

Memo

To: King County Affordable Housing Committee Members
From: McCaela Daffern, Regional Affordable Housing Implementation Manager and Melissa Aguilar, Regional Affordable Housing Specialist
cc: Housing Interjurisdictional Team
Date: May 13, 2022
Re: GMPC Motion 21-1 Revised Accountability Framework

Purpose of May AHC Meeting

At the April 8 Affordable Housing Committee (AHC or Committee) meeting, Committee members reviewed actions for potential inclusion in the accountability framework for equitably meeting King County affordable housing needs. Members also requested additional information on each proposed action. The Growth Management Planning Council (GMPC) was consulted on the framework on April 27. Table 1 documents AHC questions and a response to each request, followed by more detailed information. For convenience, Exhibit B, Table A includes summary feedback from the GMPC and AHC and Table B provides an updated version of the potential accountability framework actions reviewed by the AHC and GMPC in April.

At the May 18 meeting, the AHC will be asked to approve a revised framework, which could include any amended combination of these four actions. The Committee may also append conditions to their decision, such as requesting additional detail in the draft Countywide Planning Policy (CPP) amendment language codifying the framework. The CPP amendment language will be brought to the AHC for initial consideration in September and possible adoption in November. King County AHC staff (staff) may reserve time at the July AHC and GMPC meetings to seek further direction on any conditions set by the AHC in May.

Background

The 2021 amended King County CPP 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 are expected use the CPP Housing Chapter framework to guide the housing element of their comprehensive plans.

GMPC Motion 21-1 requires the AHC to recommend to the GMPC an accountability and implementation framework for equitably meeting affordable housing needs across King County by the end of 2022.¹

At the April 8, 2022 meeting, the AHC considered four accountability actions grouped under two types with the second action under each type being inclusive of the first action. Committee members

¹ GMPC Motion 21-1 is referenced in Section 3 on pages 2-3 of King County Council Ordinance 19384 [\[link\]](#).

expressed broad support for *Actions 1a, 2a, and 2b* and requested additional information on all four actions.

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 comprehensive plans for alignment with the CPP Housing Chapter and comments.

1b. Review and certify plans: After comprehensive 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 the dashboard using standardized benchmarks and housing data trends.

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.

At their April 27 meeting, the GMPC was briefed on the AHC's feedback on draft actions and provided input of their own. GMPC members who spoke generally supported developing *Actions 1a* and *2a*. There was no expressed support for *Action 1b*. GMPC members who spoke didn't oppose *Action 2b*, but a few members suggested implementing this action in a future comprehensive plan cycle. For individual GMPC member feedback, reference Exhibit B, Table A.

Table 1 on page 3 summarizes Committee member questions and a staff response detailed further in the section following the table.

Table 1: AHC Accountability Framework Questions and Summary Staff Response

| Action | AHC Question | Summary Staff Response |
|---|---|--|
| Overarching Question | | |
| All actions | 1. Are there ways to reduce resource intensity, particularly for small jurisdictions? | <ul style="list-style-type: none"> • Clear checklists and standards • Less stringent expectations for small jurisdictions related to requiring plan adjustments • Explore waiving annual reporting if there have been no meaningful policy/programmatic changes • Collect and disseminate example policies, codes, ordinances, and other implementation strategies |
| Type 1: Comprehensive Plan Adoption Oversight Actions | | |
| 1a. Plan Review | 2. What type of up-front assistance would be most helpful? | <ul style="list-style-type: none"> • Plan review checklist • Links to comprehensive plan language from other cities • Webinar on plan review standards |
| | 3. Can we ensure an objective and independent review of plans? | <ul style="list-style-type: none"> • PSRC reports they have not had a challenge here, but strong, clear standards will certainly help |
| | 4. What are the standards for reviewing plans? | <ul style="list-style-type: none"> • Standards will align with most of the policies in the CPP Housing Chapter • Standards will account for local context, conditions, and capacity |
| 1b. Plan Review & Certification | 5. What are the standards for certifying plans? | <ul style="list-style-type: none"> • Same as Plan Review |
| | 6. Is there time to develop effective goal metrics and a certification process for this comprehensive plan cycle? | <ul style="list-style-type: none"> • Establishing an effective process would be challenging given that plan updates have already begun |
| Type 2: Comprehensive Plan Adoption Implementation Oversight Actions | | |
| 2a: Monitor & Report | 7. What housing data should be collected and tracked annually? | <ul style="list-style-type: none"> • Descriptions of the types of data to be tracked are provided in this staff report • Specifics can be included in draft CPP amendment text for AHC consideration in September 2022 |
| | 8. How will jurisdictional comparisons be measured? | <ul style="list-style-type: none"> • Guidance to establish jurisdictional comparisons in 2023 or later can be included in a draft CPP amendment text for AHC consideration in September 2022 • This could be developed at any time, with the details to be settled after more time-sensitive framework elements are established |
| 2b: Monitor, Report, & Require Adjustments | 9. What constitutes a significant shortfall and what reasonable measures would a jurisdiction be asked to take? | <ul style="list-style-type: none"> • Use CPP policy text to define collaborative process to establish this no sooner than 2024 |

