

Memo

To: King County Affordable Housing Committee Members
From: Isaac Horwith, Affordable Housing Planning Program Manager,
Carson Hartmann, Regional Affordable Housing Planner,
Skye D'Aquila, Affordable Housing Planner
cc: Housing Interjurisdictional Team
Date: April 29, 2024
Re: AHC Review of Burien, Maple Valley, and Algona Draft Comprehensive Plans

Purpose of May 2 AHC Meeting

At the May 2 Affordable Housing Committee (AHC) meeting, AHC staff will brief the AHC on findings from their review of the housing-related components of the cities of Burien, Maple Valley, and Algona's draft comprehensive plans and submission materials. Following the briefing, members will consider and possibly approve letters commenting on the alignment of each city's draft comprehensive plan with the goals and policies of the King County Countywide Planning Policies Housing Chapter.

To prepare for the meeting, AHC members should prioritize review of this memo and the draft comment letters for each city (see Exhibits 1, 2 and 3), and prepare any questions or comments for discussion.

AHC members can use the following hyperlinks to access materials submitted by each jurisdiction:

Burien

- [Draft Housing Element](#)
- [Draft Land Use Element](#)
- [Burien Housing Policy Evaluation draft](#)
- Burien Land Use [Map Alt 1](#), [Alt 2](#), and [Alt 3](#)
- [Completeness Checklist](#)
- [Draft Implementation Strategies Workbook](#)

Maple Valley

- [Draft Housing Element](#)
- [Draft Land Use Element](#)
- [Housing Technical Appendix draft](#)
- [Draft Land Use Map](#)
- [Completeness Checklist](#)
- [Draft Implementation Strategies Workbook](#)

Algona

- [Draft Housing Element](#)
- [Housing Needs Assessment draft](#)
- [Zoning Map](#)
- [Completeness Checklist](#)
- [Draft Implementation Strategies Workbook](#)

Background

The King County Countywide Planning Policies (CPPs) that establish the housing-focused draft comprehensive plan review program were adopted by King County Council and ratified by King

County cities in 2023.¹ The AHC conducts this review on behalf of the Growth Management Planning Council (GMPC).

The plan review program was designed to:

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

To meet these goals, the GMPC adopted the following three plan review standards² which the AHC and staff use to evaluate alignment between jurisdictional comprehensive plans and CPP Housing Chapter policies:

1. The policies and related appendices evidently address all CPP Housing Chapter policies.
2. Submission materials include implementation strategies for Housing Chapter CPPs requiring policy adoption and/or implementation. Implementation strategies should identify:
 - a. the regulatory or non-regulatory measures to be used to implement goals and policies used to address CPP Housing Chapter policies; and
 - b. an adoption schedule (by year) for each measure.
3. The plan lays out meaningful policies that, taken together, support the jurisdiction's ability to equitably meet housing need by promoting: 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.³

Maple Valley, Burien, and Algona submitted their materials for AHC review on March 6, March 7, and March 11, 2024, respectively. In March and April 2024, AHC staff conducted their review of each city's draft comprehensive plan and related submission materials, guided by the adopted plan review standards, and drafted comment letters for AHC consideration.

The comment letters identify strong areas of alignment with the CPPs and recommend actions necessary to align with the CPPs. AHC staff presented draft letters to the AHC Chair, King County Councilmember Claudia Balducci, and Vice Chair, Futurewise Executive Director Alex Brennan. As part of a pilot peer review program, select planning and housing policy staff from jurisdictions that

¹ Countywide Planning Policy H-26 directs the GMPC or its designee to conduct a housing-focused review of all King County jurisdiction's draft periodic comprehensive plan updates for alignment with the Housing Chapter goals and policies prior to plan adoption and provide comments [\[link\]](#)

² See Attachment B: Housing-Focused Comprehensive Plan Review Standards in GMPC Motion 23-1 [\[link\]](#)

³ 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

serve on the AHC’s Housing Interjurisdictional Team reviewed and provided input on the draft comment letters. The Chair shared the draft letters with Burien, Maple Valley, and Algona officials in advance of the May 2 AHC meeting. All three letters are on the agenda for discussion at the meeting. Once approved, AHC staff will post the issued letters online and the AHC Chair or designee will email the letters to Burien, Maple Valley, and Algona staff.

After adoption of their plans, Burien, Maple Valley, and Algona may send updated implementation strategies to AHC staff. The AHC will measure Burien, Maple Valley, and Algona’s progress to plan for and accommodate their housing need annually following adoption of their comprehensive plan. The GMPC will review the information collected through annual monitoring and reporting to conduct a mid-point check-in and adjustment five years after plan adoption, in 2029.

The following section provides an overview of each jurisdiction, their housing needs, and a summary of the recommended actions each city needs to take to align with the goals and policies of the CPP Housing Chapter detailed in each draft comment letter (see Exhibits 1, 2, and 3). Reported data comes from each jurisdiction’s draft comprehensive plan, except for the following:

- jurisdiction’s median household income;⁴
- King County’s median household income;⁵
- King County’s percentage of residents of color; and⁶
- housing needs.⁷

⁴ ACS 5-year estimates 2017-2021.

⁵ ACS 5-year estimates 2017-2021.

⁶ ACS 1-year estimates 2022.

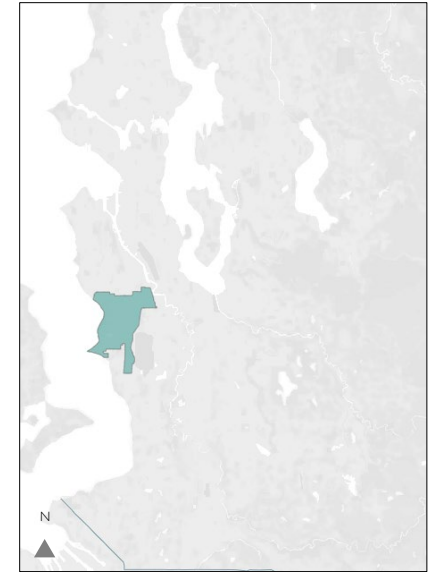
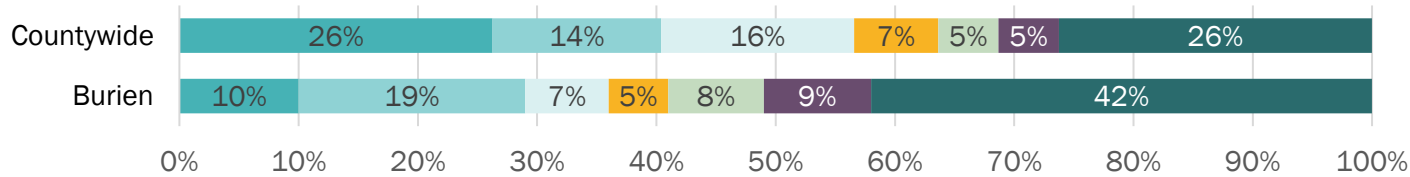
⁷ King County (Last Ratified 2023 November 30). 2021 King County Countywide Planning Policies, Housing Chapter. [[link](#)]

City of Burien

51,985 People (2.2% of King County) | \$79,797 Median Household Income (King County AMI \$106,326)

Housing Needs

	Total	Permanent Housing Needs							Emergency Housing Needs
		0 to ≤30% PSH	Non PSH	>30 to ≤50%	>50 to ≤80%	>80 to ≤100%	>100 to ≤120%	>120%	
Baseline Supply: 2019	20,785	-	990	3,933	5,442	3,772	2,704	3,944	250
Net New Need: 2019-2044	7,500	759	1,444	524	407	574	650	3,142	1,433
Total Future Need: 2044	28,285	759	2,434	4,457	5,849	4,346	3,354	7,086	1,683



Geography: Burien is part of Puget Sound Regional Council’s Core Cities regional geography, meaning PSRC considers it to be among the most intensely urban places in the region

Key Facts

- Burien has a higher percentage of residents of color (52%) compared to King County (47%).
- The majority of Burien’s housing stock is comprised of single-family homes (61%) and multifamily buildings (34%).
- Burien’s analysis found that 13 of the 15 census tracts in Burien are at high risk of displacement
- By 2023 estimates, there are around 100-200 unhoused people in Burien. The jurisdiction has two shelters that serve families or women.
- Rapid Ride H opened downtown and along the Ambaum Boulevard subarea in 2023.

