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Mayor Bruce Harrell*

July 23, 2024

Ms. Hannah Bahnmitter
Senior Affordable Housing Planner
City of Bellevue
450 110th Ave Northeast
Bellevue, WA 98004

Dear Ms. Bahnmitter,

Thank you for submitting a working draft of Bellevue's 2044 Comprehensive Plan to the Affordable Housing Committee (AHC) for review on March 8, 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 develop and recommend amendments 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 House Bill 1220 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](#). 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.

As one of five Puget Sound Regional Council (PSRC)-designated Metropolitan Cities, Bellevue serves as a focal point for accommodating both population and employment growth due to its convenient access to high-capacity transit and role as a civic, cultural, and economic hub. Bellevue's planned job and housing growth, and the sheer number of low-income households Bellevue must plan for and accommodate over the next 20 years

underscores the importance of the AHC’s review of Bellevue’s comprehensive plan. As with all plans, the AHC reviewed this plan with an eye towards ensuring Bellevue’s housing-related policies support a range of affordable, accessible, healthy, and safe housing choices for current and future residents across King County and respond to the legacy of discriminatory housing and land use policies and practices (e.g., racially restrictive covenants, exclusionary zoning, etc.) that have led to significant racial and economic disparities in access to housing and neighborhoods of choice consistent with the CPP Housing Chapter goals and policies.

AHC members appreciate Bellevue 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 Bellevue’s draft comprehensive plan. Bellevue’s submission reflects years of efforts to understand and address Bellevue’s housing needs, which has resulted in deep analysis, strong policies, and detailed implementation strategies. During review, the AHC noted that many of Bellevue’s plans, policies, analyses, and implementation strategies align well with CPP Housing Chapter policies. In particular:

1. Bellevue is proposing more residential density to maximize the benefits of the new East Link light rail expansion, particularly in the Wilburton neighborhood.
2. Bellevue’s active collaboration with diverse partners such as A Regional Coalition for Housing (ARCH), housing developers and providers, employers, educational institutions, religious organizations, and philanthropy have resulted in detailed policies and implementation strategies that identify partners and help lay the foundation for future affordable housing development.

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

Recommendations to Align with the CPP Housing Chapter

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

- 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).

Bellevue’s Proposal and AHC Findings

Bellevue’s submission to the AHC identifies many policies and implementation strategies as responsive to CPP H-2. While the policies and programs Bellevue identified will likely serve and benefit households with incomes less than or equal to 30 percent of AMI, the AHC did not identify a policy or implementation strategy that explicitly *prioritizes* the housing needs of these households.

Bellevue’s proposed Housing element policy HO-48 directs the city to meet housing needs “especially in areas of highest need,” and proposed policies HO-65 and HO-66 seek to support the

housing needs for people exiting homelessness.¹ These policies are in alignment with the CPP Housing Chapter, but don't necessarily capture all 0 to 30 percent AMI households. Bellevue also identified its Housing Stability Program as responsive to CPP H-2, but the plan and submission materials lacked detail on how or if this program will prioritize the housing needs of Bellevue's lowest income households in the future.

Recommendation 1: To align with CPP H-2, Bellevue 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. For examples of strategies jurisdictions could use to align with CPP H-2, see the CPP Housing Chapter Technical Appendix.

2. Include all required inventory and analysis in Bellevue's adopted comprehensive plan (CPPs H-3, H-4, H-5, and H-11)

Relevant Countywide Planning Policies

The CPP Housing Chapter includes several policies that require jurisdictions to include housing inventory and analysis in its comprehensive plan. 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. 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. CPP H-5 requires jurisdictions to document the local history and impact of racially exclusive and discriminatory land use and housing practices. CPP H-11 directs jurisdictions to identify sufficient capacity of land for housing for a variety of housing types.

Bellevue's Proposal and AHC Findings

Bellevue's submission included hundreds of pages of substantive housing-related analysis in an environmental impact statement, a 2022 Housing Needs Assessment, the draft Housing element narrative, and in a supplemental document prepared specifically for the AHC. The AHC appreciates Bellevue's substantive analysis and efforts to ensure all the inventory and analysis requirements of the CPPs were met. However, it is not clear if all the documents submitted to the AHC will be included as part of the adopted periodic update to the comprehensive plan.

