

Memo

To: King County Affordable Housing Committee Members
From: Isaac Horwith, Affordable Housing Planning Program Manager
cc: Housing Interjurisdictional Team
Date: November 9, 2023
Re: Comprehensive Plan Review Program Update

Summary

At the November 16 Affordable Housing Committee (AHC) meeting, AHC staff will provide a brief update on the work of the housing-focused draft comprehensive plan review program (plan review program) since the September 21, 2023 AHC meeting, and AHC staff's anticipated work on the plan review program through the first quarter of 2024.

Background

At the September 21 meeting, AHC staff briefed the AHC on the draft comment letters for King County and Redmond's draft comprehensive plans and proposed process changes to the plan review program. The AHC approved the King County and Redmond comment letters.

In response to the staff briefing on the proposed process changes and draft 2024 work plan, AHC members expressed concerns about difficulty reviewing and providing meaningful feedback on comment letters, as:

- the AHC must review and comment on 38 draft plans by the end of 2024, which is too many to discuss in-depth during committee meetings and
- most AHC members are not planning experts and may not understand the more technical suggestions or recommendations in a comment letter.

In February 2023, AHC staff began developing a guide to help jurisdiction staff understand the plan review program. The Housing Interjurisdictional Team (HIJT) has reviewed and provided feedback on two versions, in July and October 2023.

Peer Review Pilot

In response to AHC member feedback, AHC staff recommend piloting a new peer review component with the next batch of plans submitted for review. The purpose of peer review is to:

- improve each jurisdiction's comment letter by providing an additional perspective from a local jurisdiction and
- increase trust from AHC members that the comment letters have been adequately vetted. This could lead to more comment letters slated for a consent agenda, resulting in faster review and approval by the AHC.

After AHC staff draft a preliminary comment letter, they will share the letter and submission materials with a HIJT member. The HIJT member will review the letter and submission materials, provide feedback, and potentially recommend components for AHC discussion. HIJT members will

not be expected to review the entire draft plan. AHC staff estimate a HIJT member will spend about five hours on each submission.

At the end of the pilot, AHC staff will recommend to the AHC whether to continue peer review or make further adjustments.

Housing-Focused Draft Comprehensive Plan Review Guide and Other Resources

The purpose of the housing-focused draft comprehensive plan review guide (plan review guide or guide) is to help jurisdictions understand and navigate the AHC's plan review program. The draft guide includes:

- a brief overview of the planning framework for jurisdictions in King County,
- the steps in the plan review process and tasks for jurisdictions,
- an explanation of the plan review standards approved by Growth Management Planning Council (GMPC) [Motion 23-2](#) and AHC staff's approach to implementing them,
- an example framework to evaluate the meaningfulness of plan responses to Countywide Planning Policies (CPPs) Housing Chapter policies,
- links to resources, primarily from King County, Puget Sound Regional Council, and the Washington State Department of Commerce, to help jurisdictions as they develop their comprehensive plans, and
- the CPP Completeness Checklist,

AHC staff are still developing:

- an engrossed version of the CPPs for jurisdictions to reference that reflect the amendments approved by King County [Ordinance 19660](#) and
- the implementation strategies workbook, a component of the submission materials for jurisdictions to complete.

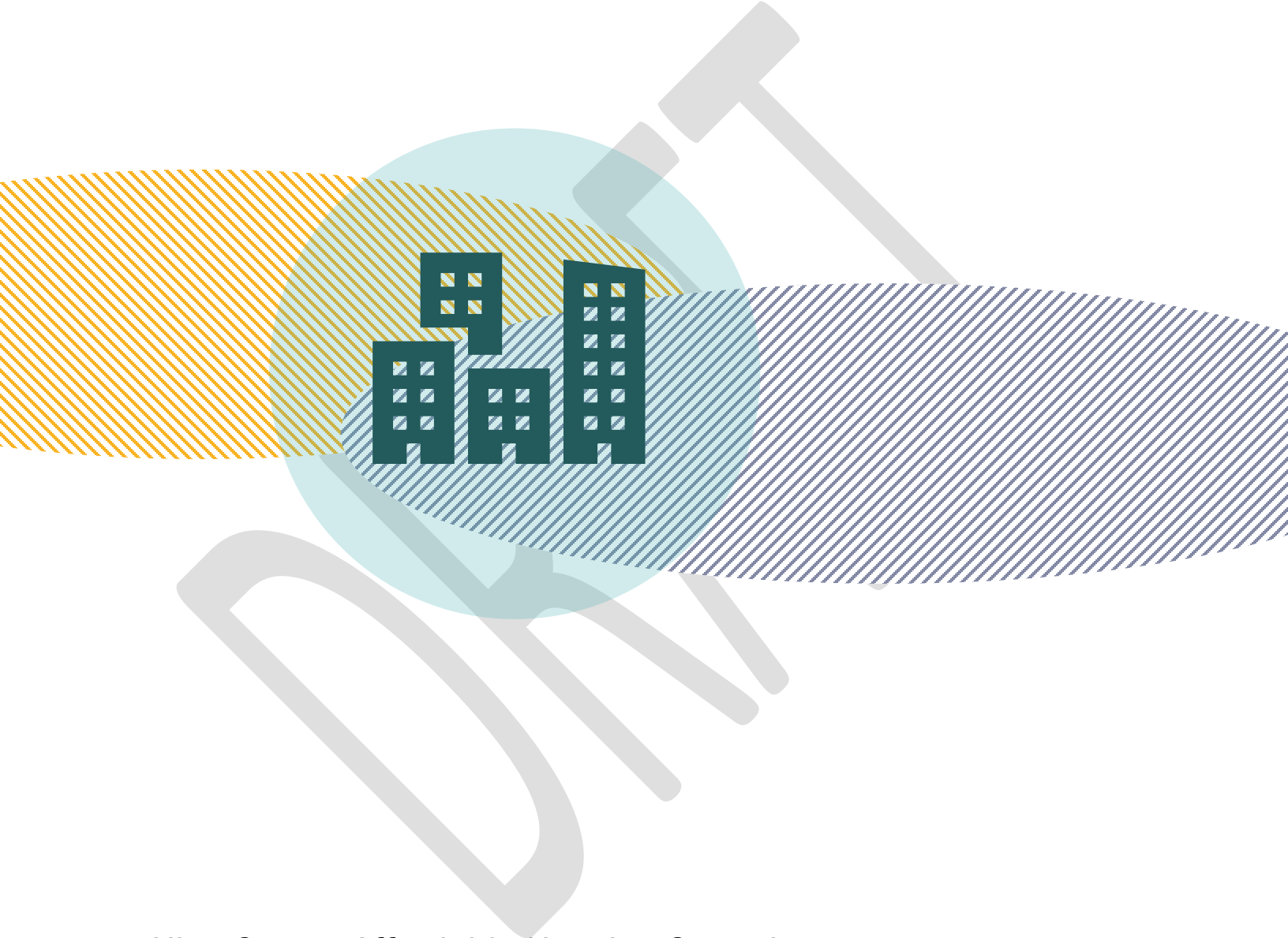
What's Next

AHC staff anticipate receiving submissions to the plan review program from three to five jurisdictions either this year or during the first quarter of 2024.