Draft AHC Recommendations

1. Prioritize extremely low-income households (CPP H-2).
2. Complete the housing inventory and analysis (CPP H-3).
3. **FOR DISCUSSION:** Address gaps in emergency housing (CPPs H-1, H-4, H-9, H-11, and H-12).
4. Explicitly plan for and prioritize income-restricted housing (CPPs H-10, H-14, and H-17).
5. Increase housing choice near employment opportunities (CPP H-15).

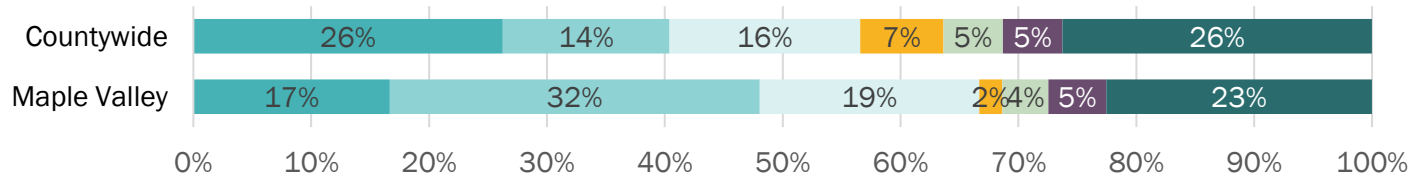
See Exhibit 1 for the full draft letter, including details regarding each recommendation.

City of Maple Valley

28,920 People (1.2% of King County) | \$125,092 Median Household Income (King County AMI \$106,326)

Housing Needs

	Total	Permanent Housing Needs						Emergency Housing Needs	
		0 to ≤30% PSH	Non PSH	>30 to ≤50%	>50 to ≤80%	>80 to ≤100%	>100 to ≤120%		>120%
Baseline Supply: 2019	9,435	-	164	432	1,044	2,300	1,984	3,511	-
Net New Need: 2019-2044	1,720	285	542	320	26	72	81	394	329
Total Future Need: 2044	11,155	285	706	752	1,070	2,372	2,065	3,905	329



Key Facts

- Maple Valley has a smaller percentage of residents of color (29%) compared to King County (47%), though racial diversity in the jurisdiction is increasing.
- Most of Maple Valley’s households own their home, with only 15% of households renting.
- The majority of Maple Valley’s housing stock is comprised of one-unit structures, such as single-family homes (85%).
- Between 2000-2023, a typical home value increased about 67%, while income only increased about 20% around the same timeframe.
- Over 20% of households are cost burdened, with BIPOC households experiencing greater levels (34%) of cost burden than White households (25%).

Draft AHC Recommendations

1. Address racial disparities in homeownership and cost burden (CPPs H-4, H-9, H-19, H-20).
2. Clarify community engagement findings (CPP H-8).
3. Prioritize extremely low-income households (CPPs H-2, H-12, H-14).
4. **FOR DISCUSSION:** Increase housing options for 0 to 80 percent AMI households in Residential zones (CPPs H-9, H-18(a), H-25).
5. Summarize findings from the housing inventory and analysis (CPP H-3).
6. Complete the housing inventory and analysis (CPP H-3).

See Exhibit 2 for the full draft letter, including details regarding each recommendation.



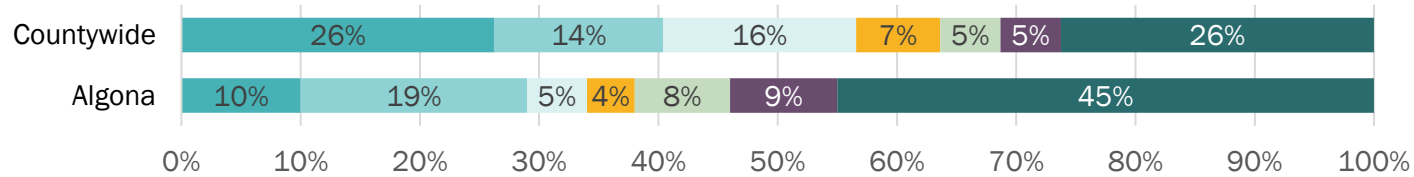
Geography: Maple Valley is part of Puget Sound Regional Council’s Cities and Towns regional geography, meaning PSRC considers it to have smaller downtowns and local centers.

City of Algona

3,170 People (0.1% of King County) | \$78,040 Median Household Income (King County AMI \$106,326)

Housing Needs

	Total	Permanent Housing Needs							Emergency Housing Needs
		0 to ≤30% PSH	Non PSH	>30 to ≤50%	>50 to ≤80%	>80 to ≤100%	>100 to ≤120%	>120%	
Baseline Supply: 2019	1,049	-	23	310	400	182	72	62	-
Net New Need: 2019-2044	170	17	32	8	7	14	16	76	32
Total Future Need: 2044	1,219	17	55	318	407	196	88	138	32



Key Facts

- Algona has a larger percentage of residents of color (51%) compared to King County (47%).
- Algona has higher rates of homeownership (78%) than King County (57%).
- The majority of Algona’s housing stock is comprised of single-family homes (71%) and mobile homes (19%).
- Algona has over twice the number of jobs as housing units (2.19 jobs-to-housing ratio).

Draft AHC Recommendations

1. Remove potential barriers to middle housing, transitional, supportive, and emergency housing (CPPs H-1, H-13, H-18, H-19, and H-22).
2. Complete the housing inventory and analysis (CPP H-3).
3. Identify gaps in existing partnerships, policies, and dedicated resources (CPP H-4).
4. **FOR DISCUSSION:** Address potential segregation and negative environmental health impacts for low-income households (CPPs H-18, and H-25).
5. Take targeted actions to repair harms to BIPOC households (CPP H-9).

See Exhibit 3 for the full draft letter, including details regarding each recommendation.



Geography: Algona is part of Puget Sound Regional Council’s Cities and Towns regional geography, meaning PSRC considers it to have smaller downtowns and local centers.

Exhibit 1: Draft Comment Letter for the City of Burien

Alex Hunt, Senior Planner
Community Development
400 SW 152nd St, Suite 300,
Burien, WA 98166

Dear Mr. Hunt,

Thank you for submitting the City of Burien's draft comprehensive plan to the Affordable Housing Committee (AHC) for review on March 11, 2024. On behalf of the AHC, I am sending you this summary of our review and recommendations.

Background

The AHC is a subcommittee of the Growth Management Planning Council (GMPC), consisting of representatives of King County and its cities, housing providers, area employers, and others. By direction of the GMPC, the AHC now conducts a housing-focused review of all King County jurisdictions' draft periodic comprehensive plan updates, assessing the draft plans for alignment with the [King County Countywide Planning Policies](#) (CPP) Housing Chapter goals and policies prior to plan adoption.

As you know, our county is experiencing a deep and persistent housing shortage. In 2021 the State of Washington adopted [House Bill 1220](#), which amended the Growth Management Act, requiring local governments to plan for and accommodate housing that is affordable to all income levels, including emergency housing. In response to this state mandate and local interest in improving the effectiveness of local housing plans and policies, the AHC led a two-year process to amend the CPPs.

