

Memo

To: King County Affordable Housing Committee Members
From: McCaela Daffern, Regional Affordable Housing Implementation Manager
cc: Housing Interjurisdictional Team
Date: April 1, 2022
Re: GMPC Motion 21-1 Draft Accountability Framework

Purpose of April AHC Meeting

Growth Management Planning Council (GMPC) Motion 21-1 requires the Affordable Housing Committee (AHC or Committee) to recommend to the GMPC an accountability and implementation framework for equitably meeting affordable housing needs across King County.

At the April 8 AHC meeting, Committee members will review a set of actions for potential inclusion in the accountability framework. Members will direct staff which actions to further analyze, combine, or amend, through discussion of policy questions.

Staff will finalize the proposed framework for Committee consideration and potential approval at the May 18 AHC meeting. Discussion questions for each policy can be found in the “Questions for the AHC” section of the summary Table 1 on page 3 and the detailed Table 2 starting on page 4.

Background

The 2021 amended Countywide Planning Policies (CPPs) Housing Chapter creates a shared framework for housing planning across jurisdictions in King County, in accordance with the Washington State Growth Management Act and Puget Sound Regional Council’s (PSRC) VISION 2050 multicounty planning policies. Jurisdictions in King County use the CPP Housing Chapter framework to guide the housing element of their comprehensive plans.

While the 2021 amendments to the CPP Housing Chapter included new provisions to ensure a more equitable and accountable framework for addressing countywide affordable housing need, at their June 2021 meeting, several GMPC members raised concerns that these provisions were insufficient. These members proposed additional amendments to establish clearer jurisdictional goals, transparent reporting, more oversight and accountability, or new incentives.¹ However, given the complexity of the amendments and short timeframe to adopt, the GMPC chose not to consider these amendments and instead passed Motion 21-1, which tasked the Affordable Housing Committee with recommending potential updates to the CPPs and the comprehensive planning process that would ensure jurisdictional accountability and implementation towards countywide affordable housing goals in the CPP Housing Chapter.

Potential CPP Housing Chapter Accountability Actions

Table 1 summarizes and Table 2 provides additional detail on four potential accountability framework actions for AHC consideration. Staff identified two types of accountability actions and offer two levels of intensity for each type. The second action under each type is inclusive of the first action.

Type 1 Actions: Comprehensive Plan Adoption Oversight

- 1a. **Review plans:** Before adoption of a periodic update to a comprehensive plan, AHC County staff or the AHC reviews draft plans for alignment with the CPP Housing Chapter and comments.
- 1b. **Review and certify plans:** After plan review and adoption, the GMPC issues plan certification decision.

Type 2 Actions: Comprehensive Plan Implementation Oversight

- 2a. **Monitor and report:** Annually after adoption of a periodic update to a comprehensive plan, the AHC measures jurisdictional progress to plan for and accommodate affordable housing targets in dashboard using standardized benchmarks and housing data trends.

¹ Unadopted proposed amendments can be found in Appendix B.

2b. Monitor, report and require adjustments: Five years after plan adoption, the GMPC reviews the information collected through monitoring and identifies jurisdictions with significant shortfalls in planning for and accommodating affordable housing targets. The GMPC requires those jurisdictions to take reasonable measures to adjust plans or land use maps to address significant shortfalls.

When reviewing the potential framework actions, please keep in mind:

- Each action includes descriptions of AHC and jurisdictional roles, key considerations and tensions, and questions that the AHC should consider in their deliberations.
- The actions offered are not mutually exclusive. Actions can be combined and amended in unique ways upon adoption.
- It would take significant new jurisdictional staffing to implement all actions. Subregional and multicounty entities may have increased staffing needs as well to support jurisdictional planning needs.
- As required by recent changes to the Growth Management Act,² the first step in this framework involves establishing targets in the CPP Housing Chapter to clarify what jurisdictions must plan for and accommodate in their comprehensive plan. The AHC will have its first opportunity to shape the target setting process at its May 18 meeting.
- The framework assumes that near-term jurisdictional progress to meet targets should be assessed using other performance benchmarks beyond just housing unit production. Housing unit production is a lagging indicator and the need for lower-income households will not be met by policy and strategy implementation alone.
- This approach intentionally resembles current state and multicounty review and accountability processes, to create a process that is familiar, well-timed, and coordinated with and additive to the current framework. See Appendix A for more information on current processes and a summary of gaps this framework seeks to fill.

² House Bill (HB) 1220 (2021) requires jurisdictions to plan for and accommodate housing affordable to all economic segments, identify the number of housing units necessary to manage projected growth including emergency housing, shelter, and permanent supportive housing, as provided by the Department of Commerce, and link jurisdictional and countywide goals in housing elements [\[link\]](#).

Table 1 summarizes the detailed information found in Table 2.

