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November 5, 2026

Mona Davis
Community and Economic Development Director
City of Snoqualmie
38624 SE River Street
Snoqualmie, WA 98065

Dear Ms. Davis,

Thank you for submitting proposed amendments to the City of Snoqualmie's adopted Snoqualmie 2044 Comprehensive Plan to the Affordable Housing Committee's (AHC) Housing-focused Draft Comprehensive Plan Review Program. 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.

The AHC acknowledges the substantial amount of time and effort that went into preparing Snoqualmie's comprehensive plan and subsequent plan amendments. The City of Snoqualmie first submitted its draft comprehensive plan for AHC review on September 11, 2024, but elected to defer review pending the outcome of a reconciliation request to reduce the City's housing growth targets and shares of

countywide housing need.[1] The Snoqualmie City Council subsequently adopted its periodic update to its comprehensive plan on December 9, 2024, before that request was resolved.[2] The request then took effect through King County Council adoption of amendments to the CPPs in July 2025, and ratification by the cities in October 2025.[3] On September 18, 2026, the City submitted to the AHC a set of amendments to its adopted periodic update, intended, in part, to bring the plan into compliance with the CPP Housing Chapter.

During review of the proposed plan amendments and related materials, the AHC noted that many of Snoqualmie's policies, analyses, and implementation strategies align well with CPP Housing Chapter policies. In particular:

1. Snoqualmie provides ample evidence of efforts to increase housing supply, particularly for households with the greatest needs. Snoqualmie is using several tools to fund and encourage affordable housing. Its Adequate Provisions Checklist documents a housing and related services sales tax (Ordinance No. 1232, 2020), an affordable housing sales tax credit (Resolution No. 1529, 2019), a Multifamily Tax Exemption program with an affordability requirement (Ordinance No. 1280, 2023), and authority to donate surplus public land for affordable housing (Ordinance No. 826, 1998) (Housing Element Supplement, Exhibit B5). The City has also redesignated and rezoned several vacant City-owned parcels outside the floodplain to allow multifamily housing. The proposed code update would add a density, height, or bulk bonus for housing that serves very low- and extremely low-income households. The bonus would apply in the Form-Based Mixed-Use zone and on land owned by governments, tribes, religious organizations, and nonprofits, and qualifying affordable housing would not be required to provide off-street parking. Together, these actions align with CPPs H-10, H-12, and H-14.

2. Snoqualmie's housing needs analysis is thorough and thoughtful and includes all data points required by CPP H-3. This analysis gives the City a strong foundation for aligning its policies and implementation strategies with CPP Housing Chapter requirements and local housing needs.

Recommendations to Align with the CPP Housing Chapter

The AHC recommends Snoqualmie take the following action to align its comprehensive plan with CPP Housing Chapter goals and policies.

1. Identify sufficient capacity of land for housing needs (CPPs H-1 and H-11)

Relevant Countywide Planning Policies

CPP H-1 requires Snoqualmie to plan for and accommodate:

- 269 emergency housing beds,
- 374 non-permanent supportive housing units affordable to 0 to 30 percent of area median income (AMI) households,
- 244 permanent supportive housing units affordable to 0 to 30 percent of AMI households,
- 117 units affordable to 30 to 50 percent of AMI households, and
- 16 units affordable to 50 to 80 percent of AMI households.

[1] Affordable Housing Committee. (December 13, 2024). Reconciliation Letter to the City of Snoqualmie. [link]
[2] City of Snoqualmie. (December 9, 2024). Snoqualmie 2044: City of Snoqualmie Comprehensive Plan. (Ordinance 1302). [link]
[3] King County. (July 1, 2025). 2021 King County Countywide Planning Policies. (Ordinance 19946). [link]

Sufficient planning and accommodations are those that comply with the Growth Management Act requirements for housing elements in Revised Code of Washington 36.70A.020 and 36.70A.070, outline regulatory and nonregulatory measures to implement the comprehensive plan (Washington Administrative Code 365-196-650), and comply with policies articulated in the CPP Housing Chapter.

CPP H-11 requires jurisdictions to identify sufficient capacity of land for housing including, but not limited to, income-restricted housing; housing for moderate-, low-, very low-, and extremely low-income households; manufactured housing; multifamily housing; group homes; foster care facilities; emergency housing; emergency shelters; permanent supportive housing; and within an urban growth area boundary, duplexes, triplexes, and townhomes.

Snoqualmie's Proposal and AHC Findings

The City's Housing Element amendment presents two Future Land Use options for City decision-makers: Option A, which corresponds to Scenario 3 in the Housing Element Supplement, and Option B, which corresponds to Scenario 5. The AHC finds that Option B is the only option presented that identifies sufficient capacity for Snoqualmie's allocated housing needs.

Option A relies on future annexation of land in the Snoqualmie Potential Annexation Area (PAA). Until annexed, that land remains unincorporated and is governed by King County's comprehensive plan and zoning. The City must demonstrate that sufficient zoned residential capacity for its housing needs exists within its current jurisdiction. Potential future annexation cannot satisfy that requirement.

Recommendation 1: To align is comprehensive plan with CPPs H-1 and H-11, the City of Snoqualmie should adopt an amendment to the comprehensive plan that uses proposed Option B as the land use assumption in its comprehensive plan. The City may describe potential zoning and annexation in the PAA as supplemental information but should not count capacity on that land towards its ability to accommodate the housing needs allocated to Snoqualmie under CPP H-1.

The AHC encourages the City to consult legal counsel regarding recent Growth Management Hearings Board (GMHB) decisions on land capacity analysis and adequate provisions requirements. The City should review the Department of Commerce's *Guidance for Updating Your Housing Element* (Book 2), updated in response to GMHB cases as of January 2026.[4]

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 amendments to the City of Snoqualmie's adopted Snoqualmie 2044 Comprehensive Plan and related submission materials. Snoqualmie'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.

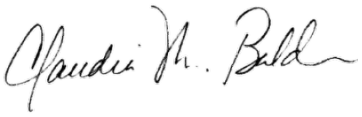
[4] Snoqualmie staff alerted AHC staff that on October 19, 2026 the Snoqualmie Planning Commission met to review the final draft documents for the Snoqualmie Comprehensive Plan and development regulation amendments. Following their review, the Planning Commission recommended approval of Scenario 5 to the Snoqualmie City Council.

AHC staff are happy to assist Snoqualmie in addressing these recommendations. For immediate resources and guidance on aligning with the CPP Housing Chapter, refer to the following:

- 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 or 206-848-0681.

Sincerely,



Claudia Balducci
Affordable Housing Committee Chair
King County Councilmember, District 6

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