

Affordable Housing Committee

KING COUNTY
GROWTH
MANAGEMENT
PLANNING COUNCIL

CHAIR

Claudia Balducci
*King County
Councilmember*

VICE CHAIR

Alex Brennan
Futurewise

MEMBERS

Susan Boyd
Bellwether Housing

Jane Broom
Microsoft Philanthropies

Kelly Coughlin
*SnoValley Chamber of
Commerce*

Amy Falcone
*Kirkland Councilmember,
Sound Cities Association*

Nigel Herbig
*Kenmore Mayor, Sound
Cities Association*

Thatcher Imboden
Sound Transit

Ryan Makinster
*Washington Multi-Family
Housing Association*

Sunaree Marshall
*On behalf of King County
Executive Dow
Constantine*

Ryan McIrvin
*Renton Councilmember,
Sound Cities Association*

Cathy Moore
*City of Seattle
Councilmember*

Teresa Mosqueda
*King County
Councilmember*

Lynne Robinson
*Bellevue Mayor, Sound
Cities Association*

Veronica Shakotko
*Master Builders
Association of King and
Snohomish Counties*

Robin Walls
*King County Housing
Authority*

Maiko Winkler-Chin
*On behalf of Seattle
Mayor Bruce Harrell*

September 5, 2024

Todd Hall
Principal Planner
City of Kenmore
18120 68th Ave NE
Kenmore, WA 98028

Dear Mr. Hall,

Thank you for submitting the City of Kenmore's draft Kenmore 2044 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 Kenmore’s draft comprehensive plan. During review, the AHC noted that many of Kenmore’s plans, policies, analyses, and implementation strategies align well with the CPP Housing Chapter policies. In particular:

1. Kenmore is a member of A Regional Coalition for Housing (ARCH) and a regular contributor to ARCH’s Housing Trust Fund, which can fund affordable housing projects throughout member cities in East King County, including Kenmore. As described in Kenmore’s draft Housing Element, their contributions assisted with the development of nearly 200 units of affordable housing in Kenmore and throughout the region (page 25).
2. In 2019, Kenmore rezoned parcels downtown to preserve manufactured homes. This, along with multiple Housing Element policies, show Kenmore’s commitment to implementing anti-displacement strategies for residents of manufactured homes, over half of which are low-income.
3. In 2022, Kenmore City Council approved Ordinance 22-0545 which includes a variety of tenant protections. This work is supported by Kenmore’s draft comprehensive plan which proposes policies to support housing stability through tenant protections.
4. Kenmore’s Diversity, Equity, Inclusion and Accessibility (DEIA) Strategic Plan’s policy 2.1.1 committed Kenmore to developing their comprehensive plan with “a focus on DEIA and will include policies in its elements that advance DEIA and root out systemic inequality.”¹

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

Recommendations to Align with the CPP Housing Chapter

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

1. Plan for and accommodate allocated housing needs (CPPs H-1 and H-11)

Relevant Countywide Planning Policies

CPP H-1 requires Kenmore plan for and accommodate 3,070 net new housing units, including 559 units of permanent supportive housing, 1,063 of non-permanent supportive housing units affordable to extremely low-income households (incomes at or below 30 percent area median income (AMI)), as well as 587 emergency housing beds. CPP H-11 requires jurisdictions to identify sufficient capacity of land for housing including housing for low-, very low-, and extremely low-income households.

Kenmore’s Proposal and AHC Findings

Kenmore’s draft Housing Element narrative discusses Kenmore’s housing needs and identifies a barrier of “very limited options for emergency housing, emergency shelter, and permanent supportive housing” (page 28). The plan also proposes policies and implementation strategies that will support the development of housing types needed to meet the city’s housing needs. This includes Housing Element policies H-4.2.10 on transitional housing and H-4.2.3 on using city-owned property for housing affordable to 0 to 100 percent of AMI households. Kenmore staff also shared that they are participating in discussions about siting affordable housing and emergency housing on publicly owned properties in Kenmore. The AHC commends Kenmore for these policies and its proactive efforts to create affordable housing. However, the AHC does not see a policy that explicitly states

¹ City of Kenmore. Diversity, Equity, Inclusion, & Accessibility Strategic Plan 2023-2028. Page 15. [\[link\]](#)

Kenmore’s intent to plan for and accommodate permanent supportive housing and emergency housing types, as required by CPP H-1.

