Memo

To: King County Affordable Housing Committee Members

From: McCaela Daffern, Regional Affordable Housing Implementation Manager and Melissa

Aguilar, Regional Affordable Housing Specialist

cc: Housing Interjurisdictional Team

Date: September 23, 2022

Re: Draft Recommended Response to 2021 GMPC Member Amendments

Summary

At the September 29 Affordable Housing Committee (AHC or Committee) meeting, staff will review a recommended approach for addressing 2021 Growth Management Planning Council (GMPC) member amendments to the Countywide Planning Policies (CPP). Committee members will have 25 minutes to ask questions or provide direction on a preferred response to each amendment. Staff will incorporate Committee direction into draft CPP amendments for Committee consideration in November. See Table 1 for a high-level overview of the amendments and proposed actions and Exhibit 1 for a more detailed proposal.

Background

Through GMPC Motion 21-1, the AHC will consider the range of Development Patterns and Housing Chapter amendments proposed by GMPC members in June 2021. Many of the proposed amendments focused on understanding and accommodating housing need, holding jurisdictions accountable, and allocating resources. Throughout the past year, the AHC has made progress on these topics through a recommended accountability framework for equitably meeting King County affordable housing needs and a process for establishing jurisdictional housing needs. The proposed actions to address GMPC member amendments largely align with the direction set forth by the AHC.

AHC staff, in consultation with the HIJT, developed a proposed response to each amendment to serve as a starting point for Committee deliberations on September 29. Table 1 on page 2 contains the amendment number, sponsor name, a summary of the sponsor's proposed amendments to the adopted 2021 CPP, and a proposed AHC action with rationale.

Next Steps

Date	Activity
9/28	GMPC briefed on the proposed approach for addressing 2021 GMPC member
	amendments and provides feedback for consideration by the AHC on 9/29
9/29	AHC considers GMPC input, reviews proposal and provides direction on the
	approach for addressing 2021 GMPC member amendments
9/30-10/20	HIJT CPP Work Group drafts CPP amendments reflecting AHC feedback
11/3	AHC considers draft CPP amendments
11/30	GMPC briefed on status of CPP amendments
12/9	AHC approves CPP amendments

 Table 1. Overview of GMPC Member Amendments and Proposed AHC Actions

Amend. # & Sponsor	Amend. Summary	Proposed AHC Action to Address Amend.	Action Rationale
12 Councilmember (CM) Thomas McLeod, Tukwila	 Strike, clarify, and replace certain statements in the CPP Housing Chapter Narrative Text to: add housing preservation as a tool for addressing need; and address different historical housing patterns and actions needed based on that history. 	Include most of the clarifying text in CPP amendment draft for AHC review in November.	Most amendment text improves the narrative clarity. Some language excluded because: terms could be described using more accurate language; it indicated support for strategies that can lead to displacement; or was contradictory to the overarching goal that housing choice should be provided to every resident.
13 CM Thomas McLeod, Tukwila	 Add text to CPP DP-14 to: ensure comprehensive plans and zoning regulations are consistent with CPP affordable housing and equity goals; and establish minimum growth targets for certain jurisdictions. 	Recommend adoption of different CPP amendments that: • establish a housing-focused accountability framework; • establish jurisdictional housing needs equal to growth targets; and • ensure future growth targets factor in housing needs.	It would be disruptive to change growth targets now, but possible to set policy direction for the 2034 comprehensive plan update cycle to ensure that jurisdictions with large gaps in affordable housing supply plan to meet these housing needs.
14 CM Thomas McLeod, Tukwila	Strike first sentence in CPP H-1 and replace with text that clarifies that each jurisdiction has a role in addressing countywide need and should plan to: preserve, improve, and expand the housing stock; promote fair and equitable housing access; create or preserve housing opportunities for Black, Hispanic, Indigenous, and extremely low-income households; and eliminate race-, place-, ability-, and income-based housing disparities.	Recommend adoption of different CPP amendments that reflect: • the AHC's preferred jurisdictional housing need option; and • language consistent with recent changes to the Growth Management Act (GMA) about planning for and accommodating needs at a wider range of economic segments than the sponsor proposed.	Proposed language was inconsistent with the recently amended GMA; promotion of fair housing policies is articulated in CPP H-21.
15 CM Pam Stuart, Sammamish	Add text to CPP H-1 to: • require comprehensive plans show how the jurisdiction will achieve minimum housing needs by income level; or • require jurisdictions to increase their	Recommend adoption of different CPP amendments that: • establish new countywide need projections; and • articulate jurisdictional housing need by income level and special housing	Requiring a funding plan would be inconsistent with prior planning practices; and to plan for only part of the need would be inconsistent with the GMA and Commerce's draft minimum standards.

