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*On behalf of Seattle Mayor  
Bruce Harrell*

February 6, 2025

Lara Thomas  
Community Development Director  
City of Duvall  
15535 Main Street NE  
Duvall, WA 98019

Dear Ms. Thomas,

Thank you for submitting the City of Duvall's draft Comprehensive Plan 2024-2044 to the Affordable Housing Committee's (AHC) Housing-focused Draft Comprehensive Plan Review Program for review on November 22, 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 Duvall's draft comprehensive plan. During review, the AHC noted that many of Duvall's plans, policies, analyses, and implementation strategies align well with CPP Housing Chapter policies. In particular, Duvall's Housing Action Plan demonstrates a concerted effort from the City to engage with diverse members of the community to inform housing policy, in alignment with CPP H-7. The Housing Action Plan also carefully evaluates the effectiveness of existing housing policies and strategies to meet housing needs, and clearly identifies and commits the City to address gaps in existing partnerships, policies, and dedicated resources for meeting housing needs, in alignment with CPPs H-4 and H-12.

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

### **Recommendations to Align with the CPP Housing Chapter**

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

#### **1. Identify sufficient land capacity (CPPs H-1 and H-11)**

##### Relevant Countywide Planning Policies

CPP H-1 requires that Duvall plan for and accommodate 675 units of housing affordable to households below 80 percent of area median income (AMI), including 268 non-permanent supportive housing units affordable to 0 to 30 percent of AMI, 141 permanent supportive housing units affordable to 0 to 30 percent of AMI, no units affordable to 30 to 50 percent of AMI, and 266 units affordable to 50 to 80 percent of AMI. CPP H-1 also requires Duvall to plan for and accommodate 170 emergency housing beds. CPP H-11 requires that jurisdictions identify sufficient capacity for land for moderate-, low-, very low-, and extremely low-income households, and emergency housing and shelters, and permanent supportive housing.

##### Duvall's Proposal and AHC Findings

According to Duvall's submitted land capacity analysis, the City has a deficit of land capacity for all 675 of its allocated housing units below 80 percent AMI. The City, however, does not correct for this deficit, as required by CPP H-11. Duvall's draft plan also does not contain a land capacity analysis for its emergency housing needs of 170 beds, also as required by CPP H-11. The AHC therefore finds that the City is not meaningfully planning for and accommodating its housing needs below 80 percent of AMI and its emergency housing needs.

**Recommendation 1:** To align with CPPs H-1 and H-11, Duvall should amend its draft comprehensive plan to identify sufficient capacity for extremely low- and low-income housing needs. Duvall should also amend its comprehensive plan to identify sufficient capacity for its emergency housing needs. Duvall should follow [Washington State Department of Commerce's guidance](#) for completing this land capacity analysis.

#### **2. 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.

### Duvall's Proposal and AHC Findings

While Duvall's draft plan contains policies and implementation strategies that could benefit extremely low-income households, the plan lacks policies and implementation strategies that explicitly *prioritize* housing needs below 30 percent of AMI, as required by CPP H-2.

**Recommendation 2:** To align with CPP H-2, Duvall should amend the draft plan to include policies or implementation strategies that prioritize the housing needs of extremely low-income households. For examples of strategies Duvall could use to align with CPP H-2, see the CPP Housing Chapter Technical Appendix.<sup>1</sup>

### **3. 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.

#### Duvall's Proposal and AHC Findings

While Duvall's submission includes many data points and substantive analysis, the AHC could not find specific information required by CPP H-3(b) and (m). This includes:

- b) number of existing housing units by condition; and
- m) the housing needs of Black, Indigenous, and People of Color (BIPOC) communities experiencing disproportionate harm of housing inequities.

This additional analysis should inform additional comprehensive plan policy responses and strategies. For example, analysis responsive to CPP H-3(m) could help 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, as required by CPP H-5 (see recommendation 5).

**Recommendation 3:** Duvall should include all inventory and analysis components as required by CPP H-3 in its adopted comprehensive plan and summarize the findings in the housing element. This additional analysis should inform additional comprehensive plan policy responses and strategies.

### **4. Collaborate with populations most disproportionately impacted by housing cost burden (CPP H-8)**

#### Relevant Countywide Planning Policies

CPP H-8 requires all jurisdictions to collaborate with populations most disproportionately impacted by housing cost burden in developing, implementing, and monitoring strategies that achieve the goals of the CPP Housing Chapter and prioritize the needs and solutions articulated by these disproportionately impacted populations.

