

Memo

To: King County Affordable Housing Committee Members
From: Carson Hartmann, Regional Affordable Housing Planner
cc: Housing Interjurisdictional Team
Date: October 28, 2022
re: King County Affordable Housing Committee Housing-Focused Comprehensive Plan Review Standards and Plan Certification Pilot

Purpose of November 3 AHC Meeting

At the November 3 Affordable Housing Committee (AHC or Committee) meeting, members will learn about and **provide input on the draft recommended comprehensive plan review standards and process**. This input will be incorporated into a final draft for Committee consideration and possible approval at their December 9 meeting. If approved, the recommended standards and process will be included in the AHC's recommendation to the Growth Management Planning Council (GMPC) at the end of this year.

AHC staff will also brief the Committee on which cities expressed interest in joining the comprehensive plan certification. Members will then confirm if the pilot should be included in the AHC's final draft recommendation based on the interest expressed.

Background

In June 2021, through Motion 21-1, the GMPC directed the Committee to recommend an accountability and implementation framework for equitably meeting affordable housing needs across King County by the end of 2022. In May 2022, the Committee directed AHC staff to develop a three-part recommended accountability framework in response to this motion, a central component of which is jurisdictional participation in a housing-focused review of draft comprehensive plans by the AHC. Under AHC directive, staff designed and developed a comprehensive plan review process and set of comprehensive plan review standards from May to September.

Throughout the design process, staff followed key principles that comprehensive plan review will:

1. have a substantive effect on comprehensive planning in King County, such that housing elements clearly plan for and accommodate countywide housing need and align with the Housing Chapter of the Countywide Planning Policies (CPPs);
2. be achievable by the jurisdictional staff preparing the submission and AHC staff performing the review;
3. have simple and easy to understand standards;
4. complement and fill gaps in Puget Sound Regional Council (PSRC) and State reviews of housing elements; and
5. give jurisdictions ample time to communicate with AHC staff throughout plan review process and to meaningfully respond to plan review feedback ("no surprises").

During the design process, it also became clear that comprehensive plan review standards would need to tread the line between setting objective standards for plans across all jurisdictions and housing policies and allowing jurisdictions the flexibility to adapt plans to local conditions and to set their own goals.

Staff distributed two drafts of comprehensive plan review standards to the Interjurisdictional Team, Housing Interjurisdictional Team (HIJT), and HIJT CPP Work Group in September and October of 2022.

Draft Comprehensive Plan Review Standards and Process

Responsive to AHC directives and feedback from stakeholder groups, AHC staff recommend the following standards, process, and timeline for comprehensive plan review. See the Appendix for a complete description of the standards and process, as well as supplementary materials meant to assist jurisdictions in preparation for review.

Comprehensive Plan Review Standards

Three standards scaffold AHC review of comprehensive plans:

1. **A Check for Completeness:** Plans contain responses to all CPP Housing Chapter policies and address all unique requirements of the housing-related CPPs when compared to the GMA and VISION 2050. Refer to Table 1 on page 14 of the Appendix for details on unique aspects.
2. **Implementation Strategies:** A majority of the CPP Housing Chapter policies request the jurisdictions implement or adopt policies.¹ This standard asks jurisdictions to include implementation strategies in their comprehensive plans for goals and policies that address these specific CPPs.² Strategies in this sense refer to: 1) regulatory and nonregulatory measures that should be adopted to implement the policies of the comprehensive plan and 2) the adoption schedule for these measures. Page 12 of the Appendix includes a description and example of the implementation details that this standard requests.
3. **Meaningful Plans:** The plan lays out meaningful policies in addressing all the Housing Chapter CPPs that, taken together, support the jurisdiction's ability to equitably meet housing need. Meaningful policies in this sense are designed and can be reasonably expected to achieve a material, positive change in the jurisdiction's ability to meet housing need.³

In addition to the standards themselves, staff have developed supplementary materials to aid planners in their preparation of plans for review. These materials, along with a primer on the comprehensive plan review process, can be found in the Appendix.

¹ Policies requiring implementation or adoption in the [CPPs](#): 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.

² Requests for implementation strategies for plan goals and policies is consistent with the Washington Administrative Code (WAC) 365-196 650 [\[link\]](#).

³ The incorporation of a "meaningfulness" standard came in response to stakeholder feedback and staff recognition that standards should set a bar for quality, while also preserving the ability of jurisdictions to craft plans that respond to local circumstances. A similar standard is set by the Department of Housing and Urban Development in reviews of local assessments of fair housings' alignment with the Affirmatively Furthering Fair Housing rule ([24 C.F.R. § 5.152](#)). This meaningfulness standard originates from case law, specifically from use by the US Supreme Court in civil rights cases.