Amend. # & Sponsor	Amend. Summary	Proposed AHC Action to Address Amend.	Action Rationale
	total housing stock in certain income bands if these minimum needs cannot be achieved	type.	
16 CM Thomas McLeod, Tukwila	Add a new policy (H-3X) to prioritize the use of resources to provide housing access for very low-income families in high opportunity areas	Consult with Community Partners Table (CPT) at their October 2022 meeting.	Housing access across the county is addressed in the target-setting process; would accelerate displacement and reduce housing choice in low-opportunity areas; is not in aligned with SKHHP's funding priorities; and CPT has expressed interest in shaping policies that create holistic communities countywide.
17 CM Pam Stuart, Sammamish	Add text to CPP H-5 to require a plan to fill all identified gaps in existing partnerships, policies, and dedicated resources for meeting the countywide need and eliminating racial and other disparities affecting housing choice. Failure to do so triggers a county review of the jurisdiction's land use policies.	Recommend adoption of different CPP amendments that: • establish the AHC's recommended accountability framework; and • require jurisdictions plan to address gaps in the Implement Policies and Strategies to Meet Housing Needs Equitably section.	The AHC-recommended accountability framework helps ensure ongoing progress in planning for and accommodating housing need; policy CPP H-5 is about conducting a housing inventory and analysis, not the most suitable location for a policy about a plan to address identified gaps. Jurisdictions can't fill gaps in meeting local need that are not in their control.
18 CM Pam Stuart, Sammamish	Add text to CPP H-8 to require jurisdictional support to housing technical assistance entities in an amount proportionate to jurisdictions' median income and current housing gap.	Do not recommend	Many jurisdictions are members of entities that provide jurisdictional housing technical assistance. The amount of member contributions should be determined by these membership organizations.
19 CM Thomas McLeod, Tukwila	Add text to CPP H-26 to allow a third party to perform annual monitoring.	Include reference to third-party monitoring in recommended CPP amendment establishing the accountability framework.	Provides flexibility in meeting the monitoring requirement.
20 CM Jennifer Robertson, Bellevue	Add text to CPP H-27 recognizing unique characteristics within jurisdictions in addressing housing affordability when monitoring indicates that adopted strategies are not resulting in adequate affordable	Recognize the unique characteristics of each jurisdiction by recommending plan review standards that allow for jurisdictional variation in actions to address housing issues.	The AHC-recommended accountability framework includes reporting, monitoring, and requiring adjustments for all jurisdictions.

Amend. # & Sponsor	Amend. Summary	Proposed AHC Action to Address Amend.	Action Rationale
	housing to meet countywide need.		

