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Mayor Bruce Harrell*

May 20, 2024

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, 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...”<sup>1</sup>

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

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<sup>1</sup> RCW 36.70a.030(26) (2023). [[link](#)]

AHC finds that imposing an unnecessary barrier on that housing type would be out of alignment with CPP H-19.

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
- k) 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, 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 1<sup>st</sup> 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.<sup>2</sup> 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.<sup>3</sup> 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...”<sup>4</sup> 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.<sup>5</sup>

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.

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

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

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

<sup>5</sup> 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

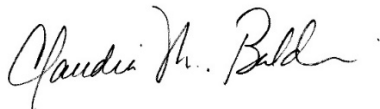
Thank you again for your submission to the Committee's housing-focused comprehensive plan review program. AHC members valued the opportunity to review Algona's Draft Comprehensive Plan Elements for Public Review and related submission materials. Algona's participation in the plan review program is instrumental 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](mailto:AHCplanreview@kingcounty.gov) or at 206-477-7813.

Sincerely,



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