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September 5, 2024

David Pyle
Community Development Director
Department of Community Development
City of Sammamish
801 228th Avenue SE
Sammamish, WA 98075

Dear Mr. Pyle,

Thank you for submitting the City of Sammamish's draft Envision Sammamish 2044 to the Affordable Housing Committee's (AHC) Housing-focused Draft Comprehensive Plan Review Program for review on June 18, 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 Sammamish’s draft comprehensive plan. During review, the AHC noted that many of Sammamish’s plans, policies, analyses, and implementation strategies align well with CPP Housing Chapter policies. In particular:

1. The draft plan’s racially disparate impact (RDI) analysis is thorough, thoughtful, and well summarized and aligns well with the requirements of CPP H-5. Findings from the RDI analysis help set reasonable expectations that many of the policies and implementation strategies in Sammamish’s plan will meaningfully address identified racial disparities and increase the economic inclusiveness of the City’s housing market. This includes a direct commitment to “close the racial homeownership gap” in Sammamish’s Housing Element policy H.7.4.
2. The draft plan proposes incentives for affordable housing construction on surplus publicly and religiously owned parcels. This strategy aligns well with the CPP H-14, as it demonstrates that the City prioritizes “the use of local and regional resources (e.g., funding, surplus property) for income-restricted housing.”
3. The draft plan demonstrates a strong commitment to regional collaboration in alignment with CPP H-6. Specifically, the draft plan’s implementation strategies commit the City of Sammamish to actively partner with A Regional Coalition for Housing (ARCH) to increase affordable housing options in the city. For example, the plan includes implementation strategies that commit the City to work with ARCH to launch a downpayment assistance program and generally expand affordable housing options throughout the City.

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

Recommendations to Align with the CPP Housing Chapter

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

1. Prioritize extremely low-income households (CPPs H-1 and H-2)

Relevant Countywide Planning Policies

CPP H-1 requires Sammamish to plan for and accommodate 950 units of housing affordable to households between 0 and 30 percent of area median income (AMI). 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).

Sammamish’s Proposal and AHC Findings

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

- ensuring development regulations support and encourage housing opportunities for special needs populations;
- identifying and pursuing funding sources and subsidies for affordable housing development;
- proposing a sales and use tax of up to 0.1 percent to fund affordable housing serving Sammamish households earning less than 60 percent of AMI;
- supporting a range of housing types for Black, Indigenous, and People of Color (BIPOC) households, seniors, multigenerational households, and other communities with disproportionate need; and

- maintaining key partnerships to support affordable housing development on the Eastside.

While these policies will likely serve and benefit households with 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 H.3.2, H.3.3, and H.4.5 in the draft plan 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 to incentivize or leverage partnerships for ‘affordable housing’ development but do not mention which income groups this housing will serve or prioritize.

Recommendation 1: To align with CPPs H-1 and H-2, Sammamish 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 to inform policies and strategies (CPPs H-3, H-4, H-12, and H-20)

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. CPP H-4 requires jurisdictions identify gaps in existing policies, strategies, and partnerships for meeting housing needs and eliminating racial and other disparities in access to housing and neighborhoods of choice. CPP H-12 requires jurisdictions 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-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.

Sammamish’s Proposal and AHC Findings

While Sammamish’s submission includes many data points and substantive analysis, the AHC could not find specific information required by CPP H-3(k), which requires a summary of existing and proposed partnerships for meeting housing needs, particularly for populations disparately impacted. Sammamish staff indicated in their submitted CPP Completeness Checklist that this analysis would be included in the final adopted plan.

Sammamish’s draft plan also includes numerous policies that appear to respond to gaps in policies, strategies, and partnerships to meet housing needs and to eliminate racial and other disparities in access to housing and neighborhoods of choice (e.g. Housing Element policies H.2–H.8). However, neither Volume I nor II of the draft comprehensive plan include a discrete analysis that identifies the specific gaps these policies respond to, as required by CPP H-4. Without this analysis, the AHC cannot determine the meaningfulness of these policies and their alignment with CPPs H-12 and H-20. Adding this analysis would assist in setting reasonable expectations that Sammamish’s plan responds to identified gaps in policies, strategies, and partnerships.

Recommendation 2: Sammamish should include all inventory and analysis components as required by H-3 and H-4 in their comprehensive plan and summarize findings in the Housing Element. Please see the Washington State Department of Commerce’s [“Adequate Provisions Checklists”](#) for a guide on how Sammamish could conduct a gap analysis to clarify how the plan is addressing gaps in policies, strategies, and partnerships. Sammamish should use findings from this analysis to inform policies and implementation strategies that respond to CPP H-12 and H-20.

3. Clarify community engagement findings (CPP H-8)

Relevant Countywide Planning Policies

CPP H-8 requires all jurisdictions to collaborate with and prioritize the needs of populations most disproportionately impacted by housing cost burden.

