



King County Affordable Housing Committee
**Housing-Focused Draft Comprehensive
Plan Review Guide**

Last updated May 31, 2024

Contents

- Introduction 3
- Planning Framework 5
- Comprehensive Plan Review Process 7
- Aligning with Comprehensive Plan Review Standards 12
- Example Framework to Evaluate Meaningful Responses 16
- Common Gaps from AHC Review of Draft Comp Plans 20
- Frequently Asked Questions 25
- Resources 34

Introduction

[The Affordable Housing Committee](#) (AHC) is implementing a housing-focused draft comprehensive plan review program (plan review program), as established by the King County Countywide Planning Policies (CPP) Housing Chapter Policy H-26. The purpose of the program is to:

- offer early guidance and assistance to jurisdictions on comprehensive plan alignment with the CPP Housing Chapter;
- ensure plans address all Housing Chapter goals and policies and include required analyses;
- evaluate the meaningfulness of public review draft comprehensive plan responses to policies in this chapter, where meaningful responses can be reasonably expected to achieve a material, positive change in the jurisdiction's ability to meet housing needs; and
- collect data on jurisdictional implementation details to inform future AHC and Growth Management Planning Council (GMPC) monitoring and evaluation during the remainder of the planning period.

This guide details the process and standards used by the AHC for comprehensive plan review and provides resources for jurisdictions as they draft comprehensive plan updates. This guide is a working document and may be updated to incorporate lessons learned and feedback received during the review of draft plans. At a high level:

- AHC staff are available to provide technical assistance as jurisdictions draft their comprehensive plans and materials for AHC review;
- Jurisdictions submit the housing-related components of their draft comprehensive plan, a draft land use map, a [CPP completeness checklist](#), and an [implementation strategies workbook](#) for review;
- Jurisdictions will receive a comment letter on how their draft plan aligns with the CPP Housing Chapter that may include recommendations or suggestions to improve alignment; and
- Jurisdictions will incorporate feedback and adopt their plan.

The AHC recognizes jurisdictions in King County are working to comply with many new requirements for the 2025-2044 comprehensive planning period. Jurisdictions may face challenges submitting public review draft plans to the AHC early enough to receive and incorporate feedback. The AHC may not approve a comment letter with enough time for the jurisdiction to address the AHC's recommendations before the state-mandated deadline. **AHC staff are committed to working collaboratively with jurisdiction staff and providing flexibility whenever feasible.**

The AHC also understands jurisdictions face significant and structural barriers to meeting their housing needs over the planning period, including:

- Housing needs for the lowest-income households are unlikely to be met without significant new funding for income-restricted housing.
- Shifts in housing markets and the economy can occur unexpectedly, driven by forces outside of a jurisdiction's control.

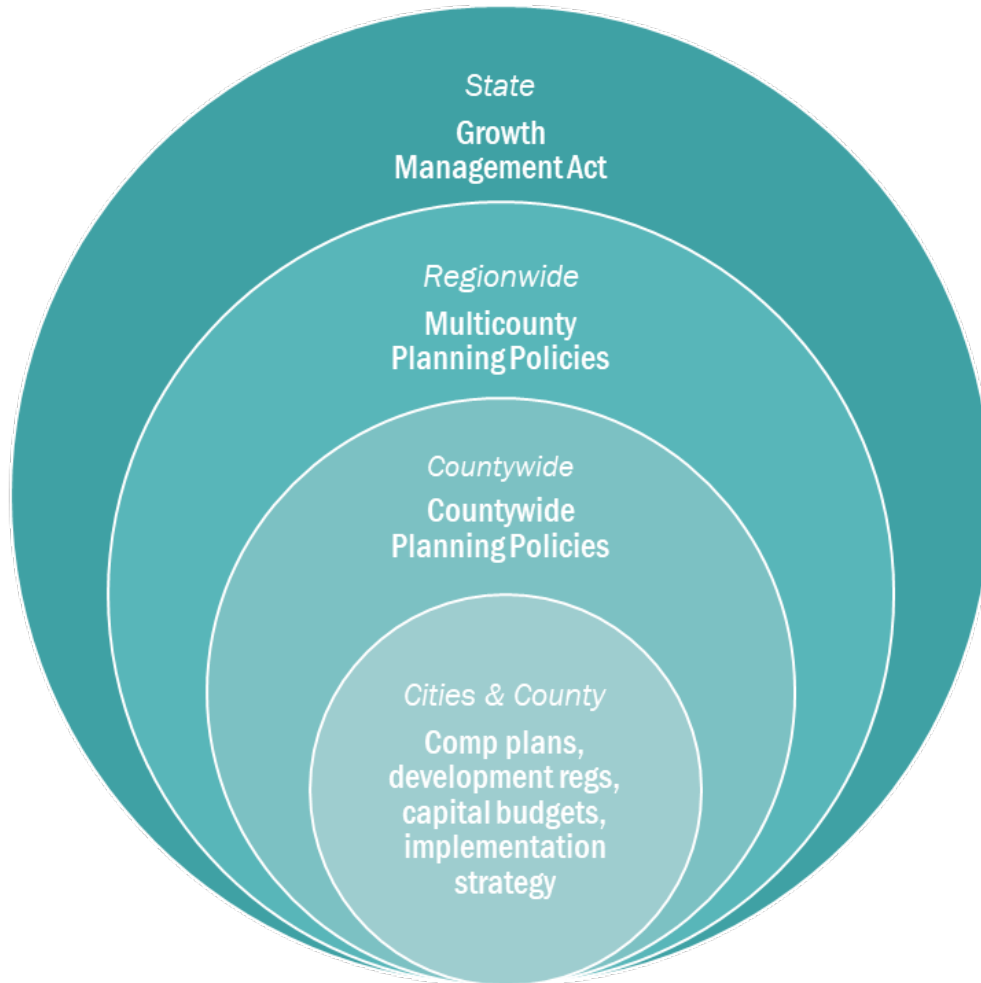
Jurisdictions can adopt policies that advance CPP Housing Chapter goals, but successful implementation may require resources and involvement from other levels of government, nonprofits, philanthropy, and the private sector.

At the same time, jurisdictions have direct control over many of the most important tools needed to meeting King County's housing needs. Policy and code changes can have a major impact on their own towards meeting a jurisdiction's housing needs. Policies that guide investments are also critical to ensuring the resources that are deployed are done so effectively. Taking into consideration each jurisdiction's unique needs and capabilities, the AHC will provide constructive feedback meant to improve local processes and approaches aimed at improving affordable housing outcomes.

Local jurisdictions are a critical partner for addressing the region's housing crisis. Together, local jurisdictions, the AHC, and other partners can remove barriers and implement new strategies to support affordable, accessible, and healthy housing choices for current and future residents across King County.

Planning Framework

In Washington State, jurisdictions use comprehensive plans to plan for and accommodate the housing needs of current and future residents. Multiple levels of government help guide the comprehensive planning process:



- The Washington State [Growth Management Act \(GMA\)](#) establishes a framework for comprehensive planning statewide (RCW 36.70A).¹
- The Puget Sound Regional Council's (PSRC) VISION 2050 sets [Multicounty Planning Policies \(MPPs\)](#) between King, Pierce, Snohomish, and Kitsap counties to align regional planning efforts.
- The [CPPs](#) guide local planning in King County. The CPPs are developed by the County and cities through the GMPC. The GMPC recommends the CPPs and subsequent amendments for approval by the King County Council. After King County Council approval and ratification, the CPPs or amendments must be ratified by jurisdictions representing at least 70 percent of King County's

¹ In 2021, House Bill 1220 significantly amended housing planning requirements under the GMA. The Washington Department of Commerce provides information on these new requirements on [their website](#).

population and 30 percent of the jurisdictions in King County within 90 days, as established by CPP Vision and Framework Chapter Policy FW-1.

