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March 6, 2025

Eric Jensen
Town of Skykomish Consulting Planner
EJ Municipal Land Use Planning
PO Box 2056
Kirkland, WA 98083

Dear Mr. Jensen,

Thank you for submitting the Town of Skykomish's 2024 draft comprehensive plan to the Affordable Housing Committee's (AHC) Housing-focused Draft Comprehensive Plan Review Program for review on December 9, 2024, and a final adopted comprehensive plan on February 12, 2025. 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 Skykomish’s comprehensive plan. Below, the AHC includes recommendations necessary for Skykomish to align with the CPP Housing Chapter policies.

Recommendations to Align with the CPP Housing Chapter

The AHC recommends Skykomish take the following actions to align its comprehensive plan with CPP Housing Chapter goals and policies. The Skykomish Town Council adopted its comprehensive plan on February 10, 2025. Skykomish should amend its plan in 2025 to address AHC feedback to bring its plan into alignment with the King County CPP Housing Chapter policies.

1. Incentivize and prioritize resources for income-restricted housing (CPPs H-1, H-9, H-10, H-11, and H-14)

Relevant Countywide Planning Policies

CPP H-1 requires Skykomish to plan for and accommodate five units of housing affordable to households at or below 80 percent of area median income (AMI). CPP H-10 requires jurisdictions adopt policies, incentives, strategies, actions, and regulations that increase the supply of long-term income-restricted housing for extremely low-, very low-, and low-income households and households with special needs. CPP H-11 requires that jurisdictions identify sufficient capacity of land for moderate-, low-, very low-, and extremely low-income households. CPP H-14 requires jurisdictions 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 and consider projects that promote access to opportunity, anti-displacement, and wealth building for Black, Indigenous, and People of Color communities to support implementation of CPP H-9. CPP H-9 requires jurisdictions 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 and promote equitable outcomes in partnership with communities most impacted.

Skykomish’s Plan and AHC Findings

Skykomish’s adopted housing appendix identifies limited housing options for households below 80 percent of AMI, and no existing units of income-restricted housing within the town. The plan, however, takes steps to plan for and accommodate future housing below 80 percent of AMI by identifying sufficient capacity for housing types typically affordable to this income group, in alignment with CPPs H-1 and H-11. Notably, the majority of this capacity for housing types most typically affordable to households below 80 percent of AMI is found in a newly-designated Mixed-Use zone in the town’s center, which encompasses just one parcel owned by the Town.

Considering Skykomish’s size, land capacity, and limited resources available to support the development of housing affordable to households below 80 percent of AMI (typically income-restricted housing), the AHC sees the Town’s new Mixed-Use zone and the Town-owned parcel within it as a unique opportunity for Skykomish to meaningfully plan for and accommodate housing needs below 80 percent of AMI. In addition, the Town is uniquely positioned to adopt meaningful policies, incentives, strategies, actions, and regulations that could increase the supply of long-term income-restricted housing within the new Mixed-Use zone, in alignment with CPP H-10, and to prioritize local resources for income-restricted housing development, in alignment with CPP H-14.

However, the plan does not commit the Town to adopt incentives or use this publicly-owned site for income-restricted housing. Policy H-P10 broadly commits the Town to supporting “the prioritization of

housing needs for extremely low-income households by encouraging private-public affordable housing projects in zoning districts which can accommodate high density residential development.” The AHC finds that because this policy does not mention the Mixed-Use zone or the Town-owned parcel, the plan does not set reasonable expectations that Skykomish will meaningfully plan for and accommodate its housing needs below 80 percent of AMI. Specifically, the plan does not meaningfully prioritize limited local resources for income-restricted housing, as required by CPP H-14, and adopt policies, incentives, strategies, actions, and regulations that will increase the supply of income-restricted housing, as required by CPP H-10.