AHC staff will post the draft guide on the AHC website about a week after the November 16 AHC meeting. AHC staff will post the engrossed CPPs and implementation strategies workbook on the AHC website by the end of 2023. AHC anticipate maintaining the draft status of the guide and implementation strategies workbook until about the end of the first quarter of 2024 to allow for adjustments informed by the next round of plan review.

AHC staff and HIJT members will move forward with the peer review pilot through the first quarter of 2024. AHC staff will assess the effectiveness of peer review and recommend whether to continue this step.

Exhibit 1: Housing-focused Draft Comprehensive Plan Review Guide



King County Affordable Housing Committee Housing-Focused Draft Comprehensive Plan Review Guide

November 2023

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Introduction

[The Affordable Housing Committee \(AHC\)](#) is implementing a housing-focused draft comprehensive plan review program (plan review program), as established by the King County Countywide Planning Policies (CPP) Housing Chapter Policy H-26. The purpose of the program is to:

- a) offer early guidance and assistance to jurisdictions on comprehensive plan alignment with the CPP Housing Chapter;
- b) ensure plans address all Housing Chapter goals and policies and include required analyses;
- c) evaluate the meaningfulness of public review draft comprehensive plan responses to policies in this chapter, where meaningful responses can be reasonably expected to achieve a material, positive change in the jurisdiction's ability to meet housing needs; and
- d) collect data on jurisdictional implementation details to inform future AHC and Growth Management Planning Council (GMPC) monitoring and evaluation during the remainder of the planning period.

This guide details the process and standards used by the AHC for comprehensive plan review and provides resources for jurisdictions as they draft comprehensive plan updates. This guide is a working document and may be updated to incorporate lessons learned and feedback received during the review of draft plans. At a high level:

- AHC staff are available to provide technical assistance as jurisdictions draft their comprehensive plans and materials for AHC review;
- Jurisdictions submit the housing-related components of their draft comprehensive plan, a draft land use map, a completeness checklist, and an implementation strategies workbook for review;
- Jurisdictions will receive a comment letter on how their draft plan aligns with the CPP Housing Chapter that may include recommendations or suggestions to improve alignment; and
- Jurisdictions will incorporate feedback and adopt their plan.

The AHC recognizes jurisdictions in King County are working to comply with many new requirements for the 2025-2034 comprehensive planning period. Jurisdictions may face challenges submitting public review draft plans to the AHC early enough to receive and incorporate feedback. The AHC may not approve a comment letter with enough time for the jurisdiction to address the AHC's recommendations before the state-mandated deadline. **AHC staff are committed to working collaboratively with jurisdiction staff and providing flexibility whenever feasible.**

The AHC also understands jurisdictions face significant and structural barriers to meeting their housing needs over the planning period, including:

- Housing needs for the lowest-income households are unlikely to be met without significant new funding for income-restricted housing.
- Shifts in housing markets and the economy can occur unexpectedly, driven by forces outside of a jurisdiction's control.

Jurisdictions can adopt policies that advance CPP Housing Chapter goals, but successful implementation may require resources and involvement from other levels of government, nonprofits, philanthropy, and the private sector.

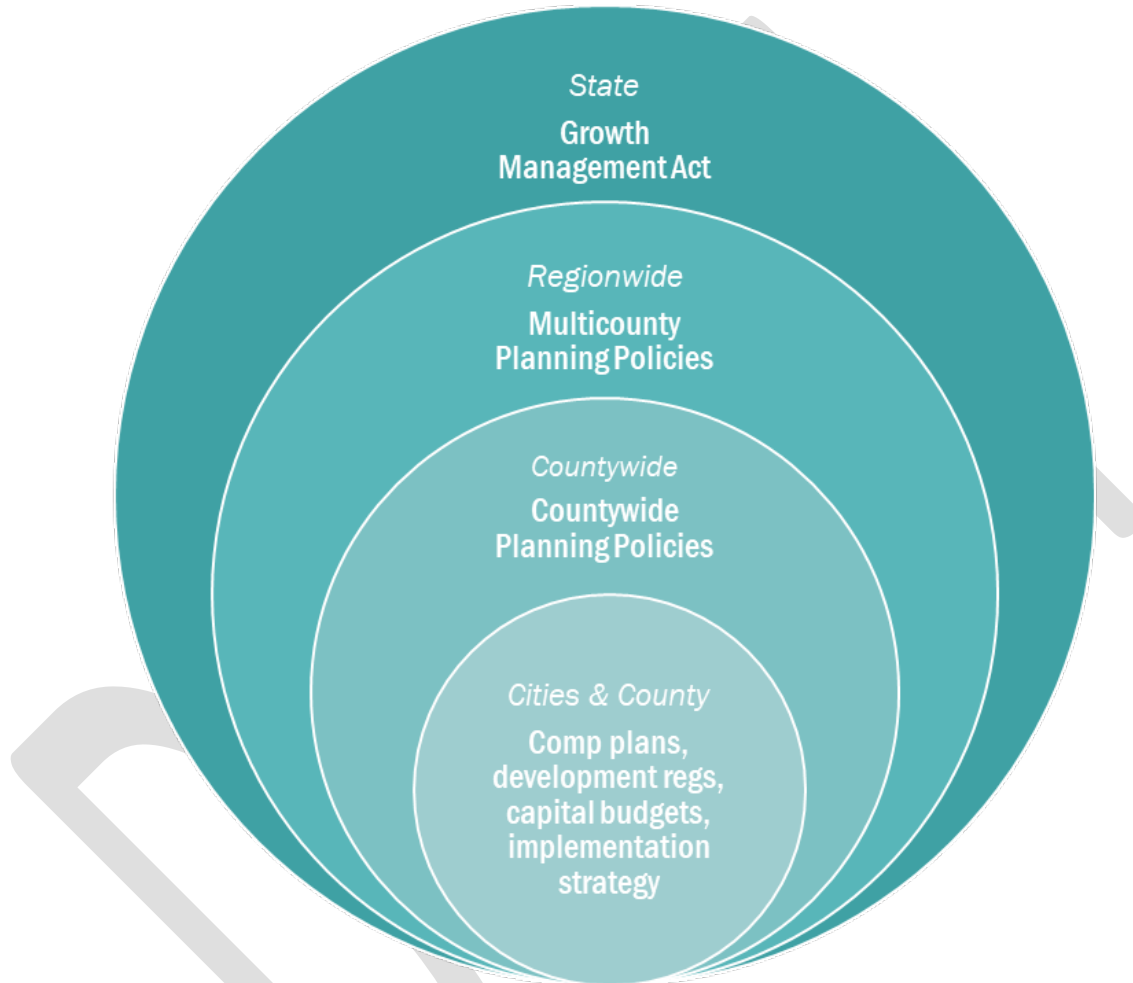
At the same time, jurisdictions have direct control over many of the most important tools needed to meeting King County’s housing needs. Policy and code changes can have a major impact on their own towards meeting a jurisdiction’s housing needs. Policies that guide investments are also critical to ensuring the resources that are deployed are done so effectively. Taking into consideration each jurisdiction’s unique needs and capabilities, the AHC will provide constructive feedback meant to improve local processes and approaches aimed at improving affordable housing outcomes.

