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October 3, 2024

Neil Tabor, AICP
Senior Planner
City of Tukwila
6200 Southcenter Boulevard
Tukwila, WA 98188

Dear Mr. Tabor,

Thank you for submitting the City of Tukwila's draft Comprehensive Plan to the Affordable Housing Committee's (AHC) Housing-focused Draft Comprehensive Plan Review Program for review on August 8, 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 Tukwila’s draft comprehensive plan. During review, the AHC noted that many of Tukwila’s plans, policies, analyses, and implementation strategies align well with CPP Housing Chapter policies. In particular:

1. Tukwila’s housing inventory and land capacity analysis provide a solid foundation for the draft plan. The detailed review of existing housing stock, land availability, and potential for future development demonstrates a clear commitment to planning for and accommodating the city’s current and future needs, as required by CPPs H-1 and H-11.
2. Tukwila’s draft plan prioritizes economic development and job creation, particularly in areas designated for mixed-use and industrial development. The focus on integrating high-tech, office, retail, and residential uses within the Tukwila South Overlay area is a strategic approach to creating a multi-use employment center that can drive economic growth and provide opportunities for residents. This strategy aligns with CPP H-15, which emphasizes the importance of increasing housing choices near major employment centers to improve the jobs-housing balance.

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

Recommendations to Align with the CPP Housing Chapter

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

1. Plan for and accommodate housing needs (CPP H-1)

Relevant Countywide Planning Policies

CPP H-1 requires Tukwila plan for and accommodate its 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.

Tukwila’s Proposal and AHC Findings

Policy H2.2 states that Tukwila will “encourage housing development to all income segments sufficient to meet needs consistent with adopted targets.” However, CPP H-1 requires that jurisdictions *plan for and accommodate* allocated housing needs for moderate-, low-, very low-, and extremely low-income households, as well as emergency housing, emergency shelters, and permanent supportive housing needs.

Recommendation 1: To align with CPP H-1, Tukwila should also commit to planning for and accommodating moderate-, low-, very low-, and extremely low-income housing needs, not just growth targets, as well as emergency housing, emergency shelters, and permanent supportive housing needs in Policy H2.2.

2. Identify sufficient capacity of land for emergency housing needs (CPPs H-1 and H-11)

Relevant Countywide Planning Policies

CPP H-1 requires Tukwila plan for and accommodate 1,748 net new housing units, including 1,242 emergency housing beds. CPP H-11 requires jurisdictions identify sufficient capacity of land for emergency housing.

Tukwila's Proposal and AHC Findings

The draft plan's Housing Background Report identifies that Tukwila lacks adequate capacity to accommodate its target of emergency shelter and emergency housing. It also identifies intensity of use and spacing requirements that serve as barriers to the development of emergency housing facilities (page 39). Policies and associated implementation strategies in the draft plan address this gap, including a commitment in implementation strategy H2.(4.5).1 to "review and amend regulations and fees for emergency shelters, transitional housing, emergency housing, and permanent supportive housing (STEP Housing) through code amendments and to ensure capacity and feasibility of STEP Housing development."

However, Tukwila did not include an emergency housing capacity analysis. Without this analysis, the AHC cannot determine if Tukwila is planning for and accommodating its emergency housing need and has sufficient land capacity to accommodate its emergency housing need allocation, as required by CPP H-11.

Recommendation 2: To align with CPPs H-1 and H-11, Tukwila should show sufficient land capacity for its allocated emergency housing needs. Tukwila should follow [Washington State Department of Commerce's guidance](#) for completing an emergency housing land capacity analysis.

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

Relevant Countywide Planning Policies

CPP H-1 requires that Tukwila plan for and accommodate 1,367 units affordable to households below 30 percent of area median income (AMI). CPP H-2 requires Tukwila to prioritize the need for housing affordable to households less than or equal to 30 percent AMI (extremely low-income).

Tukwila's Proposal and AHC Findings

The draft plan demonstrates sufficient capacity for 0 to 30 percent of AMI housing needs. However, the AHC is concerned that policies and implementation strategies in the draft plan do not prioritize 0 to 30 percent of AMI housing needs. Specifically, Tukwila indicates that Housing Element policy H2.1 and H2.2 and implementation strategy H2.(1-3).1 address CPP H-2. Policy H2.1 states that Tukwila will encourage production in all neighborhoods of diverse housing types that are appropriate for residents in all stages of life and all household sizes. H2.1. states that Tukwila will encourage development affordable to all income segments sufficient to meet needs consistent with adopted targets. Neither of these policies names housing affordable to 0 to 30 percent of AMI households or demonstrates a clear prioritization of extremely low-income households. Implementation strategy H2.(1-3).1, which commits Tukwila to amend its residential development standards to incentivize broader diversity of housing types, increase incentives for affordable housing, and reduce

regulations that increase housing development cost, also does not mention extremely low-income households.