Staff Response

Overarching Question

- **Q1: Are there ways to reduce resource intensity, particularly for small jurisdictions?**
 - Staff identified several ways to reduce resource intensity in response to member concerns over the resource intensity of the framework, especially for smaller jurisdictions:
 - clear checklists and standards;
 - less stringent expectations for small jurisdictions related to requiring plan adjustments;
 - explore waiving annual reporting if there have been no meaningful changes; and
 - collect and disseminate example policies, codes, ordinances, and other implementation strategies.

Type 1: Comprehensive Plan Adoption Oversight Actions

At the April meeting, the AHC considered two actions to increase oversight of comprehensive plan adoption in King County with a focus on ensuring comprehensive plans align with the CPP Housing Chapter, summarized below and detailed in Exhibit B.

| <i>Type 1 Actions: Comprehensive Plan Adoption Oversight</i> | |
|--|--|
| Action 1a: Review Plans AHC offers early guidance and assistance to jurisdictions on CPP Housing Chapter alignment. Before adoption of a periodic update to a comprehensive plan, the AHC reviews plans for alignment with the CPP Housing Chapter and comments. | Action 1b: Review & Certify Plans Everything in <i>Action 1a</i> plus, after plan adoption, GMPC issues plan certification decision. |

The following information is offered to inform the Committee’s selection of a method to increase oversight of the comprehensive plan adoption process.

- **Q2: What type of up-front assistance would be most helpful?**
 - Technical assistance and capacity building support that helps jurisdictional staff understand the new plan review process and easily access plan language from peer jurisdictions would have the most impact during plan development. Examples include:
 - a clear plan review and certification checklist provided as early in 2023 as possible;
 - a webinar to help orient staff to the process and checklist; and
 - links to relevant comprehensive plan language from other cities
- **Q3: Can we ensure an objective and independent review of plans?**
 - The development of strong, clear standards will help minimize biases and encourage objective plan review.
 - Staff from PSRC, a membership organization composed of governmental and quasi-governmental entities with its own comprehensive plan review and certification process, report that there have never been issues related to plan review objectivity.
- **Q4: What are the standards for reviewing plans?**