Sammamish’s Proposal and AHC Findings

Sammamish’s draft comprehensive plan summarizes extensive community engagement efforts conducted as part of plan development in the plan’s introduction (Volume I, pp.4-7), Land Use Element (Volume I, pp.21-22), and Housing Element (Volume I, page 72). However, these summaries do not describe takeaways from engagement with communities most disproportionately impacted by housing cost burden. For example, the draft plan’s RDI analysis concludes that, while cost burden is relatively low amongst households, Asian renters in Sammamish and Black renters in the recently annexed Klahanie neighborhood disproportionately pay higher percentages of their income on rent (Volume II, pp.67-69). However, the AHC did not see evidence of specific engagement with these communities or other disproportionately cost-burdened communities in King County in the draft plan.

Recommendation 3: To align with CPP H-8, Sammamish should demonstrate how they collaborated with and prioritized the needs of populations most disproportionately impacted by housing cost burden. This information should be included in either Volume I or Volume II of the draft plan.

4. Provide opportunities for affordable housing throughout Sammamish (CPPs H-9, H-18(a), and H-22)

Relevant Countywide Planning Policies

CPP H-9 requires jurisdictions to adopt intentional, targeted actions that repair harms to BIPOC households from identified past and current racially exclusive and discriminatory land use and housing practices. CPP H-18(a) requires jurisdictions to adopt inclusive planning tools whose purpose is to increase the ability of 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 providing access to affordable housing to rent and own throughout the jurisdiction, with a focus on areas of high opportunity. 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.

Sammamish’s Proposal and AHC Findings

Sammamish’s draft plan demonstrates sufficient capacity for housing typically affordable to households below 80 percent of AMI, the majority of which will be accommodated in low-rise zones

in and around town and mixed-use centers along 228th Avenue NE and in the Klahanie neighborhood. Sammamish’s plan also makes a clear effort to provide affordable housing to rent and own within the city by:

- allowing for middle housing types in residential areas within a one-quarter mile of transit and amenities;
- promoting densities that serve a range of household sizes, types, incomes, and accessibility needs through rezones and development code changes;
- committing to partnerships with external agencies to expand low-income rental and homeownership options;
- prioritizing religiously and public owned land for affordable and emergency housing;
- providing regulatory incentives for affordable housing; and
- promoting equitable development.

In addition to these strategies, the plan contains meaningful actions to build an economically diverse community in the city, which the plan’s RDI analysis states is an “applicable and pressing need” to combat the city’s exclusiveness (Volume II, page 80). Actions include:

- close the racial homeownership gap and promote access to affordable homeownership for BIPOC communities;
- promote equitable development;
- collaborate with ARCH and community and financial institutions to support and preserve affordable homeownership units and launch a downpayment assistance program; and
- facilitate the construction of affordable home types with regulatory incentives.

These efforts represent a significant step forward in terms of diversifying housing options and addressing exclusion within the City of Sammamish. However, the AHC is concerned that Sammamish’s draft plan maintains an exclusive land use pattern, wherein the City does not allow for housing types typically affordable to low-income households on the majority of its residentially zoned land.

In conversations with AHC staff, Sammamish staff noted challenges to promoting affordable housing in traditionally single-family neighborhoods, where land values and, in some cases, environmental considerations serve as significant barriers to affordable housing development. The AHC recognizes these challenges. However, the AHC encourages Sammamish to implement additional strategies for providing affordable housing to rent and own *throughout* the jurisdiction, in alignment with H-18(a). The City should also implement strategies that promote fair housing policies and practices so that residents have equitable access and opportunity to thrive in their communities of choice, in alignment with H-22. By providing more housing options and affordable housing throughout the city—particularly midrise housing that is most typically affordable to low-income households—Sammamish will meaningfully address economic exclusiveness, in alignment with CPP H-9.

Recommendation 4: To align with CPPs H-9, H-18(a), and H-22, Sammamish 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 of AMI, have access to affordable housing in the neighborhood of their choice by allowing for more mid-rise housing types and/or carefully crafting incentives for affordable housing development in areas of high opportunity throughout Sammamish. Increasing access to these neighborhoods does not necessarily mean Sammamish needs to allow multifamily housing in all residential zones. Sammamish should ensure its strategy and code changes provide feasible opportunities for the development of affordable housing. For examples of strategies Sammamish could use to align with H-18(a) and H-22, see the CPP Housing Chapter Technical Appendix.¹

In responding to this recommendation, AHC supports Sammamish staff's suggestion in their initial review meeting with AHC 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 a draft of Envision Sammamish 2044 and related submission materials. Sammamish'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.

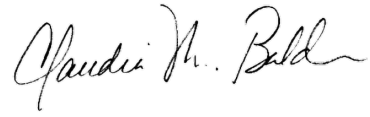
AHC staff are happy to assist Sammamish in addressing these recommendations. For immediate resources and guidance on aligning with the CPP Housing Chapter, refer to the:

- [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](#).

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.

¹ King County Countywide Planning Policies Appendix 4: Housing Technical Appendix, page 82 [\[link\]](#)

Sincerely,



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