Recommendation 3: To align with CPP H-2, Tukwila should explicitly prioritize the housing needs of extremely low-income households in plan policies and implementation strategies. For examples of strategies Tukwila could use to align with CPP H-2, see the CPP Housing Chapter Technical Appendix.¹

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.

Tukwila's Proposal and AHC Findings

While Tukwila's submission includes many data points and substantive analysis, the AHC could not find specific information required by CPPs H-3(b), (g), (m). This includes:

- b. the number of existing housing units by condition;
- g. population age by race/ethnicity; and
- m. the housing needs of communities experiencing disproportionate harm of housing inequities including Black, Indigenous, and People of Color.

This analysis should inform additional comprehensive plan policy responses and strategies. For example, analysis responsive to CPP H-3(m) could help Tukwila further identify and address gaps in existing partnerships, policies, and dedicated resources for eliminating racial and other disparities in access to housing and neighborhoods of choice, as required by CPP H-4 and H-20.

Recommendation 4: Tukwila 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.

5. Identify and address gaps in policies to meet the jurisdiction's housing needs (CPPs H-4, H-12, and H-13)

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. CPP H-12 requires jurisdictions to 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. CPP H-13 requires jurisdictions to implement strategies to overcome cost barriers to housing affordability.

¹ Washington State Department of Commerce (2023 August). *Guidance for Updating Your Housing Element*. Page 33. [\[link\]](#)

Tukwila's Proposal and AHC Findings

Tukwila's draft Housing Background Report discusses barriers to housing development, specifically housing affordable to incomes below 80 percent of AMI (pp. 36-37). The report also proposes strategies to enable greater affordable housing production, including reducing restrictive development requirements, streamlining development and design review processes, and providing incentives for affordable housing development (pp.37-38).

However, this discussion does not outline specific gaps in policy effectiveness, existing partnerships, and dedicated resources, nor specific cost barriers to housing affordability to which outlined strategies are meant to respond. The draft plan also does not commit the City to implementing any strategies identified in the Housing Background Report. Instead, the draft plan generally proposes to "identify and remove excessive regulatory barriers to housing production" (Policy H1.2), "modify residential zoning designations and development standard to align with city goals" (Policy H1.3) and "pursue establishing, or expanding, programs to provide tax incentives for increased housing development" (Policy H3.2). Therefore, the AHC finds that the draft plan does not meaningfully:

- 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 to meet housing needs, as required by CPP H-4;
- adopt and implement policies that improve the effectiveness of existing housing policies and strategies and address gaps in existing partnerships, policies, and dedicated resources for meeting the jurisdiction's housing needs, as required by CPP H-12; and
- implement strategies to overcome cost barriers to housing affordability, as required by CPP H-13.

Recommendation 5: To align with CPP H-4, Tukwila should include an analysis that identifies specific gaps in 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.

This analysis should inform draft policies and implementation strategies that address CPPs H-12 and H-13. Tukwila should commit to addressing specific gaps in adopted policies and implementation strategies. Tukwila may provide updated implementation strategies to the AHC in 2025.

Please see the Washington State Department of Commerce's "[Adequate Provisions Checklists](#)" as a guide for how Tukwila could conduct a gap analysis and address gaps in policies and strategies.

6. Prioritize the use of local and regional resources for income-restricted housing (CPP H-14)

Relevant Countywide Planning Policies

CPP H-14 requires jurisdictions prioritize the use of local and regional resources (e.g. funding, surplus property) for income-restricted housing, particularly extremely low-income households, populations with special needs, and others with disproportionately greater housing needs.

Tukwila’s Proposal and AHC Findings

Tukwila indicated in their submitted completeness checklist and implementation strategies that draft policy H2.2 and implementation strategy H2.(1-3).1 address the requirements of CPP H-14. Draft policy H2.2. states that the City will “encourage housing development affordable to all income segments sufficient to meet needs consistent with adopted targets.” Implementation strategy H2.(1-3).1 commits Tukwila to amend its residential development standards to incentivize broader diversity of housing types, increase incentives for affordable housing, and reduce regulations that increase housing development cost.

Neither the policy nor implementation strategy demonstrates an intention to prioritize local or regional *resources*, such as funding or surplus public land, for income-restricted housing. Policy H2.2 and implementation strategy H2.(1-3).1 also do not mention regional or local resources or refer to extremely low-income households, populations with special needs, or other groups with disproportionately greater housing needs.

