

# Memo

**To:** King County Affordable Housing Committee Members  
**From:** Carson Hartmann, Regional Affordable Housing Planner  
**cc:** Housing Interjurisdictional Team  
**Date:** June 9, 2023  
**Re:** Jurisdictional Comparative Standard Options Discussion

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## Purpose of June 15 AHC Meeting

At the June 15 Affordable Housing Committee (AHC) meeting, members will review and provide input on three options for comparing jurisdictional progress toward planning for and accommodating housing needs over the 2024-2044 comprehensive planning cycle (see [Tables 1 and 2](#)).

While reviewing Tables 1 and 2, Committee members should consider the following question:

- Which of the outlined proposals do you think would work best to compare jurisdictional progress towards planning for and accommodating housing needs? Why?

## Background

In June 2021, the Growth Management Planning Council (GMPC) passed Motion 21-1,<sup>1</sup> which requested that the AHC:

1. **monitor and report** jurisdictional housing supply, housing affordability, housing needs, and income-restricted housing levels, including disparities between subregions and comparisons to established housing goals and targets, through the Regional Affordable Housing Dashboard and reporting;
2. establish subregional or **jurisdictional affordable housing needs**, informed by local data and the data and methodology provided by the Washington State Department of Commerce;
3. recommend to the GMPC an **accountability and implementation framework** for equitably meeting affordable housing needs across the region. The AHC was to consider, at a minimum, the range of Countywide Planning Policies (CPP) Development Patterns and Housing Chapter amendments proposed by GMPC members in June 2021 regarding understanding and accommodating housing need, holding jurisdictions accountable, and allocating resources; and
4. recommend to the GMPC any **CPP amendments** necessary to implement their recommendations.

In December 2022, the AHC approved and transmitted recommended CPP amendments, an accountability framework, and plan review standards to the GMPC in response to Motion 21-1.<sup>2</sup> The accountability framework included three components:

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<sup>1</sup> Growth Management Planning Council Motion 21-1, May 25, 2021 [\[link\]](#)

1. **Review Plans:** Before adoption of a periodic update to a comprehensive plan, the AHC reviews draft plans for alignment with the CPP Housing Chapter and comments. Plan review occurs once every ten years, starting in late 2023.
2. **Monitor and Report:** After comprehensive plan adoption, the AHC measures jurisdictional progress to plan for and accommodate affordable housing need in dashboard using standardized benchmarks, a comparative standard, and housing data trends. Monitoring occurs annually, starting in 2024
3. **Mid-Cycle Check-in and Adjustment:** Five years after comprehensive plan adoption, the GMPC reviews the information collected through annual monitoring and reporting. Based on this analysis, the GMPC identifies jurisdictions with significant shortfalls in planning for and accommodating housing needs, provides findings that describe the nature of shortfalls, and may make recommendations that jurisdictions take action to address them. Jurisdictions with significant shortfalls in planning for and accommodating need then identify and implement actions to address the shortfalls. Occurs every ten years, starting in 2029.

The GMPC considered and approved CPP amendments that would establish this accountability framework in March 2023. The GMPC transmitted the CPP amendments to King County Council in May 2023, including policy H-28, which would commit the GMPC to annual monitoring using a comparative standard.<sup>3</sup> If approved by King County Council, CPP amendments will need to be ratified by cities in King County, which is anticipated to occur in the first quarter of 2024.

To prepare for the potential CPP amendments approval, the AHC will consider and provide input on options to measure and evaluate jurisdictional progress on planning for and accommodating housing needs at their June 15, 2023 meeting. Deciding on a method of comparing jurisdictional progress will be central to the AHC's annual monitoring and reporting and mid-planning cycle check in.<sup>4</sup> It will also affect how the AHC chooses to update and evolve the data reporting functionalities of the [Regional Affordable Housing Dashboard](#) in 2024.<sup>5</sup>

## Next Steps

Timeframe	Actions
July 2023 - December 2023	<ul style="list-style-type: none"> <li>• HIJT and CPT assist staff in fine-tuning options for AHC selection in 2024</li> </ul>
January 2024 - June 2024	<ul style="list-style-type: none"> <li>• AHC staff finalize options for selection and AHC selects preferred option</li> <li>• AHC and staff, with assistance from HIJT and CPT, finalize option details, including specific measures and data sources, data collection and reporting procedures, and necessary RAH Dashboard updates</li> </ul>

<sup>2</sup> AHC Recommended Response to Growth Management Planning Council Motion 21-1 [\[link\]](#)

<sup>3</sup> King County Council Ordinance 2023-0199, May 23, 2023 [\[link\]](#)

<sup>4</sup> While the comparative standard will be integral to the midcycle check, work still needs to be done to define how jurisdictional progress will be measured during this check-in and how the comparative standard will be used to identify shortfalls. The AHC will take this up no sooner than January 2025.