King County and the 39 cities in King County must review and revise their **comprehensive plans** every ten years.² Under the GMA, a jurisdiction’s activity and capital budget decisions must be made in conformity with its comprehensive plan.³ Jurisdictions should also develop a strategy for implementing their comprehensive plan that describes the regulatory and nonregulatory measures to be used to implement the comprehensive plan and identify the development regulations needed.⁴

For the upcoming 2024-2044 planning period, jurisdictions in King County must adopt a periodic update to their comprehensive plan by December 31, 2024. **All King County jurisdictions should participate** in the AHC’s housing-focused comprehensive plan review program, as established by CPP H-26, which is intended to support jurisdictions in strengthening alignment of their comprehensive plans with the CPP Housing Chapter during the periodic update process.

² [RCW 36.70A.130](#)

³ [RCW 36.70A.120](#)

⁴ [WAC 365-196-650](#)

Comprehensive Plan Review Process

The AHC’s comprehensive plan review process starts with early collaboration between jurisdiction staff and AHC staff **before a jurisdiction releases a public review comprehensive plan draft**. It ends with jurisdictional adoption of comprehensive plans by or before December 31, 2024. The process has **four main stages**:



The following section provides guidance and outlines key jurisdictional tasks at each step.

I. Technical Assistance and Prepare for Plan Review

| Jurisdiction Key Tasks | AHC Key Tasks |
|--|--|
| <ul style="list-style-type: none"> Review AHC comprehensive plan review technical assistance resources Reach out to AHC staff for consultation and questions Inform AHC staff of the anticipated release date of the comprehensive plan public review draft Prepare submission materials | <ul style="list-style-type: none"> AHC staff available for technical assistance |

Jurisdiction staff are encouraged to explore the following resources for guidance on aligning comprehensive plans with the CPP Housing Chapter:

- [King County CPPs](#)
 - Housing Chapter, pages 37-51
 - Appendix 4: Housing Technical Appendix, pages 74-104
- [Resources for Documenting the Local History of Racially Exclusive and Discriminatory Land Use and Housing Practices](#) (for alignment with CPP H-5 and H-9)
- [Regional Affordable Housing Dashboard](#) – See the “Jurisdictional Snapshot” section of this dashboard for data on income-restricted housing in the jurisdiction, rates of cost burden broken out by racial and income categories, among other housing data

Jurisdiction staff should contact AHC staff at AHCplanreview@kingcounty.gov as early as possible to share anticipated release dates for comprehensive plan public review drafts. AHC staff are also available to meet and respond to questions about CPPs and the plan review process.

II. Submit Materials

| Jurisdiction Key Tasks | AHC Key Tasks |
|---|---|
| <ul style="list-style-type: none"> • Prior to or concurrent with release of the public review draft, submit: <ul style="list-style-type: none"> ○ housing-related components of the draft comprehensive plan; ○ draft land use map; ○ CPP completeness checklist; and ○ implementation strategies workbook • Meet with AHC staff for intake meeting • Work with AHC staff to set review schedule and date for AHC plan review | <ul style="list-style-type: none"> • AHC staff schedule intake meeting |

The AHC will review and comment on public review drafts to give jurisdictions and the AHC time to compile and respond to feedback in advance of jurisdictions submitting for PSRC and state agency reviews at least 60 days before scheduled adoption.

Materials for submission include:

- **Housing-related components of draft comprehensive plan**
Attach or link to a digital copy of the housing-related components of the public review draft of the plan, inclusive of all elements and relevant draft appendices and analysis. This includes the housing element and any other components central to demonstrating consistency with all the CPP Housing Chapter policies.

- **Draft land use map**
Attach or link to a digital copy of a map that reflects proposed land use changes. A pdf of the map is preferred.
- **CPP completeness checklist**
Fill out and attach a [completeness checklist](#) to guide and inform AHC staff review. Please submit this as a Word file.
- **Draft implementation strategies workbook**
Fill out and attach an [implementation strategies workbook](#) to demonstrate consistency with CPP Housing Chapter policies that state “implement” or “adopt.” Please submit this as an Excel file.

Jurisdiction staff can email materials to AHC staff at AHCplanreview@kingcounty.gov. Upon submission, AHC staff will confirm the receipt of materials.

Following receipt, AHC staff will schedule an intake meeting with jurisdiction staff. Jurisdiction staff should be prepared to highlight plan components AHC staff should pay particular attention to in their review.

III. AHC Review and Comment Letter Approval and Issuance

| Jurisdiction Key Tasks | AHC Key Tasks |
|--|---|
| <ul style="list-style-type: none"> • Meet with AHC staff after their initial review to answer clarifying questions and provide additional context • Review preliminary draft comment letter for factual errors | <ul style="list-style-type: none"> • AHC staff conduct initial review • AHC staff meet with jurisdiction staff after initial review • AHC staff draft comment letter • AHC Chair shares preliminary draft comment letter with jurisdiction staff • AHC approves comment letter |

The AHC’s review takes **two to five months** from submission to AHC issuance of a plan review comment letter.

During the review process, AHC staff use **housing-focused comprehensive plan review standards** to evaluate plans’ alignment with the CPPs and inform comment letters. For guidance on how to align with comprehensive plan review standards, see the [Aligning with Comprehensive Plan Review Standards](#) section of this guidance.

Before AHC staff draft comment letters, AHC staff will meet with jurisdiction staff twice: at initial intake and then again to discuss any initial concerns or confusion with the plan.

AHC staff will then complete their review and draft a comment letter.

Plan review comment letters:

- Confirm the completeness of housing-related components of draft comprehensive plans (see [plan review standards 1 and 2](#));
- Provide an assessment of draft plan meaningfulness and how plan elements advance CPP Housing Chapter goals (see [plan review standard 3](#)); and
- Highlight particularly meaningful components, recommend changes necessary to align with the CPP Housing Chapter, and suggest changes to strengthen alignment with the CPP Housing Chapter.

Then, the AHC Chair will review the letter and share a preliminary version with jurisdiction staff, requesting the jurisdiction staff review the letter for factual errors. The Chair will determine which comments are pulled for discussion by the AHC and which should be placed on the consent agenda.

Following this, AHC staff will circulate and post online the draft letters, the consent agenda, and plan review submission materials to the AHC at least four business days before an AHC meeting. At the meeting, AHC members may pull additional comments for discussion. Following AHC deliberation, members may possibly amend and approve the comment letter.

IV. Incorporate AHC Feedback and Adopt Plan

| Jurisdiction Key Tasks | AHC Key Tasks |
|---|---|
| <ul style="list-style-type: none"> • Once the AHC approves and issues the letter, jurisdiction staff review the letter and address feedback provided • Jurisdiction legislative body adopts the comprehensive plan prior to or by the state-mandated December 31, 2024 deadline • After comprehensive plan adoption, jurisdiction staff update and submit to AHC staff revised implementation strategies workbook to align with the adopted comprehensive plan | <ul style="list-style-type: none"> • AHC Chair emails final comment letter to jurisdiction • AHC staff post the final comment letter on AHC website |

Following AHC approval of the letter, the AHC Chair will email the final comment letter to the jurisdiction staff who submitted the plan and AHC staff will post the letters online. AHC staff will endeavor to review public review drafts and submissions in a timely fashion. The AHC comment letter will acknowledge if the letter is delayed or approved with no time for the jurisdiction to incorporate feedback.

Jurisdiction staff are then encouraged to review the AHC’s comments and work with their city councils, planning commissions, or other collaborators to revise their draft comprehensive plans to align with the recommendations and suggestions. Jurisdictional councils should adopt the comprehensive plan by the state-mandated December 31, 2024 deadline.

The AHC's review is the first step in an accountability framework for the housing-related components of local comprehensive plans established in the CPPs:

- H-27 establishes annual monitoring and reporting requirements for the County and local jurisdictions;
- H-28 directs the County to provide information on jurisdictions' progress using public-facing tools; and
- H-29 directs the GMPC or its designee to review monitoring and reporting data and identify significant shortfalls.

The [2021 CPPs](#), as amended in 2023 by King County Ordinance 19660, include the complete policies and additional information in the Housing Technical Appendix (Appendix 4).