The Comprehensive Plan Review Process

The recommended housing-focused comprehensive plan review process will include technical assistance, AHC staff review, and jurisdictional revisions. Figure 1 summarizes this process.

Dec 31st '24

Figure 1. Plan Review Process and Example Timeline

Plan Adoption
Deadline

Early 2024		June '24	Aug '24	60 days before planned adoption
End of CPP Ratification Process / Plan Review Adopted		Jurisdiction Releases Public Review Draft	AHC Issues Comment Letter	State Draft Submission Deadline
		~60 days		
TECHNICAL ASSISTANCE		REVIEW		REVISION
<ul style="list-style-type: none"> + AHC staff develop and provide technical assistance in the form of written materials and webinars 	<ul style="list-style-type: none"> + AHC staff invite jurisdictions for pre-submission meetings + Jurisdictional staff consult online technical materials and AHC staff to craft plans + Jurisdictional staff submit an early draft to AHC staff for comprehensive plan review 	<ul style="list-style-type: none"> + AHC staff confirm that: <ul style="list-style-type: none"> - Plan is complete - Plan includes implementation details - Plan is meaningful + AHC staff compile comments into draft letter + Chair reviews draft letters, identifying those eligible for a consent agenda and those that will be pulled for discussion + AHC receive all plans and provides consultation on plans pulled for discussion by staff, the chair, and other AHC members. + AHC staff communicate with jurisdiction throughout process and in case of major concerns 	<ul style="list-style-type: none"> + Jurisdictional staff respond to AHC reviews and suggestions + AHC staff available for consultation and to clarify any feedback provided 	

Technical Assistance

The GMPC will consider and possibly recommend the adoption of the AHC’s comprehensive plan review process and standards to the King County Council (Council) in mid-2023. The Council will then consider adoption and King County cities will ratify the comprehensive plan review process in late 2023, followed by a 90-day city ratification period, projected to conclude in the first quarter of 2024. Prior to ratification of the comprehensive plan review process and standards, AHC staff will develop technical assistance materials and conduct webinars to inform jurisdictions about the details of the new comprehensive plan review process and potential strategies for addressing CPPs and plan review standards. Upon ratification, AHC staff will offer to meet with jurisdictions to provide guidance for aligning plan elements with the comprehensive plan review standards and housing related CPPs.

Submission

Materials for submission include a draft comprehensive plan and a completed checklist (see Appendix page 11). Drafts plans and the checklist will be emailed directly to AHC staff.

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. This gives the jurisdiction ample time to compile plan review materials and the AHC ample time to respond to feedback. It also allows the comprehensive plan review process to occur well in advance of reviews conducted by PSRC and State agencies.

A benefit of reviewing early drafts of plans is that plan submissions will be staggered throughout 2024. This provides AHC staff with a more realistic timeline for plan review completion. Staff will conduct additional outreach to jurisdictions throughout 2023 and 2024 to confirm schedules for draft submissions and set a timeline for AHC review.

AHC Staff Review and Letter Issuance

Once a jurisdiction submits a plan to the AHC, the review process will work as follows:

1. AHC staff review the draft plan and supplementary materials using comprehensive plan review standards and identify possible areas of concern or confusion.
2. AHC staff offer to meet with jurisdictional staff to clarify any points of confusion or concern before drafting comments on the plan.
3. Staff draft letters and meet with the AHC Chair and Vice Chair, who identify which letters will be placed on the consent agenda and those that will be pulled for discussion. If pulled for discussion, AHC staff will inform the jurisdictional staff and share the draft comment letter with the jurisdiction before circulation the AHC.
4. The AHC receives all letters and meets to discuss those pulled for discussion. Members can pull letters on the consent agenda for discussion in the case of concerns or questions. Committee determines the content of and authorizes issuance of each letter.
5. The Chair or the Chair's designee emails final comment letters to the jurisdictional staff.

Plan review comment letters will:

- Confirm the completeness of comprehensive plans (see Standards 1 and 2 on page 3).
- Provide an assessment of the plan and how plan elements advance CPP Housing Chapter goals (see Standard 3 on page 3).
- Highlight areas needing improvement and areas of outstanding effort.

Revision

Once letters are issued, jurisdictions will have an opportunity to revise their comprehensive plans to address AHC comments. Jurisdictions may schedule meetings with AHC staff to discuss comprehensive plan review letters after their release date; however, jurisdictions are highly encouraged to meet with AHC staff as much as possible prior to letter release. Revisions in response to staff comments are not followed by additional AHC review.

Plan Certification Pilot

In May 2022, the AHC recommended a housing-focused comprehensive plan certification pilot program to increase the likelihood that jurisdictions will address plan review comments. Under this pilot, the GMPC would issue housing-focused comprehensive plan certification decisions for a small subset of volunteer jurisdictions that choose to participate after their comprehensive plans are adopted.