- Staff could develop a comprehensive plan review (and certification, if adopted) checklist that articulates a clear threshold for determining alignment between a comprehensive plan and each of the CPP Housing Chapter policies and guidance on meeting each threshold.
 - This threshold could serve as the basis for any plan review comments provided by the AHC to jurisdictions before comprehensive plan adoption and for any certification recommendation by the AHC and decision by the GMPC.
 - Additional threshold standards could be articulated for jurisdictions with unique conditions (e.g., access to planned or existing high capacity and frequent transit).
 - In addition to the threshold requirement, the checklist could include:
 - A request to provide a comprehensive plan page or a policy number showing where each threshold is met.
 - Guidance for meeting the threshold standard that jurisdictional staff can use or adapt based on local context, conditions, and capacity. If a jurisdiction deviates from the guidance, it would be up to them to determine and justify how they meet the threshold standard.
 - Suggestions to help jurisdictions go beyond the threshold standards to strengthen the affordable housing components of their plans. While jurisdictions are strongly encouraged to address these suggestions, doing so is not required or expected.
 - The checklist would likely articulate threshold standards for each of the 26 policies in the CPP Housing Chapter.
 - This checklist could be structured as a binary, yes/no list of questions, but staff can also explore with the HIJT CPP Work Group and the IJT whether to propose a check-the-box approach or a more nuanced approach to determine how well a jurisdiction implemented the standard.
 - Exhibit A illustrates how a threshold standard and guidance could be structured, using guidance from the adopted 2021 CPP Housing Technical Appendix. This illustration has not been reviewed by the HIJT CPP Work Group or IJT. Staff would further develop the structure and intent of the checklist in collaboration with PSRC, Commerce, the Housing Interjurisdictional Team CPP Work Group, and IJT to ensure the threshold standards are feasible, ensure the guidance is clear, and to leverage existing plan review processes to reduce duplicative review requirements.
 - If the AHC chooses to pursue *Actions 1a: Plan Review* or *Action 1b: Plan Review and Certification*, the AHC can request more sample checklist standards or a complete checklist (if feasible) to inform the AHC's discussion of draft CPP amendments in September 2022.
- **Q5: What are the standards for certifying plans?**
- The threshold standards for certifying plans would be the same ones used for plan review.
- **Q6: Is there time to develop effective goal metrics and a certification process for this comprehensive plan cycle?**
- There may not be time to establish and execute an effective certification process for this comprehensive plan cycle, given that comprehensive plan updates have already begun.
 - Waiting may help clarify the need for and benefit of this additional accountability step.
 - Some factors to consider include:
 - Jurisdictions may feel uneasy subjecting themselves or others to a certification decision without deeper knowledge of the certification standards, so significant

Committee time would be needed to design an effective process that the Committee supports. This would necessitate additional AHC meetings in 2022 or 203.

- It may be more beneficial for jurisdictions to test out and refine plan review standards first before adding in a controversial and time-consuming element like certification.
- It would require more planning, subregional collaboration, IJT member, HIJT CPP Group member, and AHC staff capacity and resources that would be difficult to secure in this comprehensive plan cycle.

Type 2: Comprehensive Plan Adoption Implementation Oversight Actions

At the April meeting, the AHC considered two actions to increase oversight of comprehensive plan implementation in King County with a focus on ensuring implementation occurs and in a manner aligned with the CPP Housing Chapter, summarized below and detailed in Exhibit B.

| <i>Type 2: Comprehensive Plan Adoption Implementation Oversight Actions</i> | |
|---|---|
| Action 2a: Monitor & Report | Action 2b: Monitor, Report, and Require Adjustments |
| After periodic updates to comprehensive plans are adopted, AHC annually measures jurisdictional progress to plan for and accommodate affordable housing targets in dashboard using standardized benchmarks and housing data trends. | Everything in <i>Action 2a</i> 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. |

The following information is offered to inform the Committee’s selection of a method to increase oversight of the comprehensive plan implementation.

- **Q7. What housing data should be collected and tracked annually?**
 - Staff could work with the HIJT CPP Work Group and IJT to refine standardized benchmarks and housing data trends to monitor and incorporate it into draft CPP amendment text for AHC consideration in September 2022.
 - The benchmarks and housing data trends will be carefully selected to ensure they:
 - can be used to evaluate if a jurisdiction is making progress to plan for and accommodate their targets and is implementing their comprehensive plan in manner consistent with the CPP Housing Chapter; and
 - are developed in collaboration with entities like PSRC, Commerce and the HIJT CPP Work Group to ensure data collection requirements are feasible and leverage existing regional and jurisdictional reports and monitoring tools to reduce duplicative reporting.
 - Annual monitoring will seek to measure outputs and, where feasible, outcomes, to better understand the housing affordability landscape in the county and whether jurisdictional efforts are having the intended effect. For example:

- The CPPs include policies that seek to increase the stability of renters.
 - To align with these policies, a jurisdiction commits to implementing tenant protection policies in their comprehensive plan.
 - Staff might recommend tracking if the jurisdiction implemented any new policies or strategies that increase protect housing stability for renter households and the use a measure like the annual percent change in the rate of evictions as a measure of effect.
- Due to the complex nature of different policy interventions to address housing affordability, it's likely that only a few outcomes will be measured, based on countywide capacity to provide the data and support assessment needs.
 - Annual monitoring may also include measures to assess progress to achieve the overarching CPP policy goals to plan for and accommodate countywide need and eliminate racial and economic disparities in access to housing and neighborhoods of choice. For example, tracking:
 - outputs such as land use or regulatory changes to increase zoned residential capacity, the number by type of residential building permits issued, capital, operations, and maintenance funding allocated for affordable housing; and income-restricted unit production; and
 - outcomes such as increases in affordable housing in areas with less affordable housing than the average jurisdiction and reduction in the percent share of low-income cost burdened households that are Black, Indigenous, or people of color.
- **Q8. How will jurisdictional comparisons be measured?**
- Staff could draft a CPP amendment that directs the AHC to include a comparative standard in the Regional Affordable Housing Dashboard but doesn't specify how or when this comparison will be executed.
 - The AHC could then have the flexibility to develop jurisdictional comparisons in 2023 or later.
- **Q9. What constitutes a significant shortfall and what reasonable measures would a jurisdiction be asked to take?**
- Staff could draft a CPP amendment establishing a collaborative process to define significant shortfalls and reasonable measures once the majority of the work to update comprehensive plans and review/certify them is well underway or complete, no sooner than 2024.
 - What constitutes a significant shortfall in planning for and accommodating affordable housing targets and what reasonable measures jurisdictions would be required to address these shortfalls will be easier defined once adequate plan review standards and jurisdictional data to track annual progress are identified.
 - More time and broad collaboration with stakeholders is needed to establish adequate definitions and processes.

Exhibit A: Sample Checklist Standard and Guidance

Threshold standard

CPP H-18: Include policies in your comprehensive plan and propose changes to zoning and development regulations that 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:

1. Providing access to affordable housing to rent and own throughout the jurisdiction, with a focus on areas of high opportunity
2. 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 (UGA), and capacity for high-density housing, where appropriate, consistent with the Regional Growth Strategy
3. Evaluating the feasibility of, and implementing, where appropriate, inclusionary and incentive zoning to provide affordable housing
4. 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.

Documentation

List the comprehensive plan page/policy and zoning and development regulation code references:

- Item 1: _____
- Item 2: _____
- Item 3: _____
- Item 4: _____

Guidance in meeting this standard

To get started on evaluating and implementing inclusionary and incentive zoning (item 3), review:

- MSRC's linked sample in-state regulations requiring provision of affordable housing on [their website](#).
- PSRC's Housing Innovations Program factsheets on [Inclusionary Zoning](#) and [Incentive Zoning](#).

Inclusive planning tools and policies to consider that increase neighborhood choice and satisfy items 1, 2, or 4 in the threshold standard include:

| Tools/Policies | Item 1 <i>Provides access to affordable housing to rent and own throughout the jurisdiction...</i> | Item 2 <i>Expands capacity for moderate-density housing throughout the jurisdiction...</i> | Item 4 <i>Provides access to housing types that serve a range of household sizes, types, and incomes...</i> |
|--|--|--|---|
| 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 | X | X | X |
| Plan for complete neighborhoods around existing and planned essential services throughout a jurisdiction | X | X | X |
| Establish a designation that allows more housing types within single-family zoned areas near parks, schools, and other services | X | X | X |