Note that AHC staff will use the implementation strategies submitted during the plan review process to track jurisdictional progress on implementing an adopted comprehensive plan over the course of the planning period. If plan policies or implementation strategies change after submitting to this program, jurisdiction staff should send updated implementation strategies to AHC staff to reflect the changes after the plan is adopted. This step will ensure that the AHC provides an evaluation of jurisdictional progress based on finalized implementation strategies and plan policies. AHC staff will work with the jurisdiction through the monitoring and reporting and mid-point review processes as established by CPPs H-27 and H-29 to understand any progress to update the plan or implement policies to align with the AHC's comment letter.

Aligning with Comprehensive Plan Review Standards

This section provides details about the comprehensive plan review standards and how AHC staff will evaluate jurisdictions' submissions using these standards. These standards were approved by [GMPC Motion 23-2](#).

Standard 1 | Plan Completeness

STANDARD 1

The plan policies and related appendices evidently address all CPP Housing Chapter policies.

The housing-related components of a public review draft comprehensive plan submitted for the AHC's review should be consistent with all CPP Housing Chapter policies.

To facilitate the AHC's review, jurisdiction staff should complete and submit a [CPP Completeness Checklist](#) with their draft plan, which can be found in the appendix of this guidance. In the checklist, staff should list the comprehensive plan policy or appendices that address each CPP Housing Chapter policy and provide page numbers to guide AHC staff as they review the plan. Jurisdiction staff completing the checklist can submit additional information for reviewers to consider in the "notes" column of the checklist. This could include explanations of how the final plan will address unfinished plan elements and/or unaddressed CPPs Housing Chapter policies.

See the [2021 King County CPPs](#), as amended in 2023 by King County Ordinance 19660, for the full text of the CPP Housing Chapter.

Standard 2 | Implementation Strategies

STANDARD 2

The plan or related appendices articulate implementation strategies for Housing Chapter CPPs requiring policy adoption and/or implementation: H-1, H-2, H-9, H-10, H-12, H-13, H-14, H-15, H-16, H-17, H-18, H-19, H-20, H-21, H-22, H-23, H-24, and H-25. Implementation strategies should identify:

- a) the regulatory or non-regulatory measures to be used to implement goals and policies used to address CPP Housing Chapter policies; and
- b) an adoption schedule for measures.

As part of plan review submittal, jurisdiction staff should:

- provide the AHC with implementation strategies for CPP Housing Chapter policies H-1, H-2, H-9, H-10, H-12, H-13, H-14, H-15, H-16, H-17, H-18, H-19, H-20, H-21, H-22, H-23, H-24, and H-25, all of which require jurisdictions adopt and/or implement specific policies to accommodate housing needs and advance CPP Housing Chapter goals.
- articulate regulatory and non-regulatory measures necessary to implement the comprehensive plan policy.

- include a timeline of anticipated adoption.⁵ For timelines, jurisdiction staff can indicate the anticipated year of adoption or use ranges (e.g., “short-term”), as long as the ranges are defined (e.g., “short-term” means one to three years).

To facilitate review, jurisdiction staff should include a completed [Implementation Strategies Workbook](#) in their submission materials. Implementation measures provided in this workbook should be concise and action-oriented. If needed, jurisdictions may accompany implementation strategies with notes for AHC reviewer consideration.

The workbook includes example implementation strategies. Additional examples of potential measures to implement policies responsive to CPP Housing Chapter policies can be found in [Table H-3 in the CPP Appendix 4: Housing Technical Appendix](#) and in the Resource section in this guide.

The AHC will use the implementation strategies to evaluate jurisdictional progress on comprehensive plan implementation. The AHC will develop and finalize specifics on how implementation progress will be reported after reviewing the information collected during the first year the AHC collects data for annual monitoring. For updates on this process, refer to AHC staff reports on annual monitoring and comparative standard development on the AHC’s [“Meetings and Membership” page](#).

Jurisdiction staff should **provide updated implementation strategies** to AHC staff within three months of plan adoption for use in annual monitoring. Please email updated strategies to AHCplanreview@kingcounty.gov.

Standard 3 | Meaningful Plan Responses to CPP Housing Chapter

STANDARD 3

The plan lays out meaningful policies that, taken together, support the jurisdiction’s ability to equitably meet housing need by promoting:

- a. equitable processes and outcomes;
- b. increased housing supply, particularly for households with the greatest needs;
- c. expanded housing options and increased affordability accessible to transit and employment;
- d. expanded housing and neighborhood choice for all residents;
- e. housing stability, healthy homes, and healthy communities; and
- f. a commitment to continuous improvement through implementation, monitoring, and adjustment.

Once the AHC reviews a plan for completeness and accompanying implementation strategies, reviewers will evaluate the meaningfulness of plan responses to CPP Housing Chapter policies. Per CPP H-26, meaningful plan responses to CPP Housing Chapter policies can be reasonably expected to achieve a material, positive change in the jurisdiction’s ability to meet housing needs over the planning period.

AHC staff created a framework (Table 1) to help jurisdiction staff understand and articulate how their plan meaningfully supports the jurisdiction’s ability to equitably meet housing needs. Use of this tool is optional.

⁵ [WAC 365-196-650](#)

Qualities for meaningful plan responses to the CPP Housing Chapter include, but are not limited to:

Allocated countywide housing needs guide land use changes and other strategies

Policy H-1 allocates the jurisdiction’s share of countywide housing need, broken out into 0 to 30 percent, 31 to 50 percent, 51 to 80 percent, 81 to 120 percent, and greater than 120 percent area median income (AMI) bands and emergency housing needs. After conducting a land capacity analysis, as outlined by the Department of Commerce,⁶ jurisdiction staff should use allocated countywide housing needs as the basis for land use changes proposed in the comprehensive plan. Likewise, programmatic commitments outlined in a jurisdiction’s plan should be reasonably expected to support the jurisdiction’s ability to meet needs over the planning period.

Strong analysis of needs, gaps, and barriers that inform policies and implementation strategies

CPPs H-3, H-4, and H-5 require jurisdictions conduct analysis meant to inform the comprehensive plan update process. Jurisdictions should refer to CPP Appendix 4 and [the resource section](#) of this guidance for best practices in completing required CPP Housing Chapter analyses.

The AHC will be more likely to consider a submission meaningful if it clearly demonstrates:

- how policies are informed by the housing needs, gaps, and barriers identified and
- how the implementation strategies are likely to have a meaningful impact on the jurisdiction’s ability to implement its policies.

Committed and action-oriented language in policies and implementation strategies

To convey plan meaningfulness, policy and implementation strategies language should avoid ambiguous words that do not demonstrate a clear commitment to implementation or positive, material change. For example:

- Use the word “shall” when committing to future actions (City X *shall* pass policy/measure A) where possible. “Shall” demonstrates a stronger commitment to a stated action in a legal context than other intention-setting words such as “should.”
- Avoid words like “consider” or “encourage,” unless followed by a concrete action or commitment. Neither word demonstrates a strong or clear commitment to action.

Strong and consistent equity focus

The CPP Housing Chapter sets an overarching goal that all jurisdictions “take actions that eliminate race-, place-, ability, and income-based housing disparities.” Meaningful plan responses to CPP Housing Chapter policies should result in policies and implementation strategies to meet housing needs in a manner that focuses on households with the greatest needs. For guidance on crafting equitable housing plans, see CPP Appendix 4 and [the resources section](#) of this guide.

Policies work together, not against each other

Before submitting plans for review, jurisdiction staff should ensure that plan policies do not advance some CPP Housing Chapter goals at the expense of others. For example, upzoning in an area at high risk of displacement to accommodate designated housing needs would likely undermine policies related to displacement if the upzones weren’t adopted with complementary anti-displacement

⁶ Washington State Department of Commerce, [“Guidance for Updating Your Housing Element”](#) Chapter 3: Land capacity analysis, page 16.

measures. During review, the AHC would highlight this contradiction and suggest ways to alleviate displacement risk while also accommodating new housing growth.

Demonstrated intention for material, positive change

Comprehensive plans should demonstrate a clear commitment to improving how a jurisdiction plans for and accommodates housing need over the planning period. Given ongoing housing disparities, the AHC recognizes that current planning in King County is insufficient to meet the level of need. Meaningful plans will recognize gaps in the jurisdiction's current approach to meeting housing needs and propose policies that demonstrate a clear intention to achieving material, positive change.