The GMPC and the AHC would conduct the pilot between 2023 and 2025 and use the process to understand how a certification process might work in practice and to gauge whether plan certification produced more impactful results than plan review alone. It also provides an opportunity to learn from and refine methods before more jurisdictions participate, informs whether the pilot can or should be scaled up, and reduces the number of plans being certified at one time.

Participating jurisdictions would have the option to join a learning cohort to help inform the pilot and provide interjurisdictional connections and mutual support. Jurisdictions would also be eligible for extra technical assistance from King County AHC staff.

To ensure sufficient pilot participation, staff recommend the AHC confirm a cohort of approximately five pilot cities before the AHC’s final vote to recommend an accountability framework. Jurisdictions with varying levels of staff capacity throughout both various parts of 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 King County.

In August of 2022, the AHC, in coordination with the HIJT, finalized and released a call for pilot volunteers. The deadline to express interest in joining the pilot is October 31, 2022. As of October 28, three cities collectively representing cities in the Snoqualmie Valley and East King County expressed interest.

City	Characteristics
Snoqualmie	<ul style="list-style-type: none"> Population: Small-Medium (14,490 people) Location: Snoqualmie Valley Regional Geography: Cities and Towns Perspective: Will help the AHC design a pilot that works for small cities with small planning departments and infrastructure challenges
Redmond	<ul style="list-style-type: none"> Population: Medium-High population (75,270 people) Location: East King County Regional Geography: Core City Perspective: Will help the AHC design a pilot that works for higher cost cities and cities taking proactive steps to plan for more affordability
Kirkland	<ul style="list-style-type: none"> Population: Medium-High population (93,570 people) Location: East King County Regional Geography: Core City Perspective: Will help the AHC design a pilot that works for higher cost cities and cities taking proactive steps to plan for more affordability

Next Steps

Phase	Steps
<p>November-December 2022 <i>AHC completes and transmits their response to GMPC Motion 21-1</i></p>	<ul style="list-style-type: none"> • At the November 3 AHC meeting, members will be asked to confirm if the pilot should be included in the AHC’s final recommendation to the GMPC based on the expressed interest. • Committee members will also be asked to approve the direction of the comprehensive plan review standard and process. Following the meeting, staff will respond to AHC feedback and incorporate the necessary elements of the proposed comprehensive plan review process and standards into a draft recommendation statement to the GMPC for AHC potential adoption on December 9.
<p>January-July 2023 <i>GMPC reviews and approves and transmits recommended CPP amendments to King County Council</i></p>	<ul style="list-style-type: none"> • The GMPC will consider the AHC’s recommendation, including the recommended plan review standards, process, and timeline in early-to-mid-2023. The GMPC will also consider and potentially vote to approve the plan review standards and accompanying CPP amendments that establish plan review authority on the same timeline. • AHC staff will provide comprehensive plan review technical assistance following GMPC approval.
<p>August 2023-March 2024 <i>King County considers and approves CPP amendments and cities ratify</i></p>	<ul style="list-style-type: none"> • Upon GMPC consideration and approval, the King County Council will consider CPP amendments establishing plan review authority in late 2023, followed by city ratification in the first quarter of 2024. • Plan review standards will be effective upon city ratification establishing plan review authority, but King County Council will not review or approve the standards themselves. Jurisdictions looking to start the comprehensive plan review process before ratification may do so with the knowledge that plan review authority is forthcoming.

APPENDIX. KING COUNTY AFFORDABLE HOUSING COMMITTEE HOUSING-FOCUSED COMPREHENSIVE PLAN REVIEW PRIMER

This primer describes proposed King County Affordable Housing Committee's (AHC or Committee) housing-focused comprehensive plan review standards and plan review process. If recommended by the Committee and approved by the Growth Management Planning Council's (GMPC), the AHC and AHC staff will use the standards outlined in this document to review draft periodic updates to comprehensive plans for alignment with King County Countywide Planning Policies (CPP) Housing Chapter. The AHC will then submit written feedback from this review to a jurisdiction prior to adoption of their comprehensive plan periodic update in efforts to align local plans with CPPs goals and policies and improve a jurisdiction's ability to plan for and accommodate their housing needs.

BACKGROUND

Comprehensive plans guide local efforts to meet the diverse housing needs of current and future residents. King County and the 39 cities in King County are responsible for updating comprehensive plans every ten years in a manner that's coordinated and consistent with State, region, and countywide goals. The Washington State Growth Management Act (GMA) establishes a framework for housing planning across the state, while the Puget Sound Regional Council's (PSRC) VISION 2050 sets Multicounty Planning Policies (MPPs) between King, Pierce, Snohomish, and Kitsap counties to align regional planning efforts, including housing goals. In King County, plans are additionally guided by the CPPs, developed by the County and cities through the GMPC. The AHC advises the GMPC on amendments to the CPP Housing Chapter.