Local jurisdictions are a critical partner for addressing the region’s housing crisis. Together, local jurisdictions, the AHC, and other partners can remove barriers and implement new strategies to support affordable, accessible, and healthy housing choices for current and future residents across King County.

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Planning Framework

In Washington State, jurisdictions use comprehensive plans to plan for and accommodate the housing needs of current and future residents. Multiple levels of government help guide the comprehensive planning process:



- The Washington State [Growth Management Act \(GMA\)](#) establishes a framework for comprehensive planning statewide (RCW 36.70A).¹
- The Puget Sound Regional Council's (PSRC) VISION 2050 sets [Multicounty Planning Policies \(MPPs\)](#) between King, Pierce, Snohomish, and Kitsap counties to align regional planning efforts.
- The [King County Countywide Planning Policies \(CPPs\)](#) guide local planning in King County. The CPPs are developed by the County and cities through the Growth Management Planning Council (GMPC). The GMPC recommends the CPPs and subsequent amendments for approval by the King County Council. After King County Council approval and ratification, the CPPs or amendments must be ratified by jurisdictions representing at least 70 percent of King County's

¹ In 2021, HB 1220 significantly amended housing planning requirements under the Growth Management Act. The Washington Department of Commerce provides information on these new requirements on [their website](#).

population and 30 percent of the jurisdictions in King County within 90 days, as established by CPP Vision and Framework Chapter Policy FW-1.

King County and the 39 cities in King County must review and revise their **comprehensive plans** every ten years.² Under the Growth Management Act, a jurisdiction's activity and capital budget decisions must be made in conformity with its comprehensive plan.³ Jurisdictions should also develop a strategy for implementing their comprehensive plan that describes the regulatory and nonregulatory measures to be used to implement the comprehensive plan and identify the development regulations needed.⁴

For the upcoming 2025-2034 planning period, jurisdictions in King County must adopt a periodic update to their comprehensive plan by December 31, 2024. **All King County jurisdictions should participate** in the AHC's housing-focused comprehensive plan review program, as established by CPP H-26, which is intended to support jurisdictions in strengthening alignment of their comprehensive plans with the CPP Housing Chapter during the periodic update process.

² [RCW 36.70A.130](#)

³ [RCW 36.70A.120](#)

⁴ [WAC 365-196-650](#)

Comprehensive Plan Review Process

The AHC’s comprehensive plan review process starts with early collaboration between jurisdiction staff and AHC staff **before a jurisdiction releases a public review comprehensive plan draft**. It ends with jurisdictional adoption of comprehensive plans by or before December 31, 2024. The process has **four main stages**:



The following section provides guidance and outlines key jurisdictional tasks at each step.

I. Technical Assistance and Prepare for Plan Review

Jurisdiction Key Tasks	AHC Key Tasks
<ul style="list-style-type: none"> Review AHC comprehensive plan review technical assistance resources Reach out to AHC staff for consultation and questions Inform AHC staff of the anticipated release date of the comprehensive plan public review draft Prepare submission materials 	<ul style="list-style-type: none"> AHC staff available for technical assistance

Jurisdiction staff are encouraged to explore the following resources for guidance on aligning comprehensive plans with the CPP Housing Chapter:

- **King County Countywide Planning Policies**
 - Housing Chapter, pages XX-XX
 - Appendix 4: Housing Technical Appendix, pages XX-XX
- [Resources for Documenting the Local History of Racially Exclusive and Discriminatory Land Use and Housing Practices](#) (for alignment with CPP H-5 and H-9)
- [Regional Affordable Housing Dashboard](#) – See the “Jurisdictional Snapshot” section of this dashboard for data on income-restricted housing in the jurisdiction, rates of cost burden broken out by racial and income categories, among other housing data

Jurisdiction staff should contact AHC staff at AHCplanreview@kingcounty.gov as early as possible to share anticipated release dates for comprehensive plan public review drafts. AHC staff are also available to meet and respond to questions about CPPs and the plan review process.

II. Submit Materials

Jurisdiction Key Tasks	AHC Key Tasks
<ul style="list-style-type: none"> • Prior to or concurrent with release of the public review draft, submit: <ul style="list-style-type: none"> ○ housing-related components of the draft comprehensive plan; ○ draft land use map; ○ completeness checklist; and ○ implementation strategies workbook. • Meet with AHC staff for intake meeting • Work with AHC staff to set review schedule and date for AHC plan review 	<ul style="list-style-type: none"> • AHC staff schedule intake meeting

The AHC will review and comment on public review drafts to give jurisdictions and the AHC time to compile and respond to feedback in advance of jurisdictions submitting for PSRC and state agency reviews at least 60 days before scheduled adoption.

Materials for submission include:

- **Housing-related components of draft comprehensive plan**
Attach or link to a digital copy of the housing-related components of the public review draft of the plan, inclusive of all elements and relevant draft appendices and analysis. This includes the housing element and any other components central to demonstrating consistency with all the CPP Housing Chapter policies.

- **Draft land use map**
Attach or link to a digital copy of a map that reflects proposed land use changes. A pdf of the map is preferred.
- **CPP completeness checklist**
Fill out and attach a [completeness checklist](#) to guide and inform AHC staff review. Please submit this as a Word file.
- **Draft implementation strategies workbook**
Fill out and attach an [implementation strategies workbook](#) to demonstrate consistency with CPP Housing Chapter policies that state “implement” or “adopt.” Please submit this as an Excel file.

Jurisdiction staff can email materials to AHC staff at AHCplanreview@kingcounty.gov. Upon submission, AHC staff will confirm the receipt of materials.

Following receipt, AHC staff will schedule an intake meeting with jurisdiction staff. Jurisdiction staff should be prepared to highlight plan components AHC staff should pay particular attention to in their review.

