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October 3, 2024

Kate Kaehny
Principal Planner
City of SeaTac
4800 South 188th St.
SeaTac, WA, 98188

Dear Ms. Kaehny,

Thank you for submitting the City of SeaTac's draft Envision SeaTac 2044 comprehensive plan update to the Affordable Housing Committee's (AHC) Housing-focused Draft Comprehensive Plan Review Program for review on July 29, 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 SeaTac's draft comprehensive plan. During review, the AHC noted that many of SeaTac's plans, policies, analyses, and implementation strategies align well with CPP Housing Chapter policies. In particular:

1. The draft plan's focus on expanding housing density near high-capacity transit areas demonstrates a strong alignment with CPPs H-16 and H-17, which require jurisdictions to expand the supply and range of housing types, including affordable units, at densities sufficient to maximize the benefits of transit investments throughout the county, and to support the development and preservation of income-restricted housing within walking distance of frequent transit.
2. SeaTac's draft plan includes policies and implementation strategies to provide a diverse range of housing types and densities to meet the varied needs of its residents within newly designated Neighborhood Residential zones. This strategy aligns with CPP H-18, by ensuring that housing options are distributed *throughout* the city, with particular attention to transit-accessible and high-opportunity areas.
3. SeaTac's Racially Disparate Impact (RDI) analysis aligns strongly with several CPPs, particularly H-5, H-9, and H-19. This includes the City's acknowledgment of restrictive covenants in neighborhoods like McMicken Heights, Sunnydale Gardens, and Angle Lake Shore Acres. Additionally, the draft plan adopts intentional, target actions to repair harm to Black, Indigenous, and People of Color (BIPOC) households from past racially exclusive and discriminatory land use and housing practices. Notably, the plan outlines proactive steps to promote homeownership opportunities through partnerships with Habitat for Humanity and South King Housing and Homelessness Partners (SKHHP), in alignment with CPP H-19.
4. SeaTac's draft comprehensive plan outlines 131 implementation strategies for CPP policies requiring implementation or adoption. These strategies help set reasonable expectations that SeaTac will achieve a material, positive change in its ability to meet housing needs, in alignment with CPP H-26.

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

Recommendations to Align with the CPP Housing Chapter

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

1. 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.

SeaTac's Proposal and AHC Findings

While SeaTac's submission includes many data points and substantive analysis, the AHC could not find specific information required by CPPs H-3(d), (e), (f), (h), (i), (j). This includes:

- d. the percentage and geographic distribution of residential land zoned for moderate- and high-density housing and accessory dwelling units;

- e. the number of income-restricted units and, where feasible, the total number of units within a half-mile walkshed of high-capacity or frequent transit service and regional and countywide centers;
- f. household characteristics by race/ethnicity, including income (median and by area median income bracket), tenure (renter or homeowner), and housing cost burden and severe housing cost burden;
- h. projected population growth by race/ethnicity, age, and disability status;
- i. housing development capacity within a half-mile walkshed of high-capacity or frequent transit service; and
- j. the ratio of housing to jobs within the jurisdiction;

SeaTac staff have informed the AHC that project consultants are currently undertaking the data collection and analyses needed to fully address all of the inventory and analysis components required by CPP H-3, and that the City will include the summarized findings in the Housing Element.

Recommendation 1: SeaTac should include all inventory and analysis components as required by CPP H-3 and summarize the findings in the Housing Element. This additional analysis should inform additional 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 the City of SeaTac’s draft Envision SeaTac 2044 and related submission materials. SeaTac’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.

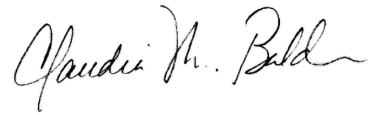
AHC staff are happy to assist SeaTac in addressing these recommendations. For immediate resources and guidance on aligning with the CPP Housing Chapter, refer to the:

- [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 SeaTac 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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King County Councilmember, District 6

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