Policies in the CPP Housing Chapter reflect a collaborative effort between King County governments to guide local planning such that, collectively, countywide housing needs are met, all residents have a choice in where they live, and race-, place-, ability- and income-based housing disparities are eliminated. Forthcoming CPP Housing Chapter amendments will, if adopted and ratified, establish a new accountability and implementation framework to support jurisdictions in meeting CPP Housing Chapter goals. Leading up to comprehensive plan adoption, the AHC will support King County jurisdictions in their efforts to prepare periodic updates to comprehensive plans and align plan goals, policies, and implementation strategies with the CPP Housing Chapter.

A central component of the new CPP Housing Chapter accountability and implementation framework is jurisdictional participation in a housing-focused review of draft comprehensive plans by the AHC. Over the course of 2022, the AHC developed CPP amendments establishing GMPC, or the AHC, as its designee, authority to conduct comprehensive plan review and the standards and materials to be used in the review process.⁴ Review standards, which can be found on page 10, were developed by AHC staff in consultation with local planning staff, from the CPP Housing Chapter using a set of key design principles that aim to make plan review:

- 1) substantively effective in increasing a jurisdiction's ability to meet housing goals and align with CPP Housing Chapter policies;
- 2) achievable for staff preparing the submission and AHC staff performing the review;

⁴ See Countywide Planning Policies, Housing Chapter, Policy H-26 [\[link\]](#)

- 3) simple and easy to understand;
- 4) complementary to PSRC and State reviews of plans; and
- 5) supportive and predictable in that jurisdictions are provided ample time and communications during the review process, to understand and respond to feedback.

Final comprehensive plan review supports jurisdictions in developing more effective plans by:

- establishing a system to confirm that all Housing Chapter CPPs are meaningfully⁵ addressed;
- establishing a new process that encourages articulation of how the plan's housing-related goals and policies will be implemented over the planning cycle, with respect to jurisdiction's preference to set their own policies and goals;
- highlighting the unique requirements of the CPP Housing Chapter as compared to the GMA and VISION 2050 and guiding jurisdictions in addressing these unique requirements; and
- offering comment on the draft comprehensive plan's alignment with and ability to advance CPP Housing Chapter goals in the jurisdiction.

This primer details the process and standards used by the AHC for comprehensive plan review. It also provides supplemental materials to assist jurisdictions as they prepare draft comprehensive plan updates and submit them to the AHC for review (Checklist A, Table 1). This includes an analysis of key differences between the GMA, VISION 2050, and CPP requirements to alert jurisdictions to crossovers between the GMA, the MPPs, and the CPPs, as well as the unique requirements of the CPP Housing Chapter (Table 1). The document also makes frequent reference to CPP Housing Chapter Appendix 4, which provides guidance on how to respond to individual CPPs, including example implementation strategies and methods of analysis.

COMPREHENSIVE PLAN REVIEW PROCESS

Technical Assistance

Prior to ratification of the comprehensive plan review process and standards AHC staff will reach out to jurisdictions to raise awareness of the plan review standards and answer questions. Staff will also develop technical assistance materials, offer webinars to inform jurisdictions about the details of the new comprehensive plan review process, and share best practices for addressing review standards. Upon ratification, AHC staff will offer to meet with jurisdictions to provide guidance for aligning plan elements with the comprehensive plan review standards and housing-related CPPs.

Submission

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. This gives jurisdictions and the AHC reviewers ample time to compile and/or respond to feedback. It also allows the comprehensive plan review process to occur well in advance of reviews conducted by PSRC and state agencies.

⁵ Meaningful plan policies are policies that can be reasonably expected to achieve a positive, material change sufficient to meet housing needs.

Material Submission

Materials for submission include a draft comprehensive plan and a completed Checklist A. Draft plans and the checklist can be emailed directly to Affordable Housing Committee staff.

AHC Staff Review and Letter Issuance

Plan review comment letters will:

- Confirm the completeness of comprehensive plans (see Standards 1 and 2 on page 10).
- Provide an assessment of the plan and how plan elements advance CPP Housing Chapter goals (see Standard 3 on page 10).
- Highlight areas needing improvement and areas of outstanding effort.