Table 1. Summary of Potential Accountability Framework Actions

Action	<i>Type 1 Actions: Comprehensive Plan Adoption Oversight</i>		<i>Type 2 Actions: Comprehensive Plan Implementation Oversight</i>	
	1a. Review Plans	1b. Review & Certify Plans	2a. Monitor & Report	2b. Monitor, Report & Require Adjustments
Summary	AHC offers early guidance and assistance to jurisdictions on CPP Housing Chapter alignment. Before adoption of a periodic update to a comprehensive plan, County AHC staff or the AHC reviews plans for alignment with the CPP Housing Chapter and comments.	Everything in Action 1a plus, after plan adoption, GMPC issues plan certification decision.	After periodic updates to comprehensive plans are adopted, AHC measures jurisdictional progress to plan for and accommodate affordable housing targets in dashboard using standardized benchmarks and housing data trends.	Everything in Action 2a plus, five years after plan adoption, the GMPC reviews the information collected through monitoring and identifies jurisdictions with significant shortfalls in planning for and accommodating affordable housing targets. The GMPC requires those jurisdictions to take reasonable measures to adjust plans or land use maps to address significant shortfalls.
Frequency	~1.5-year period every ten years, starting in late 2023 and ending in early 2025	~2.5-year period every ten years, starting in late 2023 and ending in early 2026	Annually, starting in 2024	Monitor/report annually, starting in 2024; Adjust once every ten years, starting in 2029
Major Considerations	Increased level of effort for AHC and jurisdictional staff	Highest level of effort for AHC, GMPC, and jurisdictional staff Potential for significant back-and-forth if a jurisdiction doesn't meet the certification standard	Increased level of effort for AHC to set benchmarks in 2022 Challenge in finding benchmarks applicable to all or subsets of jurisdictions	Increased level of effort for AHC and GMPC to set standards in 2024 and review in 2029 Challenge in setting clear standards for adequacy/inadequacy
Action-specific Questions	1. Do you support the AHC offering early guidance and assistance to jurisdictions during the development of a periodic update to a comprehensive plan? Why or why not? 2. Do you support empowering the County AHC staff or AHC to review periodic updates to comprehensive plans and provide comments prior to adoption? Why or why not?	1. Do you support empowering the GMPC, with assistance from the AHC, to issue plan certification decisions? Why or why not?	1. Do you support modifying the current annual monitoring system to measure benchmark and data trends that more closely align with this framework? Why or why not? 2. Do you support comparing jurisdictions based on their progress toward specific benchmarks? Why or why not?	1. Do you support a midcycle review of jurisdictional progress to accommodate their affordable housing targets? Why or why not? 2. Do you support empowering the GMPC, with assistance from the AHC, to require adjustments to address shortfalls? Why or why not?
Common Question	What additional information would you like staff to offer for the May AHC meeting?			

Table 2. Detailed Overview of Potential Accountability Framework Actions

1a. Review Plans

- Before adoption of a periodic update to a comprehensive plan, County AHC staff or the AHC reviews draft plans for alignment with the CPP Housing Chapter and comments.
- Occurs over about a 1.5-year period every ten years, starting in late 2023 and ending in early 2025
- Relates to GMPC 2021 CPP Major Amendments 17, 18, 20 (see Appx. B)

Roles

- County AHC staff work with PSRC and Commerce to identify opportunities to align guidance, review standards, and processes.
- AHC establishes plan review standards, issues early jurisdictional guidance, and invites staff to seek assistance from AHC County staff well in advance of adoption.
- Jurisdictions submit draft plans to the County AHC staff for review at least 60 days prior to planned adoption.
- County AHC staff review draft plans, including the land use map, and coordinate with jurisdictional staff on plan adjustments to address misalignment and resolve potential certification issues before the plan is finalized and adopted.³
- County AHC staff review draft housing elements and prepare comment letters for AHC issuance. Comments focus on areas of additional work needed to align with CPP Housing Chapter before the plan is finalized and adopted.
- Jurisdictions with adopted housing elements that remain inconsistent with the CPPs assume the risk of a potential legal challenge.

Considerations

- AHC Impact*
 - AHC will spend most of its meeting time in 2024 and early 2025 and every ten years thereafter issuing comment letters if plan certification is not recommended. See *Action 2, Certify Plans* for impacts if plan certification is recommended.
- Staff Impact*
 - Staff (jurisdictional, AHC County, ARCH/ SKHHP) will spend significant time once every ten years engaging in county-level plan review.
- Tensions*
 - Jurisdictions will need to allocate additional staff resources. Small and medium-sized cities may struggle more with the incremental staffing impact.
 - AHC members may feel uncomfortable commenting on jurisdiction’s plans.

Questions for the AHC

1. Do you support the AHC offering early guidance and assistance to jurisdictions during the development of a periodic update to a comprehensive plan? Why or why not?
2. Do you support empowering the County AHC staff or AHC to review periodic updates to comprehensive plans and provide comments prior to adoption? Why or why not?
3. What additional information would you like staff to offer for the May AHC meeting?

³ If AHC also selects plan certification, this communication would reference the standard for certification as well.

