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November 7, 2024

Rebecca Deming,
Community Development Director
City of Des Moines
21630 11th Ave S, Suite A
Des Moines, WA 98198

Dear Ms. Deming,

Thank you for submitting the City of Des Moines' Imagine Des Moines draft comprehensive plan to the Affordable Housing Committee's (AHC) Housing-focused Draft Comprehensive Plan Review Program for review on August 9, 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.

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 Des Moines' draft comprehensive plan. During review, the AHC noted that many of Des Moines' plans, policies, analyses, and implementation strategies align well with CPP Housing Chapter policies. In particular:

1. Des Moines' draft plan shows a strong commitment to collaboration with diverse partners and populations most disproportionately impacted by housing cost burden, which aligns with CPPs H-6 and H-8. The 2023 Housing Action Plan (HAP) shows a clear link between the City's intentional engagement efforts with community groups and housing partners and the development of the HAP's recommended actions to overcome the lack of access to affordable housing options within the city.
2. Des Moines' draft plan, including its Housing, Land Use, and the Healthy Des Moines Elements, demonstrates a meaningful effort to address CPP H-25, which requires jurisdictions to plan for neighborhoods that promote residents' health and well-being through equitable access to resources like parks, fresh food, transit, clean air, and avoiding or mitigating exposure to environmental hazards and pollutants. The draft Housing Element emphasizes infrastructure improvements and the avoidance of siting housing near environmental hazards such as the Seattle-Tacoma International Airport. The Healthy Des Moines Element supports community health by focusing on access to community gardens. The Land Use Element supports CPP H-25 by encouraging mixed-use developments that promote walking, biking, and transit access, while also removing barriers to healthy food access through farmers' markets and urban agriculture.

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

Recommendations to Align with the CPP Housing Chapter

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

- 1. Identify sufficient land capacity for permanent and emergency housing needs (CPPs H-1 and H-11)**

Relevant Countywide Planning Policies

CPP H-1 requires Des Moines to plan for and accommodate 3,800 units of permanent housing, including 790 housing units affordable to households at 0 to 30 percent of area median income (AMI), 231 units at 30 to 50 percent of AMI, 227 units at 50 to 80 percent of AMI, 281 units at 80 to 100 percent of AMI, and 318 units at 100 to 120 percent of AMI, as well as 415 units of permanent supportive housing. CPP H-1 also requires Des Moines to plan for and accommodate 726 emergency housing beds. CPP H-11 requires jurisdictions to identify sufficient capacity of land for moderate-, low-, very low-, and extremely low-income households, as well as permanent supportive and emergency housing.

Des Moines' Proposal and AHC Findings

Des Moines' draft comprehensive plan cites King County's Urban Growth Capacity Report to demonstrate that the City has 8,386 units of capacity as of 2018. The plan states that 6,000 of these units are found in high-density zones, and that there is "no question that Des Moines meets the capacity requirement," even after accounting for the 889 housing units constructed in the city since 2018 (Des Moines Draft Housing Element, page 5).

However, CPP H-11 requires that Des Moines demonstrate sufficient capacity of land for moderate-, low-, very low-, and extremely low-income and permanent supportive housing needs that the City must plan for and accommodate pursuant to CPP H-1. Without a by-income level analysis that matches housing needs to residential zoning capacity, as directed by the Washington State Department of Commerce, the AHC finds that the plan does not sufficiently demonstrate land capacity for its allocated housing needs.¹

Des Moines also did not include an emergency housing capacity analysis in the draft plan or related submission materials. Without this analysis, the AHC cannot determine if Des Moines is planning for and accommodating its emergency housing needs and has sufficient land capacity for its emergency housing allocation.

Recommendation 1: To align with CPPs H-1 and H-11, Des Moines should demonstrate that it is providing sufficient residential capacity for its allocated permanent housing needs, by income level, and emergency housing needs through a land capacity analysis. If the analysis reveals a deficit, Des Moines should propose changes and demonstrate that it will provide sufficient capacity for all income levels and for emergency housing. Please see Washington State Department of Commerce's [Guidance for Updating Your Housing Element](#) as a guide for how to complete a land capacity analysis.