Plan review will begin upon jurisdictional submission of plans to AHC staff, using the following steps:

1. AHC staff review the draft plan and supplementary materials using comprehensive plan review standards and identify possible areas of concern or confusion.
2. AHC staff offer to meet with jurisdictional staff to clarify any points of confusion or concern before drafting comments on the plan.
3. Staff draft letters and meet with the AHC Chair and Vice Chair, who identify which letters will be placed on the consent agenda and those that will be pulled for discussion. If pulled for discussion, staff will inform the jurisdictional staff and share the draft comment letter with the jurisdiction before circulation the AHC.
4. The AHC receives all letters and meets to discuss those pulled for discussion. Members can pull letters on the consent agenda for discussion in the case of concerns or questions. Committee determines the content of and authorizes issuance of each letter.
5. The Chair or the Chair's designee emails final comment letters to the jurisdictional staff.

COMPREHENSIVE PLAN REVIEW STANDARDS

The AHC will consider a comprehensive plan consistent with the CPP Housing Chapter policies when the plan meets the following three standards.⁶

Standard	Instructions
<p>1. The policies and related appendices in the plan evidently address all CPP Housing Chapter policies. This includes the completion of all required analysis in H-4, H-5, H-6, and H-12 and the inclusion of all unique requirements of the CPP Housing Chapter, detailed in Table 1</p>	<p>Complete and submit Checklist A: CPP Housing Chapter Policies Crosswalk (see page 11).</p> <p>Use Table 1 to verify that unique aspects of the CPP Housing Chapter are addressed (pages 14-19).</p> <p>Refer to CPP Housing Chapter Technical Appendix 4 on pages 70-97 of the CPPs for guidance on responding to individual CPP Housing Chapter policies</p>
<p>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. Implementation strategies should identify:</p> <ol style="list-style-type: none"> the regulatory or non-regulatory measures to be used to implement goals and policies used to address CPP Housing Chapter policies; and an adoption schedule for measures (by year).⁷ 	<p>Note where implementation strategies can be found in the comprehensive plan when completing Checklist A (page 11).</p> <p>See page 12 for instructions on how to report implementation strategies.</p>
<p>3. The plan lays out meaningful policies that, taken together, support the jurisdiction’s ability to equitably meet housing need by promoting:</p> <ol style="list-style-type: none"> equitable processes and outcomes; increased housing supply, particularly for households with the greatest needs; expanded housing options and increased affordability accessible to transit and employment; expanded housing and neighborhood choice for all residents; housing stability, healthy homes, and healthy communities; and a commitment to continuous improvement through implementation, monitoring, and adjustment. 	<p>Submit a digital copy of your draft plan.</p> <p>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.⁸</p>

⁶ Policy numbers reference the CPPS as amended in 2021. AHC staff will update this with a new link and policy references the next time the CPP Housing Chapter are amended.

⁷ Request for regulatory and non-regulatory measures to implement comprehensive plans are supported by language in the Washington Administrative Code (WAC) 365-196 650 [\[link\]](#).

⁸ A meaningfulness standard has precedent at the Department of Housing and Urban Development in the enforcement of the Affirmatively Furthering Fair Housing rule (24 C.F.R. § 5.152), as well as in the US Supreme Court in civil rights cases. This plan review standard was designed to both set a bar for evaluation of local plans that is linked to the CPP Housing Chapter goals, while also to provide jurisdictions flexibility in how that bar is reached, based off analysis of local conditions.

Checklist A: CPP Housing Chapter Policies Crosswalk

Use this table to track coverage of housing-related CPPs in your plan as well as provide details on the location of implementation plans. Submit this table, filled out with appropriate information, along with your draft element.

CPP	ADDRESSED	Page or Policy #	Implementation Strategies Page #
H-1	<input type="radio"/>		
H-2	<input type="radio"/>		
H-3	<input type="radio"/>		
H-4	<input type="radio"/>		
H-5	<input type="radio"/>		
H-6	<input type="radio"/>		
H-7	<input type="radio"/>		
H-8	<input type="radio"/>		
H-9	<input type="radio"/>		
H-10	<input type="radio"/>		
H-11	<input type="radio"/>		
H-12	<input type="radio"/>		
H-13	<input type="radio"/>		
H-14	<input type="radio"/>		
H-15	<input type="radio"/>		
H-16	<input type="radio"/>		
H-17	<input type="radio"/>		
H-18	<input type="radio"/>		
H-19	<input type="radio"/>		
H-20	<input type="radio"/>		
H-21	<input type="radio"/>		
H-22	<input type="radio"/>		
H-23	<input type="radio"/>		
H-24	<input type="radio"/>		
H-25-27	<input type="radio"/>		

Implementation Strategies Instructions

A central focus of the CPP Housing Chapter is on the adoption and implementation of policies that advance CPP Housing Chapter goals and on monitoring progress to plan for and accommodate housing need. During the comprehensive plan review standards process, AHC reviewers will use standard 2 to ensure that comprehensive plans include implementation strategies for housing-related policies such that the AHC can review and monitor progress toward planning for and accommodating housing needs and other housing-related goals in the CPP Housing Chapter. For policies requiring implementation strategies, Checklist A leaves space for page numbers to direct reviewers to where implementation strategies can be found.