Exhibit 1: Draft AHC Response to 2021 GMPC Countywide Planning Policies Housing Chapter Proposed Major Amendments Referenced in GMPC Motion 21-1

Amend. #, Sponsor, Sponsor Effect Statement	Sponsor's Proposed Amendments ¹ to the Adopted 2021 CPP	Proposed AHC Action	Action Rationale
CM Thomas McLeod, Tukwila Clarifying text. Adds housing preservation as a tool for addressing need. Adds statement about different historical housing patterns and actions needed based on that history.	CPP Narrative Text, Housing Chapter The Countywide Planning Policies in the Housing Chapter support a range of affordable, accessible, and healthy housing choices for current and future residents. Further, they respond to the legacy of discriminatory housing and land use policies and practices (e.g., redlining, racially restrictive covenants, exclusionary zoning, etc.) that have led to significant racial and economic disparities in access to housing and neighborhoods of choice. These disparities affect equitable access to well-funded schools, healthy environments, open space, and employment. The policies reflect the region's commitment to addressing the 2018 findings of the Regional Affordable Housing Task Force (Task Force). Key findings include: Dramatic housing price increases between 2012 and 2017 resulted in an estimated 156,000 extremely low-, very low-, and low-income households spending more than 30 percent of their income on housing (housing cost burdened); and Black, Hispanic, Indigenous, and extremely low-income households are among those most disproportionately impacted by housing cost burden While significant new housing growth market activity is needed necessary to reach	Include most of the clarifying text (except text in yellow) in CPP amendment draft for AHC review in November.	Most amendment text improves the clarity of the narrative and does not change the intent. Rationale for not including yellow text: • First part: Low-income is used elsewhere to describe a narrow segment of the population of households earning between 50-80% of AMI. Replace with the term "lower-income." • Second part: Replace the term with the more neutral term "homes currently affordable at or below 80 percent of area median income." • Third part: Focusing policies and incentives to attract higher cost housing can increase displacement pressures in low-income communities. Preservation of affordable homes at risk of price increases is a more equitable strategy addressed earlier in the text. • Fourth part: Statement is contradictory to the overarching goal that housing choice should be provided to every resident. It also seems redundant to the second part of the sentence

¹ Staff adjusted CPP policy numbers referenced by GMPC members to reflect the adopted CPP policy numbers.

Amend. #, Sponsor, Sponsor Effect Statement	Sponsor's Proposed Amendments ¹ to the Adopted 2021 CPP	Proposed AHC Action	Action Rationale
	overall King County housing growth targets,		stating, "take actions that
	new the ability of the region's housing		eliminate race-, place-, ability-,
	market growth will not sufficiently to		and income-based housing
	address the housing need <u>s</u> <u>for of low-</u>		disparities."
	income households is limited.		
	Consequently, A large majority much of the		 Note: Narrative text may change
	need for low-income housing will need to		based on jurisdictional
	be addressed with through:		affordable housing need option
	A) the creation of units restricted to		selected in September.
	income-eligible households – both rent-		
	restricted units and resale restricted		
	homes ("income-restricted units"); and,		
	B) the preservation of existing naturally		
	occurring affordable housing where it		
	Still exists;		
	Building on the Task Force's work, this		
	chapter establishes goals and policies		
	intended to address the a countywide need		
	for affordable housing. The purpose is to		
	ensure the provision of sufficient defined		
	as the additional housing units needed in		
	King County by 2044 so that no household		
	with an income at, or below, 80 percent of		
	Area Median Income (AMI) is housing cost		
	burdened. While the need is expressed in		
	countywide terms, These CPPs also		
	recognize that housing affordability varies		
	significantly across jurisdictions. In		
	addressing housing needs, less affordable		
	jurisdictions will need to take significant		
	action to increase affordability across all		
	income levels for low-income housing,		
	while more affordable jurisdictions will		
	need to take significant action to preserve		
	affordability <u>and plan</u> <u>for housing that</u> serves all economic segments of the		
	population. Moreover, to redress past		
	inequities, less affordable jurisdictions will		

housing choices to every resident in King County. All jurisdictions will work to:

