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November 7, 2024

Robert Grumbach
Development Services Director
City of Woodinville
17301 133rd Avenue NE
Woodinville, WA 98072

Dear Mr. Grumbach,

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

1. Woodinville is a member of A Regional Coalition for Housing (ARCH) and a regular contributor to ARCH’s Housing Trust Fund, which funds affordable housing projects throughout member cities in East King County, including Woodinville. This partnership aligns well with CPPs H-6, H-7, and H-14, which require collaboration with diverse partners, including subregional entities, and prioritize local and regional resources for income-restricted housing.
2. Woodinville’s draft Housing Element policy H-10.1 commits the City to adopting inclusionary housing provisions in areas where development capacity increases are adopted in existing and/or new multifamily and mixed-use zoning districts. This aligns well with the requirements of CPPs H-10, H-18(c), and H-21, which require the adoption of policies and strategies that increase the supply of income-restricted housing and mitigate displacement risk, and evaluate the feasibility of, and implement, where appropriate, inclusionary and incentive zoning.

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

Recommendations to Align with the CPP Housing Chapter

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

1. 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 as well as summarize the findings in the Housing Element.

Woodinville’s Proposal and AHC Findings

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

- g) current population characteristics: 1) age by race/ethnicity, 2) disability; 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 Woodinville’s draft Housing Element policy H-3.1 to support housing options, programs, and services to help seniors and people with disabilities stay in their homes.

Recommendation 1: Woodinville should include all inventory and analysis components as required by CPP H-3 in the comprehensive plan and summarize the findings in the Housing Element. This additional analysis should inform additional comprehensive plan policy responses and strategies.

2. 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 the Housing Chapter.

Woodinville's Proposal and AHC Findings

As documented in Woodinville's Housing Action Plan, Woodinville conducted extensive community engagement to inform the City's draft comprehensive plan through surveys and interviewing community members, community groups, local builders, local realtors, nonprofit housing advocates, and local religious groups. The AHC commends Woodinville for this extensive outreach. However, findings from this outreach do not describe takeaways from engagement with communities most disproportionately impacted by housing cost burden. For example, Woodinville's draft Housing Element finds that Hispanic/Latino households are disproportionately affected by housing cost burden compared to other racial and ethnic groups (page 18). The AHC did not see documentation of specific engagement with these communities or other disproportionately cost-burdened communities in King County in Woodinville's submission materials or in the draft plan.

Recommendation 2: To align with CPP H-8, Woodinville should demonstrate how the City 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.

3. Increase housing options for 0 to 80 percent of area median income households in Residential zones (CPPs H-9, H-18, and H-22)

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 King County has equitable access and opportunity to thrive in their communities of choice.

Woodinville's Proposal and AHC Findings

Woodinville's comprehensive plan's Racially Disparate Impact Analysis Memorandum finds that areas zoned single-family with larger minimum lot sizes have higher proportions of White residents than other areas of the city. Comparatively, Black and Hispanic households tend to live in mixed-use zones and higher-density multifamily zones (Racially Disparate Impact Analysis Memorandum, pp. 10-11).

To allow for a greater range of housing types and options, the draft plan proposes policies to reduce disparities in access to housing (e.g., Goal H-8). This includes changes to zoning allowances in single-

family neighborhoods to include middle housing types, such as duplexes and townhomes, in compliance with 2023 House Bill 1110. It also includes the creation of the Eastrail Mixed-Use zone that will provide a range of compact low-rise and mid-rise commercial and residential developments. According to Woodinville’s land capacity analysis, all of the Eastrail Mixed-Use zone’s housing units will be affordable to households at or below 80 percent of area median income (AMI). The City also commits to “adopt inclusionary housing provisions if development capacity increases are adopted in existing and/or new multifamily and mixed-use zoning districts,” which applies to the Eastrail Mixed-Use and the Central Business District zones.