Following Washington Administrative Code 365-196 650, which requests that jurisdictions prepare a strategy for implementing adopted comprehensive plans, the AHC requests that jurisdictions prepare overarching goals and policies that align with the Housing Chapter CPPs and that they are accompanied by regulatory and non-regulatory measures meant to implement the policy and adoption schedules for chosen measures.

Regulatory measures mean regulations pertaining to development, tenure, and other housing related issues, such as the delineation of new use zones, general development limitations concerning lot size, setback, bulk, and height; affordable housing and/or inclusionary zoning requirements; tenant protections; or community preference policies. Non-regulatory measures mean actions to acquire and/or spend money in support of programs and activities, such as affordable homeownership; affordable housing preservation and development; tenant rights informational campaigns; community engagement efforts and advisory groups; policy research and development; or fair housing enforcement.

Jurisdictions have the choice in how to provide specific details to the AHC. Implementation strategies can be included directly in the text of a plan, as their own chapter, or as an element of the appendix. Implementation strategies may also be submitted separately from the main plan. Below is an example of one way these details could be organized.

Goal 4.7: Increase Housing Opportunities for All

Policy 4.7A: Maintain and enhance existing affordable housing stock

POLICY 4.7A. MEASURES	ADOPTION YEAR
4.7A1: Design and fund a program that matches homeowners who have extra space and/or maintenance or supplemental income with appropriate renters	2028
4.7A2: Launch tax abatement/incentive program for landlords providing rents affordable to households making between 50 percent and 80 percent of AMI	2026
4.7A3: Renew Housing Tax Levy prior to expiration in 2030 and add provisions that a percentage of total funding be allocated to preservation programs	2028

Policy 4.7B: Work to decrease disparities in homeownership by race and ethnicity

POLICY 4.7B. MEASURES	ADOPTION YEAR
4.7B1: Establish community preference policy requirement for low-income homeownership projects using jurisdictional funding	2026
4.7B2: Establish and promote property tax-abatement program for low-income homeowners	2028
4.7B3: Partner with culturally specific community organizations to promote property tax-abatement program and to develop strategies for supporting homeownership work going forward	2029

Importance of Implementation Strategies to Annual Monitoring

A key component of the AHC's proposed accountability framework is a commitment to the annual monitoring of jurisdictional progress towards planning for and accommodating housing needs and CPP housing chapter goals. Metrics for this monitoring process will derive from jurisdictional and county data reporting required in H-25. A key component of this monitoring process will be AHC tracking of implementation strategy adoption. By tracking which strategies have been adopted and which have not, the AHC can assess jurisdictional efforts made to advance plan (and thus CPP Housing Chapter) goals and compare efforts and progress across jurisdictions. An assessment of progress made on implementation strategies will also likely be a component of the midcycle review process, which will occur five years after plan adoption. The AHC has committed to designing this midcycle review process no earlier than 2024.

TABLE 1 UNIQUE CPP REQUIREMENTS

The housing-related CPPs are consistent with both the GMA and VISION 2050. As such, all three sets of policies require similar components from comprehensive plans. The CPPs, however, contain unique requirements for housing planning not covered in regional and state reviews. This table highlights unique CPP Housing Chapter requirements to ensure King County jurisdictions have the information they need to craft housing policies and plans that are consistent with countywide goals. While comprehensive plans will be considered in their completeness, the AHC will pay special attention to these specific aspects while conducting reviews and drafting comment letters. Guidance for how to respond to these unique requirements can be found in [Appendix 4 of the Housing Chapter](#).

REQUIREMENTS		
REQUIREMENT CATEOGRY	GMA and/or VISION 2050	CPPs
HOUSING NEEDS		
Special Consideration of Low-Income Households (H-2)	<p>GMA: Jurisdictions asked to plan for and accommodate housing need and apply special consideration to moderate-, low-, very low-, and extremely -income households (RCW 36.70A.020 (4) & 36.70A.070 (2)(a)(c)&(d))</p> <p>VISION 2050: Jurisdictions asked to address need for housing affordable to low- and very low-income households (MPP-H-4)</p>	Jurisdictions asked to prioritize housing needs for extremely low-income households (those making 0-30% of AMI) through suggested policy changes (see H-2)
ANALYSES		
Housing Inventory Analysis (H-4)	<p>GMA: Analysis inventories existing and future housing needs for moderate-, low-, very low-, and extremely low-income households as well as emergency housing, emergency shelters, and permanent supportive housing (RCW 36.70A.070 (2)(a)(i)&(ii))</p> <p>VISION 2050: Analysis inventories housing needs, stated broadly (MPP-H-Action-4)</p>	H-4 asks jurisdictions to analyze additional elements of need and existing housing units, the extent of which can be found in the policy H-4 text