The result was a significant update to the CPP Housing Chapter, which was recommended by the GMPC, adopted by the King County Council, and ratified by the cities in 2023. The goals of both the statute and this implementation work are to encourage cities and King County to work together to provide a full range of affordable, accessible, healthy, and safe housing choices to every resident in King County.

This review is guided by Housing-Focused Comprehensive Plan Review Standards, as adopted by [GMPC Motion 23-2](#). In summary, the AHC review seeks to determine whether each jurisdiction's draft plan and submission materials:

1. Address all CPP Housing Chapter policies;
2. Articulate implementation strategies for relevant CPP Housing Chapter Policies; and
3. Lay out meaningful policies that, taken together, support the jurisdiction's ability to equitably meet housing needs.

AHC members appreciate Burien being one of the first jurisdictions to submit their proposed plan to the program in 2024. This program is still relatively new and evolving, and your engagement helped the AHC understand how jurisdictions are seeking to address their housing needs while aligning with the recent changes at the state, regional, and county levels.

The AHC acknowledges the substantial amount of time and effort that went into Burien’s draft comprehensive plan. Many of Burien’s plans policies, analyses, and implementation strategies align well with CPP Housing Chapter policies. In particular,

1. The new Community Health and Well-being Chapter is a creative planning approach that includes housing-related policies that will help ensure new development is focused in areas that promote community health and well-being and mitigate noise, air, and other hazards.
2. Burien’s Affordable Housing Demonstration Program is a strong example of a jurisdiction proactively partnering with housing providers to understand how the jurisdiction can provide flexibility in its code to reduce costs and create more affordable housing. This resulted in moving forward three affordable housing projects, totaling 162 units affordable to households with incomes at or below 50 percent AMI. The AHC looks forward to reviewing the lessons learned and the permanent code changes Burien proposed adopting in 2024 as part of the implementation strategies submitted to the AHC.
3. If adopted, the anti-displacement measures identified in Section 3.5.3.3 in Burien’s draft environmental impact statement would be a meaningful response to mitigating displacement risk throughout Burien. This is particularly important in the Ambaum Boulevard subarea, where Rapid Ride H, a major investment that can increase the risk of displacement, recently opened.

Below, the AHC includes recommendations necessary to align with the CPP Housing Chapter policies.

Recommendations to Align with the CPP Housing Chapter

Burien needs to take the following actions to align its comprehensive plan with CPP Housing Chapter polices and goals.

1. Prioritize extremely low-income households (CPP H-2)

Relevant Countywide Planning Policies

CPP H-2 requires jurisdictions prioritize the need for housing affordable to households with incomes less than or equal to 30 percent of area median income (AMI).

Burien’s Proposal and AHC Findings

Burien’s submission to the AHC identifies its existing Rental Housing Inspection Program as responsive to CPP H-2. While the program likely serves extremely low-income households (households with incomes at or below 30 percent of AMI), this program does not explicitly prioritize this population. Burien’s submission also identifies many policies as responsive to CPP H-2 that use the term “low-income,” which includes, but is not limited to, extremely low-income households. Additionally, proposed Housing Chapter policy 4.2-2 states Burien will provide opportunities for an economically diversified housing supply, including the needs for extremely low-income households. However, based on the materials Burien submitted, the AHC does not see a clear *prioritization* for the housing needs of 0 to 30 percent AMI households.

Recommendation 1: Burien should amend its Housing Element and the implementation strategies submitted to the AHC to more explicitly demonstrate how its policies and strategies prioritize the housing needs of 0 to 30 percent AMI households to align with CPP H-2. For examples of strategies jurisdictions could use to align with CPP H-2, see the CPP Housing Chapter Technical Appendix.¹

2. Complete the housing inventory and analysis (CPP H-3)

Relevant Countywide Planning Policies

CPP H-3 directs jurisdictions to conduct a housing inventory and analysis to help identify and address the greatest needs as well as summarize the findings in the Housing Element.

Burien's Proposal and AHC Findings

While Burien's submission includes many data points and substantive analysis, the AHC could not find all of the specific information required by H-3(d), (e), (g), (j), (k), and (m). This includes:

- d. percentage and geographic distribution of residential land zoned for moderate- and high-density housing and accessory dwelling units in the jurisdiction;
- e. number of income-restricted units and, where feasible, total number of units, within a half-mile walkshed of high-capacity or frequent transit service where applicable and regional and countywide centers;
- g. current population characteristics expressed by: a) age by race/ethnicity, and b) disability;
- j. ratio of housing to jobs in the jurisdiction;
- k. summary of existing and proposed partnerships and strategies, including dedicated resources, for meeting housing needs, particularly for populations disparately impacted; and
- m. the housing needs of communities experiencing disproportionate harm of housing inequities including Black, Indigenous, and People of Color (BIPOC).

This additional analysis should inform additional comprehensive plan policy responses and strategies. For example, analysis responsive to CPP H-3(k) could help inform the analysis of gaps and barriers in existing policies and strategies, as required by CPP H-4. Analysis responsive to CPP H-3(m) could help Burien identify specific solutions to repair harm done to BIPOC households, as required by CPP H-9.

Recommendation 2: Burien should include all inventory and analysis components as required by CPP H-3 in the comprehensive plan and summarize the findings in the Housing Element. This additional analysis should inform additional comprehensive plan policy responses and strategies.

3. Address gaps in emergency housing (CPPs H-1, H-4, H-9, H-11, and H-12)

Relevant Countywide Planning Policies

¹ See King County Countywide Planning Policies Appendix 4: Housing Technical Appendix, pp.82 [[link](#)]

CPP H-1 requires all jurisdictions to plan for and accommodate a net new emergency housing need of 1,433 beds. CPP H-4 directs jurisdictions to evaluate the effectiveness of existing housing policies and strategies and identify gaps for meeting housing needs and eliminating racial and other disparities in access to housing and neighborhoods of choice. CPP H-9 requires jurisdictions adopt intentional, targeted actions that repair harms to BIPOC households from identified past and current racially exclusive and discriminatory land use and housing practices. The King County Regional Homelessness Authority’s findings on racial disparities among people experiencing homelessness highlight the importance of addressing a jurisdiction’s emergency housing needs as part of aligning with CPP H-9.² CPP H-11 directs jurisdictions to identify sufficient capacity for land for housing, including but not limited to emergency housing and shelters. Finally, CPP H-12 directs jurisdictions to adopt and implement policies that improve the effectiveness and address gaps to meet the jurisdiction’s housing needs.

Burien’s Proposal and AHC Findings

The draft Homeless Shelters and Permanent Supportive Housing section of the Housing Element identifies a gap that Burien does not have designated emergency housing spaces for single men, youth, or couples (pp.4-12). Identifying this gap is consistent with CPP H-4 and a critical step in Burien meaningfully addressing its emergency housing needs. While the submission did include a tiny home implementation strategy for 2024, it is not clear if Burien expects this strategy to meet the full identified need to provide emergency housing spaces for single men, youth, or couples.

While Burien’s draft Housing Element policy 4.2-2 directs Burien to provide land use and zoning opportunities consistent with its allocated need, and Burien submitted an implementation strategy to allow for emergency housing in all zones allowing residential development and hotels, Burien did not provide supporting documentation demonstrating that they:

- have one or more zones that allow hotels, all of which allow for emergency housing by right or allow emergency housing by right in a majority of zones within a one-mile proximity to transit and
- have no regulations that limit the occupancy, spacing or intensity of emergency housing.

According to Washington State Department of Commerce guidance,³ Burien must either demonstrate it meets the conditions above or conduct an emergency housing capacity analysis to show sufficient capacity for its emergency housing needs prior to adoption of its comprehensive plan and include it in their plan. Without sufficient documentation of compliance with state requirements or an emergency housing capacity analysis, the AHC cannot determine if this implementation strategy will provide sufficient capacity as required in CPP H-11.

