From:	Anastasia Maier
To:	Compplan; kcexec@kingcounty.gov; Permitting Inquiries
Cc:	planning@duvallwa.gov; amy.mchenry@duvallwa.gov; adam.olen@duvallwa.gov; linda.conway@duvallwa.gov; sara.taylor@duvallwa.gov; ronn.mercer@duvallwa.gov; mike.supple@duvallwa.gov; paul.wiggins; jennifer.hernandez@duvallwa.gov
Subject:	Land Clinic - Request to Reconcile the City of Duvall's 2019–2044 Housing Growth Target
Date:	Wednesday, October 14, 2026 10:11:53 AM
Attachments:	[Land Clinic] GMA_Target_Reconciliation_Request.pdf [Land Clinic]_SEPA_Comment_Letter_FINAL.pdf

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Dear Executive Zahilay,

Please find attached Land Clinic's comment letters for (1) CPU24-01/CA26-005; SEPA File No. 20260417 and (2) reconciliation request for the city of Duvall.

Thank you,

Land Clinic *is a project of* ***Ojai Law Corporation*** *and fiscally sponsored by* ***Ecologistics Inc.****, a 501(c)(3) California nonprofit corporation. This email is confidential and/or privileged and intended only for the addressee.*

From:	Anastasia Maier
To:	girmay.zahay@kingcounty.gov; Compplan; kcexec@kingcounty.gov; Permitting Inquiries
Cc:	planning@duvallwa.gov; amy.mchenry@duvallwa.gov; adam.olen@duvallwa.gov; linda.conway@duvallwa.gov; sara.taylor@duvallwa.gov; ronn.mercer@duvallwa.gov; mike.supple@duvallwa.gov; paul.wiggins; jennifer.hernandez@duvallwa.gov
Subject:	March of the Vegetables - Request to Reconcile the City of Duvall's 2019–2044 Housing Growth Target
Date:	Wednesday, October 14, 2026 9:20:32 AM
Attachments:	[MoV] SEPA_EIS_Demand_Letter_Organizations-FINAL.pdf [MoV] GMA_Target_Reconciliation_Request - FINAL.pdf

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Dear Executive Zahilay,

I write on behalf of a small organization called March of the Vegetables located in the Snoqualmie Valley. We are concerned about a pending SEPA application submitted by the City of Duvall in response to their comprehensive plan updates. Please see our attached letter regarding our reconciliation request under GMA and our SEPA comment to the city. I will also be sending one on behalf of Land Clinic later today.

Thank you,

Land Clinic *is a project of* ***Ojai Law Corporation*** *and fiscally sponsored by* ***Ecologistics Inc.****, a 501(c)(3) California nonprofit corporation. This email is confidential and/or privileged and intended only for the addressee.*

From:	Terry Mandeville
To:	kcexec@kingcounty.gov; Constantine, Dow; Balducci, Claudia; Jennifer.Robertson@kingcounty.gov; jrobertson@bellevuewa.gov; Compplan; KCGIS Center
Cc:	planning@duvallwa.gov; cityclerk@duvallwa.gov
Subject:	Request to Reconcile the City of Duvall's 2019–2044 Housing Growth Target (King County Countywide Planning Policies; RCW 36.70A.210 / 36.70A.215)
Date:	Saturday, October 10, 2026 9:27:48 AM

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10/10/2026

The Honorable Girmay Zahilay, King County Executive
401 Fifth Avenue, Suite 800
Seattle, WA 98104

King County Growth Management Planning Council
c/o King County Office of Performance, Strategy and Budget, Regional Planning

CC: City of Duvall Planning Division, planninCity of Duvall Mayor and City Council

Re: Request to Reconcile the City of Duvall's 2019–2044 Housing Growth Target (King County Countywide Planning Policies; RCW 36.70A.210 / 36.70A.215)

Dear Executive Zahilay and Members of the Growth Management Planning Council:

I am a 74 year resident of King County, and a 15 year resident of greater Duvall, Washington. I respectfully request that King County and the Growth Management Planning Council (GMPC) reconcile the City of Duvall's 2019–2044 housing growth target, and that the City of Duvall initiate and support that reconciliation. Duvall is attempting to meet an allocation it cannot absorb on environmentally unconstrained land, and the result, a citywide up-zone, is being advanced without the environmental review the Growth Management Act and SEPA require.

Under the Countywide Planning Policies (adopted by King County Ordinance 19384 and updated by Ordinance 19553), Duvall's housing target is 890 additional dwelling units for 2019–2044. The City's own land capacity analysis found that Duvall does not have sufficient land, at the lower income bands, to accommodate that allocation, a documented deficit of land zoned to accommodate 675 units affordable at or below 80% of area median income.

Duvall is a small Lower Snoqualmie Valley city by the Snoqualmie River and Cherry Creek corridors, with extensive floodplains, wetlands, geologically hazardous slopes, and salmon-bearing streams. Much of its land is encumbered by exactly the kind of environmental constraints that make the allocation difficult to meet without pushing development intensity toward sensitive areas.

