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September 5, 2024

Scott Guter, AICP, LEED AP
Senior Planner
City of Kirkland
123 5th Ave.
Kirkland, WA 98033

Dear Mr. Guter,

Thank you for submitting the City of Kirkland's 2044 Draft Comprehensive Plan to the Affordable Housing Committee's (AHC) Housing-focused Draft Comprehensive Plan Review Program for review on July 2, 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 Draft 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 Kirkland’s draft comprehensive plan. During review, the AHC noted that many of Kirkland’s plans, policies, analyses, and implementation strategies align well with CPP Housing Chapter policies. In particular:

1. The draft plan’s racially disparate impact analysis does an exemplary job of documenting the local history of racially discriminatory housing policies, providing a strong foundation for policies addressing historical inequities identified in the analysis, in alignment with CPPs H-5 and H-9. This includes a policy that commits Kirkland to increasing the ability of all residents to live in the neighborhoods of their choice, by providing access to affordable housing to rent and own throughout the city, “in particular for those populations disproportionately impacted by past discriminatory land use and housing practices” (Policy H-2.1).
2. The draft plan commits Kirkland to enhancing “city-wide inclusionary zoning requirements to provide additional affordable housing units to meet current and future housing needs” (Policy H-1.2). This aligns with CPP H-18, which requires jurisdictions to adopt inclusive planning tools by providing for affordable housing to rent and own throughout the city and evaluating the feasibility of, and implementing inclusionary and incentive zoning to provide affordable housing. The AHC also commends Kirkland staff’s support and potential integration of recommendations in the A Regional Coalition for Housing’s (ARCH) [Middle Housing Affordability Opportunities in East King County](#) report into the draft plan and future regulations.
3. Kirkland’s efforts to remove cost barriers to housing affordability align strongly with CPP H-13 (Policies LU-3.7, 4.2, 4.3, 5.8, H-1.5-9, and H-1.14-18).
4. Kirkland’s draft plan prioritizes transit-oriented development and lays a foundation for increasing densities sufficient to maximize transit investments in the city and increasing income-restricted housing within walking distance of frequent and high-capacity transit, in alignment with CPPs H-16 and H-17 (Policies H-1.10 and H-1.13). The AHC strongly supports the future addition of a Frequent Transit Corridor Overlay to the City’s land use strategy, which would add capacity for “higher-intensity residential uses” along identified frequent transit corridors (Policy LU-2.4). The Supplemental Environmental Impact Statement (SEIS) notes that high-intensity residential uses along these corridors would lower “the overall displacement rate from new development citywide” without significant environmental impacts, in alignment with CPP H-21 (SEIS, pp. 4-15 and 4-71).

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

Recommendation to Align with the CPP Housing Chapter

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

1. Demonstrate capacity for allocated housing needs (CPPs H-1 and H-11)

Relevant Countywide Planning Policies

CPP H-1 requires Kirkland to plan for and accommodate a net new need of 13,200 housing units, including 11,462 housing units that are affordable to households with incomes at or below 80 percent of area median income (AMI) and 2,522 emergency housing beds. 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.

Kirkland's Proposal and AHC Findings

In a memo cited in the draft SEIS, Kirkland reports that land use changes proposed in the draft comprehensive plan will result in 24,862 units of surplus land capacity.¹ Kirkland's draft Land Use Element includes the "Draft Proposed 2044 Land Use" map and definitions of proposed future land use categories, all of which would allow mixed-use developments at varying densities throughout the city (pp.7-8). Based on this information, as well as conversations with City staff, the AHC has the impression that the draft plan proposes significant increases to residential densities throughout the city.

All this said, the draft plan does not include a land capacity analysis demonstrating capacity for 80 to 100, 50 to 80, 30 to 50, and below 30 percent of AMI housing needs, as well as emergency housing needs, as required by CPPs H-1 and H-11. Without this analysis, the AHC cannot confirm in any specificity whether Kirkland is meaningfully planning for and accommodating its housing needs and thus aligns with CPP H-1. In conversations with AHC staff, Kirkland staff indicated that this analysis will be included in the final, adopted plan.

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

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 City of Kirkland's 2044 draft comprehensive plan and related submission materials. Kirkland'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.

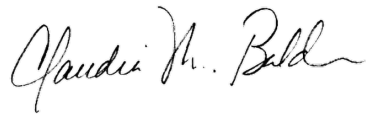
AHC staff are happy to assist Kirkland in addressing these recommendations. For immediate resources and guidance on aligning with the CPP Housing Chapter, refer to the:

- [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.

¹ City of Kirkland. Capacity Analysis Memo. 2024. [\[link\]](#)

Sincerely,



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