To ensure Burien is consistent with the CPPs identified in this recommendation, as well as Burien’s proposed draft Human Services Element policy 5.1.6 to “make Burien a welcoming and just community marked by fairness and equity provided to those disproportionately affected by poverty, discrimination, and victimization,” Burien must plan for and accommodate emergency housing needs for all populations experiencing homelessness. To do so, Burien must state a clear policy of active city involvement and implementation strategy that outlines the city’s actions to address the emergency housing gap for single men, youth, and couples. In absence of such a policy and

² King County Regional Homelessness Authority. *Data Overview*. [\[link\]](#)

³ Washington State Department of Commerce. *Guidance for Updating your Housing element (Book 2)*. [\[link\]](#)

implementation strategy, it does not appear that Burien’s plan will meaningfully plan for and accommodate its emergency housing need (CPP H-1).

Recommendation 3: To meaningfully plan for and accommodate emergency housing needs consistent with CPP H-1, be responsive to the findings in CPP H-2, and align with CPPs H-9, H-11, and H-12, Burien should demonstrate that its proposed land use and zoning changes provide sufficient capacity for emergency housing, consistent with guidance from the Washington State Department of Commerce. Burien should also provide the AHC with complete and meaningful implementation strategies to address its gap of having no emergency housing designated for single men, youth, and couples. Burien can wait until after comprehensive plan adoption to submit the implementation strategies but must conduct and document the land capacity analysis within the adopted comprehensive plan.

4. Explicitly plan for and prioritize income-restricted housing (CPPs H-10, H-14, and H-17)

Relevant Countywide Planning Policies

CPPs H-10, H-14, and H-17 address the need for “income-restricted housing.” CPP H-10 requires 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. CPP H-14 requires jurisdictions to prioritize resources for income-restricted housing, particularly for extremely low-income households, populations with special needs, and others with disproportionately greater housing needs. CPP H-17 requires jurisdictions to support the development and preservation of income-restricted affordable housing that is within walking distance to planned or existing high-capacity and frequent transit.

Burien’s Proposal and AHC Findings

Burien’s draft plan proposes policies and implementation strategies that frequently use the term “affordable housing” and will likely support development of income-restricted affordable housing. Income-restricted housing is guaranteed to provide lower-income people with an affordable place to live through a regulatory restriction to limit its price to be affordable to households at certain income levels. The term “affordable housing” includes income-restricted affordable housing, but also naturally occurring affordable housing, which is not guaranteed to remain affordable. Burien’s Housing Chapter policy 4.1.1 also identifies protecting naturally occurring affordable housing through the use of long-term affordability covenants. However, the CPP Housing Chapter’s requirements related to income-restricted housing are broader than policy 4.1.1 as drafted, and use of the term “affordable housing” does not necessarily align with “income-restricted.”

Recommendation 4: To align with CPPs H-10, H-14, and H-17, Burien should include policies, incentives, strategies, actions, and regulations in its plan and/or implementation strategies that explicitly increase the supply of long-term income-restricted housing. Burien should also include policies that prioritize resources for this housing need and support the development and preservation of income-restricted affordable housing within walking distance to transit. For examples of strategies jurisdictions may use to align with these CPPs, see the CPP Housing Chapter Technical Appendix.

5. Increase housing choice near employment opportunities (CPP H-15)

Relevant Countywide Planning Policies

CPP H-15 requires jurisdictions to increase housing choices for everyone, particularly those earning lower wages within a reasonable commute to employment centers and affordable at all income levels.

Burien's Proposal and AHC Findings

Burien's draft plan proposes policies that increase housing choice in areas throughout the jurisdiction and appear to demonstrate an intent in alignment with CPP H-15. However, the AHC did not identify a policy that explicitly links increasing housing choice affordable to everyone with employment opportunities.

Recommendation 5: To align with CPP H-15, Burien should include a policy in their comprehensive plan that states their intent to increase housing choices affordable to everyone within a reasonable commute to employment centers.

Conclusion and AHC Resources

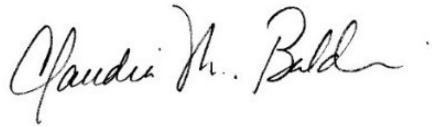
Thank you again for your submission to the Committee's housing-focused comprehensive plan review program. AHC members valued the opportunity to review Burien's January 2024 Draft Burien 2044: Our Comprehensive Plan and related submission materials. Burien's participation in the plan review program is instrumental in the broader work of the Committee to empower local jurisdictions to address the affordable housing crisis in King County.

AHC staff are happy to assist Burien in addressing these recommendations. For immediate resources and guidance on aligning with the CPP Housing Chapter, refer to the

- [Engrossed 2021 King County CPPs](#);
- [AHC Housing-focused Draft Comprehensive Plan Review Program Guide](#);
- [King County Resources for Documenting the Local History of Racially Exclusive and Discriminatory Land Use and Housing Practices](#); and
- [Countywide Planning Policies Housing Chapter Frequently Asked Questions](#).

If you have questions or need additional information regarding aligning with the CPP Housing Chapter, please contact lead staff for the AHC plan review program, Isaac Horwith, at AHCplanreview@kingcounty.gov or at 206-477-7813.

Sincerely,

A handwritten signature in black ink that reads "Claudia M. Balducci". The signature is written in a cursive, flowing style.

Claudia Balducci
Affordable Housing Committee, Chair
King County Councilmember, District 6

CC Dow Constantine
Growth Management Planning Council Chair
King County Executive

Laura Hodgson
Washington State Department of Commerce, Senior Planner

Plan Review Team
King County Affordable Housing Committee

Plan Review Team
Puget Sound Regional Council

Exhibit 2: Draft Comment Letter for the City of Maple Valley

Tawni Dalziel, Director
Public Works and Community Development
City of Maple Valley
22017 SE Wax Road, Suite 200
Maple Valley, WA 98038

Dear Ms. Dalziel,

Thank you for submitting the City of Maple Valley's draft comprehensive plan to the Affordable Housing Committee (AHC) for review on March 11, 2024. On behalf of the AHC, I am sending you this summary of our review and recommendations.

Background

The AHC is a subcommittee of the Growth Management Planning Council (GMPC), consisting of representatives of King County and its cities, housing providers, area employers, and others. By direction of the GMPC, the AHC now conducts a housing-focused review of all King County jurisdictions' draft periodic comprehensive plan updates, assessing the draft plans for alignment with the [King County Countywide Planning Policies](#) (CPP) Housing Chapter goals and policies prior to plan adoption.

As you know, our county is experiencing a deep and persistent housing shortage. In 2021 the State of Washington adopted [House Bill 1220](#), which amended the Growth Management Act, requiring local governments to plan for and accommodate housing that is affordable to all income levels, including emergency housing. In response to this state mandate and local interest in improving the effectiveness of local housing plans and policies, the AHC led a two-year process to amend the King County Countywide Planning Policies (CPP).

The result was a significant update to the CPP Housing Chapter, which was recommended by the GMPC, adopted by the King County Council, and ratified by the cities in 2023. The goals of both the statute and this implementation work are to encourage cities and King County to work together to provide a full range of affordable, accessible, healthy, and safe housing choices to every resident in King County.

This review is guided by Housing-Focused Comprehensive Plan Review Standards, as adopted by [GMPC Motion 23-2](#). In summary, the AHC review seeks to determine whether each jurisdiction's draft plan and submission materials:

1. Address all CPP Housing Chapter policies;
2. Articulate implementation strategies for relevant CPP Housing Chapter Policies; and
3. Lay out meaningful policies that, taken together, support the jurisdiction's ability to equitably meet housing needs.

