

Memo

To: King County Affordable Housing Committee Members
From: McCaela Daffern, Regional Affordable Housing Implementation Manager
cc: Housing Interjurisdictional Team
Date: December 6, 2022
re: Affordable Housing Committee's Final Recommendations in Response to Growth Management Planning Council Motion 21-1

Purpose of the December 9 AHC Meeting

At the December 9 Affordable Housing Committee (AHC or Committee) meeting, members will review a recommended response to 2021 Growth Management Planning Council (GMPC) Motion 21-1 and potentially approve the components of this response for GMPC consideration.

Components under consideration by the AHC include:

- **Table 1: November 3, 2022 Proposed Amendments to the Countywide Planning Policies** Proposed recommended amendments to the King County Countywide Planning Policies (CPPs) necessary to implement AHC recommendations in response to GMPC Motion 21-1.
- **Table 2: Technical Amendments to the November 3 Proposed Amendments to the Countywide Planning Policies** Technical amendments to proposed CPP amendments (in [Table 1](#)) developed by AHC staff for Committee consideration.
- **Table 3: Substantive Amendments to the November 3 Proposed Amendments to the Countywide Planning Policies** Substantive amendments to proposed CPP amendments (in [Table 1](#)) proposed by AHC members or developed by AHC staff in response to Committee feedback and HIJT and IJT input on the proposed CPP amendments.
- **Exhibit 1: Accountability Framework Process** Details about how the accountability framework articulated in the recommended CPP amendments (Tables [1](#), [2](#) and [3](#)) would work.
- **Exhibit 2: Housing-focused Comprehensive Plan Review Standards** for use by the AHC in a proposed comprehensive plan review program described in the accountability framework (Exhibit 1) and implemented via the proposed CPP amendments (Tables [1](#), [2](#), and [3](#)).

Background

On June 23, 2021, the GMPC adopted recommended amendments to the King County CPPs, including amendments to align the CPP Housing Chapter with recent changes to the state's Growth Management Act, Puget Sound Regional Council's VISION 2050, and the Regional Affordable Housing Task Force's Final Report and Recommendations, while centering equitable outcomes in the policy amendments. Through GMPC Motion 21-1, ratified by King County Council in Ordinance 19384¹, the AHC was directed to commence a collaborative effort to:

¹ King County Council Ordinance 19384 [\[link\]](#)

1. Monitor and report jurisdictional housing supply, housing affordability, housing needs, and income-restricted housing levels, including disparities between subregions and comparisons to established housing goals and targets, through the Regional Affordable Housing Dashboard and reporting.
2. Establish subregional or jurisdictional affordable housing needs, informed by local data and the data and methodology provided by the Department of Commerce (Commerce).
3. Recommend to the GMPC an accountability and implementation framework for equitably meeting affordable housing needs across the region. The AHC will consider, at a minimum, the range of Development Patterns and Housing Chapter amendments proposed by GMPC members in June 2021 regarding understanding and accommodating housing need, holding jurisdictions accountable, and allocating resources.
4. Recommend to the GMPC any CPP amendments necessary to implement their recommendations.

The GMPC directed the AHC to complete its housing needs work by the end of 2022 and report back to the GMPC quarterly on its progress.

AHC Response to GMPC Motion 21-1

Throughout late 2021 and all of 2022, the Committee and AHC staff engaged in a collaborative process with multiple stakeholders to respond to GMPC Motion 21-1. Stakeholder groups engaged included:

- GMPC
- Housing Interjurisdictional Team (HIJT)
- Community Partners Table
- Interjurisdictional Team (IJT)
- King County Planning Directors
- King County Regional Homelessness Authority (KCRHA)
- Commerce

The sections below summarize the collaborative work informing the AHC's recommendations for addressing each aspect of GMPC Motion 21-1.

1. Monitoring and Reporting Requirements

Proposed CPP amendments 16 and 17 in [Table 1](#) describe enhanced monitoring and reporting requirements, including the monitoring of progress towards planning for and accommodating jurisdictional housing needs and an annual process for reporting housing data. Because more time and broad collaboration with stakeholders is needed, proposed CPP amendment 18 directs the Committee to establish standardized benchmarks, housing data trends, and comparative standards to aid in assessing local progress relative to countywide trends and other jurisdictions.

