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Mayor Bruce Harrell*

December 5, 2024

Angie Mathias  
Long Range Planning Manager  
City of Renton  
1055 South Grady Way  
Renton, WA 98057

Dear Ms. Mathias,

Thank you for submitting the City of Renton's draft Comprehensive Plan to the Affordable Housing Committee's (AHC) Housing-focused Draft Comprehensive Plan Review Program for review on September 23, 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 Renton's draft comprehensive plan. During review, the AHC noted that many of Renton's plans, policies, analyses, and implementation strategies align well with CPP Housing Chapter policies. In particular:

1. In alignment with CPP H-4, Renton's Housing Action Plan thoroughly and clearly evaluates the effectiveness of existing housing policies and strategies to meet the jurisdiction's housing needs, and identifies gaps in existing partnerships, policies, and dedicated resources to meet its housing goals. This includes an analysis of the effectiveness of Renton's existing partnerships, incentives, regulations, plans, statutes, preservation programs, and funding sources and how they will benefit households at different levels of area median income (AMI) (pp.21-35). This analysis sets reasonable expectations that Renton's proposed housing policies and implementation strategies address gaps in partnerships, policies, and dedicated resources to meet its housing needs, as required by CPP H-12.
2. Renton's proposed land use map includes multifamily residential zones *throughout* the jurisdiction. Housing permitted in these zones is more likely to serve low-, very low-, extremely low-, and moderate- income households compared to housing in low-density zones. Allowing multifamily housing throughout the jurisdiction increases the ability of low-income households to live in neighborhoods of their choice, in alignment with CPPs H-18 and H-22.
3. In alignment with CPP H-6, Renton's draft 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 unique partnership with and programmatic support of the Renton Housing Authority, its ongoing membership to South King Housing and Homelessness Partners (SKHHP), and its collaboration with the AHC.

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

### **Recommendations to Align with the CPP Housing Chapter**

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

#### **1. Demonstrate sufficient land capacity (CPPs H-1 and H-11)**

##### Relevant Countywide Planning Policies

CPP H-1 requires the Renton plan for and accommodate 1,062 units affordable to households with incomes at 80 to 100 percent of AMI, 1,205 units affordable to households at 100 to 120 percent of AMI, and 3,248 emergency housing beds. CPP H-11 requires that jurisdictions identify sufficient capacity of land for housing including for moderate-income households and emergency housing.

##### Renton's Proposal and AHC Findings

Renton's draft plan identifies a 1,497-unit deficit in capacity for housing typically affordable to households with incomes between 80 to 120 percent of AMI and does not demonstrate how the City will correct for this deficit. The draft plan therefore does not identify sufficient capacity of land for moderate-income households, as required by CPP H-11.

Renton's draft plan also does not include a land capacity analysis for their 3,248 emergency housing bed need, as required by CPP H-11.

Without identifying sufficient land capacity, the AHC finds that Renton is not meaningfully planning for and accommodating its housing needs for households with incomes between 80 to 120 percent of AMI or its emergency housing needs in alignment with CPP H-1.

**Recommendation 1:** To align with CPPs H-1 and H-11, Renton should identify sufficient land capacity for its emergency housing needs and housing needs for 80 to 100 and 100 to 120 percent AMI households. Renton should follow [Washington State Department of Commerce's guidance](#) for completing this land capacity analysis.

## 2. Meaningfully plan for and accommodate permanent supportive housing (CPP H-1)

### Relevant Countywide Planning Policies

CPP H-1 requires Renton to plan for and accommodate 2,161 permanent supportive housing (PSH) units.

### Renton's Proposal and AHC Findings

Renton's land capacity analysis demonstrates sufficient capacity of land for housing needs at or below 80 percent of AMI, including PSH needs. However, according to Exhibit 7 of Renton's Housing Need Land Capacity and Adequate Provisions appendix, PSH requires a conditional use permit in all residential zones (page 10). RCW 36.130.020(1) states that a city "...may not adopt, impose, or enforce requirements on an affordable housing development that are different than the requirements imposed on housing developments generally."<sup>1</sup> The AHC finds that PSH is affordable housing and therefore Renton cannot require conditional use permits if they do not also do so for housing in general.