AHC members appreciate Maple Valley being one of the first jurisdictions to submit to the program in 2024. This program is still relatively new and evolving, and your engagement helped the AHC understand how jurisdictions are seeking to address their housing needs while aligning with the recent changes at the state, regional, and county levels.

The AHC acknowledges the substantial amount of time and effort that went into Maple Valley's Draft Comprehensive Plan. Many of the proposed policies and analyses prepared to inform the policies align well with CPP Housing Chapter policies. In particular,

1. Maple Valley, a member of South King Housing and Homelessness Partners (SKHHP), committed to contribute a portion of funds from the housing and related services sales tax to SKHHP to support the development of affordable housing. This partnership, outlined in Maple Valley's implementation strategies to their proposed Housing Element policy HO-P1.4, aligns with CPPs that promote regional collaboration and require adoption of policies that increase housing supply, particularly for households with the greatest needs (see CPPs H-6, H-12, H-13, and H-14).
2. Maple Valley proposes to explore a partnership with the Soos Creek Water and Sewer District to replace septic with sewer infrastructure in certain residential areas. If implemented, this partnership, outlined in Housing Element policy HO-P1.4, has the potential to create opportunities for greater levels of housing density and diversity across the City. The partnership and commitment to engagement with impacted communities, in the event that sewer is extended, align well with CPPs H-6, H-19, H-24, and H-25.

Below, the AHC includes recommendations necessary for Maple Valley to align with the CPP Housing Chapter policies.

Recommendations to Align with the CPP Housing Chapter

Maple Valley needs to take the following actions to align its comprehensive plan with CPP Housing Chapter goals and policies.

1. Address racial disparities in homeownership and cost burden (CPPs H-4, H-9, H-19, H-20)

Relevant Countywide Planning Policies

CPP H-4 requires all jurisdictions to identify gaps for meeting housing needs and eliminating racial and other disparities in access to housing and neighborhoods of choice. CPP H-9 requires all jurisdictions to adopt intentional, targeted actions that repair harms from identified past and current racially exclusive and discriminatory land use and housing practices. CPP H-19 requires all jurisdictions to lower barriers to and promote access to affordable homeownership for extremely low-, very low-, and low-income households and emphasize remedying historical inequities in and expanding access to homeownership opportunities for Black, Indigenous, and People of Color (BIPOC) communities. CPP H-20 requires all jurisdictions to address gaps in partnerships, policies, and dedicated resources to eliminate racial and other disparities in access to housing.

Maple Valley's Proposal and AHC Findings

Maple Valley's Housing Element Technical Appendix identifies racial disparities in homeownership and cost burden rates among their residents (Chapter 1, pp.11,13). While Maple Valley proposes a number of strategies to improve housing affordability, such as those identified in Housing Element Policy HO-P1.4, the plan does not articulate how these strategies respond to the racial disparities identified in their Housing Element Technical Appendix. Additionally, proposed Housing Element policy HO-P4.2 states "If [racially disparate impacts and displacement risk levels identified in the Housing Element] trends monitored...are worsening, review City plans, policies, and codes and update as needed to improve outcomes." While the AHC celebrates Maple Valley's commitment to monitoring and responding to future racially disparate impacts, Maple Valley should also commit to

address current racial disparities in homeownership and cost burden in their comprehensive plan in order to align with CPP H-9.

Recommendation 1: To align with CPP H-9, Maple Valley should amend policy HO-P4.2 to address racially disparate impacts soon after plan adoption. To align with CPPs H-4, H-9, H-19, and H-20, Maple Valley should amend its Housing Element to clarify how its existing policies or include a new policy to address racial disparities in homeownership rates and cost burden. For examples of strategies Maple Valley could use to align with CPPs, see the CPP Housing Chapter Technical Appendix.¹

2. Clarify community engagement findings (CPP H-8)

Relevant Countywide Planning Policies

CPP H-8 requires all jurisdictions to collaborate with and prioritize the needs of populations most disproportionately impacted by housing cost burden.

Maple Valley's Proposal and AHC Findings

According to Maple Valley's Housing Element Technical Appendix, BIPOC households are more likely to be housing cost burdened than White households and very low-income and extremely low-income households are much more likely to be severely cost burdened than any other income group (Chapter 1, pp.13). The Targeted Engagement Summary section of Maple Valley's Community Engagement Appendix of the Draft Comprehensive Plan summarizes takeaways from engagement with impacted communities² and housing developers (pp.3-11). However, the provided summary combines input from impacted communities and housing developers. Disaggregating input from impacted communities in the Target Engagement Summary will allow Maple Valley to clearly demonstrate how they are prioritizing "populations most disproportionately impacted by housing cost burden" in the plan.

Recommendation 2: To align with CPP H-8, Maple Valley should disaggregate input from community engagement to clarify how the plan prioritizes the needs of populations disproportionately impacted by housing cost burden.

3. Prioritize extremely low-income households (CPPs H-2, H-12, H-14)

Relevant Countywide Planning Policies

CPP H-2 requires all jurisdictions to prioritize the need for housing affordable to households less than or equal to 30 percent area median income (AMI). CPP H-12 requires all jurisdictions to adopt and implement policies that address gaps in policies and dedicated resources to meet housing needs. CPP H-14 requires all jurisdictions to prioritize resources for income-restricted housing, particularly for extremely low-income households, populations with special needs, and others with disproportionately greater housing needs.

Maple Valley's Proposal and AHC Findings

¹ See King County Countywide Planning Policies Appendix 4: Housing Technical Appendix, page 82 [\[link\]](#)

² The Target Engagement Summary of Maple Valley's plan defines these community members as "people with low incomes, people who are BIPOC (Black, Indigenous, or People of Color), youth and young families, renters, people with disabilities, and people experiencing homelessness" (pp.2)

Maple Valley demonstrates sufficient capacity for its housing needs of 827 units affordable to 0 to 30 of AMI. The plan also proposes to remove barriers to the production of affordable housing, including barriers to permanent supportive housing (Housing Technical Appendix, Chapter 1, pp.17). However, Maple Valley’s Housing Technical Appendix also states there are no income-restricted housing units in Maple Valley affordable to extremely low-income households (households with incomes at or below 30 percent of AMI), demonstrating a clear gap in current policies to meet extremely low-income housing needs (Housing Technical Appendix, Chapter 1, pp.17). The AHC did not see policies and companion implementation strategies that clearly and specifically demonstrate how the City is addressing this gap or prioritizing housing needs of extremely low-income households in Maple Valley’s Draft Housing Element and other submission materials.

Recommendation 3: To align with CPP H-2, H-12, and H-14, Maple Valley should include additional or revised policies and/or implementation strategies that:

- increase the availability of long-term housing affordable to households earning 0 to 30 percent of AMI; and
- explicitly prioritize extremely low-income households.

For examples of strategies jurisdictions could use to align with the CPPs, see the CPP Housing Chapter Technical Appendix

4. Increase housing options for 0 to 80 percent AMI households in Residential zones (CPPs H-9, H-18(a), H-25)

Relevant Countywide Planning Policies

CPP H-9 requires all jurisdictions to adopt intentional, targeted actions that repair harms to BIPOC households from past and current racially exclusive and discriminatory land use and housing practices. CPP H-18(a) requires all jurisdictions to adopt inclusive planning tools and policies that increase the ability of all residents in jurisdictions throughout King 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 providing access to affordable housing to rent and own throughout the jurisdiction, with a focus on areas of high opportunity. CPP H-25 requires all jurisdictions to plan for residential neighborhoods that protect and promote the health and well-being of residents by supporting equitable access to parks and open space, safe pedestrian and bicycle routes, clean air, soil and water, fresh and healthy foods, high-quality education from early learning through kindergarten through twelfth grade, affordable and high-quality transit options and living wage jobs and by avoiding or mitigating exposure to environmental hazards and pollutants.