Amend. #, Sponsor, Sponsor Effect Statement	Sponsor's Proposed Amendments ¹ to the Adopted 2021 CPP	Proposed AHC Action	Action Rationale
	 preserve, improve, and expand their housing stock; promote fair and equitable access to housing for all people; create housing opportunities for Black, Hispanic, Indigenous, and extremely low-income households; and, take actions that eliminate race-, place-, ability-, and income-based housing disparities 		
CM Thomas McLeod, Tukwila I would like to hold jurisdictions to minimum growth standards.	CPP DP-14 All jurisdictions shall accommodate housing and employment by: Using the adopted growth targets as the land use assumption for their comprehensive plan; Establishing local growth targets for regional growth centers and regional manufacturing-industrial centers, where applicable; Ensuring adopted comprehensive plans and zoning regulations provide capacity for residential, commercial, and industrial uses that is sufficient to meet 20- year growth targets and is consistent with the desired growth pattern described in VISION 2050; and affordable housing and equity goals established in the CPP's; d) Ensure growth for jurisdictions with less than 50% of their total housing stock affordable at or below 100% AMI, growth targets must be greater than or equal to 50% of the existing gap. Applicable to all jurisdictions with 1500 or more total housing units. For example, if a jurisdiction has 10,000 housing units and 4,000 are affordable at or below 100% AMI, the jurisdiction has a gap of 1000 units	Support the concept of holding jurisdictions to higher standards through recommend adoption of CPP amendments that: • establish a housing-focused accountability framework; • establish jurisdictional housing needs equal to growth targets; and • ensure future growth targets factor in housing needs. Consider amendments to the Development Patterns Chapter that clarify the relationship of growth targets to housing needs to ensure future growth targets factor in housing needs when set.	• It would be disruptive to change growth targets now, as many jurisdictions have already started updating their comprehensive plans using their adopted growth targets as the basis for assumptions in their comprehensive plans. However, it would be possible to set policy direction for the 2034 comprehensive plan update cycle to ensure that jurisdictions with large gaps in the supply of homes affordable to low- and moderate-income households plan to meet these housing needs.

Amend. #, Sponsor, Sponsor Effect Statement	Sponsor's Proposed Amendments ¹ to the Adopted 2021 CPP	Proposed AHC Action	Action Rationale
	affordable at or below 100% AMI. Therefore, their housing target must be at least half of the 1000 unit gap or 500 units. d e) Ensuring adopted local water, sewer, transportation, utility, and other infrastructure plans and investments among agencies, including special purpose district plans, are consistent in location and timing with adopted targets as well as regional and countywide plans; and e f) Transferring and accommodating unincorporated area housing and employment targets as annexations occur.	-	
Clarifies that each jurisdiction has a role in planning for affordable housing, promoting fair housing, and creating or preserving housing as part of addressing countywide need.	CPP H-1 All comprehensive plans in King County combine to address the countywide need for housing affordable to households with low, very low, and extremely low incomes, including those with special needs, at a level that calibrates with the jurisdiction's identified affordability gap for those households and results in the combined comprehensive plans in King County meeting countywide need. The combination of all the comprehensive plans in King County should address the countywide need for housing affordable to households with low, very low, and extremely low incomes, including people with special needs. Each jurisdiction's comprehensive plan should: 1) preserve, improve, and expand the local housing stock, 2) promote fair and equitable access to housing, 3) create, or preserve where already existing, housing opportunities for Black, Hispanic, Indigenous, and extremely	Support the concept of clarifying jurisdictional roles through amendments that reflect the AHC's preferred jurisdictional housing need option and language about Housing Elements from the Growth Management Act (RCW 36.70A.020). Anticipated changes include: • a new statement about planning for and accommodating housing affordable at each economic segment, • replacing information about countywide housing need with Commerce's countywide housing need projections, and • a table showing jurisdictional shares of countywide need by income band and special housing type.	 Proposed language about lowincome households is inconsistent with the Growth Management Act, which requires jurisdictions to plan for the housing needs of households earning above 80% AMI. The need option selected and amendments to CPP H-1 will clarify each jurisdiction's responsibility in meeting their share of countywide need at each income level and for special housing types. Promotion of fair housing policies is articulated in CPP H-21.