Table 1: Example Framework to Evaluate Meaningful Responses

This table provides a logic framework a jurisdiction could use to understand how their housing-related analysis, policies, and implementation strategies meaningfully support their ability to equitably meet housing needs. Jurisdictions are **not required** to use or submit this framework to the AHC for review.

| Need, Gap or Barrier Identified | Comprehensive Plan Policy | Implementation Strategies | Expected Positive, Material Change |
|--|--|--|---|
| <p><i>Example:</i></p> <p>Madrone City’s Housing Needs Assessment finds its existing density incentive program has only been used a few times, resulting in few new income-restricted housing units.</p> | <p><i>Example:</i></p> <p>Policy: Madrone City shall provide density bonuses and other incentives for the development of affordable housing. Bonuses shall be periodically reviewed and updated, as needed, to ensure they are effective in creating affordable housing units</p> | <p><i>Example:</i></p> <p>Ongoing measure: Madrone City staff will prepare code changes to improve the existing density incentive program with the 2024 Comprehensive Plan. The update will require some income-restricted units in projects in commercial areas and in areas with transit options for commuters to access major employment centers.</p> | <p><i>Example:</i></p> <p>Madrone City identifying and addressing a gap in its existing density incentive program will improve the city’s ability to provide options desirable to developers, addressing CPP H-12: “Adopt and implement policies that improve the effectiveness of existing housing policies and strategies and address gaps in partnerships...”</p> <p>The mandatory component of Madrone City’s inclusionary housing program meaningfully addresses CPPs H-15: “Increase housing choices...”; H-16: “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</p> |

| Need, Gap or Barrier Identified | Comprehensive Plan Policy | Implementation Strategies | Expected Positive, Material Change |
|--|--|--|--|
| | | | <p>H-18: “Adopt inclusive planning tools and policies whose purpose is to increase the ability of all residents in jurisdictions throughout the county”</p> |
| <p><i>Example:</i></p> <p>Madrone City’s Housing Needs Assessment finds and residents shared that renters are significantly more likely to be cost burdened and face unique barriers in maintaining stable, affordable, accessible, and healthy housing.</p> | <p><i>Example:</i></p> <p>Policy: Cooperate with A Regional Coalition for Housing, King County, the King County Housing Authority, and social and health service agencies to further housing stability for renters by:</p> <ul style="list-style-type: none"> • advocating for state-level eviction reforms and tenant protections; • adopting and maintaining equitable tenant protections; • tracking landlord and property manager compliance with fair housing laws and provide technical assistance to landlords and property managers; • providing tenant rights education in multiple languages; and • exploring other tools and opportunities to increase housing stability for renters. | <p><i>Example:</i></p> <p>New measure: Madrone City staff will provide public communications supporting implementation of comprehensive plan policies in multiple languages and accommodate interpretation needs.</p> <p>New measure: Madrone City will provide funding for greater fair housing education and enforcement efforts, in coordination with other cities in the region, to track compliance with fair housing laws and provide technical assistance and education to landlords and property managers of local residential properties.</p> <p>New Measure: Madrone City staff will explore potential new tenant protection policies through a literature and policy review and community engagement.</p> | <p><i>Example:</i></p> <p>Working with regional partners will improve Madrone City staff’s knowledge and capacity to support affordable housing, meaningfully addressing CPP H-7: “Work cooperatively with PSRC, subregions, and other entities”</p> <p>Funding fair housing education and enforcement, in coordination with other cities, will increase Madrone City staff understanding and capacity to address fair housing issues. Additionally, reducing language and other barriers for renters to access resources and defend their rights will increase housing stability for limited English proficiency and other low-income households, meaningfully addressing CPPs H-22: “Implement, promote, and enforce fair housing policies and practices so that every person in</p> |

| Need, Gap or Barrier Identified | Comprehensive Plan Policy | Implementation Strategies | Expected Positive, Material Change |
|--|--|--|--|
| | | | the county has equitable access and opportunity to thrive in their communities of choice, regardless of their... membership in any... category of protected people” and H-23: “Policies that protect housing stability for renter households “ |
| <p><i>Example:</i></p> <p>Madrone City’s Housing Needs Assessment identifies a gap in Madrone City’s code that makes it challenging or confusing for staff to understand how to permit emergency and permanent supportive housing.</p> | <p><i>Example:</i></p> <p>Policy: Madrone City shall encourage development of permanent supportive, emergency, and other affordable housing.</p> | <p><i>Example:</i></p> <p>New measure: Madrone City staff will prepare code changes to reduce barriers and provide clarity for permitting permanent supportive and emergency housing with the 2024 Comprehensive Plan.</p> | <p><i>Example:</i></p> <p>Madrone City’s proposed code changes will create clarity for permitting staff and facilitate development of permanent supportive and emergency housing, addressing, allowing it to accommodate the needs allocated in CPP H-1.</p> |
| <p><i>Example:</i></p> <p>Madrone City’s equity-focused community work group and local residents shared concerns about ongoing displacement of residents in Black, Indigenous, and People of Color (BIPOC) communities who have lived in the area for generations.</p> | <p><i>Example:</i></p> <p>Policy: Madrone City shall take actions to prevent and mitigate residential and cultural displacement for communities at risk of displacement to address racially disparate outcomes in housing and help protect cultural communities for Black, Indigenous, and People of Color by supporting cultural</p> | <p><i>Example:</i></p> <p>Ongoing measure: Implement the recommendations of the Madrone City Anti-displacement Strategies Report, including:</p> <ul style="list-style-type: none"> - inclusionary housing - community preference program - preserving manufactured housing communities | <p><i>Example:</i></p> <p>The combination of the community preference and inclusionary housing programs will provide Madrone City a tool to directly mitigate displacement, addressing CPPs H-9: “Adopt intentional, targeted actions that repair harms to Black, Indigenous, and People of Color...” and</p> |

| Need, Gap or Barrier Identified | Comprehensive Plan Policy | Implementation Strategies | Expected Positive, Material Change |
|--|--|---|--|
| <p>Madrone City’s documentation of the local history of racially exclusive and discriminatory land use and housing practices finds that its predominantly single-family zoning has a discriminatory effect by excluding lower-income households, which are more likely to be BIPOC, from areas of opportunity.</p> | <p>institutions, community hubs, and using community preference programs for affordable housing that helps people with a connection to the local community remain in or return to their community of choice.</p> | <ul style="list-style-type: none"> - supporting community land trusts and other equitable development efforts <p>Ongoing measure: Madrone City is providing land at no cost and financial and technical assistance to community-based organizations for the development of affordable housing and community space.</p> | <p>H-21: “Adopt policies and strategies that promote equitable development and mitigate displacement risk, with consideration given to the preservation of historical and cultural communities...”</p> <p>Investing in and supporting cultural facilities mitigates cultural displacement, also addressing CPP H-21.</p> |

Common Gaps in Reviewed Draft Comprehensive Plans

AHC staff appreciate the jurisdictions who are among the first to submit their draft plans to the program in 2024. This program is still relatively new and evolving and review of these plans helped AHC staff understand how jurisdictions are seeking to address their housing needs while aligning with the recent changes at the state, regional, and county levels. What we learn and share from these plans may also benefit jurisdictions still preparing their submissions to the AHC.

AHC staff also recognize the substantial amount of time and effort that went into each jurisdiction's draft plans, which overall are proposing significant changes.

At a high level, most of the gaps AHC staff are seeing are the areas where the CPPs are unique or go beyond the state and multicounty planning requirements. AHC staff encourage jurisdictions to closely review the [CPP Housing Chapter](#) (begins on page 37) as they develop their comprehensive plans and evaluate them for key differences from the state GMA and PSRC's VISION 2050.

The following section organizes themes in gaps by the relevant CPP Housing Chapter policies observed to date. AHC staff may identify additional themes after reviewing additional draft plans.

