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May 20, 2024

Tawni Dalziel, Director
Public Works and Community Development
City of Maple Valley
22017 SE Wax Road, Suite 200
Maple Valley, WA 98038

Dear Ms. Dalziel,

Thank you for submitting the City of Maple Valley's draft comprehensive plan to the Affordable Housing Committee (AHC) for review on March 11, 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.

AHC members appreciate Maple Valley being one of the first jurisdictions to submit to the program in 2024. This program is still relatively new and evolving, and your engagement helped 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 Maple Valley's Draft Comprehensive Plan. Many of the proposed policies and analyses prepared to inform the policies align well with CPP Housing Chapter policies. In particular,

1. Maple Valley, a member of South King Housing and Homelessness Partners (SKHHP), committed to contribute a portion of funds from the housing and related services sales tax to SKHHP to support the development of affordable housing. This partnership, outlined in Maple Valley's implementation strategies to their proposed Housing Element policy HO-P1.4, aligns with CPPs that promote regional collaboration and require adoption of policies that increase housing supply, particularly for households with the greatest needs (see CPPs H-6, H-12, H-13, and H-14).
2. Maple Valley proposes to explore a partnership with the Soos Creek Water and Sewer District to replace septic with sewer infrastructure in certain residential areas. If implemented, this partnership, outlined in Housing Element policy HO-P1.4, has the potential to create opportunities for greater levels of housing density and diversity across the City. The partnership and commitment to engagement with impacted communities, in the event that sewer is extended, align well with CPPs H-6, H-19, H-24, and H-25.

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

Recommendations to Align with the CPP Housing Chapter

Maple Valley needs to take the following actions to align its comprehensive plan with CPP Housing Chapter goals and policies.

1. Address racial disparities in homeownership and cost burden (CPPs H-4, H-9, H-19, H-20)

Relevant Countywide Planning Policies

CPP H-4 requires all jurisdictions to identify gaps for meeting housing needs and eliminating racial and other disparities in access to housing and neighborhoods of choice. CPP H-9 requires all jurisdictions to adopt intentional, targeted actions that repair harms from identified past and current racially exclusive and discriminatory land use and housing practices. CPP H-19 requires all jurisdictions to lower barriers to and promote access to affordable homeownership for extremely low-, very low-, and low-income households and emphasize remedying historical inequities in and expanding access to homeownership opportunities for Black, Indigenous, and People of Color (BIPOC) communities. CPP H-20 requires all jurisdictions to address gaps in partnerships, policies, and dedicated resources to eliminate racial and other disparities in access to housing.

Maple Valley's Proposal and AHC Findings

Maple Valley's Housing Element Technical Appendix identifies racial disparities in homeownership and cost burden rates among their residents (Chapter 1, pp.11,13). While Maple Valley proposes a number of strategies to improve housing affordability, such as those identified in Housing Element Policy HO-P1.4, the plan does not articulate how these strategies respond to the racial disparities identified in their Housing Element Technical Appendix. Additionally, proposed Housing Element policy HO-P4.2 states "If [racially disparate impacts and displacement risk levels identified in the Housing Element] trends monitored...are worsening, review City plans, policies, and codes and update as needed to improve outcomes." While the AHC celebrates Maple Valley's commitment to monitoring and responding to future racially disparate impacts, Maple Valley should also commit to

address current racial disparities in homeownership and cost burden in their comprehensive plan in order to align with CPP H-9.

Recommendation 1: To align with CPP H-9, Maple Valley should amend policy HO-P4.2 to address racially disparate impacts soon after plan adoption. To align with CPPs H-4, H-9, H-19, and H-20, Maple Valley should amend its Housing Element to clarify how its existing policies or include a new policy to address racial disparities in homeownership rates and cost burden. For examples of strategies Maple Valley could use to align with CPPs, see the CPP Housing Chapter Technical Appendix.¹

2. 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.

Maple Valley's Proposal and AHC Findings

According to Maple Valley's Housing Element Technical Appendix, BIPOC households are more likely to be housing cost burdened than White households and very low-income and extremely low-income households are much more likely to be severely cost burdened than any other income group (Chapter 1, pp.13). The Targeted Engagement Summary section of Maple Valley's Community Engagement Appendix of the Draft Comprehensive Plan summarizes takeaways from engagement with impacted communities² and housing developers (pp.3-11). However, the provided summary combines input from impacted communities and housing developers. Disaggregating input from impacted communities in the Target Engagement Summary will allow Maple Valley to clearly demonstrate how they are prioritizing "populations most disproportionately impacted by housing cost burden" in the plan.

Recommendation 2: To align with CPP H-8, Maple Valley should disaggregate input from community engagement to clarify how the plan prioritizes the needs of populations disproportionately impacted by housing cost burden.