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

### Duvall's Proposal and AHC Findings

Duvall's Housing Action Plan documents extensive community engagement, specifically detailing the racial profiles and income brackets of engaged residents. However, the draft comprehensive plan does not include policies or implementation strategies to “collaborate with populations most disproportionately impacted by housing cost burden” in developing and implementing strategies that achieve the goals of the CPP Housing Chapter, as required by CPP H-8. There are also no policies that explicitly commit the City to prioritizing the needs and solutions articulated by these disproportionately impacted populations.

**Recommendation 4:** To align with CPP H-8, Duvall should include policies to collaborate with populations most disproportionately impacted by housing cost burden and to prioritize the needs and solutions that they articulate, including both current residents and populations unable to afford housing within the city.

### **5. Document racially exclusive and discriminatory land use and housing practices and adopt intentional, targeted actions to repair harm (CPPs H-4, H-5, H-9, and H-20)**

#### Relevant Countywide Planning Policies

CPP H-4 requires jurisdictions 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.

CPP H-20 requires jurisdictions to address gaps in partnerships, policies, and dedicated resources to eliminate racial and other disparities in access to housing and neighborhoods of choice.

CPP H-5 requires jurisdictions to: document the local history and impact of racially exclusive and discriminatory land use and housing practices; 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; and demonstrate how current strategies are addressing impacts of those racially exclusive and discriminatory policies and practices.

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.

#### Duvall's Proposal and AHC Finding

Duvall's draft plan does not include an analysis that identifies gaps in existing partnerships, policies, and dedicated resources for eliminating racial disparities in access to housing and neighborhoods of choice, as required by CPP H-4. Without this analysis, the AHC cannot assess if Duvall is addressing gaps in partnerships, policies, and dedicated resources to eliminate racial and other disparities in access to housing and neighborhoods of choice, as required by CPP H-20.

Duvall's draft also lacks documentation of the local history of exclusive or discriminatory land use and housing practices, or an analysis of racially disparate impacts, as required by CPP H-5. Without this analysis, AHC staff cannot determine if Duvall is taking intentional, targeted actions to repair harms to BIPOC households from past and current racially exclusive and discriminatory land use and housing practices (as generally identified in CPP H-5), as required by CPP H-9.

The AHC is concerned about the lack of a racially disparate impact analysis, historical documentation of racially exclusive and discriminatory land use and housing practices, and a gaps analysis for eliminating racial and other disparities in access to housing and neighborhoods of choice, due to information that Duvall's draft housing element provides on the city's demographics, land use patterns, and economic exclusivity.

Duvall has a significantly higher proportion of White residents and a lower proportion of residents of color than the overall countywide percentage (housing element, page H-21). Duvall also appears to be economically exclusive to low-income households, who, in King County, are disproportionately Black and Indigenous.<sup>2</sup> Over 85 percent of Duvall's current housing stock is single family homes, a housing type not typically affordable to households below 120 percent of AMI. Rental and mortgage costs in the city are typically affordable to households at 120 percent of AMI and above (housing element, page H-26). Moreover, Duvall has a complete deficit of land capacity for its allocated housing needs below 80 percent of AMI, which means the city is also not meaningfully planning for and accommodating housing needs for low-income households, and by extension, creating opportunities for households of color to move to the jurisdiction.

**Recommendation 5:**

To align with CPP H-4, Duvall should include in its adopted plan an analysis that identifies 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.

To align with CPP H-20, Duvall should address any identified gaps in partnerships, policies, and dedicated resources to eliminate racial and other disparities in access to housing and neighborhoods of choice.

To align with CPP H-5, Duvall should: document the history of racially exclusive and discriminatory land use and housing practices within the city; explain the extent to which the 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; and demonstrate how current strategies are addressing impacts of those racially exclusive and discriminatory policies and practices. See "[Resources for Documenting the Local History of Racially Exclusive and Discriminatory Land Use and Housing Practices](#)" document for assistance with this analysis.

To align with CPP H-9, Duvall should adopt or clarify how proposed actions are targeted to repair harms identified in their racially disparate impacts analysis.