Recommendation 1: To align with CPPs H-1, H-10, and H-14, Skykomish should amend the plan in 2025 to include a policy that commits the Town to adopting policies, incentives, strategies, actions, and regulations that will increase the supply of income-restricted housing in the Town’s newly designated Mixed-Use zone and prioritize the publicly-owned parcel within it for income-restricted housing development.

2. Complete the housing inventory and analysis (CPP H-3)

Relevant Countywide Planning Policy

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.

Skykomish’s Plan and AHC Findings

The AHC could not find specific information required by CPP H-3(f), (g), (j), and (l) in Skykomish’s plan. This includes:

- f) household characteristics by race/ethnicity, including income, tenure, and housing cost burden and severe housing cost burden;
- g) current population characteristics by race/ethnicity and disability;
- j) ratio of housing to jobs in the jurisdiction; and
- l) the number of people experiencing homelessness.

According to the adopted housing appendix and housing needs assessment, Skykomish did not include analysis required by CPP H-3 (f), (g), and (j) because of the town’s small population and high margins of error in available data from the US Census. However, the AHC finds that it would be valuable for Skykomish to include this data and acknowledge high margins of error, to align with requirements of CPP H-3. There is also available data on the number of people experiencing homelessness at a subregional scale that Skykomish may use to fulfill the requirements of CPP H-3(l).¹

Importantly, data required by CPP H-3 informs other analyses and policies required by the CPP Housing Chapter. For example, information on Skykomish’s household characteristics by race/ethnicity and income, including income, housing cost burden and severe housing cost burden should inform the Town’s identification of local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing, including zoning that may have a discriminatory effect, disinvestment, and infrastructure availability, as required by CPP H-5.

¹ All Home (2020). *Count Us In, Seattle/King County Point-in-Time Count of Individuals Experiencing Homelessness*. pp.22-23 [\[link\]](#)

Recommendation 2: Skykomish should amend the adopted housing appendix and housing needs assessment, to include all inventory and analysis components as required by H-3 in the comprehensive plan and summarize the findings in the Housing Element. For the requirements of CPP H-3(f), (g), and (j), Skykomish should employ publicly available resources from the American Community Survey 2019-2024 5 Year estimates and note high margins of error when present. Skykomish should note high margins of errors in data when applicable. For CPP H-3(l), Skykomish may use subregional point in time counts available in All Home’s 2020 [Count Us In](#) report (pp.22-23). Additional analysis should inform additional comprehensive plan policy responses and strategies.

3. Identify gaps in existing partnerships, policies, and dedicated resources to meet housing needs (CPPs H-4, H-12, and H-20)

Relevant Countywide Planning Policies

CPP H-4 requires jurisdictions to evaluate the effectiveness of existing housing policies and strategies to meet the jurisdiction’s housing needs and 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. CPPs H-12 and H-20 require jurisdictions to 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 and eliminate racial and other disparities in access to housing and neighborhoods of choice.

Skykomish’s Plan and AHC Findings

The adopted housing needs assessment of Skykomish’s comprehensive plan analyzes historic development patterns in order to evaluate the effectiveness of existing policies to meet housing needs and eliminate racial and other disparities in access to housing and neighborhoods of choice. The analysis concludes that “there is generally insufficient housing production for higher density housing options in Skykomish...likely due to the fact that Skykomish is in a generally more rural setting and doesn’t have an overly high demand for higher density housing.” The analysis also notes that the Town can encourage more production “by ensuring there aren’t barriers in the municipal code that would prevent these housing types from being built.” The analysis concludes by identifying environmental conditions, such as the town’s surrounding mountainous terrain, as significant barriers to future housing development (page 18).

The AHC finds that the provided analysis does not meaningfully address CPP H-4, because it does not include an analysis of policy effectiveness or of gaps in partnerships, policies, and dedicated resources for meeting housing needs and eliminating racial and other disparities in access to housing and neighborhoods of choice. Without these analyses, the AHC cannot assess if submitted policies and implementation strategies are meaningfully:

- improving the effectiveness of existing housing policies and strategies to meet housing needs, as required by CPP H-12; and
- addressing gaps in partnerships, policies, and dedicated resources to meet the jurisdiction’s housing needs and eliminate racial and other disparities in access to housing and neighborhoods of choice, as required by CPPs H-12 and H-20.