Recommendation 2: To align with CPPs H-3, H-4, H-5, and H-11, Bellevue should include all required analyses in the adopted comprehensive plan. The information can be included as an appendix to the comprehensive plan, with a summary of findings in the plan itself.

¹ The draft Bellevue comprehensive plan policies cited in this letter reference a March 8, 2024 version of the draft plan. The policy numbering differs slightly from the public review draft plan released on May 2, 2024. For example, policy HO-48 referenced in this letter is numbered HO-49 in the May 2 version of the plan.

3. Adopt inclusive planning tools alongside increases in residential density, particularly in areas of high opportunity (CPPs H-8 and H-18(c))

Relevant Countywide Planning Policies

CPP H-8 requires jurisdictions to collaborate with and prioritize the needs and solutions articulated by populations most disproportionately impacted by housing cost burden. CPP H-18(c) requires jurisdictions evaluate the feasibility of, and implement, where appropriate, inclusionary and incentive zoning to provide affordable housing.

Bellevue’s Proposal and AHC Findings

Bellevue’s preferred alternative land use map proposes significant increases in residential density, particularly in areas around some of the new light rail stations. Bellevue’s proposed Housing element policy HO-34 directs the city to “explore opportunities to require or incentivize affordable housing when increases to development capacity are made.” If Bellevue increases residential development before or without adopting an inclusionary housing policy, market rate development could occur, representing a significant missed opportunity to create affordable housing units. Based on Bellevue’s submission, the AHC believes “exploring opportunities” for inclusionary housing is not a meaningful action, and that committing to implementing a mandatory inclusionary housing program concurrent with its proposed land use changes would be appropriate.

Bellevue’s submission includes both quantitative and qualitative analysis that support implementing a mandatory inclusionary housing program. The Bellevue Housing Economic Policy Analysis, included as part of its Final Environmental Impact Statement (FEIS), finds that mandatory inclusionary housing programs “generate a greater number of affordable units compared to voluntary programs” and “work best in markets with strong market-rate housing production” (FEIS, pp 465). The summary of the Bellevue Diversity Advantage Network Community Conversation shows that community members believe incentives are not enough, and the city should do more to mandate affordability, especially in areas of high opportunity, such as areas with high quality transit, parks and open spaces, jobs, schools, and low exposure to environmental hazards and pollutants. The AHC commends Bellevue for conducting this analysis and community engagement. The AHC finds that implementing a mandatory inclusionary housing policy would demonstrate that Bellevue is prioritizing the solutions articulated by populations most disproportionately impacted by housing cost burden, in alignment with CPP H-8.

Recommendation 3: To align with CPPs H-8 and H-18(c), Bellevue should provide a clearer statement of intent to adopt mandatory inclusionary housing provisions concurrent with the code changes to implement the comprehensive plan’s proposed increases in residential density. Additionally, Bellevue should replace “explore” in their Housing element policy HO-34 with “include, where appropriate” or equivalent.

4. Increase access to housing in historically exclusive neighborhoods (CPPs H-9, H-18(a), H-18(d), and H-20)

Relevant Countywide Planning Policies

CPP H-9 requires jurisdictions adopt intentional, targeted actions that repair harms to Black, Indigenous, and other people of color (BIPOC) households from identified 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-18(d) identifies accessory dwelling units (ADUs) as a housing type jurisdictions should allow to align with CPP H-18. Finally, CPP H-20 requires jurisdictions 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.

Bellevue's Proposal and AHC Findings

Bellevue's submission proposes four significant actions to increase housing choice in historically single-family neighborhoods by:

1. allowing and reducing barriers for accessory dwelling units;
2. allowing middle housing types;
3. facilitating development of affordable housing on properties owned by faith-based organizations; and
4. increasing density in Neighborhood Centers.

While these strategies are commendable and will increase housing choice in low density residential areas in alignment with the CPP Housing Chapter, they will not undo past racially exclusive and discriminatory land use and housing practices, as these approaches, taken together, don't meaningfully provide access to homes affordable to households at or below 80 percent of AMI throughout Bellevue, with a focus on areas of high opportunity. Areas of high opportunity include areas in Bellevue close to parks and open space; quality jobs; clean air, water, and soil; convenient access to high capacity and frequent transit, and close to good schools, which include many areas slated to remain lower density and thus inaccessible to low-income households.

