joshua Moll, Employment Security Department (Jan. 8, 2020)
- Marty Miller and Korbie Haley, Office of Rural and Farmworker Housing (Jan. 17, 2020)
- CaraMia Stearns-Vance, Employment Security Department (Jan. 17, 2020)
- Dan Fazio, Wafla (Feb. 27, 2020)
- Lowel Krueger, Yakima Housing Authority (March 2, 2020)
- Brett Valicoff, Valicoff Fruit Co. (March 6, 2020)
- Bryan Ketcham, Catholic Charities (March 19, 2020)

- Bre Elsey, Washington Farm Bureau (June 11, 2020)
- April Clayton, Red Apple Farms (June 22, 2020)
- Jon Devaney, Tree Fruit Association (June 23, 2020)
- Rosella Mosby, Mosby Farms (July 7, 2020)
- Josh Koempel, Rock Island Farm (July 9, 2020)

Washington COFS (COVID Farmworker Survey)

BERK is working with the Department of Health, University of Washington researchers and community partners on a survey of farmworkers across the state. The purpose of the survey is to gather information that can provide clear, consistent, transparent, linguistically appropriate and culturally intelligible statewide outreach and to farmworker communities about mitigating the current COVID-19 pandemic in Washington. Questions around housing needs and demographics will be especially relevant to this study.

The primary audiences for the survey include:

- Farm/agricultural workers
- Post-production workers (packing houses)
- Migrant farmworkers
- H-2A farmworkers
- Shellfish harvesters (aquaculture)
- Greenhouse and nursery workers
- Dairy workers

Surveys were conducted over the phone in August and September 2020 by promotoras and other trusted, locally-based farmworker community representatives. There was a quantitative survey and in-depth interview. Both methods were conducted in Spanish, with support for other languages as necessary. There were 217 respondents to the survey across the state. More information on the survey is available at this link: <http://covid19farmworkerstudy.org/washington-2/>

Farmworker Housing Landscape

Farmworker Housing Types

Farmworker housing falls into three broad categories:

1. Permanent housing
2. Temporary housing
3. Emergency housing

Permanent Housing

Permanent housing for farmworkers includes rental units that are available year-round and owner-occupied housing units. Most rental and owner-occupied housing units targeted for farmworkers are developed, owned and managed by nonprofit organizations or local housing authorities. Permanent housing units include units for individuals and families.

In addition to affordable units targeted for farmworkers, farmworkers may also live in rental or owner-occupied housing available on the private market, particularly in areas where targeted farmworker housing is limited. When renting or buying on the private market, farmworkers compete against other renters and homeowners for units and face market-rate housing prices that are generally unaffordable.

Temporary Housing

Temporary farmworker housing serves the needs of migrant workers and H-2A visa holders. It may take the form of single-family homes, apartments, dormitories, RVs or trailers, hotel or motel rooms, or other structures. In temporary housing, workers typically share rooms and other facilities. Beds in temporary housing facilities may be available on a nightly, seasonal or intermediate basis.⁵

Nonprofits, housing authorities, farm owners, and private market organizations operate temporary housing facilities for farmworkers. The Department of Commerce (Commerce)

⁵ Washington State Farmworker Housing Trust, "2006 Farmworkers Survey," (May 2007).

indirectly provides a limited amount of temporary housing via its Rent-a-Tent program, allowing cherry growers to rent tents to house workers at a subsidized rate. The program is restricted to farmers housing cherry harvest workers.⁶ Commerce also operates a trailer program at Monitor Park in Chelan County, which is managed by the county with operating funds from Commerce.

Traditionally, many farm operators provide temporary housing for migrant workers. However, state regulations designed to improve conditions in temporary farmworker housing have also increased costs for growers, leading some to stop providing housing.⁷ A notable exception is housing for H-2A visa workers – farm operators are required to provide housing for these workers.

Farmworker Housing Within the Context of the Growth Management Act (GMA)

Under the Growth Management Act, all counties in Washington must designate and conserve “natural resource lands of long term commercial significance.” Nonagricultural accessory uses and activities, including new buildings, parking or supportive uses, must not be located outside the general area already developed for buildings and residential uses and shall not otherwise convert more than one acre of agricultural land to nonagricultural uses.⁸ Washington’s 29 “fully planning counties” must also adopt a rural element in their comprehensive plan. The GMA requires various rural densities for rural lands that are not of commercial significance, typically one unit up to five, 10 or 20 acres, and the county comprehensive plan must define and protect rural character.⁹

The GMA allows accessory dwelling units (ADUs) on rural parcels. Typically, attached ADUs are permitted locally because they likely share driveways, wells and septic systems with the primary residence and appear as single-family developments. Detached ADUs usually have more regulatory requirements to guard against the impacts on rural character and service demand.

If licensed by the Department of Health (DOH), temporary/migrant farmworker housing is exempt

⁶ Washington State Department of Health, “Temporary Worker Housing (Migrant Farmworker),” (2020), <https://www.doh.wa.gov/LicensesPermitsandCertificates/FacilitiesNewReneworUpdate/TemporaryWorkerHousing/PermittedLandUse/Tents>; under [RCW 70.114A.110](#), H-2A visa workers may not be housed under the state’s cherry harvest temporary labor camp program since the H-2A regulations require that workers must be provided housing.

⁷ Interview with Dan Fazio, Executive Director, Wafila, (Feb. 27, 2020).

⁸ [RCW 36.70A.170](#) requires designation. [RCW 36.70A.177](#) allows innovative zoning techniques and accessory uses to support agricultural activities, but does not provide detail on additional residential uses. See also [WAC 365-196-815](#)

⁹ [RCW 36.70A.070\(5\)](#)

from the density requirements of the GMA.¹⁰ Temporary or migrant farmworker housing, which can be a permanent structure, must be located on a rural worksite and used for workers employed at the site. DOH licensing authority overrides local zoning regulations for licensed, temporary housing except for the building height, setback, and road access requirements for the local zone.¹¹

There are many examples across the state of permanent structures used for temporary housing. Most permitted examples are on farms, but many counties are starting to see a shift to building or repurposing facilities within towns to be closer to services. Some of these builds are dormitory-style and were built under local permitting, then retrofitted for farmworker housing.

The Flow of Public Dollars to Farmworker Housing

There are two main financial sources for farmworker housing: federal and state governments.

Federal Funding

The federal government funds the production of farmworker housing through block grant programs, competitive direct grant/loan programs and tax credits.

The programs funding permanent farmworker housing are:

- **The National Housing Trust Fund (HTF).** Administered by the Department of Housing and Urban Development (HUD), the national HTF provides states with block grants to fund the production and preservation of affordable housing units. Commerce awards national HTF funds to specific projects in Washington through a competitive application process (see the section on state HTF funds below).¹² This program only funds permanent housing, including for farmworkers.
- **Farm Labor Housing Direct Loans and Grants.** The Section 514/516 Farm Labor Housing (FLH) program provides loans and grants to develop on- and off-farm housing. The U.S. Department of Agriculture (USDA) Office of Rural Development (RD) administers this

¹⁰ [RCW 70.114A.050](https://www.doh.wa.gov/LicensesPermitsandCertificates/FacilitiesNewReneworUpdate/TemporaryWorkerHousing/FrequentlyAskedQuestions#13); Washington State Department of Health, "Temporary Worker Housing (Migrant Farmworker)," (2020), <https://www.doh.wa.gov/LicensesPermitsandCertificates/FacilitiesNewReneworUpdate/TemporaryWorkerHousing/FrequentlyAskedQuestions#13>

¹¹ [RCW 70.114A.050](https://www.doh.wa.gov/LicensesPermitsandCertificates/FacilitiesNewReneworUpdate/TemporaryWorkerHousing/FrequentlyAskedQuestions#13)

¹² National Low Income Housing Coalition, "Getting Started: First Homes Being Built with 2016 National Housing Trust Fund Awards" (2018), https://nlihc.org/sites/default/files/NHTE_Getting-Started_2018.pdf

competitive loan and grant program. Farmers, farm associations, nonprofit organizations, state and local governments, and Tribal nations are eligible to receive these grants or low-interest loans to fund the construction of affordable, permanent housing for farmworkers.¹³

- **Community Development Block Grants (CDBG).** Jurisdictions may use CDBG funds for a range of programs benefitting low- and middle-income residents. While funds are not specifically for farmworker housing, projects that support the production and operation of housing for low-income farmworkers are eligible. Cities and counties that meet HUD's minimum population threshold receive CDBG entitlements directly, while the state distributes the remaining funds to lower-population jurisdictions on a competitive basis.¹⁴ This program only funds permanent housing, including for farmworkers.
- **Multi-family Housing Direct Loans.** Under this competitive program administered by the USDA, developers may receive low-interest loans to fund affordable rental housing construction in rural areas.¹⁵ This program only funds permanent housing, including for farmworkers.
- **The Low Income Housing Tax Credit (LIHTC).** The LIHTC is a federal program administered by HUD. HUD issues tax credits to states, which then can award them to developers to incentive the production of affordable housing for low-income tenants. This program funds only permanent housing, including for farmworkers.

State Funding

Farmworker housing projects are eligible for the following two state funding:

- **The state Housing Trust Fund (HTF)** – funds both permanent and temporary/seasonal farmworker housing.
- **The retail sales and use tax exemption** on labor, services, and materials used to construct or improve farmworker housing – can apply to the construction of permanent and temporary/seasonal farmworker housing.

Each year, Commerce distributes **state HTF**, **federal HTF** and **federal HOME** dollars to qualified

¹³ U.S. Department of Agriculture, "Farm Labor Housing Direct Loans & Grants," (2019), <https://www.rd.usda.gov/programs-services/farm-labor-housing-direct-loans-grants>

¹⁴ Washington State Department of Commerce, "Community Development Block Grants – General Purpose Grants," (2020), <https://www.commerce.wa.gov/serving-communities/community-development-block-grants/cdbg-general-purpose-grants/>

¹⁵ U.S. Department of Agriculture, "Multi-Family Housing Direct Loans," (2020), <https://www.rd.usda.gov/programs-services/multi-family-housing-direct-loans>

capital projects in Washington through a competitive funding process. Farmworkers are a priority population for HTF-funded projects, so the Washington State Legislature sets annual funding targets for farmworker housing projects. However, because the program is administered on a competitive funding basis, the state's ability to meet that target is affected by the quantity and quality of project applications for farmworker housing projects each year. The WSHFC distributes **federal LIHTC** dollars via a competitive process.¹⁶

In 2019, Commerce distributed \$12 million in state and federal HTF funds to four farmworker housing projects, supporting the construction of a combined 226 units of permanent housing.¹⁷

The LIHTC and sales and use tax exemption programs take the form of foregone revenue. They are intended to incentivize private developers to build farmworker housing and, in the case of LIHTC, offer income-restricted units.

Funding Trends

State funding for farmworker housing has increased over the last 30 years, though the production of new units and beds with those funds has slowed since 2014. When the state established the HTF in 1987, farmworker housing projects were eligible for loans and grants, but no funds were set aside specifically for this housing type. As a result, by 1998, the state had committed only \$6.8 million to farmworker housing projects.

In 1999, former Gov. Gary Locke established the Washington State Farmworker Housing Program, a specific program within the HTF. For the first time, the Washington State Legislature set a goal for public funding of farmworker housing projects — \$4 million per year. In its first six years of operation, the program distributed \$48.4 million in competitive grant/loan funds. It funded the construction of facilities with 1,015 permanent housing units and 4,054 seasonal beds for farmworkers.¹⁸

In 2009, the Farmworker Housing Program was again folded under the state HTF, though the funding targets for farmworker housing remained in place. In its most recent six years of operation (2014-2019), the HTF awarded \$48.0 million for farmworker housing.

Though the level of funding for farmworker housing has remained consistent since 1999, the total

¹⁶ Washington State Housing Finance Commission, "Multifamily Housing," (2018), <https://www.wshfc.org/mhcf/index.htm>

¹⁷ Washington State Department of Commerce, "2019 Capital Awards for Affordable Housing," (2019), <https://deptofcommerce.app.box.com/s/9xm5sx1rrr1qw0njxo1o1srlm7vw3coa>

¹⁸ Washington State Department of Community, Trade and Economic Development, "Farmworker Housing in Washington State: Safe, Decent and Affordable," (March 2005).

number of units and beds produced with those funds is lower in the last six years than in the program's first six years. From 1999-2004, the program supported the production of 5,069 permanent units and seasonal beds. From 2014-2019, the HTF supported the production of 1,709 units and beds. This is likely due to two reasons:

1. A focus on permanent housing — 36% of the production in 2014-2019 was permanent units, compared with 20% in 1999-2004
2. Rising construction costs in Washington

Funding Gaps

A major gap, particularly at the federal level, is funding for facilities that accept undocumented farmworkers. Nationally, nearly half of farmworkers (48%) are undocumented,¹⁹ yet federal regulations prohibit facilities funded by the Farm Labor Housing and Multi-family Housing loan and grant programs from renting to undocumented individuals.²⁰ In addition, programs that support homeownership, like the federal HOME program, are less likely to support undocumented individuals, as many lending institutions will not grant mortgages to undocumented individuals.²¹

Farmworker Housing Funders

In addition to federal and state programs, several nonprofit, social enterprise, and quasi-public organizations subsidize or support farmworker housing in Washington.²² These include:

- **Impact Capital.** A community development financial institution that provides low-interest and flexible lending to nonprofit and public entities producing affordable housing.
- **Federal Home Loan Banks.** A national consortium of 11 regional banks that provide low-cost funding to financial institutions that support the production of affordable community housing.
- **Rural Community Assistance Corporation.** A nonprofit organization providing low-cost

¹⁹ Farmworker Justice, "Farmworker Housing and Health in the United States: A General Introduction and Overview," (2014).

²⁰ Washington State Department of Community, Trade and Economic Development, "Farmworker Housing in Washington State: Safe, Decent and Affordable," (March 2005).

²¹ Deyanira Del Río. "Mortgage Lending and Foreclosures in Immigrant Communities: Expanding Fair Housing and Fair Lending Opportunity Among Low Income and Undocumented Immigrants," (Kirwan Institute for the Study of Race and Ethnicity, The Ohio State University, 2010), 3-8, http://www.kirwaninstitute.osu.edu/reports/2010/02_2010_ForeclosuresandImmigrantComm_DelRio.pdf

²² Washington State Department of Community, Trade and Economic Development, "Farmworker Housing in Washington State: Safe, Decent and Affordable," (March 2005).

financing for affordable housing projects and training and advising for rural communities.

- **Washington Community Reinvestment Association.** A consortium of financial institutions that provides low-interest loans to farmers and developers to establish on-farm housing.
- **Washington State Housing Finance Commission.** A self-funded state agency that provides tax-exempt financing and tax credits to developers and nonprofits to fund affordable housing projects.

Farmworker Housing Developers

Most farmworker housing projects in Washington are developed by organizations that fall into one of four categories:

- **Catholic charity and housing services organizations.** Catholic housing services organizations have developed more than 60% of the state-funded permanent housing units for farmworkers since 2013. These organizations are regionally based and include Catholic Charities Housing Services - Diocese of Yakima, Catholic Housing Services of Eastern Washington - Diocese of Spokane, and Catholic Community Services/Catholic Housing Services of Western Washington - Diocese of Western Washington, among others. These organizations do not typically develop seasonal housing.²³
- **Local housing authorities.** Housing authorities are independent public corporations and may be associated with a city, county or region. In Washington, housing authorities develop both permanent and seasonal farmworker housing. Major developers include the Yakima Housing Authority,²⁴ which owns 172 farmworker housing units, and the Housing Authority of Skagit County, which has developed 50 permanent units of farmworker housing and 112 seasonal beds since 2013.²⁵
- **Farmworker and farmer associations.** Wafla (farmworkers) and the Washington Growers League (farm operators) develop farmworker housing, primarily seasonal facilities. Since 2013, they have developed state-funded housing facilities with more than 1,000 seasonal beds.²⁶

²³ Washington State Department of Commerce, "Capital Awards for Affordable Housing," (2013-2019).

²⁴ Yakima Housing Authority, "Farmworker Housing," (2021), <https://www.yakimahousing.org/services/farmworker-housing/>

²⁵ Washington State Department of Commerce, "Capital Awards for Affordable Housing," (2013-2019).

²⁶ Ibid.

- **Nonprofit housing services organizations.** Compared to other developer categories, these organizations play a relatively minor role.²⁷ However, they may develop permanently affordable housing units available to, but not necessarily restricted to, farmworkers.

²⁷ Ibid.

Farmworkers and COVID-19

The COVID-19 Farmworker Study (COFS) used a phone-based quantitative survey and in-depth interviews to bring farmworkers' voices into the public conversation about how to respond to the pandemic. In addition, the study brought together community-based organizations, researchers and advocates to learn about farmworkers who have been working during the COVID-19 pandemic.

According to the study:

- Thirty-six percent of workers stated that they carpooled to work. Most traveled in a regular vehicle and 14% traveled in a van or truck. Fifty-six percent of workers who carpooled traveled with the same people all the time. Among workers who carpooled with various people, 22% stated that they have traveled or worked with someone who presented symptoms of COVID-19.
- Sixty-six percent of workers reported changes in hygiene in the workplace. Seventy-three percent reported that their employers provided them with a mask. In addition, 5% reported an inadequate number of bathrooms in proportion to the number of workers, according to [WAC 296-800-23020](https://www.wacourts.gov/296-800-23020).
- Forty-nine percent of workers received at least one form of COVID-19 training, 18% received two forms of training, and 13% received three. Training on how to use personal protective equipment could be in the form of a presentation, pamphlet or video.
- Almost all workers took precautions to protect their families when they got home from work.
- Thirty-nine percent of workers indicated that lack of insurance or costs were barriers to receiving medical care. Other barriers to receiving care were loss of wages (23%), loss of work (20%), lack of sick leave (13%), fear of government authorities (6%), and lack of childcare (3%).
- Workers indicated that daily financial challenges include food (50%), rent (46%), utilities (47%), water (43%) and childcare (17%).

Background

Washington was the first state to experience a major outbreak of COVID-19 in early 2020. Since

then, several Washington counties, including Okanogan²⁸ and Yakima,²⁹ have experienced documented outbreaks of the coronavirus among farmworkers.

Agricultural workers, particularly seasonal workers, may be at higher risk of contracting the disease than the general population. Farmworkers were declared essential workers during the pandemic, permitting them to work even in areas with stay-at-home orders.³⁰ In addition to risks that come with simply going to work during a pandemic, the conditions of agricultural work put farmworkers at particular risk.

Depending on the nature of the work, physical distancing while on the job may be impossible. For example, machines used for harvesting lettuce have fixed seats that are less than six feet apart. In addition, many workers are in enclosed work environments with insufficient ventilation (such as meat packing/processing plants). Limited facilities in fields and orchards also impede handwashing – workers at some farms in California have described overcrowded handwashing stations and soap that runs out.³¹

Outside of work, seasonal and migrant farmworkers face unique challenges in maintaining appropriate distance from others. According to the COFS survey, farmworkers often travel to worksites together, sitting in close proximity in vehicles and touching the same surfaces, both of which may increase disease spread. Migrant workers typically live in congregate housing, in which multiple workers shared a bedroom and common spaces. For H-2A visa workers in Washington, housing often consists of dormitory-style rooms with four workers per bedroom. Reporting from California suggests that some farmworker housing is even more crowded – a legal aid organization filed suit over a residence in central California where 18 to 20 workers shared two bedrooms.³²

When farmworkers become sick, the environment often does not allow for effective isolation or adequate access to medical care. Because of the time-sensitive nature of harvests, workers feel pressured to work through illnesses. Congregate housing makes it difficult to isolate from other workers when ill.³³ In addition, most agricultural work occurs in rural areas, where the number of

²⁸ Hal Bernton, "Farmworker death draws state scrutiny in Okanogan County, where COVID-19 cases are spiking," *Seattle Times*, (July 25, 2020), <https://www.seattletimes.com/seattle-news/health/farmworker-death-draws-state-scrutiny-in-okanogan-county-where-covid-19-cases-are-spiking/>

²⁹ Jesse Newman, "Coronavirus Hits Nation's Key Apple, Cherry Farms," *Wall Street Journal*, (July 6, 2020), <https://www.wsj.com/articles/coronavirus-hits-nations-key-apple-cherry-farms-11594027802>

³⁰ Miriam Jordan, "Farmworkers, Mostly Undocumented, Become 'Essential' During Pandemic," *New York Times*, (April 2, 2020), <https://www.nytimes.com/2020/04/02/us/coronavirus-undocumented-immigrant-farmworkers-agriculture.html>

³¹ David Bacon, "America's Farmworkers—Now 'Essential,' but Denied the Just-Enacted Benefits," *American Prospect*, (April 1, 2020), <https://prospect.org/coronavirus/american-farmworkers-essential-but-unprotected/>

³² Ibid.

³³ Ibid.

health care providers is limited. This lack of access is compounded for undocumented agricultural workers, who are ineligible for many forms of health insurance coverage and may be limited to receiving care in emergency rooms or community clinics.³⁴

Economic conditions and lost income from the pandemic have exacerbated inequities. Other reasons farmworkers report for lost work time include lack of demand in food supply chains, hiring fewer employees to prevent virus spread, childcare issues, and fear of exposure. Food insecurity is also a key health issue in the pandemic. While food banks and other community resources offer relief for food insecurity, some farmworkers face barriers to utilizing these supports. For example, the National Guard helped distribute food at food banks in some communities, which may deter farmworkers because of the military presence.

³⁴ California Institute for Rural Studies, "COVID-19 Farmworkers Study (COFS)," (2021), <https://cirsinc.org/covid-19-farmworker-study/>

Agricultural Work in Washington

History of Farmworkers in Washington

The history of agriculture in Washington is deeply entwined with the state's histories of colonization, land ownership, immigration, racism and social and economic justice. This section provides a brief overview of farm labor and agriculture history in Washington, emphasizing its connection to colonization, race and social justice.

First Peoples

Since time immemorial, the first peoples of the Pacific Northwest fished the area's rivers, streams, lakes and seas; hunted game in its forests and plains; and gathered wild plants. Fish, particularly salmon, were also central to the diet, culture and way of life for Native Americans in this area. Indigenous peoples were involved in active land management before the arrival of Europeans; they burned prairie lands to maintain healthy prairie ecosystems and allow the camas root to dominate, and planted crops in some areas.³⁵

From the earliest exploration by Europeans of the area now known as Washington, owners and operators of farms have been almost exclusively European or white, while farm laborers have included Native Americans, immigrants from Asia, Europe, and Latin America, and whites.

Exhibit 1: Clam digging near Port Townsend, 1910



Source: Sam G. Morse, 1910; Washington State Library Photograph Collection, 2020

³⁵ Denise Ranney, *Washington State History (Transitional Learning)* (Bellingham, WA: Whatcom Community College Press).

European Exploration

The earliest European arrivals were Spanish, British, and Portuguese explorers who landed on the Pacific coast in the late 18th century

Exhibit 2: Peeling bitterroot, 1955



resurgence 50 years later.³⁶

Source: Unknown photographer, 1955; Washington State Library Photograph Collection, 2020

hunting otters for the fur trade.

These Europeans established settlements, forts, and trading posts in both Western and Eastern Washington. In 1792,

Spaniard Salvador Fidalgo arrived at Neah Bay with 83 men and orders to build a military settlement, including the directive to enlist local Native Americans as laborers for the installment's farm. The settlement failed within months, but white settlement of the region experienced a

Farmers and Farmworkers
Farmers, or operators, are individuals who own or manage a farm. Operators hire farm workers as laborers for wages. These arrangements are often seasonal, or limited to a specific task, such as the harvest of a crop.

White Settlement

Among the first white American settlers in the area was New York minister Marcus Whitman and his wife, Narcissa. They established a mission at Waiilatpu, near present-day Walla Walla, in 1836. The Whitmans attempted to hire the local Cayuse people as laborers to establish the mission's farms and construct its buildings but could not afford the wages (in the form of tobacco, gunpowder, and clothing) the Cayuse requested. Instead, the Whitmans hired Kanakas — native Hawaiian laborers³⁷ — and whites.³⁸ Marcus Whitman invested a significant amount of time in encouraging the Cayuse to adopt agricultural practices — he believed that doing so would lead them to abandon seasonal migration and subsequently provide him with more time to convert them to Christianity.³⁹

Land Ownership

Beginning in the mid-19th century, the federal government and Washington's government — territorial, then state — passed laws granting millions of acres of free land to white settlers and dispossessed Native Americans of the lands they inhabited. These included:

- The 1850 Oregon Donation Land Act, which granted 320 acres of free land to white male U.S. citizens in the Oregon Territory.⁴⁰
- The 1862 Homestead Act, which granted 160 acres of land to any U.S. citizen 21 or older.
- A series of treaties with Tribal nations, through which the federal government took hundreds of thousands of acres of land and Native Americans were moved onto reservations.⁴¹

The result was that landowners — and subsequently farmers and farm operators — were almost exclusively white.

19th Century Farming Operations

From the 1850s to the 1880s, the state's major agricultural operations were concentrated in western Washington and included timber, hops, fruits and vegetables. While most farm workers were single white men, operators hired Native American men, women, children, and immigrant Chinese men to assist with harvests. In 1886, the completion of the Northern Pacific Railroad across the Cascades made large-scale crop farming feasible in Eastern Washington, predominately winter wheat. These Eastern Washington wheat farms employed the first known migratory farm workers in Washington — men who traveled between farms in Washington, Oregon and Idaho for the wheat harvest.⁴²

Exhibit 3: Farmer in wheat field, Adams County



Source: A.M. Kendrick, n.d.; Washington State Library Photograph Collection, 2020

⁴⁰ Kenneth R. Coleman, "White Man's Territory," (Oregon Humanities, 2018), <https://www.oregonhumanities.org/rll/magazine/owe-spring-2018/white-mans-territory-kenneth-r-coleman/>

⁴¹ When the first Washington Territorial Legislature met in 1854, it carved out a single exception to the white monopoly on land ownership — the family of George Washington Bush, a free African American who settled in the Olympia area in 1846; Denise Ranney, *Washington State History (Transitional Learning)*, (Bellingham, WA: Whatcom Community College Press); Tim Wright, "A History of Treaties and Reservations on the Olympic Peninsula, 1855-1898" (Olympic Peninsula Community Museum, 2017).

⁴² James N. Gregory, "Towards a History of Farmworkers in Washington State," (In *Farmworkers in Washington State*, Seattle Civil Rights & Labor History Project, 2009), http://depts.washington.edu/civilr/farmwk_ch1.htm#_edn3

20th Century Immigration

Exhibit 4: Cannery Workers and Farm Laborer’s Union founding members,



In 1902, the U.S. Bureau of Reclamation began extensive irrigation projects in the Okanogan, Wenatchee and Yakima valleys, enabling these regions to produce the fruit and vegetable crops they are famous for today. The rise of these crops in central Washington led to an increased need for seasonal labor. By 1935, farmers in the Yakima Valley were hiring 33,000 workers for the harvest. In the early years of these harvests, whites and members of the Yakama Nation made up most of the workforce.⁴³

Though white men made up the majority of Washington’s farm workforce until the late 20th century, immigrants and people of color began to join agricultural work in large numbers as early as the 1880s. These included Chinese, Japanese and Indian immigrants. In the early 20th century, many Japanese families settled Bellevue, the Kent Valley, and portions of Pierce County, establishing productive farms and selling produce in Seattle. However, the success of Japanese farmers resulted in a racist backlash – white farmers led a two-year campaign to force Japanese families out of farming. In 1921, the Washington State Legislature passed the Alien Land Law, making it illegal for Japanese individuals to own or buy land in Washington. The farm acreage operated by Japanese families fell by more than 50% in just two years.⁴⁴

Source: Seattle Civil Rights & Labor History Project, 2020

making it illegal for Japanese individuals to own or buy land in Washington. The farm acreage operated by Japanese families fell by more than 50% in just two

After Congress passed the Immigration Act of 1924, barring all immigration from the Eastern Hemisphere to the U.S., the immigration patterns for farm work shifted. Soon, the largest groups of immigrant farm workers were Mexicans and Filipinos, who were exempt from the Immigration Act because the Philippines was a U.S. territory at the time. Because of their legal status, Filipino laborers were more aggressive in forming unions than previous immigrant groups had been. The Cannery Workers and Farm

Farmers and Farmworkers
Farmers, or operators, are individuals who own or manage a farm. Operators hire farm workers as laborers for wages. These arrangements are often seasonal, or limited to a specific task, such as the harvest of a crop.

⁴³ Maria Quintana and Oscar Rosales Castañeda, “Asians and Latinos Enter the Fields,” (In *Farmworkers in Washington State*, Seattle Civil Rights & Labor History Project, 2009), http://depts.washington.edu/civilr/farmwk_ch4.htm#_edn8

⁴⁴ Maria Quintana and Oscar Rosales Castañeda, “Asians and Latinos Enter the Fields”

Laborer’s Union (CWFLU), formed by Filipino immigrants in 1933 in Seattle, became one of the first American Federation of Labor (AFL) unions led by people of color. Despite violent responses by farm operators and white workers, Filipino laborers continued to organize, participate in strikes, and form new unions through the 1940s and 1950s.⁴⁵

Facing labor shortages in World War II, the federal government authorized the Bracero Program, which granted Mexican laborers legal authorization to work in the U.S. on a temporary contract basis. More than 40,000 braceros were contracted to work for farms in the Pacific Northwest. Working conditions were poor and illnesses and injuries on the job were common, so braceros organized, authorizing a series of work stoppages throughout the 1940s. Farm operator frustration with the organization and work stoppages eventually led to the program’s demise in the Pacific Northwest.⁴⁶

Farmworkers in the 21st Century

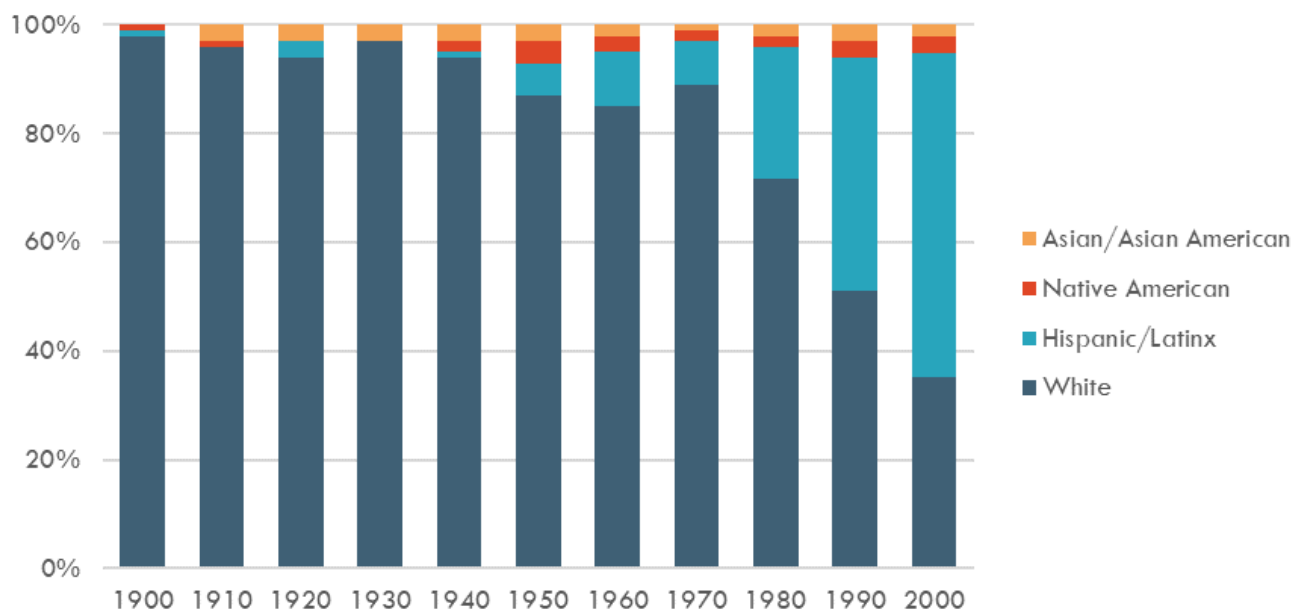
After the termination of the bracero program, many Mexican American, Mexican and other Hispanic/Latino immigrants settled in the Pacific Northwest, particularly in Eastern Washington farming communities, such as Yakima, Toppenish, Pasco and Othello.⁴⁷ Throughout the second half of the 20th century, the number of Hispanic/Latino farm workers in Washington increased steadily. In the 1990s, Hispanic/Latino workers became the majority ethnic group among Washington’s farmworkers for the first time.

⁴⁵ Ibid.

⁴⁶ Maria Quintana and Oscar Rosales Castañeda, “Asians and Latinos Enter the Fields”

⁴⁷ Oscar Rosales Castañeda, “Mexican-American Struggles to Organize,” (In *Farmworkers in Washington State*, Seattle Civil Rights & Labor History Project, 2009), http://depts.washington.edu/civilr/farmwk_ch5.htm

Exhibit 5: Race of Washington Farmworkers, 1900-2000



Source: U.S. Census Bureau, 2000; Gregory, 2009; BERK, 2020.

Since World War II, Hispanic/Latino workers centered in the Yakima Valley area led labor organizing among farm workers in Washington. In 1986, Cesar Chavez led a march of more than 2,000 farm workers from Granger to Yakima to protest low wages and poor working conditions. Later that year, workers formed the Washington chapter of the United Farm Workers (UFW).⁴⁸ Organizing by Hispanic/Latino farmworkers has continued into the 21st century. In 2006, organizers held a “Day without Immigrants” demonstration in Yakima that attracted more than 15,000 marchers.⁴⁹ In May 2020, more than 100 fruit packers went on strike in Selah, protesting the dangerous conditions resulting from COVID-19.⁵⁰

Statewide Trends in Farmworker Location and Industry

The Washington State Employment Security Department divides Washington into six agricultural

⁴⁸ Oscar Rosales Castañeda, “The Creation of the Washington State UFW in the 1980,” (In *Farmworkers in Washington State*, Seattle Civil Rights & Labor History Project, 2009), http://depts.washington.edu/civlir/farmwk_ch9.htm

⁴⁹ Oscar Rosales Castañeda, “The Struggle Continues,” (In *Farmworkers in Washington State*, Seattle Civil Rights & Labor History Project, 2009), http://depts.washington.edu/civlir/farmwk_ch10.htm

⁵⁰ Enrique Perez de la Rosa, “Are Their Apples Worth More Than Our Lives?: Yakima Valley Fruit Workers Strike,” *Oregon Public Broadcasting*, (May 22, 2020), <https://www.opb.org/news/article/farmworker-strike-yakima-valley-fruit/>

reporting areas, as shown in Exhibit 6. In 2018, more than half of the total average annual covered employment in agriculture stemmed from two reporting areas spanning most of Central Washington, described below. These two regions also had the highest variable (seasonal) employment in 2018.⁵¹ Population data for the counties below are from the American Community Survey.

South Central Area 2 is north east of the Columbia River in south-central Washington. It includes Klickitat and Yakima counties.

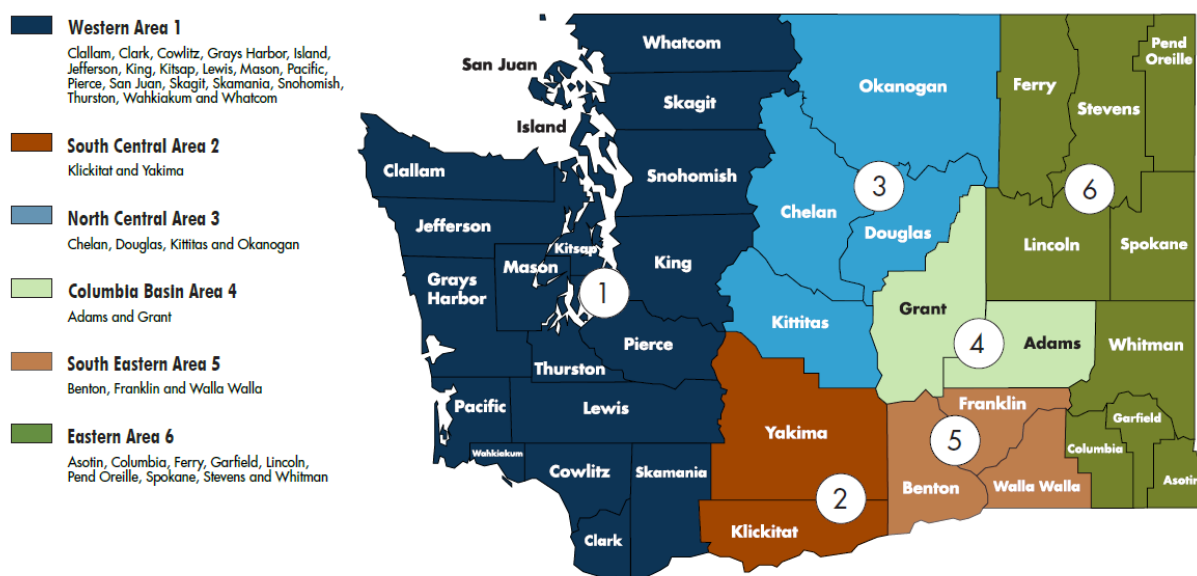
- Klickitat County had an estimated population of 22,107 in 2018. The county primarily produces fruits, tree nuts and berries, as well as some cattle.
- Yakima County had an estimated population of 251,446 in 2018. The county produces the most apples, sweet cherries and pears of any county in Washington and the most hops of any U.S. county.

North Central Area 3 is in north-central Washington, directly north of South-Central Area 2, and borders Canada. This region includes Chelan, Douglas, Kittitas and Okanogan counties.

- Chelan County had an estimated population of 77,036 in 2018. Chelan County produces fruits, tree nuts and berries almost exclusively.
- Douglas County had an estimated population of 42,907 in 2018. The county primarily produces apples, wheat and cattle. Agriculture employs one-third of the county workforce, the most workers of any industry sector.
- Kittitas County had an estimated population of 47,364 in 2018. The region grows excellent grass, and its major agricultural industries are hay and cattle.
- Okanogan County had an estimated population of 42,132 in 2018. In 2017, agriculture – mostly tree fruits and wheat – provided more jobs countywide than any other industry sector.

⁵¹ Gustavo Avilés, Josh Moll, Toby Paterson, and Zoe Zadworny, "2017 Agricultural Workforce Report," (Washington State Employment Security Department, September 2019).

Exhibit 6. Agricultural reporting areas in Washington



Source: Washington State Employment Security Department, 2019

In 2017, apple orchards were the largest agricultural industry by employment, employing 25,074 covered farmworkers).⁵² However, farm workers do not typically work only within a single agricultural industry or crop. Throughout 2016, more than 40% of agricultural employees worked in a different agricultural industry than in the prior quarter, compared to less than 22% of employees in all other sectors.⁵³

Statewide Demographic Information on Farmworkers

According to the COVID Farmworker Survey (COFS) study:

- Among Washington farmworkers, 23% of families speak English and Spanish at home, and 70% of families who speak an indigenous language also speak Spanish.

Farmworkers’ needs and preferences, as well as housing situations, vary. The COFS study found that farmworkers live in various housing types, including homes, apartments and

⁵² Gustavo Avilés, Josh Moll, Toby Paterson, and Zoe Zadworny, “2017 Agricultural Workforce Report,” (Washington State Employment Security Department, September 2019).

⁵³ Gustavo Avilés, Daegoon Lee, Ph.D; Alex Roubinchtein, Ph.D., Zoe Zadworny, “2016 Agricultural Workforce Report,” (Washington State Employment Security Department, 2018).

trailers.

- Housing is generally considered affordable if households spend no more than 30% of their incomes on housing.⁵⁴
- The COFS study found that close to 20% of farmworkers surveyed spend more than half their monthly income on housing.
- About 37% of survey respondents spend between 25-50% of their incomes on housing.

Language and Ethnicity

According to 2008 data:⁵⁵

- Farmworkers primarily speak Spanish, and many have limited English proficiency. In 2006, 94% of farmworkers surveyed by the Washington State Farmworker Housing Trust indicated that they speak Spanish as a primary language at home. Only 1% of farmworkers surveyed indicated speaking English at home, and more than three-quarters indicated they could neither read nor write in English.
- Farmworkers' native language varies by location. For example, in Skagit County, many farmworkers speak a first language other than Spanish, with the two primary languages being Mixteco and Triqui, two indigenous languages from Mexico. Many farmworkers also speak regional variations of both languages.
- In 2006, nearly all farmworkers described themselves as ethnically Mexican or Central American. Ninety-five percent of farmworkers surveyed described themselves as "Mexican" or "Mexican American," and the remaining 5% identified as "Indigenous Mexican" or "Central American."⁵⁶

Employment Patterns

Seasonality is a key feature of agricultural employment. Farmworkers are often qualified as migrant or year-round workers, depending on their residence. Migrant farmworkers travel for work

⁵⁴ U.S. Department of Housing and Urban Development, "Glossary of Terms to Affordable Housing," <https://archives.hud.gov/local/nv/goodstories/2006-04-06glos.cfm>

⁵⁵ Washington State Farmworker Housing Trust, "A Sustainable Bounty: Investing in our Agricultural Future," (Washington State Farmworker Housing Trust), 2008.

⁵⁶ IBID.

for at least part of the year. On the other hand, a year-round farmworker lives in the same community and may work for different growers. For example, year-round workers typically work for a period with one grower on cherries and may later work on apples and pears for a different grower in a different season.

Workers who arrive with H-2A foreign worker visas comprise a third category of employees for the statewide agricultural sector. Given labor shortages due to a shrinking and aging workforce, immigration policy changes, the voluntary return of many Mexican people, and lower numbers of domestic migrant workers from California and Texas, growers have increasingly turned to this seasonal guest-worker program to augment and access a stable supply of labor.

Employment type definitions:

- ***Year-round covered employment:*** Year-round (or “stable,” as used by ESD) agricultural jobs (not workers)
- ***Migrant covered employment:*** Seasonal, or “variable,” agricultural jobs (not workers) still covered by unemployment insurance
- ***Migrant H-2A employment:*** Based on number of H-2A visas requested by employers, adjusted down to 75% reflecting requests versus actual workers who arrive. Annual total, reported by the ESD, adjusted to monthly seasonal rates by federal Department of Labor reporting.

Sources: Washington ESD, 2019; U.S. Department of Labor, 2020; BERK, 2020

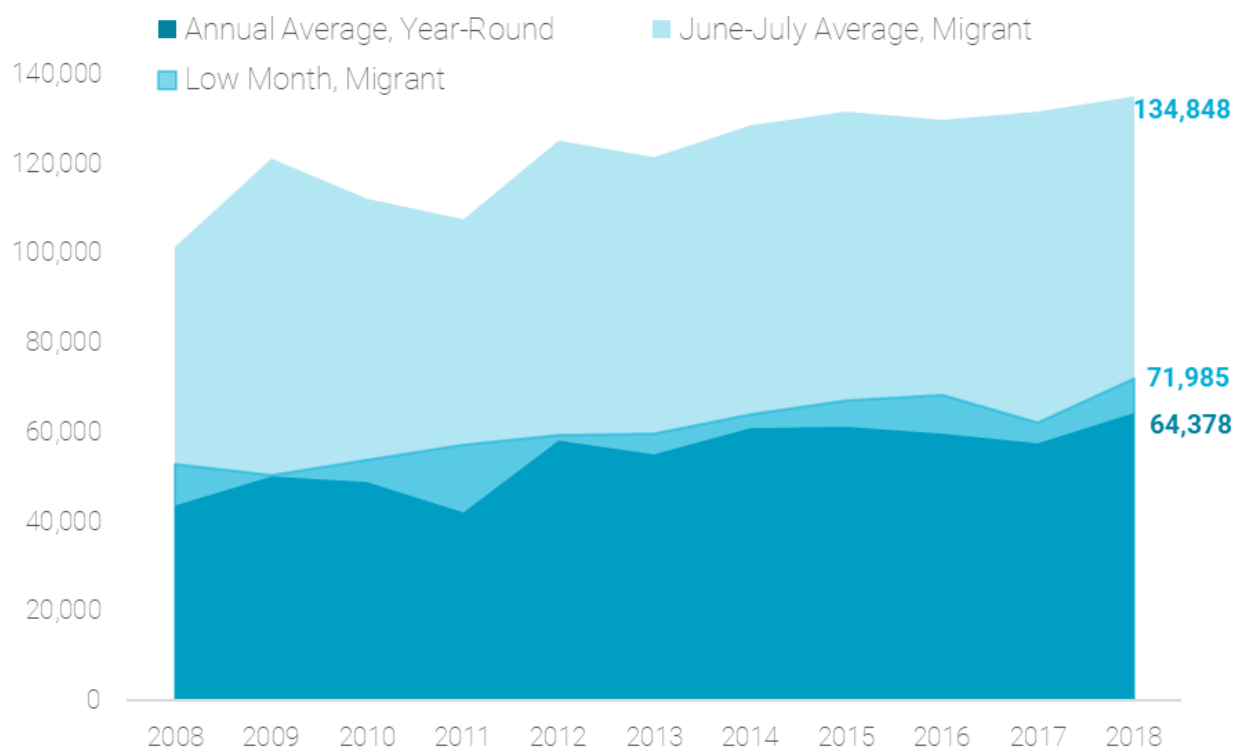
The seasonality of the workforce and the number of jobs that a single worker can hold makes the quantification of agricultural jobs very challenging. The best available source for employment information is the Employment Security Department’s Agricultural Workforce Report. ESD categorizes agricultural sector jobs as variable (migrant workers) and stable (workers who may live in one area and work almost year-round). H-2A workers are not included in this dataset. ESD maintains annual counts of H-2A visa requests in Washington but does not report further detail on these reports.

The federal Department of Labor publishes a database of H-2A worker requests by farm location and months of the request. This information can be used to understand what percentage of

ESD’s total H-2A visa request count is distributed across Washington’s counties throughout the year. This count is then discounted to reflect the reality that request counts are higher than actual H-2A workers are.

In 2018, the total covered farmworker employment was 134,848, as shown in Exhibit 7. Of this count, year-round employment included 64,378 jobs, while the migrant employment counts range from 7,607 in January to 73,616 in July.⁵⁷

Exhibit 7: Statewide Average Annual Covered Employment, Year-Round and Migrant, 2008-2018



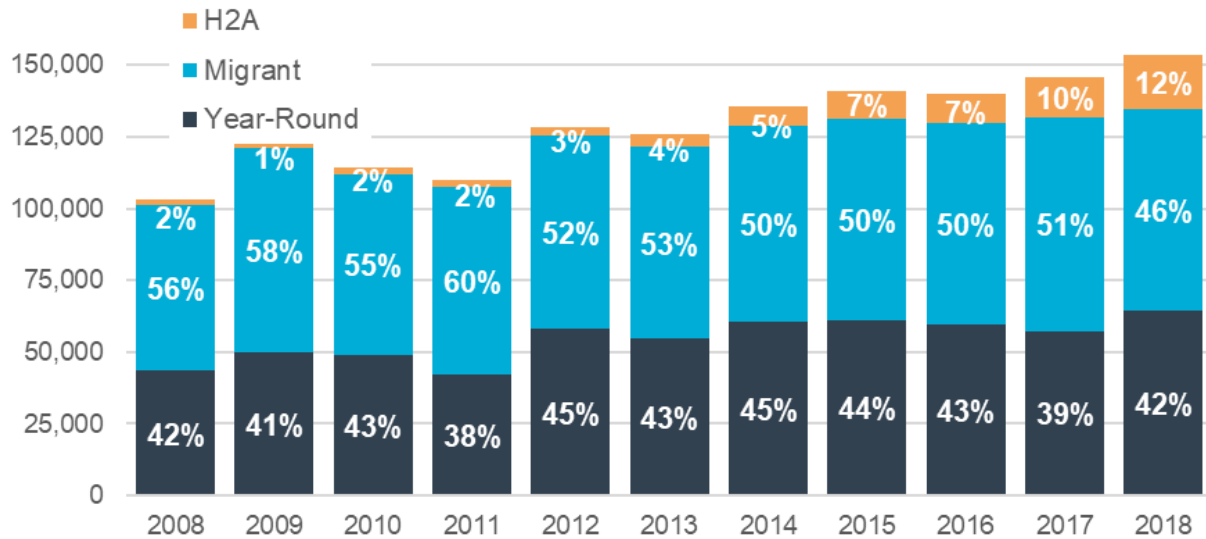
Sources: Employment Security Department/LMEA, 2019; U.S. Bureau of Labor Statistics, QCEW, 2019; BERK, 2020

Agricultural employment has grown from 2008 to 2018. The makeup of this workforce, however, has changed by employment type. Year-round employment has remained relatively stable as a proportion of the workforce, while domestic migrant employment has decreased in its share of total farmworker employment from 56% to 46%. Foreign workers through the H-2A visa program have increased to fill this gap. As shown in Exhibit 8, H-2A workers have increased from 2% to

⁵⁷ U.S. Department of Labor, “Performance Data,” <https://www.dol.gov/agencies/eta/foreign-labor/performance>

12% over the same period – an increase of almost 17,000 workers.

Exhibit 8: Statewide Annual Agricultural Employment by Type, 2008-2018

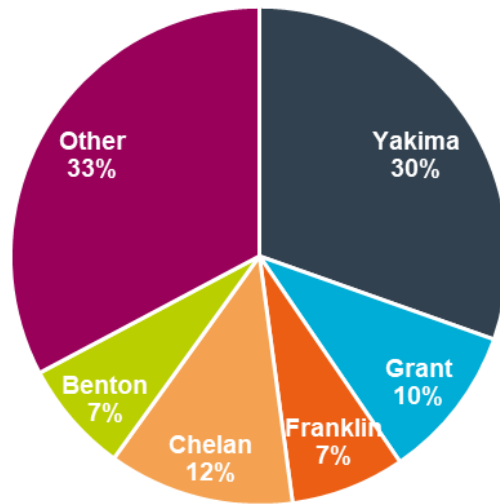


Sources: Employment Security Department/LMEA, 2019; U.S. Bureau of Labor Statistics, QCEW, 2019; BERK, 2020

Note: H-2A workers requested reduced by 75% to reflect trends of actual workers arrived; migrant and year-round employment numbers based on June-July average employment estimates.

Yakima County represents nearly one-third of statewide agricultural employment, with a much higher proportion of domestic employment than H-2A workers. See Exhibit 9 and Exhibit 10. H-2A worker distribution varies in geography. Counties in central Washington, such as Grant, Okanogan and Benton, rely much more heavily on H-2A workers. Qualitative input from grower interviews suggests that this may be related to the rural nature of these counties. These rural areas require long transportation times to access remote farmland, which makes it difficult to attract domestic labor, so H-2A workers help fill this gap.