Recommendation 6: To align with CPP H-14, Tukwila should include a policy and implementation strategy that commits Tukwila to prioritizing available resources for income-restricted housing (e.g. funding, surplus property), particularly extremely low-income households, populations with special needs, and others with disproportionately greater housing needs. For strategies to align with CPP H-14, see the CPP Housing Chapter Technical Appendix.²

7. Expand and support the supply of income-restricted housing near high-capacity and frequent transit while mitigating displacement (CPPs H-16, H-17, H-21, and H-23)

Relevant Countywide Planning Policies

CPP H-16 requires 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. CPP H-17 requires jurisdictions to support development and preservation of income-restricted affordable housing near high-capacity transit. CPP H-21 requires that jurisdictions adopt policies and strategies that promote equitable development and mitigate displacement risk; mitigate displacement that may result from planning efforts, large-scale private investment, and market pressure; and implement anti-displacement policies prior to or concurrent with development capacity increases and public capital investments. CPP H-23 requires that jurisdictions adopt and implement policies that protect housing stability for renter households and expand protections and supports for moderate-, low-, very low-, and extremely low-income renters and renters with disabilities.

Tukwila’s Proposal and AHC Findings

Tukwila’s draft plan’s future land use map (FLUM) proposes both “High Density Residential” and “Regional Commercial Center” zones—both of which allow for housing types typically affordable to households below 80 percent of AMI—in close proximity to the Tukwila International Boulevard Link light rail station. The FLUM also proposes maintaining high-density residential districts along frequent and high-capacity transit routes, include Metro’s RapidRide. The draft plan designates the zone in immediate proximity to the city’s Sounder station as a “Tukwila Urban Center – Transit

² King County Countywide Planning Policies Appendix 4: Housing Technical Appendix, page 92. [\[link\]](#)

Oriented Development” zone which contains a substantial portion of the city’s total capacity for housing types typically affordable to households earning less than or equal to 80 percent of AMI.

The AHC commends these efforts to orient future housing development around frequent and high-capacity transit; however, the AHC finds that proposed plan does not meaningfully expand the supply and range of housing types, including affordable units, at densities sufficient to maximize the benefits of these transit investments, particularly light rail and RapidRide, as required by CPP H-16. The plan also does not meaningfully support the development and preservation of income-restricted affordable housing that is within walking distance of these existing high-capacity and frequent transit investments, as required by CPP H-17.

Specifically, the draft plan maintains low-density zones within one-quarter and one-half-mile buffers of its existing light rail station, RapidRide stops, and frequent transit stops, particularly along International Boulevard directly south of State Route 518 and west of State Route 599 (Housing Background Report, page 36). Many of these areas are also designated as “qualified census tracts” by the Department of Housing and Urban Development, which are more likely to see federal low-income housing tax credit investment than others (Housing Background Report, page 6). The draft plan also does not commit to adopting any specific incentives for affordable development within zones near transit, despite discussing such incentives in the Housing Background Report (page 37).

The AHC recognizes that Tukwila has identified areas nearby International Boulevard as at high risk of potential displacement and that increased development capacity sufficient to maximize nearby transit investments could result in unintended displacement of low-income renters, immigrant households, and communities of color from homes and businesses (Housing Background Report, pp.32-34). However, the AHC considers low-income housing development to be a key anti-displacement strategy. There is also potential for Tukwila to implement new tenant protections and other displacement mitigation and equitable development measures to support potentially impacted communities, in alignment with CPPs H-21 and H-23.

Recommendation 7: To align with CPPs H-16 and H-17, Tukwila should amend, edit, or propose new land use and housing element policies and implementation strategies to support the development and preservation of affordable housing near its existing light rail and RapidRide stations. The City should also implement new, higher density zones or overlays and affordable housing incentives that would support the development and preservation of affordable housing near transit.

Concurrent with development capacity increases, Tukwila should implement measures that mitigate the involuntary relocation of residents, cultural assets, and businesses from their current locations and promote equitable development in areas at high-risk of displacement, particularly nearby to International Boulevard, in alignment with CPP H-21. Tukwila should also expand renter protections, in alignment with CPP H-23. For strategies to align with CPPs H-21 and H-23, see the CPP Housing Chapter Technical Appendix.³

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 Tukwila’s draft Comprehensive Plan

³ King County Countywide Planning Policies Appendix 4: Housing Technical Appendix, pp. 99-101. [\[link\]](#)

and related submission materials. Tukwila’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.

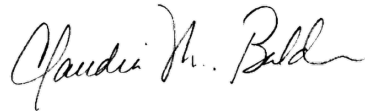
AHC staff are happy to assist Tukwila in addressing these recommendations. For immediate resources and guidance on aligning with the CPP Housing Chapter, refer to the:

- [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 Tukwila 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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