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*On behalf of Seattle  
Mayor Bruce Harrell*

September 28, 2023

Ian Lefcourte  
Senior Planner  
City of Redmond  
15670 NE 85th Street  
Redmond, WA 98073

Dear Mr. Lefcourte,

Thank you for submitting the City of Redmond's draft comprehensive plan to the Affordable Housing Committee (AHC) for housing-focused comprehensive plan review.

As outlined in the amended King County Countywide Planning Policies (CPP) Housing Chapter Policy H-26, the AHC, as a designee of the Growth Management Planning Council, now conducts a housing-focused review of all King County jurisdictions' draft periodic comprehensive plan updates for alignment with the CPP Housing Chapter goals and policies prior to plan adoption and provides comments.<sup>1</sup>

AHC members valued the opportunity to review Redmond's submitted draft comprehensive plan. Redmond'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.

The AHC acknowledges the substantial amount of time and effort that went into Redmond's draft comprehensive plan. Many of the plan's policies and analyses align well with CPP Housing Chapter policies, especially:

- 1. The plan's housing inventory and analysis, which includes a complete inventory of existing and projected housing needs of all segments of the population as called for in CPP H-3.** This analysis lays important groundwork for policies proposed in the plan.
- 2. Redmond's comprehensive plan and 2021 Housing Action Plan (HAP) demonstrate the City's intention to reduce and mitigate displacement for vulnerable populations as the city grows.** Proactive identification of at-risk properties in need of housing preservation interventions is a direct and meaningful way to address displacement concerns (Redmond comprehensive plan policy HO-1 and HAP actions 5.1 and 5.2).

Below, the AHC includes both recommendations necessary to align and suggestions to strengthen existing alignment with the CPP Housing Chapter policies.

## Recommendations to Align with the CPP Housing Chapter

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<sup>1</sup> King County Council adopted CPP amendments establishing this authority on August 15, 2023 [[Ordinance 19660](#)]. These amendments now must be ratified by King County cities.

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The AHC recommends Redmond take the following **actions necessary to align** the draft comprehensive plan with CPP Housing Chapter polices and goals:

1. **Income-restricted housing in employment centers and in proximity to high-capacity transit ( CPPs H-2, H-14, H-15, H-17).** CPP H-2 asks jurisdictions to “prioritize the need for housing affordable to household less than or equal to 30 percent of area median income.” CPP H-14 asks jurisdictions to prioritize resources, such as surplus property, “for income-restricted housing, particularly for extremely low-income households.” CPP H-15 addresses increasing “housing choices...within a reasonable commute to major employment centers and affordable to all income levels.” CPP H-17 asks that comprehensive plans “support the development and preservation of income-restricted affordable housing that is within walking distance of planned or existing high-capacity transit (HCT).” Redmond proposes a high-rise development pattern around future light rail stations in Overlake, Marymoor Village, and Downtown. High-rise affordable housing development is uncommon due to increased land values and construction costs. In meetings with the AHC, Redmond staff indicated the plan will establish new mid-rise zones, where the production of income-restricted housing projects affordable to households below 80 percent of area median income (AMI) is more likely, primarily in areas outside of Redmond’s transit and employment centers.

#### **Recommendation 1**

To align with CPPs H-2, H-14, H-15, and H-17, Redmond should articulate strategies to advance the production or preservation of income-restricted housing in Redmond’s Overlake, Marymoor Village, and Downtown centers. Potential strategies to address the AHC’s recommendation include:

- Clarify regulations dictating where mandatory inclusionary zoning in-lieu fees must be used, encouraging or requiring that the fees support production or preservation of units within growth centers.
- Clarify how publicly-owned lands within centers could support the production of affordable housing. This would strengthen the plan’s alignment with CPP H-14, which asks plans “prioritize the use of local and regional resources...for affordable housing.”
- Explain the opportunity to build on lands owned by religious organizations and how code changes responsive to HO-12 would support the development of income-restricted housing in Redmond’s centers.

2. **Closing the racial gap in homeownership (CPPs H-4, H-19, H-20).** CPP H-19b asks jurisdictions to emphasize “remedying historical inequities in and expanding access to homeownership opportunities for Black, Indigenous and People of Color communities.” Redmond’s plan includes multiple policies related to affordable homeownership and eliminating racial and other disparities in housing and neighborhood choice. However, the plan does not include a policy specifically regarding closing the racial homeownership gap.

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### Recommendation 2

To align with CPPs H-4, H-19, and H-20, Redmond should:

- Describe how proposed homeownership policies work to close racial homeownership gaps.
- Include more specific measures to address the gap in updated implementation details for comprehensive plan policies HO-2, HO-3, HO-6, HO-18, and HO-21.