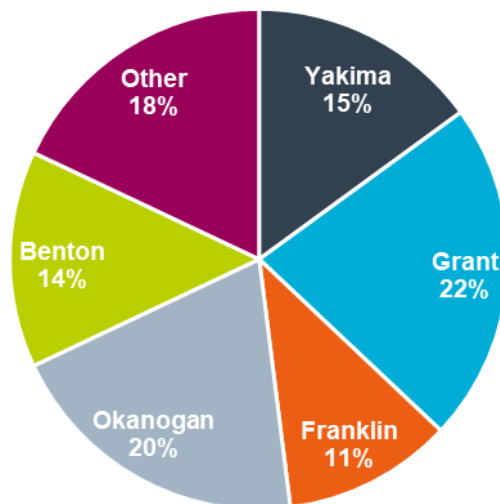
Exhibit 9: Washington Covered Farmworker Employment by County, 2018



Note: Based on three-year average June-July average employment estimates

Sources: Employment Security Department/LMEA; U.S. Bureau of Labor Statistics, QCEW; BERK, 2020

Exhibit 10: Washington H-2A Farmworker Requests by County, 2018

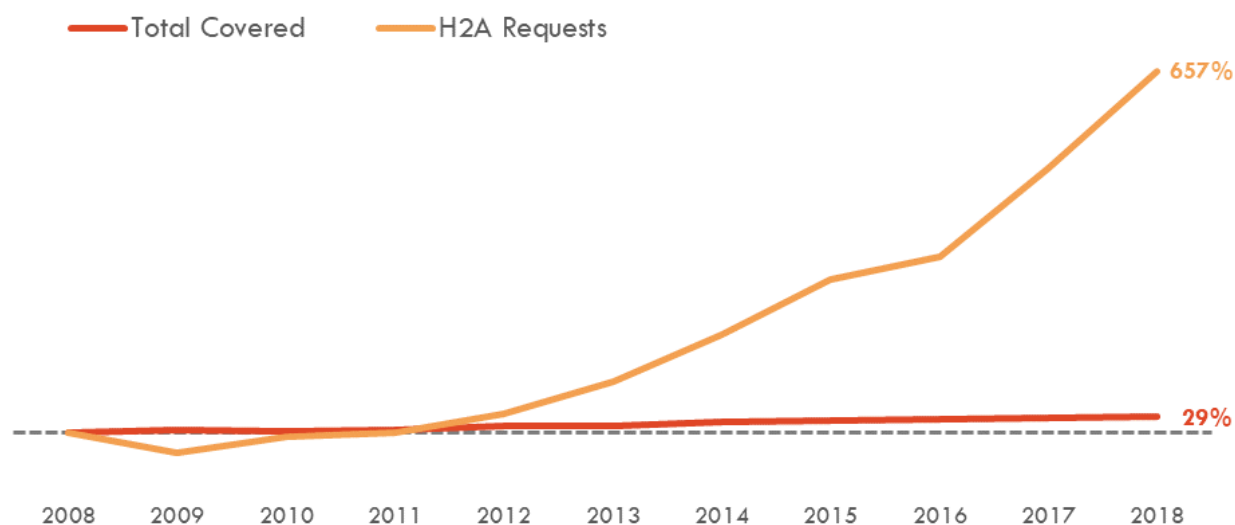


Sources: Department of Labor, Foreign Labor Certification Program, 2019; BERK, 2020

The 2006 Washington State Farmworker Housing Trust survey found that more than 75% of farmworkers were permanent Washington residents and 70% did not travel away from home for work. Of farmworkers surveyed, nearly 60% had worked in Washington agriculture for at least five years and 35% planned to continue to work in agriculture in Washington for at least five more

years. In addition, 1% reported working for the same employer or employers each year.⁵⁸ Since 2006, there has been an increase in H-2A applications in Washington, from 42 applications in 2008 to over 260 applications in 2018 (See Exhibit 11).⁵⁹

Exhibit 11: Growth Rates since 2008, H-2A Requested Workers and Covered Employment in Washington



Sources: Employment Security Department, Employment Connections Division - Foreign Labor Certification Program; BERK, 2020

Income

Annual agricultural wages vary dramatically by county, in part due to the nature of the farm work that counties offer. For example, in 2017, farmworkers in north-central Washington (Chelan, Douglas, Kittitas and Okanogan counties) earned an average of \$25,711, while those in the south-central area (Klickitat and Yakima counties) earned 20% more, on average, at \$30,721. See Exhibit 6 for a map of counties by region.⁶⁰

Despite this regional variation, statewide farmworker wages have grown over the past five years. When adjusted for inflation, average annual wages for covered farmworkers increased from \$25,143 in 2012 to \$28,991 in 2017.

⁵⁸ Washington State Farmworker Housing Trust, "A Sustainable Bounty: Investing in our Agricultural Future," (Washington State Farmworker Housing Trust), 2008.

⁵⁹ Washington State Employment Security Department, Employment Connections Division - Foreign Labor Certification Program.

⁶⁰ Washington State Employment Security Department, Agricultural Workforce Report.

Exhibit 12: Annual Growth Rates for Annual Wages of Covered Agricultural Employment, 2013-2017

Area	2013	2014	2015	2016	2017	Overall	YoY Avg. Annual
Western	3.1%	2.1%	-0.8%	0.0%	4.3%	9.0%	1.8%
South Central	2.2%	3.3%	0.8%	2.5%	7.6%	17.2%	3.2%
North Central	2.6%	1.5%	2.6%	3.6%	7.6%	19.0%	3.6%
Columbia Basin	-0.7%	4.4%	1.3%	2.0%	5.3%	12.6%	2.4%
South Eastern	1.3%	5.3%	1.7%	1.9%	4.7%	15.7%	3.0%
Eastern	3.0%	-2.1%	-6.0%	2.1%	7.2%	3.8%	0.9%
Statewide	1.8%	3.1%	1.1%	2.3%	6.2%	15.3%	2.9%

Sources: ESD Agricultural Workforce Report, 2019; BERK, 2020

For foreign farmworkers employed through the H-2A program, the Adverse Effect Wage Rate (AEWR), or the effective minimum wage for this population, was \$13.38 per hour in 2017 in Washington.⁶¹

Regardless of this increase, wages in the agricultural sector remain low. A few factors compound farmworkers' low wages. Even during peak employment, most farmworkers work less than 40 hours per week.⁶² Further, many migrant farmworkers have added expenses of supporting a family at home in addition to living expenses near their work sites (Abbett, 2005, p. 7).

⁶¹ Gustavo Avilés, Josh Moll, Toby Paterson, and Zoe Zadworny, "2017 Agricultural Workforce Report," (Washington State Employment Security Department, September 2019).

⁶² Janet Abbett, "Farmworker Housing in Washington State: Safe, Decent and Affordable," (Washington State Department of Community, Trade and Economic Development), 2005.

Statewide Housing Inventory

In Washington, housing for agricultural workers is counted by units for year-round employment and by beds for migrant workers, including covered employment and H-2A workers.

Year-round agricultural workers are assumed to occupy stable housing in their primary community's housing inventory. Certain groups in Washington provide subsidized housing specifically for farmworkers and their families. Outside of these specified units, farmworkers must compete in ownership and rental markets with all other residents.

Migrant farmworkers have less permanent housing needs. Often these accommodations are single-room occupancy buildings or congregate housing/bunkhouses and may be located on the farm or within cities or populated areas. Housing providers may be employers, nonprofits or housing authorities. As part of the H-2A worker program, employers must provide housing for their foreign workers, whether on-site or nearby. This means that available beds will first go to H-2A workers, then to covered migrant and year-round employees. Temporary worker accommodations are licensed through the state Department of Health.

In 2019, an estimated 30,359 beds were provided for migrant or H-2A farmworkers and 2,657 housing units were set aside for year-round farmworker households. Reflective of H-2A visa geographic distribution shown in Exhibit 10, Okanogan and Grant counties have the highest number of seasonal beds while Yakima County has the most permanent housing units. **Overall, these 33,016 accommodations compare to an estimated 102,304 total farmworkers in Washington, meaning that a potential 69,288 farmworkers compete in local housing markets for rental or ownership housing options.** This estimate likely over-counts housing need, since it is based on an employee-to-job ratio from national survey results. Housing needs are further complicated because households come in different sizes and makeups. The estimates assume that each employee represents a unique household, but in reality a single family may include multiple farmworkers and unrelated coworkers may choose to live together rather than individually.

The National Agricultural Workers Survey (NAWS) is an employment-based, random sample survey conducted by the U.S. Department of Labor. Results from the Northwest region in 2018 suggest that farmworkers typically hold more than one job, with migratory workers working more jobs than year-round employees.

Year-round workers: 1.26 jobs

Migratory workers: 1.95 jobs

Source: <https://www.dol.gov/agencies/eta/national-agricultural-workers-survey>

Exhibit 13: Estimate of Farmworker Housing by County, 2019

	Seasonal Beds	Permanent Units	Projects
Total	30,359	2,657	565
Grant	7,276	462	118
Okanogan	5,132	77	93
Yakima	4,637	948	102
Chelan	2,521	146	48
Franklin	2,506	145	40
Benton	2,363	89	39
Douglas	2,308	26	44
Whatcom	1,162	84	14
Adams	1,134	84	20
Klickitat	482	20	9
Skagit	461	240	19
Walla Walla	204	59	4
King	105	0	3
Clark	35	0	1
Pacific	17	0	2
Snohomish	16	0	2
Asotin	0	0	-
Clallam	0	0	-
Columbia	0	0	-
Cowlitz	0	138	4
Ferry	0	0	-
Garfield	0	0	-
Grays	0	0	-
Grays Harbor	0	0	-
Lewis	0	139	3
Mason	0	0	-
Pierce	0	0	-
Spokane	0	0	-
Whitman	0	0	-

Sources: Washington State Housing Finance Commission, 2019; Department of Health, 2019; Office of Rural and Farmworker Housing, 2020; BERK, 2020

Gap Analysis

Exhibit 14 estimates the quantity of stable and covered migratory farmworkers in Washington who must locate housing in the private market. In 2019, an estimated 30,359 beds were provided for migrant or H-2A farmworkers, and 2,657 housing units were set aside for year-round farmworker households. Overall, these 33,016 accommodations compare to an estimated 102,304 total farmworkers in Washington, meaning that a potential 69,288 farmworkers compete in local housing markets for rental or ownership housing options.

Our county profile summaries dive deeper into the income and housing cost ratios across the state to assess how well private markets meet the needs of these households.

Exhibit 14: Washington Housing to Workers Comparison by Employment Type, 2018

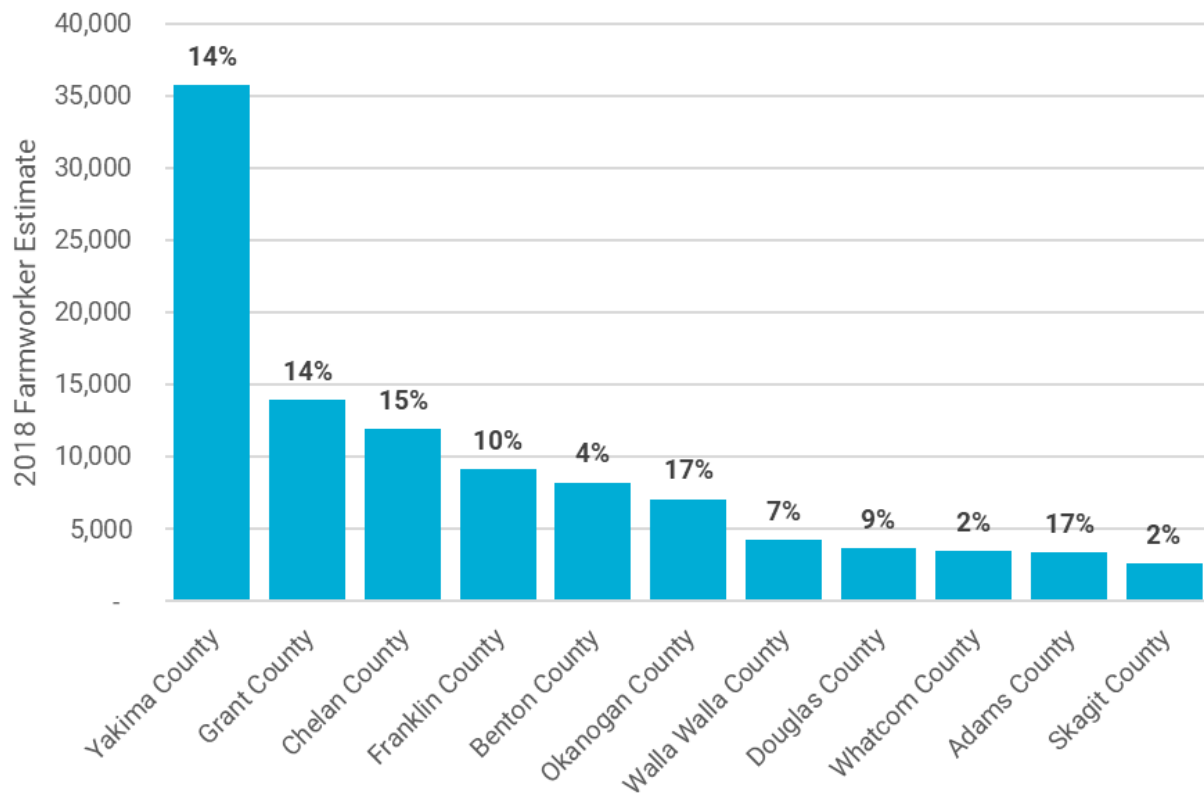
Employment Type	Estimated 2018 Jobs	Estimated 2018 Workers	Estimated 2018 Accommodations	Estimated 2018 Gap
Stable, Covered (Annual Average)	64,378	51,094	2,657 units	48,437
Migrant, Covered (Jun-Jul Average)	70,470	36,139	30,359 beds for variable and H-2A	20,851
H-2A Visa (Jun-Jul Average)	15,071	15,071		Mandatory provision

Note: These numbers assume that 75% of total H-2A worker requests are fulfilled. Job to employee estimates are based on the number of employers per worker, as found in the 2018 NAWS Survey by Northwest respondents

County Profiles

The following sections profile counties with the highest agricultural production and employment levels in Washington (see Exhibit 15). They cover all six ESD reporting regions and vary in size, crops produced and types of workers employed. Each profile summarizes key trends as they relate to housing needs for the particular region.

Exhibit 15: Farmworker Employment for Profiled Counties as Percent of Total County Population, 2018



Sources: OFM, 2019; Washington State ESD, 2019; U.S. Department of Labor, 2020; BERK, 2020

Exhibit 16 summarizes the total number of employees left to search in local markets for year-round and migratory housing options. Estimates for year-round covered employees begin with the total number of covered farm jobs, adjust for 1.26 jobs per worker, and subtract the number of farmworker-specific housing units. Migratory employment figures begin with the average number of jobs in June and July, adjust for 1.96 jobs per worker, and then subtract seasonal housing units beyond those provided to H-2A workers. **The highest numbers of domestic farmworkers searching locally for housing units are in Yakima and Chelan counties.**

Exhibit 16: Farmworkers Searching for Housing in Local Markets, 2018

County	Year-Round, Covered Employees	Migratory, Covered Employees	Rental Vacancy Rate
Adams	990	712	Insufficient data
Benton	2,754	2,716	2.6%
Chelan	5,222	3,305	1.4%
Douglas	1,202	70	1.4%
Franklin	2,204	2,936	2.6%
Grant	3,889	437	Insufficient data
Okanogan	1,475	170	Insufficient data
Skagit	1,138	238	0.5%
Walla Walla	1,646	1,313	0.2%
Whatcom	960	602	0.2%
Yakima	15,425	8,620	1.4%

*Based on average monthly wages by region and countywide average rental rates for a 2-bedroom apartment. HUD considers households cost-burdened when 30% or more of income goes toward housing.

Sources: Covered employment and wage estimates from Washington ESD, 2018. Farmworker housing counts from Washington State Housing Finance Commission, 2019; Department of Health, 2019; and Office of Rural and Farmworker Housing, 2020. Average rents and vacancy rates as reported by Washington Center for Real Estate Research, 2018. BERK, 2020

Rental vacancy rates are an effective metric for estimating tightness in a real estate market.

Nationally, rental vacancy rates have averaged 5-10% in the past 50 years.⁶³ Lower vacancy rates make it more challenging for workers who earn less or need specialty lease agreements to compete for available units (such as shorter periods, which migratory workers are likely to request). Vacancy rates are low across all counties profiled, particularly in Walla Walla, Whatcom and Skagit. The stock of rental units is too low to calculate in Adams, Grant and Okanogan counties.

Housing affordability is a statewide concern. From 2012-2018, housing costs increased 52% and rents increased 57% statewide.⁶⁴ These increases vary across communities, but income growth has not kept pace with housing costs. **For profiled counties, estimated wages are least compatible with average rents in Chelan and Douglas counties.** Exhibit 17 summarizes these trends. The third column calculates the percent of the estimated farmworker income required to rent an average apartment in the area. The higher the percentage, the lower the remaining budget for other needs such as food, transportation or healthcare. In Chelan and Douglas counties, farmworkers spend an estimated two-thirds of their income on housing.

Exhibit 17: Housing Affordability for Farmworkers, 2020

County	Farmworker Wages as a Percent of HUD-area MFI	Percent of Income Spent to Afford Average Apartment*
Adams	57%	n/a
Benton	41%	36%
Chelan	40%	66%
Douglas	40%	66%
Franklin	41%	36%
Grant	50%	n/a
Okanogan	52%	n/a
Skagit	44%	39%
Walla Walla	46%	34%

⁶³ Lincoln Land Institute, "The Empty House Next Door," (2018), <https://www.lincolnst.edu/publications/policy-focus-reports/empty-house-next-door>

⁶⁴ Washington Center for Real Estate Research, "Q4 Housing Reports and Spring Apartment Surveys," (2012, 2018).

Whatcom	39%	42%
Yakima	58%	31%

Sources: Farmworker wage estimates from Washington ESD, 2019. HUD-area MFI as reported by Washington Housing Finance Commission, 2020. Rental rates from Washington Center for Real Estate Research, 2020. BERK, 2020.

*Average 2-bedroom, 1-bathroom apartment

Adams County

Key Takeaways



As many as **1,702** farmworker households search for housing through local, market rate options in Adams County.



Forty-two percent (42%) of this need is for migratory workers, who have more unique and potentially term-limited housing needs. This is complicated by the reality that there is a very limited stock of multifamily housing in Adams County, fewer than 1,000 units countywide. It is likely that many of these workers are living in less permanent forms of housing, such as mobile homes, as these comprise a quarter of the local housing stock.

In 2018, Adams County had...



1,353 year-round agricultural jobs.

Farmworker housing resources in the area offered housing units to 8% of estimated workers.

Permanent Housing (units)

1,074 Estimated Workers
 - 84 Provided Units
990 Estimated Gap



3,087 migratory jobs available during peak months.

Provided housing covers 45% of estimated local workers. The remaining 712 competed for housing in the rental market along with 2,151 renter households of Adams County.

Seasonal Housing (beds)

1,846 Estimated Workers
 - 1,134 Provided Beds
712 Estimated Gap



Housing affordability is a challenge for farmworkers. Average annual wages for farmworkers are below the median family income for all household sizes, at 57% MFI overall. The average home value results in cost burden for farmworker wages.



It is likely that many farmworker households are renters. **There are very few rental units in the area that can accommodate families with 4+ people, a common household size in Adams County.** Farmworker families may struggle to secure adequate accommodation at an affordable rate.

Introduction

Adams County is part of the Columbia Basin reporting area, situated between Grant and Whitman counties to the west and east, respectively, and Lincoln and Franklin counties to the north and south. Interstate 90 and Highway 395 are two primary transportation routes through the county, connecting many of the incorporated areas. There are 586 farms and more than 842,000 acres of agricultural lands spanning Adams County, with irrigated crops primarily in the west.⁶⁵

Adams County is Washington's seventh most productive county for agriculture, measured by the value of production, and is ranked 11th for year-round agricultural employment. Major crops grown include potatoes, wheat and apples.⁶⁶ Other major sectors of employment are government services and manufacturing.⁶⁷

The county has a population of 20,150, with almost half of its residents living in unincorporated areas.⁶⁸ Othello is the largest city, with more than 40% of the county population and three-quarters of incorporated residents. The county seat and second-largest city by population is Ritzville. Farmworker housing units are clustered in and around Othello, which is on the western side of the county. This is likely helpful for residents that are more permanent who need to access amenities in the town centers. However, it may result in long commutes to farming operations on the east side of the county.

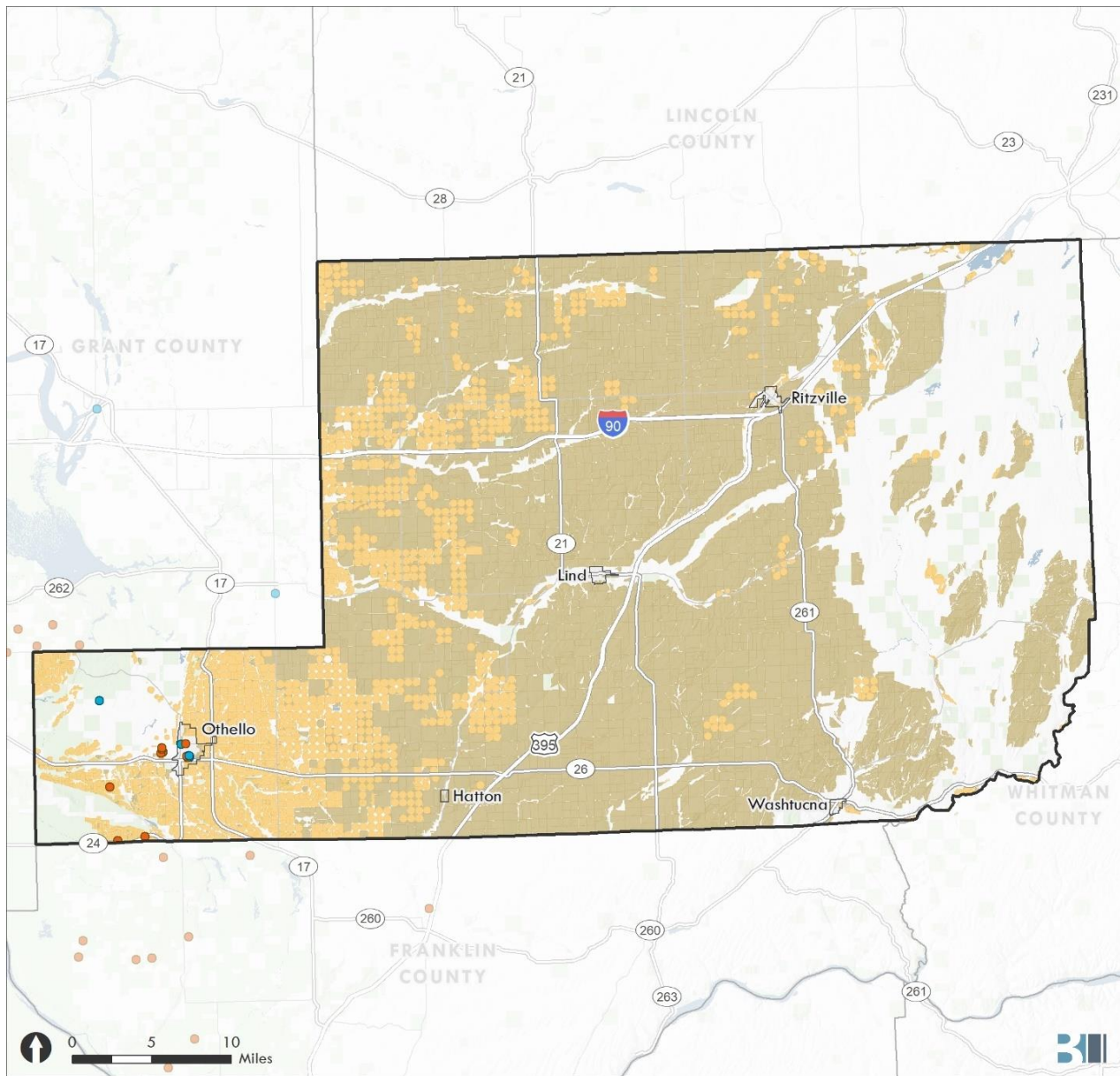
⁶⁵ Washington State Department of Agriculture, "Washington Agriculture Snapshot," (October 2021), <https://cms.agr.wa.gov/WSDAKentico/Documents/Pubs/641-WSDAAgInfographic-WEB.pdf?/641-WSDAAgInfographic-WEB>

⁶⁶ Washington State Department of Agriculture, 2012.

⁶⁷ ESD, Average annual employment by 2-digit NAICS codes, 2018.

⁶⁸ Office of Financial Management, 2019.

Exhibit 18: Adams County Agricultural Land and Farmworker Housing Units, 2019



- | | |
|---------------------------------|----------------------|
| Farmworker Housing Type: | Other Layers: |
| ● Migrant | □ County Boundary |
| ● Year-Round | □ Cities |
| Agriculture Type: | □ Tribal Land |
| ■ Irrigated | ■ Public Ownership |
| ■ Non-Irrigated/Unknown | |



Sources: Housing Data from Washington DOH, 2019; Washington State Housing Finance Commission, 2019; Office of Rural and Farmworker Housing, 2019; WSDA, 2019

Population Summary

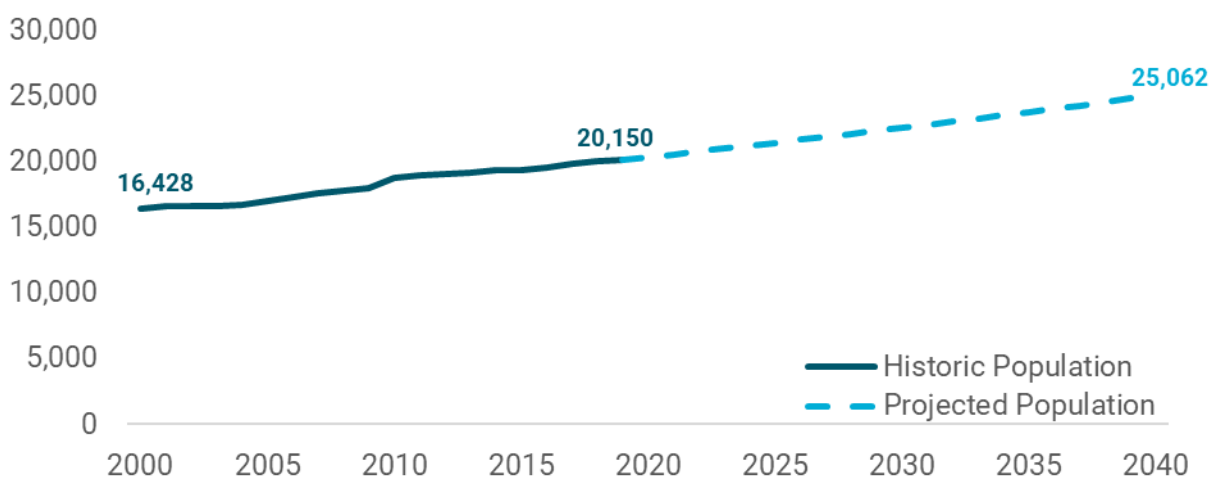
Adams County has a population of 20,150, a 23% increase since 2000. Medium OFM population projections estimate continued growth patterns to 2040, as shown in Exhibit 19 and Exhibit 20. Demographic projections for Adams County estimate a relatively stable proportion of age cohorts, with slightly higher proportions of adults 45 and older offset by 4% fewer youth aged 0-19. A higher proportion of the population at or above retirement age may represent higher demand for healthcare services, mobility assistance and ADA-compliant home design features. The primary age group for farmworkers, 20-44, is predicted to remain relatively stable as a proportion of the population throughout this period.

Exhibit 19: Adams County Historical and Projected Growth Rates, 2000-2040

Average Annual Growth	2000-2019	2019-2040 Projected
Individuals	196	234
Percentage	1.2%	1.2%

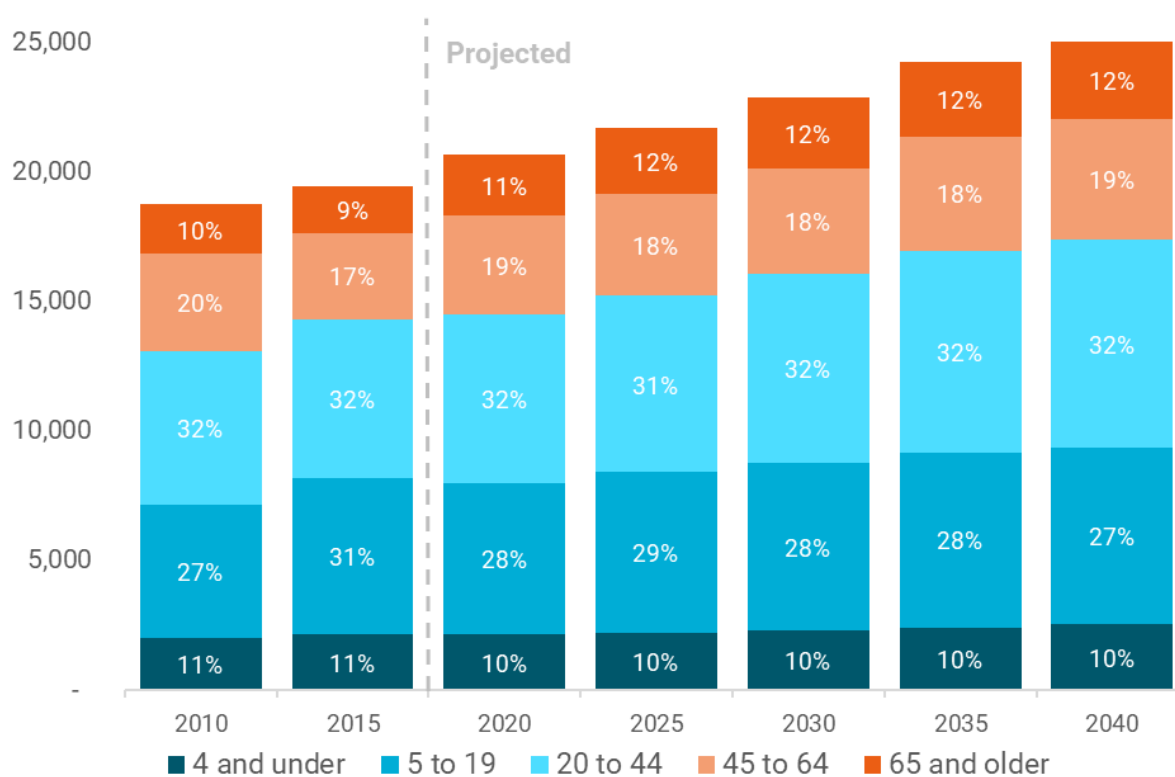
Sources: Washington Office of Financial Management, 2019; BERK, 2020

Exhibit 20: Adams County Historical and Projected Population, 2000-2040



Sources: Washington Office of Financial Management, 2019; 2017 GMA Projections, Medium Series; BERK, 2020

Exhibit 21: Adams County Population by Age Cohort, Historical and Projected



Sources: Washington Office of Financial Management, 2018; BERK, 2019

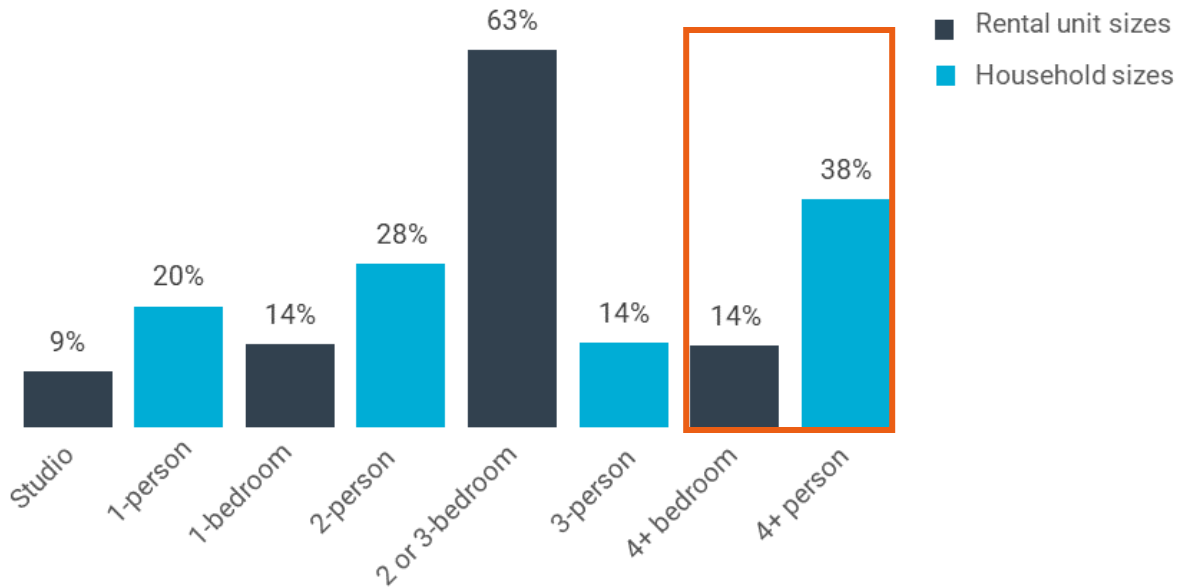
Household Population

The average household size in Adams County is 3.3 individuals.⁶⁹ Almost 40% of Adams County households, or 2,151 households, are renters. Survey data suggests that this rate is higher among the farmworker population whose migratory patterns and lower annual earnings (see Exhibit 27) are more compatible with rental housing. This may result in a mismatch of household size and housing stock for agricultural workers who rent and live with children or extended family members, further explored in Exhibit 22. Two- and three-bedroom units represent the majority of rental units available in Adams County. However, 38% of households have four or more members and may desire housing with more bedrooms. Larger multifamily units with 4+ bedrooms are limited in the rental market (in Adams County, only 14% of rental units are this size), increasing the likelihood of overcrowding and “bunking up” arrangements if households cannot afford to

⁶⁹ American Community Survey, Table DP02 5-year Estimates, 2014-2018.

purchase a home.⁷⁰

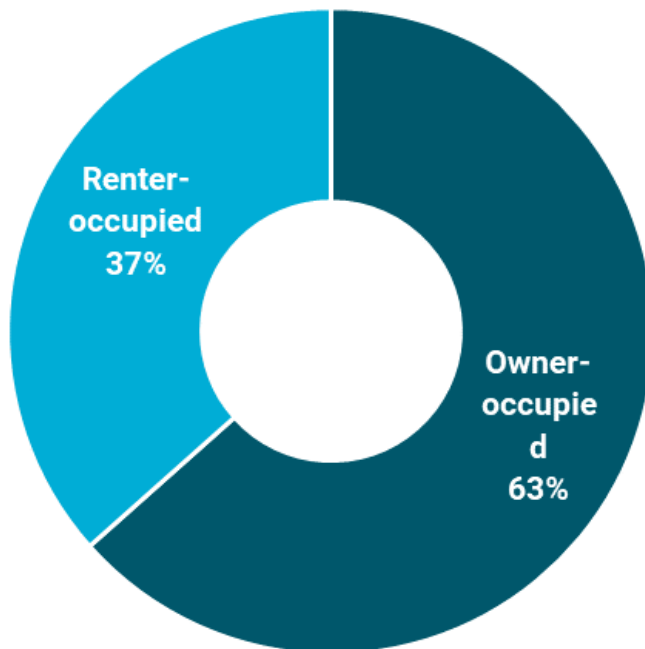
Exhibit 22: Adams County Household Sizes and Rental Housing Unit Sizes



Sources: American Community Survey S2501 and S2504 5-Yr Estimates, 2014-2018; BERK, 2020.

⁷⁰ American Community Survey, Table S2504 5-year Estimates, 2014-2018.

Exhibit 23: Adams County Household Housing Tenure, 2018



Sources: American Community Survey Table S2501 5-year Estimates, 2014-2018; BERK, 2020

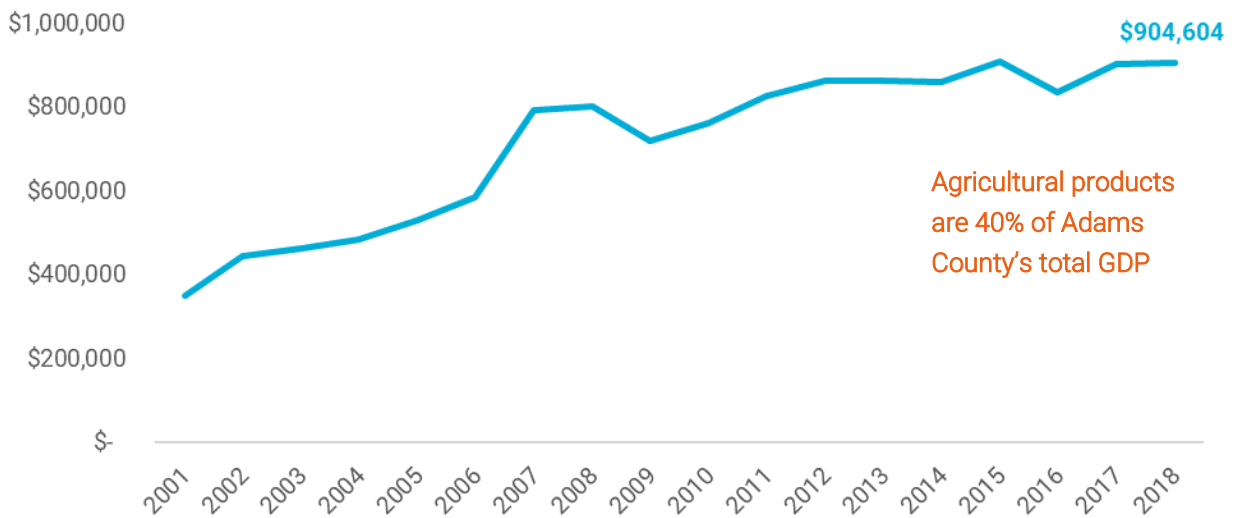
County Economy

In Adams County, covered farmworkers make up **15% of the labor force**. Agricultural products, however, comprise 40% of total gross domestic product (GDP). This is a large percentage compared to other counties.

- Adams County is one of two counties in ESD’s Columbia Basin Area where workers earn less than the statewide average annual farmworker wages.
- Top employers for Adams County include McCain Foods, Othello School District, Simplot French Fries and Columbia Basin Health Association.⁷¹

⁷¹ Adams County Development Council, “Leading Industries,” (2013), <https://growadamscounty.com/leading-industries/>

Exhibit 24: Adams County GDP, All Industries

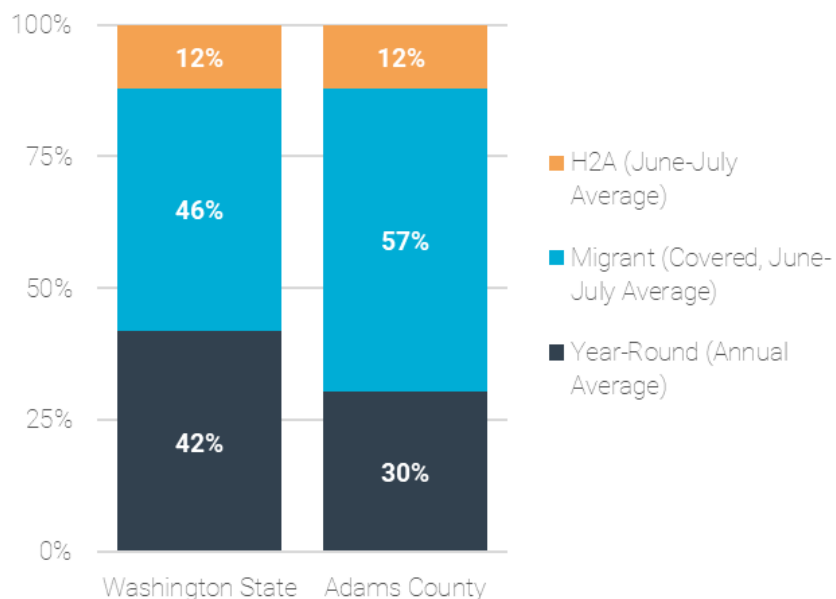


Sources: U.S. Bureau of Economic Analysis (BEA) SAGDP9N series, 2001-2018; BERK, 2020

Farmworker Population

As of 2018, Adams County is home to an estimated **1,353 year-round and covered agricultural jobs**. This number more than triples during the peak months for migrant employment, which is April through October. Compared to statewide averages, Adams County relies more on migrant workers and less on year-round employment. These workers may struggle the most to secure adequate housing during the peak months for labor.

Exhibit 25: 2018 Agricultural Employment by Type, County versus State Averages



Sources: Washington Employment Security Department, 2019; U.S. Department of Labor, 2020; BERK, 2020

Exhibit 26: Adams County Farmworker Estimates by Employment Type, 2018

Employment Type	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Year-round	1,257	1,275	1,292	1,310	1,327	1,345	1,362	1,380	1,397	1,414	1,432	1,449
Migrant covered	347	603	808	1,427	1,852	2,808	2,285	2,294	2,338	1,644	532	110
Migrant H-2A*	208	283	291	354	599	615	465	358	255	16	0	0
Total estimated monthly employment	1,812	2,161	2,391	3,091	3,778	4,768	4,112	4,032	3,990	3,074	1,964	1,559

*Statewide requests provided by ESD and discounted 75% to reflect actual versus requested workers; County estimates based on Department of Labor percentages of worker requests by county

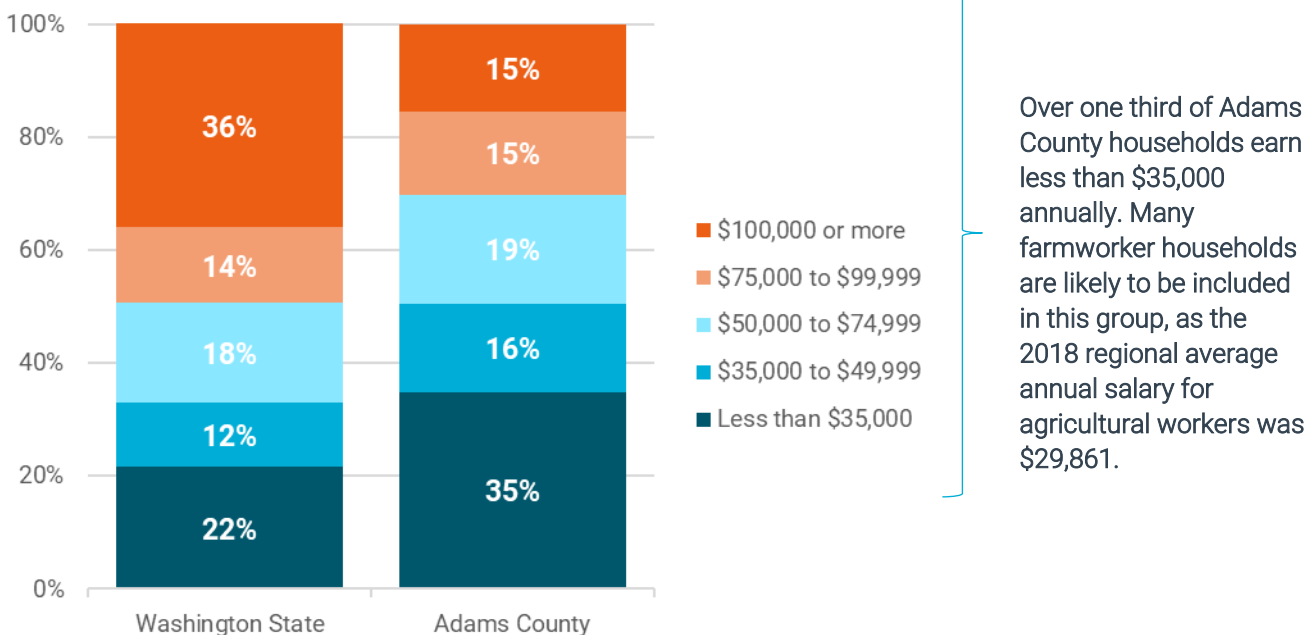
Sources: Employment Security Department, Employment Connections Division - Foreign Labor Certification Program; BERK, 2020

Income Summary

Adams County households have lower incomes than state averages. There is both a higher percentage of households earning less than \$50,000 per year and a lower percentage of households earning greater than \$100,000 per year. Based on ESD income and wages reporting, farmworker households are likely to earn less than \$35,000 per year without additional income

contributed from secondary employment or other household members. This income level is also well below the HUD-area median family income for 2018, which was \$52,400.

Exhibit 27: State and Adams County Household Income Brackets



Sources: American Community Survey S1901 5-Yr Estimates, 2014- 2018; BERK, 2020

Estimated wages for farmworkers are below the median family income (MFI) for Adams County at any family size. **A single-person household earning the regional average for farmworkers earns 57% of MFI in Adams County, classified as low-income (50-79% MFI).**

- Median family income for Adams County (2018 - HUD): \$52,400
- Average annual income for Columbia Basin farmworkers (2018):⁷² \$29,861

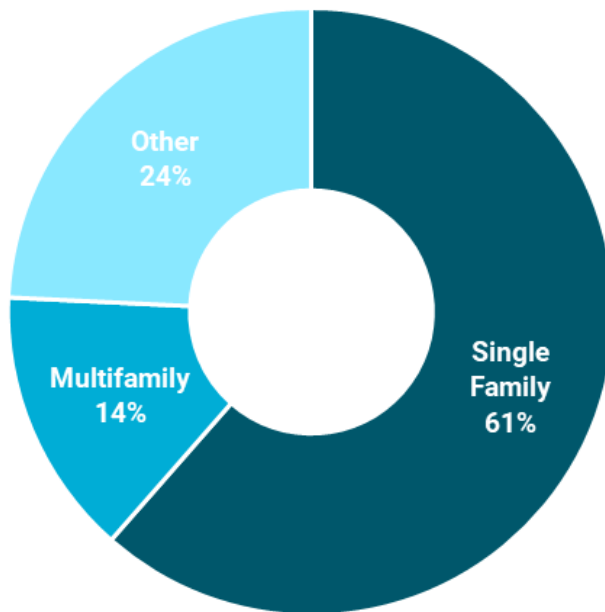
Housing Inventory

There are 7,762 housing units in Adams County. Twenty-four percent of these are classified as “other,” including mobile homes and other special housing types, compared to a statewide average of 8%. This high percentage may correlate to the high number of farmworkers living in

⁷² 2018 average wages projected based on average annual growth rates over five years, as reported by ESD, 2019.

more temporary housing types in the county. There are less than 1,000 units of multifamily housing available in the county. If no other households competed for these units, they would still only cover 24% of year-round and migratory covered farmworker jobs during peak season.

Exhibit 28: Total Housing Units by Type, Adams County 2018



Sources: Washington State OFM, 2018; BERK, 2020

Given the regional average annual wages for farmworkers, housing is considered affordable at rates of \$747 per month or less. However, in recent years, housing prices in Adams County have risen 47%, while regional farmworker incomes have increased 15%. See Exhibit 29. This trend has intensified affordability issues for these residents.

Exhibit 29: Adams County, Percent Change for Farmworker Wages versus Housing Prices, 2012-2018



Sources: Washington ESD, 2020; Washington Center for Real Estate Research, 2012 & 2018; BERK, 2021

Rental Housing

There are not enough rental housing units in Adams County for inclusion in Washington Center for Real Estate Center’s bi-annual reporting.

Home Ownership

The median price of a home in Adams County is \$190,000.⁷³ For a farmworker household earning annual average wages, the estimated mortgage payment on this price of a home results in a cost burden, and the family may not be approved for a loan in the first place. A more affordable range of ownership housing on farmworker income would be \$160,000 or less, assuming the ability to save for a \$32,000 (20%) down payment. Approximately 42% of Adams County housing units are available in this price range. However, this down payment will be out of reach for many families, and as down payment size decreases, monthly mortgage payments increase.

⁷³ Ibid.

Benton County

Key Takeaways



As many as **5,470** farmworker households search for housing through local, market rate options in Benton County.



Fifty percent (50%) of this need is for migratory workers, who have more unique and potentially term-limited housing needs.

In 2018, Benton County had...



3,583 year-round agricultural jobs.

Farmworker housing resources in the area offer housing units to 3% of estimated workers.



8,085 migratory jobs available during peak months.

Provided housing covers 14% of estimated local workers. The remaining 2,716 compete in the local housing market, where affordability is a major challenge and the rental vacancy rate is low.

Permanent Housing (units)

2,843 Estimated Workers
- 89 Provided Units

2,754 Estimated Gap

Seasonal Housing (beds)

5,079 Estimated Workers
- 2,363 Provided Beds

2,716 Estimated Gap



Housing affordability is a challenge for farmworkers. Average annual wages for farmworkers are well below the median family income for all household sizes. Households with 3+ members would be considered very low-income by regional standards. The average home value results in severe cost burden for farmworker wages and very few rental or ownership units are within an affordable range.



It is likely that many farmworker households are renters. **There are very few rental units in the area that can accommodate families with 4+ people, a common household size in Benton County, and even 1-bedroom units would result in cost burden for farmworker wages.** Farmworker families may struggle to secure adequate accommodation at an affordable rate.

Introduction

Benton County is part of the southeastern reporting area, wrapped on three sides by the Columbia River and bordered by Yakima and Klickitat counties to the west. Interstate 82 and Highway 240 are the primary routes through the county, connecting many incorporated areas. There are 1,520 farms and over 479,000 acres of agricultural lands, most prevalent in the southern part of the county.⁷⁴

Benton County is Washington's third most productive county for agriculture, measured by the value of production, and is ranked fourth for year-round agricultural employment. The most prevalent crops grown include potatoes, apples and grapes.⁷⁵ Other major employment sectors are government services, healthcare and social assistance, and administrative and waste services.⁷⁶ Waste services employment is largely tied to the Hanford Nuclear Site outside Richland.

The county population is 201,800.⁷⁷ Kennewick and Richland are the largest population centers, combining to house more than 70% of the county's population. Prosser is the county seat.

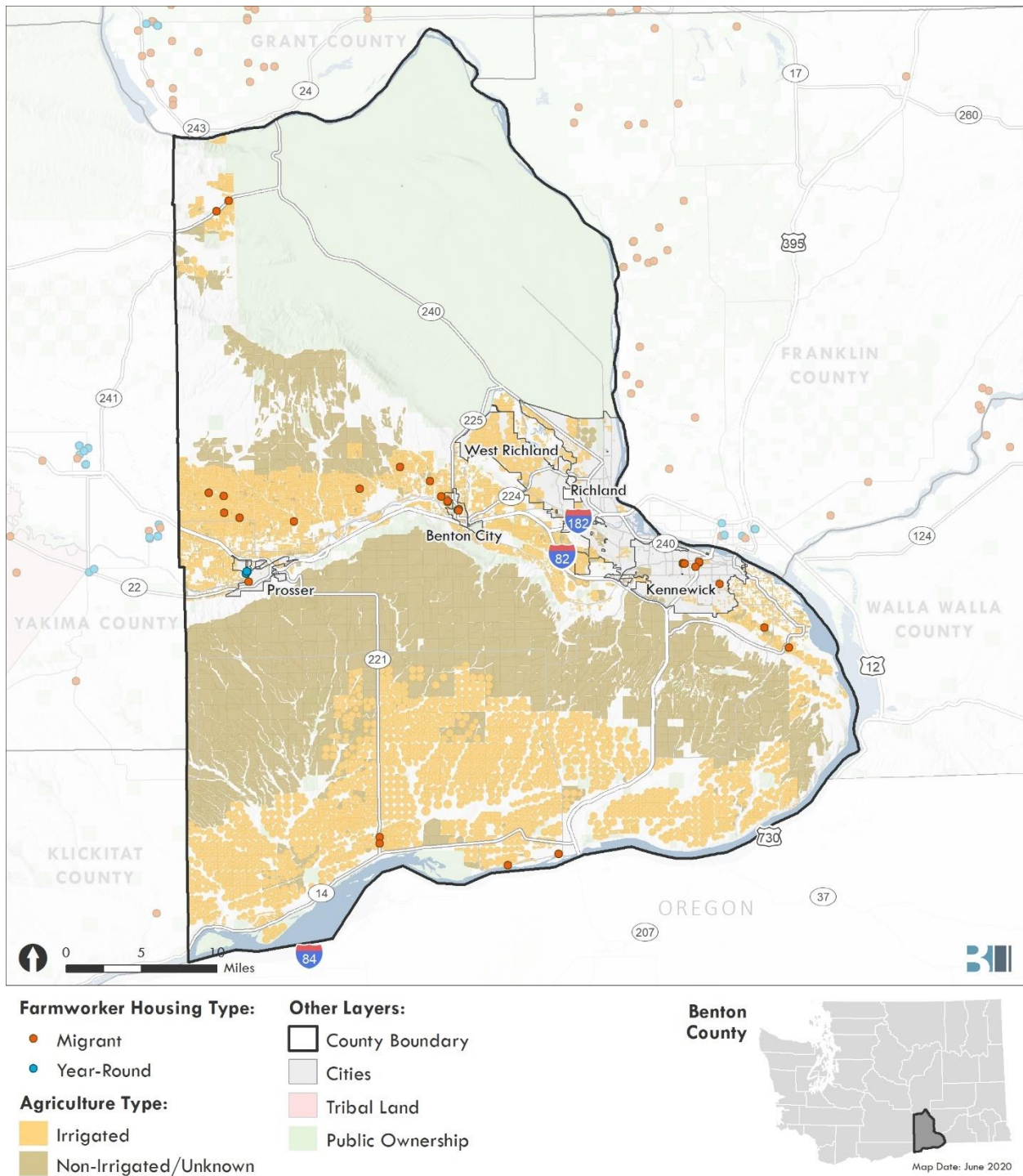
⁷⁴ Washington State Department of Agriculture, "Washington Agriculture Snapshot," (October 2021)

⁷⁵ Washington State Department of Agriculture, 2012.

⁷⁶ Washington State Employment Security Department, Average annual employment by 2-digit NAICS codes, 2018.

⁷⁷ Office of Financial Management, 2019.