In addition to a clear intent to plan for and accommodate their allocated housing needs, Kenmore needs to demonstrate that there is sufficient residential capacity for its allocated housing needs. Kenmore did not submit a land capacity analysis as part of their draft comprehensive plan. Without this, the AHC cannot determine if Kenmore has sufficient residential capacity for its allocated housing needs and is out of alignment with CPP H-11.

Recommendation 1: To align with CPP H-1, Kenmore should adopt a policy stating its 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.

To align with CPP H-1 and CPP H-11, Kenmore should demonstrate that it is providing sufficient residential capacity for its allocated housing need through a land capacity analysis. Please see Washington State Department of Commerce’s [“Guidance for Updating Your Housing Element”](#) for a guide on how to complete a land capacity analysis.

2. Complete the housing inventory and analysis to inform policies and strategies (CPPs H-3 and H-4)

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. CPP H-4 requires jurisdictions to evaluate the effectiveness of existing housing policies and strategies to meet the jurisdiction’s housing needs.

Kenmore’s Proposal and AHC Findings

While Kenmore’s submission includes many data points and substantive analysis, the AHC could not find specific information required by CPP H-3(b), (g), (h), (i), and (l). This includes:

- b) number of existing housing units by age, number of bedrooms, condition, and tenure;
- g) current population characteristics by race/ethnicity and disability;
- h) projected population growth;
- i) housing development capacity within a half-mile walkshed of high-capacity or frequent transit service, if applicable; and
- l) the housing needs of people who need supportive services or accessible units, including but not limited to people experiencing homelessness, persons with disabilities, people with medical conditions, and older adults.

This additional analysis should inform additional comprehensive plan policy responses and strategies. For example, analysis responsive to CPP H-3(l) could help inform implementation of Kenmore’s Housing Element Policy H-2.2.2 to increase access between special needs housing and other programs.

The AHC found that Kenmore’s Racial Equity Analysis and Recommendations report fulfilled CPP H-4. However, the report is not currently summarized in Kenmore’s comprehensive plan, nor is it clear that the report will be adopted with the comprehensive plan.

Recommendation 2: Kenmore should include all inventory and analysis components as required by CPPs H-3 and H-4 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. Include community engagement findings in the Comprehensive Plan (CPP H-8)

Relevant Countywide Planning Policies

CPP H-8 requires 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.

Kenmore’s Proposal and AHC Findings

Kenmore conducted extensive community engagement through a Racial Equity Analysis, their Diversity, Equity and Inclusion (DEI) Task Force, and through their membership to ARCH who contracted with community-based organizations to hear input on middle housing. The AHC commends Kenmore for this engagement. However, the documents outlining this engagement are not included or summarized in Kenmore’s draft comprehensive plan. Without this summary, the AHC cannot determine if Kenmore is prioritizing the solutions articulated by populations most disproportionately impacted by housing cost burden.

Recommendation 3: To align with CPP H-8, Kenmore should summarize their community engagement processes and findings in their comprehensive plan and demonstrate how they are prioritizing the input from communities most disproportionately impacted by housing cost burden.

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

Relevant Countywide Planning Policies

CPPs H-10 and H-14 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.

Kenmore’s Proposal and AHC Findings

Kenmore’s draft plan proposes policies and implementation strategies that frequently use the term “affordable housing.” The AHC commends Kenmore for these efforts, which are closely aligned with the goals and policies of the CPP Housing Chapter. However, the AHC could not find policies or implementation strategies that propose explicitly planning for and prioritizing resources for *long-term income-restricted* affordable housing, as required by CPP H-10 and CPP H-14.

While the term “affordable housing” includes income-restricted affordable housing, it also includes “naturally occurring” affordable housing, which is not guaranteed to remain affordable. Income-restricted housing is guaranteed to provide lower-income households with a long-term affordable place to live due to regulatory restrictions that limit price over a set affordability term.

Recommendation 4: To align with CPPs H-10 and H-14, Kenmore should include or amend existing policies and strategies to explicitly increase the supply of and prioritize resources for long-term income-restricted housing.