Recommendation 3: To align with CPP H-4, Skykomish should include an analysis of policy effectiveness to meet housing needs and of gaps in partnerships, policies, and dedicated resources to meet housing needs and eliminate disparities in access to housing and neighborhoods of choices. In response to this analysis, Skykomish should then amend its plan in 2025 to include policies and implementation strategies 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 and eliminate racial and other disparities in access to housing and neighborhoods of choice, as required by CPPs H-12 and H-20.

Please see the Washington State Department of Commerce’s [“Adequate Provisions Checklist”](#) as a guide for how Skykomish could conduct a gap analysis to address gaps in partnerships, policies, and dedicated resources.

4. Document the local history of racially exclusive and discriminatory land use and housing practices, conduct a racially disparate impact analysis, and take intentional targeted actions to repair harm (CPPs H-5 and H-9)

Relevant Countywide Planning Policies

CPP H-5 requires jurisdictions to document the local history and impact of racially exclusive and discriminatory land use and housing practices; explain the extent to which that history is still reflected in current development patterns, housing conditions, tenure, and access to opportunity; identify local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing, including zoning that may have a discriminatory effect, disinvestment, and infrastructure availability; and demonstrate how current strategies are addressing impacts of those racially exclusive and discriminatory policies and practices.

CPP H-9 requires jurisdictions to adopt intentional, targeted actions that repair harms to Black, Indigenous, and People of Color households from identified past and current racially exclusive and discriminatory land use and housing practices.

Skykomish’s Plan and AHC Findings

Skykomish’s housing appendix and housing needs assessment include:

- a description of state requirements to complete a racially disparate impact analysis;
- a description of how past policies and practices have resulted in racially disparate impacts, displacement, and exclusion in housing nationally and countywide;
- an analysis of the use of racially restrictive covenants in Skykomish;
- information on the racial demographics of Skykomish’s population; and
- an analysis of goals and policies for apparent racially exclusive language (pp. 9-11).

As mentioned in recommendation 2, however, Skykomish’s plan does not include data on household characteristics by race/ethnicity. The lack of data disaggregated by race and ethnicity makes it difficult to assess if local policies may be resulting in racially disparate impacts (e.g., disparities in homeownership, cost burden, and displacement risk) or if Skykomish is addressing impacts of racially exclusive and discriminatory policies and practices, as required by CPP H-5. Additionally, the plan does not document the *local* history of racially exclusive and discriminatory land use and

housing practices or explain the extent to which the history of racially exclusive and discriminatory land use and housing practices is still reflected in current development patterns, housing conditions, tenure, and access to opportunity, also required by CPP H-5.

Without these analyses, the AHC cannot assess whether Skykomish’s plan meaningfully takes intentional, targeted actions to repair harm to Black, Indigenous, and People of Color households from past racially exclusive and discriminatory land use and housing practices, in alignment with CPP H-9.

Recommendation 4: To align with CPP H-5, Skykomish should amend its plan in 2025 to:

- document the local history of racially exclusive and discriminatory land use and housing practices within their jurisdiction;
- explain the extent to which the history is still reflected in current development patterns, housing conditions, tenure, and access to opportunity;
- identify local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing, including zoning that may have a discriminatory effect, disinvestment, and infrastructure availability; and
- demonstrate how current strategies are addressing impacts of those racially exclusive and discriminatory policies and practices.

See the [Resources for Documenting the Local History of Racially Exclusive and Discriminatory Land Use and Housing Practices](#) document for assistance.