III. AHC Review and Comment Letter Approval and Issuance

Jurisdiction Key Tasks	AHC Key Tasks
<ul style="list-style-type: none"> • Meet with AHC staff after their initial review to answer clarifying questions and provide additional context • Review preliminary draft comment letter for factual errors 	<ul style="list-style-type: none"> • AHC staff conduct initial review • AHC staff meet with jurisdiction staff after initial review • AHC staff draft comment letter • AHC Chair shares preliminary draft comment letter with jurisdiction staff • AHC approves comment letter

The AHC’s review takes **two to five months** from submission to AHC issuance of a plan review comment letter.

During the review process, AHC staff use **housing-focused comprehensive plan review standards** to evaluate plans’ alignment with the CPPs and inform comment letters. For guidance on how to align with comprehensive plan review standards, see the [Aligning with Comprehensive Plan Review Standards](#) section of this guidance.

Before AHC staff draft comment letters, AHC staff will meet with jurisdiction staff twice: at initial intake and then again to discuss any initial concerns or confusion with the plan.

AHC staff will then complete their review and draft a comment letter.

Plan review comment letters:

- Confirm the completeness of housing-related components of draft comprehensive plans (see [plan review standards 1 and 2](#));
- Provide an assessment of draft plan meaningfulness and how plan elements advance CPP Housing Chapter goals (see [plan review standard 3](#)); and
- Highlight particularly meaningful components, recommend changes necessary to align with the CPP Housing Chapter, and suggest changes to strengthen alignment with the CPP Housing Chapter.

A member of the Housing Interjurisdictional Team, a jurisdictional staff work group that supports the AHC, will review the submission materials and provide feedback on the draft letter.

Then, the AHC Chair will review the letter and share a preliminary version with jurisdiction staff, requesting the jurisdiction staff review the letter for factual errors. The Chair will determine which comments are pulled for discussion by the AHC and which should be placed on the consent agenda.

Following this, AHC staff will circulate and post online the draft letters, the consent agenda, and plan review submission materials to the AHC at least four business days before an AHC meeting. At the meeting, AHC members may pull additional comments for discussion. Following AHC deliberation, members may possibly amend and approve the comment letter.

IV. Incorporate AHC Feedback and Adopt Plan

Jurisdiction Key Tasks	AHC Key Tasks
<ul style="list-style-type: none">• Once the AHC approves and issues the letter, jurisdiction staff review the letter and address feedback provided• Jurisdiction legislative body adopts the comprehensive plan prior to or by the state-mandated December 31, 2024 deadline• After comprehensive plan adoption, jurisdiction staff update and submit to AHC staff revised implementation strategies workbook to align with the adopted comprehensive plan	<ul style="list-style-type: none">• AHC Chair emails final comment letter to jurisdiction• AHC staff post the final comment letter on AHC website

Following AHC approval of the letter, the AHC Chair will email the final comment letter to the jurisdiction staff who submitted the plan and AHC staff will post the letters online. AHC staff will endeavor to review public review drafts and submissions in a timely fashion. The AHC comment letter will acknowledge if the letter is delayed or approved with no time for the jurisdiction to incorporate feedback.

Jurisdiction staff are then encouraged to review the AHC's comments and work with their city councils, planning commissions, or other collaborators to revise their draft comprehensive plans to align with the recommendations and suggestions. Jurisdictional councils should adopt the comprehensive plan by the state-mandated December 31, 2024 deadline.

The AHC's review is the first step in an accountability framework for the housing-related components of local comprehensive plans established in the CPPs:

- H-27 establishes annual monitoring and reporting requirements for the County and local jurisdictions;
- H-28 directs the County to provide information on jurisdictions' progress using public-facing tools; and
- H-29 directs the GMPC or its designee to review monitoring and reporting data and identify significant shortfalls.

The [2021 Countywide Planning Policies](#), as amended in 2023 by King County Ordinance 19660, include the complete policies and additional information in the Housing Technical Appendix (Appendix 4).

Note that AHC staff will use the implementation strategies submitted during the plan review process to track jurisdictional progress on implementing an adopted comprehensive plan over the course of the planning period. If plan policies or implementation strategies change after submitting to this program, jurisdiction staff should send updated implementation strategies to AHC staff to reflect the changes after the plan is adopted. This step will ensure that the AHC provides an evaluation of jurisdictional progress based on finalized implementation strategies and plan policies. AHC staff will work with the jurisdiction through the monitoring and reporting and mid-point review processes as established by CPPs H-27 and H-29 to understand any progress to update the plan or implement policies to align with the AHC's comment letter.

Aligning with Comprehensive Plan Review Standards

This section provides details about the comprehensive plan review standards and how AHC staff will evaluate jurisdictions' submissions using these standards. These standards were approved by [GMPC Motion 23-2](#).

Standard 1 | Plan Completeness

STANDARD 1

The plan policies and related appendices evidently address all CPP Housing Chapter policies.

The housing-related components of a public review draft comprehensive plan submitted for the AHC's review should be consistent with all CPP Housing Chapter policies.

To facilitate the AHC's review, jurisdiction staff should complete and submit a [CPP Completeness Checklist](#) with their draft plan, which can be found in the appendix of this guidance. In the checklist, staff should list the comprehensive plan policy or appendices that address each CPP Housing Chapter policy and provide page numbers to guide AHC staff as they review the plan. Jurisdiction staff completing the checklist can submit additional information for reviewers to consider in the "notes" column of the checklist. This could include explanations of how the final plan will address unfinished plan elements and/or unaddressed CPPs Housing Chapter policies.

See the [2021 King County Countywide Planning Policies](#), as amended in 2023 by King County Ordinance 19660, for the full text of the CPP Housing Chapter.

Standard 2 | Implementation Strategies

STANDARD 2

The plan or related appendices articulate implementation strategies for Housing Chapter CPPs requiring policy adoption and/or implementation: H-1, H-2, H-9, H-10, H-12, H-13, H-14, H-15, H-16, H-17, H-18, H-19, H-20, H-21, H-22, H-23, H-24, and H-25. Implementation strategies should identify:

- a) the regulatory or non-regulatory measures to be used to implement goals and policies used to address CPP Housing Chapter policies; and
- b) an adoption schedule for measures.

As part of plan review submittal, jurisdiction staff should:

- provide the AHC with implementation strategies for CPP Housing Chapter policies H-1, H-2, H-9, H-10, H-12, H-13, H-14, H-15, H-16, H-17, H-18, H-19, H-20, H-21, H-22, H-23, H-24, and H-25, all of which require jurisdictions adopt and/or implement specific policies to accommodate housing needs and advance CPP Housing Chapter goals.
- articulate regulatory and non-regulatory measures necessary to implement the comprehensive plan policy.

