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October 3, 2024

Chris Pasinetti, AICP
Community Development Director
City of Enumclaw
1309 Myrtle Avenue
Enumclaw, WA 98022

Dear Mr. Pasinetti,

Thank you for submitting the City of Enumclaw's Draft 2024 Comprehensive Plan to the Affordable Housing Committee's (AHC) Housing-focused Draft Comprehensive Plan Review Program for review on July 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.

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 Enumclaw's draft comprehensive plan. During review, the AHC noted that many of Enumclaw's plans, policies, analyses, and implementation strategies align well with CPP Housing Chapter policies. In particular:

1. Enumclaw's draft plan includes a thorough and thoughtful racially disparate impact analysis, which identifies multiple, specific strategies Enumclaw could adopt to address racial disparities in cost burden and homeownership, along with the exclusiveness of the city's housing market, in strong alignment with CPP H-5.
2. The draft plan includes commitments to mitigate displacement, particularly in mobile home parks in Enumclaw (Policy LU-5.4, Housing Element Goal 4, Policy H-4.3-4). These policies and goals align well with CPP H-21.

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

Recommendations to Align with the CPP Housing Chapter

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

- 1. Adopt intentional, targeted actions to repair harm and address racially disparate impacts (CPPs H-9, H-19, and H-20)**

Relevant Countywide Planning Policies

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. CPP H-19 requires jurisdictions to lower barriers to and promote access to affordable homeownership for extremely low-, very low-, and low-income households, emphasizing remedying historical inequities in and expanding access to homeownership opportunities for BIPOC households. 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.

Enumclaw's Proposal and AHC Findings

In alignment with CPP H-5, Enumclaw's Racially Disparate Impact Report identifies racial disparities in housing cost burden and homeownership rates, as well as areas of acute displacement risk within the city (Sections 2.3.3, 2.3.5.1, and 3.2). The report also identifies a relatively low population of non-white residents in Enumclaw compared to the county as a whole (pp. 2-4). The report then identifies factors that contribute to racial disparities and a low non-white population, including racial income disparities, high housing costs, and exclusionary zoning and housing policies that limit affordable housing options. (pp.3-1-7). The report concludes with Table 5-1, which lists specific policies and regulations that Enumclaw could amend or adopt to address racially disparate impacts (pp.5.6-10).

The AHC commends Enumclaw's thorough analysis of racially disparate impacts and the inclusion of policies that could address them. However, the AHC is concerned that Enumclaw's draft plan does not meaningfully:

- adopt intentional, targeted actions that repair harms to BIPOC households from identified past and current racially exclusive and discriminatory land use and housing practices, as required by CPP H-9;

- remedy historical inequities in and expanding access to homeownership opportunities for BIPOC households, as required by CPP H-19; and
- adopt policies that address gaps in partnerships, policies, and dedicated resources to eliminate racial disparities in access to housing and neighborhoods of choice, as required by H-20.

Specifically, Enumclaw only commits to “consider” or “encourage” “many” of Table 5.1’s proposed policies. Additionally, Enumclaw does not propose to begin the work to address impacts until over five years after plan adoption (Enumclaw’s submitted Implementation Strategies Workbook).

Recommendation 1: To meaningfully address CPPs H-9, H-19, and H-20, Enumclaw should integrate policies listed in Table 5.1 of the draft plan’s Racially Disparate Impact Report into Housing and Land Use Element policies and implementation strategies. The City should also commit to “adopt” or “implement” rather than “consider” or “encourage” and plan to address identified racially disparate impacts sooner than five years from the draft plan’s adoption. Enumclaw may provide updated implementation strategies to the AHC in early 2025.

2. Adopt policies and strategies that increase the supply of income-restricted housing, fill gaps in policy effectiveness, and remove cost barriers to affordability (CPPs H-4, H-10, H-12, and H-13)

Relevant Countywide Planning Policies

CPP H-4 requires jurisdictions to evaluate the effectiveness of existing housing policies and strategies to meet the jurisdiction’s housing needs and 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-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-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-13 requires jurisdictions to implement strategies to overcome cost barriers to housing affordability.

Enumclaw's Submission and AHC Findings

In alignment with CPP H-4, Appendix B of Enumclaw’s draft plan lists barriers to low-rise housing development, which is more likely to be income-restricted and affordable to households below 80 percent of AMI than other housing types. Barriers include:

- low maximum densities or low maximum floor area ratios;
- low maximum building heights;
- design review requirements;
- permit, impact, and utility connection fees;
- the state environmental protection assessment process;

The draft plan also lists possible policy amendments that could address identified barriers, including the consideration of an incentive program for affordable housing (Policy H-2.6), fee reductions for

affordable housing projects (Policy H-2.10), and updates to streamline the permitting process (Policy H-2.11).

The AHC commends Enumclaw’s identification of strategies to remove barriers to low-rise housing construction. However, the AHC believes that Enumclaw’s commitment to “consider” these actions does not set reasonable expectations that the City will:

- adopt or implement policies and strategies that aim to increase Enumclaw’s long-term income-restricted housing stock, as required by CPP H-10;
- fill gaps in current policy and strategies to meet housing needs, as required CPP H-12; and
- address cost barriers to affordability, as required by H-13.

Recommendation 2: To meaningfully address CPPs H-10, H-12, and H-13, Enumclaw should integrate policies and strategies listed in the adequate provisions analysis into the City’s Housing Element and Land Use Element and implementation strategies. The City should commit to “adopt” or “implement” rather than “consider” or “encourage” in Housing and Land Use Element policies. Enumclaw may provide updated implementation strategies to the AHC in early 2025.

Conclusion and AHC Resources

Thank you again for your submission to the Committee’s Draft Housing-focused Draft Comprehensive Plan Review Program. AHC members valued the opportunity to review City of Enumclaw’s Draft 2024 Comprehensive Plan and related submission materials. Enumclaw’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.

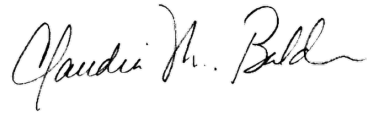
AHC staff are happy to assist Enumclaw in addressing these recommendations. For immediate resources and guidance on aligning with the CPP Housing Chapter, refer to the:

- [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](#).

The AHC would also like to acknowledge that Enumclaw may be challenged to address recommendations in this letter before the state-mandated deadline for comprehensive plan adoption of December 31, 2024, and may potentially adopt a comprehensive plan in 2024 that is not in alignment with the CPP Housing Chapter. In that case, the City is encouraged to amend its plan in 2025 to incorporate AHC feedback and bring its plan into alignment with the CPP Housing Chapter policies.

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, Carson Hartmann, at AHCplanreview@kingcounty.gov or at 206-848-0681.

Sincerely,



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