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November 7, 2024

Angelie Stahlnecker
Planning Manager
City of Milton
1000 Laurel Street
Milton, WA 98354

Dear Ms. Stahlnecker,

Thank you for submitting the City of Milton's draft comprehensive plan to the Affordable Housing Committee's (AHC) Housing-focused Draft Comprehensive Plan Review Program for review on August 28, 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 Milton’s draft comprehensive plan. During review, the AHC noted that many of Milton’s plans, policies, analyses, and implementation strategies align well with CPP Housing Chapter policies. In particular:

1. Milton’s submission to the AHC included an implementation strategy to “provide financial assistance, fee waivers, or other incentives to homeowners who construct an accessory dwelling unit (ADU) and rent it to households earning less than 50 percent Area Median Income (AMI).” This strategy increases the supply of income-restricted housing, housing diversity, and contributes to housing choice throughout low-density residential zones for extremely low- and very low-income households, aligning with CPPs H-10 and H-18.
2. The draft plan’s racially disparate impact analysis is thorough, thoughtful, and well summarized and aligns well with the requirements of CPP H-5. Findings from the racially disparate impact analysis help set reasonable expectations that many of the policies and implementation strategies in Milton’s draft plan will meaningfully address identified racial disparities and increase the economic inclusiveness of the City’s housing market. This includes an explicit commitment to “prioritizing projects that promote access to opportunity, anti-displacement, and wealth-building for Black, Indigenous, and People of Color (BIPOC) communities” in Milton’s Housing Element policy HO 6.2(c), in alignment with CPP H-14.

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

Recommendations to Align with the CPP Housing Chapter

The AHC recommends Milton 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 to prioritize the need for housing affordable to households less than or equal to 30 percent of AMI (extremely low-income).

Milton’s Proposal and AHC Findings

Milton’s submission to the AHC identifies many policies and implementation strategies as responsive to CPP H-2, including:

- allowing manufactured housing within all residential neighborhoods;
- implementing non-discriminatory zoning regulations for group homes;
- planning to accommodate an adequate and reasonable supply of permanent supportive housing, foster care housing, and other housing for those with special needs; and
- establishing a minimum density for all residential zones.

While these policies and strategies will likely serve and benefit households at incomes less than 30 percent of AMI, the AHC did not identify a policy or implementation strategy that explicitly *prioritizes* housing needs of these households.

Specifically, Housing Element policies HO 3.2, 3.4, and 6.2 in the draft plan, that work toward providing housing for and supporting low-income residents, mention low-income (50 to 80 percent of AMI) and very low-income (30 to 50 percent of AMI) households but not *extremely low-income*

households (0 to 30 percent of AMI). Submitted implementation strategies also mention various ways Milton will incentivize or leverage partnerships for affordable housing development but do not mention which income groups this housing will serve or prioritize.

Milton staff confirmed that they are working to integrate a prioritization of extremely low-income households into the draft plan during the City’s initial review meeting.

Recommendation 1: To align with CPP H-2, Milton should amend its Housing Element policies and implementation strategies to clearly demonstrate how the City will prioritize extremely low-income households’ housing needs.

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 and summarize the findings in the housing element.

Milton’s Proposal and AHC Findings

While Milton’s submission includes many data points and substantive analysis, the AHC could not find specific information required by CPP H-3(f), (k), and (l). This includes:

- f) housing cost burden and severe housing cost burden by race/ethnicity;
- k) summary of existing and proposed partnerships and strategies, including dedicated resources, for meeting housing needs, particularly for populations disparately impacted; 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(k) could help inform the analysis required by CPP H-4. Additionally, analysis responsive to CPP H-3(l) could help inform implementation of Milton’s Housing Element policy HO 3.3 to plan for and accommodate supply of permanent supportive housing and special needs housing. Milton’s draft Racial Equity Analysis shows housing cost burden between “White alone, not Hispanic” and “BIPOC overall,” rather than disaggregating data by race and ethnicity, as required by CPP H-3(f) (page 69). Disaggregating cost burden by race/ethnicity would more accurately represent Milton’s community, as races and ethnicities within the BIPOC category likely do not all have the same rate of cost burden.

Recommendation 2: Milton should include all inventory and analysis components as required by CPPs H-3 in the comprehensive plan and summarize the findings in the Housing Element.

3. Clarify community engagement findings (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.

Milton's Proposal and AHC Findings

Milton's submission to the AHC includes thorough documentation and findings from its community engagement processes. The AHC commends Milton for its multiple touchpoints with community, including conducting outreach at two schools, hosting a comprehensive plan visioning workshop, and soliciting survey responses. However, findings from this outreach do not describe takeaways from engagement with communities most disproportionately impacted by housing cost burden. For example, the draft plan's Racial Equity Analysis finds that households of color are more likely to be housing cost burdened than White households (page 63). The AHC did not see evidence of specific engagement with these communities or other disproportionately cost-burdened communities in King County in Milton's submission materials or in the draft plan.

Milton staff shared in the City's initial review that input from community members who experienced housing cost burden was captured in their community engagement efforts. The City intends to better reflect this engagement in their comprehensive plan. Additionally, Milton plans to conduct further community engagement as part of a subarea planning effort that includes Spring Valley Mobile Home Park.

Recommendation 3: To align with CPP H-8, Milton should demonstrate how they collaborated with and prioritized the solutions articulated by populations most disproportionately impacted by housing cost burden. This information should be included in the comprehensive plan.

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 Milton's draft comprehensive plan and related submission materials. Milton'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.

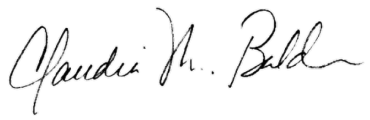
AHC staff are happy to assist Milton in addressing these recommendations. For immediate resources and guidance on aligning with the CPP Housing Chapter, refer to the:

- [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 Milton 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, Milton is encouraged to amend its plan in 2025 to incorporate AHC feedback and bring its plan into alignment with the King County 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 206-848-0681.

Sincerely,



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

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