Exhibit 30: Benton County Agricultural Land and Farmworker Housing Units, 2019



Sources: Housing data from Washington DOH, 2019; Washington Housing Finance Commission, 2019; Office of Rural and Farmworker Housing, 2019; WSDA, 2019

Population Summary

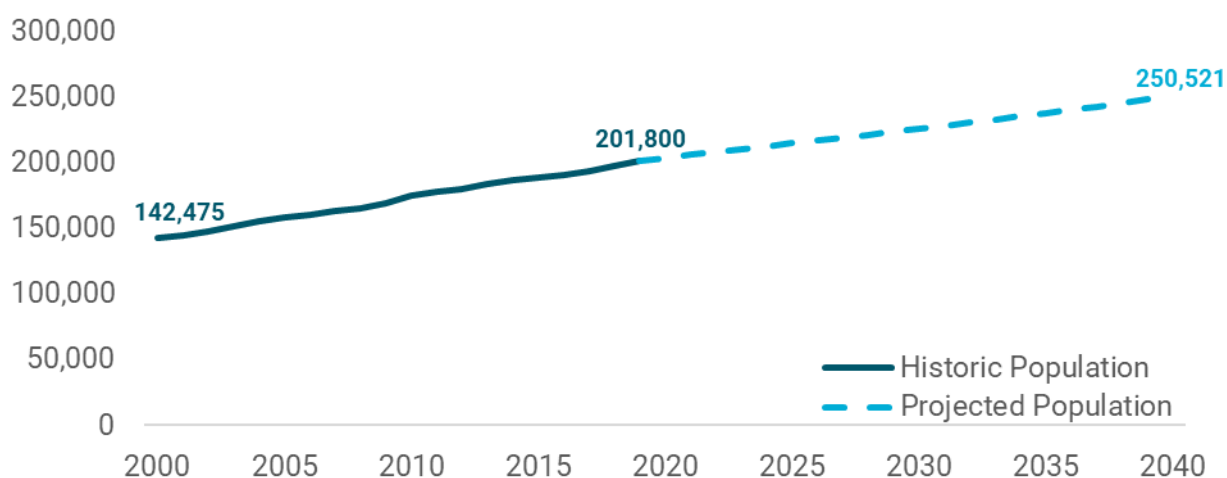
Benton County has experienced dramatic growth over the past decade, with a 42% population increase from 2000 to 2019. Medium OFM population projections estimate continued growth, although at a decelerated pace, to 2040, as shown in Exhibit 139 and Exhibit 140. Demographic projections for Benton County forecast an increased proportion of older adults (65+) as the Baby Boomer generation retires, with slightly lower proportions of all other age cohorts, except infants and young children (4 years old and younger). A higher proportion of the population at or above retirement age may represent greater demand for healthcare services, mobility assistance and ADA-compliant home design features. The primary age group for farmworkers, 20-44, is predicted to decrease slightly (2%) as a proportion of the population throughout this period.

Exhibit 31: Benton County Historical and Projected Growth Rates, 2000-2040

Average Annual Growth	2000-2019	2019-2040 Projected
Individuals	3,122	2,320
Percentage	2.2%	1.1%

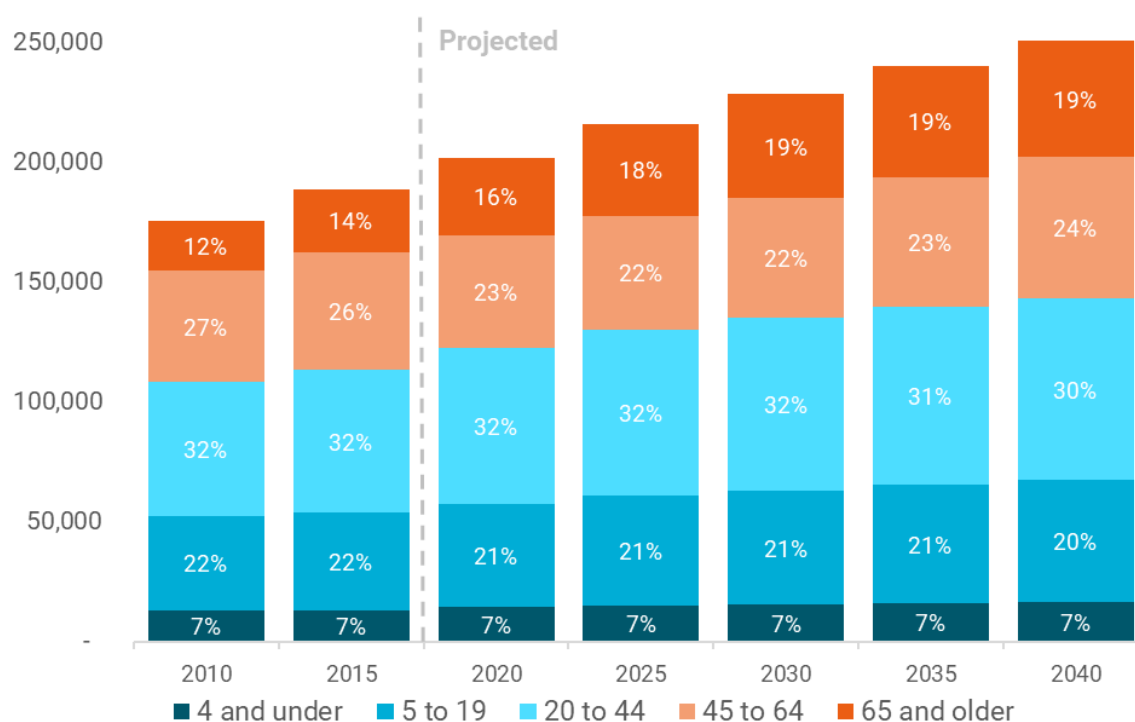
Sources: Washington State Office of Financial Management, 2019; BERK, 2020

Exhibit 32: Benton County Historical and Projected Population, 2000-2040



Sources: Washington State Office of Financial Management, 2019; GMA 2017 Projections, Medium Series; BERK, 2020

Exhibit 33: Benton County Population by Age Cohort, Historical and Projected



Sources: Washington Office of Financial Management, 2018; BERK, 2020

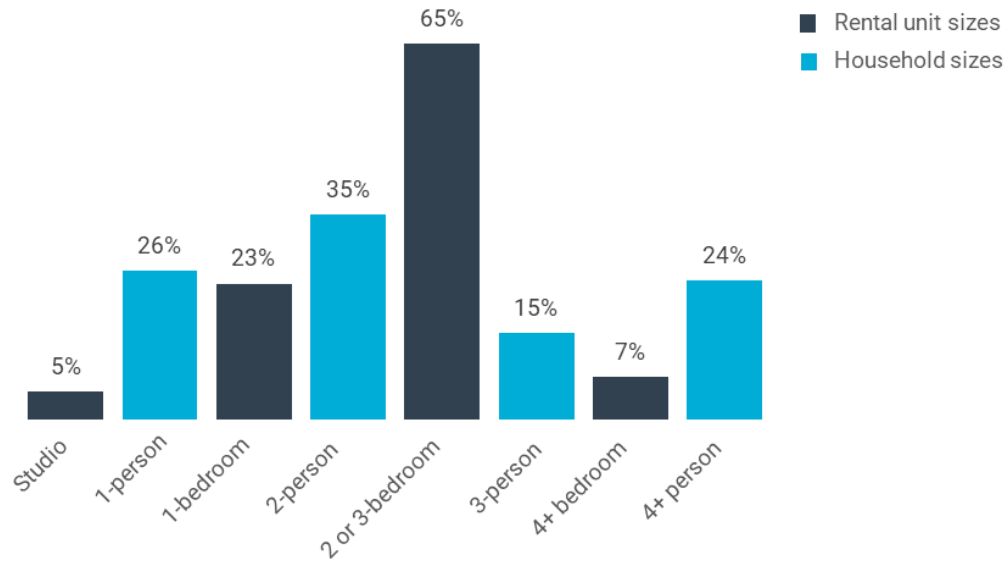
Household Population

The average household size in Benton County is 2.7 people.⁷⁸ Farmworker households are likely to reflect the general overall trend of household sizes in Benton County. One-third (32%) of Benton County households, or 22,461 households, are renters. Survey data suggests that this rate is higher among the farmworker population, whose migratory patterns and lower annual earnings (see Exhibit 39) are more compatible with rental housing. This may result in a mismatch of household size and housing stock for agricultural workers who rent and live with children or extended family members, further explored in Exhibit 34. Two- and three-bedroom units represent the majority of rental units available in Benton County. **One quarter (24%) of the population, however, will desire more space to accommodate four or more household members. Larger multifamily units with 4+ bedrooms are limited in the rental market (in Benton County, only 7% of rental units are this size), increasing the likelihood of overcrowding and “bunking up”**

⁷⁸ American Community Survey, Table DP02 5-year Estimates, 2014-2018.

arrangements if households cannot afford to purchase a home.⁷⁹

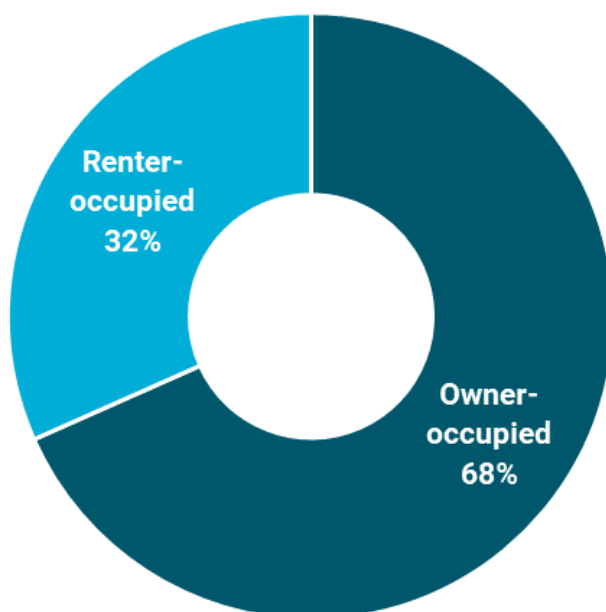
Exhibit 34: Benton County Household Sizes and Rental Unit Sizes



Sources: American Community Survey S2501 and S2504 5-Yr Estimates, 2014-2018; BERK, 2020

⁷⁹ American Community Survey, Table S2504 5-year Estimates, 2014-2018.

Exhibit 35: Benton County Housing Tenure by Household, 2018



Sources: American Community Survey Table S2501 5-year Estimates, 2014-2018; BERK, 2020

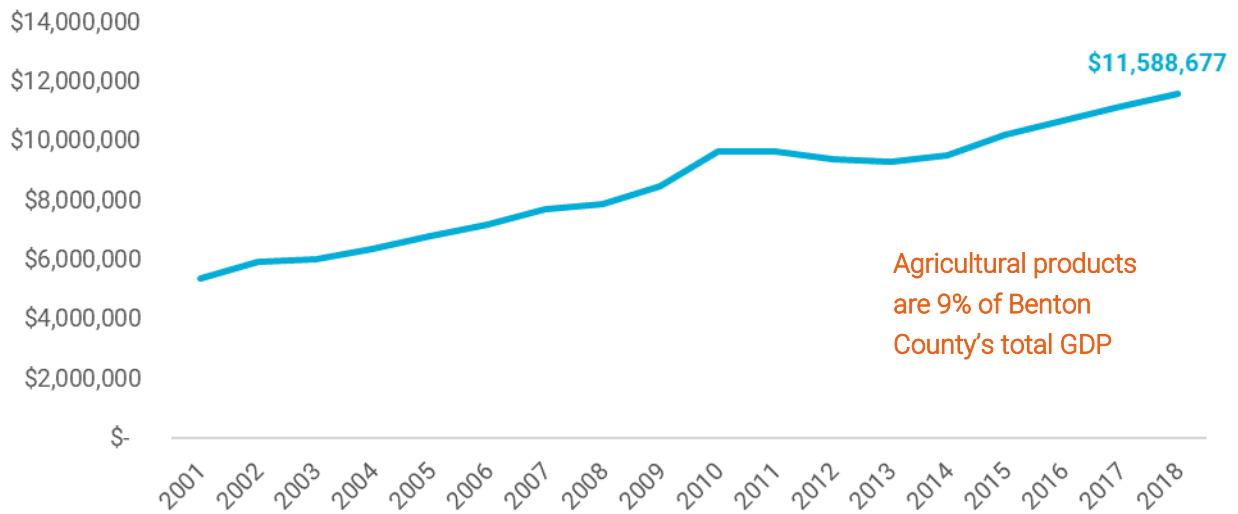
County Economy

Agriculture is smaller proportionally to Benton County's overall economy, as many top employers focus on energy and engineering tied to the Hanford site. Agricultural employment makes up **4% of the labor force**, and agricultural products are valued at 9% of total GDP.

- Benton County is one of three counties in ESD's south eastern area, along with Franklin and Walla Walla counties. Farmworker earnings here are slightly above the statewide average for annual farmworker wages in Washington.
- Top employers include Pacific Northwest National Laboratory, Aecom, Kadlec Medical Center and Bechtel National.⁸⁰

⁸⁰ Benton-Franklin Council of Governments, "Major Employers Report," (2014), <http://www.prosser.org/wp-content/uploads/2014/11/BFCOG-2014-Major-Employers.pdf>
Tri-City Herald, "Aecom finalizes \$6-billion URS purchase," (2014), <https://www.tricityherald.com/news/local/hanford/article32202939.html>

Exhibit 36: Benton County GDP, All Industries

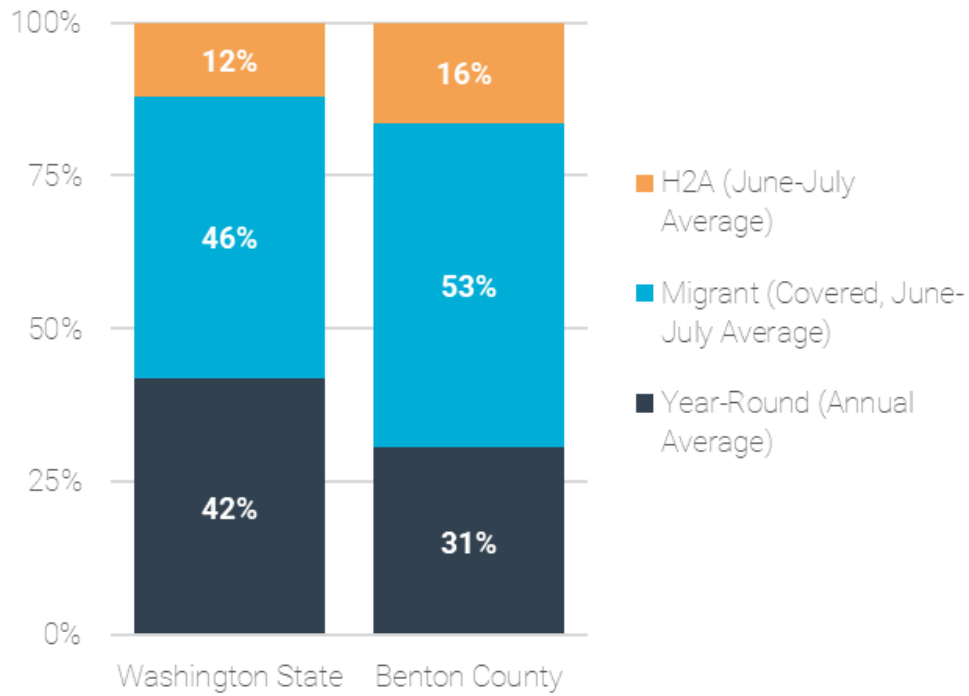


Sources: U.S. Bureau of Economic Analysis (BEA) SAGDP9N series, 2001-2018; BERK, 2020

Farmworker Population

As of 2018, Benton County is home to an estimated **3,583 year-round and covered agricultural jobs**, which more than doubles during the peak months for migrant employment in March through August. Compared to statewide averages, Benton County relies heavily on migrant employment, particularly H-2A workers.

Exhibit 37: 2018 Agricultural Employment by Type, County versus State Averages



Sources: Washington Employment Security Department, 2019; U.S. Department of Labor, 2020; BERK, 2020

Exhibit 38: Benton County Farmworker Estimates by Employment Type, 2018

Employment Type	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Year-round	3,515	3,528	3,541	3,554	3,566	3,578	3,590	3,601	3,612	3,624	3,635	3,646
Migrant covered	852	1,799	1,967	2,694	2,714	8,014	4,326	3,623	3,321	2,734	1,155	724
Migrant H-2A*	999	1,062	2,412	2,192	2,278	2,292	1,538	1,339	132	4	4	1
Total estimated monthly employment	5,366	6,389	7,920	8,440	8,558	13,884	9,454	8,563	7,065	6,362	4,794	4,371

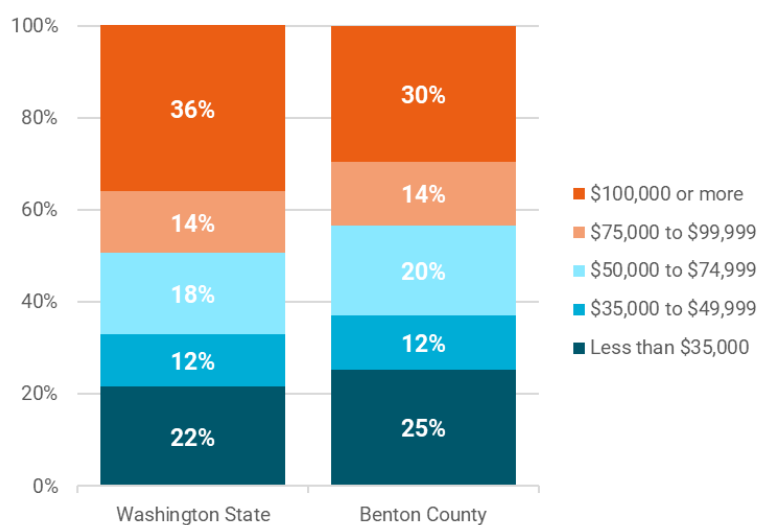
*Statewide requests provided by ESD and discounted 75% to reflect actual versus requested workers; County estimates based on Department of Labor percentages of worker requests by county

Sources: Employment Security Department, Employment Connections Division - Foreign Labor Certification Program; BERK, 2020

Income Summary

Benton County household incomes largely mimic statewide trends. There is a slightly higher percentage of households earning less than \$35,000 per year and a slightly lower percentage of households earning more than \$100,000 per year. Based on ESD income and wages reporting, farmworker households are likely to earn less than \$35,000 per year without additional income contributed from secondary employment or other household members. This income level is less than half of the HUD-area median family income for 2018: \$72,800.

Exhibit 39: State and Benton County Household Income Brackets



One quarter of Benton County households earn less than \$35,000 annually. Many farmworker households are likely to be included in this group, as the 2018 regional average annual salary for agricultural workers was \$30,133.

Sources: American Community Survey S1901 5-Yr Estimates, 2014- 2018; BERK, 2020

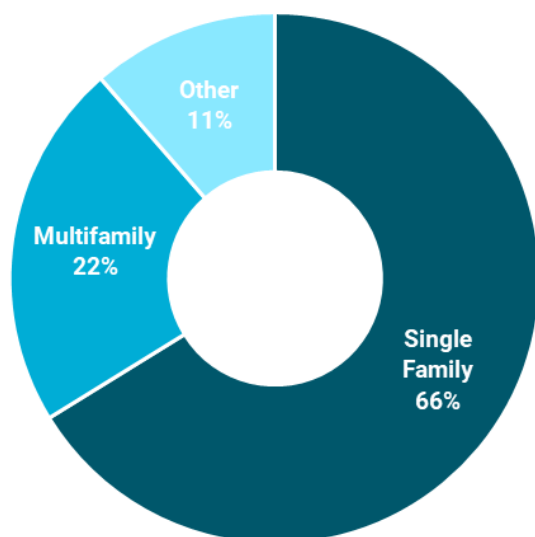
Estimated wages for farmworkers are below the median family income (MFI) for Benton County, at any family size. A household earning the regional average for farmworkers earns 41% of MFI in Benton County, classified as very low-income (30-49% MFI) with three or more members and low-income for a single person or 2-person household.

- Median family income for Benton County (2018 - HUD): \$72,800
- Average annual income for south-central farmworkers (2018):⁸¹ \$30,133

Housing Inventory

There are 77,512 housing units in Benton County. Sixty-six percent are single-family, which roughly correlates with the proportion of owner-occupied units in the county. Housing affordability is likely a significant challenge for farmworker households in this area, as average rental rates are not affordable for farmworker wages, even for 1-bedroom units. There is a low rental vacancy rate, 2.6% here compared to 4.3% statewide, indicating a tight and competitive rental market. Ninety-four percent of homes for sale are also at rates unaffordable for farmworker wages.

Exhibit 40: Total Housing Units by Type, Benton County 2018



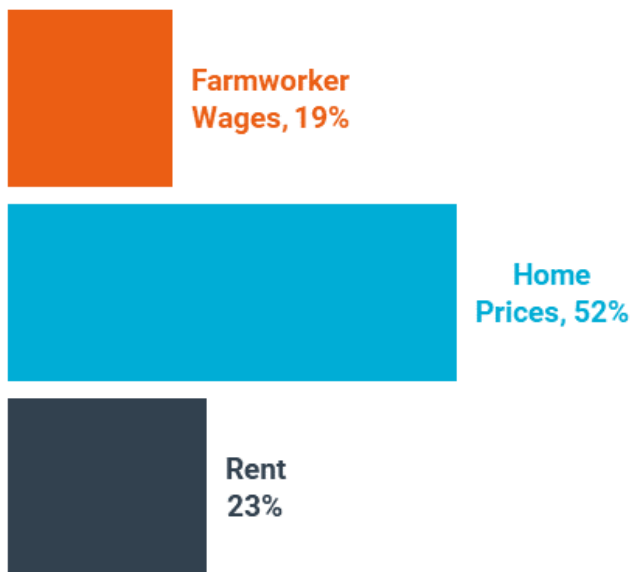
⁸¹ 2018 average wages projected based on average annual growth rates over 5 years, as reported by ESD, 2019.

Sources: Washington State OFM, 2018; BERK, 2020

Given the regional average annual wages for farmworkers, housing is considered affordable at rates of \$753 per month or less. However, housing prices in Benton County have risen much faster than regional farmworker incomes in recent years, 52% for ownership and 23% for rent, while farmworker wages have increased 19%. See

Exhibit 41. This trend has intensified affordability issues for these residents.

Exhibit 41: Benton County, Percent Change for Farmworker Wages versus Housing Prices, 2012-2018



Sources: Washington ESD, 2020; Washington Center for Real Estate Research, 2012 & 2018; BERK, 2021

Rental Housing

Average rents in Benton County (2018):⁸²

- \$835 for 1-bedroom
- \$899 for 2-bedroom
- The rental vacancy rate in Benton County is 2.6%

Home Ownership

The median price of a home in Benton County is \$278,500.⁸³ For a farmworker household earning annual average wages, the estimated mortgage payment on this price of a home results in a severe cost burden, and the family is unlikely to be approved for a loan in the first place. A more affordable average home cost is on farmworker income is \$160,000 or less, assuming the ability to save for a \$32,000 (20%) down payment. Approximately 6% of Benton County housing units are available in this price range. This down payment will be out of reach for many families, and as

⁸² Washington Center for Real Estate Research, "Apartment Market Survey, Fall 2018," (2018), <http://realestate.washington.edu/wp-content/uploads/sites/6/2019/01/2018FallApartmentMarketReport.pdf>

⁸³ Ibid.

down payment size decreases, monthly mortgage payments increase.

Chelan County

Key Takeaways



As many as **8,527** farmworker households search for housing through local, market rate options in Chelan County.



Thirty-nine percent (39%) of this need is for migratory workers, who have more unique and potentially term-limited housing needs. This is complicated by the reality that rental vacancy is very low in Chelan County, and average rental rates are substantially higher than farmworker wages can afford.

In 2018, Chelan County had...



6,764 year-round agricultural jobs.

Farmworker housing resources in the area offer housing units to 3% of estimated workers.



10,652 migratory jobs available during peak months.

Provided housing covers 35% of estimated local workers. The remaining 3,305 compete for rental housing units alongside year-round workers and all other Chelan County renter households.

Permanent Housing (units)

5,368 Estimated Workers
– 146 Provided Units

5,222 Estimated Gap

Seasonal Housing (beds)

5,826 Estimated Workers
– 2,521 Provided Beds

3,305 Estimated Gap



Housing affordability is a challenge for farmworkers. Average annual wages for farmworkers are below the median family income for all household sizes. The average home value results in severe cost burden for farmworker wages. Less than 12% of housing units for sale will be affordable with farmworker wages.



It is likely that many farmworker households are renters. **Rental units are largely unaffordable for farmworkers. An average 1-bedroom unit results in severe cost burden for average farmworker wages, and the rental vacancy rate in Chelan County is very low (1.4%).** Farmworker families, particularly those with 2+ members, are classified as very-low income and likely struggle to secure adequate accommodation at an affordable rate.

Introduction

Chelan County is part of the north-central state reporting area. Much of the county is public land, including the Okanogan-Wenatchee National Forest and the Lake Chelan National Recreation Area. Highways 2 and 97 are the primary transportation routes through the county. There are 835 farms and over 31,000 acres of agricultural lands, most prevalent in the eastern part of the county.⁸⁴

Chelan County is Washington's 11th most productive county for agriculture, measured by the value of production, but is ranked second for year-round agricultural employment. Major crops grown include apples, cherries and pears.⁸⁵ Other major employment sectors are government service, healthcare and social assistance, and accommodation and food services.⁸⁶

The county has a total population of 78,420. Wenatchee is the county seat and population hub, with 44% of the total population.⁸⁷ An additional 42% of the population lives in unincorporated areas of Chelan County.

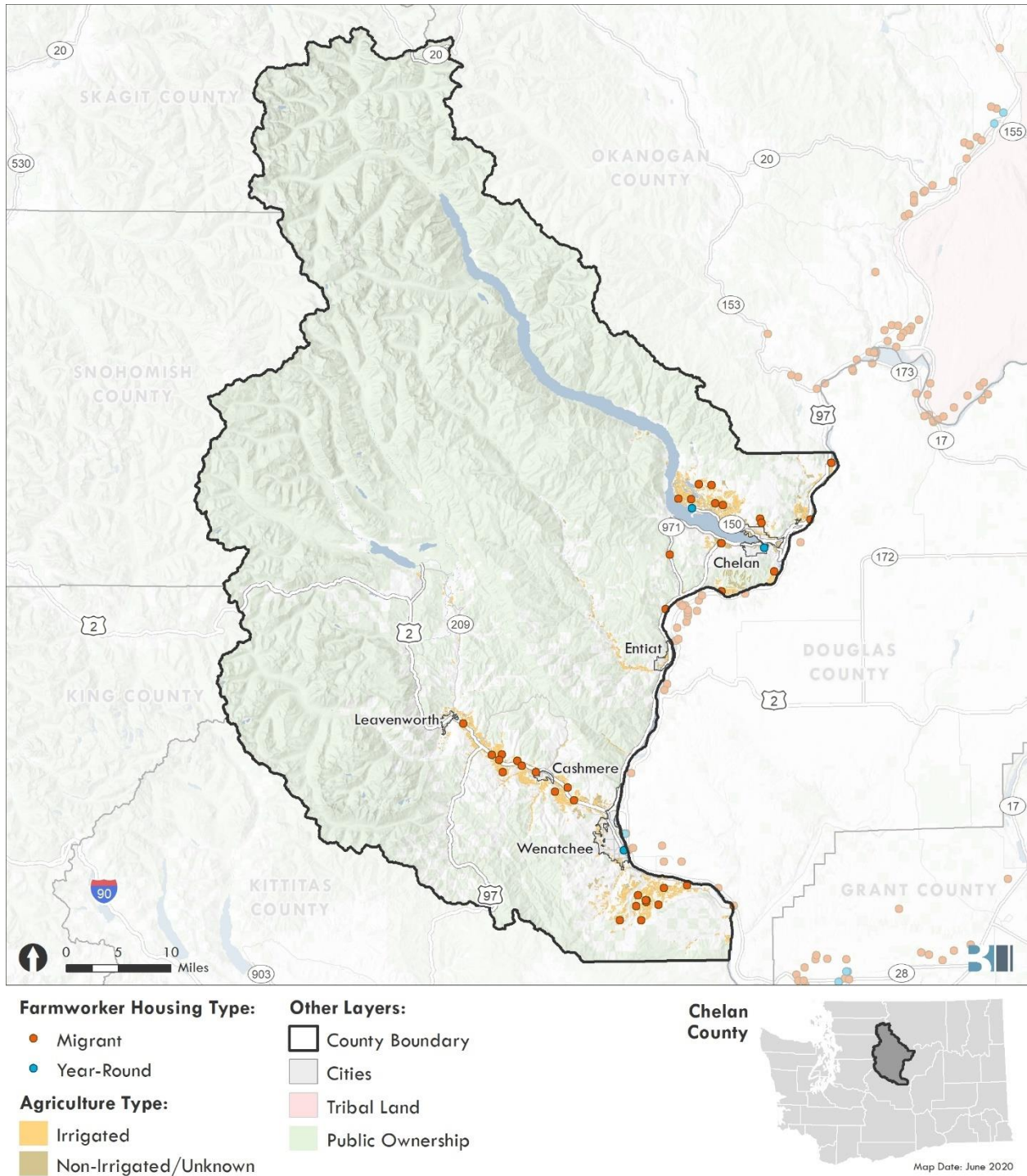
⁸⁴ Washington State Department of Agriculture, "Washington Agriculture Snapshot," (October 2021)

⁸⁵ Washington State Department of Agriculture, 2012.

⁸⁶ Washington State Employment Security Department, Average annual employment by 2-digit NAICS codes, 2018.

⁸⁷ Office of Financial Management, 2019.

Exhibit 42: Chelan County Agricultural Land and Farmworker Housing Units



Sources: Housing Data from Washington DOH, 2019; Washington State Housing Finance Commission, 2019; Office of Rural and Farmworker Housing, 2019; WSDA, 2019

Population Summary

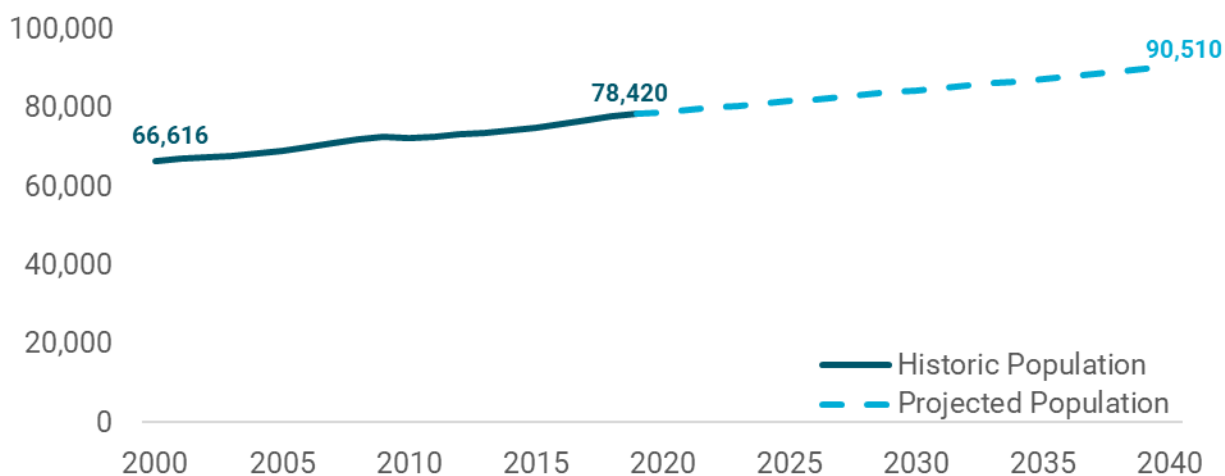
Chelan County has a population of 78,420, which represents an 18% increase since 2000. Medium OFM population projections estimate continued, moderate growth patterns to 2040, as shown in Exhibit 139 and Exhibit 140. Demographic projections estimate a substantial increase in the proportion of adults over 65 as the Baby Boomer generation ages. This is offset by a reduction in the 45-64 cohort. The primary age group for farmworkers, 20-44, is predicted to remain relatively stable as a proportion of the population throughout this period. A higher proportion of the population at or above retirement age may represent higher demand for healthcare services, mobility assistance and ADA-compliant home design features.

Exhibit 43: Chelan County Historical and Projected Growth Rates, 2000-2040

Average Annual Growth	2000-2019	2019-2040 Projected
Individuals	621	576
Percentage	0.9%	0.7%

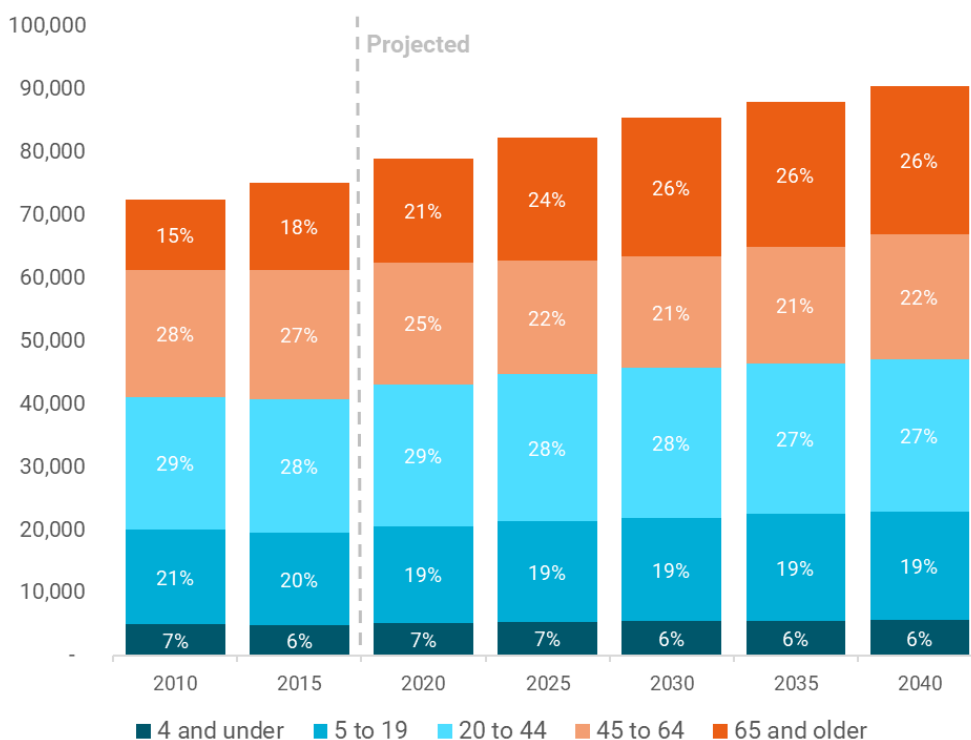
Sources: Washington OFM, 2019; BERK, 2020

Exhibit 44: Chelan County Historical and Projected Population, 2000-2040



Sources: Washington OFM, 2019; GMA 2017 Projections, Medium Series; BERK, 2020

Exhibit 45: Chelan County Population by Age Cohort, Historical and Projected



Sources: Washington OFM, 2018; BERK, 2019

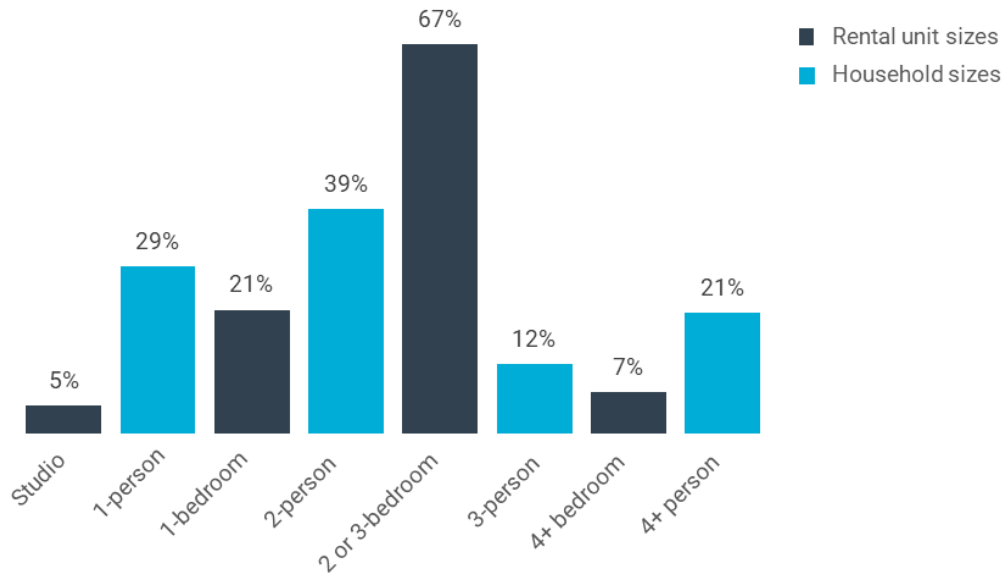
Household Population

The average household size in Chelan County is 3.3 individuals.⁸⁸ Farmworker households are likely to reflect the general overall trend of household sizes in Chelan County. One-third (34%) of Chelan County households, or 9,584 households, are renters. Survey data suggests that this rate is higher among the farmworker population, whose migratory patterns and lower annual earnings (see Exhibit 51) are more compatible with rental housing. This may result in a mismatch of household size and housing stock for agricultural workers who rent and live with children or extended family members, further explored in Exhibit 46. Two- and three-bedroom units represent the majority of rental units available in Chelan County. **However, 21% of the population may need more space to accommodate four or more household members. Larger multifamily units with 4+ bedrooms are limited in the rental market (in Chelan County, only 7% of rental units are this size), increasing the likelihood of overcrowding and “bunking up” arrangements if larger households**

⁸⁸ American Community Survey, Table DP02 5-year Estimates, 2014-2018.

cannot afford to purchase a home.⁸⁹

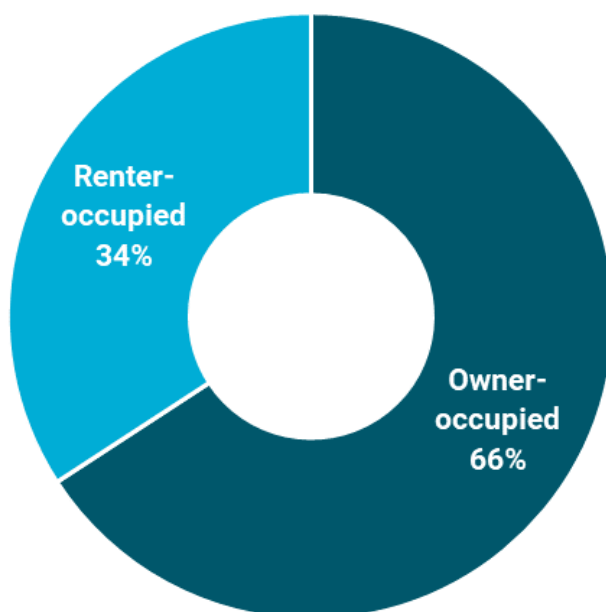
Exhibit 46: Chelan County Household Sizes and Rental Housing Unit Sizes



Sources: American Community Survey S2501 and S2504 5-Yr Estimates, 2014-2018; BERK, 2019

⁸⁹ American Community Survey, Table S2504 5-year Estimates, 2014-2018.

Exhibit 47: Chelan County Housing Tenure by Household, 2018



Sources: American Community Survey Table S2501 5-year Estimates, 2014-2018

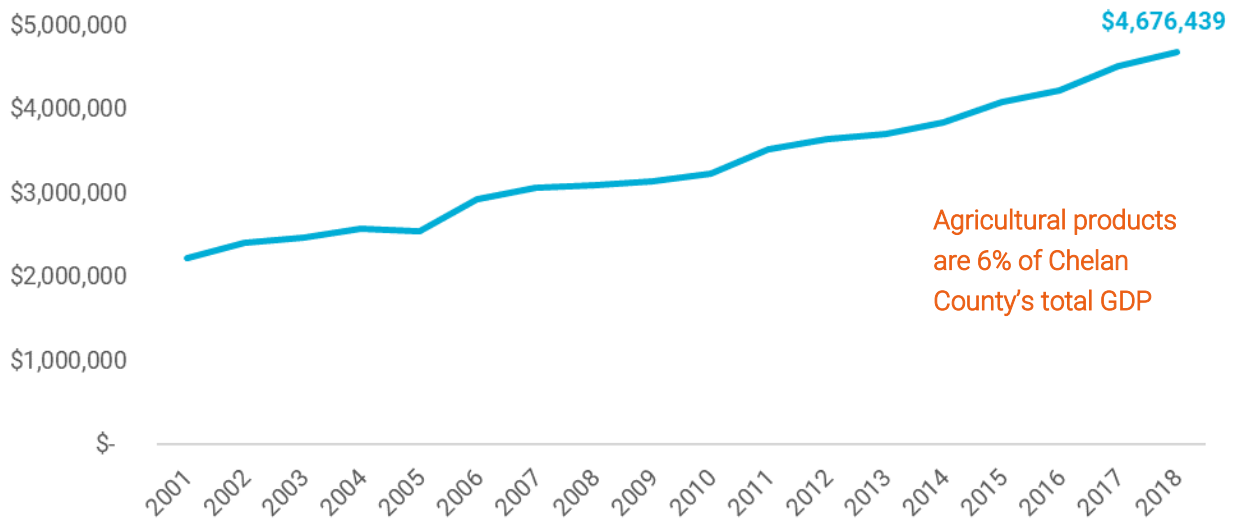
County Economy

In Chelan County, covered farmworkers make up **16% of the labor force**. Agricultural products, however, comprise only 6% of total GDP. This ratio is reversed from many counties where agricultural value will be a higher percentage of total GDP than employment as a percentage of the labor force.

- Chelan County is one of three counties in ESD's north-central area, along with Okanogan and Douglas Counties. This region has the lowest estimate for annual average farmworker wages in Washington.
- Top industries include agriculture, health services, local government and retail.⁹⁰

⁹⁰ Chelan County, "Chelan County Comprehensive Plan," (2017), http://www.co.chelan.wa.us/files/community-development/documents/comps_plan/2017%20Comp%20Plan/Attachment%20A%20-%202017-27%20Comprehensive%20Plan.pdf

Exhibit 48: Chelan County GDP, All Industries

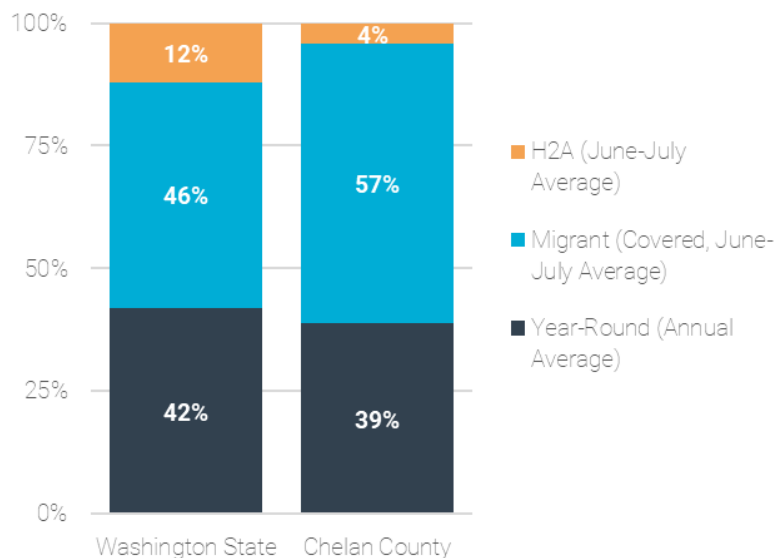


Sources: U.S. Bureau of Economic Analysis (BEA) SAGDP9N series, 2001-2018; BERK, 2020

Farmworker Population

As of 2018, Chelan County has an estimated **6,764 year-round and covered agricultural jobs**, which almost triples during the peak months for migrant employment, in June through October. Compared to statewide averages, Chelan County relies less on H-2A workers and more on migrant, covered employment. These are the workers most likely to struggle to secure adequate accommodations.

Exhibit 49: 2018 Agricultural Employment by Type, County versus State Averages



Sources: Washington ESD, 2019; U.S. Department of Labor, 2020; BERK, 2020

Exhibit 50: Chelan County Farmworker Estimates by Employment Type, 2018

Employment Type	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Year-round	6,658	6,677	6,696	6,716	6,735	6,754	6,773	6,793	6,812	6,831	6,850	6,869
Migrant covered	568	1,198	2,077	1,988	2,171	7,348	12,465	7,478	5,778	3,699	994	556
Migrant H-2A*	474	661	761	1,002	764	784	708	504	98	5	0	0
Total estimated monthly employment	7,700	8,536	9,534	9,706	9,670	14,886	19,946	14,775	12,688	10,535	7,844	7,425

*Statewide requests provided by ESD and discounted 75% to reflect actual versus requested workers; County estimates based on Department of Labor percentages of worker requests by county

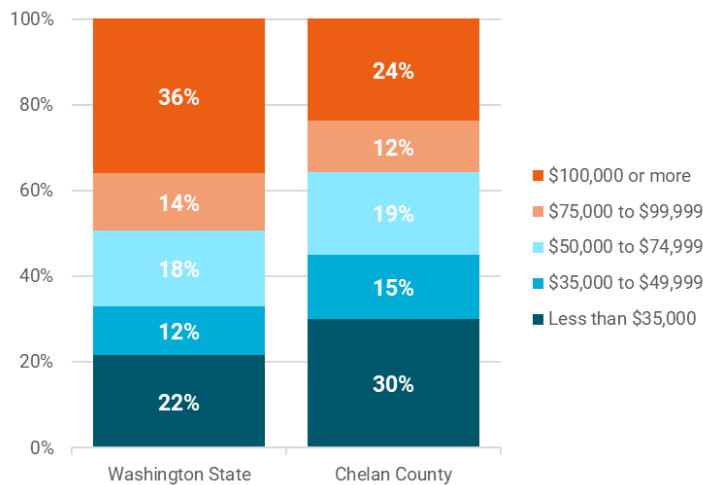
Sources: ESD, Employment Connections Division - Foreign Labor Certification Program; BERK, 2020

Income Summary

Chelan County households have lower incomes than state averages. There is both a higher percentage of households earning less than \$50,000 per year and a lower percentage of households earning greater than \$100,000 per year. Based on ESD income and wages reporting,

farmworker households are likely to earn less than \$35,000 per year without additional income from secondary employment or other household members. This income level is well below the HUD-area median family income for 2018, \$56,135.

Exhibit 51: State and Chelan County Household Income Brackets



Thirty percent of Chelan County households earn less than \$35,000 annually. Many farmworker households are likely to be included in this group, as the 2018 regional average annual salary for agricultural workers was \$26,625.

Sources: American Community Survey S1901 5-Yr Estimates, 2014-2018; BERK, 2020

Estimated wages for farmworkers are below the median family income (MFI) for Chelan County, at any family size. A household earning the regional average for farmworkers earns 40% of MFI in Chelan County, 2+ person households would be classified as very low-income (30-49% MFI), and a single person household would be low-income (50-79% MFI).

- Median family income for Chelan County (2018 - HUD): \$67,100
- Average annual income for north central farmworkers (2018):⁹¹ \$26,625

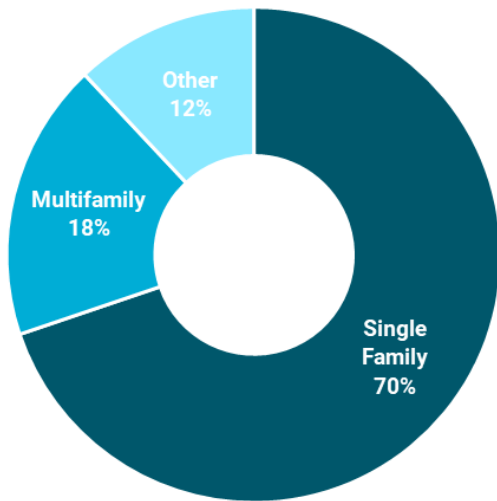
Housing Inventory

There are 38,303 housing units in Chelan County. A notably high percentage (70%) of these are single-family, compared to the statewide average of 64%. Rental rates in Chelan County are remarkably high, particularly when compared to average farmworker wages. Even 1-bedroom units almost double the monthly amount considered affordable to farmworker wages. The low rental vacancy rate (1.4% compared to the statewide rate of 4.3%) indicates high competition for

⁹¹ 2018 average wages projected based on average annual growth rates over 5 years, as reported by ESD, 2019.

available rental units. This may contribute to the high average rental costs.

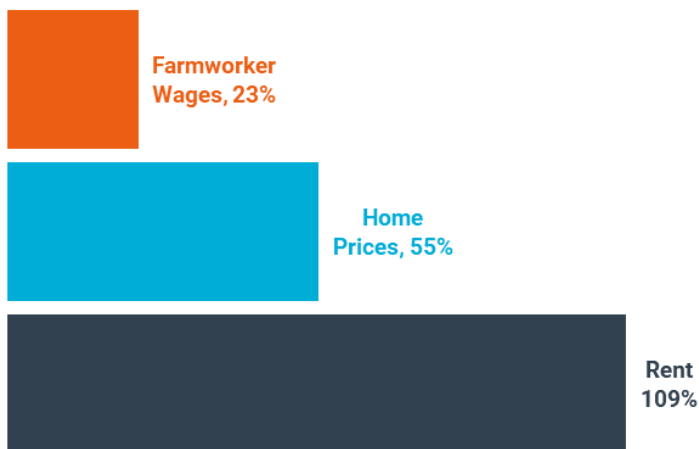
Exhibit 52: Total Housing Units by Type, Chelan County 2018



Sources: Washington OFM, 2018; BERK, 2020

In recent years, housing prices in Chelan County have risen faster than regional farmworker incomes, rising 55% for ownership and 109% for rent, versus 23% for wages. See Exhibit 53. This trend has intensified affordability issues for these residents. **Given the regional average annual wages for farmworkers, housing is considered affordable at rates of \$666 per month or less.**

Exhibit 53: Chelan County, Percent Change for Farmworker Wages versus Housing Prices, 2012-2018



Sources: Washington ESD, 2020; Washington Center for Real Estate Research, 2012 & 2018; BERK, 2021

Rental Housing

Average rents in Chelan County (2018):⁹²

- \$1,143 for 1-bedroom
- \$1,474 for 2-bedroom
- The rental vacancy rate in Chelan County is 1.4%

Home Ownership

The median price of a home in Chelan County is \$343,000.⁹³ For a farmworker household earning annual average wages, the estimated mortgage payment on this price of a home results in a **severe cost burden**. A more affordable home price on a farmworker income is \$80,000 or less, assuming the ability to save for a \$16,000 (20%) down payment. Very few Chelan County housing units are available in this price range. This down payment will be out of reach for many families, and as down payment size decreases, monthly mortgage payments increase.

⁹² Washington Center for Real Estate Research, Apartment Market Survey, Fall 2018.

⁹³ Ibid.

Douglas County

Key Takeaways



As many as **1,272** farmworker households search for housing through local, market rate options in Douglas County.



Five percent (5%) of this need is for migratory workers, who have more unique and potentially term-limited housing needs. This is complicated by the reality that most housing is unaffordable with farmworker wages. It is likely that many of these workers are living in less permanent forms of housing, such as mobile homes, as these comprise 19% of the local housing stock.

In 2018, Douglas County had...



1,548 year-round agricultural jobs.

Farmworker housing resources in the area offer housing units to 2% of estimated workers.



4,394 migratory jobs available during peak months.

Provided housing covers 97% of estimated local workers. The remaining 70 compete in a rental housing market where even 1-bedroom units result in severe cost burden. Very low rental vacancy increases competition for the limited stock of units which might be available.

Permanent Housing (units)

1,228 Estimated Workers
- 26 Provided Units

1,202 Estimated Gap

Seasonal Housing (beds)

2,378 Estimated Workers
- 2,308 Provided Beds

70 Estimated Gap



Housing affordability is a challenge for farmworkers. Average annual wages for farmworkers are significantly below the median family income for all household sizes. The average home value results in severe cost burden for farmworker wages. Less than 7% of homes for sale are within an affordability range for farmworker wages.



It is likely that many farmworker households are renters. **Less than 10% of rental units in the area are sized for families with 4+ people, a common household size in Douglas County.** Farmworker families are likely to struggle securing adequate accommodations at an affordable rate.