Maple Valley’s Proposal and AHC Findings

Maple Valley’s Draft Comprehensive Plan proposes to accommodate the majority of the City’s 0 to 80 percent AMI housing needs the City’s Community Business, Regional Learning & Technology Center, and Downtown zones. The City’s remaining residential land capacity is in Residential zones. This proposed land use pattern represents an important step forward in Maple Valley to accommodate more housing affordable to 0 to 80 of AMI households. However, the AHC finds that Maple Valley’s proposed land use pattern does not: 1) meaningfully increase affordable options for low income households “throughout” the city, with a focus on high opportunity areas (CPP H-18(a)), 2) represent a targeted and intentional action to repair harm caused by racially exclusive and

discriminatory land use patterns (CPP H-9), and 3) plan for residential neighborhoods that protect and promote the health and well-being of residents (CPP H-25). Specifically, the AHC notes that:

1. The plan appears to limit housing options affordable to households at or below 80 percent of AMI in Residential zones, which encompass the majority of the City's land area (CPP H-18(a)).³ Maple Valley's land capacity analysis anticipates that Residential zones will largely accommodate housing affordable to households above 120 percent of AMI, with some capacity for accessory dwelling units (ADUs). Per the plan, ADUs could be affordable to households between 0 to 80 percent of AMI. Yet, the plan predicts only 42 ADUs will develop during the planning period (Housing Technical Appendix Chapter 2, pp.3, 9-10). Moreover, the plan does not set reasonable expectations that ADUs will be affordable to low-income households because it does not include information on expected rents for ADUs or subsidies available to reduce costs (Housing Technical Appendix, Chapter 1, pp. 18).
2. Maple Valley conducted a thorough, thoughtful, and community-informed racially disparate impact analysis that includes documentation of the local history of racially exclusive and discriminatory land use and housing practices and a segregation analysis. The segregation analysis finds no notable segregation within Maple Valley, but notes that "its demographics are fairly exclusive compared to the region" (Housing Technical Appendix, Chapter 1, pp.22). The plan's historical documentation concludes "single-family zoning patterns...generally made housing in the city less accessible to people of color" and that "[a]ffordability seems to be the main barrier to reducing racially disparate impacts in the city today" (Housing Technical Appendix, Chapter 1, pp.21). This analysis and acknowledgement is an important first step for Maple Valley in a process to repair harm to people of color caused by exclusive zoning patterns. The City is also taking steps to allow more access to the jurisdiction as a whole by adding additional low-rise housing capacity in the jurisdiction. However, the proposed plan does not appear to meaningfully take "intentional, targeted action" to address the stated exclusivity and unaffordability of single-family areas specifically, the majority of which are zoned Residential (CPP H-9).
3. The plan appears to place disproportionate environmental and health burdens—specifically exposure to heavy automobile traffic, air pollutants, and noise—on the City's future low-income residents (CPP H-25). This is because the plan proposes to accommodate the majority of its 0 to 80 housing needs in areas adjacent to State Route 169, a major arterial. Moreover, Community Business zones, where the plan proposes to accommodate over half of the City's 0 to 80 percent of AMI housing needs, allow for a "broad range of commercial uses...including those which typically...generate noise and traffic impacts as a part of their operations" (Land Use Element, pp.6). Maple Valley's zoning code includes provisions which aim to limit exposure to pollutants and noise.⁵ The City is also taking significant steps to transform the Downtown area into a "walkable, attractive, and economically vibrant mixed-use center in the heart of the City, with multimodal connectivity in all four directions" (Land Use Element, pp.6).⁵ The AHC remains concerned, however, that future low-income housing

³ Puget Sound Regional Council. Opportunity Mapping. [\[link\]](#)

⁴ Per Maple Valley staff, provisions include setback and landscaping requirements along right of ways. An existing noise ordinance limits the amount of noise that commercial operations may generate from the hours of 10 a.m. to 7 a.m. on weekdays and 10 p.m. to 8 a.m. on weekends.

⁵ Per Maple Valley staff, new design standards aim to create a high-quality urban environment in Downtown zones. Future redevelopment of the Legacy Site adjacent to Downtown may also bring public space, recreation, and gathering places for future residents.

development will be limited to areas with relatively more exposure to pollutants and noise than current Residential zones.

Recommendation 4: To align with CPPs H-9, H-18(a), and H-24, Maple Valley should include additional or revised policies and/or implementation strategies that increase housing options for 0 to 80 percent of AMI households “throughout the jurisdiction” (CPP H-18), particularly in Residential zones. Increasing access does not necessarily mean Maple Valley needs to allow midrise multifamily housing in all Residential zones. Any land use capacity changes should be consistent with county and regional requirements. For examples of strategies Maple Valley could use to align with the CPPs, see Table H-3 in the CPP Housing Chapter Technical Appendix.

5. Complete the housing inventory and analysis (CPP H-3)

Relevant Countywide Planning Policies

CPP H-3 requires all jurisdictions to conduct a housing inventory and analysis to help identify and address the greatest needs as well as summarize the findings in the Housing Element.

Maple Valley’s Proposal and AHC Findings

While Maple Valley’s submission includes many data points and substantive analysis, the AHC could not find the specific information required by H-3(h), and incomplete information required by H-3(f). This includes:

- f. Household characteristics, by race/ethnicity; and
- h. Projected population growth.

Maple Valley’s Housing Element Technical Appendix lacks data on projected population growth. If this data is presented elsewhere in the plan, Maple Valley should note it accordingly. Also, Maple Valley provides data on median income using the categories “White alone, not Hispanic” and “BIPOC overall,” rather than disaggregating data by race and ethnicity (Housing Technical Appendix, Chapter 1, pp.13). Races and ethnicities that fall within the BIPOC category likely do not have the same economic characteristics. This information should be disaggregated to accurately represent Maple Valley’s community. Maple Valley should describe any statistical limitations or other reasons to not disaggregate this data, if relevant.

Recommendation 5: Maple Valley should include all inventory and analysis components as required by CPP H-3 in the comprehensive plan and summarize the findings in the Housing Element. Maple Valley should provide a rationale, such as statistical limitations, if it chooses not to include specified data points. Additional analysis should inform additional comprehensive plan policy responses and strategies.

Conclusion and AHC Resources

Thank you again for your submission to the Committee’s housing-focused comprehensive plan review program. AHC members valued the opportunity to review Maple Valley’s Draft Comprehensive Plan Elements for Public Review and related submission materials. Maple Valley’s participation in

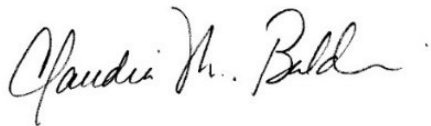
the plan review program is instrumental in the broader work of the Committee to empower local jurisdictions to address the affordable housing crisis in King County.

AHC staff are happy to assist Maple Valley in addressing these recommendations. For immediate resources and guidance on aligning with the CPP Housing Chapter, refer to the:

- [Engrossed 2021 King County CPPs](#);
- [AHC Housing-focused Draft Comprehensive Plan Review Program Guide](#);
- [King County Resources for Documenting the Local History of Racially Exclusive and Discriminatory Land Use and Housing Practices guidance](#); and
- [Countywide Planning Policies Housing Chapter Frequently Asked Questions](#).

If you have questions or need additional information regarding aligning with the CPP Housing Chapter, please contact AHC staff at AHCplanreview@kingcounty.gov.