CPP H-2 | Prioritize housing needs of 0 to 30 percent AMI households

AHC staff identified policies and implementation strategies that would benefit or serve extremely low-income households across jurisdictions' submissions in the first five plans reviewed. However, AHC staff did not consistently find policies or strategies that explicitly *prioritize* 0 to 30 percent AMI households, which is required by CPP H-2, but not by the GMA or VISION 2050.

The CPP Housing Technical Appendix states that the countywide need is the greatest for households at or below 30 percent AMI (extremely low-income). It will take significant cross-sector and cross-jurisdictional collaboration and resources to effectively and equitably meet the needs of these households. Jurisdictions are encouraged to explore emerging best practices to effectively meet the needs of extremely low-income households, including but not limited to:

- mitigating environmental concerns for compromised properties with proposed permanent supportive housing (PSH) projects;
- prioritizing vacant lands for PSH over other uses;
- making surplus publicly-owned lands suitable for 0 to 30 percent AMI housing development available for long-term lease or purchase at a reduced cost for extremely low-income housing;
- creating a unique dwelling type for PSH coupled with cost reduction strategies for this housing type;
- reducing fees, taxes, permit and hookup fees for PSH projects;
- streamlining design and permit review for PSH projects;
- increasing buildable height and/or floor area ratio for PSH; and
- reducing or removing cost requirements such as vehicular parking requirements for PSH.

As part of its Passport to 2044 workshop series, PSRC held a webinar on removing barriers to deeply affordable housing which provides additional guidance to jurisdictions on this topic. You can access the webinar [here](#).

CPPs H-3 and H-4 | Perform an inventory and analysis

The AHC has reviewed strong housing inventories and analyses, but some plans have not included data points or whole analyses required by CPPs H-3 and H-4. CPP H-3 includes a long list of specific datapoints and analysis, not all of which are required by the GMA or VISION 2050. While AHC staff have seen substantive evaluations in alignment with CPP H-4, H-4 requests information beyond GMA or VISION 2050 requirements regarding partners and policies to meet need and eliminating racial and other disparities in access to housing and neighborhoods of choice. For example, H-3(g) requires jurisdictions report age by race/ethnicity and disability, and H-3(i) requires jurisdictions include the housing development capacity within a half-mile walkshed of high-capacity or frequent transit service, if applicable.

Some jurisdictions provided supplemental documents to the AHC as a response to the data required by CPP H-3 and H-4. That analysis should be included as part of the adopted comprehensive plan. Including it in an appendix and summarizing findings in the housing element is sufficient. For further guidance on CPPs H-3 and H-4, see the [CPP Housing Technical Appendix \(pp. 82-84\)](#).

CPPs H-5 and H-9 | Document and repair harm to BIPOC households from past and current land use and housing policies and practices

The AHC has reviewed strong racially disparate impact analyses, but racially disparate impact analyses conducted in response to state requirements do not completely satisfy the requirements of CPPs H-5 and H-9. While the GMA requires jurisdictions identify local policies and regulations that result in disparate impacts, displacement, and exclusion in housing (RCW 36.70A.070 (2)(e)(i-iii)), CPPs H-5 and H-9 require jurisdictions:

***H-5** Document the local history of racially exclusive and discriminatory land use and housing practices, consistent with local and regional fair housing reports and other resources. 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. Demonstrate how current strategies are addressing impacts of those racially exclusive and discriminatory policies and practices. The County will support jurisdictions in identifying and compiling resources to support this analysis.*

***H-9** 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 (generally identified through Policy H-5). Promote equitable outcomes in partnership with communities most impacted.*

Examples of suitable data to align with CPP H-5 include, but are not limited to:

- homeownership rates by race/ethnicity and age;
- concentration or dispersion of affordable housing or housing choice voucher usage within the jurisdiction;
- affordability of housing in the jurisdiction to the median income household of different races and ethnicities;
- racial demographics by neighborhood, e.g., degrees of integration and segregation;
- access to areas of opportunity by race and ethnicity;
- demographics of residents in areas of high displacement risk; and

- results of fair housing testing performed or fair housing complaint data within a jurisdiction.

Jurisdictions must also identify local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing, including but not limited to:

- zoning that may have a discriminatory effect;
- disinvestment; and
- infrastructure availability.

Racially restrictive housing covenants, unrecognized treaties with tribes, current exclusionary zoning, and lack of investment in affordable housing are examples of discriminatory practices or policies a jurisdiction could include in an assessment. Jurisdictions should not limit their review to local policies and regulations. The region should share resources and work together to develop a shared understanding of how racist or discriminatory housing practices and disparities were perpetuated by all levels of government as well as the private sector. While each jurisdiction's assessment will be unique, King County jurisdictions are encouraged to identify federal, state, and regional practices as well as local.

Finally, a jurisdiction must demonstrate how current strategies are addressing impacts of those racially exclusive and discriminatory policies and practices. Using this information, jurisdictions should identify and implement policies and regulations to address and begin to undo racially disparate impacts, displacement, and exclusion in housing caused by local policies, plans, and actions consistent with the policies in the "Implement Policies and Strategies to Equitably Meet Housing Needs" section of the CPP Housing Chapter.

Jurisdictions are encouraged to refer to the [2019 King County Analysis of Impediments to Fair Housing Choice](#) to understand current barriers to fair housing choice. In addition to the guidance offered in this technical appendix, the County has identified and compiled [resources](#) to support this analysis. For further guidance on this analysis, refer to [guidance](#) on conducting a racially disparate impact analysis from the Department of Commerce.

A suggested approach to identifying reparative strategies to align with CPP H-9 includes:

- Looking at how current policies are working to undo past racially exclusive and discriminatory land use and housing practices or where they might be perpetuating that history
- When current policies are perpetuating the harm, implementing equitable countermeasures to remove those policies and their impacts and mitigate disparate impacts on housing choice, access, and affordability
- Using PSRC's Regional Equity Strategy and associated tools and resources to center equity in comprehensive planning processes and intended outcomes

Specific policies and strategies include:

- Reduce or eliminate exclusionary zoning
- Implement anti-displacement strategies, which include addressing housing stability for low-income renters and owners as well as preserving cultural diversity of the community
- Implement policies that increase affordable homeownership opportunities for BIPOC communities
- Distribute affordable housing throughout a jurisdiction, with a focus on areas of opportunity
- Consider environmental health of neighborhoods where affordable housing exists or is planned and plan for environmentally healthy neighborhoods
- Support and prioritize projects that promote access to opportunity, anti-displacement, and wealth-building opportunities for BIPOC communities

Strategies for promoting equitable outcomes in partnership with communities most impacted include:

- Utilize an equity impact review tool when developing or implementing policies or strategies
- Create and utilize a community engagement toolkit
- Intentionally include and solicit engagement from members of communities of color or low-income households in policy decision-making and committees

CPP H-18 | Provide access to affordable housing throughout the jurisdiction, with a focus on areas of high opportunity

AHC staff have drafted recommendations related to CPP H-18 for most jurisdictions' comment letters so far. While VISION 2050 requires plans to reduce disparities in access to opportunity through inclusive planning and targeted investments, the CPPs provide further specificity on methods of increasing housing choice, addressing current disparities in access to opportunity, and meeting the needs of current and future residents.

The differences between the VISION 2050 and CPP Housing Chapter requirements mean AHC staff will take a closer look at the geographic distribution of housing types within a jurisdiction, particularly as it relates to increasing housing choices for households with incomes at 0 to 30, 30 to 50, and 50 to 80 percent of AMI in areas with higher access to opportunity. Concentration of multifamily development capacity or placing multifamily development capacity in areas of lower opportunity may result in a comment from the AHC.