Introduction

Douglas County is part of the north-central state reporting area, situated between Chelan County to the west, Okanogan County to the north, and Grant County to the south and east. Highway 2 and State Routes 172 and 17 are the main routes through the county, connecting many of the

incorporated areas. There are 729 farms and more than 550,000 acres of agricultural lands spread throughout the county, with irrigated farmland along the western perimeter.⁹⁴

Douglas County is Washington's 12th most productive county for agriculture, measured by the value of production, and is ranked ninth for year-round agricultural employment. Major crops grown include apples, wheat and pears.⁹⁵ Other major sectors of employment are government services, retail trade, and accommodation and food services.⁹⁶ Retail and food service highlight Douglas County's tourism economy.

The county has a total population of 42,820.⁹⁷ Many residents are rural, as more than half (55%) of Douglas County's population lives in unincorporated areas. East Wenatchee is the largest city, with 32% of the county population and almost three-quarters of incorporated residents. The county seat is Waterville, near the western border with Chelan County.

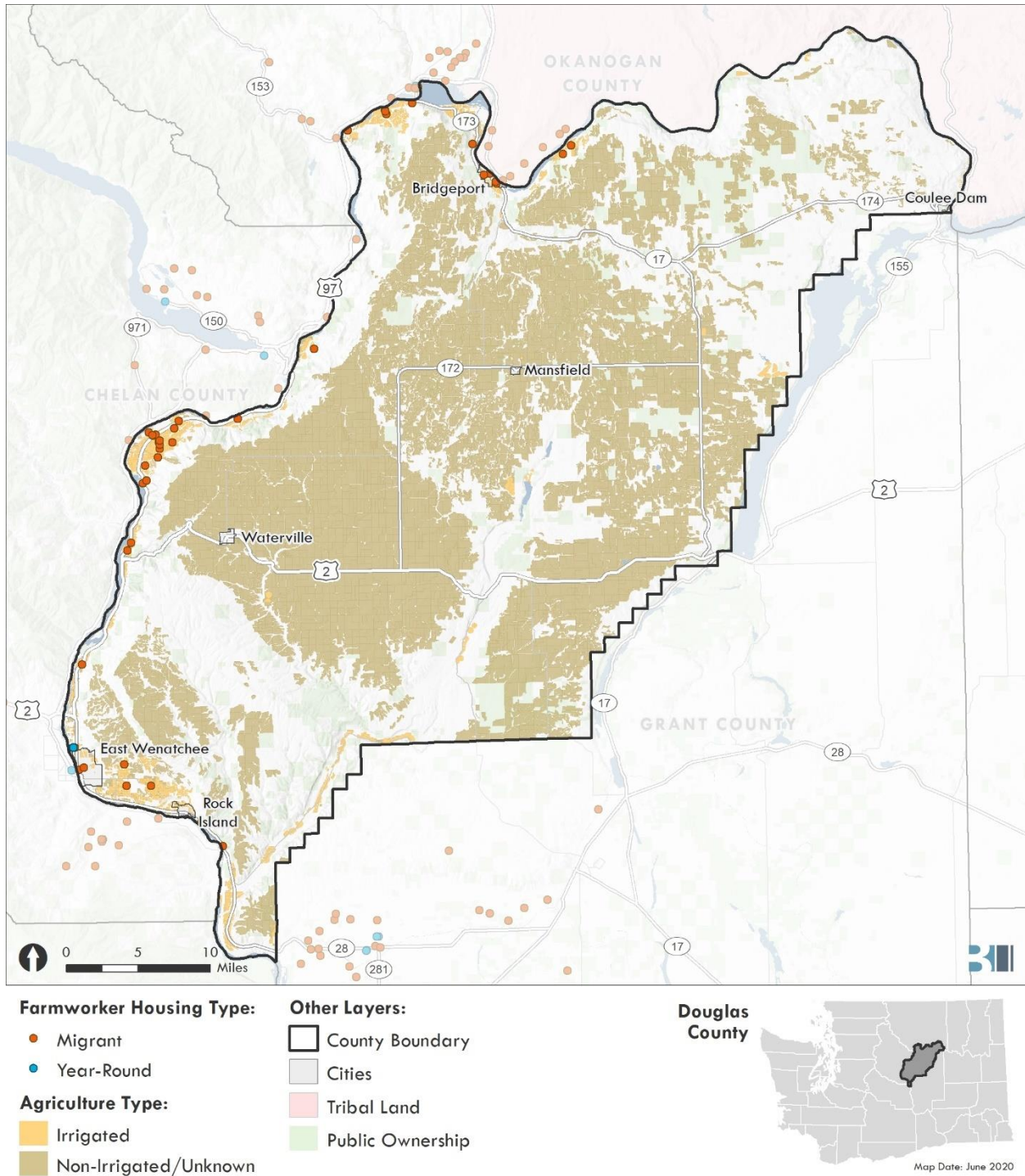
⁹⁴ Washington State Department of Agriculture, "Washington Agriculture Snapshot," (October 2021)

⁹⁵ Washington State Department of Agriculture, 2012.

⁹⁶ Washington State Employment Security Department, Average annual employment by 2-digit NAICS codes, 2018.

⁹⁷ Office of Financial Management, 2019.

Exhibit 54: Douglas County Agricultural Land and Farmworker Housing Units



Sources: Housing data from Washington DOH, 2019; Washington State Housing Finance Commission, 2019; Office of Rural and Farmworker Housing, 2019; WSDA, 2019

Population Summary

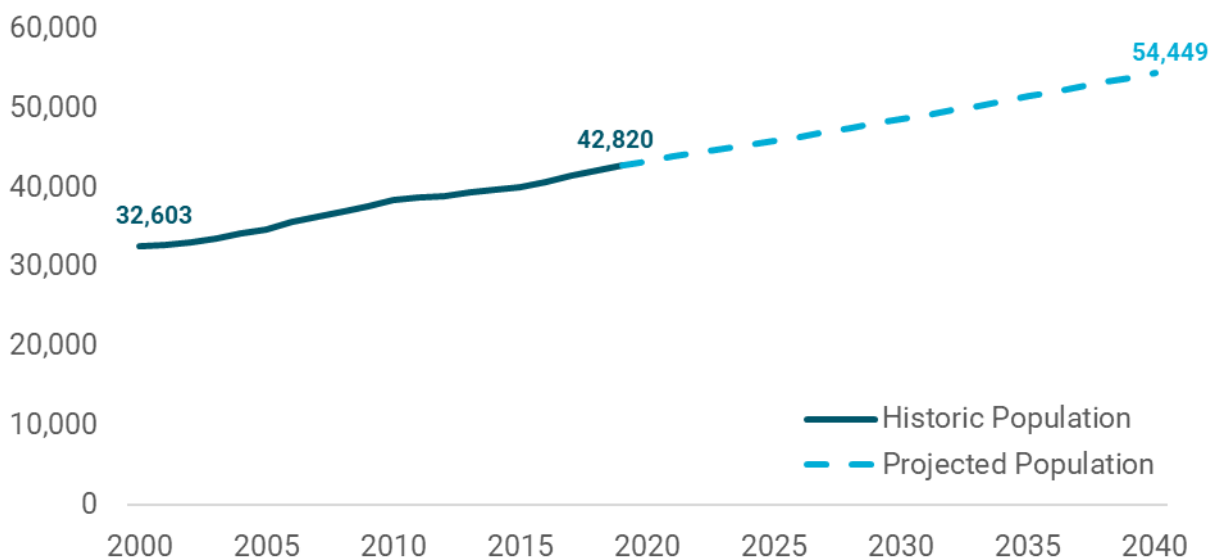
Douglas County has a population of 42,820, which represents a 31% increase since 2000. Medium OFM population projections estimate similar growth patterns through 2040, as shown in Exhibit 139 and Exhibit 140. Demographic projections estimate an increased proportion of residents 65 and older as the Baby Boomer generation ages, while adults aged 45-64 decrease as a proportion of the total population. The primary age group for farmworkers, 20-44, is predicted to remain relatively stable as a proportion of the population throughout this period.

Exhibit 55: Douglas County Historical and Projected Growth Rates, 2000-2040

Average Annual Growth	2000-2019	2019-2040 Projected
Individuals	538	554
Percentage	1.6%	1.3%

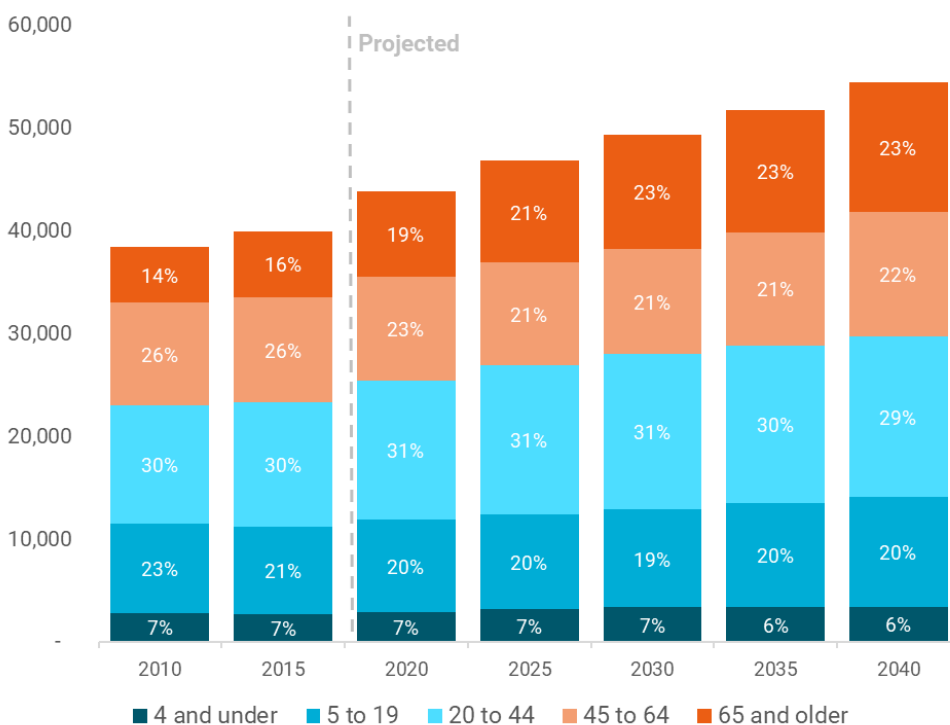
Sources: Washington State Office of Financial Management, 2019; BERK, 2020

Exhibit 56: Douglas County Historical and Projected Population, 2000-2040



Sources: Washington OFM, 2019; Yakima County Horizon 2040 Comprehensive Plan; BERK, 2019

Exhibit 57: Douglas County Population by Age Cohort, Historical and Projected



Sources: Washington OFM, 2018; BERK, 2019

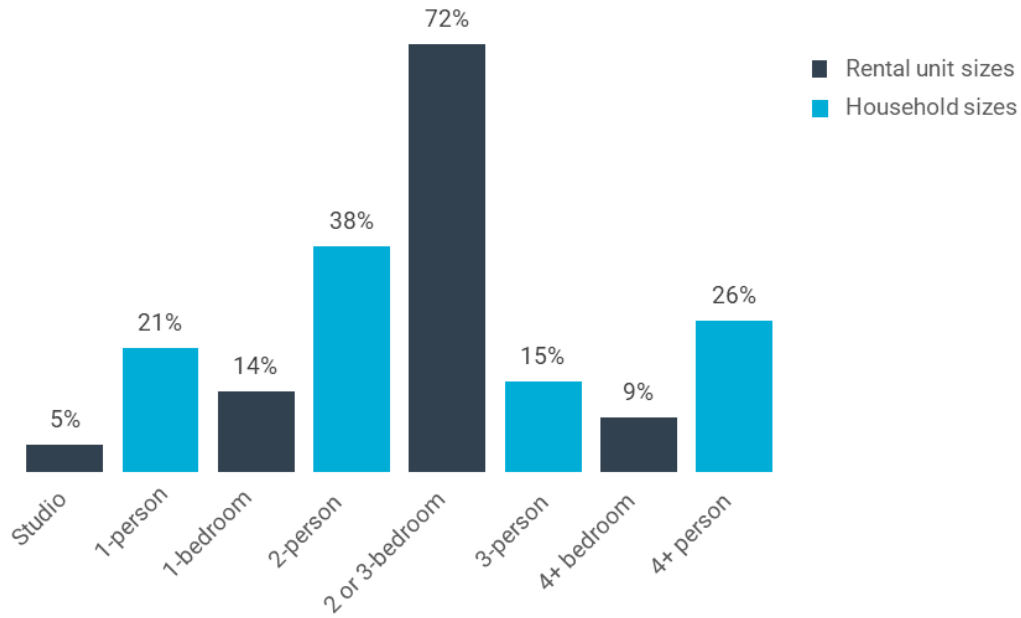
Household Population

The average household size in Douglas County is 2.7 individuals.⁹⁸ Farmworker households are likely to reflect the general overall trend of household sizes. Thirty percent of Douglas County households, or 4,559 households, are renters. Anecdotal data from interviews suggests that this rate may be higher among the farmworker population. This may result in a mismatch of household size and housing stock for agricultural workers who rent and live with children or extended family members. Two- and three-bedroom units represent the majority of rental units available in Douglas County. **However, 26% of the population has larger households. Larger multifamily units with 4+ bedrooms are limited in the rental market (in Douglas County, only 9% of rental units are this size), increasing the likelihood of overcrowding and “bunking up” arrangements if households cannot afford to purchase a home.**⁹⁹

⁹⁸ American Community Survey, Table DP02 5-year Estimates, 2014-2018.

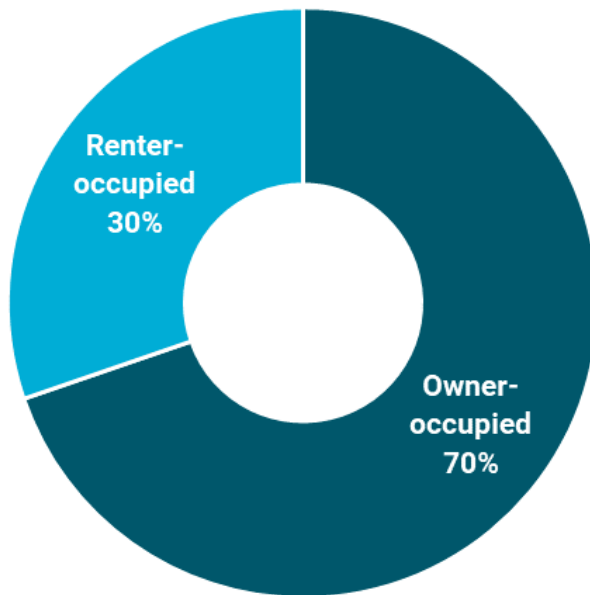
⁹⁹ American Community Survey, Table S2504 5-year Estimates, 2014-2018.

Exhibit 58: Douglas County Household Size and Rental Housing Unit Sizes



Sources: American Community Survey S2501 and S2504 5-Yr Estimates, 2014-2018; BERK, 2020

Exhibit 59: Douglas County Housing Tenure by Household, 2018



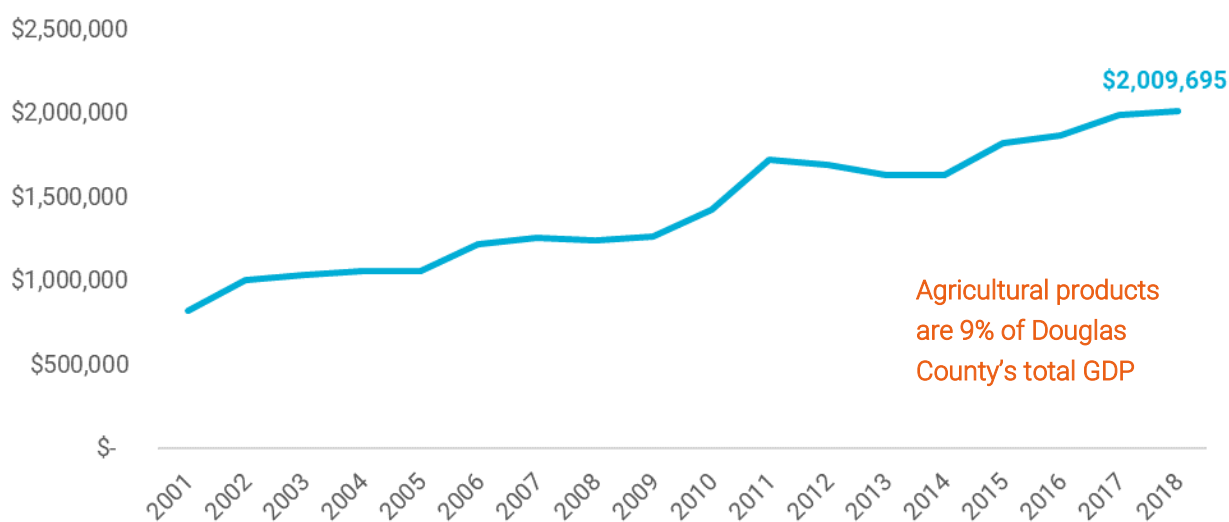
Sources: American Community Survey Table S2501 5-year Estimates, 2014-2018; BERK, 2020

County Economy

Covered agricultural employment makes up **8% of the labor force**, and agricultural products comprise 9% of total GDP.

- Douglas County is one of three counties in ESD's north-central area, along with Chelan and Okanogan counties. Farmworker wages are the lowest of the six Washington reporting areas.
- Top Douglas County employment industries include agriculture, local government, retail trade and health services.¹⁰⁰

Exhibit 60: Douglas County GDP, All Industries



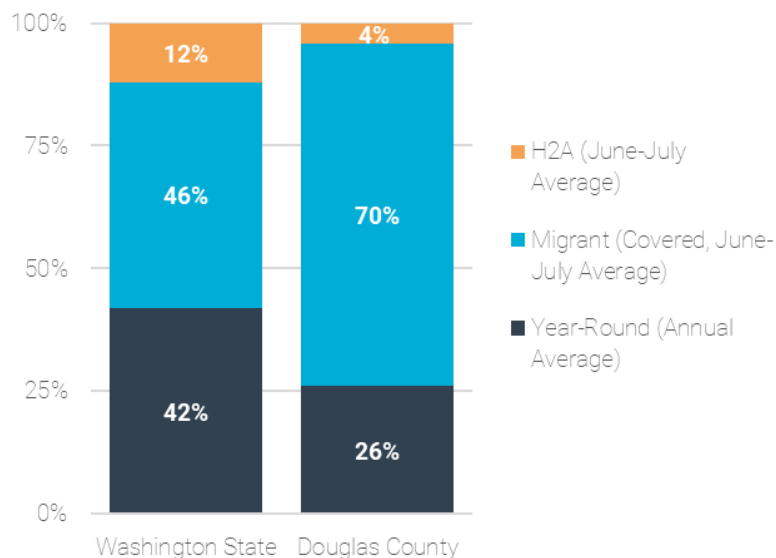
Sources: U.S. Bureau of Economic Analysis (BEA) SAGDP9N series, 2001-2018; BERK, 2020

Farmworker Population

As of 2018, Douglas County is home to an estimated **1,548 year-round and covered agricultural jobs**, which more than triples during the peak months for migrant employment, in June through September. Compared to statewide averages, Douglas County relies less on year-round and H-2A workers and much more upon covered migrant employment. These workers are likely to struggle most when securing adequate housing.

¹⁰⁰ Chelan County, "Chelan County Comprehensive Plan, 2017-2037," (2017), http://www.co.chelan.wa.us/files/community-development/documents/comps_plan/2017%20Comp%20Plan/Attachment%20A%20-%202017-27%20Comprehensive%20Plan.pdf.

Exhibit 61: 2018 Agricultural Employment by Type, County versus State Averages



Sources: Washington ESD, 2019; U.S. Department of Labor, 2020; BERK, 2020

Exhibit 62: Douglas County Farmworker Estimates by Employment Type, 2018

Employment Type	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Year-round	1,525	1,530	1,534	1,539	1,543	1,547	1,550	1,554	1,558	1,561	1,565	1,568
Migrant covered	610	736	1,065	1,680	1,449	3,255	5,022	2,011	2,253	1,539	853	382
Migrant H-2A*	165	169	283	291	291	299	212	189	118	110	110	110
Total estimated monthly employment	2,300	2,435	2,882	3,510	3,283	5,101	6,784	3,754	3,929	3,210	2,528	2,060

*Statewide requests provided by ESD and discounted 75% to reflect actual versus requested workers; County estimates based on Department of Labor percentages of worker requests by county

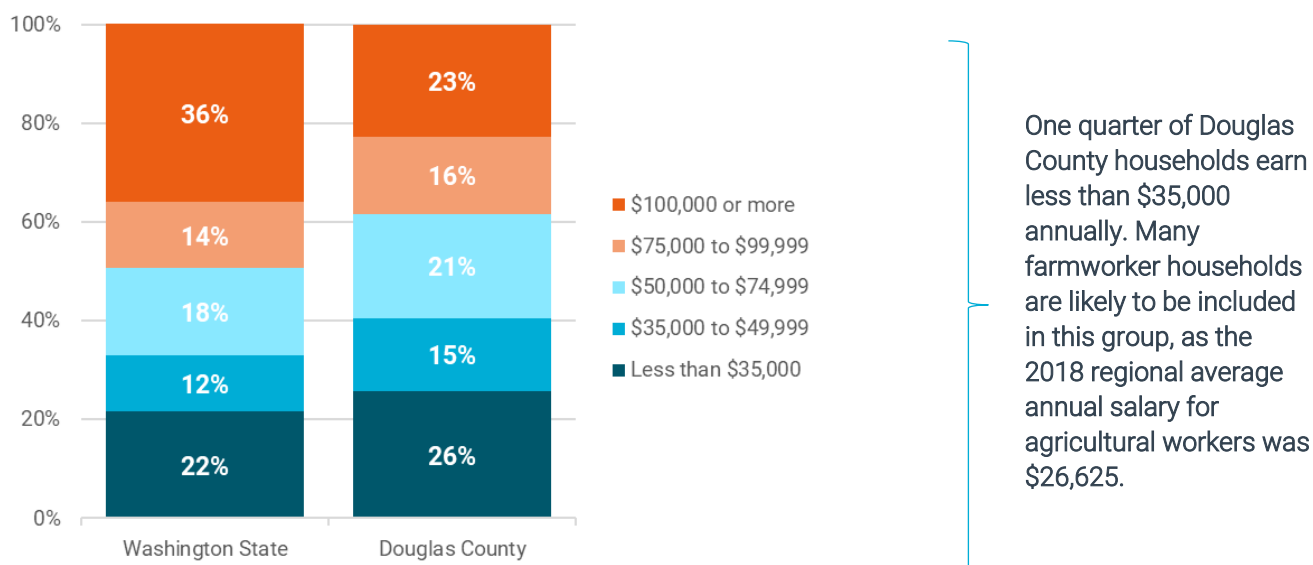
Sources: ESD, Employment Connections Division - Foreign Labor Certification Program; BERK, 2020

Income Summary

Douglas County households have lower incomes than state averages. There is both a higher percentage of households earning less than \$50,000 per year and a lower percentage of households earning greater than \$100,000 per year. Based on ESD income and wages reporting, farmworker households are likely to earn less than \$35,000 per year without additional income

from secondary employment or other household members. This income level is well below the HUD-area median family income for 2018, \$67,100.

Exhibit 63: State and Douglas County Household Income Brackets



Sources: American Community Survey S1901 5-Yr Estimates, 2010 & 2018; BERK, 2020

Estimated wages for farmworkers are below the median family income (MFI) for Douglas County at any family size. A household earning the regional average for farmworkers earns 40% of MFI in Douglas County, classified as very low-income for households with three or more members (30-49% MFI) or low-income for single or two-person households (50-79% MFI).

- Median family income for Douglas County (2018 - HUD): \$67,100
- Average annual income for north central farmworkers (2018):¹⁰¹ \$26,625

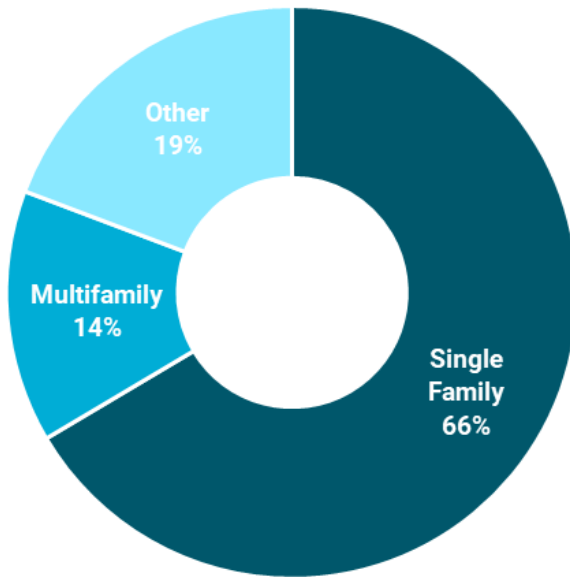
Housing Inventory

There are 17,211 housing units in Douglas County. A high percentage (19% compared to 8% statewide) of these are classified as ‘other,’ including mobile homes and other special housing types. This high percentage may correlate to the high number of farmworkers living in temporary housing types. Average rental rates lead to a severe cost burden for farmworker wages in

¹⁰¹ 2018 average wages projected based on average annual growth rates over 5 years, as reported by ESD, 2019.

Douglas County, as does the estimated mortgage for an average home.

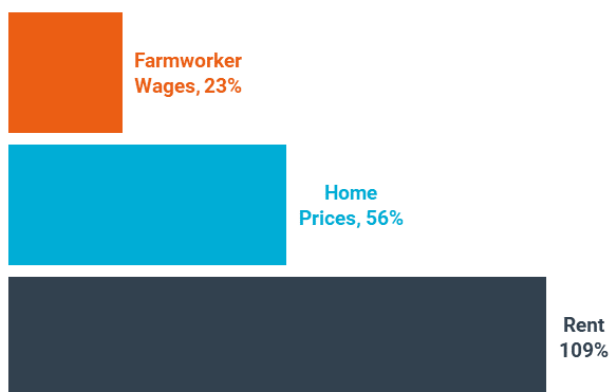
Exhibit 64: Total Housing Units by Type, Douglas County 2018



Sources: Washington State OFM, 2018; BERK, 2020

Housing prices in Douglas County have risen much faster than regional farmworker incomes in recent years, 56% for ownership and 109% for rent versus 23% for farmworker wages. See Exhibit 65. This trend has intensified affordability issues for these residents. **Given the regional average annual wages for farmworkers, housing is considered affordable at rates of \$666 per month or less.**

Exhibit 65: Douglas County, Percent Change for Farmworker Wages versus Housing Prices, 2012-2018



Sources: Washington ESD, 2020; Washington Center for Real Estate Research, 2012 & 2018; BERK, 2021

Rental Housing

Average rents in Douglas County (2018):¹⁰²

- \$1,143 for 1-bedroom
- \$1,474 for 2-bedroom
- The rental vacancy rate in Douglas County is 1.4%

Home Ownership

The median price of a home in Douglas County is \$316,700.¹⁰³ For a farmworker household earning annual average wages, the estimated mortgage payment on this price of a home results in a **severe cost burden**. A more affordable home price is \$80,000 or less, assuming the ability to save for a \$16,000 (20%) down payment. Approximately 2% of Douglas County housing units are available in this price range. This down payment will be out of reach for many families, and as down payment size decreases, monthly mortgage payments increase.

¹⁰² Washington Center for Real Estate Research, Apartment Market Survey, Fall 2018.

¹⁰³ Ibid.

Franklin County

Key Takeaways



As many as **5,140** farmworker households search for housing through local, market rate options in Franklin County.



Fifty-seven percent (57%) of this need is for migratory workers, who have more unique and potentially term-limited housing needs. This is complicated by the reality that there is a limited stock of multifamily housing in Franklin County, and much of the rental housing is not affordable with farmworker wages.

In 2018, Franklin County had...



2,960 year-round agricultural jobs.

Farmworker housing resources in the area offer housing units to 6% of estimated workers.

Permanent Housing (units)

2,349 Estimated Workers
– 145 Provided Units

2,404 Estimated Gap



8,709 migratory jobs available during peak months.

Provided housing covers 14% of estimated local workers. The remaining 2,936 compete in the rental market, where low vacancy and high rental rates limit available options for migratory workers.

Seasonal Housing (beds)

5,442 Estimated Workers
– 2,506 Provided Beds

2,936 Estimated Gap



Housing affordability is a challenge for farmworkers. Average annual wages for farmworkers are below the median family income for all household sizes. The average home value results in severe cost burden for farmworker wages.



It is likely that many farmworker households are renters. An average 1-bedroom apartment results in cost burden with farmworker wages. Farmworkers with children will struggle further, as **there are very few rental units in the area that can accommodate families with 4+ people, a common household size in Franklin County.**

Introduction

Franklin County is part of the southeastern reporting area, situated with Adams County to the north, Benton County to the west and Walla Walla County to the east. The Snake and Columbia rivers form most of Franklin County's southern, eastern and western borders. Highway 395 and State Route 260 are the primary transportation routes through the county, connecting many of the incorporated areas. There are 772 farms and more than 473,000 acres of agricultural lands distributed throughout the county, with irrigated farmland to the west and non-irrigated land to the east.¹⁰⁴

Franklin County is Washington's 12th most productive county for agriculture, measured by the value of production, and ranked ninth for year-round agricultural employment. Major crops include potatoes, apples and hay.¹⁰⁵ Other major sectors of employment are government services, manufacturing and retail trade.¹⁰⁶

The county has a population of 94,680. Pasco is the county seat and major population hub, housing 80% of Franklin County residents.¹⁰⁷

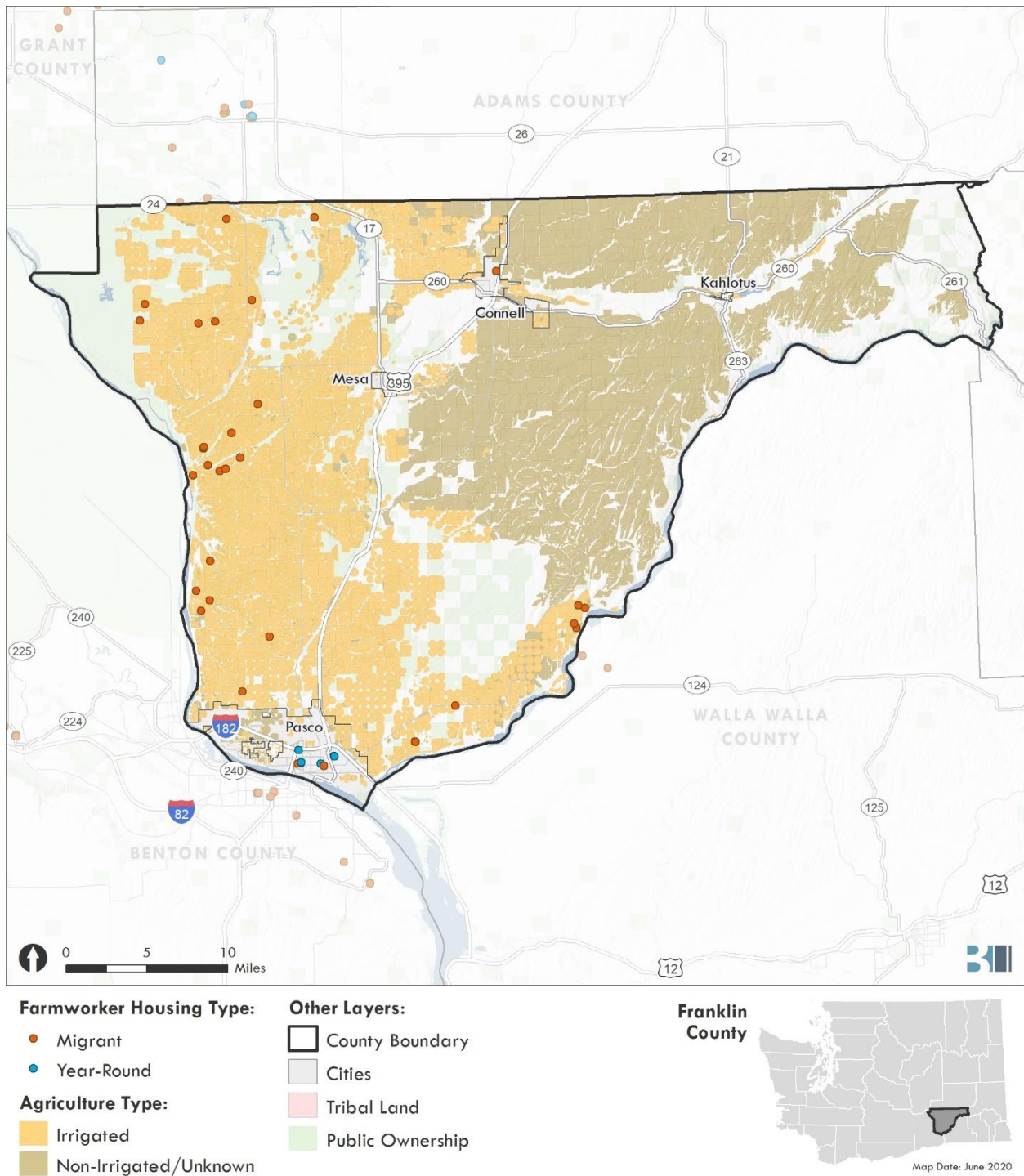
¹⁰⁴ Washington State Department of Agriculture, "Washington Agriculture Snapshot," (October 2021).

¹⁰⁵ Washington State Department of Agriculture, 2012.

¹⁰⁶ Washington State Employment Security Department, Average annual employment by 2-digit NAICS codes, 2018.

¹⁰⁷ Office of Financial Management, 2019.

Exhibit 66: Franklin County Agricultural Land and Farmworker Housing Units, 2019



Sources: Housing Data from Washington DOH, 2019; Washington State Housing Finance Commission, 2019; Office of Rural and Farmworker Housing, 2019; WSDA, 2019

Population Summary

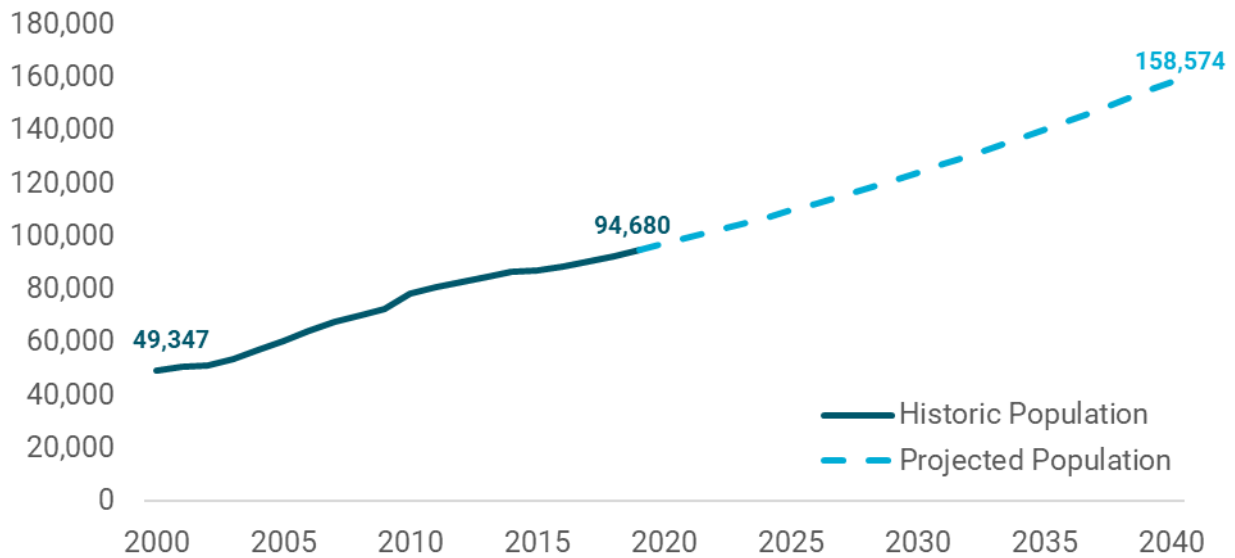
Franklin County’s population increased 31% from 2000 to 2019. Medium OFM population projections estimate continued, although slightly decelerated, growth patterns to 2040, as shown in Exhibit 139 and Exhibit 140. Demographic projections for Franklin County estimate an increasing proportion of adults over 65 as the Boomer generation ages. This is coupled with decreasing proportions of people aged 20-44, the primary age group for farmworkers, which is expected to decrease from 36% to 33% of the population by 2040.

Exhibit 67: Franklin County Historical and Projected Growth Rates, 2000-2040

Average Annual Growth	2000-2019	2019-2040 Projected
Individuals	2,386	3,043
Percentage	4.8%	3.2%

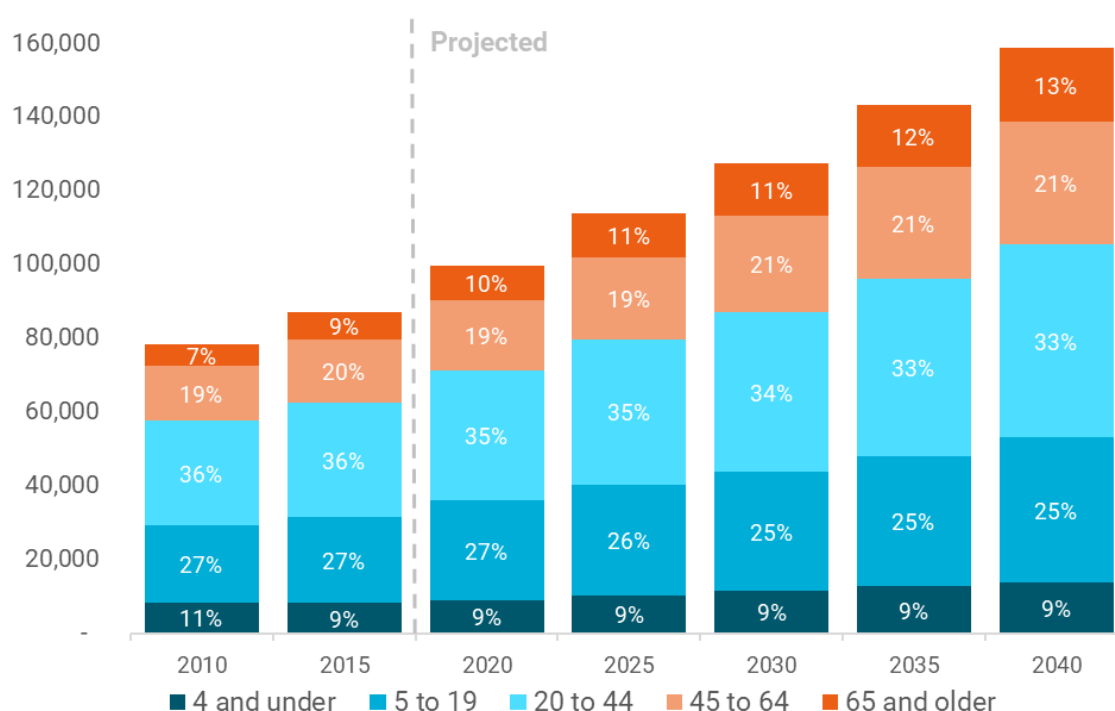
Sources: Washington OFM, 2019; BERK, 2020

Exhibit 68: Franklin County Historical and Projected Population, 2000-2040



Sources: Washington OFM, 2019; Yakima County Horizon 2040 Comprehensive Plan; BERK, 2019

Exhibit 69: Franklin County Population by Age Cohort, Historical and Projected



Sources: Washington OFM, 2018; BERK, 2019

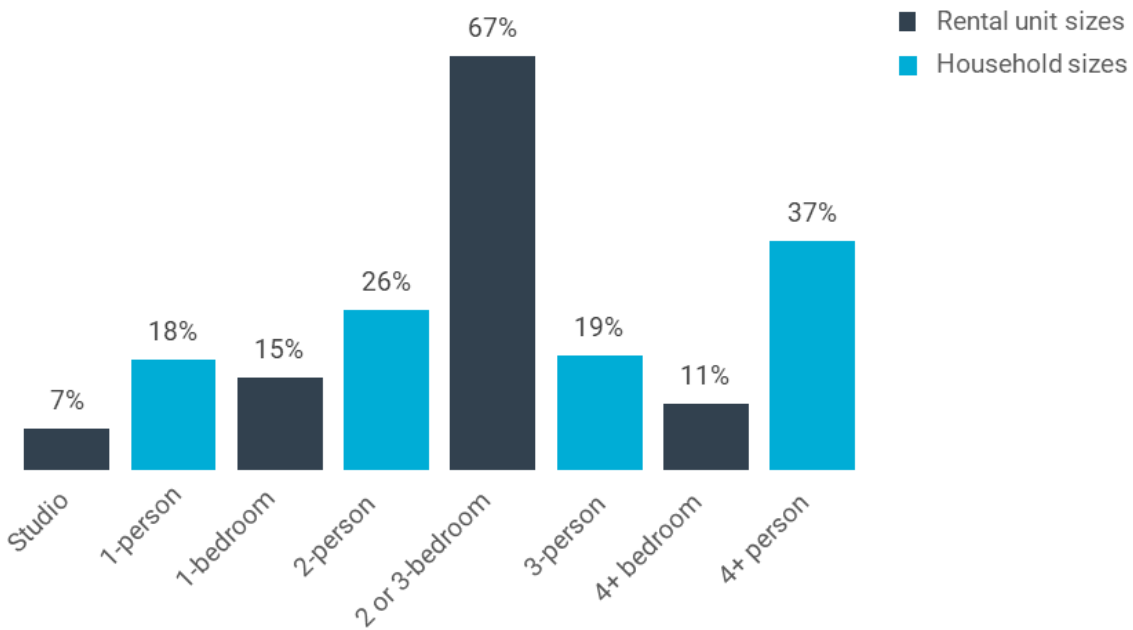
Household Population

The average household size in Franklin County is 3.4 people.¹⁰⁸ Farmworker households are likely to reflect the general overall trend of household sizes. Thirty-one percent, or 8,244 households, are renters. Survey data suggests this rate is higher among the farmworker population, whose migratory patterns and lower annual earnings (see Exhibit 75) are more compatible with rental housing. Two- and three-bedroom units represent the majority of rental units available in Franklin County. This may also result in a mismatch of household size and housing stock for agricultural workers who rent and live with children or extended family members, further explored in Exhibit 70. However, 37% have four or more household members, potentially requiring larger multifamily units. Units with 4+ bedrooms are limited in the rental market (in Franklin County, only 11% of rental units are this size), increasing the likelihood of overcrowding and “bunking up”

¹⁰⁸ American Community Survey, Table DP02 5-year Estimates, 2014-2018.

arrangements if households cannot afford to purchase a home.¹⁰⁹

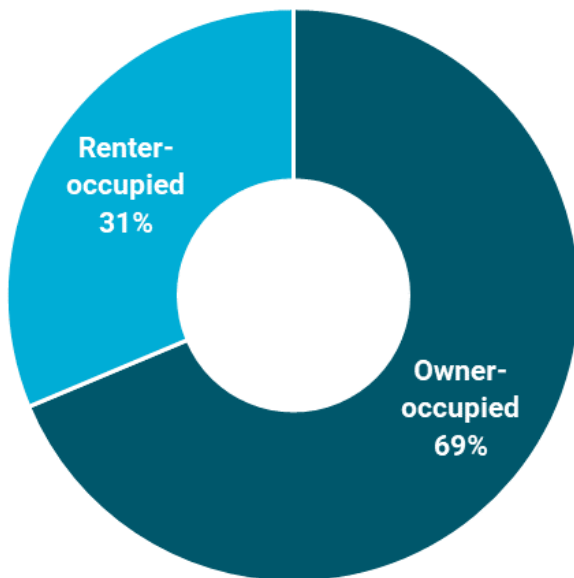
Exhibit 70: Franklin County Household Size



Sources: American Community Survey S2501 and S2504 5-Yr Estimates, 2014-2018; BERK, 2019

¹⁰⁹ American Community Survey, Table S2504 5-year Estimates, 2014-2018.

Exhibit 71: Franklin County Housing Tenure by Household, 2018



Sources: American Community Survey Table S2501 5-year Estimates, 2014-2018; BERK, 2020

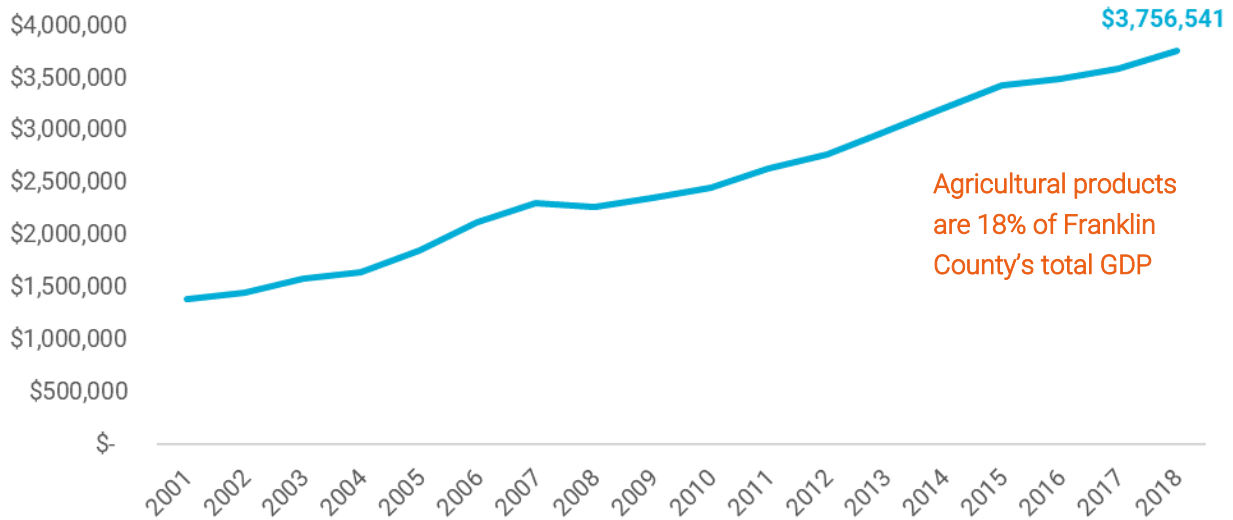
County economy

In Franklin County, covered agricultural employment makes up **8% of the labor force**. Agricultural products comprise 18% of total GDP.

- Franklin County is one of three counties in ESD's southeastern area, along with Benton and Walla Walla counties. Farmworkers' earnings are slightly higher than the statewide average.
- Top employers for Franklin County include Tyson Foods, Lourdes Health Network, Tri-Cities Airport and the Port of Pasco.¹¹⁰

¹¹⁰ Benton-Franklin Council of Governments, "Major Employers in Benton, Franklin and Walla Walla Counties," (2010), <http://bfcog.us/2010%20Major%20Employers.pdf>

Exhibit 72: Franklin County GDP, All Industries

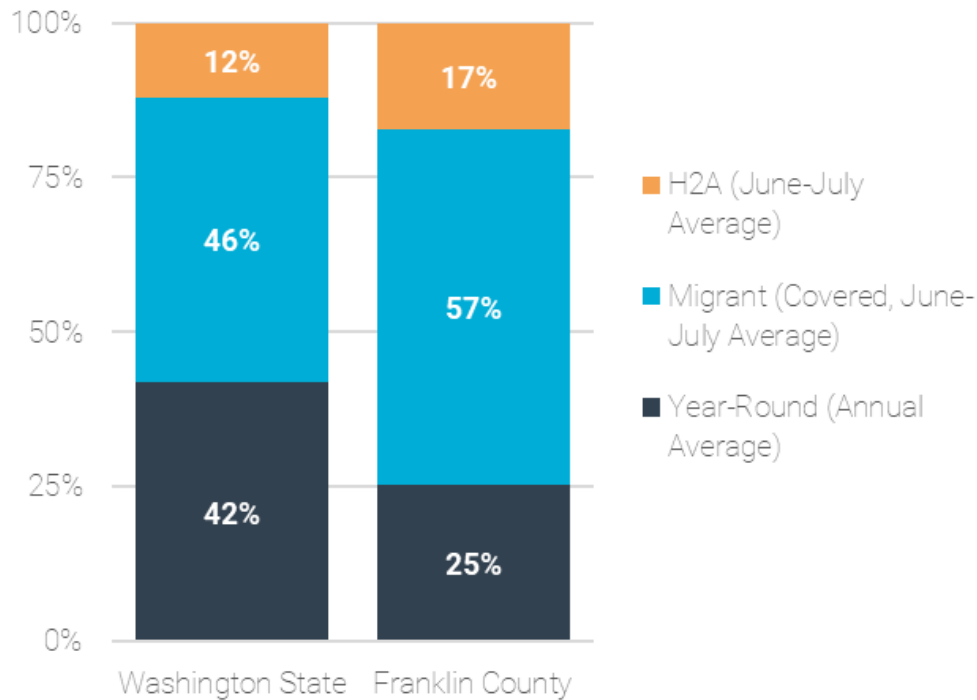


Sources: U.S. Bureau of Economic Analysis (BEA) SAGDP9N series, 2001-2018; BERK, 2020

Farmworker Population

As of 2018, Franklin County is home to an estimated **2,960 year-round and covered agricultural jobs**. This more than triples during the peak months for migrant employment in June through August. Compared to statewide averages, Franklin County relies more upon migrant employment, both covered and H-2A, and less on year-round workers.

Exhibit 73: 2018 Agricultural Employment by Type, County versus State Averages



Sources: Washington ESD, 2019; U.S. Department of Labor, 2020; BERK, 2020

Exhibit 74: Franklin County Farmworker Estimates by Employment Types, 2018

Employment Type	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Year-round	2,956	2,958	2,960	2,961	2,962	2,962	2,961	2,961	2,960	2,960	2,959	2,958
Migrant covered	1,717	2,353	2,916	4,433	5,174	7,747	5,634	5,421	4,004	3,610	2,181	1,454
Migrant H-2A*	178	279	330	437	451	2,087	1,936	1,709	1,634	0	0	0
Total estimated monthly employment	4,851	5,590	6,206	7,831	8,587	12,796	10,531	10,091	8,598	6,570	5,140	4,412

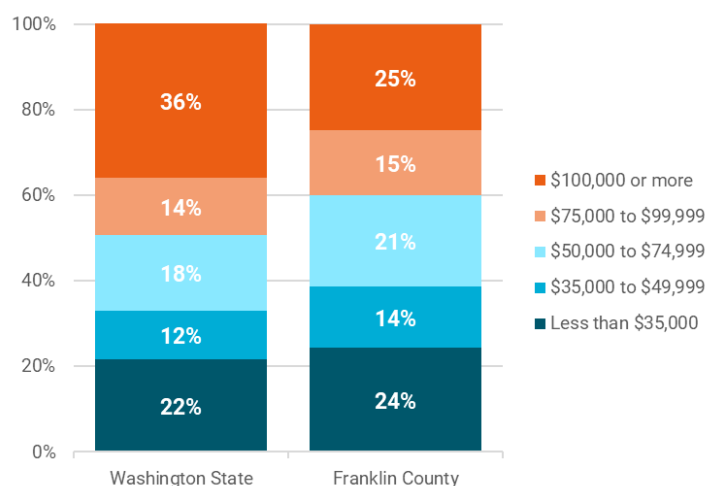
*Statewide requests provided by ESD and discounted 75% to reflect actual versus requested workers; County estimates based on Department of Labor percentages of worker requests by county

Sources: Employment Security Department, Employment Connections Division - Foreign Labor Certification Program; BERK, 2020

Income Summary

Franklin County households have lower incomes than state averages. There is a slightly higher percentage of households earning less than \$50,000 per year (38% versus 34%) and a much lower percentage of households earning greater than \$100,000 per year (25% versus 36%). Based on ESD income and wages reporting, farmworker households are likely to earn less than \$35,000 per year without additional income contributed from secondary employment or other household members. This income level is also well below the HUD-area median family income for 2018, \$72,800.

Exhibit 75: Franklin County and State Household Income Brackets



One quarter of Franklin County households earn less than \$35,000 annually. Many farmworker households are likely to be included in this group, as the 2018 regional average annual salary for agricultural workers was \$30,133.