- include a timeline of anticipated adoption.⁵ For timelines, jurisdiction staff can indicate the anticipated year of adoption or use ranges (e.g., “short-term”), as long as the ranges are defined (e.g., “short-term” means one to three years).

To facilitate review, jurisdiction staff should include a completed [Implementation Strategies Workbook](#) in their submission materials. Implementation measures provided in this workbook should be concise and action-oriented. If needed, jurisdictions may accompany implementation strategies with notes for AHC reviewer consideration.

The workbook includes example implementation strategies. Additional examples of potential measures to implement policies responsive to CPP Housing Chapter policies can be found in [Table H-3 in the CPP Appendix 4: Housing Technical Appendix](#) and in the Resource section in this guide.

The AHC will use the implementation strategies to evaluate jurisdictional progress on comprehensive plan implementation. The AHC will develop and finalize specifics on how implementation progress will be reported after reviewing the information collected during the first year the AHC collects data for annual monitoring. For updates on this process, refer to AHC staff reports on annual monitoring and comparative standard development on the AHC’s [“Meetings and Membership” page](#).

Jurisdiction staff should **provide updated implementation strategies** to AHC staff within three months of plan adoption for use in annual monitoring. Please email updated strategies to AHCplanreview@kingcounty.gov.

Standard 3 | Meaningful Plan Responses to CPP Housing Chapter

STANDARD 3

The plan lays out meaningful policies that, taken together, support the jurisdiction’s ability to equitably meet housing need by promoting:

- a. equitable processes and outcomes;
- b. increased housing supply, particularly for households with the greatest needs;
- c. expanded housing options and increased affordability accessible to transit and employment;
- d. expanded housing and neighborhood choice for all residents;
- e. housing stability, healthy homes, and healthy communities; and
- f. a commitment to continuous improvement through implementation, monitoring, and adjustment.

Once the AHC reviews a plan for completeness and accompanying implementation strategies, reviewers will evaluate the meaningfulness of plan responses to CPP Housing Chapter policies. Per CPP H-26, meaningful plan responses to CPP Housing Chapter policies can be reasonably expected to achieve a material, positive change in the jurisdiction’s ability to meet housing needs over the planning period.

AHC staff created a framework (Table 1) to help jurisdiction staff understand and articulate how their plan meaningfully supports the jurisdiction’s ability to equitably meet housing needs. Use of this tool is optional.

⁵ [WAC 365-196-650](#)

Qualities for meaningful plan responses to the CPP Housing Chapter include, but are not limited to:

Allocated countywide housing needs guide land use changes and other strategies

Policy H-1 allocates the jurisdiction’s share of countywide housing need, broken out into 0 to 30 percent, 31 to 50 percent, 51 to 80 percent, 81 to 120 percent, and greater than 120 percent area median income bands and emergency housing needs. After conducting a land capacity analysis, as outlined by the Department of Commerce⁶, jurisdiction staff should use allocated countywide housing needs as the basis for land use changes proposed in the comprehensive plan. Likewise, programmatic commitments outlined in a jurisdiction’s plan should be reasonably expected to support the jurisdiction’s ability to meet needs over the planning period.

Strong analysis of needs, gaps, and barriers that inform policies and implementation strategies

CPPs H-3, H-4, and H-5 require jurisdictions conduct analysis meant to inform the comprehensive plan update process. Jurisdictions should refer to CPP Appendix 4 and [the resource section](#) of this guidance for best practices in completing required CPP Housing Chapter analyses.

The AHC will be more likely to consider a submission meaningful if it clearly demonstrates:

- how policies are informed by the housing needs, gaps, and barriers identified and
- how the implementation strategies are likely to have a meaningful impact on the jurisdiction’s ability to implement its policies.

Committed and action-oriented language in policies and implementation strategies

To convey plan meaningfulness, policy and implementation strategies language should avoid ambiguous words that do not demonstrate a clear commitment to implementation or positive, material change. For example:

- Use the word “shall” when committing to future actions (City X *shall* pass policy/measure A) where possible. “Shall” demonstrates a stronger commitment to a stated action in a legal context than other intention-setting words such as “should.”
- Avoid words like “consider” or “encourage,” unless followed by a concrete action or commitment. Neither word demonstrates a strong or clear commitment to action.

Strong and consistent equity focus

The CPP Housing Chapter sets an overarching goal that all jurisdictions “take actions that eliminate race-, place-, ability, and income-based housing disparities.” Meaningful plan responses to CPP Housing Chapter policies should result in policies and implementation strategies to meet housing needs in a manner that focuses on households with the greatest needs. For guidance on crafting equitable housing plans, see CPP Appendix 4 and [the resources section](#) of this guide.

Policies work together, not against each other

Before submitting plans for review, jurisdiction staff should ensure that plan policies do not advance some CPP Housing Chapter goals at the expense of others. For example, upzoning in an area at high risk of displacement to accommodate designated housing needs would likely undermine policies related to displacement if the upzones weren’t adopted with complementary anti-displacement

⁶ Washington State Department of Commerce, [“Guidance for Updating Your Housing Element”](#) Chapter 3: Land capacity analysis, page 16.

measures. During review, the AHC would highlight this contradiction and suggest ways to alleviate displacement risk while also accommodating new housing growth.

Demonstrated intention for material, positive change

Comprehensive plans should demonstrate a clear commitment to improving how a jurisdiction plans for and accommodates housing need over the planning period. Given ongoing housing disparities, the AHC recognizes that current planning in King County is insufficient to meet the level of need. Meaningful plans will recognize gaps in the jurisdiction's current approach to meeting housing needs and propose policies that demonstrate a clear intention to achieving material, positive change.

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Table 1: Example Framework to Evaluate Meaningful Responses

This table provides a logic framework a jurisdiction could use to understand how their housing-related analysis, policies, and implementation strategies meaningfully support their ability to equitably meet housing needs. Jurisdictions are **not required** to use or submit this framework to the AHC for review.