5. Increase housing options for 0 to 80 percent of AMI households in Residential zones (CPPs H-9, H-18(a), H-22, and H-25)

Relevant Countywide Planning Policies

CPP H-9 requires all jurisdictions to adopt intentional, targeted actions that repair harms to Black, Indigenous, and other People of Color (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-22 requires 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. 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.

Kenmore’s Proposal and AHC Findings

In the draft Housing Element, the History of Racially Disparate Land Use and Housing Practices section identifies single-family zoning—which in 2023 applied to 95 percent of exclusively residentially zoned land in the city—as a driver of exclusion of low-income households (Housing Element, page 3, 22). In an apparent effort to allow for a greater range of housing types and options throughout the city, the draft plan proposes policies to reduce disparities in access to neighborhoods and increase the ability for all residents to live in their neighborhood of choice (see Goal H-5). This includes changes to zoning allowances in historically single-family neighborhoods to include middle housing types, in compliance with 2023 House Bill 1110.

The AHC commends Kenmore’s efforts to expand middle housing types in traditionally single-family areas. However, the AHC does not find that proposed changes to zoning in these areas alone will meaningfully respond to findings in the History of Racially Disparate Land Use and Housing Practice section of the draft Housing Element, as required by CPP H-9, provide affordable housing *throughout* the jurisdiction, as required by CPP H-18(a), or promote fair housing policies and practices so that every person in the county has equitable access and opportunity to thrive in their communities of choice, as required by CPP H-22. Primarily, the AHC is concerned that middle housing types will not be affordable to households below 80 percent of AMI. A recent report by ARCH modelled the likely costs of middle housing types in Kenmore, finding that middle housing is affordable at minimum to

households at 140 percent of AMI or above.² This means that a majority of Kenmore’s residential areas will remain economically exclusive to low-income households, who, in King County, are also disproportionately Black and Indigenous.³

In addition to this, the AHC is concerned that the proposed land use pattern does not protect and promote the health and well-being of residents by avoiding or mitigating exposure to environmental hazards and pollutants, as required by CPP H-25. Instead, the draft plan appears to place disproportionate environmental and health burdens—specifically exposure to heavy automobile traffic, air pollutants, and noise—on Kenmore’s current and future low-income residents. This is because the draft plan proposes accommodating the majority of its 0 to 80 percent of AMI housing needs in areas adjacent to State Route 522 and nearby multiple industrial facilities, including Kenmore Industrial Park. The Environmental Protection Agency (EPA) compiled data on environmental indicators and found that the block group containing Kenmore Industrial Park has higher levels of particulate matter, cancer risk, respiratory hazard index, and traffic proximity and volume than the state average.⁴

Recommendation 5: To align with CPPs H-9, H-18(a), H-22, and H-25, Kenmore 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, particularly in historically single-family zones. Increasing access does not necessarily mean Kenmore needs to allow for midrise zoning in all residential zones. Any land use capacity changes should be consistent with county and regional requirements.

In responding to this recommendation, the AHC encourages Kenmore staff to incorporate recommendations from ARCH’s 2024 [Middle Housing Affordability Opportunities in East King County](#) into the draft plan and in future amendments to the City’s implementation strategies.

Conclusion and AHC Resources

Thank you again for your submission to the Committee’s Housing-focused Draft Comprehensive Plan Review Program. AHC members valued the opportunity to review the draft Kenmore 2044 Comprehensive Plan and related submission materials. Kenmore’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 Kenmore 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](#).

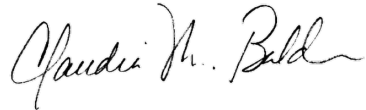
² ARCH. (2024, June). *Middle Housing Affordability Opportunities in East King County: Analysis, Policy Recommendations and Considerations for Local Implementation of HB 1110*. page 19-20. [\[link\]](#)

³ Median household income dashboard. Communities Count. 2024 [\[link\]](#)

⁴ United States Environmental Protection Agency (2017, January 4). *EJSCREEN Report*. [\[link\]](#)

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,



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

CC Dow Constantine
Growth Management Planning Council Chair
King County Executive

Nigel Herbig
Mayor
City of Kenmore

Laura Hodgson
Senior Planner
Washington State Department of Commerce

Plan Review Team
Puget Sound Regional Council

Plan Review Team
King County Affordable Housing Committee