As outlined in Bellevue's Racially Disparate Impacts Analysis, historic racial restrictive covenants, and subsequent exclusionary zoning, blocked housing access to households of color. The concentration of single-family homes in specific neighborhoods further exacerbates exclusion, as their costs disproportionately affect households of color. In Bellevue, single-family homes are predominantly occupied by White and Asian households, while Black and Hispanic households primarily reside in multifamily homes (Racially Disparate Impacts Analysis, pp.1.3). This concentration not only excludes Black and Hispanic Bellevue residents but also prevents other households of color, who are overrepresented as lower income, throughout King County to reside there.

Bellevue's affordable housing capacity analysis identifies middle housing types as serving the needs of households with incomes above 120 percent AMI and accessory dwelling units as affordable to households with incomes between 80 percent and 120 percent AMI. These strategies therefore do not increase access to housing for low-income households. Additionally, Bellevue's implementation strategy related to ADUs states that it will update "standards and allow detached units in self-selected neighborhoods." The AHC is concerned that a self-selected process to allow detached ADUs could enable neighborhoods to uphold patterns of exclusion, which would not be in alignment with CPPs H-9, H-18(d), and H-20.

Bellevue's effort to support faith-based organizations to develop affordable housing is one of the best strategies to create housing that is affordable to low-income households in historically single-family neighborhoods. In 2022, Bellevue increased the allowed density at 36 locations to facilitate

development of affordable housing on faith-based properties. This notable policy approach should be complemented with additional actions to address and begin to undo racially disparate impacts, displacement, and exclusion in housing caused by Bellevue's past land use and housing policies and practices.

Table 2-4 in Bellevue's Final Environmental Impact Statement identifies an increase in residential capacity of 3,100 within the Neighborhood Centers (page 2-19). This represents about two percent of Bellevue's overall increase in housing development capacity. Additionally, Bellevue's submission states that buildings in Neighborhood Centers could be restricted to two stories, with mid-rise housing types proposed only for the Kelsey Creek Shopping Center, Lake Hills Village, and Lakemont Village Shopping Center. Although Bellevue's land capacity analysis identifies low- and mid-rise housing types as serving the needs of low-income households, mid-rise housing (typically five to eight stories) is the type most likely to serve the needs of low-income, and particularly very- and extremely low-income, households in Bellevue and would not be feasible in areas with a two-story height limit.

Taking the faith-based properties and Neighborhood Center proposals together, many of Bellevue's neighborhood areas, such as Bridle Trails, Somerset, West Lake Sammamish, Vuecrest, and Woodridge, will still have minimal parcels that would allow for mid-rise development.

Given Bellevue's important role as a Metropolitan City, its allocated housing need, and the findings from Bellevue's Racially Disparate Impact Analysis, the AHC finds that Bellevue should take further steps to meaningfully repair the harm of patterns of exclusion by increasing the ability of all residents to live in the neighborhood of their choice, reducing disparities in access to opportunity areas, and meeting the needs of the region's current and future residents by ensuring access to affordable housing throughout the city, with a focus on areas of high opportunity (CPP H-18).

Recommendation 4: To align with CPPs H-9, H-18(a), H-18(d), and H-20, Bellevue should adopt planning tools and policies to ensure all residents, including households with incomes at 0 to 30, 30 to 50, and 50 to 80 percent AMI, have access to affordable housing in the neighborhood of their choice by allowing for more mid-rise housing types in areas of high opportunity throughout Bellevue. Bellevue should also allow detached ADUs in areas beyond "self-selected neighborhoods" (implementation policy responsive to Bellevue's Housing Policy HO-19). Voluntary approaches to allowing detached ADUs enable neighborhoods to uphold patterns of exclusion inconsistent with CPPs H-9, H-18(d), and H-20.

5. Increase residential densities to maximize the benefits of new and future light rail stops (CPPs H-16 and H-17)

Relevant Countywide Planning Policies

CPP H-16 requires jurisdictions expand the supply and range of housing types, including affordable units, at densities sufficient to maximize the benefits of transit investments throughout the county. CPP H-17 requires jurisdictions support the development and preservation of income-restricted affordable housing that is within walking distance to planned or existing high-capacity and frequent transit.

