

Affordable Housing Committee

September 28, 2023

KING COUNTY
GROWTH
MANAGEMENT
PLANNING COUNCIL

CHAIR

Claudia Balducci
*King County
Councilmember*

VICE CHAIR

Alex Brennan
Futurewise

MEMBERS

Don Billen
Sound Transit

Susan Boyd
Bellwether Housing

Jane Broom
Microsoft Philanthropies

Kelly Coughlin
*SnoValley Chamber of
Commerce*

Amy Falcone
*Kirkland Councilmember,
Sound Cities Association*

Nigel Herbig
*Kenmore Mayor, Sound
Cities Association*

Ryan Makinster
*Washington Multi-Family
Housing Association*

Sunaree Marshall
*On behalf of King County
Executive Dow
Constantine*

Ryan McIrvine
*Renton Councilmember,
Sound Cities Association*

Teresa Mosqueda
Seattle Councilmember

Lynne Robinson
*Bellevue Mayor, Sound
Cities Association*

Veronica Shakotko
*Master Builders
Association of King and
Snohomish Counties*

Dave Uphergrove
*King County
Councilmember*

Robin Walls
*King County Housing
Authority*

Maiko Winkler-Chin
*On behalf of Seattle
Mayor Bruce Harrell*

Chris Jensen
King County Comprehensive Planning Manager
King County Chinook Building
401 5th Ave. Suite 800
Seattle, WA 98104

Dear Mx. Jensen,

Thank you for submitting King County's draft comprehensive plan to the Affordable Housing Committee (AHC) for housing-focused comprehensive plan review.

As outlined in the amended King County Countywide Planning Policies (CPP) Housing Chapter Policy H-26, the AHC, as a designee of the Growth Management Planning Council, now conducts a housing-focused review of all King County jurisdictions' draft periodic comprehensive plan updates for alignment with the CPP Housing Chapter goals and policies prior to plan adoption and provides comments.¹

AHC members valued the opportunity to review King County's submitted draft comprehensive plan. King County'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.

The AHC acknowledges the substantial amount of time and effort that went into King County's draft comprehensive plan. Many of the plan's policies and analyses align well with CPP Housing Chapter policies, especially:

- 1. The plan's demonstrated commitment to understanding and addressing the housing-related, racially disparate impacts of past and current policies on Black, Indigenous, and People of Color households through a thorough and well-documented analysis.**
- 2. The plan's implementation details on anti-displacement strategies in urban unincorporated King County.** These details, which come from the 2021 King County Skyway-West Hill and North Highline Anti-displacement Strategies Report are specific and actionable and strongly align with anti-displacement goals and policies in the CPPs (see CPP H-21).

Below, the AHC includes both recommendations necessary to align and suggestions to strengthen existing alignment with the CPP Housing Chapter policies.

¹ King County Council adopted CPP amendments establishing this authority on August 15, 2023 [[Ordinance 19660](#)]. These amendments now must be ratified by King County cities.

Recommendations to Align with the CPP Housing Chapter

The AHC recommends King County take the following **actions necessary to align** the draft comprehensive plan with CPP Housing Chapter polices and goals:

Appendix B: Housing Needs Assessment

- 1. The plan’s policies to address housing needs for households at or below 30 percent of AMI. (CPP H-1, H-2, H-4, H-12).** CPP H-1 requires King County to plan for and accommodate net new 0 to 30 percent of area median income (AMI) housing units in urban unincorporated King County over the planning period. CPP H-2 compels jurisdictions to “prioritize the need for housing affordable to households less than or equal to 30 percent of area median income.” Additionally, CPP H-12 asks jurisdictions to “adopt and implement policies that...address gaps in...policies, and dedicated resources to meet...housing needs.” King County’s plan includes several policies that prioritize households at or below 30 percent of AMI. In response to CPP H-4’s requirements to “evaluate the effectiveness of existing housing policies and strategies to meet...housing needs,” the plan identifies a significant gap in the effectiveness of proposed and current strategies to meet the County’s housing needs at or below 30 percent of AMI. Providing information on how proposed strategies will work together to address this gap will better demonstrate how the County is planning for, accommodating, and prioritizing its extremely low-income housing need.

Recommendation 1

King County should explain in the Housing Chapter or the Housing Needs Analysis how the County’s policies serving extremely low-income households work together and how effective these strategies will be at meeting the County’s extremely low-income housing needs over the planning period. This explanation should say if the County needs additional funding to fully implement the proposed policies and meet the County’s housing need.

- 2. Capacity and housing growth distribution (CPP H-18).** CPP H-18 asks jurisdictions to “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.” King County’s plan demonstrates sufficient capacity to meet housing needs at different income levels (in alignment with CPP H-11, which asks jurisdictions to conduct a land capacity analysis) but does not detail how the land capacity of urban unincorporated King County distributes housing growth in a way that expands access to areas of opportunity² and neighborhoods of choice.

² Puget Sound Regional Council has created an Opportunity Index and Map of King County’s census tracts that may be useful for this analysis: <https://www.psrc.org/our-work/opportunity-mapping>.