Amend. #, Sponsor, Sponsor Effect Statement	Sponsor's Proposed Amendments ¹ to the Adopted 2021 CPP	Proposed AHC Action	Action Rationale
imbalances exist in order to meet the overall countywide goals. Providing minimums for every jurisdiction is a safety net only as every jurisdiction with imbalances should be submitting plans to correct those imbalances per the CPPs. If jurisdictions are meeting all goals stated in the CPPs, these minimums will never be needed.	OR a minimum of 40% of total housing supply at or below 100% AMI OR if neither of the above can reasonably be achieved, for each AMI bracket not meeting the county wide targets of 15%, 15%, and 19%, respectively, the jurisdiction must submit a plan to increase their total housing stock in that bracket by 20%.		level, permanent supportive housing, and emergency shelter/housing.
16 CM Thomas McLeod, Tukwila Promotes seeking to invest in access to affordable housing in high-opportunity areas.	H-3X (New Policy) Prioritize the use of local and regional resources to provide housing access for very low-income families in high opportunity areas (i.e. areas with high quality schools, jobs, transit and access to parks, open space, and clean air, water, and soil) and avoid actions that perpetuate historical patterns of poverty concentration and unequal access to opportunity for BIPOC and low-income communities.	Consult with the Community Partners Table at their October 2022 meeting.	 This amendment would accelerate displacement and reduce housing choice in low-opportunity areas. It would also require low-opportunity parts of South King County to send their resources to high opportunity parts of East King County, which is not in alignment with the goals of SKHHP. Housing access for very low-income households in high opportunity areas is addressed in the target-setting process. The Community Partners Table may be interested in shaping this amendment to reflect promotion of amenities in low-opportunity areas and creating holistic communities countywide.
17 CM Pam Stuart, Sammamish To ensure ongoing progress toward filling gaps in affordable housing and the inequities that	CPP H-5 Evaluate the effectiveness of existing housing policies and strategies to meet a significant share of countywide need. Identify gaps in existing partnerships, policies, and dedicated resources for meeting the countywide need and	Support the concept of identifying gaps, providing plans to address gaps, and the concept of review through different amendments more aligned with the AHC's recommended	The AHC-recommended accountability framework helps ensure ongoing progress in planning for and accommodating housing need.

Amend. #, Sponsor, Sponsor Effect Statement	Sponsor's Proposed Amendments ¹ to the Adopted 2021 CPP	Proposed AHC Action	Action Rationale
follow. Without any action if gaps are not addressed, the policies will likely not be effective.	eliminating racial and other disparities in access to housing and neighborhoods of choice. Provide a plan to fill all identified gaps. Failure to provide a revised plan to fill the identified gaps will trigger a county review of the jurisdiction's land use policies.	accountability framework. Planned amendments include those that: Establish the AHC's recommended accountability framework, including: AHC review of the housing-related components of a jurisdiction's comprehensive plan; Annual measurement of jurisdictional progress to plan for and accommodate affordable housing targets in dashboard using standardized benchmarks, housing data trends, and comparative standards; and AHC and GMPC review of monitoring and reporting data, identification of jurisdictions with significant shortfalls in planning for and accommodating affordable housing targets, and authority to require those jurisdictions to take reasonable measures to adjust plans or land use maps to address significant shortfalls. Require jurisdictions to propose policies and implementation details that demonstrate a plan to address gaps in the "Implement Policies and Strategies to Meet Housing Needs Equitably" section, such as: H-XX Adopt and implement policies that improve the effectiveness of existing housing policies and strategies to meet jurisdictional housing needs and fill gaps in	 Policy H-5 is about conducting a housing inventory and analysis, not the most suitable location for a policy about a plan to address gaps is in the "Implement Policies and Strategies to Meet Housing Needs Equitably" Housing Chapter section. Jurisdictions can't fill gaps in meeting local need that are out of their control. Language softened to require a plan to address gaps, not all gaps. Note: Draft policy language will be provided to the AHC at their November meeting.