To align with CPP H-9, Skykomish should amend the plan in 2025 to include or clarify how proposed actions are targeted to repair harms identified in the Town’s racially disparate impacts analysis. For strategies to align with CPP H-9, see the CPP Housing Chapter Technical Appendix.²

5. Work cooperatively with Puget Sound Regional Council, subregional collaborations, and other entities to support the development, implementation, and monitoring of strategies (CPP H-7)

Relevant Countywide Planning Policy

CPP H-7 requires jurisdictions work cooperatively with Puget Sound Regional Council (PSRC), subregional collaborations, and other entities that provide technical assistance to local jurisdictions to support the development, implementation, and monitoring of strategies that achieve the goals of the CPP Housing Chapter.

Skykomish’s Plan and AHC Findings

Skykomish’s submission does not include a policy that aligns with CPP H-7. In the Town’s original submission, the Town noted that adding a policy that aligns with CPP H-7 was needed in order to align with the CPP Housing Chapter; however, the adopted plan does not include an aligned policy.

² King County Countywide Planning Policies Appendix 4: Housing Technical Appendix, pp. 74 [\[link\]](#)

Recommendation 5: To align with CPP H-7, Skykomish should amend its plan in 2025 to include policies that commit the Town to work collaboratively with PSRC, subregional collaborations, and other entities to provide technical assistance to jurisdictions like Skykomish to support the development, implementation, and monitoring of strategies that achieve the goals of the CPP Housing Chapter.

6. Collaborate with populations most disproportionately impacted by housing cost burden (CPP H-8)

Relevant Countywide Planning Policy

CPP H-8 requires all jurisdictions to collaborate with populations most disproportionately impacted by housing cost burden in developing, implementing, and monitoring strategies that achieve the goals of the CPP Housing Chapter and prioritize the needs and solutions articulated by these disproportionately impacted populations.

Skykomish's Plan and AHC Findings

Skykomish's submission does not contain information on the Town's engagement with communities most disproportionately impacted by housing cost burden during plan development. The plan also does not include a policy or implementation strategy that commits the Town to collaborating with populations most disproportionately impacted by housing cost burden and prioritizing the needs and solutions articulated by these populations, as required by CPP H-8.

Recommendation 6: To align with CPP H-8, Skykomish should amend its plan in 2025 to provide detail on input collected from the community engagement process and clarify how the plan prioritizes the needs of populations most disproportionately impacted by housing cost burden. The plan should also include policies to collaborate with populations most disproportionately impacted by housing cost burden and to prioritize the needs and solutions that they articulate, including both current residents and populations unable to afford housing within the town.

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

Relevant Countywide Planning Policy

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

Skykomish's Plan and AHC Findings

Skykomish submitted twelve implementation strategies, many of which commit the Town to "collaborate," "support," and "work with" other entities to achieve broad goals. In other cases, strategies read like goals or policies and not as concrete, measurable actions that the Town will take to achieve the goals and policies of the plan and advance those of the CPP Housing Chapter.

Given this, the AHC finds that, taken together, submitted implementation strategies do not provide enough detail or commit the Town to concrete enough actions that the AHC, Town staff, elected officials, and other interested parties, could use to meaningfully assess Skykomish's progress to plan for and accommodate its housing needs in the years ahead.

Recommendation 7: To align with CPP H-27, Skykomish should submit more detailed implementation strategies that outline discrete actions AHC staff can measure annually. Skykomish may provide updated implementation strategies to the AHC in early 2025.

Conclusion and AHC Resources

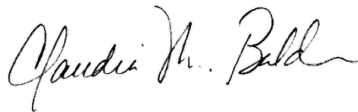
Thank you again for your submission to the Committee’s Housing-focused Draft Comprehensive Plan Review Program. AHC members valued the opportunity to review Skykomish’s 2024 comprehensive plan update and related submission materials. Skykomish’s participation in the plan review program is instrumental 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 Skykomish 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,



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Affordable Housing Committee Chair
King County Councilmember, District 6

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