Need, Gap or Barrier Identified	Comprehensive Plan Policy	Implementation Strategies	Expected Positive, Material Change
<p><i>Example:</i></p> <p>Madrone City’s Housing Needs Assessment finds its existing density incentive program has only been used a few times, resulting in few new income-restricted housing units.</p>	<p><i>Example:</i></p> <p>Policy: Madrone City shall provide density bonuses and other incentives for the development of affordable housing. Bonuses shall be periodically reviewed and updated, as needed, to ensure they are effective in creating affordable housing units</p>	<p><i>Example:</i></p> <p>Ongoing measure: Madrone City staff will prepare code changes to improve the existing density incentive program with the 2024 Comprehensive Plan. The update will require some income-restricted units in projects in commercial areas and in areas with transit options for commuters to access major employment centers.</p>	<p><i>Example:</i></p> <p>Madrone City identifying and addressing a gap in its existing density incentive program will improve the city’s ability to provide options desirable to developers, addressing CPP H-12: “Adopt and implement policies that improve the effectiveness of existing housing policies and strategies and address gaps in partnerships...”</p> <p>The mandatory component of Madrone City’s inclusionary housing program meaningfully addresses CPPs H-15: “Increase housing choices...”; H-16: “Expand the supply and range of housing types, including affordable units, at densities sufficient to maximize the benefits of transit investments throughout the county”; and H-18: “Adopt inclusive planning tools and policies whose</p>

Need, Gap or Barrier Identified	Comprehensive Plan Policy	Implementation Strategies	Expected Positive, Material Change
			purpose is to increase the ability of all residents in jurisdictions throughout the county”
<p><i>Example:</i></p> <p>Madrone City’s Housing Needs Assessment finds and residents shared that renters are significantly more likely to be cost burdened and face unique barriers in maintaining stable, affordable, accessible, and healthy housing.</p>	<p><i>Example:</i></p> <p>Policy: Cooperate with ARCH, King County, the King County Housing Authority, and social and health service agencies to further housing stability for renters by:</p> <ul style="list-style-type: none"> • advocating for state-level eviction reforms and tenant protections; • adopting and maintaining equitable tenant protections; • tracking landlord and property manager compliance with fair housing laws and provide technical assistance to landlords and property managers; • providing tenant rights education in multiple languages; and • exploring other tools and opportunities to increase housing stability for renters. 	<p><i>Example:</i></p> <p>New measure: Madrone City staff will provide public communications supporting implementation of comprehensive plan policies in multiple languages and accommodate interpretation needs.</p> <p>New measure: Madrone City will provide funding for greater fair housing education and enforcement efforts, in coordination with other cities in the region, to track compliance with fair housing laws and provide technical assistance and education to landlords and property managers of local residential properties.</p> <p>New Measure: Madrone City staff will explore potential new tenant protection policies through a literature and policy review and community engagement.</p>	<p><i>Example:</i></p> <p>Working with regional partners will improve Madrone City staff’s knowledge and capacity to support affordable housing, meaningfully addressing CPP H-7: “Work cooperatively with PSRC, subregions, and other entities”</p> <p>Funding fair housing education and enforcement, in coordination with other cities, will increase Madrone City staff understanding and capacity to address fair housing issues. Additionally, reducing language and other barriers for renters to access resources and defend their rights will increase housing stability for limited English proficiency and other low-income households, meaningfully addressing CPPs H-22: “Implement, promote, and enforce fair housing policies and practices so that every person in the county has equitable access and opportunity to thrive in their</p>

Need, Gap or Barrier Identified	Comprehensive Plan Policy	Implementation Strategies	Expected Positive, Material Change
			<p>communities of choice, regardless of their... membership in any... category of protected people” and H-23: “Policies that protect housing stability for renter households “</p>
<p><i>Example:</i></p> <p>Madrone City’s Housing Needs Assessment identifies a gap in Madrone City’s code that makes it challenging or confusing for staff to understand how to permit emergency and permanent supportive housing.</p>	<p><i>Example:</i></p> <p>Policy: Madrone City shall encourage development of permanent supportive, emergency, and other affordable housing.</p>	<p><i>Example:</i></p> <p>New measure: Madrone City staff will prepare code changes to reduce barriers and provide clarity for permitting permanent supportive and emergency housing with the 2024 Comprehensive Plan.</p>	<p><i>Example:</i></p> <p>Madrone City’s proposed code changes will create clarity for permitting staff and facilitate development of permanent supportive and emergency housing, addressing, allowing it to accommodate the needs allocated in CPP H-1.</p>
<p><i>Example:</i></p> <p>Madrone City’s equity-focused community work group and local residents shared concerns about ongoing displacement of residents in BIPOC communities who have lived in the area for generations.</p> <p>Madrone City’s documentation of the local history of racially exclusive</p>	<p><i>Example:</i></p> <p>Policy: Madrone City shall take actions to prevent and mitigate residential and cultural displacement for communities at risk of displacement to address racially disparate outcomes in housing and help protect cultural communities for Black, Indigenous, and People of Color by supporting cultural institutions, community hubs, and using community preference</p>	<p><i>Example:</i></p> <p>Ongoing measure: Implement the recommendations of the Madrone City Anti-displacement Strategies Report, including:</p> <ul style="list-style-type: none"> - inclusionary housing - community preference program - preserving manufactured housing communities - supporting community land trusts and other equitable development efforts 	<p><i>Example:</i></p> <p>The combination of the community preference and inclusionary housing programs will provide Madrone City a tool to directly mitigate displacement, addressing CPPs H-9: “Adopt intentional, targeted actions that repair harms to Black, Indigenous, and People of Color...” and H-21: “Adopt policies and strategies that promote</p>

Need, Gap or Barrier Identified	Comprehensive Plan Policy	Implementation Strategies	Expected Positive, Material Change
<p>and discriminatory land use and housing practices finds that its predominantly single-family zoning has a discriminatory effect by excluding lower-income households, which are more likely to be BIPOC, from areas of opportunity.</p>	<p>programs for affordable housing that helps people with a connection to the local community remain in or return to their community of choice.</p> <p>Policy: Madrone City shall ensure that there is sufficient zoned capacity to accommodate its housing need allocations and provide a range of affordable, climate resilient housing types, including higher-density single-detached homes, duplexes, triplexes, fourplexes, townhouses, apartments, manufactured housing, cottage housing, accessory dwelling units, and mixed-use developments.</p>	<p>Ongoing measure: Madrone City is providing land at no cost and financial and technical assistance to community-based organizations for the development of affordable housing and community space.</p>	<p>equitable development and mitigate displacement risk, with consideration given to the preservation of historical and cultural communities...”</p> <p>Investing in and supporting cultural facilities mitigates cultural displacement, also addressing CPP H-21.</p>

Resources

Consultations

- To schedule a preparation meeting with AHC staff, email AHCplanreview@kingcounty.gov

Support to Align with CPP Housing Chapter

- **2021 King County Countywide Planning Policies, including:**
 - Housing Chapter
 - Appendix 4: Housing Technical Appendix
- [Resources for Documenting the Local History of Racially Exclusive and Discriminatory Land Use and Housing Practices](#)
- [Regional Affordable Housing Dashboard](#). See the “Jurisdictional Snapshot” section of this dashboard for data on income-restricted housing in each jurisdiction, rates of housing cost burden broken out by racial and income categories, among other housing data.

