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February 6, 2025

Kristen Holdsworth
Long Range Planning Manager
City of Kent
400 West Gowe Street
Kent, WA 98032

Dear Ms. Holdsworth,

Thank you for submitting the City of Kent's draft Building Our Future Together 2044 Comprehensive Plan to the Affordable Housing Committee's (AHC) Housing-focused Draft Comprehensive Plan Review Program for review on November 18, 2024, and an updated comprehensive plan draft on December 5, 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 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 Kent's comprehensive plan. During review, the AHC noted that many of Kent's plans, policies, analyses, and implementation strategies align well with CPP Housing Chapter policies. In particular:

1. Kent's housing inventory and analysis, including evaluation of existing programs, identification of gaps, and documentation of the local history of racially exclusive and discriminatory land use and housing practices, is thorough and well documented. These components of the plan are well aligned with CPPs H-3, H-4, and H-5.
2. In alignment with CPPs H-6 and H-7, Kent's plan commits the City to ongoing collaboration with diverse partners on the provision of resources and programs to meet countywide housing needs, including the City's ongoing membership in South King Housing and Homelessness Partners (SKHHP), and its collaboration with the AHC.
3. Kent's rental housing inspection program and home repair programs are unique and meaningful programs that help ensure healthy and safe homes for the city's residents, in alignment with CPP H-24.

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

Recommendations to Align with the CPP Housing Chapter

The AHC recommends the City of Kent take the following actions to align its comprehensive plan with CPP Housing Chapter goals and policies. The AHC understands that the Kent City Council adopted its comprehensive plan on December 10, 2024. The AHC encourages Kent to amend its plan in 2025 to address AHC feedback and bring its plan into alignment with the King County CPP Housing Chapter policies.

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

Relevant Countywide Planning Policies

CPP H-1 requires Kent to plan for and accommodate 1,872 non-PSH housing units affordable to 0 to 30 percent of AMI households. CPP H-2 requires all jurisdictions to prioritize the need for housing affordable to households less than or equal to 30 percent of area median income (AMI).

Kent's Proposal and AHC Findings

Kent's plan includes policies that may benefit extremely low-income households. Notably, policy H-2.7 directs Kent "be proactive in the siting and development of emergency, transitional, and permanent supportive housing (PSH) options." While this is close to the spirit of CPP H-2, this and Kent's other policies identified as aligned with CPP H-2 do not clearly *prioritize* the need for extremely low-income households.

Additionally, Policy H-2.7 does not mention non-PSH housing units affordable to 0 to 30 percent of AMI households. Although Kent's allocated housing need for 0 to 30 percent of AMI households is relatively less compared to the overall countywide need, Kent must still prioritize serving extremely low-income households.

Recommendation 1: To align with CPP H-2, Kent should update the adopted plan in 2025 to include policies or implementation strategies that prioritize the housing needs of extremely low-income households, including housing that is permanent supportive and non-permanent supportive housing needs.

2. Identify capacity for allocated housing needs by income level (CPPs H-1 and H-11)

Relevant Countywide Planning Policies

CPP H-1 requires Kent to plan for and accommodate a net new need of 10,200 housing units, including 3,962 housing units that are affordable to households with incomes at or below 80 percent of AMI. CPP H-11 requires jurisdictions to identify sufficient capacity of land for housing including, but not limited to, housing for low-, very low-, and extremely low-income households.

Kent's Proposal and AHC Findings

Tables 8 and 9 in Kent's Land Capacity Analysis Appendix show "moderate density" and "middle housing infill" as partially serving the needs of 50 to 80 percent of AMI households. The AHC does not consider moderate density and middle housing infill housing types 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.¹

Recommendation 2: To align with CPPs H-1 and H-11, Kent should update their land capacity analysis to:

- assume moderate density and middle housing infill zones only 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 these housing types are affordable to low-income households, or
- propose subsidies or development incentives that set a reasonable expectation that these housing types would be affordable to extremely low-, very low-, and low-income households.

If adjusting this assumption creates a deficit, Kent should propose new capacity to accommodate the housing needs of households below 80 percent of AMI.

3. Explicitly plan for income-restricted affordable housing in proximity to high-capacity transit (CPP H-17)

Relevant Countywide Planning Policies

CPP H-17 requires jurisdictions support development and preservation of income-restricted affordable housing within walking distance of planned or existing high-capacity and frequent transit.

Kent's Proposal and AHC Findings

Kent's submission identifies policy LU-2.3, which commits Kent to "continue to encourage medium- and high-density residential development in Downtown Kent (the Regional Growth Center) that is

¹ Department of Commerce (2023, August). Guidance for Updating Your Housing Element. Chapter 3: Land Capacity Analysis. Page 35. [\[link\]](#)

affordable to all income levels” as responsive to CPP H-17. This policy may support development of income-restricted affordable housing near the Sound Transit Kent Sounder station in downtown Kent. However, supporting development of “affordable housing” broadly does not guarantee Kent will support income-restricted affordable housing, which will to serve low-income housing needs and remain affordable long term. Additionally, there will soon be a high-capacity transit stop at the Kent-Des Moines light rail station in Kent, and other frequent transit stops throughout the jurisdiction, which policy LU-2.3 does not address.

Kent staff noted that Kent is actively participating in development of multiple income-restricted affordable housing projects near frequent and high-capacity transit. Kent’s support of SKHHP’s preservation strategy will also likely lead to income-restricted affordable housing near high-capacity transit. The AHC applauds Kent for these efforts and finds that they are well aligned with CPP H-17. However, the AHC finds that the policies submitted do not clearly support *income-restricted* affordable housing near all high-capacity and frequent transit in Kent.

Recommendation 3: To align with CPP H-17, Kent should update its plan in 2025 to include a policy that explicitly supports development and preservation of income-restricted affordable housing near frequent and high-capacity transit.

4. Provide more detailed implementation strategies (CPP H-27)

Relevant Countywide Planning Policies

CPP H-27 requires jurisdictions submit strategies implemented during the reporting period to advance the policies of the CPP Housing Chapter.

Kent’s Proposal and AHC Findings

Kent submitted fifteen implementation strategies, many of which describe ongoing efforts at a high level that reflect the significant work already underway in Kent to plan for and accommodate Kent’s housing needs. However, taken together, these implementation strategies do not provide enough detail for the AHC, City staff and elected officials, and other interested parties, to meaningfully assess Kent’s progress to plan for and accommodate its housing needs in the years ahead.

Kent’s 2021 Housing Options Plan contains many meaningfully implementation strategies that appear to align strongly with the CPP Housing Chapter. However, the AHC could not fully assess the meaningfulness of these strategies and their alignment with the CPP Housing Chapter without further information from Kent.

Recommendation 4: Kent should submit more detailed implementation strategies that outline discrete actions AHC staff can measure annually. Specifically, Kent should integrate proposed implementation strategies in the Housing Options Plan into the implementation strategies they submit to the County. Kent may provide updated implementation strategies to the AHC in early 2025.

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 Kent’s Building Our Future Together 2044 Comprehensive Plan and related submission materials. Kent’s participation in the plan review

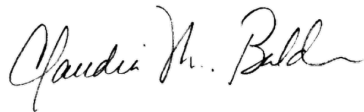
program is instrumental in the broader work of the Committee to empower local jurisdictions to address the affordable housing crisis in King County.

AHC staff are happy to assist Kent 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, Carson Hartmann, at AHCplanreview@kingcounty.gov or 206-848-0681.

Sincerely,



Claudia Balducci
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King County Councilmember, District 6

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