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July 23, 2024

Mr. Josh Steiner, Senior Planner
City of Auburn
25 W Main St,
Auburn, WA 98001

Dear Mr. Steiner,

Thank you for submitting the City of Auburn's draft comprehensive plan to the Affordable Housing Committee's (AHC) Housing-focused Draft Comprehensive Plan Review Program for review on April 10, 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 Auburn being among 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 Auburn’s draft comprehensive plan. During review, the AHC noted that many of Auburn’s plans, policies, analyses, and implementation strategies align well with CPP Housing Chapter policies. In particular,

1. Auburn’s draft proposes substantially increasing Auburn’s development capacity from 7,504 units under existing zoning to 46,070. Most of this increase comes from allowing middle housing and expanding their Regional Growth Center and Downtown Center to accommodate greater densities of housing. This strategy will help accommodate households with incomes greater than 80 percent area median income (AMI), which represent over 70 percent of Auburn’s overall housing need in King County.
2. Auburn’s “Goal 6: Implementation and Monitoring” represents a strong commitment to partner with a broad set of organizations to meeting countywide housing needs. The AHC also recognizes and appreciates that Auburn serves as the administering agency of South King Housing and Homelessness Partners, which promotes subregional collaboration to increase housing stability and produce and preserve quality affordable housing in South King County.

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

Recommendations to Align with the CPP Housing Chapter

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

1. Plan for and accommodate Auburn’s allocated housing needs (CPP H-1)

Relevant Countywide Planning Policies

CPP H-1 requires Auburn plan for and accommodate at total of 12,000 net new housing units affordable to households at different income levels, including 812 permanent supportive housing units. and 2,293 new emergency housing beds.

Auburn’s Proposal and AHC Findings

Auburn’s draft Housing element narrative discusses Auburn’s permanent supportive and emergency housing needs, identifying a “severe shortage of emergency housing beds” and a need to supply an additional 115 beds per year to meet the need by 2044 (page HE-11). Auburn’s submission also includes policies that will likely support development of these housing types. However, the AHC does not see a policy that explicitly states Auburn’s intent to plan for and accommodate permanent supportive housing and emergency housing types.

Auburn’s draft Housing element’s land capacity analysis uses the housing needs allocated in CPP H-1, indicating Auburn intends to provide sufficient residential capacity for its allocated housing needs. Auburn’s proposed policy H-32 also commits Auburn to work in partnership with King and Pierce County and other cities to address countywide housing needs for all income levels, and “act as a County leader in the exploration and implementation of new funding mechanisms and strategies to develop housing affordable at 30 percent [area median income] AMI and below.” The AHC commends Auburn for the commitment to partnership and acting as a leader to meet housing needs for households with incomes at or below 30 percent AMI. However, demonstrating sufficient residential capacity and addressing countywide housing needs does not clearly demonstrate that Auburn intends to plan for and accommodate its allocated housing needs.

Recommendation 1: To align with CPP H-1, Auburn should adopt a policy stating their intent to plan for and accommodate its allocated share of countywide future housing needs for moderate-, low-, very low-, and extremely low-income households as well as emergency housing and permanent supportive housing.

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.

Auburn's Proposal and AHC Findings

While Auburn's submission includes many data points and substantive analysis, the AHC could not find specific information required by H-3(d), (e), (g), (i), 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;
- 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) age by race/ethnicity;
- i) housing development capacity within a half-mile walkshed of high-capacity or frequent transit service, if applicable; 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: Auburn 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. List and evaluate existing housing policies, strategies, and gaps and plan to address them (CPPs H-3(k), H-4, H-12, and H-20)

Relevant Countywide Planning Policies

CPP H-3(k) requires all jurisdictions to include in their inventory and analysis a summary of existing and proposed partnerships and strategies, including dedicated resources, for meeting housing needs, particularly for populations disparately impacted. CPP H-4 requires jurisdictions to evaluate the effectiveness of existing housing policies and strategies to meet the jurisdiction's housing needs and eliminating racial and other disparities in access to housing and neighborhoods of choice. CPP H-12 requires jurisdictions to adopt and implement policies that improve the effectiveness of existing housing policies and strategies and address gaps in partnerships, policies, and dedicated resources

to meet the jurisdiction’s housing needs. CPP H-20 requires jurisdictions to adopt and implement policies that address gaps in partnerships, policies, and dedicated resources to eliminate racial and other disparities in access to housing and neighborhoods of choice.