2. Jurisdictional Housing Needs Allocation Method

In 2022, under direction from 2021 GMPC Motion 21-1 and in response to House Bill 1220,² the AHC evaluated methodological options for allocating countywide housing needs to jurisdictions in

² Engrossed Second Substitute House Bill 1220 was passed by the Washington State Legislature in 2021 [[link](#)].

King County, informed by local data and the data and methodology provided by Commerce. Commerce classifies countywide need into two need categories in their projections:

- Permanent housing needs: includes by income level and permanent supportive housing needs. Income levels include 0-30, 31-50, 51-80, 80-100, 100-120, and above 120 percent of area median income (AMI). Permanent supportive housing needs are expressed as a subset of the 0-30 percent AMI category.
- Emergency housing needs: includes emergency housing and emergency shelters.

At the November 3 AHC meeting, Committee members voted to select a recommended method of allocating permanent housing needs. Committee members were also briefed on progress to establish emergency countywide housing needs supplied by Commerce to jurisdictions in King County.³

Permanent Housing Needs

Option 3, the AHC's recommended method, allocates countywide permanent housing needs based on expected growth in the jurisdiction (established by a jurisdiction's growth target) and adjusts the allocation of affordable housing (housing affordable to households making below 80 percent of AMI) by three factors that increase housing choice in places with fewer affordable housing options, fewer income-restricted housing options, and a greater imbalance of low-wage workers to low-wage jobs.

The AHC's selection of a preferred method to allocate countywide permanent housing needs came after nearly six months of deliberation by the Committee and eight months of AHC staff engagement with stakeholders. In deliberations on November 3, many Committee members voiced support for Option 3 due to its focus on equitably distributing housing needs to places where affordable housing is currently limited and to support the Community Partners Table. The Committee's vote to select Option 3 as the preferred method was unanimous.

A detailed description of the recommended allocation Option 3 can be found starting on page 3 of the September 29 Jurisdictional Housing Needs AHC Staff Report.⁴ Recommended jurisdictional permanent housing needs based on the AHC's recommended allocation method can be found in Table H-1 in the substantive amendments table ([Table 3](#)) and Table H-2 in the technical amendments table ([Table 2](#)). Note that these allocations are based on draft countywide need projections from Commerce and are subject to change upon Commerce's release of final projections in 2023.

Emergency Housing Needs

At the November 3 AHC meeting, Committee members considered draft emergency countywide housing need projections from the Department of Commerce, released on October 12.

AHC staff also briefed Committee members on their collaboration with the King County Regional Homelessness Authority (KCRHA) on a method of distributing emergency housing and shelter needs to KCRHA-defined subregions and from those subregions to jurisdictions. In the case that KCRHA work to establish needs was not complete by the December 9 meeting, staff briefed the AHC on

³ See the October 28, 2022 "GMPC Motion 21-1 Jurisdictional Housing Needs and Selection of Jurisdictional by Income Level Housing Need Option" AHC Staff Report for November 3 AHC briefing material [\[link\]](#)

⁴ See the October 28, 2022 "Selection of Jurisdictional by Income Level Housing Need Option" staff report [\[link\]](#)

results of a “contingency” allocation approach that allocates countywide emergency housing needs to jurisdictions based on their percent share of planned subregional growth. Staff also committed to reach out to Commerce to understand the method of projecting countywide emergency housing and shelter needs and develop a method for jurisdictional allocations, informed by KCRHA’s work if available, by the December 9 AHC meeting.

On November 21, KCRHA informed AHC staff that emergency housing subregional projections will not be available in time for AHC deliberations. KCRHA recommended moving forward with the AHC-reviewed contingency plan, which allocates emergency housing need in proportion to the jurisdiction’s percent share of planned housing growth countywide. This means the draft emergency jurisdictional housing needs shown in Tables H-1 and H-2 in the November 3 proposed CPP amendments remain unchanged since the last AHC meeting. These needs can be found in Table H-1 in the substantive amendments table ([Table 3](#)) and Table H-2 in the technical amendments table ([Table 2](#)). Note that these allocations are based on draft countywide need projections from Commerce and are subject to change upon Commerce’s release of final projections in 2023.