1b. Review & Certify Plans

- Everything in *Action 1a* plus, after adoption of periodic update to a comprehensive plan, GMPC issues plan certification decision for alignment with the CPP Housing Chapter. Note, if the AHC elects to pursue plan certification, it must also pursue plan review.
- Occurs over about a 2.5-year period every ten years, starting in late 2023 and ending in early 2026
- Relates to GMPC 2021 CPP Major Amendments 17, 20 (see Appx. B)

Roles

- a. AHC conducts plan review process outlined in *Action 1a: Review Plans* except for *Step e*. If certification is selected as an action by the AHC, the AHC does not issue a formal comment letter on a draft plan. Instead, County AHC staff communicate recommended plan improvements to jurisdictional staff prior to plan adoption. County AHC staff report to the AHC on plan review efforts, noting areas of strength identified by staff in each draft comprehensive plan and areas staff recommended for additional work.
- b. County AHC staff work with PSRC to identify opportunities to align guidance, review standards, and processes.
- c. County AHC staff, in consultation with IJT/HIJT, review adopted period updates to comprehensive plans for alignment with CPP Housing Chapter. They work with the jurisdiction to prepare a report with staff's certification recommendation, summarizing how the plan is consistent with the CPP Housing Chapter.
- d. AHC considers the staff report and issues a plan certification recommendation to GMPC on whether the plan is consistent with the CPP Housing Chapter.
- e. GMPC reviews the AHC's recommendation and issues a certification decision, a conditional certification, or decision not to certify.
- f. Jurisdictions with conditionally certified plans enter into an agreement with the GMPC to address remaining work items to be in full conformity with criteria for certification.
- g. Jurisdictions with uncertified plans assume the risk of a potential legal challenge.

Considerations

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|---------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <i>AHC Impact</i> | <ul style="list-style-type: none">• AHC will spend a lot of meeting time in 2025 and early 2026 and every ten years thereafter reviewing and approving certification recommendations. |
| <i>Staff Impact</i> | <ul style="list-style-type: none">• In addition to time spent on plan review, staff (jurisdictional, AHC County, HIJT/IJT, ARCH/ SKHHP) will need to spend time once every ten years, after comprehensive plans are adopted, engaging in county-level plan certification. |
| <i>Tensions</i> | <ul style="list-style-type: none">• Jurisdictions will need to allocate additional staff resources. Small and medium-sized cities may struggle with the incremental staffing impact more.• Jurisdictions may not want other jurisdictions on the GMPC issuing certification decisions about their plans.• This would represent a substantive role change for the GMPC. |

Questions for the AHC

1. Do you support empowering the GMPC, with assistance from the AHC, to issue plan certification decisions? Why or why not?
2. What additional information would you like staff to offer for the May AHC meeting?

2a. Monitor & Report

- After comprehensive plans are adopted, AHC measures jurisdictional progress to plan for and accommodate affordable housing targets in dashboard using standardized benchmarks and housing data trends.
- Occurs annually, starting in 2024
- Relates to GMPC 2021 CPP Major Amendments 13, 14, 15, 19 (see Appx. B)

Roles

- a. County AHC staff, in consultation with the IJT/HIJT, determine what housing data trends and performance benchmarks will be tracked annually across all jurisdictions or subregions.
- b. County AHC staff work with PSRC to align jurisdictional housing data collection efforts.
- c. County 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.
- e. In response to monitoring, AHC periodically issues reports or recommendations on how to reach targets more effectively.

Considerations

- AHC Impact*
- AHC will spend time in 2022 deliberating and setting benchmarks and data trends to track.
- Staff Impact*
- Staff (jurisdictional, AHC County, HIJT/IJT, ARCH/ SKHHP) will need to spend time in 2022 establishing recommended benchmarks and data trends to track annually and what standard jurisdictions will be compared to.
 - Staff will experience annual impacts to support annual monitoring and reporting, but likely not more than was already anticipated in the adopted 2021 CPPs.
- Tensions*
- Challenges associated with deciding on benchmarks and data trends to track and issuing comparisons/ evaluations of jurisdictional performance.
 - Concerns that annual reporting alone—without the ability to hold jurisdictions accountable for poor performance or require adjustments if needed—may not meaningfully drive policy change.

Questions for the AHC

1. Do you support modifying the current annual monitoring system to measure benchmark and data trends that more closely align with this framework? Why or why not?
 2. Do you support comparing jurisdictions based on their progress toward specific benchmarks? Why or why not?
 3. What additional information relating to the action would you like staff to offer for the May AHC meeting?
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2b. Monitor, Report, & Require Adjustments

- Everything in *Action 2a* plus, five years after plan adoption, the GMPC reviews the information collected through monitoring and identifies jurisdictions with significant shortfalls in planning for and accommodating affordable housing targets. The GMPC requires those jurisdictions to take reasonable measures to adjust plans or land use maps to address significant shortfalls.
- Monitor/report annually, starting in 2024; Adjust once every ten years, starting in 2029
- Relates to GMPC 2021 CPP Major Amendments 13, 15, 17 (see Appx. B)