Auburn’s Proposal and AHC Findings

Auburn’s Housing Element Goal 6 proposes multiple policies to continue and pursue partnerships with many different organizations. The AHC commends these efforts and believes Auburn will continue to collaborate with diverse partners, in alignment with CPP H-6. However, the AHC did not find a summary of existing partnerships and strategies or an evaluation of the effectiveness of policies and strategies, as required by CPPs H-3(k) and H-4. While Auburn’s proposed policies may address gaps in partnerships, policies, or dedicated resources, the AHC cannot determine if Auburn is aligned with CPPs H-12 and H-20 without this analysis.

Recommendation 3: To align with CPPs H-3(k), H-4, H-12, and H-20, Auburn should list existing partnerships and strategies and identify gaps in existing partnerships, policies, and dedicated resources for meeting housing needs and eliminating disparities. Please see the Washington State Department of Commerce’s [“Adequate Provisions Checklists”](#) as a guide for how Auburn could conduct this analysis. Auburn should use this analysis to address those gaps and improve effectiveness of existing policies and strategies.

4. Document racially exclusive and discriminatory land use and housing practices and adopt intentional, targeted actions to repair harm (CPPs H-5 and H-9)

Relevant Countywide Planning Policies

CPP H-5 requires jurisdictions to document the local history and impact of racially exclusive and discriminatory land use and housing practices and explain the extent to which that history is still reflected in current development patterns, housing conditions, tenure, and access to opportunity. CPP H-9 requires jurisdictions to adopt intentional, targeted actions that repair harms to Black, Indigenous, and People of Color (BIPOC) households from identified past and current racially exclusive and discriminatory land use and housing practices.

Auburn’s Proposal and AHC Findings

The Racially Disparate Impact analysis in Auburn’s draft Housing element identifies racial disparities in housing cost burden and displacement risk among its residents (Housing Element page HE-7). While these disparities are critical to understanding Auburn’s housing needs, Auburn’s submission does not document the history of racially exclusive and discriminatory land use and housing practices in Auburn, as required by CPP H-5. For example, many properties in Auburn had or have racially restrictive covenants.¹

Auburn’s proposed land use map represents a major step toward eliminating exclusionary zoning. Auburn’s draft plan also includes many policies that will likely benefit BIPOC households, including anti-displacement measures and inclusive engagement practices that are closely aligned with the strategies the CPP Housing Chapter Technical Appendix suggests for CPP H-9. However, without the analysis required by CPP H-5, the AHC cannot determine if these actions are a “targeted” approach to repairing harm from the racially exclusive and discriminatory land use and housing practices.

¹ The University of Washington. (2020). *Racial Restrictive Covenants*. The Seattle Civil Rights & Labor History Project. [\[link\]](#)

Additionally, while Auburn’s proposed policy LU-12 does explicitly mention historically marginalized communities, it only “encourages” inclusive engagement strategies to prevent negative impacts.

Recommendation 4: To align with CPP H-5, Auburn should document the history of racially exclusive and discriminatory land use and housing practices within their jurisdiction and explain the extent to which the history is still reflected in current development patterns, housing conditions, tenure, and access to opportunity. See “Resources for Documenting the Local History of Racially Exclusive and Discriminatory Land Use and Housing Practices” document for assistance.²

To align with CPP H-9, Auburn should adopt or clarify how proposed actions are targeted to repair harms identified in their Racially Disparate Impacts analysis.