Status of Countywide Need Projections

The AHC will base their jurisdictional permanent and emergency housing needs recommendation on draft countywide projections from Commerce released on October 12, 2022. These figures are subject to change following adoption of the Committee’s recommendation. Commerce anticipates releasing final housing need projections in February 2023. Staff will update Tables H-1 and H-2 with Commerce’s final projection using the allocation methods approved by the Committee and report said changes to the GMPC. AHC staff recommend the AHC direct staff to update Tables H-1 and H-2 upon release of this final data from Commerce and report those changes to the GMPC. At this time, the total countywide need projection will remain the same, but the percent of permanent countywide need allocated to each AMI band is expected to shift as is the final countywide emergency housing need projection and allocation of this need to jurisdictions.

3. Accountability Framework

On May 18, 2022, the AHC approved a preliminary accountability framework for meeting affordable housing needs across the region. This framework included:

1. **Review Plans:** AHC would offer early guidance and assistance to jurisdictions on comprehensive plan alignment with the CPP Housing Chapter. Before adoption of a periodic update to a comprehensive plan, the AHC would review plans for alignment with the CPP Housing Chapter and provide comments.
2. **Monitor and Report:** AHC would annually measure jurisdictional progress to plan for and accommodate housing needs in dashboard using standardized benchmarks, housing data trends, and comparative standards.
3. **Require Adjustments:** GMPC would review monitoring and reporting data five years after plan adoption, identify jurisdictions with significant shortfalls in planning for and accommodating affordable housing targets, and require those jurisdictions to take reasonable measures to adjust plans or land use maps to address significant shortfalls. AHC recommends and GMPC approves a CPP amendment that defines a collaborative process that will occur no sooner than 2024 to establish GMPC authority to assess progress and issue determinations of adequacy five years after a comprehensive plan is adopted and require reasonable measures be taken to address inadequacies if significant shortfalls in planning for and accommodating affordable housing targets are identified.

Following the November 3 AHC meeting, AHC member Bellevue Mayor Lynne Robinson proposed an amendment to a new policy in the November 3, 2022 proposed CPP amendments (CPP H-29) which would establish GMPC authority to require adjustments in line with the accountability framework the Committee approved on May 18, 2022 (see [Table 1](#) for the November 3 proposed CPP amendment language). In response, AHC staff, in collaboration with the HIJT, developed new language for H-29 that removed a requirement to adjust plans and instead directed the GMPC to make recommendations to adjust plans in the case that they identified significant shortfalls in planning for and accommodating housing needs. Jurisdictions with significant shortfalls in planning for and accommodating housing needs would then identify and implement actions to address shortfalls. To remain consistent with these changes, the third element of the accountability framework now reads:

3. Mid-Cycle Check-in and Adjustment: Five years after comprehensive plan adoption, the GMPC reviews the information collected through annual monitoring and reporting. Based on this analysis, the GMPC identifies jurisdictions with significant shortfalls in planning for and accommodating housing needs, provides findings that describe the nature of shortfalls, and may make recommendations that jurisdictions take action to address them. Jurisdictions with significant shortfalls in planning for and accommodating need then identify and implement actions to address the shortfalls.

Sound Cities Association caucus chair, Kirkland Councilmember Amy Falcone is the sponsor of this amendment.

Proposed policy H-29 and rationale for revisions are detailed in [Table 3](#) of this report. Process details of the accountability framework can be found in Exhibit 1.

Housing-Focused Comprehensive Plan Review Standards

Since the approval of the accountability framework in May, AHC staff, in consultation with the IJT and HIJT, developed a set of housing-focused comprehensive plan review standards and a process by which the standards would be used. Staff presented draft comprehensive plan review standards along with details about the plan review process at the November 3 AHC meeting. Committee members affirmed the direction of the both the comprehensive plan review standards and process.