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

Relevant Countywide Planning Policies

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

Des Moines' Proposal and AHC Findings

Des Moines' submission to the AHC identifies a suite of draft Housing Element policies and implementation strategies that address CPP H-2, including strategies to:

- assist the private sector, nonprofit agencies, and public entities in the planning and development of special housing needs housing;
- not impose regulatory barriers on permanent supportive housing;
- encourage the equitable distribution of low-income and special needs housing;
- remove potential barriers to housing needs generally; and,
- encourage the acquisition and preservation of income-restricted housing.

While these policies will likely benefit extremely low-income households, the AHC does not find that they explicitly *prioritize* extremely low-income households, as required by CPP H-2.

¹ Washington State Department of Commerce (2023 August). *Guidance for Updating Your Housing Element*. Page 18-44. [\[link\]](#)

Recommendation 2: To align with CPP H-2, Des Moines should amend Housing Element policies and implementation strategies to prioritize the need for housing affordable to extremely low-income households. For examples of strategies Des Moines could use to align with CPP H-2, see the CPP Housing Chapter Technical Appendix.²

3. Complete the housing inventory and analysis (CPPs H-3, H-4, and H-20)

Relevant Countywide Planning Policies

CPP H-3 directs jurisdictions to conduct a housing inventory and analysis to help identify and address the greatest needs and summarize the findings in the Housing Element. CPP H-4 requires jurisdictions to evaluate the effectiveness of existing housing policies and strategies to meet their housing needs and 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. CPP H-20 requires that jurisdictions address gaps in partnerships, policies, and dedicated resources to eliminate racial and other disparities in access to housing and neighborhoods of choice.

Des Moines' Proposal and AHC Findings

While Des Moines' submission includes many data points and substantive analysis, the AHC could not find specific information required by CPPs H-3(f), (g), and (m). This includes:

- f. household characteristics by race/ethnicity, including income (median and by AMI bracket), tenure (renter or homeowner), housing cost burden, and severe housing cost burden;
- g. current population ages by race/ethnicity; and
- m. the housing needs of communities experiencing disproportionate harm of housing inequities including Black, Indigenous, and People of Color.

This analysis should inform additional comprehensive plan policy responses and strategies. For example, analysis responsive to CPP H-3(m) could help Des Moines identify and adopt targeted actions that repair harms caused by racially exclusive and discriminatory land use and housing practices, in alignment with CPP H-9 (see recommendation 4).

The AHC did also not find an analysis that identifies gaps in existing partnerships, policies, and dedicated resources for eliminating racial and other disparities in access to housing and neighborhoods of choice, as required by CPP H-4. This analysis should inform Des Moines' response to H-20, which requires jurisdictions to address identified gaps in the City's partnerships, policies, and dedicated resources to eliminate racial and other disparities in access to housing and neighborhoods of choice.

Recommendation 3: Des Moines should include all inventory and analysis components as required by CPP H-3 and H-4. CPP H-3 findings should be summarized in the Housing Element. Additional analysis should inform comprehensive plan policy responses and strategies, notably the City's response to CPP H-20

² King County Countywide Planning Policies Appendix 4: Housing Technical Appendix, page 82. [\[link\]](#)

4. Complete a racially disparate impact analysis and adopt intentional, targeted actions to repair harms (CPPs H-5 and H-9)

Relevant Countywide Planning Policies

CPP H-5 requires jurisdictions to:

- document the local history and impact of racially exclusive and discriminatory land use and housing practices;
- 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; and
- demonstrate how current strategies are addressing impacts of those racially exclusive and discriminatory policies and practices.

CPP H-9 requires jurisdictions adopt intentional, targeted actions that repair harms to Black, Indigenous, and People of Color households from identified past and current racially exclusive and discriminatory land use and housing practices (generally identified through CPP H-5).

Des Moines' Proposal and AHC Findings

Des Moines' Housing Technical Appendix in the draft Housing Element includes a description of the requirements of CPP H-5, an account of racially restrictive covenants in Des Moines historically, and a general description of how past and current policies result in racially disparate impacts, displacement, and exclusion in housing (pp.H-A-1-3). The supplemental Housing Needs Analysis also include some information on racial demographics within Des Moines.