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

Relevant Countywide Planning Policies

CPP H-8 requires all jurisdictions to collaborate with and prioritize the solutions articulated by populations most disproportionately impacted by housing cost burden in developing, implementing, and monitoring strategies that achieve the goals of this chapter.

Auburn’s Proposal and AHC Findings

Auburn’s draft Housing element includes policy H-41, which very closely matches the language of CPP H-8. Auburn’s Public Participation Plan also outlines numerous engagement strategies used to reach different populations and community-based organizations in an inclusive manner and provides findings from their community engagement process. However, the findings section does not identify specific input or themes from populations most disproportionately impacted by housing cost burden. Without this information, the AHC cannot determine if Auburn is prioritizing the needs identified by these communities.

Recommendation 5: To align with CPP H-8, Auburn should disaggregate input from community engagement and clarify how the plan prioritizes the needs of populations disproportionately impacted by housing cost burden.

6. Adjust affordability assumptions for accessory dwelling units (CPP H-11)

Relevant Countywide Planning Policies

CPP H-11 requires jurisdictions identify sufficient capacity of land for housing including housing for low-, very low-, and extremely low-income households.

Auburn’s Proposal and AHC Findings

Auburn’s draft plan proposes significantly increasing where accessory dwelling units (ADUs) are allowed, in alignment with recent state legislation. The AHC appreciates Auburn’s steps to allow more ADUs as a method of increasing housing diversity and options within traditionally single-family areas. However, Auburn’s initial submission to the AHC assumed ADUs would be affordable to households

² King County Affordable Housing Committee. (2024) *Resources for Documenting the Local History of Racially Exclusive and Discriminatory Land Use and Housing Practices*. [\[link\]](#)

with incomes at or below 30 percent AMI.³ Auburn staff sent updated materials that assumed ADUs would be affordable to households at or above 60 percent of AMI after a discussion with AHC staff.⁴ However, the AHC does not consider ADUs as a meaningful strategy to address housing needs below 80 percent of AMI in King County communities, which have relatively higher housing costs compared to the rest of the state.

Recommendation 6: To align with CPP H-11, Auburn should update their land capacity analysis to either:

- assume ADUs provide capacity for households above 80 percent of AMI, in alignment with Exhibit 13 in the Department of Commerce’s land capacity analysis guidance,⁵
- provide evidence in a detailed market analysis that ADUs are affordable to low-income households, or
- propose subsidies or development incentives that set a reasonable expectation that ADUs would be affordable to low-income households.

This update should inform and be consistent throughout Auburn’s Housing Needs & Characteristics Assessment and Housing and Land Use elements.

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 Auburn’s submission. Auburn’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 Auburn 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](#); and
- [King County Resources for Documenting the Local History of Racially Exclusive and Discriminatory Land Use and Housing Practices](#).

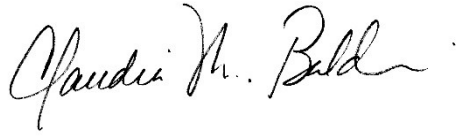
If you have questions or need additional information regarding aligning with the CPP Housing Chapter, please contact lead staff for the AHC plan review program, Isaac Horwith, at AHCplanreview@kingcounty.gov or at 206-477-7813.

³ Auburn Housing Needs & Characteristics Assessment Draft April 9, 2024. Figures 53 and 56.

⁴ Auburn Housing Element Draft May 31, 2024. Table 1.

⁵ Department of Commerce (2023, August). *Guidance for Updating Your Housing Element*. Chapter 3: Land Capacity Analysis. Page 33. [\[link\]](#)

Sincerely,

A handwritten signature in black ink that reads "Claudia M. Balducci". The signature is written in a cursive style with a small dot at the end.

Claudia Balducci
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King County Councilmember, District 6

CC Dow Constantine
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