| Tools/Policies | Item 1 <i>Provides access to affordable housing to rent and own throughout the jurisdiction...</i> | Item 2 <i>Expands capacity for moderate-density housing throughout the jurisdiction...</i> | Item 4 <i>Provides access to housing types that serve a range of household sizes, types, and incomes...</i> |
|--|--|--|---|
| Allow housing types that are compatible in scale with existing housing | | X | |
| Revise parking regulations to prioritize housing and public space for people over space to park cars | X | | |
| Allow conversion of existing houses into multiple units | | X | X |
| Allow additional units on corner lots, lots along alleys and arterials, and lots on zone edges | | X | X |
| Incentivize retention of existing houses by making development standards more flexible when additional units are added | | | X |
| Provide technical and design resources for landowners and communities to redevelop and maintain ownership | X | | |
| Reduce or remove minimum lot size requirements | | X | X |
| Create incentives for building more than one unit on larger than average lots | | X | X |
| Limit the size of new single-unit structures, especially on larger than average lots | | X | X |
| Retain and increase family-sized and family-friendly housing | | | X |
| Remove the occupancy limit for unrelated persons in single-family zones, if applicable | | | X |

Exhibit B: Potential Accountability Framework Actions

Table A and Table B largely include the same information presented at the April AHC meeting and in the April AHC GMPC Motion 21-1 Draft Accountability Framework Staff Report. Where possible, staff incorporated clarifying edits and added detail to the accountability framework actions. New text is shown in underlined green text, proposed deletions are shown in ~~struck through green text~~, and unchanged text is black.

Table A. Summary of Potential Accountability Framework Actions

| Action | <u>Type 1 Actions: Comprehensive Plan Adoption Oversight</u> | | <u>Type 2 Actions: Comprehensive Plan Implementation Oversight</u> | |
|-----------------------------|---|---|--|---|
| | 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 comp plan, the AHC reviews plans for alignment with the CPP Housing Chapter and comments. | Everything in <i>Action 1a</i> plus, after plan adoption, GMPC issues plan certification decision. | After periodic updates to comp plans are adopted, AHC annually measures jurisdictional progress to plan for and accommodate affordable housing targets in dashboard using standardized benchmarks and housing data trends. | Everything in <i>Action 2a</i> 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; Establish adequacy standards and reasonable measures process no earlier than 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 and establish jurisdictional comparison standards no earlier than 2023 Challenge in establishing 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 establishing clear standards for adequacy/ inadequacy |
| AHC Feedback | AHC supports offering early guidance and assistance to jurisdictions during the | AHC needs more information to determine support for | AHC supports modifying the annual monitoring system to measure benchmark and | AHC supports a midcycle review of jurisdictional progress to accommodate their affordable housing targets and |

| | | | | |
|----------------------|--|---|---|---|
| | development of a periodic update to a comp plan and reviewing draft plans and providing comments prior to adoption. | recommending empowering the GMPC, with assistance from the AHC, to issue plan certification decisions. | data that more closely align with this framework, and comparing jurisdictions based on their progress toward benchmarks. | recommending empowering the GMPC, with assistance from the AHC, to require adjustments to address shortfalls. |
| GMPC Feedback | GMPC members who spoke generally support developing this action. | No expressed GMPC support for this action. | GMPC members who spoke generally support developing this action. Individual feedback: <ul style="list-style-type: none"> • Jurisdictional comparisons are necessary for measuring success. Smaller jurisdictions could have different standards. • Consider 2-3 year reporting cycle. • Consider how funding contributions to build units in other jurisdictions will be accounted for. | GMPC members who spoke didn't oppose this action, but a few members suggested implementing this action in a future comp plan cycle. |
| AHC Questions | <ol style="list-style-type: none"> 1. <i>Common question:</i> Are there ways to reduce resource intensity, particularly for small jurisdictions? 2. What type of up-front assistance would be most helpful? 3. What are the standards for reviewing plans? 4. Can we ensure an independent and objective review? | <ol style="list-style-type: none"> 5. What are the standards for certifying plans? 6. Is there time to develop effective goal metrics and a certification process for this comp plan cycle? | <ol style="list-style-type: none"> 7. What housing data should be collected and tracked annually? 8. How should jurisdictional progress be measured and displayed in the dashboard? | <ol style="list-style-type: none"> 9. What constitutes a significant shortfall and what reasonable measures would a jurisdiction be asked to take? |