Roles

- a. The AHC conducts the activities in *Action 2a: Monitor & Report*.
- b. County AHC staff, in consultation with IJT/HIJT, work with jurisdictional staff to establish adequacy standards for jurisdictional efforts to plan for and accommodate affordable housing targets.
- c. County AHC staff work with Commerce to identify opportunities to align implementation progress report standards and processes.⁴
- d. County AHC/GMPC staff, in consultation with the IJT/HIJT, work with jurisdictional staff to compile midcycle comprehensive plan assessment of progress toward housing benchmarks. using data collected through annual reporting in *Action 2a* and possibly implementation progress information reported to Commerce.
- e. AHC determines whether a jurisdiction's efforts to plan for and accommodate their targets was adequate.
- f. AHC issues determinations of adequacy.
- g. Jurisdictions that do not demonstrate adequate progress must work with AHC to explain and/or take reasonable steps to address inadequacies.
- h. Jurisdictions that do not take reasonable measures to address inadequacies assume the risk of a potential legal challenge.

Considerations

- AHC Impact*
- AHC will spend a lot of meeting time in 2029/2030 and every ten years thereafter reviewing assessments and determining adequacy.
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- Staff Impact*
- Jurisdictional staff, AHC County AHC staff, HIJT/IJT staff, and ARCH and SKHHP staff will need to spend time once every ten years compiling assessments.
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- Tensions*
- Jurisdictions will need to allocate new resources to staff the effort. Small and medium-sized cities may struggle with the incremental staffing impact more.
 - Challenges associated with setting standards for adequacy/ inadequacy

Questions for the AHC

1. Do you support a midcycle review of jurisdictional progress to accommodate their affordable housing targets? Why or why not?
2. Do you support empowering the GMPC, with assistance from the AHC, to require adjustments to address shortfalls? Why or why not?
3. What additional information relating to the actions would you like staff to offer for the May AHC meeting?

⁴ House Bill 1241 requires certain jurisdictions to submit an implementation progress report to Commerce five years after comprehensive plan adoption. If any action needed to implement changes in the most recent comprehensive plan update has not occurred, to create a work plan to take any needed actions within two years. There may be opportunities to coordinate with Commerce to align a countywide process with the new statewide process through early design and development of a local process and standards. See E2SHB 1241, Subsection 9 (a), 67th Legislature, 2022 Regular Session (Wash. 2022) [[link](#)]




APPENDIX A

Current Comprehensive Planning Housing Accountability and Implementation Process and Gaps

King County and its cities must update their comprehensive plans every ten years.⁵ When taken together, all the comprehensive plans of King County jurisdictions must “plan for and accommodate” the existing and projected housing needs of the county over a 20-year period.⁶ Jurisdictions primarily plan for future housing needs in their comprehensive plan through their housing element, however a jurisdiction’s ability to meet its housing needs is shaped by policies throughout a comprehensive plan.

The current update process with a focus on housing is outlined in Figure 1.

Figure 1. Current Comprehensive Planning Process

 <p>DRAFT Underway or about to launch</p>	<ul style="list-style-type: none"> • Jurisdictions update comprehensive plans in alignment with requirements of the Growth Management Act (GMA), multicounty planning policies (VISION 2050), and countywide planning policies (King County CPPs). Jurisdictions plan for housing needs through the development of a housing-specific element of the plan (known as a “housing element”). However, planning for housing is also shaped by other comprehensive planning policies, including policies addressing the environment, development patterns, the economy, transportation, and the provision of public services, as well as policies aimed at reducing disparities in equity and health outcomes for King County residents. <ul style="list-style-type: none"> ○ To start the housing element work, jurisdictions first conduct an inventory and analysis of existing and projected housing needs and conditions and evaluate recent progress to address housing needs and collaborate regionally to address housing needs.⁷ Jurisdictions also perform tasks related to other plan elements, such as evaluate if they have sufficient zoning capacity to accommodate their projected growth targets.⁸ ○ Jurisdictions then develop draft comprehensive plan updates with policies that address the needs identified and accommodate their projected growth.⁹ • Puget Sound Regional Council (PSRC) and the State Department of Commerce provide guidance and technical assistance to ensure alignment with VISION 2050, the Regional Transportation Plan and/or the GMA.
 <p>REVIEW 60 days before adoption</p>	<ul style="list-style-type: none"> • Jurisdictions release public review drafts of plans and notify Commerce of their intent to adopt at least 60 days before scheduled adoption. • PSRC reviews draft plans for consistency with regional goals, including VISION 2050 and the Regional Transportation Plan,¹⁰ and Commerce reviews for consistency with state goals, including the GMA.¹¹ • Jurisdictions incorporate feedback on the public review drafts into final plans.
 <p>ADOPT By December 2024</p>	<ul style="list-style-type: none"> • Jurisdictions adopt their plan by December 31, 2024. • After adoption, PSRC certifies the transportation-related provisions of the plans. • Anyone who provided comments on the public review draft may bring a challenge to the Growth Management Hearings Board within 60 days after adopted plan publication.