A detailed description of the comprehensive plan review standards can be found in the October 28, 2022 Draft Comprehensive Plan Review Standards and Certification Pilot AHC staff report.⁵ An articulation of the comprehensive plan review process can be found in Exhibit 1. Exact language for standards can be found in Exhibit 2. The standards and process descriptions remain unchanged since the November 3 AHC meeting.

Comprehensive Plan Certification Pilot

Between August and October 2022, the AHC sought volunteers for a plan certification pilot, in which certain King County jurisdictions would volunteer to participate in a housing-focused comprehensive plan certification process, similar to that conducted by the Puget Sound Regional Council. Comprehensive plan certification would occur after plan adoption and be limited to the housing-related elements of a comprehensive plan. The plan review standards would serve as the standards for certification. Under this pilot, the AHC would issue recommendations for certification to the GMPC

⁵ See October 28, 2022 “King County Affordable Housing Committee Housing-Focused Comprehensive Plan Review Standards and Plan Certification Pilot” AHC staff report [[link](#)].

and the GMPC would issue the decision. The pilot would provide the AHC and GMPC with key information on whether a certification process leads to more effective housing planning and policy and whether such a process should be integral to the CPP accountability framework.

To ensure sufficient pilot participation, staff recommended the AHC confirm a cohort of approximately five pilot cities before the AHC's final vote on an accountability framework. Jurisdictions with varying levels of staff capacity and those representing different subregions in the county were encouraged to join to help inform a program that can be scaled up or down depending on jurisdictional capacity and tailored to the range of housing needs in different subregions. Snoqualmie, Redmond, and Kirkland expressed interest by the October 31, 2022 deadline.

Given the lack of interest, the AHC decided not to recommend a pilot in the near term but expressed interest in the GMPC reconsidering the efficacy of this concept before the next periodic comprehensive plan update.

4. Necessary CPP Amendments

GMPC Motion 21-1 directed the AHC to consider, at a minimum, the range of Development Patterns and Housing Chapter amendments proposed by GMPC members in June 2021 regarding understanding and accommodating housing need, holding jurisdictions accountable, and allocating resources. In September 2022, the AHC approved staff's proposed responses to amendments proposed by GMPC members in 2021. Reference the September 29, 2022 GMPC Member Amendments Response AHC Staff Report for more detail.⁶

Following decisions made about jurisdictional housing needs and the accountability framework, AHC staff drafted CPP amendments, which the AHC reviewed on November 3.⁷ Amendments spanned the CPPs Development Patterns Chapter, Housing Chapter, the Housing Chapter Technical Appendix, and the Glossary. A complete set of the November 3 underlying proposed CPP amendments can be found in [Table 1](#).

Further Amendments to the November 3 Proposed CPP Amendments

During the November 3 AHC meeting, AHC staff briefed the AHC on the range of potential amendments. Committee members had an opportunity to provide feedback and were briefed on a process to submit proposed amendments.⁸

Technical Amendments

AHC staff identified four technical CPP amendments:

1. **Revised Permanent Jurisdictional Housing Needs:** After the AHC November 3 meeting, AHC staff identified rounding errors in jurisdictional housing need allocations, which resulted in the allocations of some jurisdictions being slightly more or fewer total units than their

⁶ See the September 23, 2022 "Draft Recommended Response to 2021 GMPC Member Amendments" AHC staff report [\[link\]](#).

⁷ See the October 28, 2022 "Draft GMPC Motion 21-1 Countywide Planning Policy Amendments" AHC staff report [\[link\]](#).

⁸ Staff identified several minor administrative CPP amendments (e.g., grammatical error corrections). These minor amendments are not displayed in this report or in accompanying tables, but will be transmitted to the GMPC with AHC's final recommendation statement.

adopted housing growth target. Staff updated the housing needs dashboard and Tables H-1 (see [Table 3](#)) and H-2 (see [Table 2](#)) in the CPP amendments to correct for these errors.