Recommendation 2

King County should explain through text or mapping where land capacity exists currently and with the proposed code changes for different types of housing. This discussion should explain if land capacity provides access to areas of opportunity and neighborhoods of choice for households of all incomes. AHC staff are happy to assist King County in conducting this analysis.

- 3. Proposed emergency, inclusionary, middle and permanent supportive housing code changes. (CPPs H-1, H-2, H-9, H-12, H-13, H-14, H-15, H-16, H-20, H-25).** As implementation details for CPPs H-1, H-2, H-9, H-12, H-13 H-14, H-15, H-16, H-20, and H-25 (see Appendix A of letter for full policy text), King County states that “The King County Executive will transmit code changes for inclusionary housing, middle housing, permanent supportive housing, and emergency housing with the 2024 Comprehensive Plan.” The County’s plan does not explain the details of these code changes in the Housing Chapter or Housing Needs Assessment. Providing this information is essential to assessing the effectiveness of these proposed policies to meet housing needs over the planning period.

Recommendation 3

King County should explain the proposed housing code changes in either the plan or implementation details. This explanation should detail how these code changes will further the County’s goals.

Comprehensive Plan: Housing Chapter

- 4. Allocated housing needs (CPP H-1).** CPP H-1 outlines King County’s obligation to plan for and accommodate its share of countywide need and Table H-1 in the policy provides urban unincorporated King County’s allocated share of countywide housing needs for 0-30, 31-50, 51-80, 81-100, 100-120 and 120+ percent of AMI levels. While King County mentions general housing needs in the plan’s Housing Chapter and throughout the plan, the plan does not list allocated housing needs outside of the Housing Needs Assessment. Articulating the County’s net new housing need in the main text of the plan will clarify what housing needs King County is planning for and accommodating in urban unincorporated King County.

Recommendation 4

King County should articulate housing needs in the plan’s Housing Chapter and integrate housing needs into other relevant sections of the comprehensive plan such as the Guiding Principles, Urban Communities, Regional Growth Management Planning, and Community Service Areas chapters.

Suggestions to Strengthen Plan Alignment with the CPP Housing Chapter

In addition to these recommendations, the AHC also suggests the following action to **strengthen alignment** of King County's Comprehensive Plan with the CPP Housing Chapter:

1. **The County's intent regarding addressing identified gaps in policies to meet jurisdictional housing needs with a potential Multi-Family Tax Exemption (MFTE) program (CPP H-12).** The plan identifies that the lack of an MFTE program in unincorporated King County as a gap in policies to meet the jurisdiction's housing needs but does not explain the County's intent regarding implementation of this program.

Suggestion 1

King County could state the County's intent regarding implementation of an MFTE program. If the County does not intend to implement an MFTE program, the County could explain why implementation is not proposed as a way to address the gap in King County's current strategies to meet housing needs.

AHC staff are happy to assist King County staff in addressing these recommendations and suggestions. For immediate resources and guidance on aligning with the CPP Housing Chapter, refer to [the CPP Housing Chapter Technical Appendix](#) and the King County [Resources for Documenting the Local History of Racially Exclusive and Discriminatory Land Use and Housing Practices guidance](#).

Thank you again for your submission to the AHC's housing-focused comprehensive plan review program. If you have questions or need additional information regarding aligning with the CPP Housing Chapter, please contact lead staff on the AHC plan review program, Isaac Horwith, at Isaac.Horwith@kingcounty.gov or at 206-477-7813.

Sincerely,



Claudia Balducci
Affordable Housing Committee Chair
King County Councilmember, District 6

CC Dow Constantine
Growth Management Planning Council Chair
King County Executive

Dave Upthegrove
Affordable Housing Committee Member
King County Councilmember, District 5

Sunaree Marshall
Affordable Housing Committee Member

King County Dept. of Community and Human Services, Deputy Director of Housing,
Homelessness, and Community Development Division

Valerie Kendall
King County Dept. of Community and Human Services, Planner and Special Projects Manager

Laura Hodgson
Washington State Department of Commerce, Senior Planner

Plan Review Team
King County Affordable Housing Committee

Plan Review Team
Puget Sound Regional Council

Appendix A: Countywide Planning Policies Cited

This letter cites the following Countywide Planning Policies Housing Chapter policies:

H-1 Plan for and accommodate the jurisdiction's allocated share of countywide future housing needs for moderate-, low-, very low- and extremely low-income households as well as emergency housing, emergency shelters, and permanent supportive housing. Sufficient planning and accommodations are those that comply with the Growth Management Act requirements for housing elements in Revised Code of Washington 36.70A.020 and 36.70A.070, that outline regulatory and nonregulatory measures to implement the comprehensive plan (Washington Administrative Code 365-196-650), and that comply with policies articulated in this chapter.

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:

- 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.

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.

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.

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 residential densities, reducing parking requirements, and developing programs, policies, partnerships, and incentives to decrease costs to build and preserve affordable housing.

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.

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.

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.

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:

- 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.

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.

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.

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.