⁵ HB 1241 passed by the State Legislature in 2022, amended the frequency of periodic, major comprehensive updates for jurisdictions in King County from every eight to every ten years [\[link\]](#).

⁶ For a more in-depth overview, visit MSRC’s webpage on the comprehensive plan update process [\[link\]](#).

⁷ 2021 King County Countywide Planning Policies H-4 through 8 [\[link\]](#)

⁸ Under the GMA, King County, in coordination with the cities in King County, adopts growth targets for the 20-year planning period. Growth targets are policy statements about the amount of overall housing and employment growth each jurisdiction is planning to accommodate within its comprehensive plan.

⁹ See policies H-9 through 24 for specific housing policies in the 2021 King County CPPs [\[link\]](#).

¹⁰ Visit PSRC’s Plan Review webpage for more information on their plan review and certification process [\[link\]](#).

¹¹ The review gives state agencies the opportunity to review and comment on the consistency of proposed policies or regulations with the GMA. Their written correspondence may note inconsistencies with the GMA. Although 60 days’ notice before adoption is required, earlier review is recommended [\[link\]](#). Visit Commerce’s Growth Management Submitting Materials webpage for more information on the notice requirement [\[link\]](#).



IMPLEMENT
2025-2034

- After adoption, **jurisdictions implement their comprehensive plan policies.** Implementation takes three main forms: 1) development regulations that control the use of land; 2) capital projects which are financed, designed, built, and maintained by local governments; and 3) public or private programs that involve or are endorsed by local governments.¹²
- **Jurisdictions notify Commerce of their intent to adopt** development regulations at least 60 days before scheduled adoption, unless approved for expedited review (see footnote 11).



MONITOR
Annually (starting in 2024) and every ten years (2029)

- Specific to the CPP Housing Chapter, annually, **jurisdictions report basic housing data** to King County to monitor progress toward meeting housing growth targets, countywide need,¹³ and eliminating disparities in access to housing and neighborhood choices. King County staff update the online countywide [dashboard](#) with data.¹⁴
- **Jurisdictions also report zoning information** to King County about four years after comprehensive plan adoption to assesses whether jurisdictions provided sufficient zoning capacity to accommodate their projected employment and housing growth targets.¹⁵ This is not an assessment of progress to accommodate housing need at different economic segments.
- **Certain jurisdictions report housing implementation progress and effect on housing affordability and availability**, among other items, to Commerce five years after comprehensive plan adoption, and if any action needed to implement changes in the most recent comprehensive plan update has not occurred, to create a work plan to take any needed actions within two years.¹⁶



ADJUST
By December 2034

- **Jurisdictions review and amend housing strategies and actions** when monitoring indicates that adopted strategies are not resulting in adequate affordable housing to meet the countywide need and **consider amendments** to land use policies and the land use map where they present a significant barrier to the equitable distribution of affordable housing.¹⁷
- If monitoring has found a jurisdiction hasn't provided sufficient capacity to accommodate their overall economic and housing growth targets, **that jurisdiction takes reasonable measures to adjust** their plans, policies, and/or land use map to address the deficiency.

Identified Gaps

Considering the process outlined above, staff identified the following gaps in which a countywide entity like the GMPC or AHC could reinforce consistency, and accountability in affordable housing plans and regulations across King County and support jurisdictions in effective implementation of the policies laid out in their housing elements. In addition to gaps in the current system, HIJT members also noted concerns about staff capacity, particularly in small and medium cities, to engage with various review bodies.

- Draft
 - No entity provides technical assistance to jurisdictions to help them create policies aligned with the CPP Housing Chapter.
- Review
 - No entity reviews and provides comment on draft comprehensive plans for alignment with the CPP Housing Chapter.

¹² See Oct. 2013 MSRC blog post *From Vision to Reality: Implementing your Comprehensive Plan* by Joseph Tovar [\[link\]](#).

¹³ Countywide need refers to the number of additional, affordable homes needed by 2044 so that no household earning at or below 80 percent of area median income spends more than 30 percent of their income on housing. Countywide affordable housing need is distinct from housing growth targets in that it accounts for current undersupply of affordable homes at different economic segments and is a measure of what's needed to eliminate housing cost burden for low-income households, not what's needed to accommodate projected housing growth.

¹⁴ 2021 King County Countywide Planning Policies H-25 and H-26 [\[link\]](#)

¹⁵ Visit King County's Urban Growth Capacity Report webpage to learn more [\[link\]](#).