Sources: American Community Survey S1901 5-Yr Estimates, 2010 & 2018; BERK, 2020

Estimated wages for farmworkers are below the median family income (MFI) for Franklin County at any family size. **A single household earning the regional average for farmworkers earns 41% of MFI in Franklin County, classified as very low-income (30-49% MFI) for families of three or more members and low-income (50-79% MFI) for singles and two-person households.**

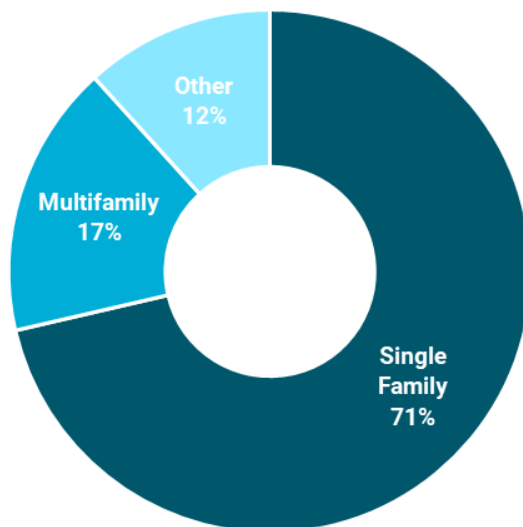
- Median family income for Franklin County (2018 - HUD): \$72,800
- Average annual income for southeastern farmworkers (2018):¹¹¹ \$30,133

¹¹¹ 2018 average wages projected based on average annual growth rates over 5 years, as reported by ESD, 2019.

Housing Inventory

There are 28,476 housing units in Franklin County. The housing stock has higher proportions of single-family and mobile homes/other housing units, resulting in a limited stock of multifamily units (17% compared to 28% statewide). The market for rental units is competitive (vacancy rate 2.6%) and largely unaffordable on farmworker wages. An average 1-bedroom apartment results in a cost burden for average farmworker wages, and the estimated mortgage for the average home results in a severe cost burden. Only 6% of homes for sale would be considered affordable with farmworker wages.

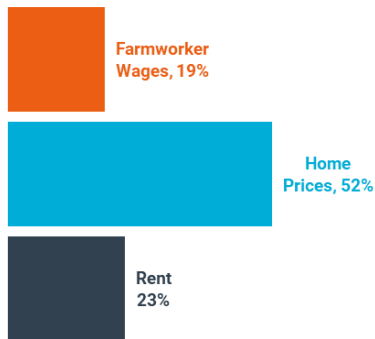
Exhibit 76: Total Housing Units by Type, Franklin County 2018



Sources: Washington OFM, 2018; BERK, 2020

Housing prices in Franklin County have risen faster than regional farmworker incomes in recent years, 52% for ownership and 23% for rent, versus 19% for wages. See Exhibit 77. This trend has exacerbated affordability issues, particularly for those planning to purchase a home. **Given the regional average annual wages for farmworkers, housing is considered affordable at rates of \$753 per month or less.**

Exhibit 77: Franklin County, Percent Change for Farmworker Wages versus Housing Prices, 2012-2018



Sources: Washington ESD, 2020; Washington Center for Real Estate Research, 2012 & 2018; BERK, 2021

Rental Housing

Average rents in Franklin County (2018):¹¹²

- \$835 for 1-bedroom
- \$899 for 2-bedroom
- The rental vacancy rate in Franklin County is 2.6%

Home Ownership

The median price of a home in Franklin County is \$278,500.¹¹³ For a farmworker household earning annual average wages, the estimated mortgage payment on this price of a home results in a **cost burden**. A more affordable median home price is on farmworker income is \$160,000 or less, assuming the ability to save for a \$32,000 (20%) down payment. Approximately 6% of Franklin County housing units are available in this price range. This down payment will be out of reach for many families, and as down payment size decreases, monthly mortgage payments increase.

¹¹² Washington Center for Real Estate Research, Apartment Market Survey, Fall 2018.

¹¹³ Ibid.

Grant County

Key Takeaways



As many as **4,327** farmworker households search for housing through local, market rate options in Grant County.



Ten percent (10%) of this need is for migratory workers, who have more unique and potentially term-limited housing needs. It is likely that many of these workers are living in less permanent forms of housing, such as mobile homes, as these comprise almost 30% of the local housing stock.

In 2018, Grant County had...



5,483 year-round agricultural jobs.

Farmworker housing resources in the area offered housing units to 8% of this total.



11,533 migratory jobs available during peak months.

Provided housing covers 89% of estimated local workers. The remaining 437 compete for rental units along with year-round farmworker households and all other renter households in Grant County.

Permanent Housing (units)

4,351 Estimated Workers
- 462 Provided Units

3,889 Estimated Gap

Seasonal Housing (beds)

7,713 Estimated Workers
- 7,276 Provided Beds

437 Estimated Gap



Housing affordability is a challenge for farmworkers. Average annual wages for farmworkers are below the median family income for all household sizes. The average home value results in cost burden for farmworker wages.



It is likely that many farmworker households are renters. **There are very few rental units in the area that can accommodate families with 4+ people, a common household size in Grant County.** Farmworker families may struggle to secure adequate accommodation at an affordable rate

Introduction

Grant County is part of the Columbia Basin reporting area, situated in the middle of the state between Kittitas and Adams counties to the west and east, respectively, and Douglas and Benton counties to the north and south. There are 1,384 farms and more than 798,000 acres of

agricultural lands throughout the county, with irrigated farmland most common in the south.¹¹⁴

Grant County is Washington's second most productive county for agriculture, measured by the value of production, and is ranked third for year-round agricultural employment. Major agricultural commodities include apples, cattle and potatoes.¹¹⁵ Other major sectors of employment are government services, manufacturing and retail trade.¹¹⁶

The county has a population of 98,740, with 15 cities and a large population living in unincorporated areas (44%).¹¹⁷ Grant County's largest city is Moses Lake, with 25% of the population, and Ephrata is the county seat.

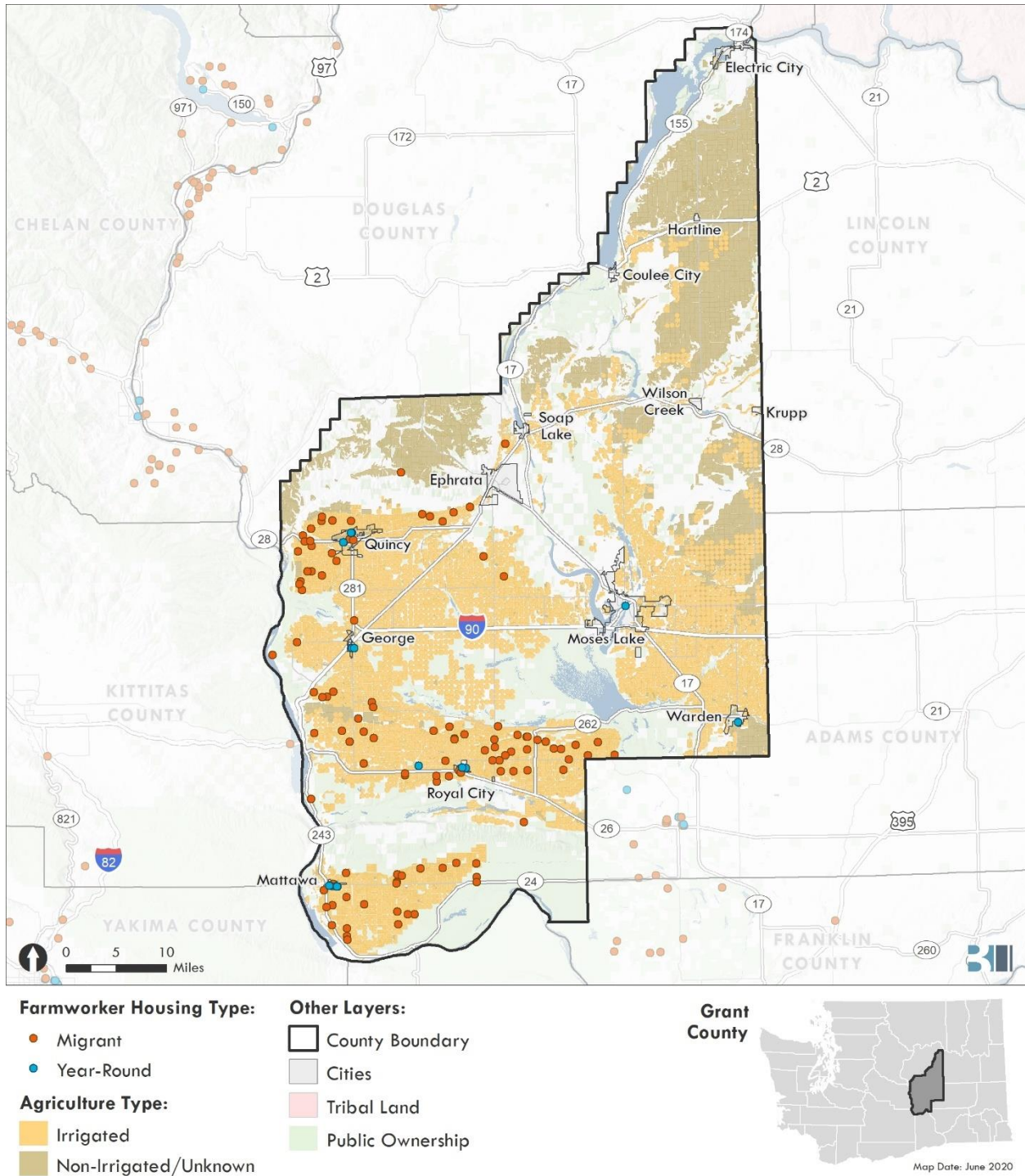
¹¹⁴ Washington State Department of Agriculture, "Washington Agriculture Snapshot," (October 2021).

¹¹⁵ Washington State Department of Agriculture, 2012.

¹¹⁶ Washington State Employment Security Department, Average annual employment by 2-digit NAICS codes, 2018.

¹¹⁷ Office of Financial Management, 2019.

Exhibit 78: Grant County Agricultural Land and Farmworker Housing Units, 2019



Sources: Housing Data from Washington DOH, 2019; Washington State Housing Finance Commission, 2019; Office of Rural and Farmworker Housing, 2019; WSDA, 2019

Population Summary

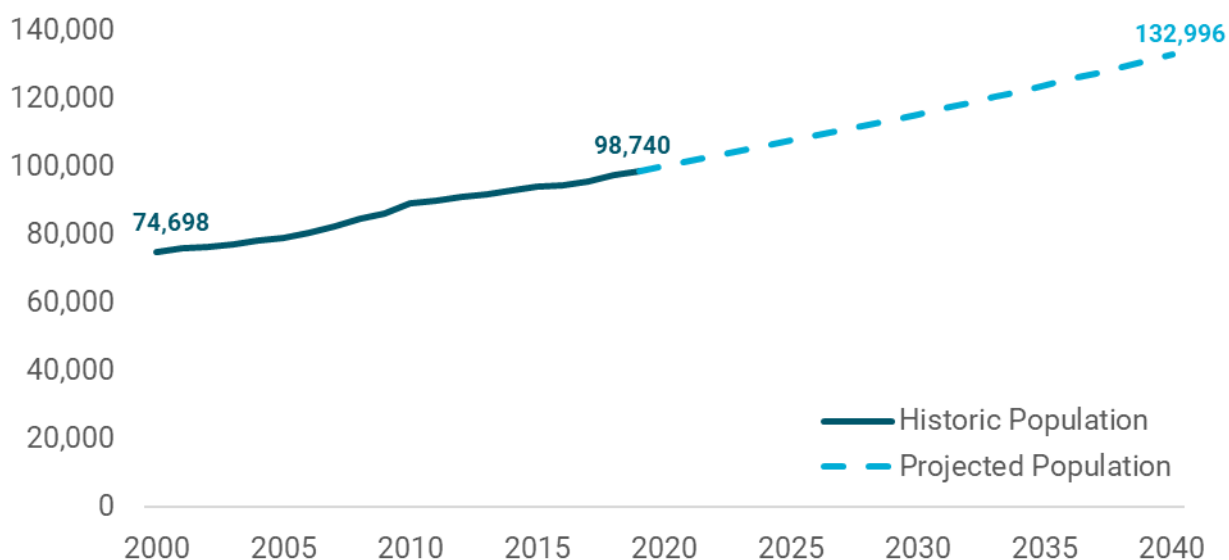
Grant County has a population of 98,740, which represents a 32% increase since 2000. Medium OFM population projections estimate continued growth patterns to 2040, as shown in Exhibit 139 and Exhibit 140. Demographic projections for Grant County estimate an increase in the proportion of adults over 65 as the Baby Boomer generation ages. This increase is offset by a decrease across age cohorts under age 45. The primary age group for farmworkers, 20-44, is predicted to remain relatively stable as a proportion of the population throughout this period, with a 2% decrease by 2040.

Exhibit 79: Grant County Historical and Projected Growth Rates, 2000-2040

Average Annual Growth	2000-2019	2019-2040 Projected
Individuals	1,265	1,631
Percentage	1.7%	1.7%

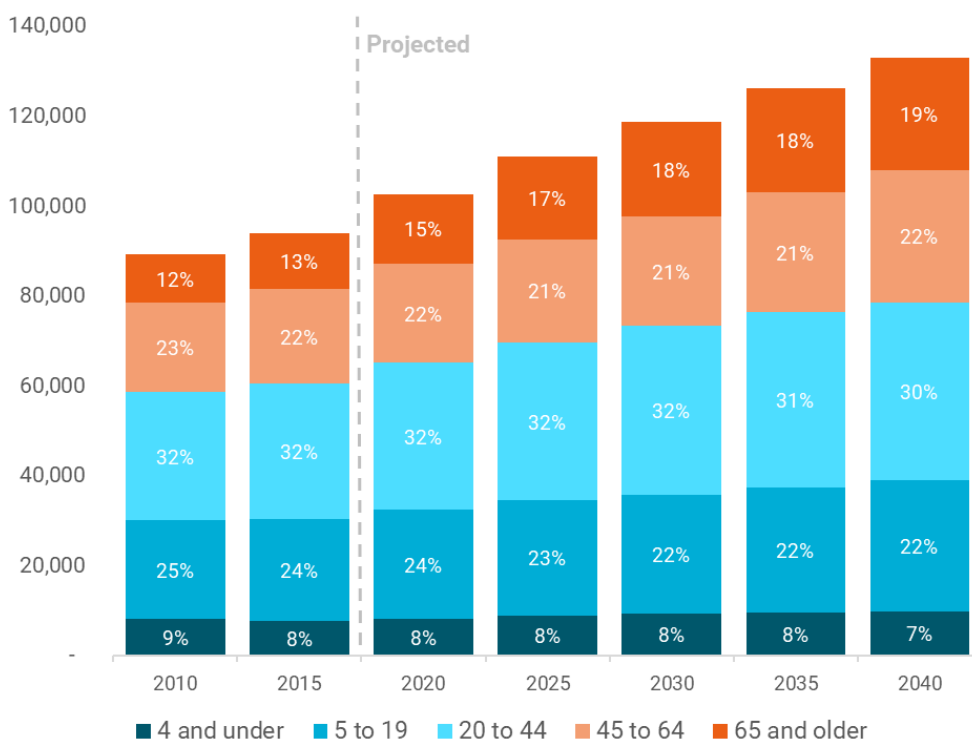
Sources: Washington State Office of Financial Management, 2019; BERK, 2020

Exhibit 80: Grant County Historical and Projected Population, 2000-2040



Sources: Washington OFM, 2019; Yakima County Horizon 2040 Comprehensive Plan; BERK, 2019

Exhibit 81: Grant County Population by Age Cohort, Historical and Projected



Sources: Washington OFM, 2018; BERK, 2019

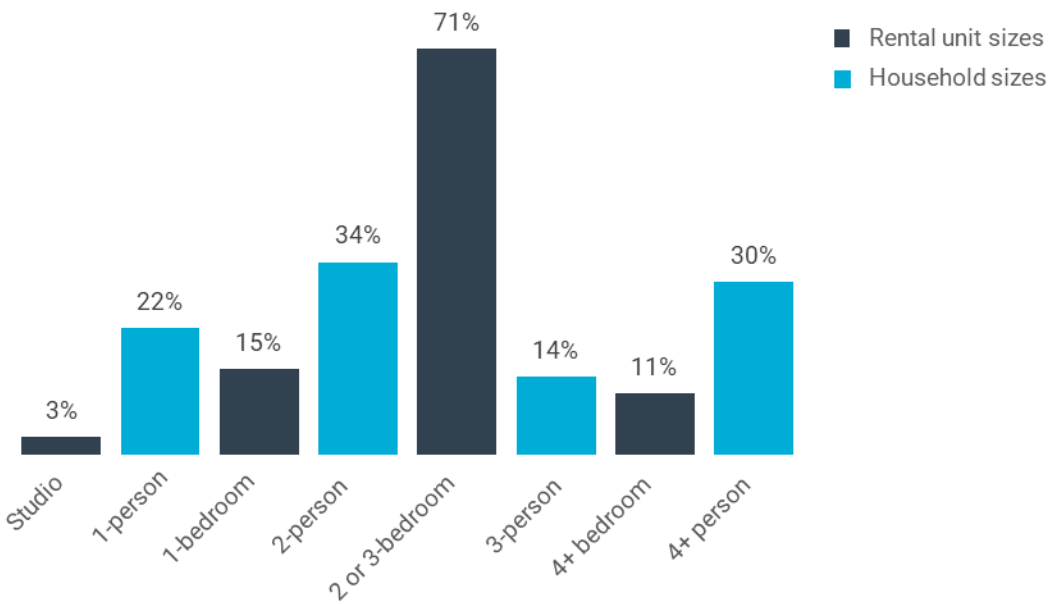
Household Population

The average household size in Grant County is 3.1 people.¹¹⁸ Farmworker households are likely to reflect the general overall trend of household sizes. Almost 40% of Grant County households, or 11,705 households, are renters. Survey data suggests that this rate is higher among the farmworker population. This may result in a mismatch of household size and housing stock for agricultural workers who rent and live with children or extended family members, further explored in Exhibit 82. Two- and three-bedroom units represent the majority of rental units available in Grant County. However, 30% of the population has more than four household members. Larger multifamily units with 4+ bedrooms are limited in the rental market (in Grant County, only 11% of rental units are this size), increasing the likelihood of overcrowding and “bunking up” arrangements if households cannot afford to purchase a home.¹¹⁹

¹¹⁸ American Community Survey, Table DP02 5-year Estimates, 2014-2018.

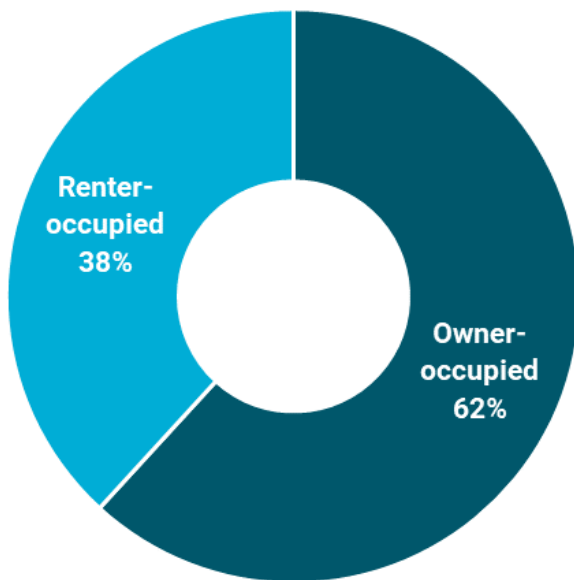
¹¹⁹ American Community Survey, Table S2504 5-year Estimates, 2014-2018.

Exhibit 82: Grant County Household Size and Rental Housing Unit Sizes



Sources: American Community Survey S2501 and S2504 5-Yr Estimates, 2014-2018; BERK, 2020

Exhibit 83: Grant County Housing Tenure by Household, 2018



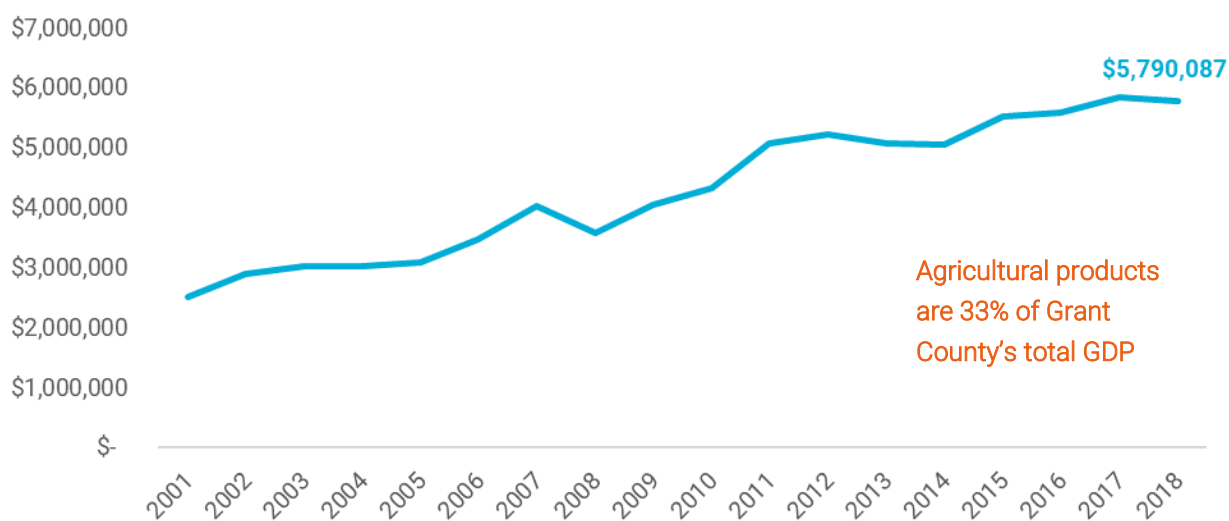
Sources: American Community Survey Table S2501 5-year Estimates, 2014-2018

County Economy

In Grant County, covered farmworkers make up **13% of the labor force**. It is ranked third in the state for year-round employees and second for migrant, covered labor. It is also second in the state for the county's agriculture production value, which accounts for approximately one-third of the total GDP.

- Grant County is one of two counties in ESD's Columbia Basin area, along with Adams County, earning less than the statewide average for annual farmworker wages.
- Top employers include Moses Lake School District, Genie Industries, county government and Samaritan Healthcare.¹²⁰

Exhibit 84: Grant County GDP, All Industries, 2001-2018



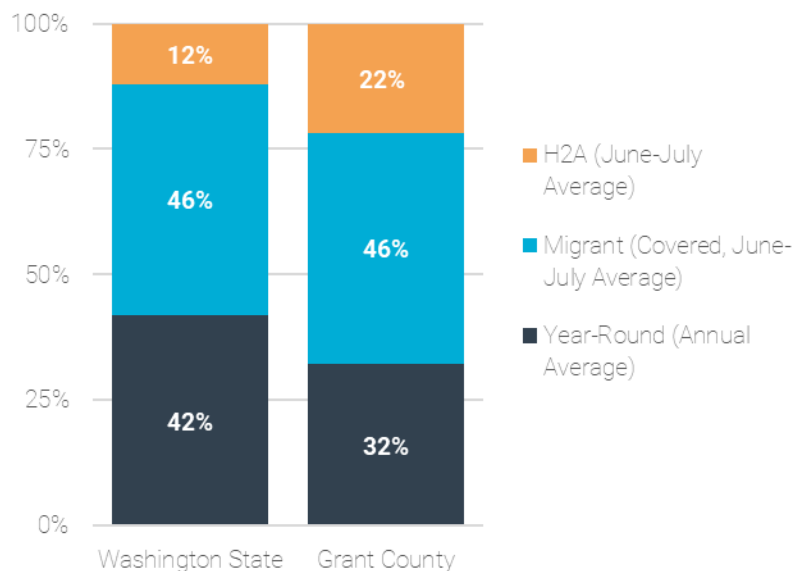
Sources: U.S. Bureau of Economic Analysis (BEA) SAGDP9N series, 2001-2018; BERK, 2020

Farmworker Population

As of 2018, Grant County is home to an estimated **5,483 year-round and covered agricultural jobs**. This number more than doubles during the peak months for migrant employment, from June through August. Compared to statewide averages, Grant County relies less on year-round employment and instead much more heavily upon both H-2A and covered migrant employment.

¹²⁰ Grant County Economic Development Council, "Grant County Largest Employers," (2018), <http://www.grantedc.com/demographics/largest-employers/>

Exhibit 85: 2018 Agricultural Employment by Type, County versus State Averages



Sources: Washington ESD, 2019; U.S. Department of Labor, 2020; BERK, 2020

Exhibit 86: Grant County Farmworker Estimates by Employment Type, 2018

Employment Type	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Year-round	5,546	5,536	5,525	5,513	5,502	5,490	5,478	5,465	5,453	5,440	5,428	5,415
Migrant covered	1,378	2,368	3,168	3,506	4,172	6,614	9,066	6,592	7,135	5,084	3,213	1,734
Migrant H-2A*	1,019	2,674	3,310	3,346	3,419	3,898	3,487	3,055	761	149	0	0
Total estimated monthly employment	7,943	10,578	12,003	12,365	13,093	16,002	18,031	15,112	13,349	10,673	8,641	7,149

*Statewide requests provided by ESD and discounted 75% to reflect actual versus requested workers; County estimates based on Department of Labor percentages of worker requests by county

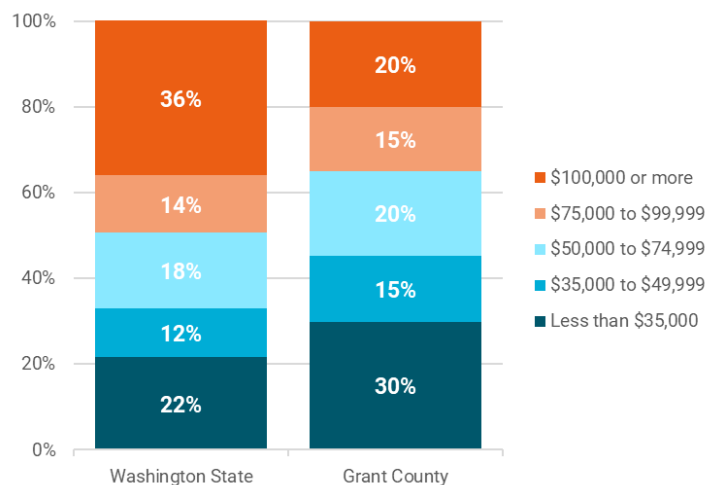
Sources: ESD, Employment Connections Division - Foreign Labor Certification Program; BERK, 2020

Income Summary

Grant County households have lower incomes than state averages. There is both a higher percentage of households earning less than \$50,000 per year and a lower percentage of households earning greater than \$100,000 per year. Based on ESD income and wages reporting,

farmworker households are likely to earn less than \$35,000 per year without additional income from secondary employment or other household members. This income level is below the HUD area median family income for 2018, \$59,900.

Exhibit 87: Grant County, Household Income Brackets



Thirty percent of Grant County households earn less than \$35,000 annually. Many farmworker households are likely to be included in this group, as the 2018 regional average annual salary for agricultural workers was \$29,861.

Sources: American Community Survey S1901 5-Yr Estimates, 2010 & 2018; BERK, 2020

Estimated wages for farmworkers are below the median family income (MFI) for Grant County, at any family size. A household earning the regional average for farmworkers earns 50% of MFI in Grant County, classified as very low-income for three or more person households (30-49% MFI) and low-income for a single person and two-person households (50-79% MFI).

- Median family income for Grant County (2018 - HUD): \$59,900
- Average annual income for Columbia Basin farmworkers (2018):¹²¹ \$28,861

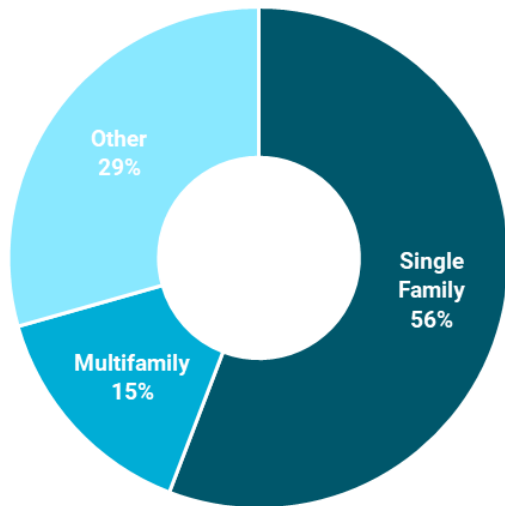
Housing Inventory

There are 38,335 housing units in Grant County. A high percentage (29% compared to 8% statewide) of these are classified as 'other,' including mobile homes and other special housing types. This high percentage may correlate to the high number of farmworkers living in temporary housing types. There are not enough rental units for Grant County rental estimates to register with research databases. Home values are high enough that the estimated mortgage for an

¹²¹ 2018 average wages projected based on average annual growth rates over 5 years, as reported by ESD, 2019.

average home results in a cost burden on farmworker wages. Based on information from the Washington Center for Real Estate Research, Housing Market Summary Q4 2018, 23% of homes for sale are \$160,000 or less, which is a more affordable price point.

Exhibit 88: Total Housing Units by Type, Grant County 2018



Sources: Washington OFM, 2018; BERK, 2020

In recent years, housing prices in Grant County have risen faster than regional farmworker incomes, with home prices increasing 37%, compared to 15% for wages. See Exhibit 89. This trend has exacerbated affordability issues. **Given the regional average annual wages for farmworkers, housing is considered affordable at rates of \$747 per month or less.**

Exhibit 89: Grant County, Percent Change for Farmworker Wages versus Housing Prices, 2012 to 2018



Sources: Washington ESD, 2020; Washington Center for Real Estate Research, 2012 & 2018; BERK, 2021

Rental Housing

There are not enough rental housing units in Grant County for the Washington Center for Real Estate Research to include with its bi-annual report findings.

Home Ownership

The median price of a home in Grant County is \$212,300.¹²² For a farmworker household earning annual average wages, the estimated mortgage payment on this price of a home results in a **cost burden**. A more affordable average home price is \$160,000 or less, assuming the ability to save for a \$32,000 (20%) down payment. Approximately 23% of Grant County housing units are available in this price range. This down payment will be out of reach for many families, and as down payment size decreases, monthly mortgage payments increase.

¹²² Washington Center for Real Estate Research, Housing Market Summary Q4 2018.

Okanogon County

Key Takeaways



As many as **1,645** farmworker households search for housing through local, market rate options in Okanogon County.



Ten percent (10%) of this need is for migratory workers, who have more unique and potentially term-limited housing needs. This is complicated by the reality that there is a very limited stock of multifamily housing in Okanogon County. It is likely that many of these workers are living in less permanent forms of housing, such as mobile homes, as these comprise a quarter of the local housing stock.

In 2018, Okanogon County had...



1,956 year-round agricultural jobs.

Farmworker housing resources in the area offered housing units to 4% of this total.



7,628 migratory jobs available during peak months.

Provided housing covers 93% of estimated local workers. The remaining 170 compete for limited rental housing units alongside year-round farmworker households and all other permanent rental residents of Okanogon County.

Permanent Housing (units)

1,552 Estimated Workers
- 77 Provided Units

1,475 Estimated Gap

Seasonal Housing (beds)

5,302 Estimated Workers
- 5,132 Provided Beds

170 Estimated Gap



Housing affordability is a challenge for farmworkers. Average annual wages for farmworkers are below the median family income for all household sizes. The average home value results in severe cost burden for farmworker wages.



It is likely that many farmworker households are renters. **With limited rental housing stock, farmworker households, particularly those with larger families, may struggle to secure adequate accommodation at an affordable rate.**

Introduction

Okanogan County is part of the north-central state reporting area. It borders Canada to the north, and much of the county's eastern portion is designated as Colville Reservation tribal land. There are 1,192 farms and more than 105,000 acres of agricultural lands, primarily running north to south along highway 97.¹²³

Okanogan County is Washington's eighth most productive county for agriculture, measured by the value of production, and is ranked seventh for year-round agricultural employment. Major agricultural commodities include apples, cherries and pears.¹²⁴ Other major sectors of employment are government services, retail trade, and healthcare and social assistance.¹²⁵

The county has a population of 42,730, which is largely rural – 61% live in unincorporated areas.¹²⁶ Okanogan County's largest city is Omak, with 12% of the population, and the county seat is Okanogan.

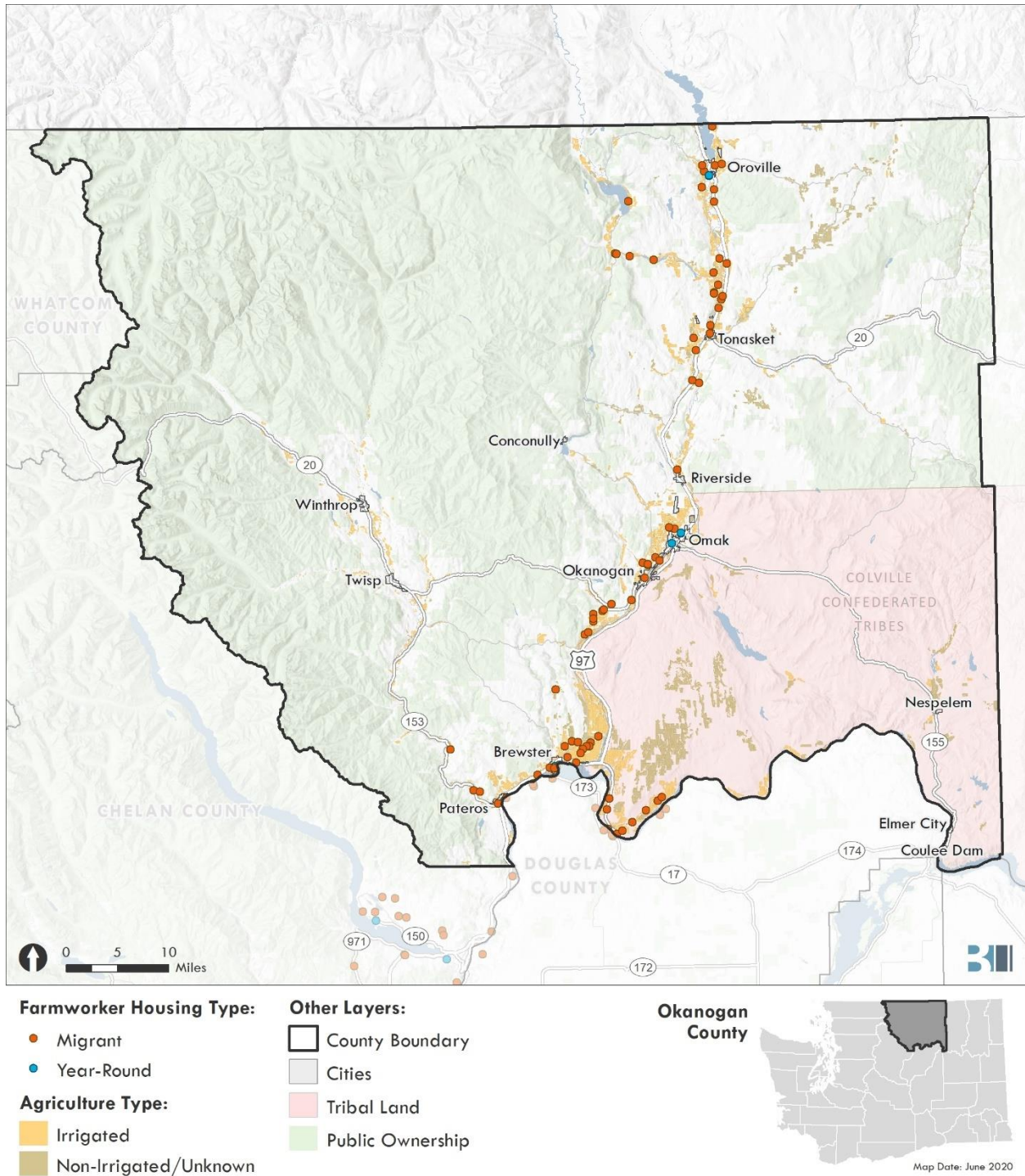
¹²³ Washington State Department of Agriculture, "Washington Agriculture Snapshot," (October 2021).

¹²⁴ Washington State Department of Agriculture, 2012.

¹²⁵ Washington State Employment Security Department, Average annual employment by 2-digit NAICS codes, 2018.

¹²⁶ Office of Financial Management, 2019.

Exhibit 90: Okanogan County Agricultural Land and Farmworker Housing Units, 2019



Sources: Housing Data from Washington DOH, 2019; Washington State Housing Finance Commission, 2019; Office of Rural and Farmworker Housing, 2019; WSDA, 2019

Population Summary

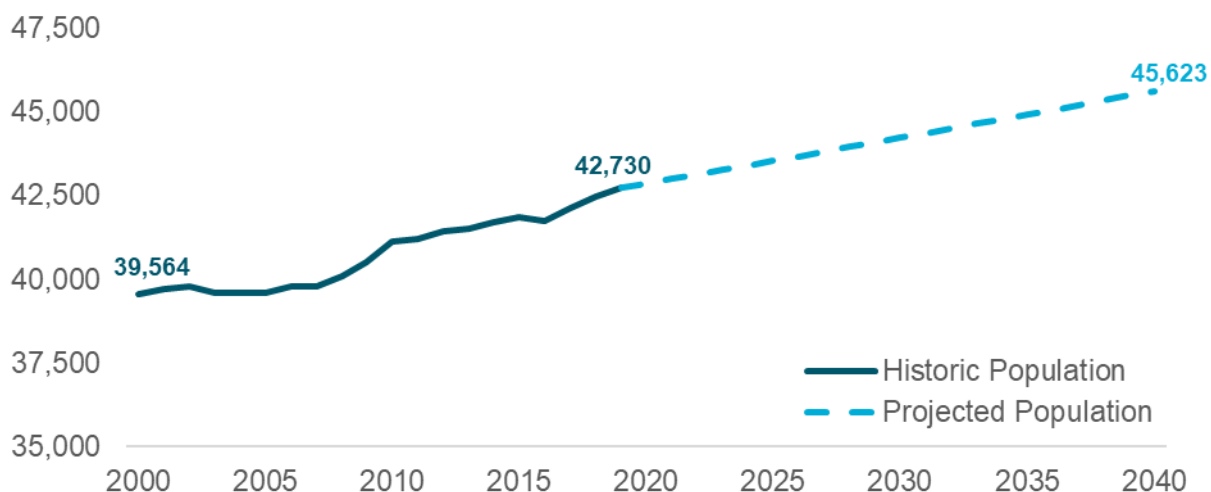
Okanogan County has a population of 42,730, representing an 8% increase 2000-2019, a slower pace of growth than many other counties. Medium OFM population projections estimate continued growth patterns to 2040, as shown in Exhibit 139 and Exhibit 140. Demographic projections for Okanogan County estimate a substantial shift proportionally toward older adults (65+) as Baby Boomers age. This is offset by a shrinking of the 45-64 cohort. The primary age group for farmworkers, 20-44, is predicted to remain relatively stable as a proportion of the population throughout this period.

Exhibit 91: Okanogan County Historical and Projected Growth Rates, 2000-2040

Average Annual Growth	2000-2019	2019-2040 Projected
Individuals	167	138
Percentage	0.4%	0.3%

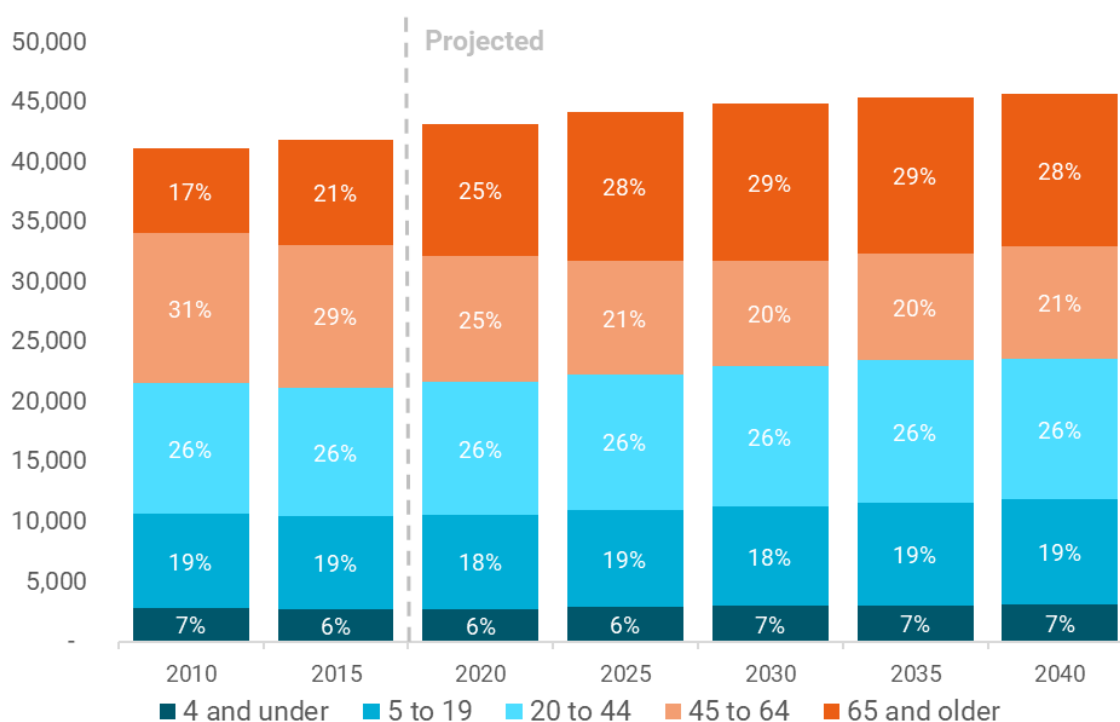
Sources: Washington OFM, 2019; BERK, 2020

Exhibit 92: Okanogan County Historical and Projected Population, 2000-2040



Sources: Washington OFM, 2019; PSRC, 2019; BERK, 2020

Exhibit 93: Okanogan Population by Age Cohort, Historical and Projected



Sources: Washington OFM, 2018; BERK, 2019

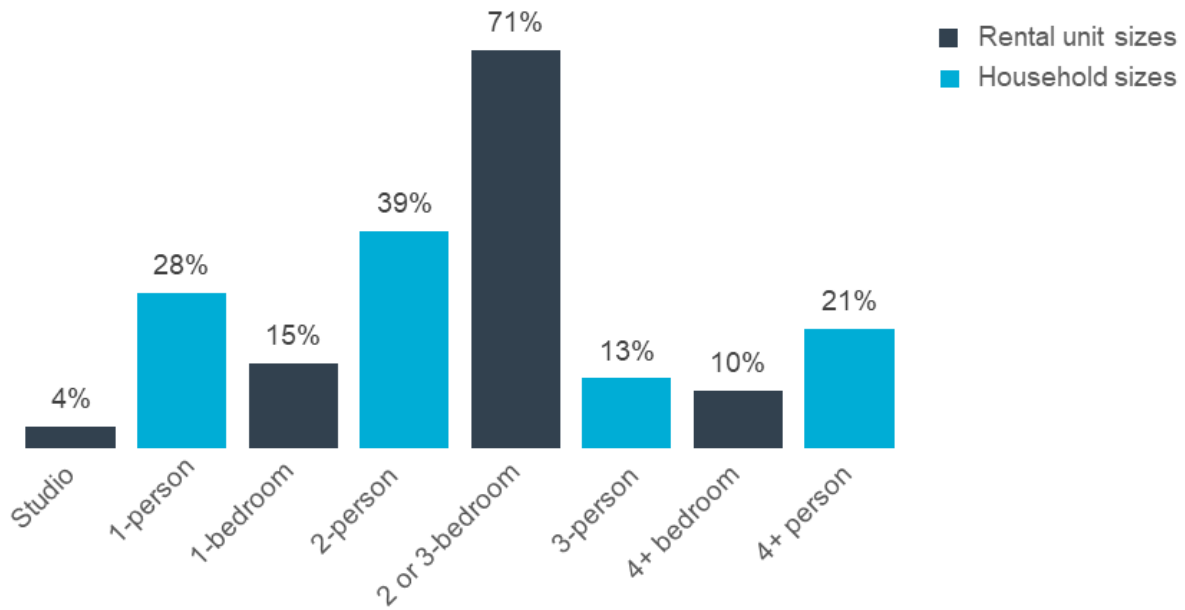
Household Population

The average household size in Okanogan County is 2.3 people.¹²⁷ Farmworker households are likely to reflect the general overall trend of household sizes. One-third (34%) of Okanogan County households, or 5,926 households, are renters. Survey data suggests that this rate is higher among the farmworker population (see Exhibit 27). This may result in a mismatch of household size and housing stock for agricultural workers who rent and live with children or extended family members, further explored in Exhibit 22. Two- and three-bedroom units represent the majority of rental units available in Okanogan County. **However, 21% of households have four or more members.** Only 10% of rentals in Okanogan County have four or more bedrooms, increasing the likelihood of overcrowding and “bunking up” arrangements if households cannot afford to purchase a home.¹²⁸

¹²⁷ American Community Survey, Table DP02 5-year Estimates, 2014-2018.

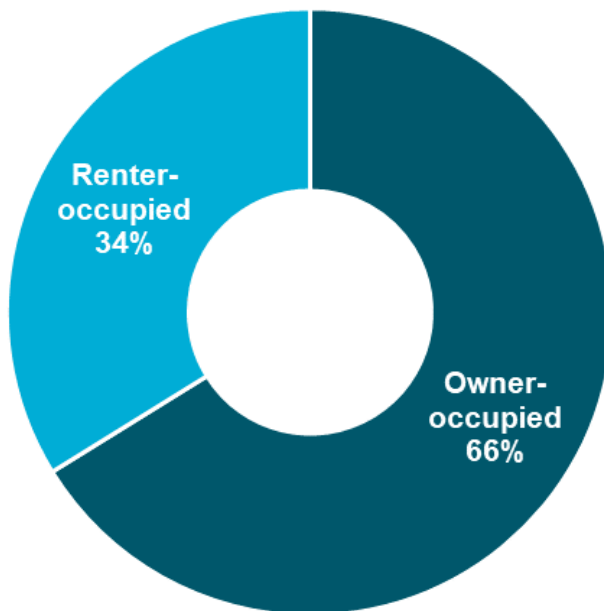
¹²⁸ American Community Survey, Table S2504 5-year Estimates, 2014-2018.

Exhibit 94: Okanogan County Household Size and Rental Unit Size, by Number of Bedrooms



Sources: American Community Survey S2501 and S2504 5-Yr Estimates, 2014-2018; BERK, 2020

Exhibit 95: Okanogan County Housing Tenure by Household, 2018



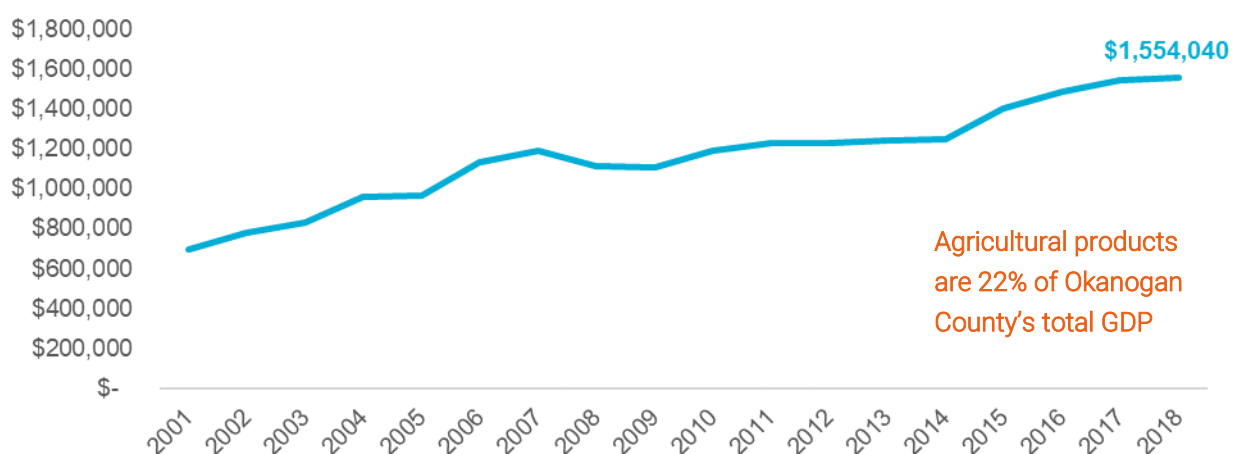
Sources: American Community Survey Table S2501 5-year Estimates, 2014-2018; BERK, 2020

County Economy

In Okanogan County, agricultural employment makes up **10% of the labor force**. Agricultural products comprise 22% of total GDP, making the sector central to the local economy.

- Okanogan County is one of three counties in ESD's north-central area, along with Douglas and Chelan counties. Farmworker earnings in this region are the lowest of the six-state reporting areas.
- Top employers include Colville Confederated Tribes, Gebber Farms, Wal-Mart and Mid-Valley Hospital & Clinic.¹²⁹

Exhibit 96: Okanogan County GDP, All Industries



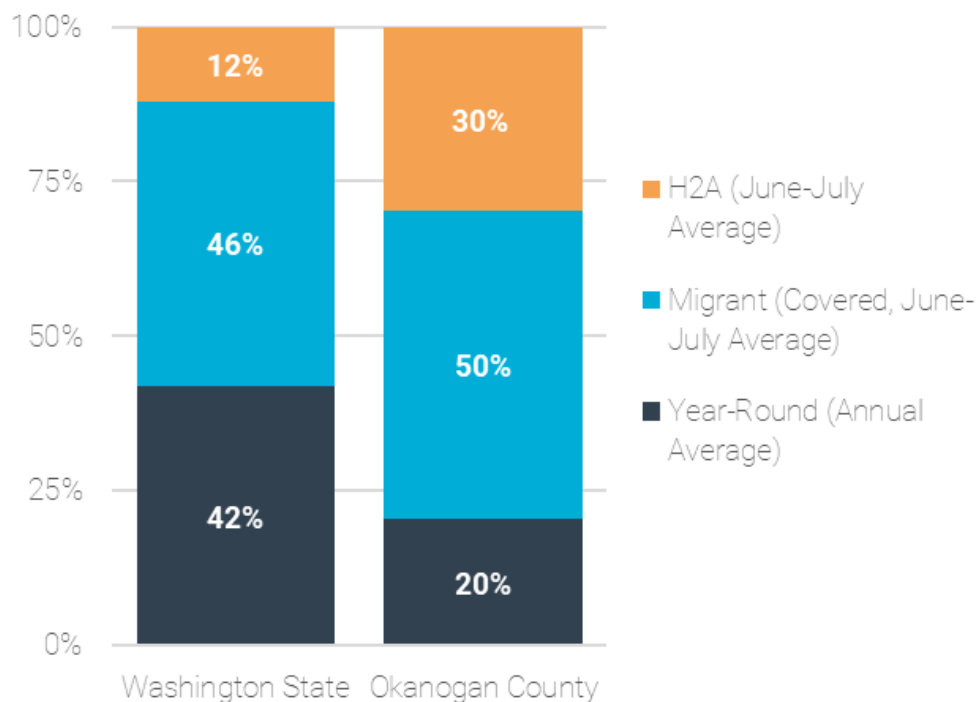
Sources: U.S. Bureau of Economic Analysis (BEA) SAGDP9N series, 2001-2018; BERK, 2020

Farmworker Population

As of 2018, Okanogan County is home to an estimated **1,956 year-round and covered agricultural jobs**, which more than triples during the peak months, with migrant employment in March through August. Compared to statewide averages, Okanogan County relies heavily upon H-2A employment. H-2A workers comprise over 40% of employment estimates for the county, compared to 16% for the state.