Bellevue's Proposal and AHC Findings

The AHC commends Bellevue for setting an important precedent in proposing significant increases in residential density, particularly in areas around some of the new light rail stations, as outlined in

their preferred alternative land use map. Efforts to transform places like Wilburton into an urban mixed-use and walkable community close to transit and services increases residential density and economic viability of this station area. Bellevue has done a remarkable job in terms of planning for complete communities around some of Sound Transit's light rail investments, taking advantage where most feasible to propose policies and land use strategies that maximize the benefits of once-in-a-generation transit investments.

However, the Bellevue plan does not propose sufficient residential densities within walking distance of all of its light rail stations and thus limits the potential development of income-restricted affordable housing in these areas, in particular at the South Bellevue and East Main light rail stations. The AHC recognizes the unique challenges to increasing housing options near these light rail stations:

- The Mercer Slough wetland to the east of the South Bellevue station limits development in that direction, and the current single-family housing to the west has limited access to Bellevue Way SE.
- Bellevue proposed increasing residential density in the areas to the east, north, and west of the East Main light rail station. However, the low-density residential area immediately south of the station, Surrey Downs, remains the same as it is today at a residential density that can't support development of housing types King County's lowest income households can afford, presumably due to lack of community support or covenants restricting use of this land.

Nonetheless, the AHC finds that Bellevue's proposed lower residential land use designation for the areas near the South Bellevue station and parts of the East Main light rail station will not serve the needs of 0 to 80 percent AMI households and represents a missed opportunity to expand the range and supply of housing types in proximity to Sound Transit's once-in-a-lifetime investments in Bellevue.

The AHC recognizes that siting of existing light rail stations adjacent to wetlands, highways, and low-density residential neighborhoods presents development constraints that make it challenging for Bellevue to align with CPPs H-16 and H-17. Learning from these lessons, Bellevue should partner with Sound Transit to ensure future light rail stations are in areas within walking distance to employment centers and in areas with residential densities sufficient to maximize transit investments where the development and preservation of income-restricted affordable housing can occur.

Bellevue has three additional light rail stops slated to open in 2041 as part of the South Kirkland-Issaquah expansion. While Bellevue has another major periodic update to its comprehensive plan before these stops are scheduled to open, the AHC believes Bellevue should begin the process to plan for income-restricted housing near the future light rail investments, in partnership with Sound Transit, as early as possible to identify opportunities before market rate development occurs in those areas.

Recommendation 5: To align with CPPs H-16 and H-17, Bellevue should re-evaluate opportunities to increase residential densities that maximize investment of light rail at all current station areas and adopt a policy that commits to partnering with Sound Transit to locate future South Kirkland-Issaquah Link light rail stations in areas with greater housing development potential and high access to opportunity. Bellevue may submit the implementation strategy after adoption of its plan.

6. Strengthen affordable homeownership implementation strategies that increase homeownership opportunities for BIPOC communities (CPP H-19)

Relevant Countywide Planning Policies

CPP H-19 requires jurisdictions to lower barriers to and promote access to affordable homeownership, emphasizing supporting long-term affordable homeownership opportunities for households with incomes at or below 80 percent AMI and remedying historical inequities in and expanding access to homeownership opportunities for BIPOC communities.

Bellevue's Proposal and AHC Findings

Bellevue's submission includes strong policy language related to affordable homeownership and submitted nine draft implementation strategies that are responsive to CPP H-19. The implementation strategies propose strong and clear actions, such as "increasing funding" and "expanding eligibility," for programs that support existing homeowners, such as home repair, weatherization, energy efficiency grants, and tax relief. The AHC commends Bellevue for establishing these policies and implementation framework. However, the implementation strategies that are most likely to benefit new homeowners, such as downpayment assistance and zoning and code amendments to support production of new homeownership housing units, use terms such as "explore" or "consider." Due to the racial disparities among current homeowners, the AHC is concerned that Bellevue's implementation strategies will not meaningfully expand access to homeownership for BIPOC communities.

Recommendation 6: To align with CPP H-19, Bellevue should include implementation strategies that commit to expanding access to homeownership opportunities for BIPOC communities.

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 review the working draft of Bellevue's 2044 Comprehensive Plan and related submission materials. Bellevue'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.

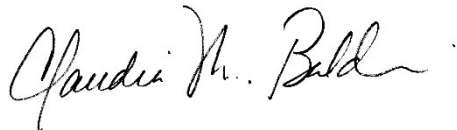
AHC staff are happy to assist Bellevue in addressing these recommendations. For immediate resources and guidance on aligning with the CPP Housing Chapter, refer to the:

- [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,



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