For examples of other strategies Duvall could use to align with CPP H-4, H-5, H-9 and H-20, see the CPP Housing Chapter Technical Appendix.<sup>3</sup>

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

<sup>3</sup> King County Countywide Planning Policies Appendix 4: Housing Technical Appendix, pp. 74 [\[link\]](#)

**6. Provide implementation strategies (CPPs H-10, H-12, H-13, H-18, H-19, H-21, H-22, H-23, and H-27)**

Relevant Countywide Planning Policies

CPP H-10 requires jurisdictions adopt policies, incentives, strategies, actions, and regulations that increase the supply of long-term income-restricted housing for extremely low-, very low-, and low-income households and households with special needs. 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-13 requires jurisdictions implement strategies to overcome cost barriers to housing affordability. CPP H-18 requires jurisdictions 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:

- 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.

CPP H-19 requires jurisdictions 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 at or less than or equal to 80 percent 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.

CPP H-21 requires jurisdictions adopt policies and strategies that promote equitable development and mitigate displacement risk, mitigate displacement that may result from planning efforts, large-scale private investments, and market pressure, and implement anti-displacement measures prior to or concurrent with development capacity increases and public capital investments. CPP H-22 requires jurisdictions 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. CPP H-23 requires jurisdictions adopt and implement policies that protect housing stability for renter households; expand protections and supports for moderate-, low-, very low-, and extremely low-income renters and renters with disabilities. CPP-24 requires jurisdictions adopt and implement programs and policies that ensure healthy and safe homes. 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 parks and open space, safe pedestrian and bicycle routes, clean air,

soil and water, fresh and healthy foods, high-quality education from early learning through K-12, affordable and high-quality transit options and living wage jobs and by avoiding or mitigating exposure to environmental hazards and pollutants. CPP H-27 requires jurisdictions submit strategies implemented during the reporting period to advance the policies of the CPP Housing Chapter.

#### Duvall's Proposal and AHC Findings

Duvall's housing element contains policies that address CPPs H-10, H-12, H-13, H-18, H-19, H-21, H-22, and H-23. This includes commitments to implement density bonuses, a multifamily housing tax exemption, a housing repair program, and notice of intent to sell program (e.g. Policies H 1.4, H 4.7, H 4.17, and H-4.1). However, implementation strategies submitted for these policies do not provide details on the specific steps or timelines the City will follow to implement these policies over the course of the planning period.

As the City noted in its CPP completeness checklist, the Housing Action Plan's Implementation Strategy chapter contains a list of detailed implementation strategies (HAP, pg. 245). However, because the submission does not link these specific strategies to the CPP Housing Chapter policies that they advance, the AHC struggled to assess the meaningfulness of this plan's alignment with CPP requirements to implement and adopt policies that:

- increase the supply of long-term income restricted housing for extremely low-, very low-, and low-income households and households with special needs, in alignment with CPP H-10;
- improve effectiveness of existing housing policies and strategies and address gaps in partnerships, policies, and dedicated resources to meet housing needs and eliminate racial and other disparities in access to housing and neighborhoods of choice, in alignment with CPPs H-12 and H-20;
- overcome cost barriers to housing affordability, in alignment with CPP H-13;
- 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, in alignment with CPP H-18;
- lower barriers to and promote access to homeownership for extremely low-, very low-, and low-income households, in alignment with CPP H-19;
- promote equitable development, and mitigate displacement risk and displacement that may result from planning efforts, large-scale private investments, and market pressure, in alignment with CPP H-21;
- implement, promote, and enforce fair housing policies and practices, in alignment with CPP H-22;
- protect housing stability for renter households, and expand protections and supports for moderate-, low-, very low-, and extremely low-income renters and renters with disabilities, in alignment with CPP H-23;
- ensure healthy and safe homes, in alignment with CPP H-24; and
- protect and promote the health and well-being of residents, in alignment with CPP H-25.

**Recommendation 6:** Duvall should submit more detailed implementation strategies to the AHC in 2025 for policies that align with CPPs H-10, H-12, H-13, H-18, H-19, H-21, H-22, and H-23. Specifically, Duvall should integrate Housing Action Plan implementation strategies that align with these CPPs into the implementation strategies they submit to the AHC.

## **Conclusion and AHC Resources**

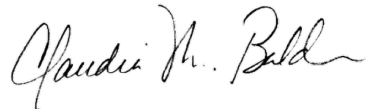
Thank you again for your submission to the Committee’s Housing-focused Draft Comprehensive Plan Review Program. AHC members valued the opportunity to review Duvall’s draft Comprehensive Plan 2024-2044 and related submission materials. Duvall’s participation in the plan review program is instrumental 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 Duvall 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](mailto:AHCplanreview@kingcounty.gov) or 206-848-0681.

Sincerely,



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