¹²⁹ Adams County Development Council, "Leading Industries," (2013), <https://www.growadamscounty.com/business-resources/largest-employers/>

Exhibit 97: 2018 Agricultural Employment by Type, County versus State Averages



Sources: Washington ESD, 2019; U.S. Department of Labor, 2020; BERK, 2020

Exhibit 98: Okanogan County Farmworker Estimates by Employment Type, 2018

Employment Type	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Year-round	2,178	2,138	2,098	2,058	2,017	1,976	1,936	1,895	1,854	1,814	1,773	1,732
Migrant covered	936	1,492	1,737	2,280	2,457	3,718	5,831	4,011	4,616	3,289	1,938	1,531
Migrant H-2A*	1,844	2,002	3,513	3,565	3,632	3,705	2,003	1,842	145	105	26	0
Total estimated monthly employment	4,958	5,632	7,348	7,903	8,106	9,399	9,770	7,748	6,615	5,208	3,737	3,263

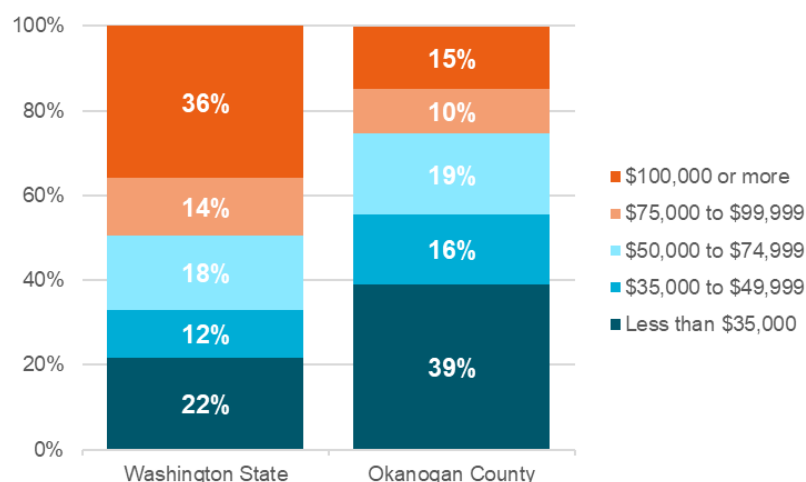
*Statewide requests provided by ESD and discounted 75% to reflect actual versus requested workers; County estimates based on Department of Labor percentages of worker requests by county

Sources: Employment Security Department, Employment Connections Division - Foreign Labor Certification Program; BERK, 2020

Income Summary

Okanogan County households have lower incomes than state averages. There is a much higher percentage of households earning less than \$50,000 per year (39% versus 22%) and a lower percentage of households earning greater than \$100,000 per year (15% versus 36%). Based on ESD income and wages reporting, farmworker households are likely to earn less than \$35,000 per year without additional income contributed from secondary employment or other household members. This income level is also well below the HUD-area median family income for 2018: \$51,200.

Exhibit 99: State and County Household Income Brackets



Almost 40% of Okanogan County households earn less than \$35,000 annually. Many farmworker households are likely to be included in this group, as the 2018 regional average annual salary for agricultural workers was \$26,625.

Sources: American Community Survey S1901 5-Yr Estimates, 2014-2018; BERK, 2020

Estimated wages for farmworkers are below the median family income (MFI) for Okanogan County, at any family size. A household earning the regional average for farmworkers earns 52% of MFI in Okanogan County, classified as very low-income (30-49% MFI) for three or more members and low-income (50-79% MFI) for singles or two-person households.

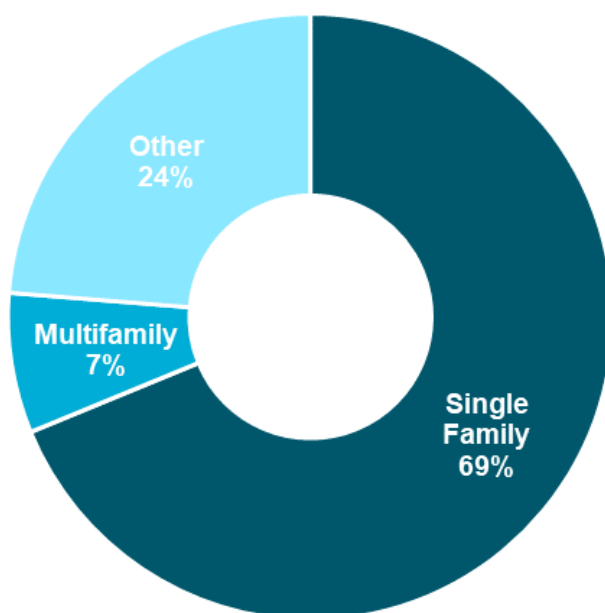
- Median family income for Okanogan County (2018 - HUD): \$51,200
- Average annual income for north central farmworkers (2018):¹³⁰ \$26,625

¹³⁰ 2018 average wages projected based on average annual growth rates over 5 years, as reported by ESD, 2019.

Housing Inventory

There are 23,361 housing units in Okanogan County. A high percentage of these (24%) are classified as 'other,' including mobile homes and other special housing types, compared to a statewide average of 8%. This high percentage may correlate to the high number of farmworkers living in temporary housing types. Rental rate reporting in Okanogan County is unreliable due to the limited stock of multifamily units. Homeownership for average-priced houses results in a severe cost burden with farmworker wages. Affordable ownership options represent 5% of the home market for sale.

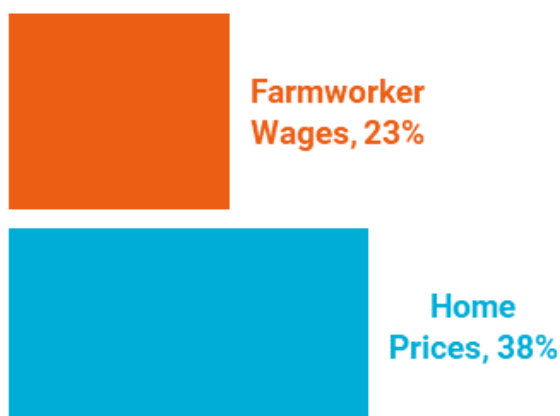
Exhibit 100: Total Housing Units by Type, Okanogan County 2018



Sources: Washington OFM, 2018; BERK, 2020

In recent years, housing prices in Okanogan County have risen faster than regional farmworker incomes, with home prices rising 38% versus 23% for wages. See Exhibit 89. This trend has exacerbated affordability issues. **Given the regional average annual wages for farmworkers, housing is considered affordable at rates of \$666 per month or less.**

Exhibit 101: Okanogan County, Percent Change for Farmworker Wages versus Housing Prices, 2012-2018



Sources: Washington ESD, 2020; Washington Center for Real Estate Research, 2012 & 2018; BERK, 2021

Rental Housing

There are not enough rental housing units in Okanogan County for inclusion in the Washington Center for Real Estate Research’s biannual survey.

Home Ownership

The median price of a home in Okanogan County is \$213,500.¹³¹ For a farmworker household earning annual average wages, the estimated mortgage payment on this price of a home results in a **severe cost burden**. A more affordable home price point is \$80,000 or less, assuming the ability to save for a \$16,000 (20%) down payment. Approximately 5% of Okanogan County housing units are in this price range. This down payment will be out of reach for many families, and as down payment size decreases, monthly mortgage payments increase.

¹³¹ Ibid.

Skagit County

Key Takeaways



As many as **1,377** farmworker households search for housing through local, market rate options in Skagit County.



Seventeen percent (17%) of this need is for migratory workers, who have more unique and potentially term-limited housing needs. This is complicated by the reality that there is a very limited stock of multifamily housing and extremely low rental vacancy in Skagit County.

In 2018, Skagit County had...



1,737 year-round agricultural jobs.

Farmworker housing resources in the area offered housing units to 17% of estimated workers.



1,356 migratory jobs available during peak months.

Provided housing covers 66% of estimated local workers. The remaining 238 compete for rental units along with year-round farmworker households and all other rental households of Skagit County.

Permanent Housing (units)

1,378 Estimated Workers
- 240 Provided Units

1,138 Estimated Gap

Seasonal Housing (beds)

699 Estimated Workers
- 461 Provided Beds

238 Estimated Gap



Housing affordability is a challenge for farmworkers. Average annual wages for farmworkers are below the median family income for all household sizes. The average home value results in severe cost burden for farmworker wages, and less than 5% of the available housing stock is affordable with farmworker wages.



It is likely that many farmworker households are renters. **There is extremely low rental vacancy in Skagit County (0.5%) and a low proportion of multifamily units in the housing stock.** Rental rates, even for smaller unit sizes, result in cost burden with farmworker wages. Farmworker families with 4+ members may encounter additional difficulty locating adequate rental accommodations at an affordable rate.

Introduction

Skagit County is in the western reporting area, situated between Whatcom and Snohomish counties to the north and south. The Puget Sound coastline forms its western border, and much of the eastern county is dedicated as public lands. Interstate 5 and Highways 9 and 20 are the primary routes through the county, connecting many incorporated areas. There are 1,041 farms and more than 84,000 acres of agricultural lands, most prevalent in western parts of the county.¹³²

Skagit County is Washington's ninth most productive county for agriculture, measured by the value of production, and is ranked eighth for year-round agricultural employment. Major commodities include flowers, milk and potatoes.¹³³ Other major sectors of employment are government services, manufacturing and retail trade.¹³⁴

The county has a population of 129,200, with 41% of its residents in unincorporated areas.¹³⁵ Mount Vernon is the largest city and county seat, with 28% of the county population.

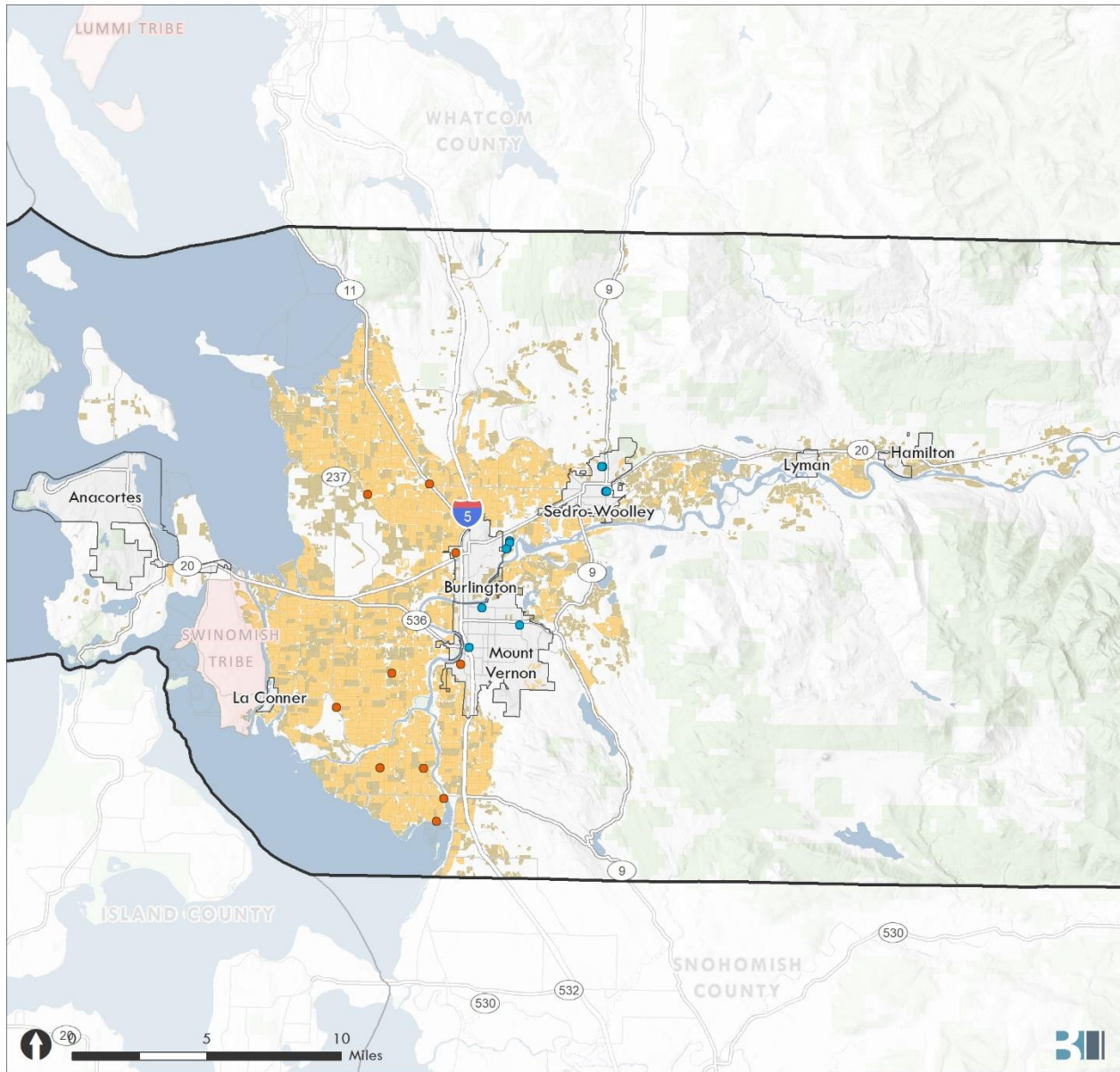
¹³² Washington State Department of Agriculture, "Washington Agriculture Snapshot," (October 2021).

¹³³ Washington State Department of Agriculture, 2012.

¹³⁴ Washington State Employment Security Department, Average annual employment by 2-digit NAICS codes, 2018.

¹³⁵ Office of Financial Management, 2019.

Exhibit 102: Skagit County Agricultural Land and Farmworker Housing Units, 2019



- | | |
|---------------------------------|----------------------|
| Farmworker Housing Type: | Other Layers: |
| ● Migrant | □ County Boundary |
| ● Year-Round | □ Cities |
| Agriculture Type: | □ Tribal Land |
| ■ Irrigated | ■ Public Ownership |
| ■ Non-Irrigated/Unknown | |



Sources: Housing Data from Washington DOH, 2019; Washington State Housing Finance Commission, 2019; Office of Rural and Farmworker Housing, 2019; WSDA, 2019

Population Summary

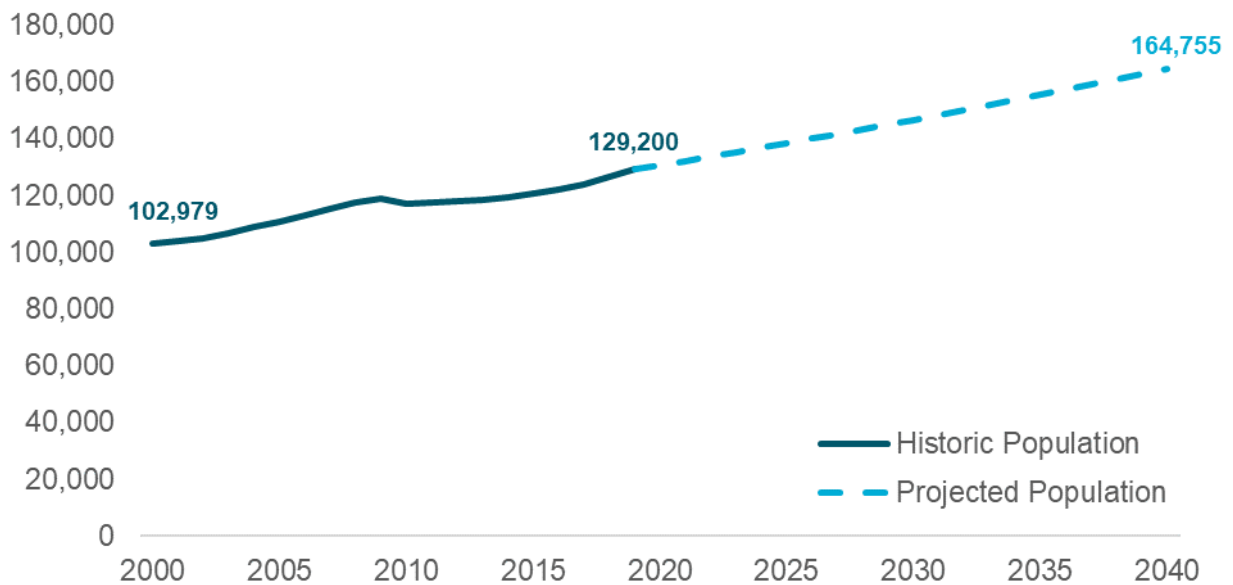
Skagit County has a population of 129,200, which is a 25% increase from 2000 to 2019. Medium OFM population projections estimate continued growth patterns to 2040, as shown in Exhibit 103 and Exhibit 104. Demographic projections for Skagit County estimate a significant increase in the older adult population (aged 65+) with a corresponding decrease in the primary working-age cohorts (ages 20-64). The primary age group for farmworkers, 20-44, is predicted to decrease from 30% to 27% as a proportion of the population throughout this period.

Exhibit 103: Skagit County Historical and Projected Growth Rates, 2000-2040

Average Annual Growth	2000-2019	2019-2040 Projected
Individuals	1,380	1,693
Percentage	1.3%	1.3%

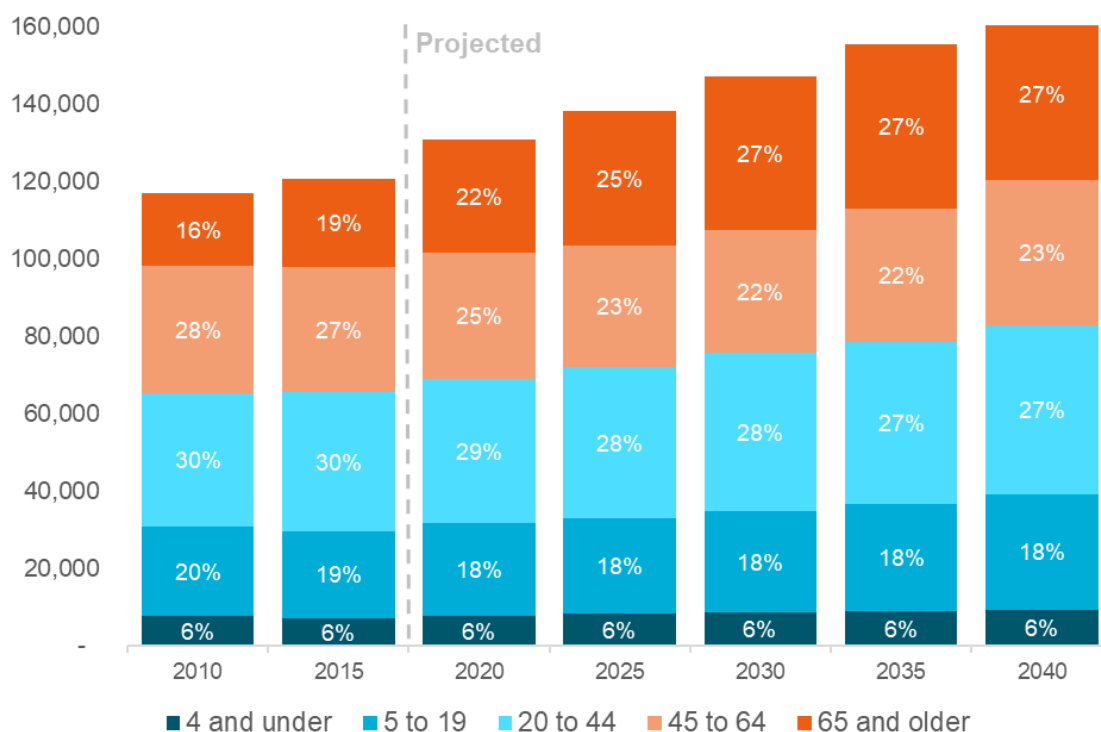
Sources: Washington OFM, 2019; BERK, 2020

Exhibit 104: Skagit County Historical and Projected Population, 2000-2040



Sources: Washington OFM, 2019; Yakima County Horizon 2040 Comprehensive Plan; BERK, 2019

Exhibit 105: Skagit County Population by Age Cohort, Historical and Projected



Sources: Washington OFM, 2018; BERK, 2019

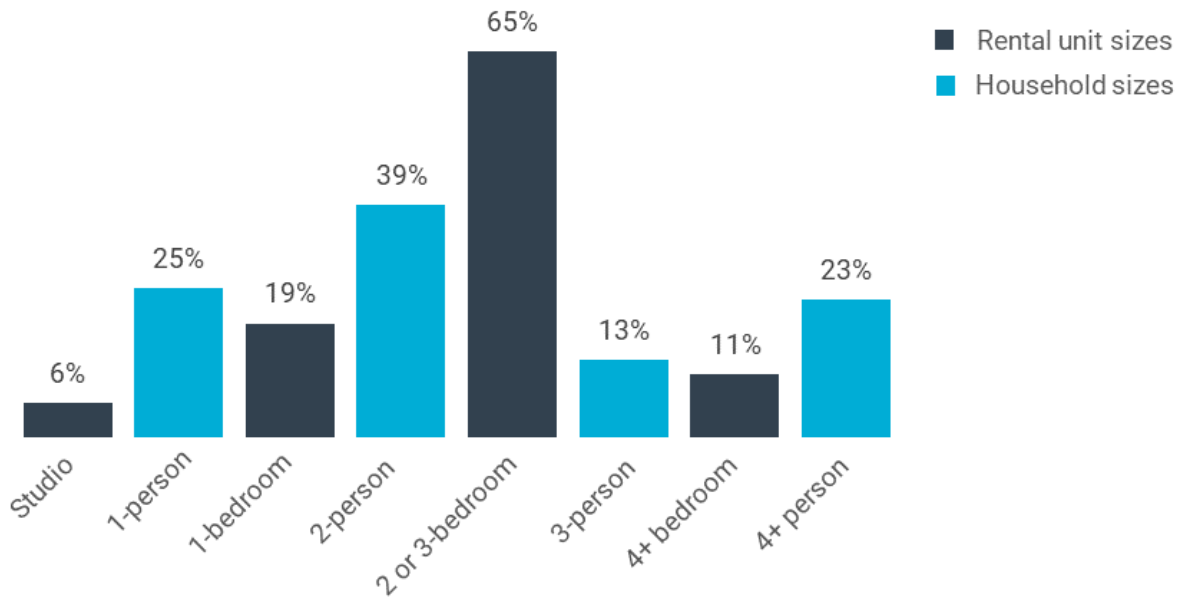
Household Population

The average household size in Skagit County is 2.6 people.¹³⁶ Farmworker households are likely to reflect the general overall trend of household sizes. Almost one-third (32%) of Skagit County households, or 15,559 households, are renters. Survey data suggests that this rate is higher among the farmworker population, whose migratory patterns and lower annual earnings (see Exhibit 111) are more compatible with rental housing. This may result in a mismatch of household size and housing stock for agricultural workers who rent and live with children or extended family members. Two- and three-bedroom units represent the majority of rental units available in Skagit County. **However, 23% of households have more than four members. Larger multifamily rental units with 4+ bedrooms are limited; in Skagit County, only 11% of rental units are this size, increasing the likelihood of overcrowding and “bunking up” arrangements if**

¹³⁶ American Community Survey, Table DP02 5-year Estimates, 2014-2018.

households cannot afford to purchase a home.¹³⁷

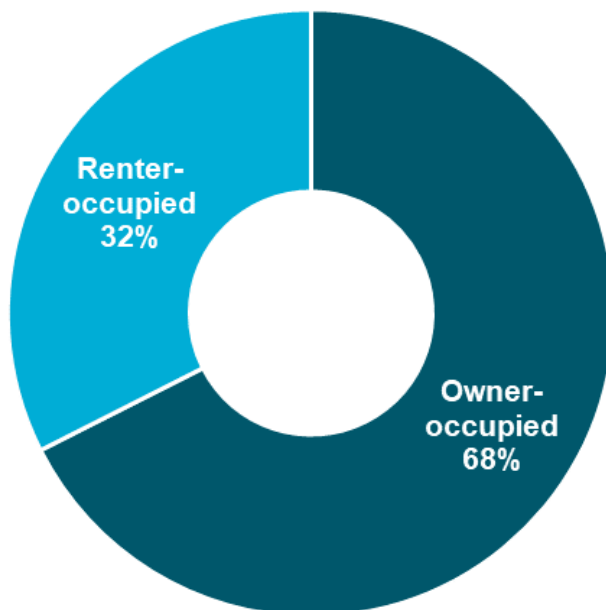
Exhibit 106: Skagit County Household Sizes and Rental Housing Unit Sizes



Sources: American Community Survey S2501 and S2504 5-Yr Estimates, 2014-2018; BERK, 2020

¹³⁷ American Community Survey, Table S2504 5-year Estimates, 2014-2018.

Exhibit 107: Skagit County Housing Tenure by Household, 2018



Sources: American Community Survey Table S2501 5-year Estimates, 2014-2018

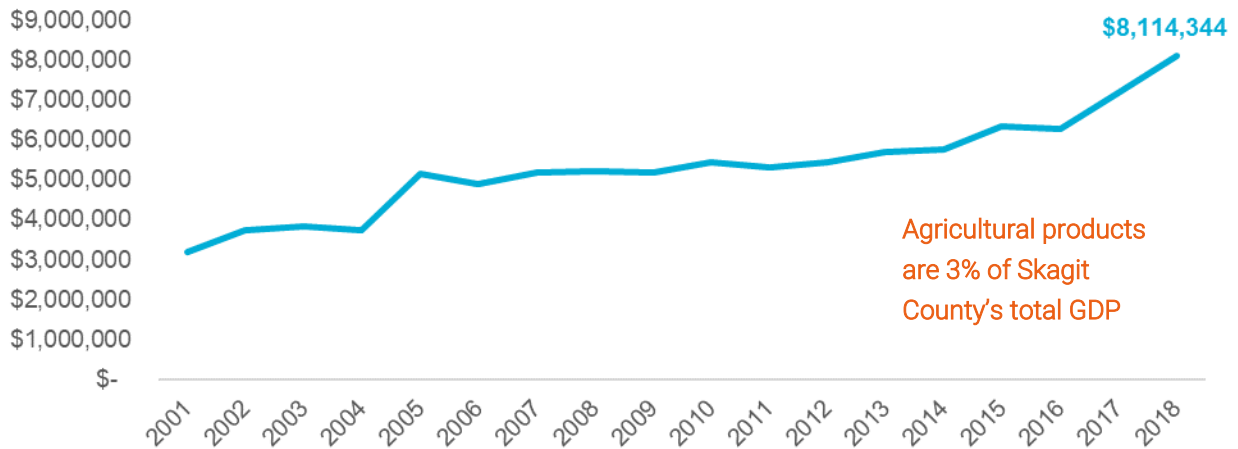
County Economy

In Skagit County, covered farmworkers make up **4% of the labor force** and agricultural products comprise 3% of total GDP. This is a lower amount than many other counties, largely due to the value of its manufacturing economy.

- Skagit County is one of 13 counties in ESD's western area, where farmworkers earn slightly higher annual wages than the statewide average.
- Top employers include Skagit Regional Health, Draper Valley Farms, Mount Vernon School District and Skagit Horticulture LLC.¹³⁸

¹³⁸ Western Washington University, Center of Economic and Business Research, "Skagit County 2018 Top Employers," (2018), <https://cbe.wvu.edu/files/2018%20Skagit%20County%20Top%20Employers.pdf>

Exhibit 108: Skagit County GDP, All Industries

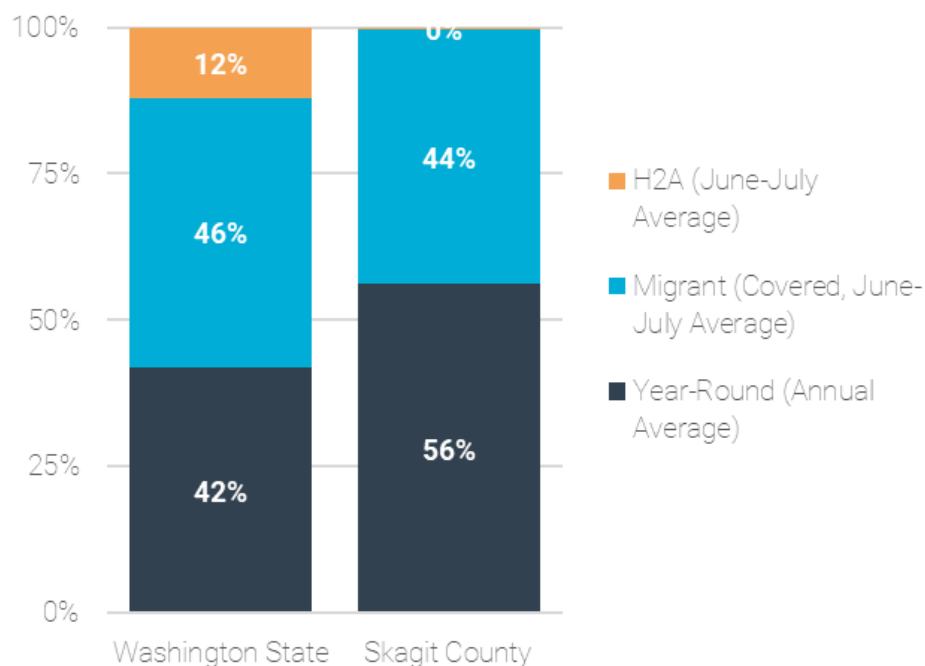


Sources: U.S. Bureau of Economic Analysis (BEA) SAGDP9N series, 2001-2018; BERK, 2020

Farmworker Population

As of 2018, Skagit County is home to an estimated **1,737 year-round and covered agricultural jobs**, which almost doubles during the peak months for migrant employment. Compared to statewide averages, Skagit County applies for very few H-2A visas and employs much higher percentages of year-round workers. These employees will need to secure housing locally.

Exhibit 109: 2018 Agricultural Employment by Type, County versus State Averages



Sources: Washington ESD, 2019; U.S. Department of Labor, 2020; BERK, 2020

Exhibit 110: Skagit County Farmworker Estimates by Employment Type, 2018

Employment Type	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Year-round	1,720	1,723	1,726	1,730	1,733	1,736	1,738	1,741	1,744	1,747	1,750	1,753
Migrant covered	148	426	542	581	674	1,157	1,540	1,454	1,210	987	369	342
Migrant H-2A*	15	15	15	15	15	15	0	0	0	0	0	0
Total estimated monthly employment	1,883	2,164	2,283	2,326	2,422	2,908	3,278	3,195	2,954	2,734	2,119	2,095

*Statewide requests provided by ESD and discounted 75% to reflect actual versus requested workers; County estimates based on Department of Labor percentages of worker requests by county

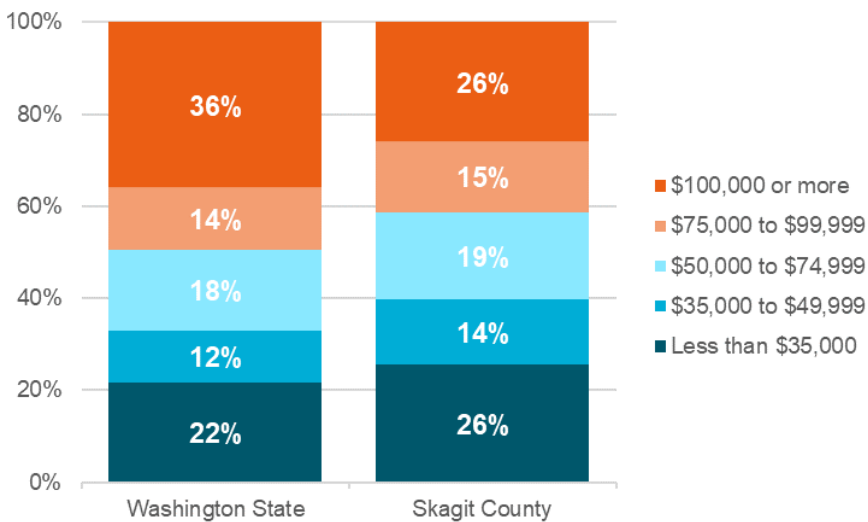
Sources: Employment Security Department, Employment Connections Division - Foreign Labor Certification Program; BERK, 2020

Income Summary

Skagit County households have lower incomes than state averages. There is both a higher

percentage of households earning less than \$50,000 per year and a lower percentage of households earning greater than \$100,000 per year. Based on ESD income and wages reporting, farmworker households are likely to earn less than \$35,000 per year without additional income from secondary employment or other household members. This income level is also well below \$69,100, the HUD-area median family income for 2018.

Exhibit 111: State and County Household Income Brackets



One quarter of Skagit County households earn less than \$35,000 annually. Many farmworker households are likely to be included in this group, as the 2018 regional average annual salary for agricultural workers was \$30,245.

Sources: American Community Survey S1901 5-Yr Estimates, 2010 & 2018; BERK, 2020

Estimated wages for farmworkers are below the median family income (MFI) for Skagit County at any family size. A household earning the regional average for farmworkers earns 44% of MFI in Skagit County, classified as very low-income (30-49% MFI) for households with more than three members and low-income (50-79% MFI) for singles or 2-person households.

- Median family income (2018 - HUD): \$69,100
- Average annual income for western area farmworkers (2018):¹³⁹ \$30,245

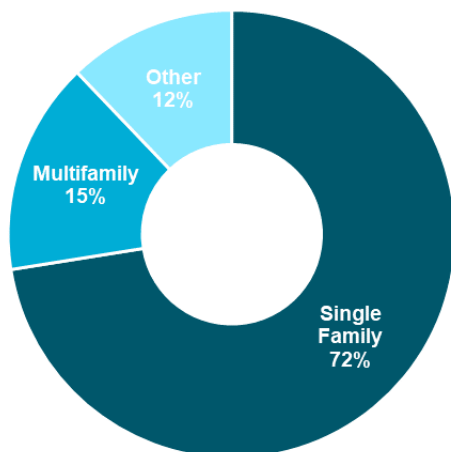
Housing Inventory

There are 53,974 housing units in Skagit County. A high percentage of these are classified as single-family (72% compared to 64% statewide), and there are fewer multi-family units (15%

¹³⁹ 2018 average wages projected based on average annual growth rates over 5 years, as reported by ESD, 2019.

compared to 28% statewide). This limited stock of multifamily units may contribute to the low rental vacancy rate (0.5% compared to 4.3% statewide) and relative inability to afford average rental units. Rent for a typical one-bedroom unit results in a cost burden with farmworker wages, increasing the challenge for farmworker families with multiple members to identify suitable housing in the rental market. Farmworker households looking to purchase a home will also struggle with affordability. Despite the high prevalence of single-family units in Skagit County, few of these will be available and affordable with farmworker wages, which would be cost-burdened with an estimated mortgage for an average home. There are few units for sale (4% of the available stock) in an affordable price range.

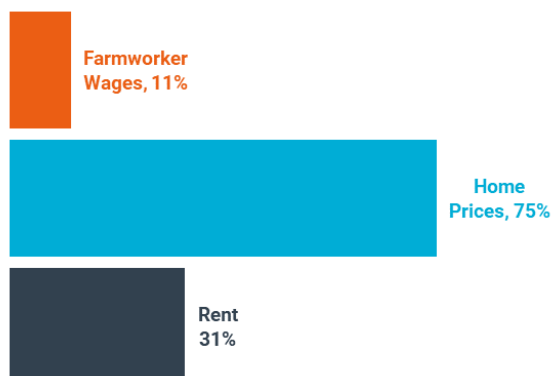
Exhibit 112: Total Housing Units by Type, Skagit County 2018



Sources: Washington State OFM, 2018; BERK, 2020

In recent years, housing prices in Skagit County have risen faster than regional farmworker incomes. Housing prices have increased 75% for ownership, while rent has increased 31%. Wages have increased 11%. See Exhibit 113. This trend has intensified affordability issues. **Given the regional average annual wages for farmworkers, housing is considered affordable at rates of \$756 per month or less.**

Exhibit 113: Skagit County, Percent Change for Farmworker Wages versus Housing Prices, 2012-2018



Sources: Washington ESD, 2020; Washington Center for Real Estate Research, 2012 & 2018; BERK, 2021

Rental Housing

Average rents in Skagit County (2018):¹⁴⁰

- \$930 for 1-bedroom
- \$992 for 2-bedroom
- The rental vacancy rate in Skagit County is 0.5%

Home Ownership

The median price of a home in Skagit County is \$362,300.¹⁴¹ For a farmworker household earning annual average wages, the estimated mortgage payment on this price of a home is a cost burden. A more affordable home price is \$160,000 or less, assuming the ability to save for a \$32,000 (20%) down payment. Approximately 4% of Skagit County housing units are available in this price range. This down payment will be out of reach for many families, and as down payment size decreases, monthly mortgage payments increase.

¹⁴⁰ Washington Center for Real Estate Research, Apartment Market Survey, Fall 2018.

¹⁴¹ Ibid.

Walla Walla County

Key Takeaways



As many as **5,093** farmworker households search for housing through local, market rate options in Walla Walla County.



Forty-seven percent (47%) of this need is for migratory workers, who have more unique and potentially term-limited housing needs. This is complicated by the reality that the rental market in Walla Walla County is incredibly tight, with a very low vacancy rate. Many rental units exceed affordability limits for farmworker households, particularly those with families.

In 2018, Walla Walla County had...



2,148 year-round agricultural jobs.

Farmworker housing resources in the area offered housing units to 3% of this total.



2,921 migratory jobs available during peak months.

Provided housing is estimated as insufficient to include any local workers. These 1,470 workers compete for rental units along with year-round farmworker households and all other renter households in Walla Walla County.

Permanent Housing (units)

	1,705 Estimated Workers
–	59 Provided Units
	1,646 Estimated Gap

Seasonal Housing (beds)

	1,674 Estimated Jobs
–	204 Provided Beds
	1,470 Estimated Gap



Housing affordability is a challenge for farmworkers. Average annual wages for farmworkers are below the median family income for all household sizes. The average home value results in severe cost burden for farmworker wages.



It is likely that many farmworker households are renters. **There is very low rental vacancy in Walla Walla County, and much of the available rental housing is not affordable with farmworker wages.** Farmworker families with 3+ members may find it particularly difficult to secure adequate accommodation at an affordable rate.

Introduction

Walla Walla County is part of the southeastern reporting area. It is on the southern border of Washington, bordering Oregon, with the Snake and Columbia Rivers forming the western and northern borders and Columbia County to the east. Highway 12 and state routes 125 and 124 are major routes through the county, connecting many incorporated areas. There are 903 farms and more than 575,000 acres of agricultural lands covering most of the county.¹⁴²

Walla Walla County is Washington's fifth most productive county for agriculture, measured by the value of production, and is ranked sixth for year-round agricultural employment. Major crops grown include cattle, wheat and apples.¹⁴³ Other major sectors of employment are government services, healthcare and social assistance, and retail trade.¹⁴⁴

The county has a total population of 62,200.¹⁴⁵ The city of Walla Walla is the county seat and major population hub of the county, home to 55% of the total population.

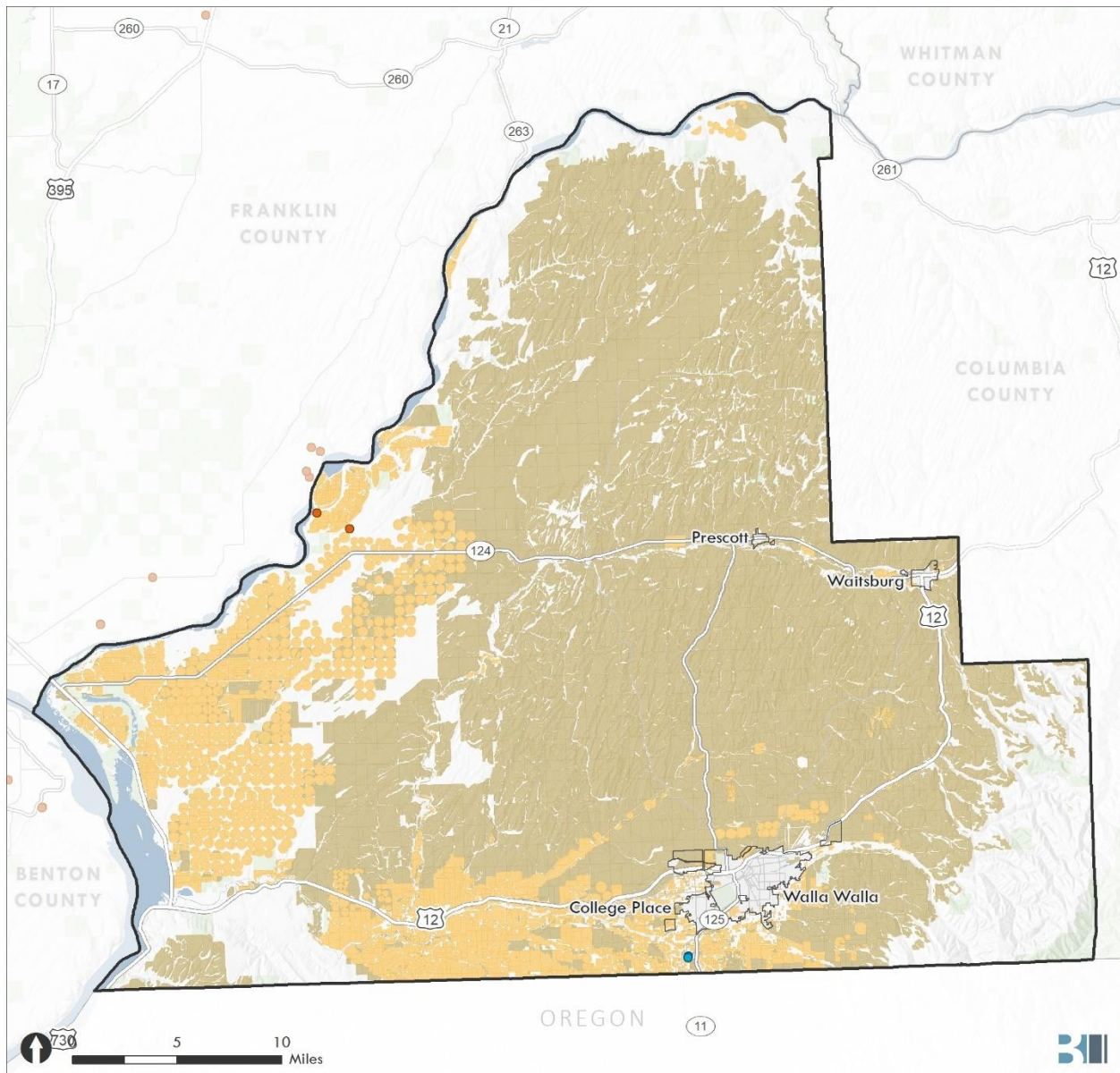
¹⁴² Washington State Department of Agriculture, "Washington Agriculture Snapshot," (October 2021).

¹⁴³ Washington State Department of Agriculture, 2012.

¹⁴⁴ Washington State Employment Security Department, Average annual employment by 2-digit NAICS codes, 2018.

¹⁴⁵ Office of Financial Management, 2019.

Exhibit 114: Walla Walla County Agricultural Land and Farmworker Housing Units, 2019



- | | |
|---------------------------------|----------------------|
| Farmworker Housing Type: | Other Layers: |
| ● Migrant | □ County Boundary |
| ● Year-Round | □ Cities |
| Agriculture Type: | □ Tribal Land |
| ■ Irrigated | ■ Public Ownership |
| ■ Non-Irrigated/Unknown | |

Walla Walla County



Map Date: June 2020

Sources: Housing Data from Washington DOH, 2019; Washington State Housing Finance Commission, 2019; Office of Rural and Farmworker Housing, 2019; WSDA, 2019

Population Summary

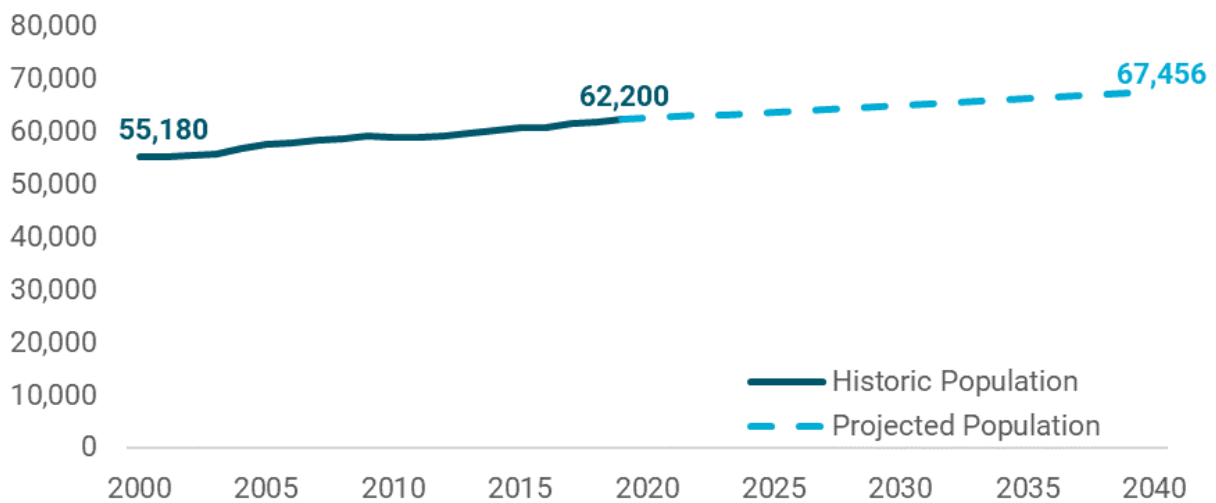
Walla Walla County has a population of 62,200, which is a 13% increase from 2000 to 2019. Medium OFM population projections estimate continued, though slightly decelerated, growth patterns to 2040, as shown in Exhibit 115 and Exhibit 116. Demographic projections for Walla Walla County estimate a relatively stable proportion of age cohorts, with a slightly lower proportion of adults 45-64 offset by proportional increases to older adults (65+) and the 20-44 cohort, which tends to be the prime working-age for farmworkers.

Exhibit 115: Walla Walla County Historical and Projected Growth Rates, 2000-2040

Average Annual Growth	2000-2019	2019-2040 Projected
Individuals		250
Percentage	0.7%	0.4%

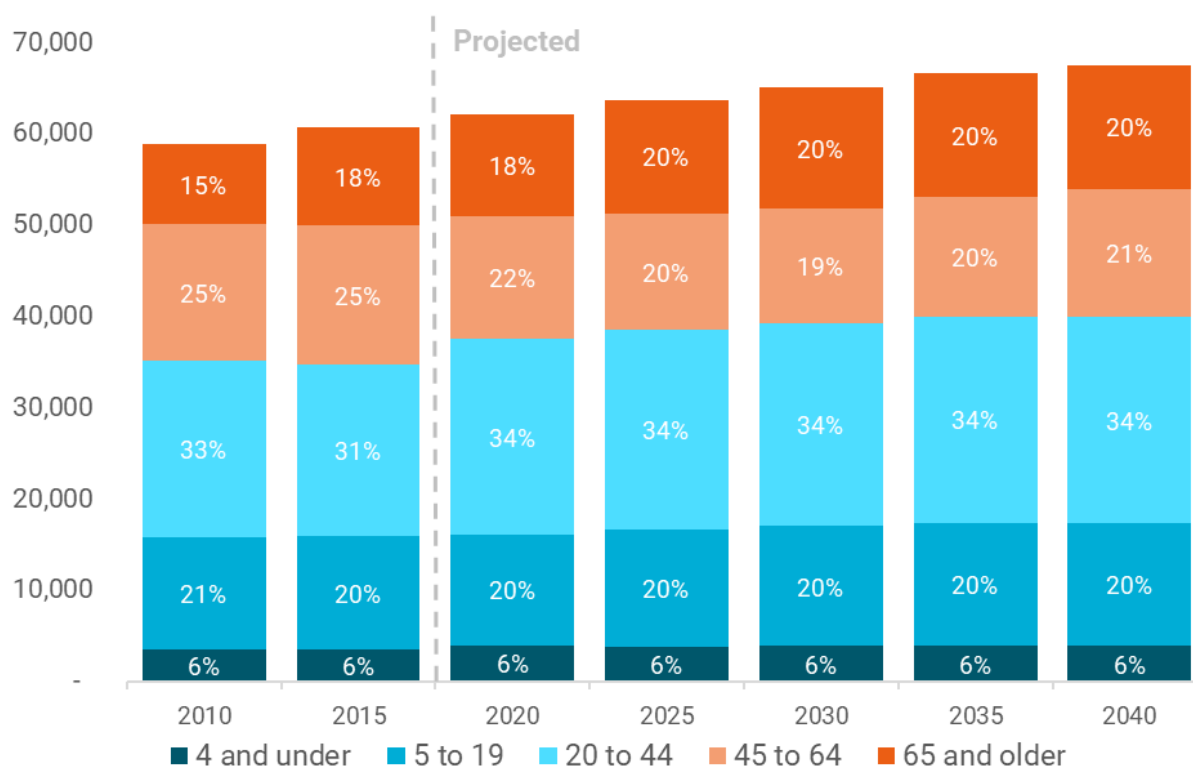
Sources: Washington OFM, 2019; BERK, 2020

Exhibit 116: Walla Walla County Historical and Projected Population, 2000-2040



Sources: Washington OFM, 2019; Yakima County Horizon 2040 Comprehensive Plan; BERK, 2019

Exhibit 117: Walla Walla County Population by Age Cohort, Historical and Projected



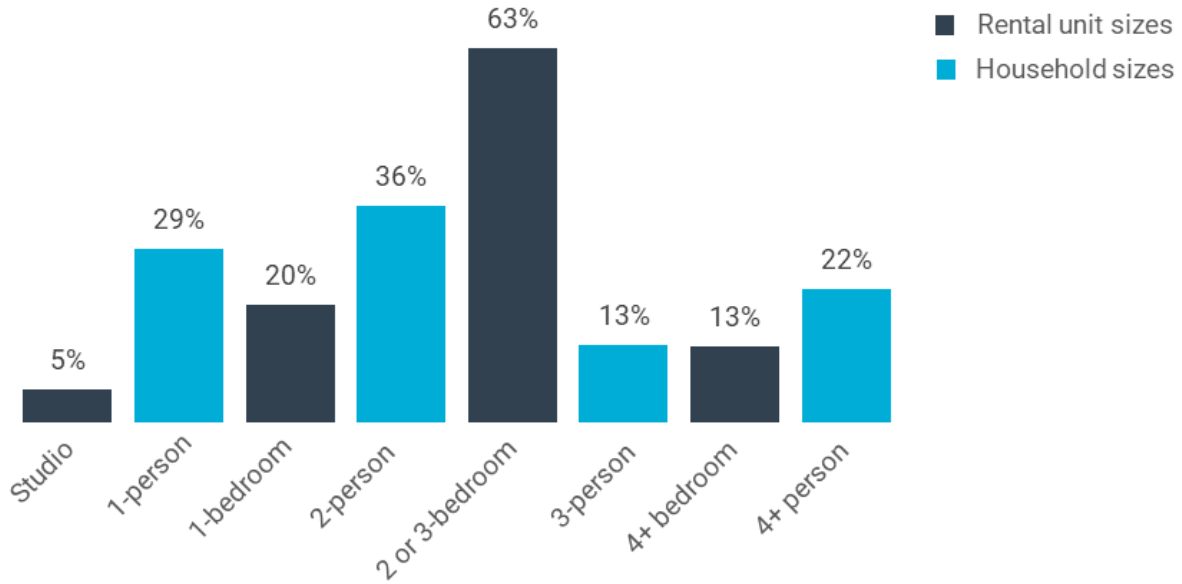
Sources: Washington OFM, 2018; BERK, 2019

Household Population

The average household size in Walla Walla County is 2.5 people.¹⁴⁶ Farmworker households are likely to reflect the general overall trend of household sizes. One-third (35%) of Walla Walla County households, 7,904 households, are renters. Survey data suggests that this rate is higher among the farmworker population, whose migratory patterns and lower annual earnings (see Exhibit 123) are more compatible with rental housing. This may result in a mismatch of household size and housing stock for agricultural workers who rent and live with children or extended family members, further explored in Exhibit 118. Two- and three-bedroom units represent the majority of rental units available in Walla Walla County.

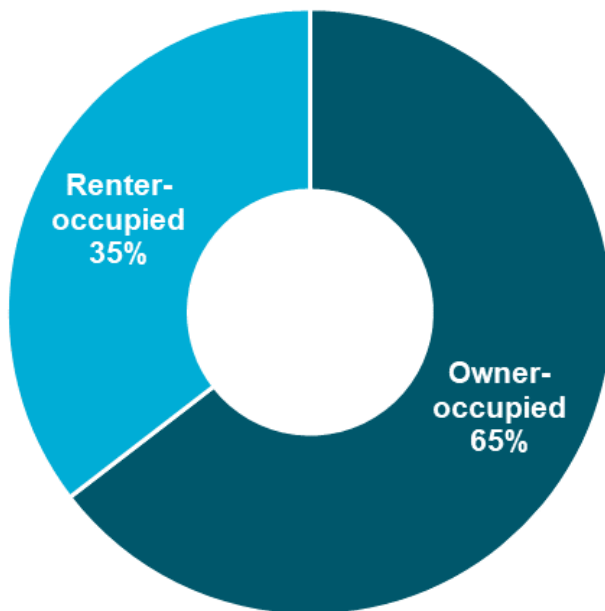
¹⁴⁶ American Community Survey, Table DP02 5-year Estimates, 2014-2018.