Housing Planning Resources

Puget Sound Regional Council Resources

- [VISION 2050 Planning Resources Housing Element Guide](#) – a resource for developing effective comprehensive plan housing elements that address housing choice and affordability
- [Regional Housing Strategy](#) - a “playbook” of regional and local actions to preserve, improve, and expand housing stock in the region
- [Housing Innovations Program](#) – tools and strategies to promote more housing options and affordability locally
- [Housing Incentives and Tools Survey](#) – a report summarizing the findings of a 2022 survey of local jurisdictions to learn how regulatory incentives and tools are used
- [Housing Opportunities by Place](#) – typology used to classify strategies and tools that effectively address housing access and affordability
- [Housing Affordability in the Central Puget Sound Region](#) – infographic exploring factors that impact housing affordability and the impacts of rising housing costs on households
- [Racial Residential Segregation](#) – resource explores residential settlement patterns across the region by race and explores causes of racial residential segregation
- [Displacement risk mapping tool](#) and [interactive report](#) identifies areas where residents and businesses are at greater risk of displacement

Washington State Department of Commerce Resources

- [Guidance for Updating your Housing Element \(Book 2\), including Appendix B: Adequate provisions checklists \(Word\)](#) – guidance for jurisdictions in updating their comprehensive plans and regulations with the new statewide housing requirements
- [Guidance to Address Racially Disparate Impacts](#) (Book 3) – guidance on how to integrate new racially disparate impacts requirements into housing element updates

- [Washington State Department of Commerce Housing Planning Guidance](#) – information on guidance on compiling with amendments to the Growth Management Act from HB 1220.
- [Updating GMA Housing Elements](#) – guidance on planning for housing under the GMA, including the new requirements established by 2021 House Bill 1220
- [Planning for Housing](#) – information on Commerce grants, guidance, and links to other housing pages

Other Housing Planning Resources

- [Municipal Research and Services Center](#) – MSRC offers a wide range of services to local government, including resources for housing planning
- [Local Housing Solutions Housing Needs Assessment](#) – data tool created in partnership with PolicyLink and managed by the New York University Furman Center’s Housing Solutions Lab that provides customized jurisdictional reports on housing needs, market conditions, demographics, and more
- [Planning for Equity Policy Guide](#) – American Planning Association guide on crafting policies that undo inequitable planning policies

Community Engagement Resources

- [King County Community Engagement Guide](#) - King County community engagement guide to assist jurisdiction staff with designing community engagement processes broadly
- [Community Engagement Resource Library](#) - Racial Equity Tools resource library of strategies to make sure that all voices are heard as part of inclusive decision making
- [Equitable Engagement for Comprehensive Plans](#) - Puget Sound Regional Council guide for conducting equitable community engagement during comprehensive plans update

Other Comprehensive Plan Review Process Resources

- [Washington State Department of Commerce Plan Review](#) – provides guidance on how to submit plans to the Department of Commerce for state review
- [Puget Sound Regional Council Plan Review Manual](#) – provides guidance and consistency tools for aligning plans and policies with VISION 2050 and requirements in state law

Housing-focused Draft Comprehensive Plan Review Checklist

Please complete and submit this checklist as part of your submission to the King County Affordable Housing Committee Housing-focused Draft Comprehensive Plan Review Program. Include the full text and page number of each draft policy that addresses each King County Countywide Planning Policies (CPP) Housing Chapter policy. Jurisdiction staff are encouraged to include additional information for reviewers to consider in the “notes” column of the checklist. You can review the full text of each Housing Chapter CPP and the Housing Technical appendix [here](#).

<u>CPP Housing Chapter Policy</u> <i>summarized</i>	<u>Comprehensive Plan</u> <i>Policy or Inventory and Analysis Section</i>	<i>Page #</i>	<u>Notes</u> <i>optional</i>
Plan for and Accommodate Housing Need			
H-1 Housing needs table for jurisdictions			
H-2 Prioritize the need for housing affordable to households less than or equal to 30 percent area median income (extremely low-income) by implementing tools such as: <ul style="list-style-type: none"> a) Increasing capital, operations, and maintenance funding; b) Adopting complementary land use regulations; c) Fostering welcoming communities, including people with behavioral health needs; d) Adopting supportive policies; and e) Supporting collaborative actions by all jurisdictions. 			
Conduct a Housing Inventory and Analysis			
H-3 Conduct an inventory and analysis in each jurisdiction of existing and projected housing needs of all segments of the population and summarize the findings in the housing element. The inventory and analysis shall include:			
<ul style="list-style-type: none"> a) The number of existing and projected housing units necessary to plan for and accommodate projected growth and meet the projected housing needs articulated in Tables H-1 and H-2, including: <ul style="list-style-type: none"> 1) permanent housing needs, which includes units for moderate-, low-, very low-, and extremely low-income households and permanent supportive housing, 2) emergency housing needs, which includes emergency housing and emergency shelters 			
<ul style="list-style-type: none"> b) Number of existing housing units by housing type, age, number of bedrooms, condition, tenure, and area median income limit (for income-restricted units) 			
<ul style="list-style-type: none"> c) Number of existing emergency housing, emergency shelters, and permanent supportive housing facilities and units or beds, as applicable 			
<ul style="list-style-type: none"> d) Percentage and geographic distribution of residential land zoned for moderate- and high-density housing and accessory dwelling units in the jurisdiction 			
<ul style="list-style-type: none"> e) Number of income-restricted units and, where feasible, total number of units, within a half-mile walkshed of high-capacity or frequent transit service where applicable and regional and countywide centers⁷ 			

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<p>f) Household characteristics, by race/ethnicity: 1) income (median and by area median income bracket), 2) tenure (renter or homeowner), 3) housing cost burden and severe housing cost burden</p>			
<p>g) Current population characteristics: 1) age by race/ethnicity, 2) disability</p>			
<p>h) Projected population growth</p>			
<p>i) Housing development capacity within a half-mile walkshed of high-capacity or frequent transit service, if applicable⁷</p>			
<p>j) Ratio of housing to jobs in the jurisdiction</p>			
<p>k) Summary of existing and proposed partnerships and strategies, including dedicated resources, for meeting housing needs, particularly for populations disparately impacted</p>			
<p>l) The housing needs of people who need supportive services or accessible units, including but not limited to people experiencing homelessness, persons with disabilities, people with medical conditions, and older adults</p>			
<p>m) The housing needs of communities experiencing disproportionate harm of housing inequities including Black, Indigenous, and People of Color</p>			
<p>n) Areas in the jurisdiction that may be at higher risk of displacement from market forces that occur with changes to zoning development regulations and public capital investments</p>			
<p>H-4 Evaluate the effectiveness of existing housing policies and strategies to meet the jurisdiction’s housing needs. Identify gaps in existing partnerships, policies, and dedicated resources for meeting housing needs and eliminating racial and other disparities in access to housing and neighborhoods of choice.</p>			
<p>H-5 Document the local history of racially exclusive and discriminatory land use and housing practices, consistent with local and regional fair housing reports and other resources. Explain the extent to which that history is still reflected in current development patterns, housing conditions, tenure, and access to opportunity. Identify local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing, including zoning that may have a discriminatory effect, disinvestment, and infrastructure availability. Demonstrate how current strategies are addressing impacts of those racially exclusive and discriminatory policies and practices. The County will support jurisdictions in identifying and compiling resources to support this analysis.</p>			