Specifically, H-18 requires jurisdictions:

***H-18** Adopt inclusive planning tools and policies whose purpose is to increase the ability of all residents in jurisdictions throughout the county to live in the neighborhood of their choice, reduce disparities in access to opportunity areas, and meet the needs of the region's current and future residents by:*

- a) Providing access to affordable housing to rent and own **throughout** [emphasis added] the jurisdiction, with a focus on areas of high opportunity;*
- b) Expanding capacity for moderate-density housing throughout the jurisdiction, especially in areas currently zoned for lower density single-family detached housing in the Urban Growth Area, and capacity for high-density housing, where appropriate, consistent with the Regional Growth Strategy;*
- c) Evaluating the feasibility of, and implementing, where appropriate, inclusionary and incentive zoning to provide affordable housing; and*
- d) Providing access to housing types that serve a range of household sizes, types, and incomes, including 2+ bedroom homes for families with children and/or adult roommates and accessory dwelling units, efficiency studios, and/or congregate residences for single adults.*

How a jurisdiction aligns with CPP H-18 is informed by many factors that depend on the context of each jurisdiction. Other inclusive planning tools and policies that increase neighborhood choice include:

- Plan for moderate- or high-density housing and complete neighborhoods within a half-mile walkshed of high-capacity or frequent transit service in areas already zoned for residential housing and where exposure to air pollution and particulate matter is low to moderate

- Plan for complete neighborhoods around existing and planned essential services throughout a jurisdiction
- Establish a designation that allows more housing types within single-family zoned areas near parks, schools, and other services
- Housing types to allow development that is compatible in scale with existing housing
- Revise parking regulations to prioritize housing and public space for people over space to park cars
- Allow the conversion of existing houses into multiple units
- Allow additional units on corner lots, lots along alleys and arterials, and lots on zone edges
- Incentivize the retention of existing houses by making development standards more flexible when additional units are added
- Provide technical and design resources for landowners and communities to redevelop and maintain ownership
- Reduce or remove minimum lot size requirements
- Create incentives for building more than one unit on larger than average lots
- Limit the size of new single-unit structures, especially on larger than average lots
- Retain and increase family-sized and family-friendly housing
- Remove the occupancy limit for unrelated persons in single-family zones, if applicable

Frequently Asked Questions

This section addresses frequently asked questions about the King County [CPP Housing Chapter](#). More information on the CPP Housing Chapter can be found on the AHC [website](#).

Growth Targets, Housing Needs, and Sufficient Planning and Accommodation

1. What are growth targets and housing needs?

In the [CPPs](#), growth targets are the total housing units and jobs a jurisdiction should plan for over a 20-year period to manage projected population and economic growth. Growth targets serve as the basis for the land use assumptions used in jurisdictions' comprehensive plans, e.g., for transportation modeling or capital facility planning (see CPP DP-14a).

Housing needs are the amount of permanent housing and emergency housing a jurisdiction needs over a 20-year period to meet the projected population's housing needs and alleviate cost burden.

- *Permanent housing needs* include the amount of additional housing units needed for households making 0 to 30 percent, 30 to 50 percent, 50 to 80 percent, 80 to 100 percent, 100 to 120 percent, and above 120 percent of AMI as well as permanent supportive housing needs (a portion of the total 0 to 30 percent AMI housing needs).
- *Emergency housing needs* include the amount of emergency housing and shelter beds needed.

Jurisdictions are required to plan for and accommodate housing needs in their comprehensive plans (see question 3 for a description of sufficient plans and accommodations of housing needs).

Growth targets are listed in the CPP Development Patterns Chapter in Table DP-1. Housing needs are listed in the CPP Housing Chapter in CPP H-1.

2. How were my jurisdiction's housing needs determined?

A jurisdiction's housing needs were derived from countywide permanent and emergency housing needs supplied by the Washington State Department of Commerce.⁷ The CPPs distribute permanent and emergency housing needs to jurisdictions using two different methods.

For permanent housing needs, each jurisdiction's growth target was initially divided into shares of need at each income level equal to the overall countywide shares of need at each income level. The method then increased the portion of the share dedicated to housing affordable at 80 percent AMI households and below in jurisdictions with:

- fewer 0 to 80 percent AMI housing options;
- fewer income-restricted housing options; and
- a greater imbalance of low-wage workers to low-wage jobs.

⁷ For more information on the method used to calculate countywide permanent and emergency housing needs, see "Establishing Housing Targets for your Community" from the Department of Commerce, starting on p. 28 [\[link\]](#)

Under this method, the total permanent countywide need was equivalent to the countywide current growth target of 308,677 units and housing growth targets by jurisdictions were the same as total permanent housing needs.

A jurisdiction's emergency housing needs were determined by dividing the total countywide emergency housing needs by a jurisdiction's percent share of planned countywide housing growth.

See CPPs Appendix 4: Housing Technical Appendix for a description of the methods used to determine a jurisdiction's housing needs.

3. Do housing needs include all housing or just housing for households making less than the area median income?

The CPPs establish housing needs for all economic segments of the population, including but not limited to households making at or below 100 percent of AMI.

4. Are emergency housing needs included in the growth targets?

No. Emergency housing needs are reported separately from permanent housing needs. A jurisdiction must plan for and accommodate both their emergency housing and permanent housing needs. Note that total permanent housing needs are equal to housing growth targets and do not include emergency housing needs. Emergency housing forms are generally temporary group living situations or non-permanent residences, so they do not count as permanent housing units or towards growth targets.

5. What are “sufficient planning and accommodations” of housing needs?

Sufficient planning and accommodations are defined in CPP H-1:

H-1 Plan for and accommodate the jurisdiction's 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. Sufficient planning and accommodations are those that comply with the Growth Management Act requirements for housing elements in Revised Code of Washington 36.70A.020 and 36.70A.070,⁸ that outline regulatory and nonregulatory measures to implement the comprehensive plan (Washington Administrative Code 365-196-650), and that comply with policies articulated in this chapter. Projected countywide and jurisdictional net new housing needed to reach projected future need for the planning period is shown in Table H-1.⁹

While jurisdictions can choose strategies to meet these planning for and accommodation requirements, all jurisdictions must demonstrate sufficient zoned capacity for their allocated housing needs.

⁸ For details on GMA requirements of housing elements, see the Expanded Housing Element Checklist from the Department of Commerce and other guidance on planning for housing on their Updating GMA Housing Elements webpage. [\[link\]](#)

⁹ Refer to Table H-2 in CPP Appendix 4 for countywide and jurisdictional future housing needed in 2044 and baseline housing supply in 2019.

6. Can I plan for more housing capacity than my growth target?

Jurisdictions may allow development capacity that exceeds their adopted housing growth targets. Market and other factors limit the likelihood that a specific parcel is developed, and not every parcel will be developed to the maximum allowed density.

For certification review, PSRC provides additional guidance on how to demonstrate consistency with VISION 2050 in their [Planning for Housing Needs and Growth Targets](#) guidance.

Jurisdictions should also avoid increasing development capacity in a pattern inconsistent with the Regional Growth Strategy, per CPP DP-14c.

7. Should planning for infrastructure and services reflect the growth targets or housing needs?

The growth assumptions used across all elements of a comprehensive plan, including the transportation and capital facilities elements, need to be internally consistent and substantially consistent with adopted growth targets.

The infrastructure needs, like those in a capital improvement plan, should be informed by the types of development expected over the next 20 years, and this might be affected by the housing need allocation. For example, if accommodating housing need means adding significant capacity for multifamily housing in a jurisdiction where currently none exists, the plan should reflect the infrastructure needs of a future with a more diverse housing mix, including infrastructure improvements needed to serve anticipated growth (e.g., wider circumference water mains; additional stormwater infrastructure).¹⁰

Jurisdictions typically do not create plans for infrastructure needed to accommodate total zoned capacity. They do make plans for the infrastructure to accommodate the growth projected in the planning period.

8. What if we don't have funding for the 0 to 30 percent AMI housing need, but that is most of our jurisdiction's housing need by income?

Jurisdictions need to plan for and accommodate projected permanent and emergency housing needs per CPP H-1 (see question 3 for a description of sufficient planning and accommodation of housing needs). Jurisdictions should demonstrate that they have the sufficient zoned capacity for the types of housing assumed to be affordable to the lowest income households.¹¹ Jurisdictions should also describe the funding contributions and regional collaboration, along with additional strategies used to remove barriers to, stimulate, and prioritize development or preservation of housing affordable to 0 to 30 percent AMI households (see CPP H-2). Jurisdictions should also highlight any identified funding gaps for 0 to 30 percent AMI housing needs (see CPP H-4).