However, as mentioned in recommendation 3, Des Moines' draft plan does not include key data on household characteristics by race/ethnicity, which makes it difficult to assess racially disparate impacts (e.g., disparities in homeownership, cost-burden, and displacement risk). Additionally, the draft plan does not explain the extent to which the history of racially exclusive and discriminatory land use and housing practices is still reflected *locally* in current development patterns, housing conditions, tenure, and access to opportunity. The plan also does not identify how current policies and regulations have potentially resulted in racially disparate impacts, displacement, and exclusion in housing.

Without these analyses, the AHC cannot assess whether current strategies are addressing past and current impacts of racially exclusive and discriminatory land use and housing policies and practices, as required by CPP H-5. It is also difficult to assess whether Des Moines is taking targeted actions to repair harm to Black, Indigenous, and People of Color households from past and current racially exclusive and discriminatory land use and housing practices, in alignment with CPP H-9.

Recommendation 4: To align with CPP H-5, Des Moines should:

- document the history of racially exclusive and discriminatory land use and housing practices within their jurisdiction;
- explain the extent to which the 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; and
- demonstrate how current strategies are addressing impacts of those racially exclusive and discriminatory policies and practices.

See the [Resources for Documenting the Local History of Racially Exclusive and Discriminatory Land Use and Housing Practices](#) document for assistance.

To align with CPP H-9, Des Moines should adopt or clarify how proposed actions are targeted to repair harms identified in their racially disparate impacts analysis. For strategies to align with CPP H-9, see the CPP Housing Chapter Technical Appendix.³

5. Support the development and preservation of income-restricted affordable housing within walking distance to planned and existing high-capacity and frequent transit (CPPs H-16 and H-17)

Relevant Countywide Planning Policies

CPP H-16 requires jurisdictions expand the supply and range of housing types—including affordable units—at densities sufficient to maximize the benefits of transit investments throughout the county. CPP H-17 requires jurisdictions support development and preservation of income-restricted affordable housing near high-capacity transit.

Des Moines' Proposal and AHC Findings

Des Moines' draft plan identifies the opportunity for transit-oriented development around three new Sound Transit Federal Way Link Extension light rail station areas: Kent/Des Moines Station near Highline College, Star Lake Station on South 272nd Street at I-5, and the Federal Way Transit Center. Similarly, portions of the Pacific Ridge, South Des Moines, and Woodmont Neighborhoods are located along King County Metro RapidRide bus lines (Land Use Element page 2). The draft plan also demonstrates that there is significant multifamily development capacity around existing and future stations (Des Moines Draft Housing Element, page 5).

However, the AHC finds that the draft plan does not set reasonable expectations that it will expand the supply and range of affordable units at densities sufficient to maximize the benefits of these transit investments, or that it will support the preservation and development of income-restricted affordable housing within walking distance to these high-capacity and frequent transit hubs, as required by CPPs H-16 and H-17 respectively.

Specifically, the draft plan's goals and policies commit the City generally to "encourage affordable housing availability in all neighborhoods throughout the City, particularly in proximity to future or

³ King County Countywide Planning Policies Appendix 4: Housing Technical Appendix, pp. 86-87. [\[link\]](#)

existing high-capacity transit” or to “consider” affordability and density requirements around frequent and high-capacity transit stations (HOU 1.2.2 and HOU 1.2.3). Without explicit strategies and commitments to support affordable and income-restricted housing in areas within walking distance to planned and existing high-capacity and frequent transit, it is unclear to the AHC how Des Moines will meaningfully align with the requirements of CPPs H-16 and H-17.

Recommendation 5: To align with CPPs H-16 and H-17, Des Moines should commit to specific policies and implementation strategies that will expand the supply and range of affordable housing at densities sufficient to maximize the benefits of transit investments in Des Moines and support the development of income-restricted housing within walking distance to planned and existing high-capacity and frequent transit stations. For strategies to align with CPPs H-16 and H-17, see the CPP Housing Chapter Technical Appendix.⁴

6. Provide more detailed implementation strategies policies for CPPs requiring implementation or adoption (CPPs H-10, H-12, H-13, H-21, and H-27)

Relevant Countywide Planning Policies

CPP H-10 requires jurisdictions 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-12 requires jurisdictions 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. CPP H-13 requires jurisdictions implement strategies to overcome cost barriers to housing affordability. CPP H-21 requires jurisdictions adopt policies and strategies that promote equitable development and mitigate displacement risk; mitigate displacement that may result from planning efforts, large-scale private investment, and market pressure; and implement anti-displacement policies prior to or concurrent with development capacity increases and public capital investments. CPP H-27 requires jurisdictions submit strategies implemented during the reporting period to advance the policies of the CPP Housing Chapter.