<p>Evaluation of Housing Policy Effectiveness and Strategies and Identification of Gaps (H-5)</p>	<p>GMA: Requires documentation of programs and actions needed to achieve housing needs, including gaps in local funding (<i>RCW 36.70A.070 (2)(d)(ii)</i>)</p> <p>VISION 2050: Requires jurisdictions to evaluate effectiveness of local housing policies and strategies to achieve housing targets and affordability goals (<i>MPP-H-Action-4</i>)</p>	<p>H-5 requests additional information in the gaps analysis about:</p> <ul style="list-style-type: none"> • partners and policies to meet need • eliminating racial and other disparities in access to housing and neighborhoods of choice.”
<p>Documentation of Discriminatory Land Use Practices and Racially Disparate Impacts (H-6)</p>	<p>GMA: Requires the identification of local policies and regulations that result in disparate impacts, displacement, and exclusion in housing (<i>RCW 36.70A.070 (2)(e)(i-iii)</i>)</p> <p>VISION 2050: N/A</p>	<p>The CPPs require jurisdictions to:</p> <ol style="list-style-type: none"> a) document the history of discriminatory land use and housing practices in their plans; b) explain the extent to which that history is still reflected in current development patterns, housing conditions, tenure, and access to opportunity; c) identify local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing, including zoning that may have a discriminatory effect, disinvestment, and infrastructure availability; and d) demonstrate how current strategies are addressing impacts of those racially exclusive and discriminatory policies and practices. <p>In addition to guidance provided in Appendix 4 of the CPPs, refer to Dept. of Commerce guidance on addressing racially disparate impacts in planning to complete this analysis [link forthcoming once state guidance is released]</p>

EQUITABLE PROCESSES AND OUTCOMES

<p>Engage Those Most Disproportionately Impacted by Cost Burden (H-9)</p>	<p>GMA: Requires that jurisdictions engage the broader public in the development and implementation of comprehensive plans (<i>RCW 36.70A.140</i>)</p> <p>VISION 2050: Requires inclusive community planning to reduce disparities in access to opportunity (<i>MPP-DP-2</i>) and inclusive community engagement to identify diverse needs (<i>MPP-DP-8</i>)</p>	<ul style="list-style-type: none"> • CPP Policy H-9 specifies that jurisdictions should specifically engage populations <i>most disproportionately impacted by housing cost burden</i> in developing, implementing, and monitoring strategies that achieve CPP Housing Chapter goals. • H-9 also asks jurisdictions to prioritize the needs and solutions articulated by disproportionately impacted populations in the policy development process.
<p>Reparative Policies for Black, Indigenous, and People of Color Households (H-10)</p>	<p>GMA: Requires the identification and implementation of policies and regulations to address and begin to undo racially disparate impacts (<i>RCW 36.70A.070 (2)(f)</i>)</p> <p>VISION 2050: N/A</p>	<ul style="list-style-type: none"> • H-10 uniquely requires that jurisdictions adopt intentional, targeted actions that repair harms to Black, Indigenous, and other people of color households from past and current racially exclusive and discriminatory land use and housing practices (generally identified through Policy H-6). • H-10 requires that jurisdictions promote equitable outcomes in partnership with communities most impacted.

INCREASE HOUSING SUPPLY, PARTICULARLY FOR HOUSEHOLDS WITH THE GREATEST NEED		
<p>Strategies to Increase the Supply of Long-Term Income Restricted Housing (H-11 & H-14)</p>	<p>GMA: Requires that jurisdictions make adequate provisions to meet housing needs, including adjusting or creating new development regulations (<i>RCW 36.70A.070 (2)(d)</i>)</p> <p>VISION 2050: Requires a suite of policies to meet housing needs through the development and preservation of housing at different densities and equitably and rationally distributed including long-term affordable options (<i>MPP-H-2-6, H-9</i>)</p>	<p>CPPs H-11 and H-14 ask jurisdictions to take diverse action, through both policy and resource dedication, to specifically increase the supply of <i>income-restricted</i> housing.</p> <ul style="list-style-type: none"> • Policy H-11 asks jurisdictions to adopt policies, incentives, strategies, actions, and regulations that increase the supply of long-term income-restricted housing for extremely low-, very low-, and low-income households and households with special needs. • Policy H-14 asks for jurisdictions to prioritize the use of local and regional resources (e.g., funding, surplus property) for income-restricted housing, particularly for extremely low-income households, populations with special needs, and others with disproportionately greater housing needs. • The CPPs also ask jurisdictions to consider resourcing projects that promote access to opportunity, anti-displacement, and wealth building for Black, Indigenous, and People of Color communities to support implementation of policy H-10.
EXPANDED HOUSING OPTIONS AND INCREASED AFFORDABILITY ACCESSIBLE TO TRANSIT AND EMPLOYMENT		
<p>Increasing Housing Choice for Low-Wage Workers (H-15)</p>	<p>GMA: Requires adequate provisions to meet housing needs that include considerations of employment location (<i>RCW 36.70A.070 (2)(d)(iii)</i>)</p> <p>VISION 2050: Requires plans to develop and provide a range of housing choices for workers at all income levels that are accessible to job centers and affordable (<i>MPP-H-6</i>)</p>	<ul style="list-style-type: none"> • H-15 requires special considerations for <i>low-wage</i> workers co-located with, accessible to, or within a reasonable commute to major employment centers • H-15 requires jurisdictions ensure zoning ordinances and development regulations allow and encourage housing production to levels (e.g., densities) that improve jobs-housing balances for all income levels