3. **Local Documentation of Redmond’s history of racially exclusive and discriminatory land use and housing practices (CPP H-5).** CPP H-5 asks jurisdictions to document the local history and impact of racially exclusive and discriminatory land use and housing practices. In the “Exclusionary Land Use and Housing” section of the housing element, Redmond staff conclude that “[r]eview of internal City documents, ordinances, and historical resources did not discover any explicitly racist land use or housing regulations in Redmond.” The plan does not provide details on this analysis, such as which documents, ordinances, or historical resources staff reviewed. Additionally, analysis of discriminatory land use and housing practices, listed on pages 17 through 19 of the housing element does not explain the local impact of these practices, i.e. within Redmond or east King County.

### Recommendation 3

To align with CPP H-5, Redmond should:

- Detail the methodology and data sources used to reach conclusions in documenting the local history of racially exclusive and discriminatory land use and housing practices.
- Describe the impact of racially exclusive and discriminatory land use and housing practices within Redmond or east King County. AHC staff are happy to assist Redmond staff with this research.

4. **Housing options affordable to households at or below 50 percent of AMI in lower density zones (CPP H-18).** CPP H-18 asks that jurisdictions “adopt inclusive planning tools and policies to increase the ability of all residents...to live in the neighborhood of their choice” by “expanding capacity for moderate-density housing...especially in areas currently zoned for lower density single-family detached housing.” Redmond is taking significant steps in its plan to increase access to currently low-density, single-family zoning districts by redesignating them Neighborhood Residential (NR) zones that allow for moderate density housing. These areas apply to over half of the city’s land area. However, Redmond’s housing technical appendix anticipates the NR zone will not accommodate housing units affordable to households below 50 percent of AMI.

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#### Recommendation 4

To align with CPP H-18, Redmond should explain how the City will increase housing options affordable to households at or below 50 percent of AMI in NR zones. Strategies to address this recommendation could include:

- Explaining how using land owned by religious organizations will create more housing options in the NR zones.
- Partnering with affordable homeownership developers, who are more likely to construct projects in moderate-density zones.

5. **Safe and healthy housing (CPP H-24).** CPP H-24 asks jurisdictions to “adopt and implement programs and policies that ensure healthy and safe housing.” Redmond’s plan includes elements that encourage healthy environments, universal design standards, walkability, and other holistic planning policies to promote healthy communities. The vision statement also identifies that mixed-use and multifamily structures are constructed with safety features and designs that lead them to be less likely to be damaged from earthquakes and other events. However, Redmond’s plan does not include a policy directly related to safe and healthy homes, which could protect and promote the health and well-being of residents of existing housing in Redmond.

#### Recommendation 5

To align with CPP H-24, include a safe and healthy housing policy. For examples of strategies that jurisdictions may use to implement a safe and healthy housing policy, see the CPP Housing Technical Appendix.<sup>2</sup>

### Suggestions to Strengthen Plan Alignment with the CPP Housing Chapter

While the plan is currently aligned with CPPs H-4 and H-12, the AHC suggests that Redmond strengthen its alignment with these CPPs with the following actions:

1. **Analysis of effectiveness and gaps in partnerships, policies, and dedicated resources (H-4).** CPP H-4 asks that jurisdictions “[e]valuate the effectiveness of existing housing policies and strategies to meet the jurisdiction’s housing needs” and “[i]dentify gaps in existing partnerships, policies, and dedicated resource for meeting housing needs.” The CPP Housing Technical Appendix suggests evaluating quantitative impacts of partnerships, policies, and dedicated resource where possible. While Redmond’s current analysis provides information on the number of income restricted units inclusionary zoning and multifamily property tax exemption (MFTE) programs have produced since their onset, the current analysis does not predict how these programs will contribute to countywide housing needs over the planning period.

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<sup>2</sup> See [Attachment 2](#) in King County Ordinance 19660, Appendix 4: Housing Technical Appendix, Table H-3, pgs. 46-47 for adopted but not yet ratified amendments to the CPP Housing Chapter Technical Appendix.

### Suggestion 1

To strengthen alignment with CPP H-4, add an analysis of expected production of income-restricted units from housing programs, such as inclusionary zoning or MFTE, over the planning period to the “Partnerships, Resources, Regulations, Incentives, and Strategies (Existing and Proposed)” section of the housing element. Modelling anticipated affordable housing production would strengthen Redmond’s alignment with CPP H-4 by clarifying the gaps in current strategies to address countywide needs and with CPP H-12 by demonstrating how proposed policies and programs in Redmond’s plan will address identified gaps.

