

Adequate Provisions Analysis Memo

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Date: October 4, 2024

Re: City of Medina 2024 Comprehensive Plan Update

Adequate Provisions

GMA requirements for housing elements include an analysis of cities codes to assess potential barriers to housing production, this is referred to as adequate provisions:

[RCW 36.70A.070\(2\)\(d\)](#) *"Makes adequate provisions for existing and projected needs of all economic segments of the community, including:*

- (i) Incorporating consideration for low, very low, extremely low, and moderate-income households;*
- (ii) Documenting programs and actions needed to achieve housing availability including gaps in local funding, barriers such as development regulations, and other limitations;*
- (iii) Consideration of housing locations in relation to employment location; and*
- (iv) Consideration of the role of accessory dwelling units in meeting housing needs;"*

The following narrative has been prepared to summarize the findings of LDC's assessment of the City of Medina's development code for barriers to housing availability and the programs or actions needed to overcome these barriers.

Moderate Density Housing Barriers

At the time of writing, Medina's zoning ordinances and municipal code do not include any implementation of moderate density housing. These barriers include prohibiting the development of moderate density housing types with exclusive zoning provisions, restrictive development regulations, limited land availability, and environmental constraints. Medina's Unified Development Code in Chapter 16 of the municipal code states that, "the primary purpose of the regulations under this title is to... protect the community's single-family residential nature and the natural aesthetic quality of the community." Exclusionary zoning makes it difficult to apply opportunities for moderate density housing within the city of Medina.

To implement moderate density housing, the City will need to overhaul their development code to bring it into consistency with recent changes brought to the GMA

by House Bill 1110. This will likely include revising the zoning use table, dimensional regulations, and parking requirements.

At the time of writing, the City has received grant funding for the completion of a Middle Housing Study and is projecting implementation of middle housing development regulations in 2025.

Low-Rise or Mid-Rise Housing Barriers

Similar to the challenges faced by moderate density housing, Medina's zoning laws and municipal regulations create significant obstacles for developing low-rise or mid-rise housing in the city. These obstacles encompass restrictions on moderate density housing types primarily through exclusive zoning. The use of exclusionary zoning removes the possibility of introducing low-rise or mid-rise housing options in Medina.

While there are substantial barriers to the development of Low-Rise and Mid-Rise Housing, the City is under no requirement to permit such housing types. At the time of writing, the City has identified a deficit in housing capacity for Affordable Housing and understands that Low-Rise and Mid-Rise housing are generally the most likely to provide affordable housing types. The City will continue to consider its options for planning for affordable housing which may include permitting Low-Rise housing types.

PSH and Emergency Housing Barriers

HB 1220 introduced new Emergency Needs Housing Requirements applicable to all jurisdictions with assigned Emergency Needs Housing targets. The City has been allocated a target of four (4) emergency beds. The bill mandates that jurisdictions must allow indoor emergency housing or shelters where hotels are permitted or within "a majority of zones within a one-mile proximity to transit." While the City does not have any zones that permit hotels, it is entirely within one mile of transit.

As of the writing of this analysis, Medina's land use regulations allow for certain supportive housing types, such as Permanent Supportive and Transitional Housing Facilities", in zones designated for single-family dwellings, subject to criteria specified in MMC 16.31.060.

To meet the requirements of HB 1220, the City will need to codify a definition of "Emergency Housing" and update its land use table to permit Emergency Housing in all zones and demonstrate emergency housing capacity through an emergency housing LCA as detailed in Sections 3 and 4 of HB 1220. The City will also need to update their use table to permit Permanent Supportive and Transitional Housing Facilities in any zones where residential structures are allowed as an outright permitted use.

Furthermore, according to Commerce guidance, the City should revise MMC 16.31.060 to eliminate requirements related to spacing (beyond 880 feet) and occupancy (other than those outlined in adopted building, fire and safety codes) to be in compliance with RCW 35A.63.240, RCW 35.21.682, RCW 35A.21.314, and RCW 36.01.227.

Accessory Dwelling Unit (ADU) Barriers

Medina's municipal code and zoning practices do not provide many barriers to the development of accessory dwelling units (ADUs) as it is a state mandated requirement that all jurisdictions follow the provisions of HB 1337. The only obstacle that could cause potential difficulties in implementing ADUs would be that there is no clear indication within the city's municipal code of permit, impact, and utility connection fees.

Addressing Affordable Housing Funding Gaps

The City regularly donates to ARCH (A Regional Coalition for Housing) but has no other identified funds for affordable housing development. The City will continue to consider its options for planning for affordable housing which may include adopting affordable housing incentives, mandatory affordable housing provisions, and fee in-lieu-of provision of affordable housing.