3. Prioritize extremely low-income households (CPPs H-2, H-12, H-14)

Relevant Countywide Planning Policies

CPP H-2 requires all jurisdictions to prioritize the need for housing affordable to households less than or equal to 30 percent area median income (AMI). CPP H-12 requires all jurisdictions to adopt and implement policies that address gaps in policies and dedicated resources to meet housing needs. CPP H-14 requires all jurisdictions to prioritize resources for income-restricted housing, particularly for extremely low-income households, populations with special needs, and others with disproportionately greater housing needs.

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

² The Target Engagement Summary of Maple Valley's plan defines these community members as "people with low incomes, people who are BIPOC (Black, Indigenous, or People of Color), youth and young families, renters, people with disabilities, and people experiencing homelessness" (pp.2).

Maple Valley's Proposal and AHC Findings

Maple Valley demonstrates sufficient capacity for its housing needs of 827 units affordable to 0 to 30 of AMI. The plan also proposes to remove barriers to the production of affordable housing, including barriers to permanent supportive housing (Housing Technical Appendix, Chapter 1, pp.17). However, Maple Valley's Housing Technical Appendix also states there are no income-restricted housing units in Maple Valley affordable to extremely low-income households (households with incomes at or below 30 percent of AMI), demonstrating a clear gap in current policies to meet extremely low-income housing needs (Housing Technical Appendix, Chapter 1, pp.17). The AHC did not see policies and companion implementation strategies that clearly and specifically demonstrate how the City is addressing this gap or prioritizing housing needs of extremely low-income households in Maple Valley's Draft Housing Element and other submission materials.

Recommendation 3: To align with CPP H-2, H-12, and H-14, Maple Valley should include additional or revised policies and/or implementation strategies that:

- increase the availability of long-term housing affordable to households earning 0 to 30 percent of AMI; and
- explicitly prioritize extremely low-income households.

For examples of strategies jurisdictions could use to align with the CPPs, see the CPP Housing Chapter Technical Appendix

4. Increase housing options for 0 to 80 percent AMI households in Residential zones (CPPs H-9, H-18(a), H-25)

Relevant Countywide Planning Policies

CPP H-9 requires all jurisdictions to adopt intentional, targeted actions that repair harms to 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-25 requires all jurisdictions to 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 kindergarten through twelfth grade, affordable and high-quality transit options and living wage jobs and by avoiding or mitigating exposure to environmental hazards and pollutants.

Maple Valley's Proposal and AHC Findings

Maple Valley's Draft Comprehensive Plan proposes to accommodate the majority of the City's 0 to 80 percent AMI housing needs the City's Community Business, Regional Learning & Technology Center, and Downtown zones. The City's remaining residential land capacity is in Residential zones. This proposed land use pattern represents an important step forward in Maple Valley to accommodate more housing affordable to 0 to 80 of AMI households. However, the AHC finds that Maple Valley's proposed land use pattern does not: 1) meaningfully increase affordable options for low income households "throughout" the city, with a focus on high opportunity areas (CPP H-18(a)),

2) represent a targeted and intentional action to repair harm caused by racially exclusive and discriminatory land use patterns (CPP H-9), and 3) plan for residential neighborhoods that protect and promote the health and well-being of residents (CPP H-25). Specifically, the AHC notes that:

1. The plan appears to limit housing options affordable to households at or below 80 percent of AMI in Residential zones, which encompass the majority of the City's land area (CPP H-18(a)).³ Maple Valley's land capacity analysis anticipates that Residential zones will largely accommodate housing affordable to households above 120 percent of AMI, with some capacity for accessory dwelling units (ADUs). Per the plan, ADUs could be affordable to households between 0 to 80 percent of AMI. Yet, the plan predicts only 42 ADUs will develop during the planning period (Housing Technical Appendix Chapter 2, pp.3, 9-10). Moreover, the plan does not set reasonable expectations that ADUs will be affordable to low-income households because it does not include information on expected rents for ADUs or subsidies available to reduce costs (Housing Technical Appendix, Chapter 1, pp. 18).
2. Maple Valley conducted a thorough, thoughtful, and community-informed racially disparate impact analysis that includes documentation of the local history of racially exclusive and discriminatory land use and housing practices and a segregation analysis. The segregation analysis finds no notable segregation within Maple Valley, but notes that "its demographics are fairly exclusive compared to the region" (Housing Technical Appendix, Chapter 1, pp.22). The plan's historical documentation concludes "single-family zoning patterns...generally made housing in the city less accessible to people of color" and that "[a]ffordability seems to be the main barrier to reducing racially disparate impacts in the city today" (Housing Technical Appendix, Chapter 1, pp.21). This analysis and acknowledgement is an important first step for Maple Valley in a process to repair harm to people of color caused by exclusive zoning patterns. The City is also taking steps to allow more access to the jurisdiction as a whole by adding additional low-rise housing capacity in the jurisdiction. However, the proposed plan does not appear to meaningfully take "intentional, targeted action" to address the stated exclusivity and unaffordability of single-family areas specifically, the majority of which are zoned Residential (CPP H-9).
3. The plan appears to place disproportionate environmental and health burdens—specifically exposure to heavy automobile traffic, air pollutants, and noise—on the City's future low-income residents (CPP H-25). This is because the plan proposes to accommodate the majority of its 0 to 80 housing needs in areas adjacent to State Route 169, a major arterial. Moreover, Community Business zones, where the plan proposes to accommodate over half of the City's 0 to 80 percent of AMI housing needs, allow for a "broad range of commercial uses...including those which typically...generate noise and traffic impacts as a part of their operations" (Land Use Element, pp.6). Maple Valley's zoning code includes provisions which aim to limit exposure to pollutants and noise.⁵ The City is also taking significant steps to transform the Downtown area into a "walkable, attractive, and economically vibrant mixed-use center in the heart of the City, with multimodal connectivity in all four directions" (Land

³ Puget Sound Regional Council. Opportunity Mapping. [\[link\]](#)

⁴ Per Maple Valley staff, provisions include setback and landscaping requirements along right of ways. An existing noise ordinance limits the amount of noise that commercial operations may generate from the hours of 10 a.m. to 7 a.m. on weekdays and 10 p.m. to 8 a.m. on weekends.

Use Element, pp.6).⁵ The AHC remains concerned, however, that future low-income housing development will be limited to areas with relatively more exposure to pollutants and noise than current Residential zones.

Recommendation 4: To align with CPPs H-9, H-18(a), and H-24, Maple Valley 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” (CPP H-18), particularly in Residential zones. Increasing access does not necessarily mean Maple Valley needs to allow midrise multifamily housing in all Residential zones. Any land use capacity changes should be consistent with county and regional requirements. For examples of strategies Maple Valley could use to align with the CPPs, see Table H-3 in the CPP Housing Chapter Technical Appendix.

5. Complete the housing inventory and analysis (CPP H-3)

Relevant Countywide Planning Policies

CPP H-3 requires all 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.

Maple Valley’s Proposal and AHC Findings

While Maple Valley’s submission includes many data points and substantive analysis, the AHC could not find the specific information required by H-3(h), and incomplete information required by H-3(f). This includes:

- f. Household characteristics, by race/ethnicity; and
- h. Projected population growth.

Maple Valley’s Housing Element Technical Appendix lacks data on projected population growth. If this data is presented elsewhere in the plan, Maple Valley should note it accordingly. Also, Maple Valley provides data on median income using the categories “White alone, not Hispanic” and “BIPOC overall,” rather than disaggregating data by race and ethnicity (Housing Technical Appendix, Chapter 1, pp.13). Races and ethnicities that fall within the BIPOC category likely do not have the same economic characteristics. This information should be disaggregated to accurately represent Maple Valley’s community. Maple Valley should describe any statistical limitations or other reasons to not disaggregate this data, if relevant.

Recommendation 5: Maple Valley 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. Maple Valley should provide a rationale, such as statistical limitations, if it chooses not to include specified data points. Additional analysis should inform additional comprehensive plan policy responses and strategies.

⁵ Per Maple Valley staff, new design standards aim to create a high-quality urban environment in Downtown zones. Future redevelopment of the Legacy Site adjacent to Downtown may also bring public space, recreation, and gathering places for future residents.

Conclusion and AHC Resources

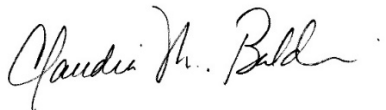
Thank you again for your submission to the Committee's housing-focused comprehensive plan review program. AHC members valued the opportunity to review Maple Valley's Draft Comprehensive Plan Elements for Public Review and related submission materials. Maple Valley's participation in the plan review program 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 Maple Valley 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](#);
- [King County Resources for Documenting the Local History of Racially Exclusive and Discriminatory Land Use and Housing Practices guidance](#); and
- [Countywide Planning Policies Housing Chapter Frequently Asked Questions](#).

If you have questions or need additional information regarding aligning with the CPP Housing Chapter, please contact AHC staff at AHCplanreview@kingcounty.gov.

Sincerely,



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King County Councilmember, District 6

CC Dow Constantine
Growth Management Planning Council Chair
King County Executive

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