<sup>5</sup> The AHC will coordinate with the Department of Commerce on implementation of HB 1241, which requires that jurisdictions within counties of a certain size, density, and/or annual growth rate (including King County) report to Commerce on progress to implement their comprehensive plans five years after plan adoption. As a part of implementation, Commerce will also develop guidelines for indicators, measures, and milestones to measure implementation progress in the first five years of the planning period, work that could potentially compliment the AHC's comparative standard and mid-cycle check-in efforts.

## Table 1. Comparative Standard Options

The table below lists **three potential options** for comparing jurisdictional progress towards planning for and accommodating housing needs.

Each option would use data about either drivers or outcomes of plans and accommodation of housing needs. Some options would use both.

- “Drivers” include policies passed by the jurisdiction to change zoning designations, incentivize housing production and/or preservation, to protect tenants, to curb displacement, or any other policy in line with the CPP Housing Chapter, and are primarily under the jurisdiction’s control
- “Outcomes” include measures of ways that policies have had an impact in communities, including housing market indicators, counts of homes produced/preserved, measures of cost burden, etc. and are not completely under the control of the jurisdiction.

Due to data lags inherent to housing and demographic data from the US Census, data on “outcomes” would never result in current assessments of a jurisdiction’s progress. “Drivers” on the other hand could be tracked annually through King County-initiated jurisdictional surveys.

To assess these methods, staff analyzed each method’s alignment with staff-recommended key principles. AHC staff’s suggested key principles set a goal that the comparative standard:

1. Is **feasible** to implement and maintain
2. **Sets clear expectations** for adequate plans and accommodations of housing needs
3. Assesses outputs and outcomes achieved on or **after comprehensive plan adoption**
4. Allows for the monitoring of **equitable outcomes**

Table 1 contains a brief description of each method and summarizes its alignment with key principles. Table 2 includes a lengthier description of each method, along with detailed staff analysis of methods alignment with key principles.

**Table 1. Method Alignment with Key Principles**


















<b>KEY PRINCIPLE</b>	<u>List of Priorities</u> <i>Assess jurisdictional progress toward planning for and accommodating housing needs using defined list of priority actions/goals for all jurisdictions for first five years of planning cycle (2025-2030)</i>	<u>Cumulative Grades</u> <i>Assess jurisdictional progress using cumulative grades based on plans and accommodations (drivers) and/or housing outcome measures</i>	<u>Targets</u> <i>Assess jurisdictional progress against annual targets, set by the Committee and published on the Regional Affordable Housing dashboard</i>
1. Is feasible to implement and maintain			
2. Sets clear expectations for adequate plans and accommodations of housing needs			
3. Assesses outputs and outcomes achieved on or after comprehensive plan adoption			
4. Allows for the monitoring of equitable outcomes			

Table 2. Detailed Method Descriptions and Key Principles Analysis

METHOD	DETAILS & EXAMPLES	KEY PRINCIPLES ANALYSIS
<div data-bbox="254 293 338 399">  </div> <div data-bbox="226 415 367 488"> <p>List of Priorities</p> </div>	<p><b>Intent</b> Assess jurisdictional progress toward planning for and accommodating housing needs using defined list of priority actions/goals for all jurisdictions within first five years of planning cycle (2025-2030)</p> <p><b>Options</b> Committee decides a “top five” or “top ten” list of actions that jurisdictions should complete within five years of plan adoption. For example, has the jurisdiction:</p> <ul style="list-style-type: none"> <li>• Ensured that there is enough zoned capacity for housing needs?</li> <li>• Prioritized a certain % of city funds to support low-income housing development or contributed a minimum amount of funds to subregional entities?</li> <li>• Enacted certain set of tenant protections?</li> <li>• Enacted a certain set of fair housing policies?</li> <li>• Passed a certain # or % of policies committed to during plan review?</li> </ul> <p>List of priorities can differ by geography or jurisdictional size</p> <p>Policies annually assigned a status—potential statuses include “Not Implemented,” “Partially Implemented,” and “Fully Implemented”</p> <p>Written assessments or categories could be assigned to jurisdictions, similar to the HRC policy evaluation tool</p> <p><b>Example</b> <a href="#">HRC Policy Score Card</a></p>	<div data-bbox="1270 318 1329 375">  </div> <p><b>Is feasible to implement and maintain</b></p> <ul style="list-style-type: none"> <li>+ Provides an opportunity to collaborate between jurisdictions on priorities for first few years of planning period</li> <li>+ Easy to track progress</li> <li>+ CPP data reporting requirements will provide AHC access to annual updates on plans and accommodations necessary to maintain measure</li> </ul> <div data-bbox="1270 626 1329 683">  </div> <p><b>Sets clear expectations for adequate plans and accommodations of housing needs</b></p> <ul style="list-style-type: none"> <li>+ List of priorities provides clear expectations for jurisdictions in first five years of planning period</li> <li>– Slight concern that the measure prioritizes certain CPPs over others</li> </ul> <div data-bbox="1270 862 1329 919">  </div> <p><b>Assesses outputs and outcomes achieved on or after comprehensive plan adoption</b></p> <ul style="list-style-type: none"> <li>+ List of priorities focused on actions taken or continued after comprehensive plan is adopted</li> <li>+ CPP data reporting requirements will provide AHC annual updates on data</li> <li>– Focused primarily on “drivers,” not “outcomes”</li> </ul> <div data-bbox="1270 1162 1329 1219">  </div> <p><b>Allows for the monitoring of equitable outcomes</b></p> <ul style="list-style-type: none"> <li>+ Priorities can include actions focused on addressing housing disparities and equitable policymaking</li> </ul>