Des Moines’ Proposal and AHC Findings

Des Moines submitted 32 implementation strategies to the AHC that outline actions the City will take to implement its housing policies. While some submitted strategies commit the City to specific actions, many of the strategies submitted lack enough detail for the AHC to understand how Des Moines will implement policies responsive to the CPPs, specifically for CPPs H-10, H-12, H-13, and H-21.

For example, submitted strategies HOU 1.2.3, 1.2.6, and 4.3.3 commit the City to only “consider” potential actions that address CPPs H-12 and H-13. In other cases, strategies obligate the City to “review” policies for ways to align with specific CPP policies (i.e. HOU 1.2.5), but do not state an intention to implement specific policies, as required by these CPPs. Some policies describe how the City will take general action without specifying which actions or policies the City will implement. For example, HOU 1.3.5 reads that the city will “establish policies and procedures to mitigate displacement if and when new development occurs, with specific considerations for low-, very low-,

⁴ King County Countywide Planning Policies Appendix 4: Housing Technical Appendix, pp. 99-101. [\[link\]](#)

extremely low-, and moderate-income housing options,” but does not specify which anti-displacement policies it will adopt.

The AHC recognizes the challenge in providing detailed implementation strategies before final adoption of Des Moines’ comprehensive plan. The AHC also finds that many of Des Moines’ draft policies are responsive to the CPPs listed above are well aligned with the CPP Housing Chapter. However, given the level of detail provided and actions proposed, the AHC finds that Des Moines submitted materials do not set reasonable expectations that the City will implement the policies responsive to these CPPs.

In 2023, Des Moines adopted a HAP, which outlines 28 specific strategies, many of which apply to CPPs H-10, H-12, and H-13. The HAP also details how the adoption of recommended implementation strategies will help mitigate displacement, in alignment with CPP H-21. Housing Element implementation strategy HOU 1.1.4 commits the City to incorporating the HAP implementation strategies to overcome the lack of access to affordable housing options. Incorporating recommended HAP actions as implementation strategies for the AHC to monitor over the course of the planning period would strengthen the meaningfulness of Des Moines’ responses to CPPs H-10, H-12, H-13, and H-21.

Recommendation 6: To align with CPP H-27, Des Moines should submit implementation strategies that demonstrate how Des Moines will take meaningful action to implement CPPs H-10, H-12, H-13, H-20, and H-21. To respond to this recommendation, the AHC encourages Des Moines to submit actions outlined in the adopted 2023 HAP as implementation strategies for the AHC to monitor, specifically those strategies that relate to:

- increasing the supply of income-restricted housing, in alignment with CPP H-10;
- improving the effectiveness of existing policies and addressing gaps in partnerships, policies, and dedicated resources, in alignment with CPP H-12;
- overcoming cost barriers to housing affordability, in alignment with CPP H-13; and
- mitigating displacement, in alignment with CPP H-21.

Des Moines may submit updated implementation strategies in 2025. AHC staff will coordinate and provide additional guidance to support this recommendation.

Conclusion and AHC Resources

Thank you again for your submission to the Committee’s Housing-focused Draft Comprehensive Plan Review Program. AHC members valued the opportunity to review Des Moines’ Draft Comprehensive Plan and related submission materials. Des Moines’ 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 Des Moines in addressing these recommendations. For immediate resources and guidance on aligning with the CPP Housing Chapter, refer to the:

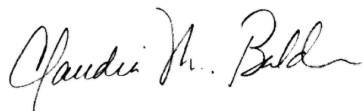
- [Engrossed 2021 King County CPPs](#);

- [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](#).

The AHC would also like to acknowledge that Des Moines may be challenged to address recommendations in this letter before the state-mandated deadline for comprehensive plan adoption of December 31, 2024, and may potentially adopt a comprehensive plan in 2024 that is not in alignment with the CPP Housing Chapter. In that case, the City is encouraged to amend its plan in 2025 to incorporate AHC feedback and bring its plan into alignment with the CPP Housing Chapter policies.

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, Carson Hartmann, at AHCplanreview@kingcounty.gov or 206-848-0681.

Sincerely,



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