- 2. Implementation details and housing element policies (CPPs H-26d, H-27a).** Redmond submitted the City’s HAP as the implementation details for AHC review required by CPP H-26d and H-27a. However, HAP actions are not clearly referenced to Redmond’s housing element policies, making it difficult for the AHC to evaluate how Redmond’s proposed actions will specifically implement policies in the comprehensive plan.

### Suggestion 2

After Redmond’s final plan is adopted, the AHC encourages Redmond staff to submit updated implementation details to AHC staff, with actions linked to specific comprehensive planning policies. AHC staff are happy to serve as a resource for Redmond staff as they prepare their final implementation details.

AHC staff are happy to assist Redmond staff in addressing these recommendations and comments. For immediate resources and guidance on aligning with the CPP Housing Chapter, refer to [the CPP Housing Chapter Technical Appendix](#) and the King County [Resources for Documenting the Local History of Racially Exclusive and Discriminatory Land Use and Housing Practices guidance](#).

Thank you again for your submission to the AHC’s housing-focused comprehensive plan review program. If you have questions or need additional information regarding aligning with the CPP Housing Chapter, please contact lead staff on the AHC plan review program, Isaac Horwith, at [Isaac.Horwith@kingcounty.gov](mailto:Isaac.Horwith@kingcounty.gov) or at 209-477-7813.

Sincerely,



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

CC Dow Constantine

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Growth Management Planning Council Chair  
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Plan Review Team  
King County Affordable Housing Committee

Plan Review Team  
Puget Sound Regional Council

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# Appendix A: King County Countywide Planning Policies and Housing Technical Appendix Policies Cited

## CPP Housing Chapter Policies

This letter cites the following CPP Housing Chapter policies:

**H-2** Prioritize the need for housing affordable to households less than or equal to 30 percent area median income (extremely low-income) by implementing tools such as:

- a) Increasing capital, operations, and maintenance funding;
- b) Adopting complementary land use regulations;
- c) Fostering welcoming communities, including people with behavioral health needs;
- d) Adopting supportive policies; and
- e) Supporting collaborative actions by all jurisdictions.

**H-3** Conduct an inventory and analysis in each jurisdiction of existing and projected housing needs of all segments of the population and summarize the findings in the housing element. The inventory and analysis shall include:

- a) The number of existing and projected housing units necessary to plan for and accommodate projected growth and meet the projected housing needs articulated in Tables H-1 and H-2, including:
  - 1) permanent housing needs, which includes units for moderate-, low-, very low-, and extremely low-income households and permanent supportive housing,
  - 2) emergency housing needs, which includes emergency housing and emergency shelters;
- b) Number of existing housing units by housing type, age, number of bedrooms, condition, tenure, and area median income limit (for income-restricted units);
- c) Number of existing emergency housing, emergency shelters, and permanent supportive housing facilities and units or beds, as applicable;
- 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;
- f) Household characteristics, by race/ethnicity:
  - 1) income (median and by area median income bracket),
  - 2) tenure (renter or homeowner),
  - 3) housing cost burden and severe housing cost burden;
- g) Current population characteristics:
  - 1) age by race/ethnicity,
  - 2) disability;
- h) Projected population growth;
- i) Housing development capacity within a half-mile walkshed of high-capacity or frequent transit service, if applicable;
- j) Ratio of housing to jobs in the jurisdiction;
- k) Summary of existing and proposed partnerships and strategies, including dedicated resources, for meeting housing needs, particularly for populations disparately impacted;

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- 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;
- m) The housing needs of communities experiencing disproportionate harm of housing inequities including Black, Indigenous, and People of Color (BIPOC); and
- n) Areas in the jurisdiction that may be at higher risk of displacement from market forces that occur with changes to zoning development regulations and public capital investments.

**H-4** Evaluate the effectiveness of existing housing policies and strategies to meet the jurisdiction's housing needs. 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.

**H-5** Document the local history of racially exclusive and discriminatory land use and housing practices, consistent with local and regional fair housing reports and other resources. Explain the extent to which that history is still reflected in current development patterns, housing conditions, tenure, and access to opportunity. Identify local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing, including zoning that may have a discriminatory effect, disinvestment, and infrastructure availability. Demonstrate how current strategies are addressing impacts of those racially exclusive and discriminatory policies and practices. The County will support jurisdictions in identifying and compiling resources to support this analysis.

**H-12** 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.

**H-14** Prioritize the use of local and regional resources (e.g., funding, surplus property) for income-restricted housing, particularly for extremely low-income households, populations with special needs, and others with disproportionately greater housing needs. Consider projects that promote access to opportunity, anti-displacement, and wealth building for Black, Indigenous, and People of Color communities to support implementation of policy H-9.

**H-15** Increase housing choices for everyone, particularly those earning lower wages, that is co-located with, accessible to, or within a reasonable commute to major employment centers and affordable to all income levels. Ensure there are zoning ordinances and development regulations in place that allow and encourage housing production at levels that improve jobs-housing balance throughout the county across all income levels.