Exhibit 118: Walla Walla Household Sizes and Rental Housing Unit Size



Sources: American Community Survey S2501 5-Yr Estimates, 2010 & 2017; BERK, 2019

Exhibit 119: Walla Walla County Housing Tenure by Household, 2018



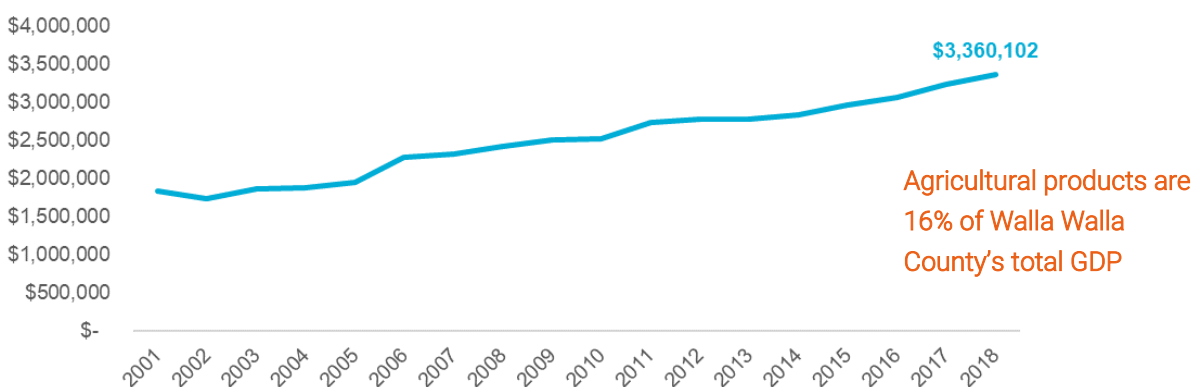
Sources: American Community Survey Table S2501 5-year Estimates, 2014-2018; BERK, 2020

County Economy

In Walla Walla County, covered farmworkers make up **8% of the labor force** and agricultural products comprise 16% of total GDP.

- Walla Walla County is one of two counties in ESD’s southeastern area. Workers there earn just less than the statewide average annual farmworker wages.
- Top employers for Walla Walla County include Broetje Orchards, Tyson Fresh Meats, Washington State Penitentiary and Providence St. Mary Medical Center.¹⁴⁷

Exhibit 120: Walla Walla County GDP, All Industries, 2001-2018



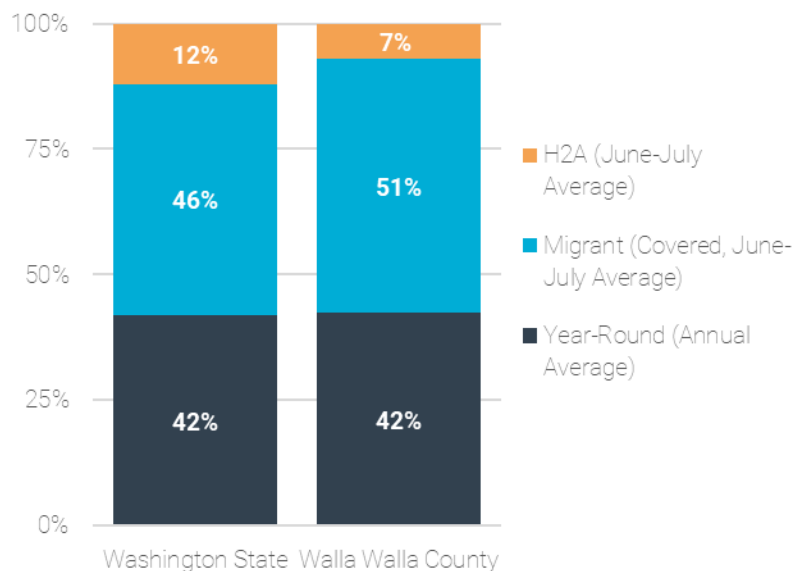
Sources: U.S. Bureau of Economic Analysis (BEA) SAGDP9N series, 2001-2018; BERK, 2020

Farmworker Population

As of 2018, Walla Walla County is home to an estimated **2,148 year-round and covered agricultural jobs**, which more than doubles during the peak months for migrant employment in June through October. Compared to statewide averages, Walla Walla County relies less upon H-2A workers and more on migrant, covered workers for its labor force.

¹⁴⁷ Walla Walla Comprehensive Plan, “Walla Walla County Comprehensive Plan,” (2019), [https://www.co.walla-walla.wa.us/document_center/commdev/planning/comp%20plan/FINAL%20Walla%20Walla%20County%20Comp%20Plan%20\(080519\)%20\(complete\).pdf](https://www.co.walla-walla.wa.us/document_center/commdev/planning/comp%20plan/FINAL%20Walla%20Walla%20County%20Comp%20Plan%20(080519)%20(complete).pdf)

Exhibit 121: 2018 Agricultural Employment by Type, County versus State Averages



Sources: Washington ESD, 2019; U.S. Department of Labor, 2020; BERK, 2020

Exhibit 122: Walla Walla County Farmworker Estimates, 2018

Employment Type	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Year-round	2,115	2,121	2,127	2,133	2,139	2,145	2,151	2,157	2,163	2,169	2,176	2,182
Migrant covered	416	644	941	878	1,026	2,274	2,847	2,651	2,540	2,171	1,737	466
Migrant H-2A*	0	0	67	300	361	361	361	128	61	0	0	0
Total estimated monthly employment	2,531	2,765	3,135	3,311	3,526	4,780	5,359	4,936	4,764	4,340	3,913	2,648

*Statewide requests provided by ESD and discounted 75% to reflect actual versus requested workers; County estimates based on Department of Labor percentages of worker requests by county

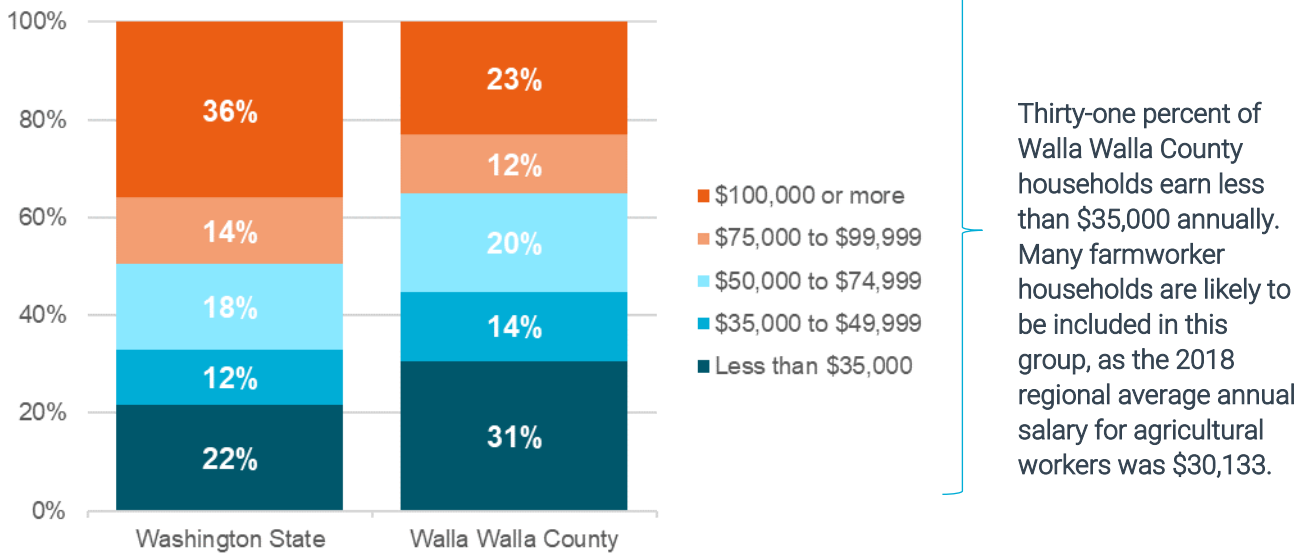
Sources: ESD, Employment Connections Division - Foreign Labor Certification Program; BERK, 2020

Income Summary

Walla Walla County households have lower incomes than state averages, with a higher percentage of households earning less than \$50,000 per year and a lower percentage of households earning greater than \$100,000 per year. Based on ESD income and wages reporting,

farmworker households are likely to earn less than \$35,000 per year without additional income from secondary employment or other household members. This income level is below the \$65,700 HUD-area median family income.

Exhibit 123: State and County Household Income Brackets



Sources: American Community Survey S1901 5-Yr Estimates, 2014- 2018; BERK, 2020

Estimated wages for farmworkers are below the median family income (MFI) for Walla Walla County at any family size. A household earning the regional average for farmworkers earns 46% of MFI in Walla Walla County, classified as very low-income (30-49% MFI) for households with three or more members and low-income (50-79% MFI) for single or two-person households.

- Median family income for Walla Walla County (2018 - HUD): \$65,700
- Average annual income for southeastern farmworkers (2018):¹⁴⁸ \$30,133

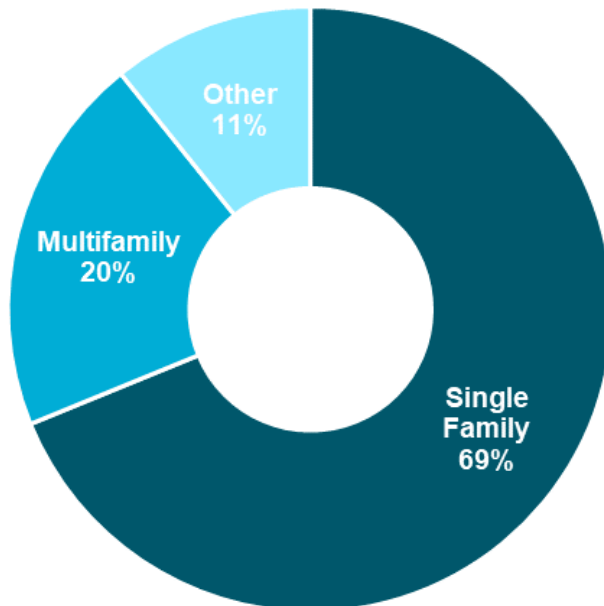
Housing Inventory

There are 24,849 housing units in Walla Walla County. This includes a mix of single-family, multifamily, and 'other' unit types, such as mobile homes. Given average farmworker wages in the region, an average one-bedroom rental unit is considered affordable, while the average two-

¹⁴⁸ 2018 average wages projected based on average annual growth rates over 5 years, as reported by ESD, 2019.

bedroom unit exceeds the affordability threshold. This may result in difficulty for larger household sizes to identify suitable rental accommodations. Vacancy rates for apartments in Walla Walla County are low, 0.2% compared to 4.3% statewide, indicating a competitive market for rental units. Homeownership is largely out of reach with farmworker wages – the estimated mortgage for average-priced homes results in a severe cost burden for these households. Less than 17% of homes for sale are priced at a range that might be affordable with farmworker wages.

Exhibit 124: Total Housing Units by Type, Walla Walla County 2018



Sources: Washington State OFM, 2018; BERK, 2020

Given the regional average annual wages for farmworkers, housing is considered affordable at rates of \$753 or less per month. However, housing prices in Walla Walla County have risen faster than regional farmworker incomes. Average home prices are up 49%, while wages have increased 19%. See Exhibit 125. This trend has intensified affordability issues.

Exhibit 125: Walla Walla County, Percent Change for Farmworker Wages versus Housing Prices, 2012-2018



Sources: Washington ESD, 2020; Washington Center for Real Estate Research, 2012 & 2018; BERK, 2021

Rental Housing

Average rents in Walla Walla County (2018):¹⁴⁹

- \$662 for one-bedrooms
- \$865 for two-bedrooms
- The rental vacancy rate is 0.2%

Home Ownership

The median price of a home in Walla Walla County is \$248,300.¹⁵⁰ For a farmworker household earning average annual wages, the estimated mortgage payment on this price of a home results in a **severe cost burden**. A more affordable home price on farmworker income is \$160,000 or less, assuming the ability to save for a \$32,000 (20%) down payment. Approximately 17% of Walla Walla County housing units are available in this price range.¹⁵¹ This down payment will be out of reach for many families, and as down payment size decreases, monthly mortgage payments increase.

¹⁴⁹ Washington Center for Real Estate Research, Apartment Market Survey, Fall 2018.

¹⁵⁰ Washington Center for Real Estate Research, Housing Market Summary, Q4 2018.

¹⁵¹ Ibid.

Whatcom County

Key Takeaways

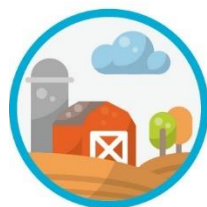


As many as **1,562** farmworker households search for housing through local, market rate options in Whatcom County.



Thirty-nine percent (39%) of this need is for migratory workers, who have more unique and potentially term-limited housing needs. This is complicated by the reality that there is a very low rental vacancy rate in Whatcom County, coupled with housing prices resulting in cost burden with farmworker wages.

In 2018, Whatcom County had...



1,315 year-round agricultural jobs.

Farmworker housing resources in the area offered housing units to 8% of this total.

Permanent Housing (units)

1,044 Estimated Workers
- 84 Provided Units

960 Estimated Gap



3,388 migratory jobs available during peak months.

Provided housing covers 65% of local workers. The remaining 602 compete for rental units along with year-round farmworker households and all other renter households in Whatcom County.

Seasonal Housing (beds)

1,764 Estimated Jobs
- 1,162 Provided Beds

602 Estimated Gap



Housing affordability is a challenge for farmworkers. Average annual wages for farmworkers are well below the median family income for all household sizes. Households with 3+ members would be considered very low-income by regional standards. The average home value results in severe cost burden for farmworker wages and very few rental or ownership units are within an affordable range.



It is likely that many farmworker households are renters. **There are very few rental units in the area that can accommodate families with 4+ people, a common household size in Whatcom County.** Farmworker families may struggle to secure adequate accommodation at an affordable rate

Introduction

Whatcom County is part of the western state reporting area. It borders Canada to the north, Skagit County to the south and Okanogan County to the east. Much of the eastern portion of the county is reserved as the North Cascades National Park. Interstate 5 and Highways 9, 542, 536, and 549 are the primary routes through the county, connecting many of the incorporated areas. There are 1,712 farms and more than 97,000 acres of agricultural lands, most prevalent across western parts of the county.¹⁵²

Whatcom County is Washington's sixth most productive county for agriculture, measured by the value of production, and is ranked 12th for year-round agricultural employment. Major commodities include milk, blueberries and raspberries.¹⁵³ Other major sectors of employment are government service, healthcare and social services, and retail.¹⁵⁴

The county population is 225,300. Bellingham is its largest population home, the county seat and home to 40% of the population.¹⁵⁵ There is also a large rural population, with 44% of residents living in unincorporated areas of Whatcom County.

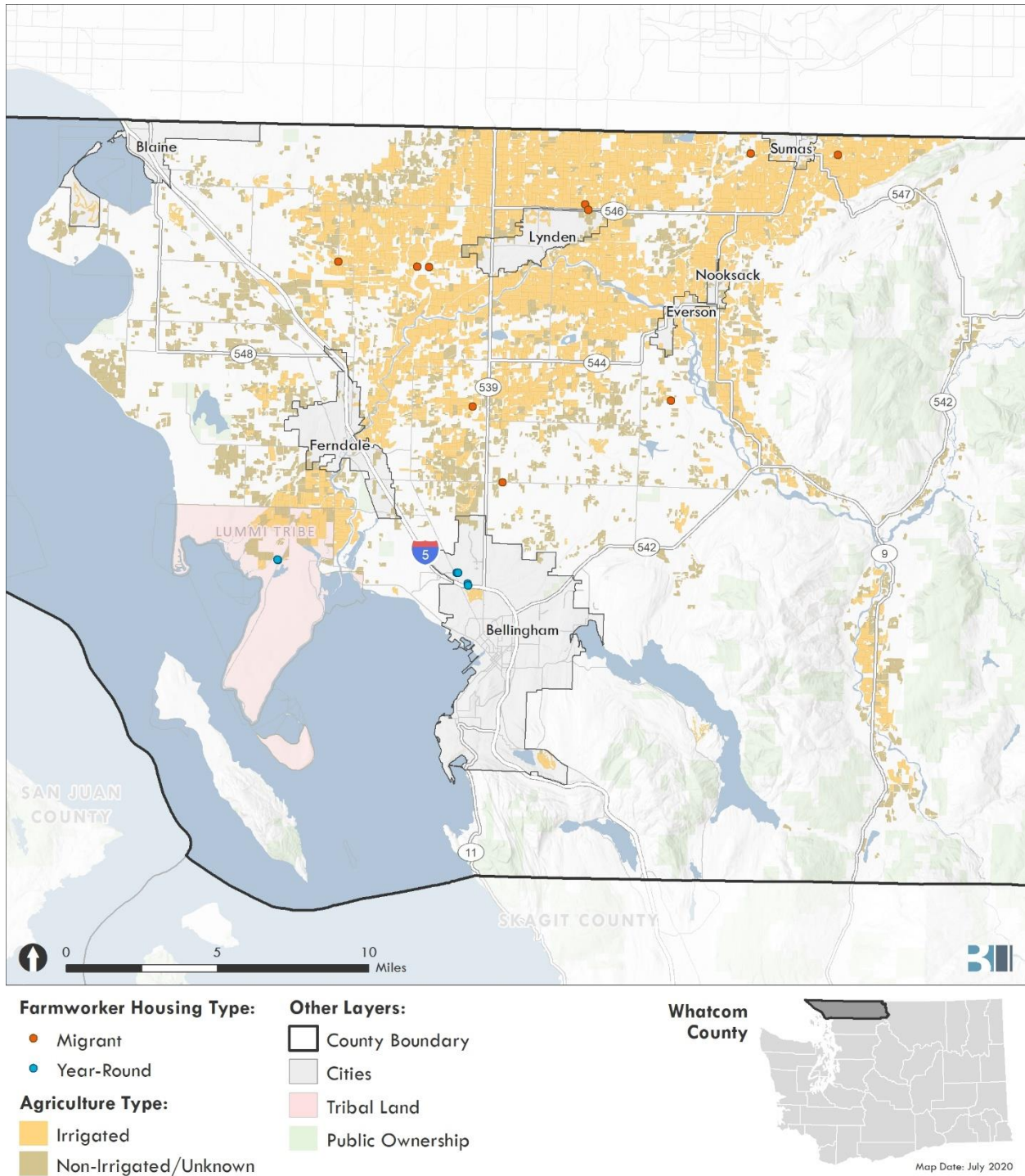
¹⁵² Washington State Department of Agriculture, "Washington Agriculture Snapshot," (October 2021).

¹⁵³ Washington State Department of Agriculture, 2012.

¹⁵⁴ Washington State Employment Security Department, Average annual employment by 2-digit NAICS codes, 2018.

¹⁵⁵ Office of Financial Management, 2019.

Exhibit 126: Whatcom County Agricultural Land and Farmworker Housing Units, 2019



Sources: Housing Data from Washington DOH, 2019; Washington State Housing Finance Commission, 2019; Office of Rural and Farmworker Housing, 2019; WSDA, 2019

Population Summary

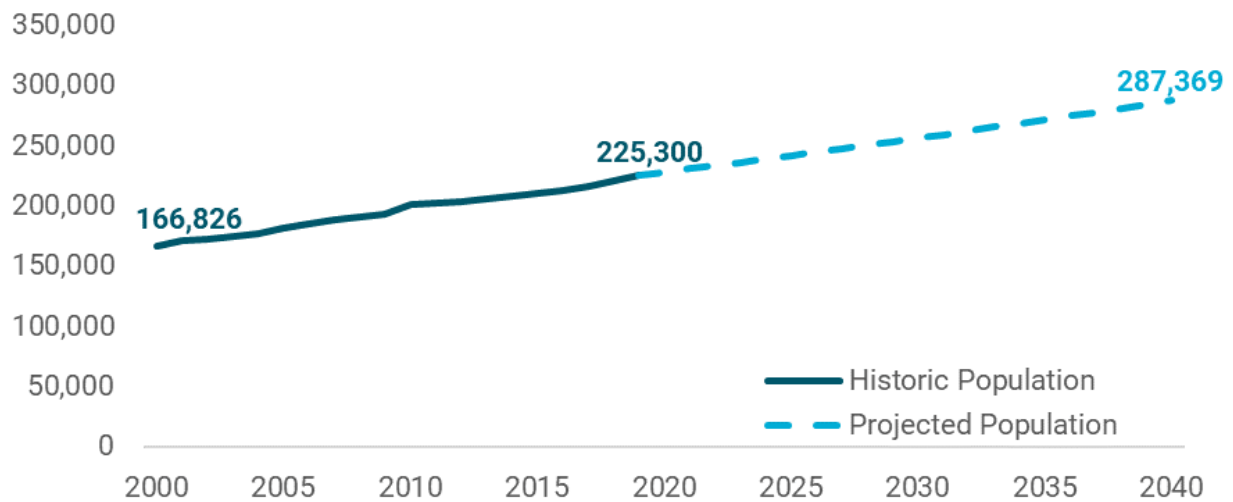
Whatcom County has experienced high rates of population growth over the past two decades. Today, it is home to a population of 225,300, which is a 35% increase from 2000 to 2019. Medium OFM population projections estimate continued, although slightly decelerated, growth patterns to 2040, as shown in Exhibit 139 and Exhibit 140. Demographic projections for Whatcom County estimate an increased proportion of older adults (65+) as the Baby Boomer generation ages. This is accompanied by slight proportional decreases across younger age cohorts in the county. The primary age group for farmworkers, 20-44, is predicted to decrease by 2% as a proportion of the population throughout this period.

Exhibit 127: Whatcom County Historical and Projected Growth Rates, 2000-2040

Average Annual Growth	2000-2019	2019-2040 Projected
Individuals	3,078	2,956
Percentage	1.8%	1.3%

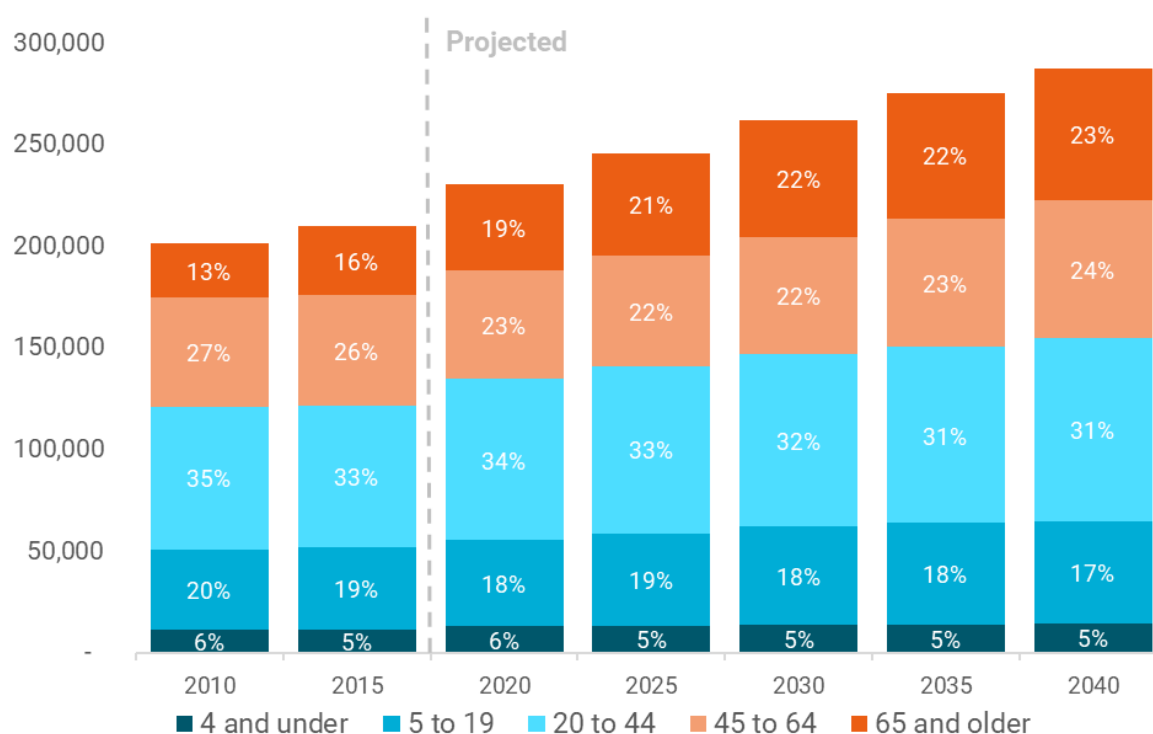
Sources: Washington State Office of Financial Management, 2019; BERK, 2020

Exhibit 128: Whatcom County Historical and Projected Population, 2000-2040



Sources: Washington OFM, 2019; BERK, 2019

Exhibit 129: Whatcom County Population by Age Cohort, Historical and Projected



Sources: Washington OFM, 2018; BERK, 2019

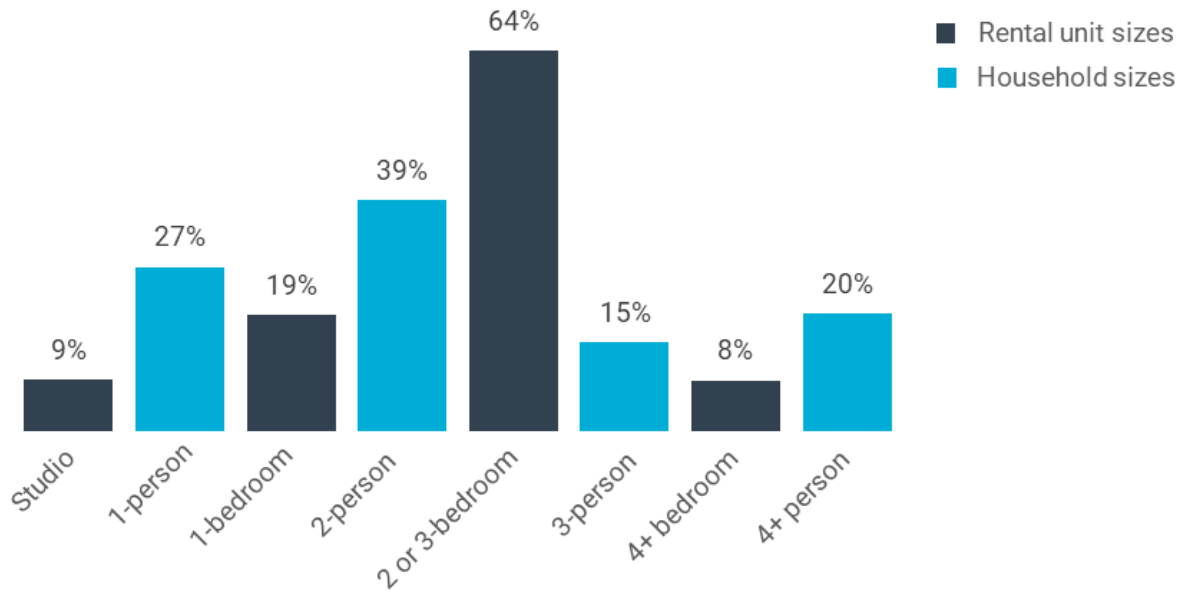
Household Population

The average household size in Whatcom County is 2.5 people.¹⁵⁶ Farmworker households are likely to reflect the general overall trend of household sizes. Almost 40% of Whatcom County households, or 32,293 households, are renters. Survey data suggests that this rate is higher among the farmworker population, whose migratory patterns and lower annual earnings (see Exhibit 135) are more compatible with rental housing. This may result in a mismatch of household size and housing stock for agricultural workers who rent and live with children or extended family members, further explored in Exhibit 130. Two- and three-bedroom units represent the majority of rental units available in Whatcom County. **However, 20% of the population has more than four people in the household and may need larger dwellings. Larger multifamily units with four or more bedrooms are limited in the rental market (in Whatcom County, only 8% of rental units are this size), increasing the likelihood of overcrowding and**

¹⁵⁶ American Community Survey, Table DP02 5-year Estimates, 2014-2018.

“bunking up” arrangements if households cannot afford to purchase a home.¹⁵⁷

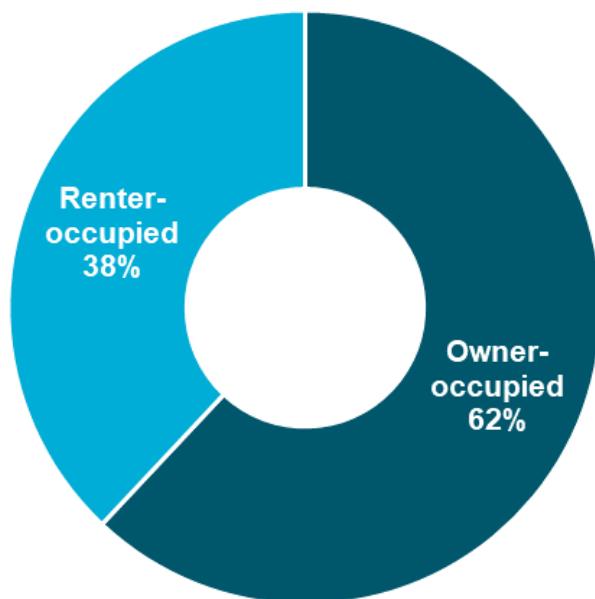
Exhibit 130: Whatcom County Household Size and Rental Unit Sizes



Sources: American Community Survey S2501 and S2504 5-Yr Estimates, 2014-2018; BERK, 2020

¹⁵⁷ American Community Survey, Table S2504 5-year Estimates, 2014-2018.

Exhibit 131: Whatcom County Housing Tenure by Household, 2018



Sources: American Community Survey Table S2501 5-year Estimates, 2014-2018

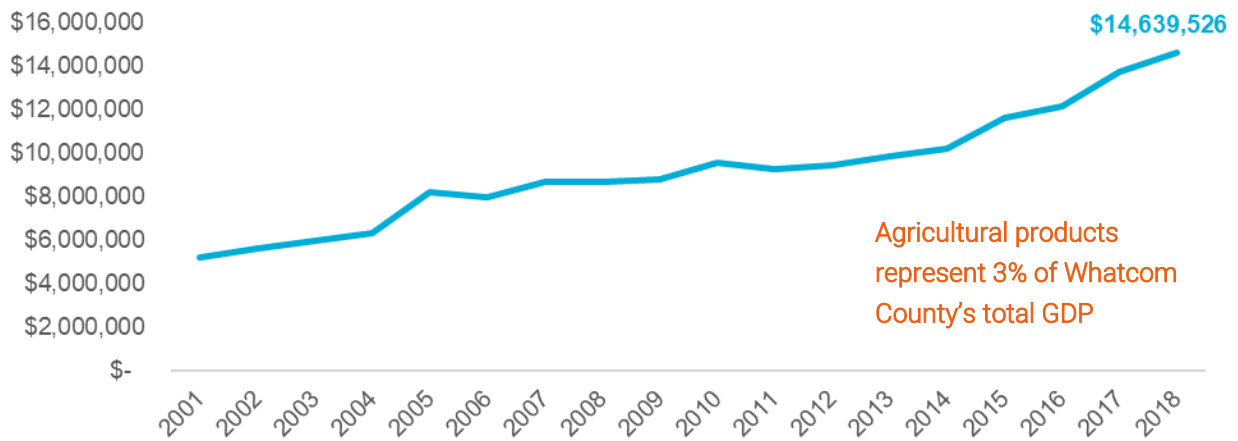
County Economy

In Whatcom County, covered farmworkers make up **1% of the labor force**, and agricultural production comprises 3% of total GDP. These are smaller proportions than many counties due to the overall population size and major institutions such as Western Washington University, which attracts many individuals and industries to the area.

- Whatcom County is one of 13 counties in ESD's western area, where farmworker earnings are slightly higher than the statewide annual average.
- Top employers for Whatcom County include St. Joseph Hospital, Lummi Nation, Western Washington University and Bellingham Public Schools.¹⁵⁸

¹⁵⁸ Western Washington University, Center of Economic and Business Research, "Whatcom County 2018 Top Employers," (2018), <https://cbe.wvu.edu/files/2018%20Whatcom%20County%20Top%20Employers.pdf>

Exhibit 132: Whatcom County GDP, All Industries

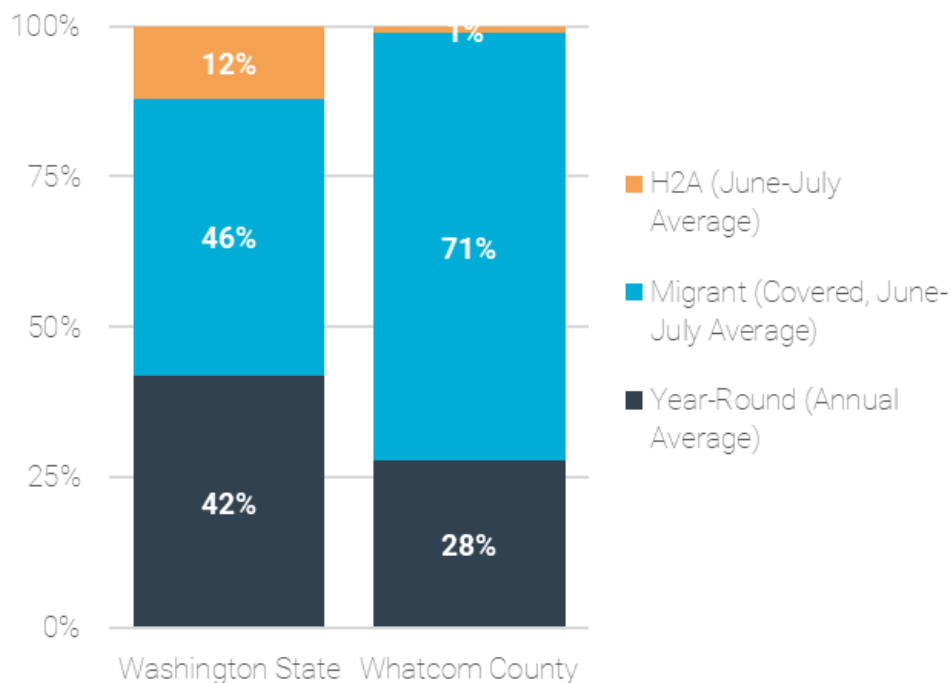


Sources: U.S. Bureau of Economic Analysis (BEA) SAGDP9N series, 2001-2018; BERK, 2020

Farmworker Population

As of 2018, Whatcom County is home to an estimated **1,315 year-round and covered agricultural jobs**, which more than triples during the peak months for migrant employment in June through August. Compared to statewide averages, Whatcom County relies heavily upon migrant, covered employment with very few H-2A workers. These workers are likely to struggle the most securing adequate housing.

Exhibit 133: 2018 Agricultural Employment by Type, County versus State Averages



Sources: Washington ESD, 2019; U.S. Department of Labor, 2020; BERK, 2020

Exhibit 134: Whatcom County Farmworker Estimates, 2018

Employment Type	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Year-round	1,414	1,398	1,381	1,363	1,345	1,326	1,307	1,288	1,268	1,249	1,229	1,210
Migrant covered	1,310	1,374	1,578	1,428	1,557	2,580	4,087	3,546	1,864	1,724	1,494	1,508
Migrant H-2A*	0	21	21	55	55	55	55	34	34	0	0	0
Total estimated monthly employment	2,724	2,793	2,980	2,846	2,957	3,961	5,449	4,868	3,166	2,973	2,723	2,718

*Statewide requests provided by ESD and discounted 75% to reflect actual versus requested workers; County estimates based on Department of Labor percentages of worker requests by county

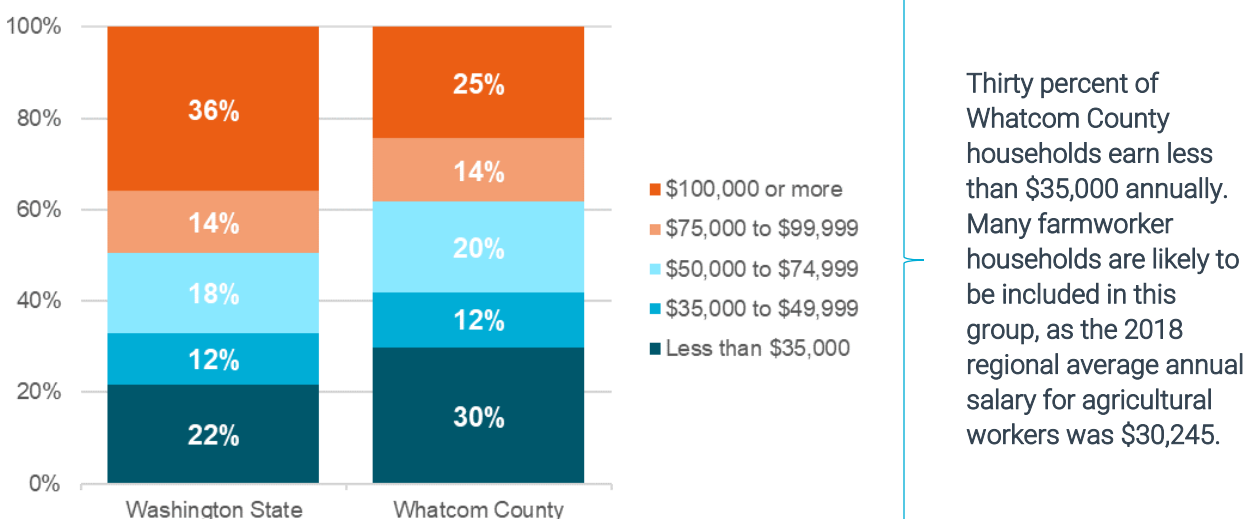
Sources: Employment Security Department, Employment Connections Division - Foreign Labor Certification Program; BERK, 2020

Income Summary

Whatcom County households have lower incomes than state averages, with a higher percentage

of households earning less than \$50,000 per year and a lower percentage of households earning greater than \$100,000 per year. Based on ESD income and wages reporting, farmworker households are likely to earn less than \$35,000 per year without additional income from secondary employment or other household members. This income level is below the HUD-area median family income for 2018, \$77,500.

Exhibit 135: Whatcom County, Household Income Brackets



Sources: American Community Survey S1901 5-Yr Estimates, 2014- 2018; BERK, 2020

Estimated wages for farmworkers are below the median family income (MFI) for Whatcom County, at any family size. A household earning the regional average for farmworkers earns 39% of MFI in Yakima County, classified as very low-income (30-49% MFI) for families with two or more members and low-income (50-79%) for singles.

- Median family income for Whatcom County (2018 - HUD): \$77,500
- Average annual income for western area farmworkers (2018):¹⁵⁹ \$30,245

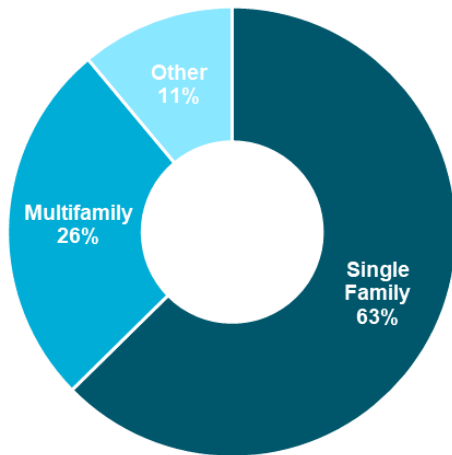
Housing Inventory

There are 97,674 housing units in Whatcom County. Affordability is a major hurdle with farmworker wages, both for rental and ownership housing. The average one-bedroom apartment

¹⁵⁹ 2018 average wages projected based on average annual growth rates over 5 years, as reported by ESD, 2019.

results in a cost burden with farmworker wages. Farmworkers with larger family sizes may struggle to secure housing of adequate size and quality. The rental vacancy rate is also low, 0.2%, indicating a tight and competitive market for rental housing. Homeownership for an average-priced house would result in a severe cost burden for farmworkers. About 10% of available units are in a more affordable price range.

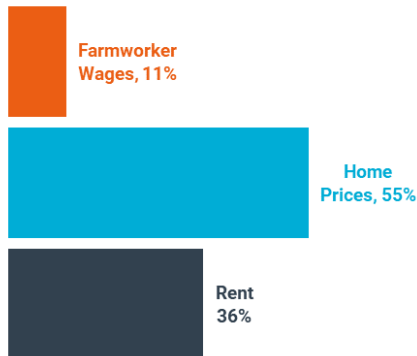
Exhibit 136: Total Housing Units by Type, Whatcom County, 2018



Sources: Washington OFM, 2018; BERK, 2020

In recent years, housing prices in Whatcom County have risen faster than regional farmworker incomes. The median home price is up 55%, while rent has increased 36%. Wages have increased 11%. See Exhibit 137. This trend has exacerbated affordability issues. **Given the regional average annual wages for farmworkers, housing is considered affordable \$756 or less per month. Given the regional average annual wages for farmworkers, housing is considered affordable at rates of \$753 or less per month.**

Exhibit 137: Whatcom County, Percent Change for Farmworker Wages versus Housing Prices, 2012-2018



Sources: Washington ESD, 2020; Washington Center for Real Estate Research, 2012 & 2018; BERK, 2021

Rental Housing

Average rents in Whatcom County (2018):¹⁶⁰

- \$939 for one-bedroom
- \$1,048 for two-bedroom
- The rental vacancy rate is 0.2%

Home Ownership

The median price of a home in Whatcom County is \$388,700.¹⁶¹ For a farmworker household earning annual average wages, the estimated mortgage payment on this price of a home results in a severe cost burden (82% of monthly income). A more affordable home price is \$160,000 or less, assuming the ability to save for a \$32,000 (20%) down payment. Approximately 10% of Whatcom County housing units are available in this price range. This down payment will be out of reach for many families, however, and as down payment size decreases, monthly mortgage payments increase.

¹⁶⁰ Washington Center for Real Estate Research, Apartment Market Survey, Fall 2018.

¹⁶¹ Ibid.

Yakima County

Key Takeaways



As many as **24,046** farmworker households search for housing through local, market rate options in Yakima County.



Thirty-six percent (36%) of this need is for migratory workers, who have more unique and potentially term-limited housing needs.

In 2018, Yakima County had...



20,630
year-round
agricultural jobs.

Farmworker housing resources in the area offered housing units to 6% of estimated workers.

Permanent
Housing (units)

16,373 Estimated Workers
– 948 Provided Units

15,425 Estimated Gap



23,701 migratory jobs
available during peak months.

Provided housing covers 22% of estimated local workers. The remaining 8,260 compete for rental units along with year-round farmworker households and all other renter households in Yakima County.

Seasonal
Housing (beds)

13,257 Estimated Workers
– 4,637 Provided Beds

8,260 Estimated Gap



Housing affordability is a challenge for farmworkers. Average annual wages for farmworkers are below the median family income for all household sizes and fewer than 15% of homes for purchase in Yakima County are affordable at this income level.

Lower income levels, affordability of housing stock, and job mobility make it likely that many farmworker households will compete for rental housing rather than ownership.



One- and two- bedroom rental units may be relatively affordable for farmworkers in Yakima County, however low vacancy rates indicate limited availability of units compared to market demand. Families with 3 or more members may struggle to find units of adequate size.

Introduction

Yakima County is part of the south-central state reporting area. It is very nearly in the center of the state, bordering Skamania, Lewis and Pierce counties to the west, Kittitas County to the north, Grant and Benton counties to the east and Klickitat County to the south. Yakima County borders or includes federal land (Mount Rainier National Park) to the northwest and the Columbia River to the east. The southern half of the county is Yakama Nation lands.¹⁶² There are 2,952 farms, most prevalent in central and eastern parts of the county.¹⁶³

Yakima County is Washington's top agricultural producer and employer. Major crops grown include apples, milk and hay. Other major sectors of employment are government services, healthcare and social assistance, and retail trade.

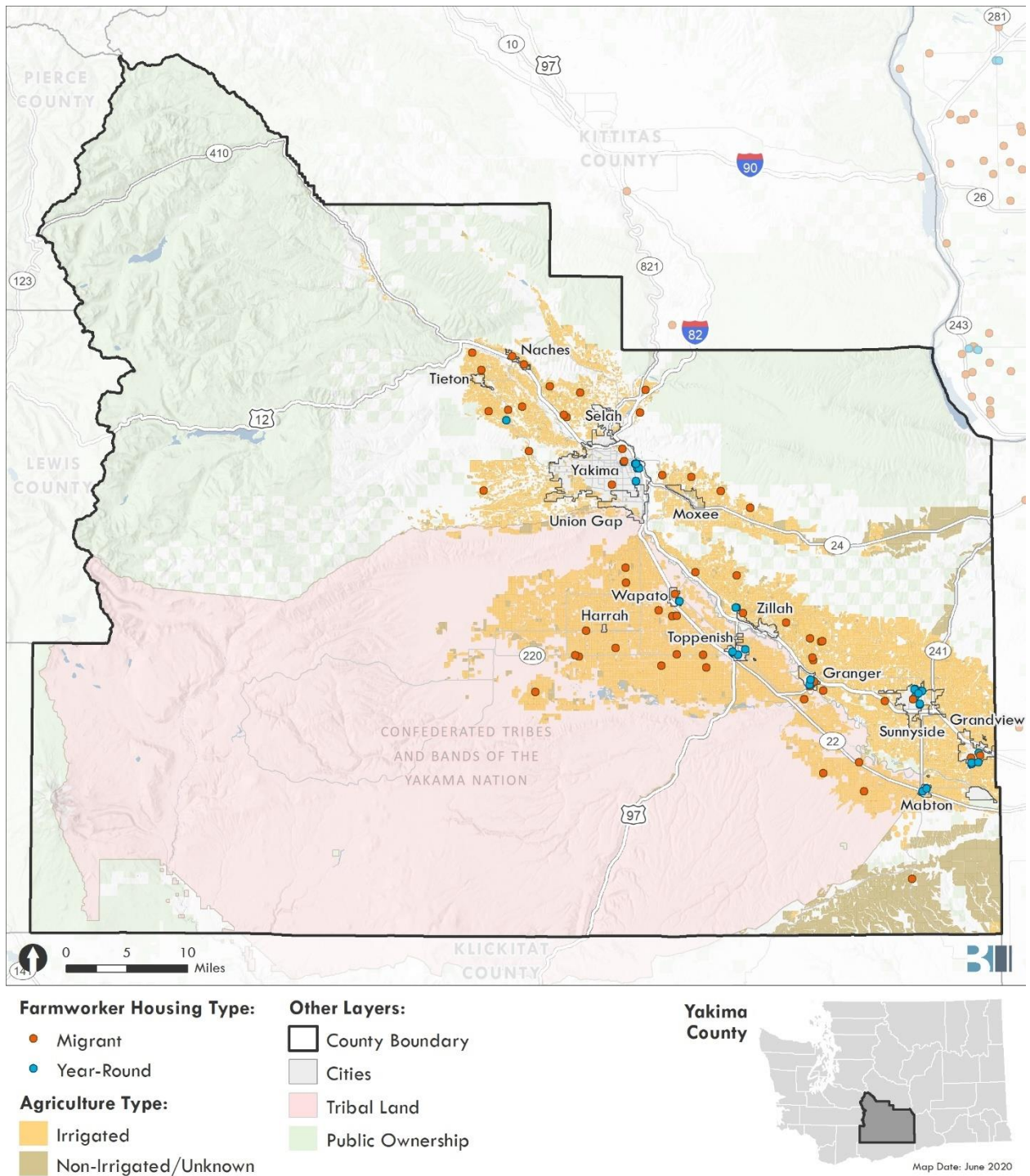
The City of Yakima is the county seat and home to 37% of the county's population.¹⁶⁴

¹⁶² Confederated Tribes and Bands of the Yakama Nation. <http://www.yakamanation.org/treaty.php>

¹⁶³ Washington State Department of Agriculture, 2017.

¹⁶⁴ Office of Financial Management, 2019.

Exhibit 138: Yakima County Agricultural Land and Farmworker Housing Units, 2019



Sources: Housing Data from Washington DOH, 2019; Washington State Housing Finance Commission, 2019; Office of Rural and Farmworker Housing, 2019; WSDA, 2019

Population Summary

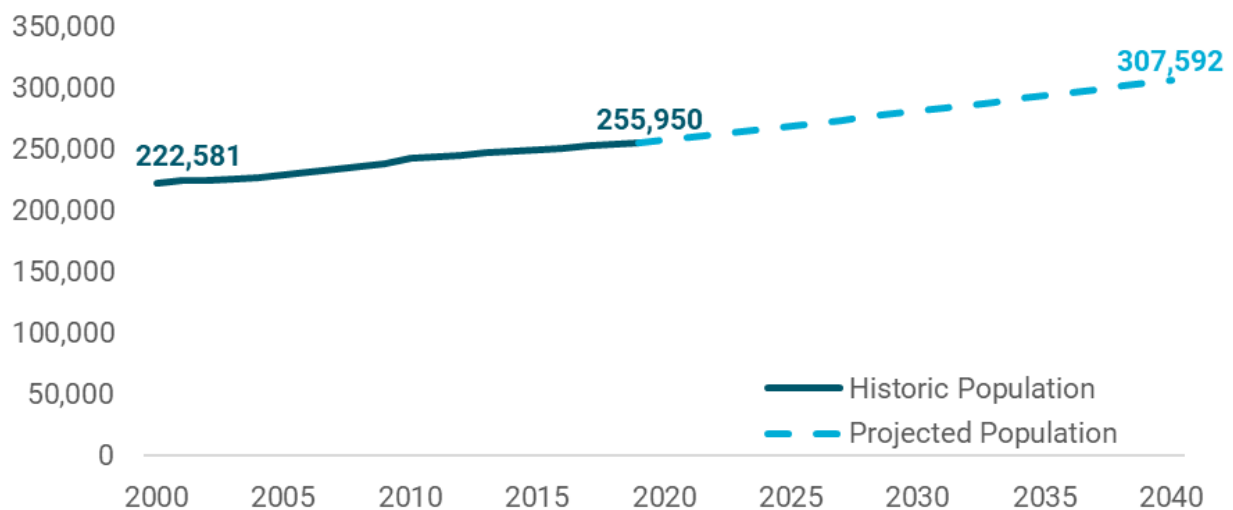
Yakima County has a population of 255,950, which is a 15% increase since 2000. Medium OFM population projections estimate accelerated growth patterns to 2040, as shown in Exhibit 139 and Exhibit 140. Growth projections for Yakima County estimate an increased proportion of adults over 65 and a decreased proportion of children under the age of four over the 2020-2040 period. This relates to longer life expectancies and lower birth rates. A higher proportion of the population at or above retirement age may represent higher demand for healthcare services, mobility assistance and ADA-compliant home design features. The primary age group for farmworkers, 20-44, is predicted to remain relatively stable as a proportion of the population throughout this period.