# A+

## Cumulative Grades

### Intent

Assess jurisdictional progress using cumulative grades based on plans and accommodations and/or housing outcome measures

### Options

Method could annually assign jurisdictions a grade (e.g., A-F or out of 100%)

Grades would be cumulative, and based on a rubric of actions, each rated with different points, voted upon by the Committee

Grades could be based on the overall policy/housing affordability environment or on the amount of progress jurisdictions have made since the start of the planning period

In the rubric, certain policy actions could be rated higher than others, based on perceived importance (i.e., zoning changes could be ranked higher than measures to streamline permitting)

Grades could be for both plans and accommodations (efforts) and outcomes, both of which could use different rubrics

Grades could differ by regional geography

### Example

Metropolitan Council's [Housing Performance Scores](#)

UC Berkeley Center for Community Innovation's [ADU California Scorecard](#)

Princeton University Eviction Lab [COVID-10 Policy Scorecard](#)

Urban Institute's [Capital for Communities Scorecard](#)



### Is feasible to implement and maintain

- Complex methodology and potentially arbitrary (and political) process to decide rubric and scores
- Singular ranking system may not be appropriate when contexts differ between jurisdictions



### Sets clear expectations for adequate plans and accommodations of housing needs

- Overly simplified assessment of progress. Actions necessary to improve score not immediately clear in grade.
- Cumulative grades allow for progress to be made on smaller actions to increase score, without progress on larger, potentially more challenging goals



### Assesses outputs and outcomes achieved on or after comprehensive plan adoption

- + If grades evaluate drivers, CPP reporting requirements will supply annual updates on plans and accommodations for scoring
- If grades incorporate housing outcomes, there will be major data lags (ACS data lags by two years; CHAS data lags by four); King County Income-restricted Housing Unit data lags by one) and data for scores will not be current



### Allows for the monitoring of equitable outcomes

- + Scores can prioritize actions focused on addressing housing disparities and equitable policymaking



## Target Setting

### Intent

Assess jurisdictional progress against annual targets, set by the Committee and published on the Regional Affordable Housing dashboard

### Options

Targets could be broken out by targets for plans and accommodations and targets for housing outcomes

Targets for plans and accommodations could include:

- **Zoning:** Zoning changes enacted to accommodate housing needs (% of changes enacted within a certain year or % of total needed capacity added)
- **Budget:** % of jurisdiction's budget dedicated to housing projects of various types (by tenure, AMI level, etc.)
- **Enacted Policies:** % of all policies committed to during plan review process enacted after certain number of years. The method could also account for policies not committed to but in alignment with countywide goals that are enacted.
- **Permitting Timelines:** maximum permitting timelines for income-restricted housing units

Targets for outcomes could include:

- Annual # of income restricted housing units created or preserved
- Changes in rates of cost burden
- Eviction rates
- Displacement risk

Similar to other options, targets could be divided by regional geography and/or size

### Example

No example



### Is feasible to implement and maintain

- The process to set annual targets would require substantial interjurisdictional collaboration, potentially over multiple years
- Jurisdictional contexts and markets are substantially different, complicating annual target setting



### Sets clear expectations for adequate plans and accommodations of housing needs

- + Targets provide clear expectations and definitions of progress over the planning period
- + Clear targets and the possibility of missing them may motivate jurisdictions to act quickly



### Assesses outputs and outcomes achieved on or after comprehensive plan adoption

- Targets likely to rely on "outcomes," for which there will be major data lags (ACS data lags by two years; CHAS data lags by four; King County Income-restricted Housing Unit data lags by one) and data for scores will not be current



### Allows for the monitoring of equitable outcomes

- + Targets can prioritize actions focused on addressing housing disparities and equitable policymaking