2. *Elimination of Housing Need Assessment Requirement for Housing Size by Race and Ethnicity*: Due to delays in the release of 2020 decennial census data, household size by race and ethnicity at the appropriate geographic level will not be available to jurisdictions in time to inform comprehensive plans. While household size by race and ethnicity data is available in the 2010 census, AHC staff recommend eliminating the requirement for the housing inventory, rather than recommending jurisdictions rely on outdated figures to inform plans.
3. *Revised Definition of “Housing Needs” in Glossary*: Glossary language was changed to be more consistent with the Growth Management Act and Commerce’s methodology to project countywide housing needs.
4. *Definition of “Net New Housing Needs” in Glossary*: Commerce uses the term “net new housing needs” in their calculations to describe all additional units needed, on top of baseline housing units, to meet total countywide need during the planning period. Tables H-1 and H-2 (see [Tables 2](#) and [3](#)) also make use of this terminology. To clarify the term, AHC staff added a definition of “net new housing needs” to the CPP Glossary.

Technical changes to November 3 proposed CPP amendments can be found in [Table 2](#).

Substantive Amendments

Substantive changes to CPP amendments since November 3 in response to Committee feedback are summarized below:

1. *Planning for and Accommodating Housing Needs*: During a discussion of proposed amendments at the November 3 AHC meeting, Committee members instructed AHC staff to collaborate with the HIJT to propose CPP amendments that describe what successful planning and accommodations of countywide housing need look like. In response, AHC staff, in consultation with the HIJT and IJT, drafted new proposed amendments to the Housing Chapter introduction and CPP H-1 for AHC consideration on December 9:
 - Amendments to the Housing Chapter introduction clarify that successful plans and accommodations of housing need 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.
 - Amendments to the introduction also clarify that policies do not require jurisdictions to act outside of current powers or assume full responsibility for the construction of units required to meet housing needs.
 - Amendments to Policy H-1 cite the Revised Code of Washington, the Washington Administrative Code, and the CPPs to define “plan for and accommodate” as opposed to defining it before Commerce releases additional guidance on the matter. Proposed amendments to the proposed CPP Housing Chapter Introduction and policy H-1 can be found in [Table 3](#) (see amendments 4.1 and 5.1).
2. *Mid-cycle Check-in and Adjustment Period*: As described above, the HIJT amended Policy H-29 in response to a recommended amendment submitted by AHC Committee member Bellevue Mayor Lynne Robinson after the November 3 meeting. The submitted amendment sought to direct the GMPC to review annual monitoring and reporting data, identify jurisdictions with significant shortfalls in meeting and accommodating housing needs, and

make recommendations for, not require, those jurisdictions to actions to address identified shortfalls. Jurisdictions with significant shortfalls in planning for and accommodating housing needs would then identify and implement actions to address them. Further consideration by HIJT members led to a decision to exclude language referring to reasonable measures and instead to provide assurance that the GMPC will supply jurisdictions with findings on significant shortfalls in planning for and accommodating housing needs, without recommending specific actions that a jurisdiction should take to solve the problem.

In addition to these adjustments, AHC staff and HIJT members recommended excluding language in H-29 that directed the GMPC or its designee to develop new Housing Chapter CPP amendments establishing adequacy standards for jurisdictional efforts to plan for and accommodate housing needs and the implications for jurisdictions required to take reasonable measures no earlier than 2024. Instead, the HIJT recommends including a reference to future Committee work to outline the five-year check in and adjustment process in the transmittal of this recommendation to the GMPC.

Substantive changes to November 3 proposed CPP amendments can be found in [Table 3](#).

GMPC Briefing on AHC Response to GMPC Motion 21-1

On November 30, 2022, AHC staff briefed the GMPC on the AHC's response to Motion 21-1. Prior to the meeting, GMPC committee members from both the City of Mercer Island and the City of North Bend submitted letters for GMPC consideration.⁹ Both letters outlined concerns that the housing needs they would be allocated under Option 3 were unrealistic and difficult to achieve. In addition, the City of Mercer Island voiced support for the adoption of Option 1 and the City of North Bend supported Option 2 to allocate housing needs.