Exhibit 139: Yakima County Historical and Projected Growth Rates, 2000-2040

Average Annual Growth	2000-2019	2019-2040 Projected
Individuals	1,756	2,459
Percentage	0.8%	1.0%

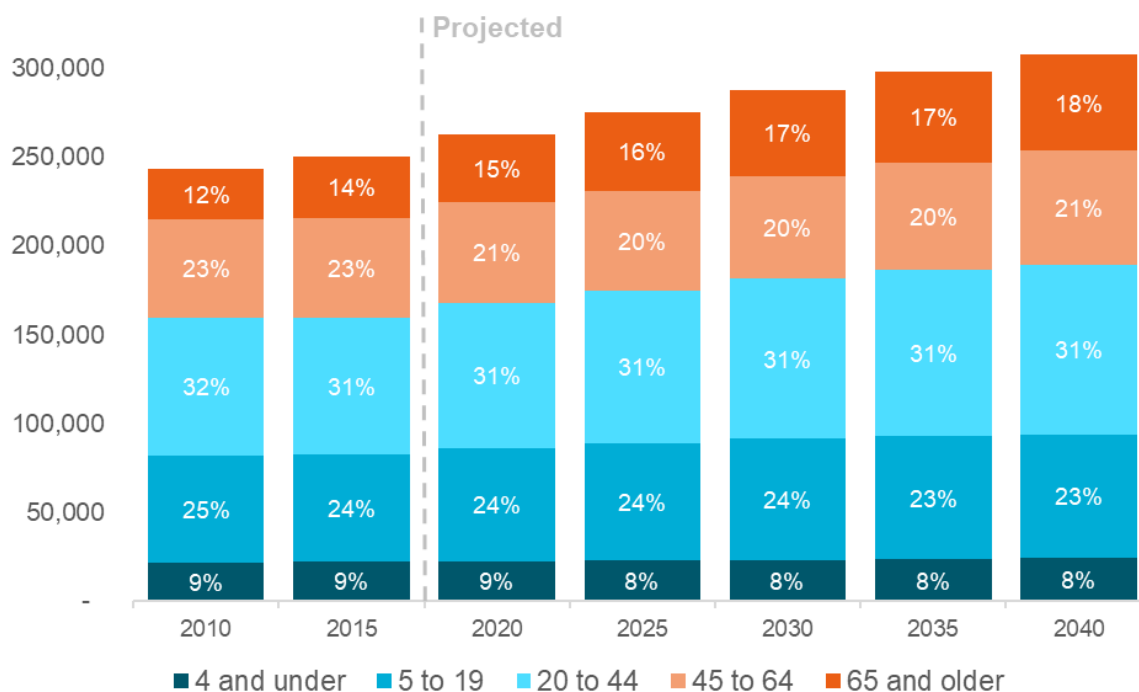
Sources: Washington State Office of Financial Management, 2019; BERK, 2020

Exhibit 140: Yakima County Historical and Projected Population, 2000-2040



Sources: Washington OFM, 2019; Yakima County Horizon 2040 Comprehensive Plan; BERK, 2019

Exhibit 141: Yakima County Population by Age Cohort, Historical and Projected



Sources: Washington OFM, 2018; BERK, 2019

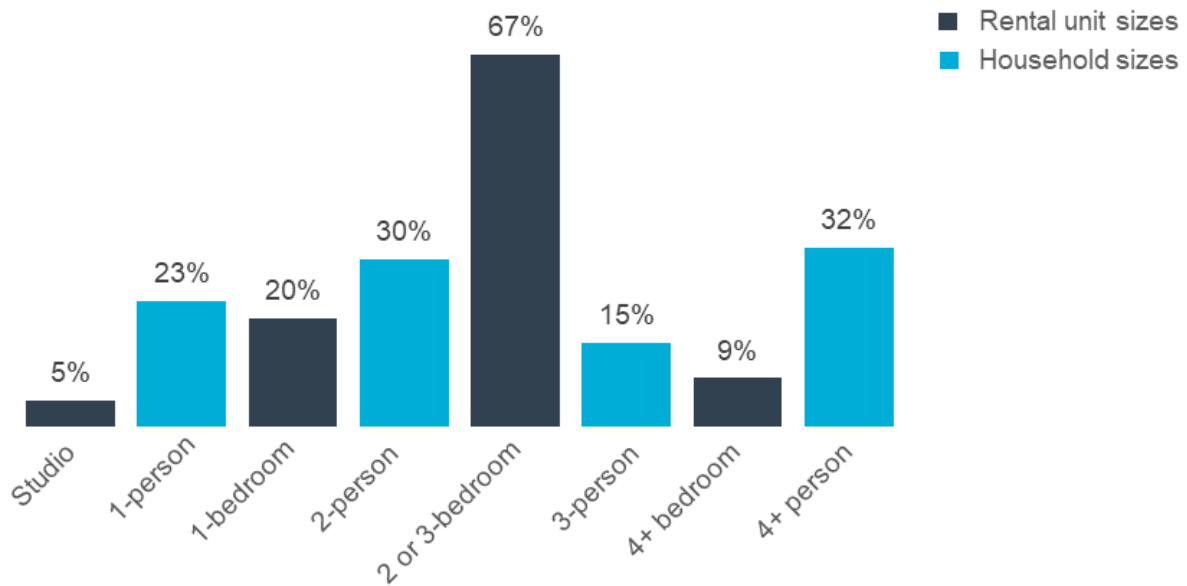
Household Population

The average household size in Yakima County is 3.0 people.¹⁶⁵ Farmworker households are likely to reflect the general overall trend of household sizes in Yakima County. Almost 40% of Yakima County households, or 30,299 households, are renters. Survey data suggests that this rate is higher among the farmworker population, whose migratory patterns and lower annual earnings (see Exhibit 111) are more compatible with rental housing. This may result in a mismatch of household size and housing stock for agricultural workers who rent and live with children or extended family members, further explored in Exhibit 22. One and two-person households may desire smaller housing types such as one- and two-bedroom apartments, representing most rental units available in Yakima County. **However, 32% of households have four or more people, who may need larger dwellings. Larger multifamily units with more than four bedrooms are limited in the rental market (in Yakima County, only 9% of rental units are this size), increasing the likelihood of overcrowding and “bunking up” arrangements if households cannot afford to**

¹⁶⁵ American Community Survey, Table DP02 5-year Estimates, 2014-2018.

purchase a home.¹⁶⁶

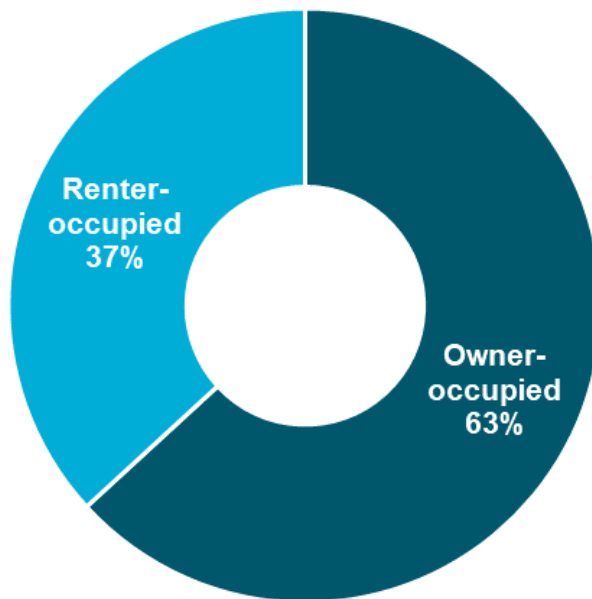
Exhibit 142: Yakima County Household Size and Number of Bedrooms in Rental Housing Units



Sources: American Community Survey S2501 and S2504 5-Yr Estimates, 2014-2018; BERK, 2020

¹⁶⁶ American Community Survey, Table S2504 5-year Estimates, 2014-2018.

Exhibit 143: Yakima County Housing Tenure by Household, 2018



Sources: American Community Survey Table S2501 5-year Estimates, 2014-2018

County Economy

Agriculture is a major component of Yakima County's economy. Yakima County is Washington's top county for agriculture, measured by the value of annual production, number of employees and number of farms. Apples, milk and hay are three of the largest commodities farmed in the county.¹⁶⁷ Agriculture accounts for 20% of the county's GDP and 17% of its labor force.¹⁶⁸

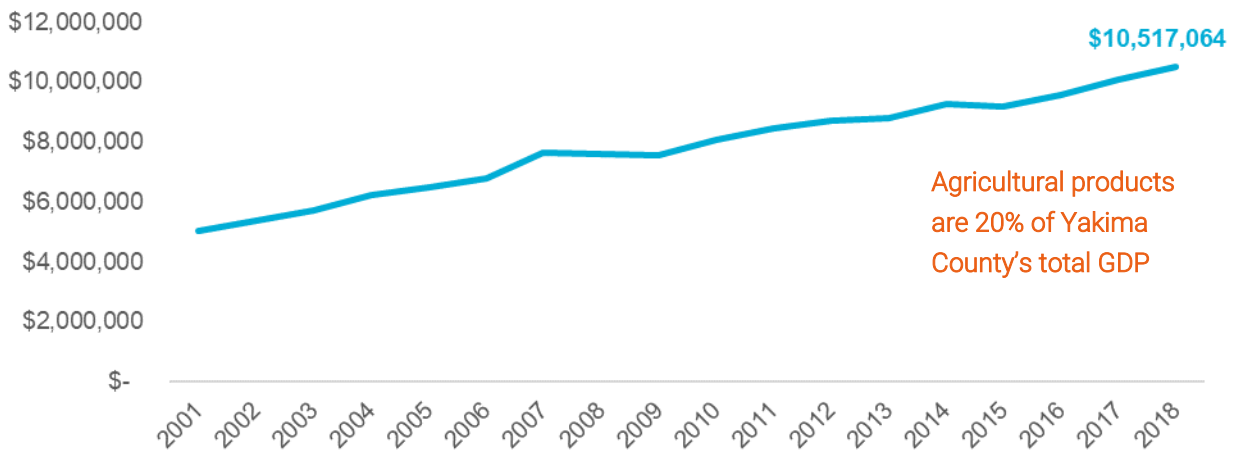
- Yakima County is one of two counties in ESD's south-central area, with the highest estimate for average annual farmworker wages.
- Top employers include Virginia Mason Memorial Hospital, Yakima School District, Walmart, Borton Fruit and Yakima County government.¹⁶⁹

¹⁶⁷ Washington State Department of Agriculture, 2012.

¹⁶⁸ Agricultural Product Value from USDA, 2017; GDP from U.S. Bureau of Economic Analysis (BEA), 2017; Labor Force figures from Washington ESD, 2018.

¹⁶⁹ Yakima County Horizon 2040 Comprehensive Plan.

Exhibit 144: Yakima County GDP, All Industries

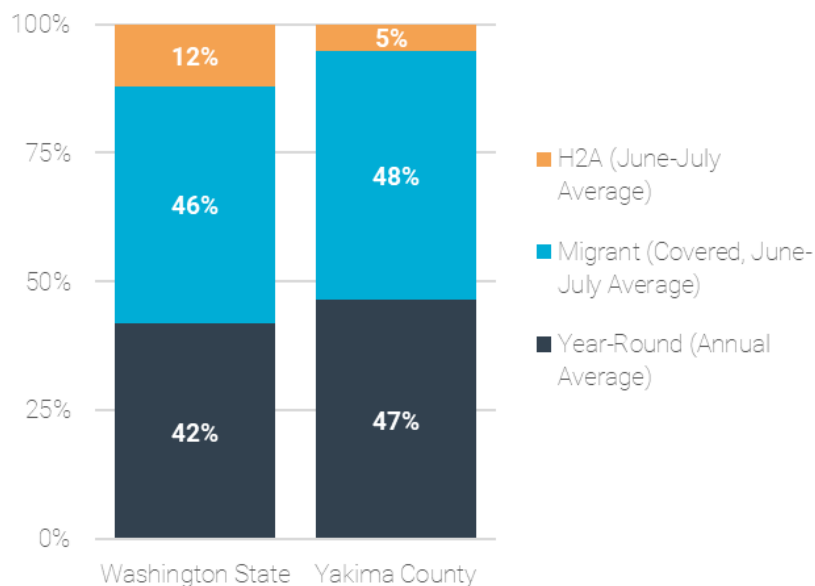


Sources: U.S. Bureau of Economic Analysis (BEA) SAGDP9N series, 2001-2018; BERK, 2020

Farmworker Population

As of 2018, Yakima County is home to an estimated **20,630 year-round and covered agricultural jobs**, which more than doubles during the peak months for migrant employment. Compared to statewide averages, Yakima County relies more upon covered migrant employment rather than H-2A workers. This is likely due to its increased agricultural production. Given the additional housing challenges faced by migrant workers, this indicates a need for housing assistance among the county’s agricultural labor force.

Exhibit 145: 2018 Agricultural Employment by Type, County versus State Averages



Sources: Washington ESD, 2019; U.S. Department of Labor, 2020; BERK, 2020

Exhibit 146: Yakima County Farmworker Estimates by Employment Type, 2018

Employment Type	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Year-round covered	20,318	20,374	20,431	20,488	20,545	20,602	20,658	20,715	20,772	20,829	20,886	20,943
Migrant covered	2,858	5,910	7,700	10,654	10,519	22,282	20,593	17,932	19,032	15,527	3,496	2,434
Migrant H-2A*	869	1,026	1,452	1,750	1,790	2,453	2,075	1,675	1,009	474	30	0
Total monthly employment	24,045	27,310	29,583	32,892	32,854	45,337	43,326	40,322	40,813	36,830	24,412	23,377

*Statewide requests provided by ESD and discounted 75% to reflect actual versus requested workers; County estimates based on Department of Labor percentages of worker requests by county

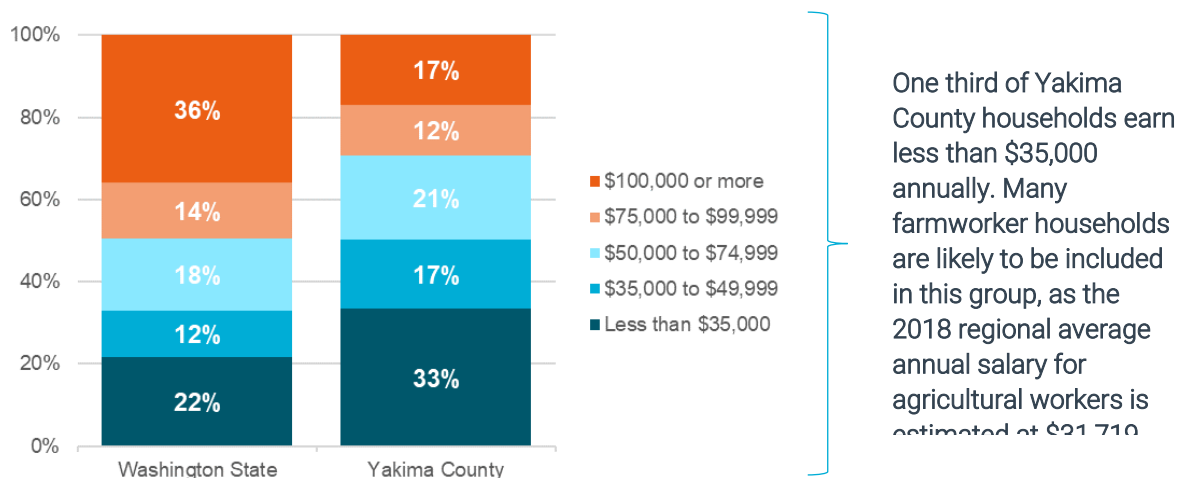
Sources: Employment Security Department, Employment Connections Division - Foreign Labor Certification Program; BERK, 2020

Income Summary

Yakima County households have lower incomes than state averages, with a higher percentage of households earning less than \$50,000 per year and a lower percentage of households earning

greater than \$100,000 per year. Based on ESD income and wages reporting, farmworker households are likely to earn less than \$35,000 per year without additional income from secondary employment or other household members. This income level is below the HUD-area median family income for 2018: \$54,700.

Exhibit 147: Yakima County, Household Income Brackets



Sources: American Community Survey S1901 5-Yr Estimates, 2014- 2018; BERK, 2020

Estimated wages for farmworkers are below the median family income (MFI) for Yakima County at any family size. A single-person household earning the regional farmworker average wage earns 58% of MFI in Yakima County and is classified as low-income (50-79% MFI).

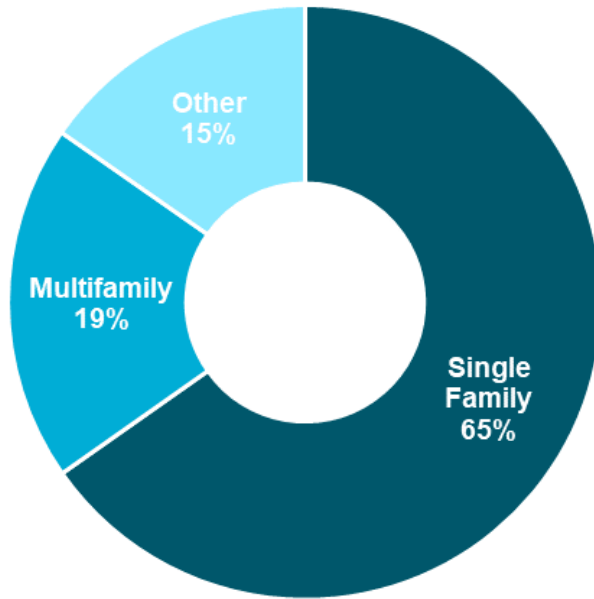
- Median family income for Yakima County (2018 - HUD): \$54,700
- Average annual income for south-central farmworkers (2018):¹⁷⁰ \$31,719

Housing Inventory

There are 89,815 housing units in Yakima County. Fifteen percent of these are classified as 'other,' including mobile homes and other special housing types, compared to a statewide average of 8%. This high percentage may correlate to the high number of farmworkers living in temporary housing types.

¹⁷⁰ 2018 average wages projected based on average annual growth rates over 5 years, as reported by ESD, 2019.

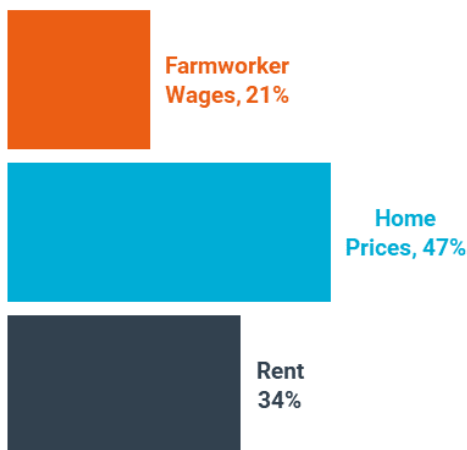
Exhibit 148: Total Housing Units by Type, Yakima County 2018



Sources: Washington OFM, 2018; BERK, 2020

In recent years, housing prices in Yakima County have risen faster than regional farmworker incomes. Median home prices have risen 47%, while rent has increased 34%. Wages have increased 21%. See Exhibit 149. This trend has intensified affordability issues. **Given the regional average annual wages for farmworkers, housing is considered affordable at rates of \$793 per month or less.**

Exhibit 149: Yakima County, Percent Change for Farmworker Wages versus Housing Prices, 2012-2018



Sources: Washington ESD, 2020; Washington Center for Real Estate Research, 2012 & 2018; BERK, 2021

Rental Housing

There are an estimated 30,299 renter-occupied housing units in Yakima County¹⁷¹ and 948 units specifically available to farmworker households. The average rent in Yakima County is \$660 per month for one-bedroom units and \$830 per month for two-bedroom units.¹⁷² These units are considered affordable for households earning \$26,400 and \$33,200, respectively. The rental vacancy rate is 1.4%, indicating a lack of available rental units. This suggests that while some rental units are affordable for farmworker wages, competition is tight. Renters who can prove higher earnings or who are willing to sign longer-term leases may be more attractive to property owners.

Exhibit 150: Monthly Rent as a Percentage of Average Farmworker Wages, Yakima County, 2018

Unit Size	Average Monthly Rent	Percentage of Average Farmworker Monthly Wages
1-bedroom	\$660	25%
2-bedroom	\$830	31%

Sources: Washington Center for Real Estate Research, Fall 2018 Apartment Market Survey; ESD, 2019; BERK, 2020

Farmworker wages and incomes are low, but the reported rental rates for Yakima County indicate that market-rate one-bedroom and two-bedroom apartments may be affordable for workers earning average annual wages. Two-bedroom apartments just cross the threshold of cost burden for these workers. Larger units that accommodate larger household sizes are likely unaffordable for farmworker households. Competition for rental units of any size may prevent lower-earning households or migratory workers from securing stable housing.

Home Ownership

The median price of a home in Yakima County is \$227,800.¹⁷³ For a farmworker household earning annual average wages, the estimated mortgage payment on this price of a home results in a severe cost burden. A more affordable home price is \$160,000 or less, assuming the ability to

¹⁷¹ American Community Survey, S2501 5-Yr Estimates, 2014-2018.

¹⁷² Washington Center for Real Estate Research, Apartment Market Survey, Fall 2018.

¹⁷³ Ibid.

pay a \$32,000 (20%) down payment. About 15% of Yakima County housing units are available in this price range. This down payment will be out of reach for many families, and as down payment size decreases, monthly mortgage payments increase.

Stakeholder Engagement

Farmworkers

Farmworker Tribunal

BERK attended the seventh Annual Farmworker Tribunal in Olympia on Feb. 10, 2020, during which farmworkers delivered testimony to tribunal judges in culturally appropriate ways, such as through stories and in their preferred languages. Farmworkers described issues including generational poverty, fear of employer retaliation, health concerns about pesticides and housing locations, and concerns around schooling and the care of children. These issues and lived experience intersect with housing needs and informed this study's policy recommendations and gap analysis.

COVID-19 Farmworker Study (COFS)

COFS is a collaborative tristate research project coordinated by the California Institute for Rural Studies (CIRS) to provide a rapid response analysis of the impact of COVID-19 on farmworker communities along the West Coast. The Washington COFS data collection team collected surveys of farmworkers throughout the state in the fall of 2020. Promotoras (community health workers) surveyed farmworker participants from farmworker-serving community-based organizations that are part of the project's data team.

Housing Providers and Other Stakeholders¹⁷⁴

Stakeholders from nonprofit organizations and housing authorities that build, own and operate farmworker housing provided input on the major needs for permanent and temporary farmworker housing. Stakeholders cited the following items as major areas of concern in farmworker housing:

- **Housing affordability.** Statewide housing affordability issues are affecting the ability of

¹⁷⁴ Sources: Interview with Lowel J. Krueger, Executive Director, Yakima Housing Authority, (Feb. 27, 2020); Interview with Dan Fazio, Executive Director, Wafla, (Feb. 27, 2020); Interview with Melony Rosen, Executive Director, Yakima Habitat for Humanity, (March 10, 2020); Interview with Bryan Ketcham, Director, Catholic Charities Housing Services, (March ,17 2020).

farmworkers to secure rental housing. Since farmworkers tend to have lower incomes, issues of low rental housing inventory and low vacancy rates contribute to farmworkers struggling to find rental properties and facing higher costs when they find units.

- **Barriers to homeownership.** More than half of farmworkers in Washington indicate that they would like to own a home but face barriers.¹⁷⁵ Staff at one nonprofit focused on increasing access to homeownership highlighted the low inventory of lower-priced homes in the Washington real estate market. Very few homes affordable to first-time buyers come onto the market, and those that do sell quickly. Farmworkers are also more likely to be immigrants and speak a language other than English, which can disadvantage them in the home buying process. One stakeholder said that some factors in the home buying process in the U.S., such as the importance of a credit score and how to build credit, might not be familiar to some farmworkers. This compounds with language barriers to make the process more challenging.
- **Lack of temporary housing options.** Staff at an organization that develops farmworker housing talked about the challenges around temporary housing development. Private developers rarely build temporary housing for migrant workers because such developments are not a good investment – migrant workers typically earn less than year-round workers and have less income for housing.
- **Poor conditions in temporary housing facilities.** Several stakeholders noted concerns with conditions in some existing temporary housing facilities. For example, they described overcrowding, pests and fire hazards as challenges in tents, shared homes and other makeshift congregate housing.
- **State and local regulations that impede the development of housing.** One stakeholder shared that current state regulations make it challenging for nonprofits to operate temporary housing – some programs provide funding specifically for farmworker housing, but nonprofits are challenged when some farmworkers take on non-farm work in certain seasons of the year. Another regulation requires facility managers to reserve a certain percentage of beds for walk-ins, but there is no agreement about who qualifies as a walk-in.

Local regulations can make developing permanent farmworker housing challenging, as well – it is easier to construct affordable housing as multi-family units, but local jurisdictions, particularly in rural areas, may not have zoning that allows for this construction.

¹⁷⁵ Washington State Farmworker Housing Trust, “2006 Farmworkers Survey” (May 2007).

Employers

Employers of farmworkers described current trends in farmworker employment and housing and the current challenges in securing adequate housing.¹⁷⁶ Trends they described include:

- **Increased usage of H-2A visa workers and challenges with the program design.** Changes in immigration policy and enforcement have contributed to shortages of migrant workers. Several employers noted an increase in the hiring of H-2A visa workers in response. Several growers stated that they would like to hire H-2A visa workers because of the stability that such workers provide but were unable to do so because of the higher associated costs, including housing. Employers must provide housing to H-2A visa workers at cost, so building and operating housing becomes part of the expense of hiring H-2A workers.
- **Increased costs of providing housing due to state and federal regulations.** One stakeholder cited changing state and federal standards for farmworker housing as contributing to the decline of employer-provided housing. Though the intention was to improve housing conditions, the H-2A regulations combined with local land use and building regulations made it more costly for farmers to provide housing for their workers, and many stopped doing so altogether. Several employers cited specific building regulations — such as minimum window size and the required usage of screen doors — and Growth Management Act limitations on the location of urban and rural development and the cost to address rural water supplies as contributors to higher costs. In addition, because migrant workers provide labor to employers for limited periods, housing may sit empty for most of the year.
- **Farmworkers traveling longer distances to go to work.** One employer in Western Washington explained that the high costs of providing on-farm housing and the lack of private market housing near farms mean that many workers live far from where they work and travel long distances to work, with commutes that sometimes take several hours per day. The employer shared that they would like to provide on-site housing to attract workers and allow for a more stable workforce, but the costs to build and maintain that housing was prohibitive.

¹⁷⁶ Sources: Interview with April Clayton, Red Apple Farms, (June 22, 2020); Interview with Jon Devaney, Washington State Tree Fruit Association, (June 23, 2020); Interview with Rosella Mosby, Mosby Farms, (July 7, 2020); Interview with Josh Koempel, Rock Island Farm, (July, 9 2020); Interview with Dan Fazio, Executive Director, Wafla, (Feb. 27, 2020).

Summary & Recommendations

Housing Access and Affordability

Across the state, farmworkers struggle to access and afford housing that suits the unique needs of their work.

Statewide, an estimated 48,500 farmworkers must seek permanent housing in the private market, and up to 21,000 migrant farmworkers must secure temporary beds in the private market. The largest gaps between available farmworker housing units and need are in Chelan and Yakima counties. Between the two counties, an estimated 20,650 farmworkers seek permanent housing and 12,000 must find temporary housing on the private market. Benton and Franklin counties also have notably low proportions of provided housing units compared to worker counts.

Exhibit 151: Housing Availability Highlights

County	Ratio of Year-round Workers to Farmworker-specific Housing Units	Year-round Farmworkers Looking in the Local Market	Ratio of Migratory Workers to Farmworker-specific Housing Units	Migratory Farmworkers Looking in the Local Market
Adams	8%	990	45%	712
Benton	3%	2,754	14%	2,716
Chelan	3%	5,222	35%	3,305
Douglas	2%	1,202	97%	70
Franklin	6%	2,204	14%	2,936
Grant	11%	3,889	89%	437
Okanogan	5%	1,475	93%	170
Skagit	17%	1,138	66%	238
Walla Walla	3%	1,646	0%	1,313
Whatcom	8%	960	65%	602
Yakima	6%	15,425	22%	8,620

Sources: Covered employment estimates from Washington ESD, 2018. Farmworker housing counts from Washington State Housing Finance Commission, 2019; Department of Health, 2019; and Office of Rural and Farmworker Housing, 2020. BERK, 2020.

Challenges for farmworkers seeking rental housing on the private market include lack of options due to low rental inventory, lack of units affordable to individuals earning typical farmworker wages, and lack of rental units large enough to accommodate farmworker households. Farmworker wages are lower than median incomes across Washington. Lack of affordable housing for farmworkers is most acute in Chelan and Douglas counties, where a two-bedroom apartment costs two-thirds of the average farmworker's wages. See Exhibit 152.

Exhibit 152: Housing Affordability Highlights

County	Farmworker Wages as a Percentage of HUD-area MFI	Percent of Income Spent to Afford Average Apartment*
Adams	57%	n/a
Benton	41%	36%
Chelan	40%	66%
Douglas	40%	66%
Franklin	41%	36%
Grant	50%	n/a
Okanogan	52%	n/a
Skagit	44%	39%
Walla Walla	46%	34%
Whatcom	39%	42%
Yakima	58%	31%

*Based on average monthly wages by region and countywide average rental rates for a 2-bedroom apartment. HUD considers households cost-burdened when 30% or more of income goes toward housing.

Sources: Covered employment wage estimates from Washington ESD, 2018. HUD-area MFI estimates as provided by Washington State Housing Finance Commission, 2020. Average rents and vacancy rates as reported by Washington Center for Real Estate Research, 2018. BERK, 2020.

The greatest need for farmworker housing is temporary housing for non-H-2A migrant workers. These workers need flexible, temporary housing, which is not available in the private market; thus, they are more likely to live in unsheltered, unsafe or unhealthy housing situations.

Farmworker Preferences and Housing Situations

Farmworkers have a variety of housing preferences. Year-round workers who live in and around agricultural areas often prefer to be in a central location and look for work on different farms. Many of these workers have families and would prefer to be close to amenities such as schools, churches and other employers. Temporary migrant workers often prefer a shorter commute and housing close to their worksites. While housing conditions and preferences vary among farmworkers, studies have shown that a significant proportion of farmworkers report problems with their housing conditions. This reflects the tradeoffs farmworkers make when faced with a lack of affordable housing. According to a 2008 survey of farmworkers,¹⁷⁷ more than one-third (36%) cited problems with their current housing conditions. Thirty-two percent reported living in overcrowded units, 27% reported living in units with peeling or chipping paint, 23% reported living in units with mice, and 18% reported living in units with one or more appliances that did not work. In 2020, many farmworkers lived far from their place of work, in areas with more affordable housing, which resulted in long commutes.

Housing situations also vary by duration of work. There are substantial differences between the housing situations for local and non-local, non-H-2A migrant workers, many of whom are undocumented immigrants from Mexico and other countries. These migrant workers are more likely to be in substandard housing than local workers or H-2A workers. Migrant workers are also more likely to lack indoor shelter and to experience homelessness. According to a 2019 report, 6% of farmworkers reported living outdoors, such as in a shed or car. For non-local migrant workers, this proportion nearly tripled to 15%.

Federal law requires employers of H-2A visa workers to provide housing for their H-2A employees at no cost.¹⁷⁸ This includes the option to provide housing directly or to secure and pay for the use of public housing units. However, H-2A workers represent only about 12% of all farmworkers in Washington (see Statewide Demographic Information on Farmworkers on pages 21-22), so this does not apply to most of the state's farmworkers.

Challenges in Accessing Housing

Given their demographics and the nature of their work, farmworkers face unique challenges in accessing housing:

¹⁷⁷ Washington State Farmworker Housing Trust, "A Sustainable Bounty: Investing in our Agricultural Future," (2008).

¹⁷⁸ [20 CFR 655.122\(d\)\(1\)](#)

- Wages for farmworkers are low. Across the state, farmworker wages range from 40-60% of HUD-area median family income estimates. Thus, wages are a limiting factor for farmworkers looking to access market-rate housing or become a homeowner.
- Many farmworkers face barriers, including inadequate funds for deposits, discrimination and inappropriately long leases for seasonal work. There are additional challenges in acquiring a rental lease for the high proportion of farmworkers who are not English proficient.

Recommendations

Funding Recommendations

- **Evaluate increasing or restructuring funding for farmworker housing through the state Housing Trust Fund (HTF).** The HTF is a key resource for farmworker housing funding. Though the level of funding for farmworker housing has remained largely the same since 1999, the total number of units and beds produced with those funds is lower in the last six years than in the program's first six years. From 1999-2004, the program supported the production of 1,015 permanent units and 4,054 seasonal beds. From 2014-2019, the HTF supported the production of 623 permanent units and 1,086 seasonal beds.

This reduction is likely due to:

- A focus on permanent housing, which is more expensive to produce per unit than temporary housing is per bed. Thirty-six percent of the production in 2014-2019 was permanent units, compared with 20% in 1999-2004.
- Rising construction costs, which could mean developers produce less housing stock at the same costs.

Given the scale of the need, this report recommends evaluating additional funding allocations to the HTF based on the best available data on housing needs.

- **Establish a dedicated funding source for temporary housing.** Across the state, the housing needs of migrant workers for temporary housing are high. There are also several challenges unique to temporary housing development. For example, temporary housing has the same operating costs as permanent housing but lower cash flow given the lack of year-round revenue. Due to higher operating costs and lower rents that can be achieved with temporary units, the private market is unlikely to build temporary housing for migrant workers. Shortages

in temporary housing make migrant workers more likely to live unsheltered or in unsafe or unhealthy housing situations. Establishing a dedicated funding source for temporary housing with a higher portion of funds for maintenance and operations can alleviate housing challenges in local housing markets.

- **Implement the Joint Legislative Audit and Review Committee (JLARC) recommendation to retool the tax exemption for farmworker housing.** Many housing developers, including private developers, nonprofits and public agencies, build housing that serves multiple populations. For example, housing providers may build homes for agricultural workers, people with disabilities, and large families. By offering housing for multiple types of residents, housing providers increase their financial inflow by reducing the likelihood that units will sit vacant because they cannot find a tenant in the target group. Community support is also typically higher for housing developments that serve a broader range of groups than for developments targeted specifically for lower-income or higher-need households.

The current sales tax exemption's requirements for occupancy differ from other common housing funding sources. The exemption is not utilized to the extent it should because occupancy requirements differ from other funding sources.¹⁷⁹ In addition, "agricultural employee" is defined differently for the exemption and other funding sources. This can limit housing providers from combining multiple funding sources and using the exemption. Aligning the definitions and occupancy requirements with other housing fund sources can encourage the use of the exemption.

In addition, the Department of Revenue (DOR) has a policy that restricts the use of seasonal farmworker housing developed using the exemption for other purposes at any time during the year. Any use other than farmworker housing during the winter in the first five years would make a property ineligible for the exemption.¹⁸⁰ This creates a situation where housing providers restrict farmworker beneficiaries from taking on non-farm work in certain seasons. Another regulation requires facility managers to reserve 25% of beds for walk-ins, but there is no clarity about who qualifies as a walk-in.

Refining these regulations to clarify requirements would give housing developers, nonprofits and public agencies greater confidence that they can meet the funding requirements. When

¹⁷⁹ See: Washington State Joint Legislative Audit and Review Committee, "2020 Tax Preference Performance Reviews: Farmworker Housing," (December 2020), https://leg.wa.gov/jlarc/taxReports/2020/farmhousing/f_final/default.html

¹⁸⁰ Ibid.

regulations are unclear, developers may choose not to build housing, and nonprofit and public agencies may choose not to operate housing facilities out of fear of losing funding.

- **Advocate changes to the USDA that make it easier to combine Rural Development (RD) funding with other sources.** USDA RD funds are a key source for funding farmworker housing development in rural communities. However, this funding requires strict financing and operating conditions, making it challenging to combine funds. For example, for the loan program for constructing on-farm housing, applicants must be “unable to obtain credit from any other source” – which may preclude projects where the developer/farm owner uses loaned funds from a community development bank or other similar institution. Also, as noted above, many housing providers combine funds to increase financial stability, and USDA RD funding conditions do not align with current housing practices or development costs.
- **Evaluate the Housing Trust Fund allocation of funding to rural versus urban areas and consider offering support to rural communities in applying for funding.** Rural communities have limited local funding options in rural areas than in urban areas. For example, only areas within urban centers or unincorporated UGAs designated as residential target areas are eligible to implement a Multi-family Tax Exemption (MFTE) program to support the construction of affordable housing, meaning that some rural areas do not have access to this tool.¹⁸¹ Rural communities also have less housing overall, so farmworkers may face homelessness or live in overcrowded housing.

The current HTF legislation¹⁸² establishes a statutory target that at least 30% of the funds in any given funding cycle must benefit projects in rural areas of the state. Evaluating funding allocations to ensure this target is met ensures continued housing support for rural areas. This could include providing a funding source for technical assistance to help rural communities submit funding applications.

¹⁸¹ [RCW 84.14.040](#)

¹⁸² [RCW 43.185.050](#)

Housing Development Recommendations

- **Encourage cities to increase zoning and infrastructure investments for multi-family housing within urban growth areas.**

Local regulations and discretionary processes tied to approval for farmworker housing may create challenges for housing development for farmworkers. This is because many communities lack affordable housing for low-income residents or those experiencing homelessness. Farmworkers, especially seasonal workers, are viewed as competition for limited available units. Some residents may also harbor negative perceptions about farmworkers and farmworker communities.

“Some people say farmworkers should be out on a farm somewhere. Others say you shouldn’t build a three-story building on farmland. Somewhere else is always the better place for farmworker housing.”

-Interviewee

Requirements for discretionary processes, such as design review for farmworker housing development, can create long, unpredictable processes for developers and potentially create a platform that channels negative community input. This adds costs and risks to development. The high cost of infrastructure investments, especially connections to public water and sewer, is another barrier to housing developments for farmworkers. Encouraging cities to increase zoning for multifamily housing in urban areas and strategic investments in infrastructure would support additional housing development and make it easier to build affordable housing for farmworkers.

- **Remove barriers to the development of rental housing.** Farmworkers seeking rental housing on the private market share major challenges with other people with similar incomes. This includes an overall shortage of units affordable to individuals earning 40-60% MFI and a shortage of rental homes overall, especially units large enough to accommodate families. Encouraging cities to identify and remove barriers to rental housing development is an important strategy to address housing needs for farmworkers.

- **Evaluate eligibility requirements for subsidized housing and/or prioritization of subsidized housing funds.** Across the state, we find that farmworker wages range from 40-60% of HUD-area MFI estimates. Many workers, both year-round and migratory, struggle to compete in local housing markets with these wages. On the other hand, many farmworkers are ineligible for priority for subsidized housing because the area median incomes in rural counties are low enough that they earn more than the 30% MFI threshold for priority on the waiting list. Given that housing supply overall is low in many communities, with vacancy rates below 5%, there is very little market-rate housing available to households that earn between 40%-60% MFI.

Program Recommendations

- **Establish housing navigators for farmworkers.** Farmworkers face unique barriers to finding suitable housing. Housing navigators can help address these barriers by providing services during the preparation and early search phases customized to meet families' needs, including helping households know fair housing rights and providing assistance in multiple languages. Housing navigators can also assist with landlord-facing services, such as submitting rental applications and communicating with landlords. They can also support families in housing search and lease-up processes.

Other Recommendations

- **Evaluate reforms to the H-2A guest worker program.** Overall, agricultural employment has grown from 2008 to 2018. Year-round employment has remained relatively stable as a proportion of the workforce, while domestic migrant employment has decreased in its share of total farmworker employment from 56% to 46%. Foreign workers through the H-2A visa program have increased to fill this gap. As shown in Exhibit 9, H-2A workers have increased from 2% to 12% over the same period – a total increase of almost 17,000 workers. While the use of the H-2A program has ballooned across the state, both growers and farmworkers described the need for program reform. From the farmworker's perspective, working conditions are often poor or unsafe. While housing is provided and is based on temporary housing standards, its quality varies. Growers value the access to a stable workforce that the H-2A program provides but see room for improvement. It is currently cumbersome, time-consuming, expensive and inflexible in its design.

Specific ideas for reform to the application process include:

- **Streamline the application process.** Like other visa programs, the H-2A visa program is intended to provide employers with temporary non-U.S. workers only if an employer can prove they were unsuccessful at hiring American workers. This requirement creates a time-consuming labor search process to demonstrate the shortfall of domestic workers so employers can be eligible.
- **Costs.** Many growers referenced the need for more coordination and consistency among agencies providing funding for farmworker housing (such as HUD, USDA, and Commerce) to avoid being subjected to multiple inconsistent requirements. According to the American Farm Bureau, using the H-2A program has also increased federal audits among growers,

adding challenges and costs, including time or labor to support the audit. Another reason for added costs is lack of flexibility based on the duration of work. The program currently defines seasonality as 10 months or fewer (except for work with livestock), but the costs associated with the program are the same whether growers hire workers for two weeks or nine months. Growers must also renew contracts if the growing season lengthens and they need labor for longer than anticipated.

- **Advocate for immigration reform.** According to anecdotal data, some farmworkers lack authorized immigration status. Undocumented immigrant farmworkers face many challenges. They are often unable to advocate for better housing or conditions for fear of being penalized for their immigration status. While state and local government assistance has been available to farmworkers during the COVID-19 pandemic, undocumented workers are ineligible for federal public benefits such as extra unemployment insurance or stimulus checks. Advocating for comprehensive immigration reform can address the needs of these vulnerable farmworkers.

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Tara Satushek

From: Liam Diephuis <lr_diephuis@gmail.com>
Sent: Wednesday, September 18, 2024 6:14 PM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

Good day to the Planning Commission,

I am generally very encouraged by what I see with Skagit County's Housing Element Preliminary Policy Revisions, particularly the revisions that prioritize middle housing, infill development, and racial equity. I would suggest that the final housing policy revision be more specific than using "strategies to mitigate displacement of [low-income households]."

In policy number 2A-1.1 of the Land Use Preliminary Policy Revisions, consider adding public transit service to the list of governmental facilities and services required for an urban growth area. Policy number 2A-1.5 is encouraging to me because ADUs are a valuable tool to increasing the size, flexibility, and density of our housing supply.

In the Economic Development Preliminary Policy Revisions, consider clarifying the new goal at the top of page 4 to stipulate that infrastructure improvements should be given to pedestrian, cycling, and rail transportation along with automobiles. I am encouraged by the specification of Goal 11E to include living wages, education, human services, and housing, and to encourage businesses to operate in a more environmentally sustainable way.

Thank you,
-Liam Diephuis
414 Park Street,
Mount Vernon, WA 98273

Tara Satushek

From: Elizabeth Lunney <interimdirector@skagitonians.org>
Sent: Wednesday, September 18, 2024 10:08 PM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

September 18, 2024

Skagit County Planning & Development Services
1800 Continental Place
Mount Vernon, WA 98273

RE: Comments to Draft Skagit County 2025 Comprehensive Plan Update: Natural Resource Lands

Dear Planning Department:

Thank you for the opportunity to comment on the second tranche of Comprehensive Plan: Housing, Land Use and Economic Development. These comments are submitted on behalf of Skagitonians to Preserve Farmland.

Our comments pertain the proposed revisions as they might impact Agricultural Natural Resource Lands and the related agriculture economy. They should be taken in context regarding Comp Plan guidance regarding Ag-NRL lands and other related policies. The County must, at the end of the day, ensure a seamless and holistic plan that provides strong guidance, across the plan, to protect Skagit's unique agricultural resources.

Agriculture is a productive and vital part of the Skagit Valley economy. Continued viability depends upon protecting a critical mass of farmland, now zoned as Agricultural-Natural Resource Lands, capable of supporting Skagit's uniquely diverse agriculture industry. Thankfully, the County has a long history of public support for farmland protection. In 1996, a survey of registered voters in Skagit County demonstrated support for an increase in property taxes to purchase development rights on farmland, an expression of support that led directly to the creation of the Farmland Legacy Program. Even today, in surveys conducted for the County as part of this Comprehensive Plan Update, farmland preservation tops the list of citizen concerns across demographic bands. This update to the Comprehensive Plan provides an opportunity for Skagit County to further strengthen its protection of farmland by ensuring no further loss of farmland through the de-designation of Ag-NRL zoned lands, the elimination of incompatible uses, and the application of comprehensive and integrated planning with regards to natural resources in the Skagit Valley.

Our specific comments on the proposed policy revisions are as follows:

Housing Element Preliminary Policy Revisions

7C – 1.2 Allow reduced minimum lot sizes, OUTSIDE OF THE AG-NRL, in exchange for community facilities and amenities such as parks, open space, recreational facilities, and community centers.

Skagitonians does not object to the reduction of minimum lot sizes OUTSIDE of Agricultural-Natural Resource Lands. This policy is reasonable where density may be desirable to meet affordability, walkability, or other community needs. However, this policy should be clarified to exclude the Ag-NRL, where 40-acre lots sizes have been instrumental in the preservation of viable, working farmland.

7E – 1.1 Work in partnership with other public agencies and the private sector to ensure an adequate supply of farmworker housing. . . Recognize farmworker housing would occur primarily in urban areas where services are available

and secondarily in rural areas when sensitively designed to minimize loss of agricultural lands of long-term commercial significance. . . .

Skagitonians supports this amendment. The right solution to a lack of appropriate zoning and density in UGAs to support farmworker housing in urban areas is to change zoning to better meet the needs of farmworkers in existing urban areas. Using farmland to meet current needs for farmwork housing undermines the agricultural economy these workers—and the county--depend upon.

Land Use Preliminary Policy Revisions

2A-8.3 Maintain zoning maps for each of the Urban Growth Areas showing the zoning of all lands within the unincorporated portions of the Urban Growth Areas.

Skagitonians supports the County maintaining accurate and publicly available records of its zoning and land use plans. We do not understand how the elimination of this policy would support transparency and evidence-based decision making.

2G-1.1 Allow the separation of an existing house from the larger parcel where it is located on lands designated Agricultural-Natural Resource Land and Rural Resource-Natural Resource Land in order to encourage long-term protection of agricultural land. Establish conservation easement on the separated resource land in perpetuity.

Skagitonians supports the addition of language here that might encourage protection of agricultural land. However, as currently phrased, the addition is toothless. Skagit County’s Farmland Legacy Program provides a vehicle for establishing conservation easements on such land to protect them in perpetuity. This policy should be rephrased to be establish a conditional relationship: “Allow the separation of an existing house from the larger parcel. . . .*where a conservation easement has been established on the separated resource land to protect it in perpetuity.*”

SPF proposed revision: “On lands designated Agricultural-Natural Resource Land and Rural Resource-Natural Resource Land, allow the separation of an existing house from the larger parcel where it is located when a conservation easement has been established on the separated resource land to protect it in perpetuity.”

Economic Development Preliminary Policy Revisions

[New Goal] Establish a land use framework in Skagit County that supports diverse businesses, enhances natural resource industries

As this policy is written, it is impossible to determine, at face value, whether this goal seeks to expand businesses independent of existing natural resource industries, thus proclaiming a “best of both worlds” ambition that often results in the sacrifice of one over the other. Skagitonians would support a policy that explicitly calls for the development infrastructure and processing support for natural resource industries that does not detract or diminish existing natural resource industries.

SPF proposed revision: “Establish a land use framework in Skagit County that supports natural resource industries, enhances diverse businesses, and does not detract or diminish existing natural resource industries.”

[New Policy] Work with the cities to align comprehensive plans and future economic development opportunities through zoning and development regulations.

Again, this goal is vague and indeterminate. What new guidance does it provide? The reasoning provided in the draft provides more insight: “The County should continue to work with cities to find a balance between the rural natural resource lands and urban lands. As these lands provide support to one another.” This language should be folded into the policy and strengthened.

SPF proposed revision: “Work with the cities to align comprehensive plans and future economic development opportunities through zoning and development regulations that support natural resource industries.”

11-A. Encourage a mix of diverse non-resource-based industries that complement and enhance resource-based industries as a major part of Skagit County’s economy.

Previously, this goal was written to include only resource-based economies. Skagitonians does not object to the development of non-resourced based industries, but the new goals cited above, with their direct reference to zoning and regulations, give us great pause. It is not enough to stipulate that non-resourced-based industries should “complement and enhance resource-based industries.” Any non-resource-based industry should not impinge, in any way, on the resource lands and related industry of Skagit County.

SPF proposed revision: “Encourage a mix of diverse non-resource-based industries that complement and enhance resource-based industries as a major part of Skagit County’s economy without impinging upon or diminishing the resource lands and related industry of Skagit County.”

Thank you for the opportunity to comment on these elements of the 2025 Comprehensive Plan Update. We look forward to reviewing further elements of the plan and working with the County to ensure the long-term viability of Skagit agriculture.

Sincerely,
Kim Good Rubenstein
President, Board of Directors
Skagitonians to Preserve Farmland
414A Snoqualmie Street
Mount Vernon, WA 98273

Tara Satushek

From: Andy Dugan <director@skagitvlp.org>
Sent: Thursday, September 19, 2024 4:23 PM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

Dear Commissioners,

We are writing to provide comments on the Skagit County Comprehensive Plan, specifically relating to housing quality, farmworker housing, and manufactured housing. We believe that the plan's success in addressing the housing crisis in our community depends on comprehensive policies that safeguard the rights of all residents, particularly vulnerable populations.

Housing Quality

We support the goal which seeks to preserve, conserve, and enhance the existing housing stock, including historic structures. We encourage the development of design guidelines and standards to ensure that new housing aligns with applicable building codes and contributes to the long-term quality of Skagit County's housing stock.

However, it is equally important to address the maintenance and repair of private residences which is not sufficiently covered in the current plan. Our existing housing stock remains essential in meeting the needs of our community. We urge the County to establish funding mechanisms for homeowners. This would help preserve habitable housing and maintain safe living conditions. In particular, we suggest the creation of a program offering low-interest loans to landlords for necessary repairs. This incentive would enable landlords to maintain their properties to a high standard without the burden of financial constraints. This benefits tenants and improves overall housing quality. Coupled with regular inspections, this approach would support tenant rights while ensuring compliance with housing standards.

Farmworker Housing

We would like to underscore the pressing need for improved seasonal farmworker housing in Skagit Valley. The distinction between seasonal and migrant farmworkers is critical when addressing housing needs. Seasonal farmworkers live in or near Skagit Valley year-round, working for a single agricultural employer only during certain times of the year, such as during planting, growing, or harvest seasons. Outside of these periods, they may take on other jobs at different farms but do not travel to other regions for work.

In contrast, migrant farmworkers come to Skagit Valley from outside the area, sometimes from other states or countries, during peak agricultural seasons. Migrant farmworker housing is often subject to stricter regulations. However, this oversight does not extend to seasonal farmworker housing. This results in significant disparities in housing quality and availability.

Skagit County has some of the most inadequate housing for seasonal farmworkers in the Pacific Northwest. Many farm labor contractors and farm owners provide substandard or uninhabitable housing options. Most seasonal farmworkers have few alternatives. These workers, who are full-time residents of Skagit County, often face poor living conditions with little recourse.

We urge the County to recognize the difference between seasonal and migrant farmworkers and to take action to address the substandard living conditions many seasonal farmworkers endure. It is crucial that full-time Skagit County residents, including seasonal farmworkers, have access to safe and dignified housing.

Manufactured Housing and RVs

We must also address the County's current ordinance prohibiting residents from living in RVs as permanent dwellings. Under SCC 14.04.020, RVs cannot be occupied for more than 180 days in any 12-month period, and only one occupied RV is permitted per lot. This ordinance is selectively enforced and further exacerbates the housing shortage. Currently, hundreds—if not thousands—of Skagit County residents live in RVs or trailers as their permanent homes. When properly maintained with adequate sewage and sanitation, RVs provide a viable and affordable housing option for low-income residents.

We strongly recommend revising this ordinance to allow for greater flexibility in the use of RVs and other alternative housing options, particularly for low-income residents who rely on these solutions. By regulating and promoting proper maintenance, the County can help ensure that these dwellings remain safe and habitable.

Additionally, we support policies that allow manufactured housing in the same locations and at the same density as other housing types. This is an essential policy change for increasing affordable housing in Skagit County. Furthermore, we believe that development and design standards should be applied equally to manufactured homes, ensuring fairness and reducing housing discrimination.

Furthermore, we recommend exploring designated sites for travel trailers and RVs which many Skagit County residents use as temporary or permanent housing solutions. Proper regulation and management of these sites would offer safe, secure, and habitable options for those living in trailers or RVs and address an immediate need in the community.

Preventing Displacement

We support the County's commitment to preventing displacement, addressing past harms, and ensuring housing equity. This should include language access and support for non-English speakers. It is crucial that Skagit County works collaboratively with community groups, non-profits, and businesses to help vulnerable populations access and retain housing. When considering rezoning or land redevelopment for public use, we urge the County to thoroughly evaluate the potential for displacement of low-income residents. By employing proactive strategies, such as community engagement and affordable housing requirements, the County can mitigate the effects of displacement.

We encourage the use of strategies that prevent displacement caused by public investments, market pressures, or redevelopment, ensuring that low-income and vulnerable communities remain protected. Safeguarding these populations from housing instability builds a more equitable future for all residents of Skagit County.

Conclusion

We urge the County to consider additional measures to address housing quality, improve seasonal farmworker housing, and support alternative housing options like manufactured homes and RVs. These actions will help create a more inclusive and secure housing environment for all residents of Skagit County. We appreciate your consideration of our comments and look forward to continued collaboration in shaping Skagit County's housing future.

If you have any additional questions or concerns, please contact Skagit Legal Aid at (360) 230-8101.

Sincerely Yours,

Andrew Dugan Gail Smith
Executive Director, Skagit Legal Aid Chairperson, Skagit Legal Aid

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Andy Dugan (he/him/él)

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