Sincerely,



Claudia Balducci
Affordable Housing Committee Chair
King County Councilmember, District 6

CC Dow Constantine
Growth Management Planning Council Chair
King County Executive

Laura Hodgson
Washington State Department of Commerce, Senior Planner

Plan Review Team
King County Affordable Housing Committee

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Puget Sound Regional Council

Exhibit 3: Draft Comment Letter for the City of Algona

Jessica Griess, City Administrator
City of Algona
200 Washington Blvd,
Algona, WA 98001

Dear Ms. Griess,

Thank you for submitting the City of Algona's draft comprehensive plan to the Affordable Housing Committee (AHC) for review on March 11, 2024. On behalf of the AHC, I am sending you this summary of our review and recommendations.

Background

The AHC is a subcommittee of the Growth Management Planning Council (GMPC), consisting of representatives of King County and its cities, housing providers, area employers, and others. By direction of the GMPC, the AHC now conducts a housing-focused review of all King County jurisdictions' draft periodic comprehensive plan updates, assessing the draft plans for alignment with the [King County Countywide Planning Policies](#) (CPP) Housing Chapter goals and policies prior to plan adoption.

As you know, our county is experiencing a deep and persistent housing shortage. In 2021 the State of Washington adopted [House Bill 1220](#), which amended the Growth Management Act, requiring local governments to plan for and accommodate housing that is affordable to all income levels, including emergency housing. In response to this state mandate and local interest in improving the effectiveness of local housing plans and policies, the AHC led a two-year process to amend the King County CPPs.

The result was a significant update to the CPP Housing Chapter, which was recommended by the GMPC, adopted by the King County Council, and ratified by the cities in 2023. The goals of both the statute and this implementation work are to encourage cities and King County to work together to provide a full range of affordable, accessible, healthy, and safe housing choices to every resident in King County.

This review is guided by Housing-Focused Comprehensive Plan Review Standards, as adopted by [GMPC Motion 23-2](#). In summary, the AHC review seeks to determine whether each jurisdiction's draft plan and submission materials:

1. Address all CPP Housing Chapter policies;
2. Articulate implementation strategies for relevant CPP Housing Chapter Policies; and
3. Lay out meaningful policies that, taken together, support the jurisdiction's ability to equitably meet housing needs.

AHC members appreciate Algona being one of the first jurisdictions to submit to the program in 2024. This program is still relatively new and evolving, and your engagement helps the AHC understand how jurisdictions are seeking to address their housing needs while aligning with the recent changes at the state, regional, and county levels.

The AHC acknowledges the substantial amount of time and effort that went into Algona's draft comprehensive plan. During review, the AHC noted that many of Algona's plans, policies, analyses, and implementation strategies align well with CPP Housing Chapter policies. In particular, Algona's

implementation strategy to join South King Housing and Homelessness Partners (SKHHP) would promote subregional collaboration to increase housing stability and produce and preserve quality affordable housing in South King County.

Below, the AHC includes recommendations necessary for Algona to align with the CPP Housing Chapter policies.

Recommendations to Align with the CPP Housing Chapter

The AHC recommends Algona take the following actions to align its draft comprehensive plan with CPP Housing Chapter goals and policies.

1. Remove potential barriers to middle housing, transitional, supportive, and emergency housing (CPPs H-1, H-13, H-18, H-19, and H-22)

Relevant Countywide Planning Policies

CPP H-1 requires Algona plan for a net new need of 170 permanent housing units at varying income levels and 32 emergency housing beds. CPP H-13 requires all jurisdictions implement strategies to overcome cost barriers to housing affordability. CPP H-18 requires all jurisdictions adopt inclusive planning tools and policies that increase the ability of all residents in jurisdictions throughout King 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. CPP H-19 requires all jurisdictions lower barriers to and promote access to affordable homeownership, emphasizing: a) opportunities affordable to households with incomes at or below 80 percent area median income (AMI) and b) remedying historical inequities in and expanding access to homeownership opportunities for Black, Indigenous, and People of Color (BIPOC) communities. Finally, CPP H-22 requires all jurisdictions to 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.

Algona's Proposal and AHC Findings

Algona's proposed Housing Element policy HU-2.4 states that Algona will expressly permit middle housing types in its code for all residential areas. This is an important step to increase housing supply overall and create more housing choice throughout Algona. However, proposed Housing Element policy HU-1.4 states that Algona should maintain "the scale and form of buildings in residential neighborhoods." This differs from RCW 36.70a.030(26), as amended by 2023 House Bill 1110, which defines middle housing as "buildings that are *compatible* [emphasis added] in scale, form, and character with single-family houses..."¹

Depending on how policy HU-1.4 is interpreted, "maintaining" the same scale and form of existing structures, which are predominantly one- or two-story single-family houses, could limit new construction and significantly chill the development of middle housing types, particularly in Algona's mixed-use zone. Additionally, Algona's racially disparate impact analysis states the "prevalence of Algona's single-family, owner-occupied housing stock and its associated price points may contribute to the exclusion of BIPOC homeowners." (Chapter 3: Housing Element, pp.23). Middle housing is one of the housing types most likely to provide more affordable homeownership opportunities, and the AHC finds that imposing an unnecessary barrier on that housing type would be out of alignment with CPP H-19.

¹ RCW 36.70a.030(26) (2023). [\[link\]](#)

Algona’s proposed Housing Element policy HU-2.6 states that Algona will support the development of transitional, supportive, and emergency housing types, “but continue to prevent impacts to neighboring uses and residents from sound, light, odor, visual or other environmental impacts.” Depending on how this policy is interpreted, if a proposed housing project would have any impact on neighboring uses, such as casting a shadow on part of a neighboring parcel, policy HU-2.6 could prevent it from moving forward.

Both policies HU-1.4 and HU-2.6 could have unintended consequences, such as additional development costs (CPP H-13) and could limit improving housing choice and opportunity throughout Algona (CPPs H-18, H-22). Without addressing these potential barriers, the AHC does not believe Algona’s plan will meaningfully plan for and accommodate its housing needs (CPP H-1).

Recommendation 1: To align with CPPs H-1, H-13, H-18, H-19, and H-22 Algona should amend policies HU-1.4 and HU-2.6 to ensure that Algona is meaningfully planning for and accommodating middle, transitional, supportive, and emergency housing types. For example, Algona could remove “the scale and form of buildings” from policy HU-1.4 and replace “prevent” with “mitigate” in policy HU-2.6.

2. Complete the housing inventory and analysis (CPP H-3)

Relevant Countywide Planning Policies

CPP H-3 directs jurisdictions to conduct a housing inventory and analysis to help identify and address the greatest needs as well as summarize the findings in the Housing Element.

Algona’s Proposal and AHC Findings

While Algona’s submission includes many data points and substantive analysis, the AHC could not find specific information required by H-3(d), (g), and (k). This includes:

- d) percentage and geographic distribution of residential land zoned for moderate- and high-density housing and accessory dwelling units in the jurisdiction;
- g) current population characteristics expressed by age by race/ethnicity; and
- a) summary of existing and proposed partnerships and strategies, including dedicated resources, for meeting housing needs, particularly for populations disparately impacted.

This additional analysis should inform additional comprehensive plan policy responses and strategies. For example, analysis responsive to CPP H-3(k) could help inform the analysis of gaps and barriers in existing policies and strategies, as required by CPP H-4.

Recommendation 2: Algona should include all inventory and analysis components as required by H-3 in the comprehensive plan and summarize the findings in the Housing Element. This additional analysis should inform additional comprehensive plan policy responses and strategies.

3. Identify gaps in existing partnerships, policies, and dedicated resources (CPP H-4)

Relevant Countywide Planning Policies

CPP H-4 requires all jurisdictions to identify gaps in existing partnerships, policies, and dedicated resources for meeting housing needs and eliminating racial and other disparities in access to housing and neighborhoods of choice.

