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Mayor Bruce Harrell*

July 23, 2024

Ms. Lyons, Community Development Director
City of Covington
16720 SE 271 Street,
Covington, WA 98042

Dear Ms. Lyons,

Thank you for submitting the City of Covington's draft Comprehensive Plan Update 2024 to the Affordable Housing Committee's (AHC) Housing-focused Draft Comprehensive Plan Review Program for review on May 30, 2024. On behalf of the AHC, I am sending you this summary of our review and recommendations.

Background

The AHC is a subcommittee of the Growth Management Planning Council (GMPC), consisting of representatives of King County and its cities, housing providers, area employers, and others. By direction of the GMPC, the AHC now conducts a housing-focused review of all King County jurisdictions' draft periodic comprehensive plan updates, assessing the draft plans for alignment with the [King County Countywide Planning Policies](#) (CPP) Housing Chapter goals and policies prior to plan adoption.

As you know, our county is experiencing a deep and persistent housing shortage. In 2021 the State of Washington adopted [House Bill 1220](#), which amended the Growth Management Act, requiring local governments to plan for and accommodate housing that is affordable to all income levels, including emergency housing. In response to this state mandate and local interest in improving the effectiveness of local housing plans and policies, the AHC led a two-year process to amend the King County CPPs.

The result was a significant update to the CPP Housing Chapter, which was recommended by the GMPC, adopted by the King County Council, and ratified by the cities in 2023. The goals of both the statute and this implementation work are to encourage cities and King County to work together to provide a full range of affordable, accessible, healthy, and safe housing choices to every resident in King County.

This review is guided by Housing-Focused Comprehensive Plan Review Standards, as adopted by [GMPC Motion 23-2](#). In summary, the AHC review seeks to determine whether each jurisdiction's draft plan and submission materials:

1. Address all CPP Housing Chapter policies;
2. Articulate implementation strategies for relevant CPP Housing Chapter Policies; and
3. Lay out meaningful policies that, taken together, support the jurisdiction's ability to equitably meet housing needs.

AHC members appreciate Covington being among the earlier jurisdictions to submit to the program in 2024. This program is still relatively new and evolving, and your engagement helps the AHC understand how jurisdictions are seeking to address their housing needs while aligning with the recent changes at the state, regional, and county levels.

The AHC acknowledges the substantial amount of time and effort that went into Covington’s draft comprehensive plan. During review, the AHC noted that many of Covington’s plans, policies, analyses, and implementation strategies align well with CPP Housing Chapter policies. In particular,

1. Covington is a member of South King Housing and Homelessness Partners (SKHHP) and a contributor to SKHHP’s Housing Capital Fund. This partnership, outlined in Covington’s Housing Element Technical Appendix (Part 3, page 6), promotes subregional collaboration to increase housing stability and produce and preserve quality affordable housing in South King County.
2. In this update, Covington discusses equity in their Comprehensive Plan for the first time. They defined it in their Foundation Element and document desired equity outcomes for each planning topic, including housing.

Below, the AHC includes recommendations necessary for Covington to align with the CPP Housing Chapter policies.

Recommendations to Align with the CPP Housing Chapter

The AHC recommends Covington take the following actions to align its draft comprehensive plan with CPP Housing Chapter goals and policies.

1. Prioritize extremely low-income households (CPP H-2)

Relevant Countywide Planning Policies

CPP H-2 requires jurisdictions to prioritize the need for housing affordable to households with incomes less than or equal to 30 percent of area median income (AMI).

Covington’s Proposal and AHC Findings

Covington’s proposed Housing Element policy HO-1 directs Covington to work in partnership with King County and other cities to meet the countywide housing needs for “very low-, low-, and moderate-income households.” Several of Covington’s other Housing Element policies and associated implementation strategies target “low-income households” and may benefit extremely low-income households (households with incomes at or below 30 percent of AMI). However, based on the materials Covington submitted, the AHC does not see a policy that clearly demonstrates a *prioritization* for the housing needs of 0 to 30 percent AMI households.

Recommendation 1: To align with CPP H-2, Covington should amend relevant Housing Element policies and implementation strategies to clearly demonstrate how it will prioritize extremely low-income households’ housing needs.

2. Complete the housing inventory and analysis (CPP H-3)

Relevant Countywide Planning Policies

CPP H-3 directs jurisdictions to conduct a housing inventory and analysis to help identify and address the greatest needs as well as summarize the findings in the Housing Element.

Covington’s Proposal and AHC Findings

While Covington’s submission includes many data points and substantive analysis, the AHC could not find specific information required by H-3(c), (f), and (g). This includes:

- c) number of existing emergency housing, emergency shelters, and permanent supportive housing facilities and units or beds, as applicable;
- f) housing cost burden and severe housing cost burden by race/ethnicity; and
- g) age by race/ethnicity.