¹⁶ E2SHB 1241, Sec. 1 (9)(b)(i), 67th Legislature, 2022 Regular Session (Wash. 2022) [\[link\]](#)

¹⁷ 2021 King County Countywide Planning Policies H-27 [\[link\]](#)

- Adopt
 - No entity certifies adopted comprehensive plans for alignment with the CPP Housing Chapter.
- Implement
 - Some jurisdictions don't implement all housing policies before their next periodic update to their comprehensive plan.
- Monitor
 - The data that jurisdictions are required to report to the County annually does not include objective standards for measuring progress towards planning for and accommodating housing needs and cannot be used to measure jurisdictional gaps. The lack of clear benchmarks makes it difficult to assess if a jurisdiction's plan and policy implementation has been adequate and how progress compares to peer jurisdictions.
 - Jurisdictions lack the staff capacity to support complex data requests.
- Adjust
 - There is no proactive external review of jurisdictional progress towards countywide CPP Housing Chapter after enough time has passed to measure results. There is also no external entity that recommends or requires adjustments if progress falls short. The current CPPs rely on a model of jurisdictional self-assessment and adjustment. The 2021 CPP update did strengthen language around this, but it still relies on jurisdictions to hold themselves accountable. Without oversight and the ability to compel more responsive and effective planning, additional affordable housing will likely be concentrated in areas with an already higher percent share of housing affordable to low-income households—further exacerbating patterns of inequity.

APPENDIX B

GMPC Countywide Planning Policies Housing Chapter Proposed Major Amendments referenced in GMPC Motion 21-1, June 23, 2021

Amd. #	CPP Policy # & Sponsor	Proposed Amendment: Major	Sponsor Effect Statement
12	<p>Narrative Text, Housing Chapter</p> <p>CM Thomas McLeod, City of Tukwila</p>	<p>The Countywide Planning Policies in the Housing Chapter support a range of affordable, accessible, and healthy housing choices for current and future residents. Further, they respond to the legacy of discriminatory housing and land use policies and practices (e.g. redlining, racially restrictive covenants, exclusionary zoning, etc.) that have led to significant racial and economic disparities in access to housing and neighborhoods of choice. These disparities affect equitable access to well-funded schools, healthy environments, open space, and employment. The policies reflect the region’s commitment to addressing the 2018 findings of the Regional Affordable Housing Task Force (Task Force). Key findings include:</p> <ul style="list-style-type: none"> • Dramatic housing price increases between 2012 and 2017 resulted in an estimated 156,000 extremely low-, very low-, and low-income households spending more than 30 percent of their income on housing (housing cost burdened); and • Black, Hispanic, Indigenous, and extremely low-income households are among those most disproportionately impacted by housing cost burden <p>While significant new housing growth needed is necessary to reach overall King County housing growth targets, new the ability of the region’s housing market growth will not sufficiently to address the housing needs for of low-income households is limited. Consequently, A large majority much of the need for low- income housing will need to be addressed with-through:</p> <ul style="list-style-type: none"> A) the creation of units restricted to income-eligible households - both rent-restricted units and resale restricted homes (“income-restricted units”); and, B) the preservation of existing naturally occurring affordable housing where it still exists; <p>Building on the Task Force’s work, this chapter establishes goals and policies intended to address the a countywide need for affordable housing. The purpose is to ensure the provision of sufficient defined as the additional housing units needed in King County by 2044 so that no household with an income at, or below, 80 percent of Area Median Income (AMI) is housing cost burdened. While the need is expressed in countywide terms, These CPPs also recognize that housing affordability varies significantly across jurisdictions. In addressing housing needs, less affordable jurisdictions will need to take significant action to increase affordability across all income levels for low-income housing, while more affordable jurisdictions will need to take significant action to preserve affordability and plan for housing that serves all economic segments of the population. Moreover, to redress past inequities, less affordable jurisdictions will need to subsidize and incentivize much more regulated affordable</p>	<p>Clarifying text. Adds housing preservation as a tool for addressing need. Adds statement about different historical housing patterns and actions needed based on that history.</p>

		<p><u>housing while historically affordable jurisdictions may need to work to attract market rate housing—to help reverse cycles of investment/disinvestment, lift households out of poverty and give more low-income people access to opportunity.</u> To succeed, all communities must <u>address housing need where it is greatest—housing affordable to extremely low- income households.</u></p> <p><u>When taken together, all the comprehensive plans of King County jurisdictions must “plan for and accommodate” the existing and projected housing needs of the county (RCW 36.70A.020 and 36.70A.070). The policies below set a framework for individual and collective action and accountability to meet the countywide need and eliminate disparities in access to housing and neighborhoods of choice. These policies guide jurisdictions through a four-step process:</u></p> <ol style="list-style-type: none"> <u>1. Conduct a housing inventory and analysis;</u> <u>2. Implement policies and strategies to meet housing needs equitably;</u> <u>3. Measure results and provide accountability; and</u> <u>4. Adjust strategies to meet housing needs.</u> <p><u>Overarching Goal: Provide a full range of affordable, accessible, healthy, and safe housing choices to every resident in King County. All jurisdictions will work to:</u></p> <ul style="list-style-type: none"> <u>• preserve, improve, and expand their housing stock;</u> <u>• promote fair and equitable access to housing for all people;</u> <u>• create housing opportunities for Black, Hispanic, Indigenous, and extremely low-income households; and, take actions that eliminate race-, place-, ability-, and income-based housing disparities</u> 	
13	DP-14 CM Thomas McLeod, City of Tukwila	<p>All jurisdictions shall plan. Plan to accommodate housing and employment targets <u>in all jurisdictions.</u> This includes:</p> <ul style="list-style-type: none"> • a) Using the adopted targets as the land use assumption for their comprehensive plan; • b) Establishing local growth targets for regional growth centers and regional manufacturing-industrial centers, where applicable; • c) Adopting Ensuring adopted comprehensive plans and zoning regulations that provide capacity for residential, commercial, and industrial uses that is sufficient to meet 20- year growth needs targets and is consistent with the desired growth pattern described in VISION 2040 2050; and affordable housing and equity goals established in the CPP’s; • d) Ensure growth for jurisdictions with less than 50% of their total housing stock affordable at or 	I would like to hold jurisdictions to minimum growth standards.