Amend. #, Sponsor, Sponsor Effect Statement	Sponsor's Proposed Amendments ¹ to the Adopted 2021 CPP	Proposed AHC Action	Action Rationale
		partnerships, policies, and dedicated resources for meeting the countywide need and eliminating racial and other disparities in access to housing and paighborhoods of choice.	
18 CM Pam Stuart, Sammamish To ensure that all jurisdictions are contributing proportionately to the fill the affordable housing gaps.	CPP H-8 Work cooperatively with the Puget Sound Regional Council, subregional collaborations and other entities that provide technical assistance to local jurisdictions to support the development, implementation, and monitoring of strategies that achieve the goals of this chapter. Provide support proportionate to jurisdictions' median income and current housing gap – ie where gaps in affordable housing stock are the larger and median incomes are higher, financial support will be proportionately more.	neighborhoods of choice. Do not recommend	Many jurisdictions are members of subregional collaborations that provide technical assistance to local jurisdictions to support the development, implementation, and monitoring of goals of this chapter (e.g., A Regional Coalition for Housing and South King Housing and Homelessness Partners). The amount of member contributions should be determined by these membership organizations.
CM Thomas McLeod, Tukwila H-21 says, enforce fair housing policies and practices, and CPPs say each jurisdiction has a responsibility to address its share of the countywide housing need. What I question is how are we enforcing, or overseeing that each jurisdiction does their fair share? I feel using data on the KC Affordable Housing Dashboard does not elevate jurisdictional performance enough. I would like to see a 3rd-party consultant report that highlights, promotes each jurisdictional effort, measured	CPP H-26 The county, or third-party consultant, will annually provide transparent, ongoing information measuring jurisdictions' progress toward meeting countywide affordable housing need, according to H-25, using public-facing tools such as the King County's Affordable Housing Dashboard.	Include reference to third-party monitoring in recommended CPP amendment establishing the AHC-recommended accountability framework. Draft policy language will be provided to the AHC at their November meeting.	Provides flexibility in meeting the monitoring requirement. Note: In amendment proposal, the sponsor bolded some text in policy H-21 to draw a connection between those contents and his proposed amendment. For clarity, that background text was excluded from the proposed amendment text shown.

Amend. #, Sponsor, Sponsor Effect Statement	Sponsor's Proposed Amendments ¹ to the Adopted 2021 CPP	Proposed AHC Action	Action Rationale
against CPP and individual Comprehensive Plan. I don't know how else to enforce jurisdictional performance other than to report our on jurisdictional progress. Perhaps it would be an Affordable Housing Report Card, not just data on a dashboard, but a performance measure to what jurisdiction said they would do.			
CM Jennifer Robertson, Bellevue The proposed changes to Policies H-25, H-26 and H-27 are being recommended by the city of Bellevue with the intent of ensuring that the data collection, monitoring and analysis of housing data across jurisdictions results in data that is consistent. The proposed language also provides for collaboration with regional data collection efforts so that significant burden is not placed on individual jurisdictions to fulfill the data collection and monitoring requirements.	CPP H-27 Review and amend countywide and local housing strategies and actions when monitoring in Policy H-25 and H-26 indicates that adopted strategies are not resulting in adequate affordable housing to meet the countywide need with the recognition of unique characteristics within jurisdictions in addressing housing affordability. Consider amendments to land use policies and the land use map where they present a significant barrier to the equitable distribution of affordable housing.	Recognize the unique characteristics of each jurisdiction by supporting plan review standards that allow for jurisdictional variation in actions to address housing issues.	The AHC-recommended accountability framework includes reporting, monitoring, and requiring adjustments for all jurisdictions. Note: Original sponsor effect statement refers to proposed changes to policies H-25 and H-26, which passed in 2021.