**H-17** Support the development and preservation of income-restricted affordable housing that is within walking distance to planned or existing high-capacity and frequent transit.

**H-18** Adopt inclusive planning tools and policies whose purpose is to increase the ability of all residents in jurisdictions throughout the 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:

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- a) Providing access to affordable housing to rent and own throughout the jurisdiction, with a focus on areas of high opportunity;
- b) Expanding capacity for moderate-density housing throughout the jurisdiction, especially in areas currently zoned for lower density single-family detached housing in the Urban Growth Area, and capacity for high-density housing, where appropriate, consistent with the Regional Growth Strategy;
- c) Evaluating the feasibility of, and implementing, where appropriate, inclusionary and incentive zoning to provide affordable housing; and
- d) Providing access to housing types that serve a range of household sizes, types, and incomes, including 2+ bedroom homes for families with children and/or adult roommates and accessory dwelling units, efficiency studios, and/or congregate residences for single adults.

**H-19** Lower barriers to and promote access to affordable homeownership for extremely low-, very low-, and low-income households. Emphasize:

- a) Supporting long-term affordable homeownership opportunities for households less than or equal to 80 percent of the area median income (which may require up-front initial public subsidy and policies that support diverse housing types); and
- b) Remedying historical inequities in and expanding access to homeownership opportunities for Black, Indigenous, and People of Color communities.

**H-20** 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.

**H-24** Adopt and implement programs and policies that ensure healthy and safe homes.

**H-26** The Growth Management Planning Council or its designee will conduct a housing-focused review of all King County jurisdiction's draft periodic comprehensive plan updates for alignment with the Housing Chapter goals and policies prior to plan adoption and provide comments. The purpose of plan review is to:

- a) offer early guidance and assistance to jurisdictions on comprehensive plan alignment with the CPP Housing Chapter;
- b) ensure plans address all Housing Chapter goals and policies and include required analyses;
- c) evaluate the meaningfulness of plan responses to policies in this chapter, where meaningful responses can be reasonably expected to achieve a material, positive change in the jurisdiction's ability to meet housing needs; and
- d) collect data on jurisdictional implementation details to inform future monitoring and evaluation during the remainder of the planning period.

**H-27a** Monitor progress toward meeting countywide and jurisdictional housing needs and eliminating disparities in access to housing and neighborhood choices. Where feasible, use existing regional and jurisdictional reports and monitoring tools and collaborate to reduce duplicative reporting.

- a) Jurisdictions, including the County for unincorporated areas, will report annually to the County:
  - 1) In the first reporting year, total income-restricted units, total units, by tenure, area median income limit, address, and term of rent and income restrictions, for which the jurisdiction is a party to affordable housing covenants on the property title created during

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- the reporting period. In future years, report new units created and units with affordability terms that expired during the reporting period;
- 2) Description and magnitude of land use or regulatory changes to increase zoned residential capacity including, but not limited to, single-family, moderate-density, and high-density;
  - 3) New strategies (e.g., land use code changes, dedicated fund sources, conveyance of surplus property) implemented during the reporting period to advance the policies of this chapter. This includes strategies to increase housing diversity, strategies to increase the supply of income-restricted units in the jurisdiction and implementation details identified in the jurisdiction's comprehensive plan; and
  - 4) The value of jurisdictional contributions to subregional collaborations to support preservation or creation of income-restricted housing within the subregion made during the reporting period. Contributions may include, but are not limited to, cash loans and grants, land, and fee waivers.

#### **CPP Appendix 4: Housing Technical Appendix**

This letter cites the following guidance from the CPP Housing Technical Appendix:

##### **Policy H-4: Evaluate Effectiveness**

Prior to updating their comprehensive plan, a jurisdiction must evaluate the effectiveness of existing housing policies and strategies to plan for and accommodate their allocated share of countywide need. This will help a jurisdiction identify the need to adjust current policies and strategies or implement new ones. Where possible, jurisdictions are encouraged to identify actual housing units created, by affordability level, since their last comprehensive plan update.

This evaluation must also identify gaps in existing partnerships, policies, and dedicated resources for meeting the countywide need and eliminating racial and other disparities in access to housing and neighborhoods of choice. This exercise helps a jurisdiction understand what other strategies it should pursue beyond updating the comprehensive plan to meet the goals of this chapter. Some strategies, like inclusionary housing or new dedicated resources, will be easier to evaluate a quantitative impact and for others, it may be more qualitative. Jurisdictions without the ability to identify the impact of each policy may wish to describe the policies and programs that contributed to creating or preserving a given number of income-restricted units, special needs housing units, etc.

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