During the GMPC meeting, members engaged in a robust discussion of the AHC's response to GMPC Motion 21-1. Discussion touched on:

- **Jurisdictional Housing Needs and Jurisdictional Responsibilities to Plan for and Accommodate:** Building on concerns outlined in letters to the GMPC, GMPC members Mercer Island Mayor Salim Nice, North Bend Mayor Rob McFarland, Bellevue Deputy Mayor Jared Nieuwenhuis, and Kirkland City Councilmember Debra Srebnik voiced concerns over high allocations of affordable housing (housing affordable to households below 0-80% of AMI) and low allocations of market rate housing allocated to their jurisdictions under the AHC-recommended Option 3. Additionally, there were concerns around potential punitive measures for cities that do not see development of affordable housing in zones where capacity has been expanded to accommodate allocated housing needs. GMPC member, King County Council Chair, and AHC Chair Claudia Balducci explained the intent behind Option 3 to allocate housing needs to areas with fewer affordable housing options today and the process by which the AHC arrived at their recommendation of Option 3 on November 3. AHC staff also clarified that jurisdictions will not be responsible to build units sufficient to meet need, but to plan for and accommodate housing needs through land use changes, changes to development regulations, the provision of incentives, and other tools. AHC staff also noted

⁹ The City of Mercer Island's November 18, 2022 letter to the GMPC [\[link\]](#). The City of North Bend's November 29, 2022 letter to the GMPC [\[link\]](#)

that forthcoming guidance from the Department of Commerce would help clarify jurisdictional responsibilities.

- **Plan Certification Pilot:** Kirkland City Councilmember Kelli Curtis voiced disappointment in the AHC’s recommendation to not conduct the plan certification pilot, for which the City of Kirkland had volunteered to join. Both AHC staff and AHC Chair Claudia Balducci explained the reasoning behind the AHC decision (explained above).

Next Steps

The GMPC directed the AHC to complete its work to respond to GMPC Motion 21-1 by the end of 2022. The AHC meets on December 9 to potentially vote to approve recommended plan review standards and CPP amendments needed to establish recommended jurisdictional housing needs and an accountability framework for equitability meeting these needs. If approved, AHC staff or the AHC Chair will transmit the recommended components to the GMPC by December 31, 2022.

The AHC will consider future work needed to implement these recommendations at their first meeting in 2023, including items such as charter amendments.

Date	Item
Dec. 9, 2022	AHC approves recommended CPP amendments and other components needed to implement their recommendations.
Dec. 31, 2022	AHC Chair or staff transmit the AHC’s recommendations to the GMPC
Jan. 25, 2023	GMPC briefed on AHC’s recommended process improvements and CPP amendments
February 2023 (date unknown)	AHC staff will update housing needs tables H-1 and H-2 once Commerce releases final countywide housing need projections. Staff will report this change to the GMPC.
March 22, 2023	GMPC considers AHC recommendations on CPP amendments, accountability framework, and plan review standards. Briefed by AHC staff on final housing need projections.
May 2023	GMPC potentially approves AHC recommendations, including recommended CPP amendments to King County Council
Q4 2023	King County Council potentially adopts CPP amendments
Q1 2024	Cities and towns in King County potentially ratify CPP amendments

Exhibit 1: Accountability Framework Process

In response to item three of GMPC Motion 21-1, the Affordable Housing Committee recommends the following three-part accountability framework for equitably meeting affordable housing needs across King County. Each component refers to an accompanying CPP amendment in the CPP Housing Chapter (found in Table [1](#), [2](#), and [3](#)).