⁷ AHC staff can provide a shapefile of frequent and high-capacity transit in King County

Collaborate Regionally			
H-6 Collaborate with diverse partners (e.g., employers, financial institutions, philanthropic, faith, and community-based organizations) on provision of resources (e.g., funding, surplus property) and programs to meet countywide housing need.			
H-7 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.			
Implement Policies and Strategies to Meet Housing Needs Equitably Equitable Processes and Outcomes			
H-8 Collaborate with populations most disproportionately impacted by housing cost burden in developing, implementing, and monitoring strategies that achieve the goals of this chapter. Prioritize the needs and solutions articulated by these disproportionately impacted populations.			
H-9 Adopt intentional, targeted actions that repair harms to Black, Indigenous, and other People of Color households from past and current racially exclusive and discriminatory land use and housing practices (generally identified through Policy H-5). Promote equitable outcomes in partnership with communities most impacted.			
Implement Policies and Strategies to Meet Housing Needs Equitably Increased Housing Supply, Particularly for Households with the Greatest Needs			
H-10 Adopt policies, incentives, strategies, actions, and regulations that increase the supply of long-term income-restricted housing for extremely low-, very low-, and low-income households and households with special needs.			
H-11 Identify sufficient capacity of land for housing including, but not limited to income-restricted housing; housing for moderate-, low-, very low-, and extremely low-income households; manufactured housing; multifamily housing; group homes; foster care facilities; emergency housing; emergency shelters; permanent supportive housing; and within an urban growth area boundary, duplexes, triplexes, and townhomes.			
H-12 Adopt and implement policies that improve the effectiveness of existing housing policies and strategies and address gaps in partnerships, policies, and dedicated resources to meet the jurisdiction's housing needs.			
H-13 Implement strategies to overcome cost barriers to housing affordability. Strategies to do this vary but can include updating development standards and regulations, shortening permit timelines, implementing online permitting, optimizing			

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<p>residential densities, reducing parking requirements, and developing programs, policies, partnerships, and incentives to decrease costs to build and preserve affordable housing.</p>			
<p>H-14 Prioritize the use of local and regional resources (e.g., funding, surplus property) for income-restricted housing, particularly for extremely low-income households, populations with special needs, and others with disproportionately greater housing needs. Consider projects that promote access to opportunity, anti-displacement, and wealth building for Black, Indigenous, and People of Color communities to support implementation of policy H-9.</p>			
<p>Implement Policies and Strategies to Meet Housing Needs Equitably Expanded Housing Options and Increased Affordability Accessible to Transit and Employment</p>			
<p>H-15 Increase housing choices for everyone, particularly those earning lower wages, that is co-located with, accessible to, or within a reasonable commute to major employment centers and affordable to all income levels. Ensure there are zoning ordinances and development regulations in place that allow and encourage housing production at levels that improve jobs-housing balance throughout the county across all income levels.</p>			
<p>H-16 Expand the supply and range of housing types, including affordable units, at densities sufficient to maximize the benefits of transit investments throughout the county</p>			
<p>H-17 Support development and preservation of income-restricted affordable housing near high-capacity transit</p>			
<p>Implement Policies and Strategies to Meet Housing Needs Equitably Expanded Housing and Neighborhood Choice for All Residents</p>			
<p>H-18 Adopt inclusive planning tools and policies whose purpose is to increase the ability of all residents in jurisdictions throughout the county to live in the neighborhood of their choice, reduce disparities in access to opportunity areas, and meet the needs of the region’s current and future residents by:</p> <ul style="list-style-type: none"> a) Providing access to affordable housing to rent and own throughout the jurisdiction, with a focus on areas of high opportunity; b) Expanding capacity for moderate-density housing throughout the jurisdiction, especially in areas currently zoned for lower density single-family detached housing in the Urban Growth Area, and capacity for high-density housing, where appropriate, consistent with the Regional Growth Strategy; c) Evaluating the feasibility of, and implementing, where appropriate, inclusionary and incentive zoning to provide affordable housing; and d) Providing access to housing types that serve a range of household sizes, types, and incomes, including 2+ bedroom homes for families with children and/or adult roommates and accessory dwelling units, efficiency studios, and/or congregate residences for single adults 			

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<p>H-19 Lower barriers to and promote access to affordable homeownership for extremely low-, very low-, and low-income, households. Emphasize: a) Supporting long-term affordable homeownership opportunities for households less than or equal to 80 percent area median income (which may require up-front initial public subsidy and policies that support diverse housing types); and Remedying historical inequities in and expanding access to homeownership opportunities for Black, Indigenous and People of Color communities.</p>			
<p>H-20 Adopt and implement policies that address gaps in partnerships, policies, and dedicated resources to eliminate racial and other disparities in access to housing and neighborhoods of choice.</p>			
<p>H-21 Adopt policies and strategies that promote equitable development and mitigate displacement risk, with consideration given to the preservation of historical and cultural communities as well as investments in low-, very low-, extremely low-, and moderate-income housing production and preservation; dedicated funds for land acquisition; manufactured housing community preservation, inclusionary zoning; community planning requirements; tenant protections; public land disposition policies; and land that may be used for affordable housing. Mitigate displacement that may result from planning efforts, large-scale private investments, and market pressure. Implement anti-displacement measures prior to or concurrent with development capacity increases and public capital investments.</p>			
<p>H-22 Implement, promote, and enforce fair housing policies and practices so that every person in the county has equitable access and opportunity to thrive in their communities of choice, regardless of their race, gender identity, sexual identity, ability, use of a service animal, age, immigration status, national origin, familial status, religion, source of income, military status, or membership in any other relevant category of protected people.</p>			
<p>Expanded Housing and Neighborhood Choice for All Residents Housing Stability, Healthy Homes, and Healthy Communities</p>			
<p>H-23 Adopt and implement policies that protect housing stability for renter households; expand protections and supports for moderate-, low-, very low-, and extremely low-income renters and renters with disabilities.</p>			
<p>H-24 Adopt and implement programs and policies that ensure healthy and safe homes.</p>			
<p>H-25 Plan for residential neighborhoods that protect and promote the health and well-being of residents by supporting equitable access to parks and open space, safe pedestrian and bicycle routes, clean air, soil and water, fresh and healthy foods, high-quality education from early learning through K-12, affordable and high-quality transit options and living wage jobs and by avoiding or mitigating exposure to environmental hazards and pollutants.</p>			