**Recommendation 2:** In order to meaningfully plan for and accommodate its permanent supportive housing needs, Renton should align its development code to comply with RCW 36.130.020(1) to ensure Renton is not imposing different requirements on permanent supportive housing than housing generally.

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

### Relevant Countywide Planning Policies

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 (extremely low-income).

### Renton's Proposal and AHC Findings

Renton's draft Housing and Human Services Element includes many policies that are likely to benefit extremely low-income households, including:

- Work with diverse partners, including the Renton Housing Authority, South King Housing and Homelessness Partners (SKHHP), and nonprofit housing developers, to address housing needs (Policy HHS-1).
- Implement zoning provisions that allow for a range of housing types at different densities and prices that address the housing needs of all people (Policy HHS-4).

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<sup>1</sup> RCW 36.130.020. [\[link\]](#)

- Collaborate with regional housing authorities, SKHHP, other cities, and community stakeholder to develop strategies to achieve a diverse housing stock that meets Renton’s housing targets [sic] for each economic segment (Policy HHS-6).

Outside of the draft comprehensive plan, Renton’s adopted Housing Action Plan outlines how existing partnerships, incentives, regulations, plans, statutes, preservation programs, and funding sources benefit households at different economic segments, including extremely low-income households (pp.21-35). The Housing Action Plan also includes numerous recommendations to meet housing goals, many of which are likely to benefit extremely low-income households (pp.82-94).

Submission materials also detail various investments in affordable housing programs that Renton will make using additional sales and use tax revenue authorized by RCW 82.14.530 (Renton Support for Ordinance 5983 Sales Tax Funding, pp.39-41). Investments likely to benefit extremely low-income households include:

- targeted property acquisition and coordination with the Renton Housing Authority and other affordable housing development partners;
- capital and maintenance funding for the Renton Housing Authority; and
- a pilot rental assistance program;

However, none of these policies or strategies submitted to the AHC explicitly *prioritize* extremely low-income households, as required by CPP H-2.

**Recommendation 3:** To align with CPP H-2, Renton should amend the policies and implementation strategies in its draft Housing and Human Services Element to prioritize the need for housing affordable to extremely low-income households. For examples of strategies Renton could use to align with CPP H-2, see the CPP Housing Chapter Technical Appendix.<sup>2</sup>

#### 4. 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.

##### Renton’s Proposal and AHC Findings

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

- b) number of existing housing units by bedrooms and condition; and
- c) number of existing emergency housing, emergency shelters, and permanent supportive housing facilities and units or beds, as applicable;

This analysis should inform additional comprehensive plan policy responses and strategies. For example, analysis responsive to CPP H-3(c) could inform the emergency land capacity analysis that Renton must complete in order to align with CPPs H-1 and H-11 (see recommendation 1).

**Recommendation 4:** Renton should include all inventory and analysis components required by CPP H-3 in its comprehensive plan and summarize the findings in the Housing Element. This additional analysis should inform comprehensive plan policy responses and strategies.

## **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 Renton’s draft comprehensive plan and related submission materials. Renton’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.

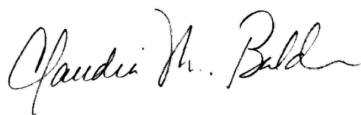
AHC staff are happy to assist Renton in addressing these recommendations. For immediate resources and guidance on aligning with the CPP Housing Chapter, refer to the:

- [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 Renton 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, Renton is encouraged to amend its plan in 2025 to incorporate AHC feedback and bring its plan into alignment with the King County 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](mailto:AHCplanreview@kingcounty.gov) or 206-848-0681.

Sincerely,



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