		<p>below 100% AMI, growth targets must be greater than or equal to 50% of the existing gap. Applicable to all jurisdictions with 1500 or more total housing units.</p> <p>For example, if a jurisdiction has 10,000 housing units and 4,000 are affordable at or below 100% AMI, the jurisdiction has a gap of 1000 units affordable at or below 100% AMI. Therefore, their housing target must be at least half of the 1000 unit gap or 500 units.</p> <ul style="list-style-type: none"> • d e) Coordinating Ensuring adopted local water, sewer, transportation, utility, and other infrastructure plans and investments among agencies, including special purpose district plans, are consistent in location and timing with adopted targets as well as regional and countywide plans; and • e f) Transferring and accommodating unincorporated area-housing and employment targets as annexations occur. 													
14	H-1 CM Thomas McLeod, City of Tukwila	<p>All comprehensive plans in King County combine to address the countywide need for housing affordable to households with low, very low, and extremely low incomes, including those with special needs, at a level that calibrates with the jurisdiction's identified affordability gap for those households and results in the combined comprehensive plans in King County meeting countywide need. The combined comprehensive plans in King County meeting countywide need. The combination of all the comprehensive plans in King County should address the countywide need for housing affordable to households with low, very low, and extremely low incomes, including people with special needs. Each jurisdiction's comprehensive plan should: 1) preserve, improve, and expand the local housing stock, 2) promote fair and equitable access to housing, 3) create, or preserve where already existing, housing opportunities for Black, Hispanic, Indigenous, and extremely low-income households, and 4) eliminate race-, place-, ability-, and income-based housing disparities. <u>The countywide need for housing in 2044 by percentage of AMI is:</u></p> <table data-bbox="682 1198 1373 1393"> <tr> <td><u>30 percent and below AMI (extremely low)</u></td> <td><u>15 percent</u></td> </tr> <tr> <td><u>of total housing supply</u></td> <td></td> </tr> <tr> <td><u>31-50 percent of AMI (very low)</u></td> <td><u>15 percent</u></td> </tr> <tr> <td><u>of total housing supply</u></td> <td></td> </tr> <tr> <td><u>51-80 percent of AMI (low)</u></td> <td><u>19 percent</u></td> </tr> <tr> <td><u>of total housing supply</u></td> <td></td> </tr> </table>	<u>30 percent and below AMI (extremely low)</u>	<u>15 percent</u>	<u>of total housing supply</u>		<u>31-50 percent of AMI (very low)</u>	<u>15 percent</u>	<u>of total housing supply</u>		<u>51-80 percent of AMI (low)</u>	<u>19 percent</u>	<u>of total housing supply</u>		Clarifies that each jurisdiction has a role in planning for affordable housing, promoting fair housing, and creating or preserving housing as part of addressing countywide need.
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15	H-1 CM Pam Stuart, City of Sammamish	<p>All comprehensive plans in King County combine to address the countywide need for housing affordable to households with low, very low, and extremely low incomes, including those with special needs, at a level that calibrates with the jurisdiction's identified affordability gap for those households and results in the combined comprehensive plans in King County meeting countywide need. The countywide need for housing in 2044 by percentage of AMI is:</p> <table border="0"> <tr> <td>30 percent and below AMI (extremely low)</td> <td>15 percent of total housing supply</td> </tr> <tr> <td>31-50 percent of AMI (very low)</td> <td>15 percent of total housing supply</td> </tr> <tr> <td>51-80 percent of AMI (low)</td> <td>19 percent of total housing supply</td> </tr> </table> <p><u>AND each jurisdiction's comprehensive plan must show how the jurisdiction will achieve a minimum:</u></p> <table border="0"> <tr> <td>30 percent and below AMI (extremely low)</td> <td>8 percent of total housing supply</td> </tr> <tr> <td>31-50 percent of AMI (very low)</td> <td>8 percent of total housing supply</td> </tr> <tr> <td>51-80 percent of AMI (low)</td> <td>10 percent of total housing supply</td> </tr> </table> <p><u>OR a minimum of 40% of total housing supply at or below 100% AMI</u></p> <p><u>OR if neither of the above can reasonably be achieved, for each AMI bracket not meeting the county wide targets of 15%, 15%, and 19%, respectively, the jurisdiction must submit a plan to increase their total housing stock in that bracket by 20%.</u></p>	30 percent and below AMI (extremely low)	15 percent of total housing supply	31-50 percent of AMI (very low)	15 percent of total housing supply	51-80 percent of AMI (low)	19 percent of total housing supply	30 percent and below AMI (extremely low)	8 percent of total housing supply	31-50 percent of AMI (very low)	8 percent of total housing supply	51-80 percent of AMI (low)	10 percent of total housing supply	<p>The effect is to ensure that the concerns raised in public comment from many individuals and jurisdictions across the county are addressed and that imbalances in affordable housing are being addressed by every jurisdiction. We should have CPPs that ensure every jurisdiction is making plans that will achieve progress towards providing our region housing in the needed price points. The CPPs should ensure we stop the trends whereby continuing to concentrate affordable housing in areas with the fewest resources perpetuates current inequities. While there is recognition that these imbalances cannot be corrected immediately, concrete plans need to be put in place from every jurisdiction where imbalances exist in order to meet the overall countywide goals. Providing minimums for every jurisdiction is a safety net only as every jurisdiction with imbalances should be submitting plans to correct those imbalances per the CPPs. If jurisdictions are meeting all goals stated in the CPPs, these minimums will never be needed.</p>
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16	H-3X, New Policy CM Thomas McLeod, City of Tukwila	<p><u>H-3X Prioritize the use of local and regional resources to provide housing access for very low-income families in high opportunity areas (i.e. areas with high quality schools, jobs, transit and access to parks, open space, and clean air, water, and soil) and avoid actions that perpetuate historical patterns of poverty concentration and unequal access to opportunity for BIPOC and low-income communities.</u></p>	<p><u>Promotes seeking to invest in access to affordable housing in high-opportunity areas.</u></p>												
17	H-4 CM Pam Stuart, City of Sammamish	<p>Evaluate the effectiveness of existing housing policies and strategies to meet a significant share of countywide need. Identify gaps in existing partnerships, policies, and dedicated resources for meeting the countywide need and eliminating racial and other disparities in access to housing and neighborhoods of choice. <u>Provide a plan to fill all identified gaps. Failure to provide a revised plan to fill the identified gaps will trigger a county review of the jurisdiction's land use policies.</u></p>	<p>To ensure ongoing progress toward filling gaps in affordable housing and the inequities that follow. Without any action if gaps are not addressed, the policies will likely not be effective.</p>												
18	H-7 CM Pam Stuart, City of Sammamish	<p>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. <u>Provide support proportionate to jurisdictions' median income and current housing gap – ie where gaps in affordable housing stock are the larger and median incomes are higher, financial support will be proportionately more.</u></p>	<p>To ensure that all jurisdictions are contributing proportionately to the fill the affordable housing gaps.</p>												