Covington’s Housing Element’s Exhibit 1 aggregates housing supply by income level but does not list the number of existing emergency housing, emergency shelters, and permanent supportive housing facilities and units or beds as required by CPP H-3(c) (page H-5). Covington’s Housing Technical Appendix shows housing cost burden between “White alone, not Hispanic” and “BIPOC overall,” rather than disaggregating data by race and ethnicity, as required by CPP H-3(f) (page 15). Disaggregating cost burden by race/ethnicity could more accurately represent Covington’s community, as races and ethnicities within the Black, Indigenous, and People of Color (BIPOC) category do not all have the same rate of cost burden.

Recommendation 2: Covington should include all inventory and analysis components as required by H-3 in the comprehensive plan and summarize the findings in the Housing Element. Covington should provide rationale, such as statistical limitations, if they choose not to include specified data points. This additional analysis should inform additional comprehensive plan policy responses and strategies.

3. Address racial disparities in homeownership and cost burden (CPPs H-9 and H-19)

Relevant Countywide Planning Policies

CPP H-9 requires all jurisdictions to adopt intentional, targeted actions that repair harms from identified past and current racially exclusive and discriminatory land use and housing practices. CPP H-19 requires all jurisdictions to lower barriers to and promote access to affordable homeownership for extremely low-, very low-, and low-income households and emphasize remedying historical inequities in and expanding access to homeownership opportunities for BIPOC communities.

Covington’s Proposal and AHC Findings

Covington’s Housing Element Technical Appendix identifies racial disparities in homeownership and cost burden rates among their residents (Part 1, page 23). While Covington proposes a number of strategies to improve housing affordability, such as those identified in their Housing Element policy HO-2, the plan does not articulate how these strategies respond to the racial disparities identified in their Housing Element Technical Appendix.

Proposed Housing Element policy HO-10 states “If [racially disparate impacts and displacement risk levels identified in the Housing Element] trends worsen, update the City’s plans, policies, codes, or programs as needed to improve outcomes.” While the AHC commends Covington’s commitment to monitoring and responding to future racially disparate impacts, Covington should also commit to address current racial disparities in homeownership and cost burden in their comprehensive plan to align with CPP H-9.

Recommendation 3: To align with CPP H-9, Covington should amend policy HO-10 to address current racially disparate impacts. To align with CPPs H-9 and H-19, Covington should amend their Housing Element to clarify how its existing policies address, or include a new policy to address, racial disparities in homeownership rates and cost burden. For examples of strategies Covington could use to align with CPPs, see the CPP Housing Chapter Technical Appendix.¹

4. Clarify community engagement findings (CPP H-8)

Relevant Countywide Planning Policies

CPP H-8 requires all jurisdictions to collaborate with and prioritize the needs of populations most disproportionately impacted by housing cost burden.

Covington’s Proposal and AHC Findings

According to Covington’s Housing Element Technical Appendix, the populations most disproportionately impacted by housing cost burden are BIPOC households, and extremely low-, very low-, and low-income households (Part 1, page 15). In their Engagement Plan, Covington clearly demonstrates their engagement strategy and lists community stakeholders, including BIPOC business owners, an organization that works with people experiencing homelessness, senior housing, a food bank, and other public institutions. This shows a good faith effort to collaborate with communities most disproportionately impacted by housing cost burden. Covington staff indicated that they did conduct and document this work and shared a link in advance of the July 23 AHC meeting, but it was not included as part of their submission to the AHC. Without this information, the AHC cannot determine if Covington is prioritizing the needs and solutions articulated by these communities.

Recommendation 4: To align with CPP H-8, Covington should demonstrate how they collaborated with and prioritized the needs of populations most disproportionately impacted by housing cost burden.

5. Explicitly plan for and prioritize income-restricted housing (CPPs H-10 and H-14)

Relevant Countywide Planning Policies

CPPs H-10 and H-14 address the need for “income-restricted housing.” CPP H-10 requires jurisdictions to 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. CPP H-14 requires jurisdictions to prioritize resources for income-restricted housing, particularly for extremely low-income households, populations with special needs, and others with disproportionately greater housing needs.

Covington’s Proposal and AHC Findings

Covington’s submission proposes policies and implementation strategies that use the term “affordable housing,” including its Multifamily Tax Exemption program, which will likely support development of income-restricted affordable housing. Covington also proposes policy HO-27, which would direct Covington to “work with affordable housing providers on the acquisition and

¹ See King County Countywide Planning Policies Appendix 4: Housing Technical Appendix, pp.82. [\[link\]](#)

rehabilitation of housing for long term affordability.” The AHC commends Covington for these efforts. However, the AHC could not find a policy that proposes explicitly planning for long-term *income-restricted* affordable housing. While the term “affordable housing” includes income-restricted affordable housing, it also includes naturally occurring affordable housing, which is not guaranteed to remain affordable. Income-restricted housing is guaranteed to provide lower-income people with an affordable place to live through a regulatory restriction to limit its price to be affordable to households at certain income levels.