Table B. Detailed Overview of Potential Accountability Framework Actions

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.
- 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, 20²

Roles

- County AHC staff work with PSRC and Commerce to identify opportunities to align guidance, review standards, and processes.
- AHC ~~recommends in 2022 and GMPC~~ establishes ~~in 2023~~ plan review standards, ~~Once the GMPC establishes the standards, the AHC~~ 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. ~~Deadline for plan adoption is December 31, 2024.~~
- ~~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.~~
- ~~e.~~ County AHC staff review draft ~~housing-related provisions of a comprehensive plan housing elements~~ and prepare comment letters for AHC issuance. Comments focus on areas of ~~strength and~~ additional work needed to align with CPP Housing Chapter before the plan is finalized and adopted.³
- ~~f.~~ ~~AHC issues comment letter on draft comprehensive plan before planned adoption.~~
- ~~g.~~ Jurisdictions with adopted ~~comprehensive plans housing elements~~ that remain inconsistent with the CPPs ~~Housing Chapter~~ 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 1b2, Review and 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.

² For all references to GMPC Major Amendments, see Appendix B in April 1, 2022 GMPC Motion 21-1 Draft Accountability Framework AHC staff report Framework [\[link\]](#).

³ If AHC also selects plan certification, this communication would reference the standard for certification [and potential certification issues](#) 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

Roles

- a. AHC conducts plan review process outlined in *Action 1a: Review Plans* except for *Step ed*. 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 periodic 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

AHC Impact

- AHC will spend a lot of meeting time in 2025 and early 2026 and every ten years thereafter reviewing and approving certification recommendations.

Staff Impact

- 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.

Tensions

- 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.
-

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

Roles

- a. ~~AHC recommends and GMPC approves a CPP amendment to revise the County AHC staff, in consultation with the IJT/HIJT, determine what~~ housing data trends and performance benchmarks that 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. Jurisdictional comparison format will be approved by the AHC no earlier than 2023.
- 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.
-

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

Roles

- a. The AHC conducts the activities in *Action 2a: Monitor and Report*.
- b. AHC recommends and GMPC approves a CPP amendment 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.
- c. ~~b. AHC develops and GMPC approves 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 and reasonable measures process no earlier than 2024.
- d. ~~e.~~ County AHC staff work with Commerce to identify opportunities to align implementation progress report standards and processes.⁴
- e. ~~d.~~ County AHC/GMPC staff, in consultation with the IJT/HIJT, work with jurisdictional staff to compile a 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 five years after a comprehensive plan is adopted.
- f. ~~e.~~ AHC issues a recommended determination of ~~determines~~ whether a jurisdiction's efforts to plan for and accommodate their targets was adequate.
- g. ~~f. GMPC AHC~~ issues determinations of adequacy.
- h. ~~g.~~ Jurisdictions that do not demonstrate adequate progress must work with AHC and GMPC to explain their shortfall and propose to the GMPC and/or take reasonable measures it will take steps to address inadequacies. GMPC can either concur with those reasonable measures or require different reasonable measures.
- i. Jurisdictions that do not take reasonable measures to address inadequacies assume the risk of a potential legal challenge.

Considerations

- AHC Impact • AHC and GMPC will spend a lot of meeting time sometime between 2024 and 2028 developing and approving mid-cycle analysis adequacy standards and reasonable measures process.

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, the jurisdiction must adopt to create a work plan to implement any necessary regulations, zoning, and land use changes, or take other legislative or administrative action and complete all implementation work 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](#)].

- AHC and GMPC will spend a lot of meeting time in 2029/2030 and every ten years thereafter reviewing assessments and determining adequacy.
- Staff Impact*
- Jurisdictional, AHC County, HIJT/IJT, ARCH, and SKHHP staff will spend a lot of time sometime between 2024 and 2028 developing and approving adequacy standards and reasonable measures process.
 - 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.
- 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 sing standards for adequacy/ inadequacy.
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