

Memo

To: King County Affordable Housing Committee Members
From: Isaac Horwith, Affordable Housing Planning Program Manager
cc: Housing Interjurisdictional Team
Date: September 15, 2023
Re: Comprehensive Plan Review Process Update

Purpose of September 21 AHC Meeting

At the September 21 Affordable Housing Committee (AHC) meeting, AHC staff will brief the AHC on proposed updates to the housing-focused comprehensive plan review process. AHC members should prioritize review of the proposed changes, highlighted in yellow in Exhibit 1, and prepare any questions or comments for discussion.

Background

AHC staff provided a briefing on the comprehensive plan review process at the June 15, 2023 AHC meeting. AHC staff outlined a tentative plan review schedule and shared proposed changes to the review process.

In July and August 2023, AHC staff conducted the comprehensive plan review process for King County and Redmond. AHC staff identified potential improvements to the plan review process during and after conducting those reviews. AHC staff presented and discussed potential process change with the AHC Chair, Vice-Chair, and Housing Interjurisdictional Team. Based on their feedback, AHC staff prepared the proposed changes to the plan review process in advance of the September 21 AHC meeting.

Overview of Updates to Comprehensive Plan Review Process

The most substantive changes to the plan review process increase communication between jurisdictions and AHC staff:

- AHC staff will schedule an intake meeting with jurisdiction staff and
- AHC Chair will share a preliminary draft comment letter with jurisdiction staff, requesting a review for mistakes or factual errors before deliberation at the next AHC meeting.

The update also:

- adds that the AHC Chair may defer action on a comment letter to allow AHC staff to prepare proposed comment letter amendments for AHC deliberation and potential action at a subsequent meeting; and
- increases the plan review timeline from two to four to two to five months to accommodate the potential increased dialogue between jurisdiction and the AHC staff and AHC Chair.

The proposed updates are subject to change as AHC staff continue to learn from early plan reviews and the AHC approval process.

What's Next

AHC staff are coordinating with jurisdictions scheduled to release public review drafts of their comprehensive plans. In 2024, the AHC will meet monthly to provide actionable and timely feedback and approval for the review of the remaining 38 jurisdiction's comprehensive plan public review drafts. As of now, only 11 jurisdictions (~27% of all jurisdictions in King County) have provided AHC staff with a submission date and most dates are tentative.

Exhibit 1: Housing-focused Comprehensive Plan Review Process

The Affordable Housing Committee’s (AHC’s) housing-focused comprehensive plan review process has four main stages:

1. AHC staff offer **technical assistance** to King County jurisdictions on alignment of comprehensive plans with the Countywide Planning Policies Housing Chapter policies;
2. jurisdictions **submit their public review drafts of comprehensive plans** to AHC staff for AHC review;
3. AHC staff review plans for alignment, prepare preliminary draft comment letters and the AHC reviews, potentially amends, and issues a **comment letter on plan alignment**; and
4. jurisdictions **incorporate AHC feedback** into plan and **adopt**.

Building upon the process AHC staff outlined for the Committee in a June 15, 2023 Comprehensive Plan Review Staff Report,¹ AHC staff made slight adjustments to the plan review process, in consultation with the HIJT and the AHC Chair and Vice-Chair.

The proposed process, below, is subject to change as AHC staff learn from early plan reviews and the AHC approval process. Process changes are highlighted in yellow.

1. Technical Assistance
<ul style="list-style-type: none"> • AHC staff provide technical assistance, including a plan review guidance document, resource guide for documenting the local history of racially exclusive and discriminatory housing and land use practices², and webinars on aligning plans with CPP Housing Chapter policies • Jurisdictions meet with AHC staff to discuss any plan review questions and review schedule
2. Submission
<ul style="list-style-type: none"> • Materials jurisdictions submit to the AHC include: <ul style="list-style-type: none"> ○ <u>Comprehensive plan public review draft</u>: A public review draft of the plan, inclusive of all elements ○ <u>Completeness Checklist</u>: A finished completeness checklist demonstrates that comprehensive planning policies address all CPP Housing Chapter policies and provides any supplementary details about plan status to the AHC (Standard 1) ○ <u>Draft Implementation Details</u>: For CPP Housing Chapter policies requiring jurisdictions to implement or adopt, jurisdictions must provide implementation details upon submission using the Implementation Details Workbook (Standard 2) ○ <u>Draft land use maps</u>: A draft PDF map of land use designations in the jurisdiction that reflect land use changes to be adopted in the periodic update • Jurisdiction submits materials before or concurrent with the release of a public review draft • AHC staff schedule an intake meeting for jurisdiction staff to highlight significant changes from previous plans and components AHC staff should pay particular attention to in their review

¹ Draft Comprehensive Plan Review Standards and Certification Pilot Staff Report, November 3, 2022 [\[link\]](#)

² Resources for Documenting the Local History of Racially Exclusive and Discriminatory Land Use and Housing Practices, May 2023 [\[link\]](#)

3. AHC Review (~2-45 months)

- AHC staff review draft plan and supplementary materials using plan review standards
- AHC staff meet with jurisdiction to discuss areas of concern and/or confusion following intake meeting or about two weeks after submission
- AHC staff draft preliminary comment letters and meet with AHC Chair and Vice Chair, who may edit the letter and determine whether any components of the letters should be placed on the consent agenda or for discussion. Jurisdictional staff are informed if their letter is pulled
- For submissions in 2023, AHC staff provide a preliminary comment letter to jurisdiction after Chair's review. Due to adoption timelines for jurisdictions releasing public review drafts and the infrequency of AHC meetings in 2023, AHC staff offered to share the preliminary draft comment letter with jurisdictions after meeting with the AHC Chair but before AHC review and approval.
- Chair shares a preliminary comment letter to jurisdiction and requests the jurisdiction staff review the letter for mistakes and factual errors
- AHC receives all preliminary comment letters up for review and meets to discuss letters. Members can pull letters for discussion in case of concerns or questions
- AHC potentially approves comment letter. AHC Chair may defer action for AHC staff to draft proposed amendments for AHC deliberation and action at subsequent meeting.
- After AHC approves letter, Chair or designee sends final letters to jurisdictional staff. AHC staff post final letter online

4. Revision and Plan Adoption

- Jurisdictions edit plan in response to AHC letter
- Jurisdictions submit new implementation details to AHC staff after adoption if plan policies or implementation details change during adoption process