Despite efforts to promote middle housing types in single-family areas and allow for mid-rise housing types in the new Eastrail Mixed-Use zone, the AHC finds that proposed changes to zoning in these areas, taken together, do not meaningfully:

- provide affordable housing *throughout* the jurisdiction, as required by CPP H-18(a),
- promote fair housing policies and practices so that every person in King County has equitable access and opportunity to thrive in their communities of choice, as required by CPP H-22, nor
- respond to findings in the Woodinville comprehensive plan’s Racially Disparate Impact Analysis Memorandum, as required by CPP H-9.

The draft Future Land Use Map in the plan concentrates housing options for low-income households in the Eastrail Mixed-Use and Central Business District zones. Middle housing zones, on the other hand, will not be affordable to households below 80 percent of AMI. In fact, a recent ARCH report found middle housing to be affordable at a minimum to households with incomes of 140 percent of AMI or above in Woodinville.¹ This means that a majority of Woodinville’s residential areas will remain economically exclusive to low-income households, who, in King County, are also disproportionately Black and Indigenous.²

Recommendation 3: To align with CPPs H-9, H-18(a), and H-22, Woodinville 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 Woodinville needs to allow for midrise zoning in all residential zones. Any land use capacity changes should be consistent with countywide and regional requirements.

If barriers exist to increasing housing options for 0 to 80 percent of AMI households throughout Woodinville, such as the lack of sewer infrastructure, Woodinville should address such barriers.

In responding to this recommendation, the AHC encourages Woodinville 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.

¹ 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. [\[link\]](#)

² Median household income dashboard. Communities Count. 2024 [\[link\]](#)

4. Plan for residential neighborhoods that protect and promote the health and well-being of residents (CPP H-25)

Relevant Countywide Planning Policies

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.

Woodinville's Proposal and AHC Findings

The AHC commends Woodinville's plan for a new mixed-use residential zone, known as the Eastrail Mixed-Use zone, along the forthcoming Eastrail multi-use trail and Little Bear Creek. By allowing for housing types typically affordable to households below 80 percent of AMI, Woodinville is promoting the health and well-being of future low-income residents by supporting equitable access to parks, open space, and safe pedestrian and bicycle routes, in partial alignment with CPP H-25.

However, the AHC finds that that the proposed land use pattern does not protect and promote the health and well-being of residents by avoiding or mitigating potential exposure to environmental hazards and pollutants, as also required by CPP H-25. Specifically, the draft plan proposes accommodating most of its 0 to 80 percent of AMI housing needs in the Eastrail Mixed-Use zone, which in the current land use map is zoned General Commercial, adjacent to State Route 522, and nearby multiple industrial and commercial facilities.

This proposed land use pattern appears to put future residents of this zone—which, per the plan, will be low-income households at or below 80 percent of AMI—at risk of exposure to environmental hazards, such as noise and air pollution. Woodinville has not completed an Environmental Impact Statement for the proposed changes to their land use map. Without this information, the AHC cannot adequately assess if residents in the Eastrail Mixed-Use zone will be disproportionately exposed to environmental hazards and pollutants.

Recommendation 4: To align with CPP H-25, Woodinville should analyze the impacts of exposure to environmental hazards and pollutants on future residents of the newly-designated Eastrail Mixed-Use zone. Environmental impacts may include exposure to toxic air pollution from heavy automobile traffic and noise pollution. After assessing impacts, Woodinville should outline a mitigation strategy for such hazards through new policies or implementation strategies and/or propose capacity for its 80 percent and below AMI housing needs in a different part of the city, adequately distanced from air pollution sources.

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 Woodinville's draft Comprehensive Plan Update and related submission materials. Woodinville'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 Woodinville in addressing these recommendations. For immediate resources and guidance on aligning with the CPP Housing Chapter, refer to the:

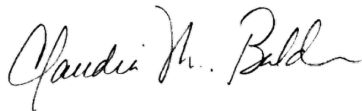
- [Engrossed 2021 King County CPPs](#);

- [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 Woodinville 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 206-848-0681.

Sincerely,



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