¹⁰ See [WAC 365-196-420](#)

¹¹ For guidance on completing a land capacity analysis in your comprehensive plan, see "Guidance for Updating your Housing Element" from the Department of Commerce, starting on p. 16. [\[link\]](#)

9. Why are jurisdictions required to provide sufficient capacity for affordable housing when there are inadequate subsidies to build and operate them as affordable?

Jurisdictional efforts to align with the CPP Housing Chapter policies include establishing the readiness conditions for affordable housing to be built in the future. Despite known limits to funding, jurisdictions must demonstrate in their comprehensive plan that there is sufficient land capacity for housing needs and strategies to address known barriers to housing development consistent with housing needs. Plans should identify gaps in dedicated resources for meeting housing needs (see CPP H-4).

10. What is the role of ADUs in providing capacity for 0 to 80 percent AMI households?

AHC staff have reviewed draft plans that propose allowing for accessory dwelling units (ADUs) in traditionally single-family areas as a strategy to increase access to neighborhoods of choice for low-income households. AHC staff appreciate the inclusion of ADUs as a method of increasing housing diversity and options within traditionally single-family areas. However, AHC staff do not consider ADUs a meaningful strategy to address housing needs below 80 percent of AMI in King County markets, which are some of the most expensive in the State of Washington. Instead, jurisdictions should count ADUs as capacity for households above 80 percent of AMI.¹²

This said, if jurisdictional staff intend to count ADUs as capacity for low-income housing needs and/or to employ ADUs as a strategy to provide “affordable housing to rent/own throughout the jurisdiction,” staff should provide a market analysis or significant precedent of ADU housing costs in the jurisdiction within the housing element or technical appendix. Jurisdictions may also set reasonable expectations that ADUs will cater to lower income groups by proposing subsidies or development incentives that may offset ADU rental and/or construction costs.

Housing-focused Comprehensive Plan Review

11. What is the King County Affordable Housing Committee’s housing-focused comprehensive plan review program?

The AHC is implementing a housing-focused draft comprehensive plan review program (plan review program), as established by the CPP Housing Chapter Policy H-26. The purpose of the program is to:

- offer early guidance and assistance to jurisdictions on comprehensive plan alignment with the CPP Housing Chapter;
- ensure plans address all Housing Chapter goals and policies and include required analyses;
- evaluate the meaningfulness of public review draft comprehensive plan responses to Housing Chapter policies, where meaningful responses can be reasonably expected to achieve a material, positive change in the jurisdiction’s ability to meet housing needs; and
- collect data on jurisdictional implementation details to inform future AHC and GMPC monitoring and evaluation during the remainder of the planning period.

At a high level, the program operates as follows:

¹² AHC staff assumptions for typical ADU costs in King County communities align with Exhibit 13 in the Department of Commerce’s Guidance for Updating Your Housing Element, pp.33. [\[link\]](#)

- AHC staff are available to provide technical assistance as jurisdictions draft their comprehensive plans and materials for AHC review.
- Jurisdictions submit the housing-related components of their draft comprehensive plan, a draft land use map, a [CPP completeness checklist](#), and an [implementation strategies workbook](#) to AHC staff for initial review.
- Jurisdictions will receive a comment letter from the AHC on how their draft plan aligns with the CPP Housing Chapter that may include recommendations or suggestions to improve alignment.

Jurisdictions will incorporate feedback and adopt their plan.

12. What is the timeline for the AHC’s review of my comprehensive plan?

The AHC review is expected to take between two to five months from the date of submission of plan review materials to the AHC’s issuance of a comment letter. The AHC recognizes jurisdictions in King County are working to comply with many new requirements for this comprehensive planning period. Jurisdictions may face challenges submitting public review draft plans to the AHC early enough to receive and incorporate feedback. The AHC may not send a jurisdiction a comment letter with enough time for the jurisdiction to address the AHC’s recommendations before the state-mandated deadline of December 31, 2024. AHC staff are committed to working collaboratively with jurisdiction staff and providing flexibility whenever feasible. Given this timeline, AHC staff are willing to consider reviewing a pre-public review draft if the jurisdiction wants more time to address AHC comments before adoption. Jurisdictions interested in exploring this option should email AHC staff at AHCplanreview@kingcounty.gov.

13. For your review, in addition to the policies related to housing, do you need background reports, appendices, housing action plans, or proposed code amendments that would support those policies as implementation steps (or do you not need code proposals)?

You may submit background reports and appendices to demonstrate alignment with the CPP Housing Chapter. However, the required inventory and analysis should be in the adopted plan (including appendices). The AHC is not reviewing code amendments. Jurisdictions have submitted code changes as implementation strategies to complete after adoption of the plan. AHC staff believe this approach is appropriate, depending on the policy being implemented.

14. How are you reviewing cities with revised growth targets?

Your plan should be internally consistent (growth assumptions should be consistent throughout the plan) so housing need should comport with the amount of growth assumed by the plan. King County regional planning staff are coordinating with AHC staff as the GMPC considers a potential reconciliation process, to ensure that GMPC’s recommendation considers the allocated housing needs.

15. In our jurisdictional need allocations, PSH and emergency housing are specifically identified, but emergency shelter and transitional housing are not. Where should those housing types be captured in our monitoring and reporting? Does that include tent encampments? Do tent encampments count as emergency housing?

Emergency shelter is classified as meeting emergency housing need. Transitional housing is classified as permanent housing, separate from emergency housing or permanent supportive housing needs. AHC staff recommend reviewing [Commerce guidance](#) on how housing types are organized into the different housing needs.

Annual Monitoring and Reporting

16. How will the AHC monitor and report on jurisdictional progress to plan for and accommodate housing needs?

Starting in 2025, the AHC will monitor jurisdictional progress to plan for and accommodate housing needs. CPP H-27 outlines data the AHC will use to conduct annual monitoring. CPP H-28 outlines the AHC’s monitoring and reporting process. The AHC will develop a monitoring and reporting strategy in 2024 and 2025. Check the AHC’s [website](#) for updates.

17. What does it mean to “credit” jurisdictions for the contributions they make to a subregional collaboration, mentioned in CPP H-28?

The word “credit” used in policy H-28 means to report on funding and other contributions made by jurisdictions to support the preservation or creation of income-restricted units through subregional collaborations, e.g., A Regional Coalition for Housing (ARCH) and South King Housing and Homelessness Partners (SKHHP).

The AHC will determine how to collect and report this data sometime in 2024 or 2025. AHC staff will develop this reporting structure in close consultation with ARCH and SKHHP staff, jurisdictional planners, and human services staff from around the county. Ultimately, the AHC—which includes representatives from Seattle, King County, Sound Cities Association, and nonprofit and business leaders—will approve the reporting strategy.

The AHC will likely report, at a minimum, the total dollar amount of capital funding a jurisdiction contributed to ARCH or SKHHP in the prior calendar year to help accelerate the development or preservation of affordable homes in King County. The AHC will include other data points based on interest and feasibility, but could include data such as:

- data that puts funding contributions in the context of the number of people that live in a jurisdiction or size of that jurisdiction’s budget;
- the estimated total number of income-restricted units that could be built with that contribution, based on the average cost per unit;¹³

¹³ Note that the amount of revenue some jurisdictions collect for affordable housing is relatively small—enough to fund a fraction of a unit.

- details about the project that was awarded the funds, such as unit count by AMI, location, whether it's a rental or ownership project, etc.; and
- the amount of funding the jurisdiction provided to support ARCH and SKHHP operations.

18. Can I decrease the number of housing needs my jurisdiction must plan for and accommodate by contributing funds to subregional entities?

No. Jurisdictions cannot use contributions to subregional entities to decrease the housing needs that they must plan for and accommodate (see CPP H-1 in question 5 for a definition of sufficient plans and accommodations). This said, a jurisdiction is not expected to fully meet its allocated housing needs by 2044 on its own, which the [CPP Housing Chapter introduction](#) addresses:

Local jurisdictions can create enabling environments and generate local revenue to support new housing development and housing preservation, but successful implementation requires resources and involvement from other levels of government, nonprofits, and the private sector.