<i>Framework Component</i>	<i>Component Implementation Roles</i>
<p>1. Review Plans</p> <p>Before adoption of a periodic update to a comprehensive plan, the AHC reviews draft plans for alignment with the CPP Housing Chapter and comments.</p> <p>Occurs once every ten years, starting in late 2023</p> <p>Corresponding 2022 Proposed CPP Amendment (Table 1): 15, 26, 27</p>	<ul style="list-style-type: none"> a. County AHC staff work with PSRC and Commerce to identify opportunities to align guidance, review standards, and processes. b. AHC recommends in 2022 and GMPC establishes in 2023 plan review standards. In advance of ratification by King County cities, the AHC issues early jurisdictional guidance. Once ratified, the AHC invites jurisdictional staff to seek assistance. c. To provide jurisdictions with ample time to address feedback before plan adoption, jurisdictions should submit materials to AHC reviewers as early as possible, ideally before a public review draft is released, but no later than the time of release. d. AHC staff review draft housing-related provisions of a comprehensive plan and prepare comment letters for AHC review and issuance using comprehensive plan review standards and with guidance from AHC chair. Comments focus on areas of strength and additional work needed to align with CPP Housing Chapter before plan adoption. e. AHC reviews and issues comment letter on draft comprehensive plan before planned adoption.
<p>2. Monitor & Report</p> <p>After comprehensive plan adoption, AHC measures jurisdictional progress to plan for and accommodate affordable housing need in dashboard using standardized benchmarks, a comparative standard, and housing data trends.</p> <p>Occurs annually, starting in 2024</p> <p>Corresponding CPP Amendments: 16, 17, 18, 26, 27, 28</p>	<ul style="list-style-type: none"> a. AHC recommends to the GMPC a CPP amendment that revises the housing data trends and performance benchmarks that will be tracked annually across all jurisdictions or subregions and directs the County to compare jurisdictional progress. b. AHC staff work with PSRC to align jurisdictional housing data collection efforts. c. AHC staff or consultant monitors jurisdictional progress to reach countywide or subregional benchmarks every year in the dashboard, in consultation with IJT/HIJT. d. The annual dashboard update includes annual jurisdictional comparisons against the countywide or subregional benchmarks set and progress relative to other jurisdictions. Jurisdictional comparison format will be approved by the AHC no earlier than 2023. e. In response to monitoring, AHC periodically issues reports or

	<p>recommendations on how to reach targets more effectively.</p>
<p>3. Mid-Cycle Check-in and Adjustment Five years after comprehensive plan adoption, the GMPC reviews the information collected through annual monitoring and reporting. Based on this analysis, the GMPC identifies jurisdictions with significant shortfalls in planning for and accommodating housing needs, provides findings that describe the nature of shortfalls, and may make recommendations that jurisdictions take action to address them. Jurisdictions with significant shortfalls in planning for and accommodating need then identify and implement actions to address the shortfalls.</p> <p>Occurs every ten years, starting in 2029</p> <p>Corresponding CPP Amendments: 19, 26, 30</p>	<ul style="list-style-type: none"> a. No earlier than 2024, the AHC develops and recommends to the GMPC the mid-cycle review and adjustment process. b. The GMPC includes in its motion to the King County Council language directing the AHC to commence no earlier than 2024 a collaborative process to design and recommend to them a mid-cycle check-in and adjustment program. The AHC should consider the need to define what data will be used in the assessment, define significant shortfalls in planning for and accommodating housing needs, and identify what role, if any, the GMPC will play in recommending whether adjustments are needed. Also, the AHC should develop and recommended CPP amendments needed to implement their recommendations. c. AHC develops and GMPC decides on program design and any necessary CPP amendments no earlier than 2024. d. County AHC staff work with Commerce to identify opportunities to align implementation progress report standards and processes to be developed by Commerce in response to HB 1241.

Exhibit 2: Housing-Focused Comprehensive Plan Review Standards

The Affordable Housing Committee (AHC) and staff will use the following comprehensive plan review standards to evaluate alignment between jurisdictional comprehensive plans and Countywide Planning Policy (CPP) Housing Chapter policies during the AHC's recommended housing-focused comprehensive plan review process. The accountability framework described in Exhibit 1 details the process by which these standards will be used.

1. The policies and related appendices in the plan evidently address all CPP Housing Chapter policies.
2. The plan or related appendices articulate implementation strategies for Housing Chapter CPPs requiring policy adoption and/or implementation: H-2, H-10, H-11, H-12, H-13, H-14, H-15, H-16, H-17, H-18, H-20, H-21, H-22, H-23, H-24.¹⁰ 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 (by year).¹¹
3. The plan lays out meaningful¹² 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

¹⁰ Note that policy numbers are subject to change if CPP amendments are adopted.

¹¹ Request for regulatory and non-regulatory measures to implement comprehensive plans are supported by language in the Washington Administrative Code (WAC) 365-196 650 [\[link\]](#).

¹² Meaningful policies are designed and can be reasonably expected to achieve a material, positive change in the jurisdiction's ability to equitably meet housing needs and advance CPP Housing Chapter goals.