Recommendation 5: To align with CPPs H-10 and H-14 Covington should include policies, incentives, actions, and regulations in its plan and/or implementation strategies that explicitly increase the supply of long-term income-restricted housing.

6. Adjust affordability assumptions for accessory dwelling units (CPP H-11)

Relevant Countywide Planning Policies

CPP H-11 requires jurisdictions identify sufficient capacity of land for housing including housing for low-, very low-, and extremely low-income households.

Covington’s Proposal and AHC Findings

Covington’s draft plan allows accessory dwelling units (ADUs) in all residential zones, in alignment with recent state legislation, and exempts them from impact fees. The AHC appreciates Covington’s steps to allow more ADUs as a method of increasing housing diversity and options within traditionally single-family areas. However, Covington’s submission to the AHC assumes ADUs would be affordable to households with incomes between 0 and 80 percent AMI and permanent supportive housing needs (Housing Technical Appendix, Part 2, page 3).

The AHC does not consider ADUs as a meaningful strategy to address housing needs below 80 percent of AMI nor permanent supportive housing needs in King County communities, which have relatively higher housing costs compared to the rest of the state.²

Recommendation 6: To align with CPP H-11, Covington should update their land capacity analysis to either:

- assume ADUs provide capacity for households above 80 percent of AMI, in alignment with Exhibit 13 in the Department of Commerce’s land capacity analysis guidance,
- provide evidence in a detailed market analysis that ADUs are affordable to low-income households, or
- propose subsidies or development incentives that set a reasonable expectation that ADUs would be affordable to low-income households.

If adjusting this assumption creates a deficit, Covington should propose new capacity to accommodate 0 through 80 percent of AMI households through other housing types.

² Department of Commerce (2023, August). *Guidance for Updating Your Housing Element*. Chapter 3: Land Capacity Analysis. Page 33. [\[link\]](#)

7. Increase housing options for 0 to 80 percent AMI households in Residential zones (CPPs H-18(a))

Relevant Countywide Planning Policies

CPP H-18(a) requires all jurisdictions to adopt inclusive planning tools and policies that increase the ability of all residents in jurisdictions throughout King 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 providing access to affordable housing to rent and own throughout the jurisdiction, with a focus on areas of high opportunity.

Covington's Proposal and AHC Findings

Covington's draft Future Land Use Map proposes accommodating multifamily housing types, which are most likely to serve 0 to 80 percent AMI housing needs, in the Downtown, Multifamily Residential, and Lakepointe Urban Village Subarea zones. The AHC commends Covington for taking steps to provide more opportunities for housing types likely to serve low-income households. However, the AHC finds that Covington's proposed land use pattern does not meaningfully increase affordable options for low-income households "throughout" the city.

Covington's draft Future Land Use map proposes only a few parcels north of State Route 18 that could allow housing likely to serve low-income households. While Covington's efforts to allow middle housing and accessory dwelling units in historically single-family residential areas will increase housing diversity and choice, those housing types are unlikely to serve low-income households. Additionally, Covington's draft Land Use Element explains that "to enhance the quality of life in existing residential neighborhoods and preserve environmentally sensitive areas, Covington strategically focuses its growth in two urban centers: Downtown and Lakepointe." (page LU-6). The AHC is concerned that this is not consistent with CPP H-18 by implying that excluding housing types likely to serve low-income households will enhance the quality of life for higher income households in lower density areas.

Recommendation 7: To align with CPP H-18(a), Covington should include additional or revised policies and/or implementation strategies that increase housing options for 0 to 80 percent of AMI households "throughout the jurisdiction", particularly in residential zones. Increasing access does not necessarily mean Covington needs to allow midrise multifamily housing in all residential zones. Any land use capacity changes should be consistent with county and regional requirements.

Conclusion and AHC Resources

Thank you again for your submission to the Committee's housing-focused comprehensive plan review program. AHC members valued the opportunity to review Covington's draft Comprehensive Plan Update 2024 and related submission materials. Covington's participation in the plan review program is instrumental in the broader work of the Committee to empower local jurisdictions to address the affordable housing crisis in King County.

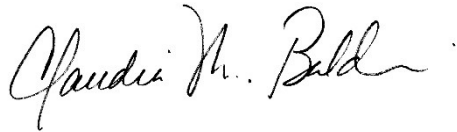
AHC staff are happy to assist Covington in addressing these recommendations. For immediate resources and guidance on aligning with the CPP Housing Chapter, refer to the:

- [Engrossed 2021 King County CPPs](#);
- [AHC Housing-focused Draft Comprehensive Plan Review Program Guide](#); and

- [King County Resources for Documenting the Local History of Racially Exclusive and Discriminatory Land Use and Housing Practices.](#)

If you have questions or need additional information regarding aligning with the CPP Housing Chapter, please contact lead staff for the AHC plan review program, Isaac Horwith, at AHCplanreview@kingcounty.gov or at 206-477-7813.

Sincerely,



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