Housing unit production is one, but not the only means to measure whether a jurisdiction has planned for and accommodated housing needs. Success will primarily be defined by whether a jurisdiction has adopted and implemented policies and plans that, taken together and in light of available resources, can be reasonably expected to support and enable the production or preservation of units needed at each affordability level. Policies in this chapter do not require that jurisdictions act outside of current powers or assume full responsibility for the construction of units required to meet housing needs articulated in policy H-1.

19. Are contributions to subregional collaborative capital funds encouraged?

Yes. The CPP Housing Chapter strongly encourages interjurisdictional collaboration and pooling of resources across the county.

Subregional collaborations for affordable housing, such as SKHHP and ARCH, accelerate the availability and flexibility of gap financing for affordable homes through their capital contributions from their member jurisdictions. Jurisdictional contributions to these subregional collaborations would be considered an appropriate accommodation in response to CPP H-12, which states:

CPP H-12: 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.

In addition, the CPP Housing Chapter encourages subregional contributions in the “Collaborate Regionally” section:

Collaborate Regionally

Housing affordability is important to regional economic vitality and sustainability. Housing markets do not respect jurisdictional boundaries. For these reasons, this section promotes cross-sectoral and interjurisdictional coordination and collaboration to identify and meet the housing needs of households with extremely low-, very low-, and low-incomes. Collaborative efforts, supported by the work of the Affordable

Housing Committee, the Puget Sound Regional Council and other bodies, contribute to producing and preserving affordable housing and coordinating equitable, sustainable development in the county and region. Where individual jurisdictions lack sufficient resources, collective efforts to fund or provide technical assistance for affordable housing development and preservation, and for the creation of strategies and programs, can help to meet the housing needs identified in comprehensive plans. Jurisdictions with similar housing characteristics tend to be clustered geographically. Therefore, there are opportunities for efficiencies and greater impact through interjurisdictional cooperation. Such efforts are encouraged and can be a way to meet a jurisdiction's share of the countywide affordable housing need.

H-6 Collaborate with diverse partners (e.g., employers, financial institutions, philanthropic, faith, and community-based organizations) on provision of resources (e.g., funding, surplus property) and programs to meet countywide housing need.

H-7 Work cooperatively with the Puget Sound Regional Council, 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 this chapter.

Five-Year Check in

20. What is the five-year, or midcycle, check in?

The five year—or mid-planning cycle—check in is an opportunity for jurisdictions to adjust their strategies five years after the adoption of comprehensive plans and in response to analysis and findings by the GMPC or its designee. This process is described in CPP H-29:

H-29 Five years after adoption of a periodic update to a comprehensive plan, the Growth Management Planning Council or its designee will review monitoring and reporting data collected through annual reporting and other local data and analysis. The Growth Management Planning Council will identify significant shortfalls in planning for and accommodating housing needs, provide findings that describe the nature of the shortfalls, and make recommendations that jurisdictions take action to address shortfalls. Jurisdictions with significant shortfalls shall identify and implement actions to address the shortfalls, such as amending the comprehensive plan, land use regulations, or other legislative or administrative actions. Implementation of this policy shall be coordinated with the requirement in Revised Code of Washington 36.70A.130(9)(c) to produce and take actions pursuant to a five-year implementation progress report.

For the 2024-2044 planning period, the five-year check in is expected to occur in approximately 2029 and the GMPC most likely will designate the AHC to perform the analysis and develop initial findings. The AHC will finalize the details of the check in procedures no earlier than 2025. For updates, be sure to monitor the AHC's [website](#).

Note that the process outlined by CPP H-29 will be coordinated with but not the same as the statewide 5-year implementation progress report required by RCW 36.70A.130(9).

21. What will be the process to identify shortfalls during the five-year check in?

When identifying shortfalls in planning for and accommodating housing needs during the five-year check in, the GMPC or designee will consider results from annual data monitoring and reporting and other local data and analysis. AHC staff envision the GMPC or designee will focus on a jurisdiction's progress to implement strategies (submitted during the plan review process) to plan for and accommodate housing needs and advance CPP Housing Chapter policies. Alongside data on implementation, the GMPC or its designee will also likely consider data on the outcome of strategies adopted by jurisdictions to fulfill their requirements under the CPPs, e.g., data on the production of income-restricted units affordable to households at varying levels of AMI or rates of cost burden for low-income households. The AHC will finalize the details of the check in procedures no earlier than 2025. For updates, be sure to monitor the AHC's [website](#).

Resources

Consultations

- To schedule a preparation meeting with AHC staff, email AHCplanreview@kingcounty.gov

Support to Align with CPP Housing Chapter

- [2021 King County CPPs](#), including:
 - Housing Chapter
 - Appendix 4: Housing Technical Appendix
- [Resources for Documenting the Local History of Racially Exclusive and Discriminatory Land Use and Housing Practices](#)
- [Regional Affordable Housing Dashboard](#). See the “Jurisdictional Snapshot” section of this dashboard for data on income-restricted housing in each jurisdiction, rates of housing cost burden broken out by racial and income categories, among other housing data.

Housing Planning Resources

Puget Sound Regional Council Resources

- [VISION 2050 Planning Resources Housing Element Guide](#) – a resource for developing effective comprehensive plan housing elements that address housing choice and affordability
- [Regional Housing Strategy](#) - a “playbook” of regional and local actions to preserve, improve, and expand housing stock in the region
- [Housing Innovations Program](#) – tools and strategies to promote more housing options and affordability locally
- [Housing Incentives and Tools Survey](#) – a report summarizing the findings of a 2022 survey of local jurisdictions to learn how regulatory incentives and tools are used
- [Housing Opportunities by Place](#) – typology used to classify strategies and tools that effectively address housing access and affordability
- [Housing Affordability in the Central Puget Sound Region](#) – infographic exploring factors that impact housing affordability and the impacts of rising housing costs on households
- [Racial Residential Segregation](#) – resource explores residential settlement patterns across the region by race and explores causes of racial residential segregation
- [Displacement risk mapping tool](#) and [interactive report](#) identifies areas where residents and businesses are at greater risk of displacement

Washington State Department of Commerce Resources

- [Guidance for Updating your Housing Element \(Book 2\), including Appendix B: Adequate provisions checklists \(Word\)](#) – guidance for jurisdictions in updating their comprehensive plans and regulations with the new statewide housing requirements

- [Guidance to Address Racially Disparate Impacts](#) (Book 3) – guidance on how to integrate new racially disparate impacts requirements into housing element updates
- [Washington State Department of Commerce Housing Planning Guidance](#) – guidance on planning for housing under the GMA, including the new requirements established by 2021 House Bill 1220
- [Planning for Housing](#) – information on Commerce grants, guidance, and links to other housing pages

Other Housing Planning Resources

- [Municipal Research and Services Center](#) – MSRC offers a wide range of services to local government, including resources for housing planning
- [Local Housing Solutions Housing Needs Assessment](#) – data tool created in partnership with PolicyLink and managed by the New York University Furman Center’s Housing Solutions Lab that provides customized jurisdictional reports on housing needs, market conditions, demographics, and more
- [Planning for Equity Policy Guide](#) – American Planning Association guide on crafting policies that undo inequitable planning policies

Community Engagement Resources

- [King County Community Engagement Guide](#) - King County community engagement guide to assist jurisdiction staff with designing community engagement processes broadly
- [Community Engagement Resource Library](#) - Racial Equity Tools resource library of strategies to make sure that all voices are heard as part of inclusive decision making
- [Equitable Engagement for Comprehensive Plans](#) - PSRC guide for conducting equitable community engagement during comprehensive plans update

Other Comprehensive Plan Review Process Resources

- [Washington State Department of Commerce Plan Review](#) – provides guidance on how to submit plans to the Department of Commerce for state review
- [Puget Sound Regional Council Plan Review Manual](#) – provides guidance and consistency tools for aligning plans and policies with VISION 2050 and requirements in state law