The Act's review-and-evaluation ("buildable lands") process directs jurisdictions to identify "reasonable measures, other than adjusting

urban growth areas," and to use that process "as part of the next comprehensive plan update to reconcile inconsistencies" between assumed targets and the capacity of land that can actually be developed (RCW 36.70A.215). The City of Snoqualmie has already invoked this path: by letter dated March 7, 2024 from its Mayor to the King County Executive, Snoqualmie requested reconciliation of its 2044 housing target, citing a lack of land "not already encumbered by environmental constraints such as floodway and floodplain." Duvall is similarly situated, and I understand the County may revisit its growth-target allocations beginning in 2025.

Requested action. I respectfully request that:
King County and the GMPC evaluate and reconcile Duvall's 2019–2044 housing allocation in light of the City's documented land-capacity deficit and environmental constraints, and housing constructed since 2019, consistent with RCW 36.70A.210 and 36.70A.215 and the process used for the City of Snoqualmie; and
The City of Duvall formally initiate and support a reconciliation request, document the mismatch between its allocation and its already degraded traffic conditions, and environmentally constrained buildable-land supply as part of the review-and-evaluation record, and calibrate any rezoning to the capacity that unconstrained, serviceable land can actually absorb — consistent with its obligations under House Bills 1110 and 1220.

I am not asking the County or the City to abandon Duvall's housing responsibilities. I am asking that the target, and the zoning adopted to meet it, be reconciled with the real environmental capacity of the land — through the process the GMA provides — rather than forced onto a constrained valley without adequate environmental review.

Thank you for your consideration. Please add me to the notification list for any proceedings relating to the Countywide Planning Policies and Duvall's growth-target allocation.

Respectfully submitted,
Terry M. Mandeville
19921 330th Ave. NE
Duvall, WA 98019
terrymand@aol.com
206-498-8845 / 425-844-2894

From:	jenithea@cablespeed.com
To:	kcexec@kingcounty.gov; Compplan; Permitting Inquiries
Cc:	planning@duvallwa.gov; amy.mchenry@duvallwa.gov; adam.olen@duvallwa.gov; linda.conway@duvallwa.gov; sara.taylor@duvallwa.gov; ronn.mercer@duvallwa.gov; mike.supple@duvallwa.gov; paul.wiggins; jennifer.hernandez@duvallwa.gov
Subject:	Request to Reconcile the City of Duvall's 2019–2044 Housing Growth Target (King County Countywide Planning Policies; RCW 36.70A.210 / 36.70A.215)
Date:	Thursday, October 15, 2026 10:09:07 AM

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Dear Executive Zahilay and Members of the Growth Management Planning Council:

I respectfully request that King County and the Growth Management Planning Council (GMPC) reconcile the City of Duvall's 2019–2044 housing growth target, and that the City of Duvall initiate and support that reconciliation. Duvall is attempting to meet an allocation it cannot absorb on environmentally unconstrained land, and the result, a citywide up-zone, is being advanced without the environmental review the Growth Management Act and SEPA require.

Under the Countywide Planning Policies (adopted by King County Ordinance 19384 and updated by Ordinance 19553), Duvall's housing target is 890 additional dwelling units for 2019–2044. The City's own land capacity analysis found that Duvall does not have sufficient land, at the lower income bands, to accommodate that allocation, a documented deficit of land zoned to accommodate 675 units affordable at or below 80% of area median income. Duvall is a small Lower Snoqualmie Valley city by the Snoqualmie River and Cherry Creek corridors, with extensive floodplains, wetlands, geologically hazardous slopes, and salmon-bearing streams. Much of its land is encumbered by exactly the kind of environmental constraints that make the allocation difficult to meet without pushing development intensity toward sensitive areas.

The Act's review-and-evaluation ("buildable lands") process directs jurisdictions to identify "reasonable measures, other than adjusting urban growth areas," and to use that process "as part of the next comprehensive plan update to reconcile inconsistencies" between assumed targets and the capacity of land that can actually be developed (RCW 36.70A.215). The City of Snoqualmie has already invoked this path: by letter dated March 7, 2024 from its Mayor to the King County Executive, Snoqualmie requested reconciliation of its 2044 housing target, citing a lack of land "not already encumbered by environmental constraints such as floodway and floodplain." Duvall is similarly situated, and we understand the County may revisit its growth-target allocations beginning in 2025.