EXPANDED HOUSING AND NEIGHBORHOOD CHOICE FOR ALL RESIDENTS

<p>Expanding Housing Choice (H-18)</p>	<p>GMA: N/A</p> <p>VISION 2050: Plans should reduce disparities in access to opportunity through inclusive planning and targeted investments (<i>MPP-DP-2</i>)</p>	<p>CPPs provide further specificity on methods of increasing housing choice, addressing current disparities in access to opportunity, and meeting the needs of current and future residents</p> <ul style="list-style-type: none"> • H-18 (b) asks for expanding, where appropriate, 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 • H-18 (d) asks for providing access to housing types serving 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
<p>Displacement Mitigation and Anti-Displacement Strategy Implementation (H-20)</p>	<p>GMA: Plans have analyses that identify areas at higher risk of displacement from market forces that occur in tandem with zoning changes and public investments and policies that mitigate displacement. (see <i>RCW 36.70A.070 (2)(d)(iii)</i> for suggested strategies)</p> <p>VISION 2050: Like state requirements, but mitigation measures <i>to extent feasible</i> (<i>MPP-DP-23, H-12</i>)</p>	<ul style="list-style-type: none"> • H-20 provides further specificity than State requirements to adopt policies and strategies that promote equitable development, with consideration given to dedicated funds for land acquisition, manufactured housing, and community preservation • H-20 also asks for specification on <i>when</i> policies will be implemented. Anti-displacement measures should be put in place prior to or concurrent with land capacity increases and public capital investments

<p>Plans to Increase Opportunities for Affordable Homeownership (H-19)</p>	<p>GMA: <i>N/A</i></p> <p>VISION 2050: Requires that plans promote homeownership opportunities for low-, moderate-, and middle-income families and individuals facing historic inequities in access to homeownership (<i>MPP-H-5</i>)</p>	<ul style="list-style-type: none"> • H-19 asks plan to address barriers to and promote access to affordable homeownership for extremely low-, very low-, and low-income households • Plans should emphasize: <ul style="list-style-type: none"> ○ supporting long-term affordable homeownership programs for households making below 80% of AMI ○ remedying historical inequities in and expanding access for Black, Indigenous, and people of color communities
<p>Fair Housing (H-21)</p>	<p>GMA: <i>N/A</i></p> <p>VISION 2050: <i>N/A</i></p>	<ul style="list-style-type: none"> • The CPPs require jurisdictions to implement policies that promote, and enforce fair housing policies and practices for relevant categories of protected people (see CPP H-21 for list)
<p>HOUSING STABILITY, HEALTHY HOMES, AND HEALTHY COMMUNITIES</p>		
<p>Safe and Healthy Homes (H-23 & H-24)</p>	<p>GMA: <i>N/A</i></p> <p>VISION 2050: Encourages integration of health and wellbeing considerations into planning (<i>MPP-DP-16</i>) and the development and implementation of design guidelines that lead to the construction of healthy buildings and facilities to promote healthy people (<i>MPP-DP-19</i>)</p>	<ul style="list-style-type: none"> • H-24 requires that jurisdictions make plans for neighborhoods that protect and promote the health and well-being of residents, through strategies detailed in the policy text
<p>IMPLEMENTATION, MONITORING, AND ADJUSTMENT</p>		
<p>Data Collection and Reporting (H-25-H-27)</p>	<p>GMA: <i>N/A</i></p> <p>VISION 2050: <i>N/A</i></p>	<ul style="list-style-type: none"> • The CPPs outlines requirements for the county and cities to collect and report housing data to help evaluate progress in meeting countywide need • Further detail on the data collection and provision required from jurisdictions by the CPPs can be found in the text of policy H-25. Monitoring procedures are also detailed in Appendix 4 of the CPPs.