19	H-25 CM Thomas McLeod, City of Tukwila	<p>H-20 Implement, promote and enforce fair housing policies and practices so that every person in the county has equitable access and opportunity to thrive in their communities of choice, regardless of...</p> <p>Measure Results and Provide Accountability. Each jurisdiction has a responsibility to address its share of the countywide housing need. The county and cities will collect and report housing data to help evaluate progress in meeting this shared responsibility. The county will help coordinate a transparent data collection and sharing process with cities.</p> <p>H-25 The county, or third-party consultant, will annually provide transparent, ongoing information measuring jurisdictions' progress toward meeting countywide affordable housing need, according to H-24, using public-facing tools such as the King County's Affordable Housing Dashboard.</p>	<p>H-20 says, enforce fair housing policies and practices..., and H-23 says, each jurisdiction has a responsibility to address its share of the countywide housing need. What I question is how are we enforcing, or overseeing that each jurisdiction does their fair share? I feel using data on the KC Affordable Housing Dashboard does not elevate jurisdictional performance enough. I would like to see a 3rd-party consultant report that highlights, promotes each jurisdictional effort, measured against CPP and individual Comprehensive Plan. I don't know how else to enforce jurisdictional performance other than to report our on jurisdictional progress. Perhaps it would be an Affordable Housing Report Card, not just data on a dashboard, but a performance measure to what jurisdiction said they would do.</p>
20	H-26 CM Jennifer Robertson, City of Bellevue	<p><u>H-256 Review and amend countywide and local housing strategies and actions when monitoring in Policy H-24 and H-25 indicates that adopted strategies are not resulting in adequate affordable housing to meet the countywide need with the recognition of unique characteristics within jurisdictions in addressing housing affordability. Consider amendments to land use policies and the land use map where they present a significant barrier to the equitable distribution of affordable housing.</u></p>	<p>The proposed changes to Policies H-24, H-25 and H-26 are being recommended by the city of Bellevue with the intent of ensuring that the data collection, monitoring and analysis of housing data across jurisdictions results in data that is consistent. The proposed language also provides for collaboration with regional data collection efforts so that significant burden is not placed on individual jurisdictions to fulfill the data collection and monitoring requirements.</p>