Requested action. We respectfully request that:

1. **King County and the GMPC** evaluate and reconcile Duvall's 2019–2044 housing allocation in light of the City's documented land-capacity deficit and environmental constraints, and housing constructed since 2019, consistent with RCW 36.70A.210 and 36.70A.215 and the process used for the City of Snoqualmie; and
2. **The City of Duvall** formally initiate and support a reconciliation request, document the mismatch between its allocation and its already degraded traffic conditions, and environmentally constrained buildable-land supply as part of the review-and-evaluation record, and calibrate any rezoning to the capacity that unconstrained, serviceable land can actually absorb — consistent with its obligations under House Bills 1110 and 1220.
3. **Pause the excess up-zone until a real affordability plan exists.** Because the overall housing target is nearly met, we ask the City to hold off on adopting the capacity-increasing up-zone until it completes a realistic, evidence-based plan for producing genuinely affordable housing. Pausing the excess rezoning keeps Duvall's limited buildable land available for the housing the community actually needs, and has been mandated by the State, instead of committing it before the analysis is done.

We are not asking the County or the City to abandon Duvall's housing responsibilities. We are asking that the target, and the zoning adopted to meet it, be reconciled with the real environmental capacity of the land — through the process the GMA provides — rather than forced onto a constrained valley without adequate environmental review.

Thank you for your consideration. Please add me to the notification list for any proceedings relating to the Countywide Planning Policies and Duvall's growth-target allocation.

Respectfully submitted,

Jennifer Shepherd
P.O. Box 635
Duvall, WA 98019
jenithea@cablespeed.com

From: Auzins, Erin (EXEC)
To: "grace@gracewoodscounseling.com"
Cc: kcexec@kingcounty.gov; planning@duvallwa.gov
Subject: FW:
Date: Friday, October 16, 2026 4:11:00 PM
Attachments: ~WRD0000.jpg
image001.png

Hi Grace,

Thank you for your email. I will make sure that your letter is sent to the Growth Management Planning Council in advance of their next meeting.

Erin Auzins (she/her)
Regional Planning Lead
o: 206-848-0121 | c. 206-928-4513 | eauzins@kingcounty.gov



From: Grace Woods <grace@gracewoodscounseling.com>
Sent: Thursday, October 15, 2026 10:50 AM
To: kcexec@kingcounty.gov
Cc: planning@duvallwa.gov
Subject:

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Grace Woods Counseling
10/15/26

The Honorable King County Executive Girmay Zahilay; King County Executive 401 Fifth Avenue, Suite 800 Seattle, WA 98104
King County Growth Management Planning Council c/o King County Office of Performance, Strategy and Budget, Regional Planning
CC: City of Duvall Planning Division, planning@duvallwa.gov City

of Duvall Mayor and City Council

Re: Request to Reconcile the City of Duvall's 2019–2044 Housing Growth Target (King County Countywide Planning Policies; RCW 36.70A.210 / 36.70A.215)

Dear Executive Zahilay and Members of the Growth Management Planning Council:

Grace Woods Counseling, PLLC, respectfully requests that King County and the Growth Management Planning Council (GMPC) reconcile the City of Duvall's 2019–2044 housing growth target, and that the City of Duvall initiate and support that reconciliation. Duvall is attempting to meet an allocation it cannot absorb on environmentally unconstrained land, and the result, a citywide up-zone, is being advanced without the environmental review the Growth Management Act and SEPA require.

Under the Countywide Planning Policies (adopted by King County Ordinance 19384 and updated by Ordinance 19553), Duvall's housing target is 890 additional dwelling units for 2019–2044. The City's own land capacity analysis found that Duvall does not have sufficient land, at the lower income bands, to accommodate that allocation, a documented deficit of land zoned to accommodate 675 units affordable at or below 80% of area median income. Duvall is a small Lower Snoqualmie Valley city by the Snoqualmie River and Cherry Creek corridors, with extensive floodplains, wetlands, geologically hazardous slopes, and salmon-bearing streams. Much of its land is encumbered by exactly the kind of environmental constraints that make the allocation difficult to meet without pushing development intensity toward sensitive areas.

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Requested action. We respectfully request that:

1. **King County and the GMPC** evaluate and reconcile Duvall's 2019–2044 housing allocation in light of the City's documented land-capacity deficit and environmental constraints, and housing constructed since 2019, consistent with RCW 36.70A.210 and 36.70A.215 and the process used for the City of Snoqualmie; and
2. **The City of Duvall** formally initiate and support a reconciliation request, document the mismatch between its allocation and its already degraded traffic conditions, and environmentally constrained buildable-land supply as part of the review-and-evaluation record, and calibrate any rezoning to the capacity that unconstrained, serviceable land can actually absorb — consistent with its obligations under House Bills 1110 and 1220.

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We are not asking the County or the City to abandon Duvall's housing responsibilities. We are asking that the target, and the zoning adopted to meet it, be reconciled with the real environmental capacity of the land — through the process the GMA provides — rather than forced onto a constrained valley without adequate environmental review.

Thank you for your consideration. Please add [Organization / Coalition name] to the notification list for any proceedings relating to the Countywide Planning Policies and Duvall's growth-target allocation.

Respectfully submitted,

Grace Woods, MA, LMFTA, Owner--Grace Woods Counseling, grace@gracewoodscounseling.com, (206) 910-6677, 26525 NE Cherry Valley RD, TRLR J, Duvall, WA 98019

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Image removed by sender.