Algona's Proposal and AHC Findings

While Algona's Gap Analysis (Housing Needs Assessment, pp.32-36) evaluated the affordability gap of the jurisdiction's housing supply with their allocated need, the AHC did not find an identification of gaps in partnerships, policies, or dedicated resources. This identification and evaluation is meant to inform the housing chapter's policies and strategies.

Recommendation 3: To align with CPP H-4, Algona should identify gaps in existing partnerships, policies, and dedicated resources for meeting housing needs and eliminating disparities. This additional analysis should inform additional comprehensive plan policy responses and strategies.

4. Address potential segregation and negative environmental health impacts for low-income households (CPPs H-18 and H-25)

Relevant Countywide Planning Policies

CPP H-18 requires jurisdictions adopt inclusive planning tools and policies that increase the ability of all residents in jurisdictions throughout King 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. CPP H-25 requires jurisdictions plan for residential neighborhoods that protect and promote the health and well-being of residents by supporting equitable access to resources and amenities, and by avoiding or mitigating exposure to environmental hazards and pollutants.

Algona's Proposal and AHC Findings

Algona's draft comprehensive plan proposes accommodating all of its midrise housing in the city's Heavy Commercial "C-3" zone (Housing Element Figure 25, pp.33). Algona's analysis assumes that midrise housing is the only housing type providing capacity for housing serving the needs of households with incomes at or below 50 percent AMI (Housing Element Figure 26, pp.34). The AHC finds that Algona's land use pattern does not meaningfully provide access to affordable housing throughout the jurisdiction (CPP H-18(a)) or plan for residential neighborhoods that protect and promote the health and well-being of residents (CPP H-25).

Specifically, the AHC notes that:

1. The C-3 zone is a strip of parcels adjacent to State Route 167 geographically separated from the rest of Algona, only accessible by crossing underneath State Route 167 on 1st Avenue North, via road or sidewalk. The AHC finds that this degree of geographic segregation amounts to a pattern of exclusion (CPP H-18). This could also perpetuate racial segregation as BIPOC households are more likely to be renters than White households (Housing Technical Appendix, pp.25), and thus more likely to live in areas zoned for midrise housing.
2. The draft plan appears to place disproportionate environmental health burdens on residents within the C-3 zone (CPP H-25). In addition to being adjacent to State Route 167, the C-3 zone includes both an existing waste transfer station, and a new recycling and waste transfer

station that is currently under construction, slated to replace the former station in 2026.² While the new transfer station has design features aimed at addressing nuisances, potential burdens from the transfer station could include noise, odors, and transportation impacts.³ The South County Recycling and Transfer Station Project’s Environmental Impact Statement did not explore impacts to future multifamily housing, but it does state that “[a]n industrial land use would be most compatible with a transfer station. The least compatible land uses would be residential land...”⁴ The combination of being located near a major highway, which can increase exposure to noise and air pollution, and near a new recycling and waste transfer station, poses potential environmental health hazards to nearby residents.⁵

Algona’s draft plan includes multiple policies and strategies that seek to address potential issues from residential development in the C-3 zone. Algona’s comprehensive planning consultant informed AHC staff that their draft Natural Environment Element policy NE-2.6 directs Algona to “ensure all residents...have a clean and healthy environment” and “identify, mitigate, and correct for unavoidable negative impacts.” Algona also plans to site a new park and develop a trail network in this zone. These efforts will promote the health and well-being of Algona residents and are aligned with CPP H-25.

Furthermore, Algona’s proposed Housing Element policy HU-2.1 states that Algona will “evaluate the adoption of zoning regulations that would allow multi-family residential developments that are income-restricted to those at or below 60 percent of the area median income for at least fifty years to be located in zoning districts other than multifamily residential. Development incentives should be prioritized to encourage higher-density housing, including middle housing.” Adopting zoning regulations outlined in policy HU-2.1 would help ensure greater access to housing affordable to households at or below 50 percent of AMI throughout the jurisdiction. However, the AHC finds that only “evaluating” the adoption of these zoning regulations, rather than committing to making the proposed changes, is not sufficient to increase housing choice throughout the jurisdiction.

Recommendation 4: To align with CPPs H-18 and H-25, Algona should adopt the zoning regulations outlined in policy HU-2.1 or include additional policies and implementation strategies to ensure Algona plans for and accommodates housing types most likely to serve 0 to 50 percent AMI households throughout the jurisdiction and in areas that promote the health and well-being of residents. Algona may submit an implementation strategy to the AHC to implement the zoning regulations outlined in policy HU-2.1 after adoption of its comprehensive plan.

5. Take targeted actions to repair harms to BIPOC households (CPP H-9)

Relevant Countywide Planning Policies

CPP H-9 requires jurisdictions to adopt intentional, targeted actions that repair harms to BIPOC households from identified past and current racially exclusive and discriminatory land use and housing practices.

² King County Solid Waste Facilities. *South County Recycling and Transfer Station Project* [\[link\]](#)

³ King County Solid Waste Division. (2017, January). *South County Recycling and Transfer Station, Equity Impact Review* [\[link\]](#)

⁴ King County Solid Waste Division. (2016, September). Chapter 3: *Affected Environment, Environmental Impacts, Mitigation Measures, and Significant Unavoidable Adverse Impacts*. Page 3.9-5 [\[link\]](#)

⁵ Samuels, G., Freemark, Y. (2022). *The Polluted Life Near the Highway*. Urban Institute [\[link\]](#)

Algona's Proposal and AHC Findings

The Housing Equity section of Algona's draft Housing Element includes substantive new analysis and represents a good faith effort to align with new state and county policies regarding racially disparate impacts. Algona's Housing Element states that Black or African American and Hispanic or Latin(a)(o)(x) households are more likely to be renters than White and Asian households (Housing Element, pp.12). Within renter households, BIPOC residents are disproportionately cost-burdened (Housing Element, pp.16). While Algona's housing policies do outline strategies to promote housing stability and affordability, such as Housing Element policy HU-5.5, there is not a clear connection between the findings from the Racially Disparate Impact analysis and Algona's policies and strategies.

Recommendation 5: To align with CPP H-9, Algona should clarify how it is adopting targeted actions to repair harms identified through their Racially Disparate Impact analysis.

Conclusion and AHC Resources

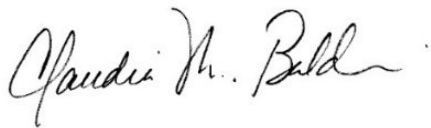
Thank you again for your submission to the Committee's housing-focused comprehensive plan review program. AHC members valued the opportunity to review Algona's Draft Comprehensive Plan Elements for Public Review and related submission materials. Algona's participation in the plan review program is instrumental in the broader work of the Committee to empower local jurisdictions to address the affordable housing crisis in King County.

AHC staff are happy to assist Algona in addressing these recommendations. For immediate resources and guidance on aligning with the CPP Housing Chapter, refer to the:

- [Engrossed 2021 King County CPPs](#);
- [AHC Housing-focused Draft Comprehensive Plan Review Program Guide](#);
- [King County Resources for Documenting the Local History of Racially Exclusive and Discriminatory Land Use and Housing Practices](#); and
- [Countywide Planning Policies Housing Chapter Frequently Asked Questions](#).

If you have questions or need additional information regarding aligning with the CPP Housing Chapter, please contact lead staff for the AHC plan review program, Isaac Horwith, at AHCplanreview@kingcounty.gov or at 206-477-7813.

Sincerely,



Claudia Balducci
Affordable Housing Committee Chair
King County Councilmember, District 6

CC Dow Constantine
Growth Management Planning Council Chair
King County Executive

Andy McAndrews
ATWELL, LLC, Associate Director

Laura Hodgson
Washington State Department of Commerce, Senior Planner

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