

**KING COUNTY GROWTH MANAGEMENT PLANNING COUNCIL AGENDA ITEM**

<b>AGENDA TITLE:</b>	<b>Growth Target Reconciliation Process</b>
<b>PRESENTED BY:</b>	<b>Rebecca Maskin, Demographic Planner Rhonda Elder, City Manager, City of Carnation Mayor Katherine Ross, City of Snoqualmie</b>

**Today's Meeting**

Building from its previous meetings, the Growth Management Planning Council (GMPC) will review the Interjurisdictional Team's (IJT) recommendation on reconciling growth targets and housing need for the cities of Carnation and Snoqualmie to resolve jurisdictional inconsistencies between growth assumptions used in comprehensive plans and growth targets adopted in the Countywide Planning Policies. Representatives from the cities requesting reconciliation will also participate in briefing GMPC on their respective requests.

**Background**

The June GMPC [staff report](#) on growth targets reconciliation contains essential background on the policy framework for reconciliation. At its July meeting, GMPC finalized guiding principles for decision making on reconciliation and directed GMPC staff to conduct additional outreach and compel formal requests from jurisdictions seeking in reconciliation, so that each request for reconciliation could be considered on its individual merits.

In August, GMPC staff met individually with jurisdictions to discuss their requests and explain GMPC's principles for reconciliation. As a result of the outreach, two jurisdictions, Carnation and Snoqualmie, elected to pursue the process and submitted written requests for growth target reconciliation. These requests are attached to this staff report in Attachment A. <sup>1</sup>

Table 1 summarizes Carnation and Snoqualmie's respective reconciliation requests.

*Table 1: Cities Requesting Growth Target Reconciliation*

City	Adopted Housing Target	Requested Housing Target	Difference
Snoqualmie	1,500	719	-781
Carnation	799	350	-449

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<sup>1</sup> The City of Snoqualmie issued two earlier letters to GMPC, spurring consideration of a reconciliation process. The [March 2024](#) and [July 2024](#) documents are available on GMPC's website.

## **Evaluating Reconciliation Requests**

### *Requests' alignment with GMPC guiding principles*

At its June and July meetings, GMPC established guiding principles to support decision making about reconciliation. The guiding principles set procedural, countywide, and local thresholds for decision making on reconciliation requests. This section will discuss how the cities' requests align with guiding principles that create procedural and countywide thresholds for reconciliation. The following section, *Jurisdictional rationale*, will summarize Carnation and Snoqualmie's requests relative to GMPC's guiding principles 2 and 3.

### **Guiding Principle 1: Reconciliation/amendments may be pursued when significant changes to the planning framework or local circumstances that could not have been anticipated have occurred since target adoption.**

Significant changes to King County's and Washington's growth management framework have occurred since growth targets were adopted in 2021.<sup>2</sup> Legislative and policy changes are detailed in GMPC's [June 2024 staff report](#) on reconciliation and include state-level legislation (e.g., [SB 1220](#), [HB 1110](#)), reinterpretation of the meaning of growth targets in the Countywide Planning Policies, and the linking of growth targets and housing need. Local circumstances that have shifted are detailed in the cities' memos to GMPC and summarized in the section, *Jurisdictional rationale*, below.

### **Guiding Principle 4: Jurisdictions should directly request reconciliation or amendment of their target.**

While the City of Snoqualmie had already directly requested reconciliation from GMPC, the city provided additional details in a memo sent to GMPC in August 2024. The City of Carnation provided a written request for reconciliation to GMPC. Attachment A includes both cities' recent requests in response to questions developed by GMPC at their July meeting.

### **Guiding Principle 5: Amended targets must further King County's alignment with the Regional Growth Strategy and protect the integrity of the growth target setting process.**

Carnation and Snoqualmie are both Cities in the Rural Area and are included in the "Cities and Towns" Regional Geography within the VISION 2050 Regional Growth Strategy. Adopted housing growth targets for the Cities and Towns in the Countywide Planning Policies comprise 5.6 percent of King County's total housing growth. This is higher than the share of growth allocated to King County Cities and Towns in the Regional Growth Strategy (5 percent of population or approximately 4.7 percent of housing). The 1,230-unit reduction proposed through reconciliation reduces the share of housing growth in Cities and Towns to 5.2 percent of the county's total housing growth, increasing consistency with the Regional Growth Strategy. Additionally, each city's individual request is more consistent with conceptual growth target values developed to support growth target setting in the 2021 Countywide Planning Policies update. Carnation's reconciliation request of 350 units is slightly higher but consistent with its initial target value range of 176-341 units, and Snoqualmie's reconciliation request of 719 falls within its initial range of 261-2,325 units.

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<sup>2</sup> The City of Sammamish's growth target was adopted in 2022.

**Guiding Principle 6: GMPC staff will coordinate with PSRC and Commerce to minimize any risk to plan certification.**

Staff to the GMPC have briefed PSRC and Department of Commerce staff since Snoqualmie's initial request for reconciliation was received in March 2024. PSRC staff were included in outreach meetings with reconciliation cities, and Commerce staff were consulted in developing an approach to amend countywide and jurisdictional housing need.

**Guiding Principle 7: Growth targets should only be redistributed when countywide housing needs are addressed.**

Growth targets and housing need are inherently linked in the Countywide Planning Policies. GMPC staff are recommending that any amendments to growth targets made as a part of reconciliation include commensurate amendments to housing need. To preserve the integrity of the growth targets-housing need relationship, meet Commerce minimum standards for housing need allocation, and respect the Affordable Housing Committee's equity principles, GMPC staff explored adjustment methods that use the existing model to make countywide adjustments to housing need, and promote an equitable distribution of housing choices across jurisdictions and increase housing supply for low- and moderate-income households. More details are provided in the section, *Amending Housing Need*, below.

**Guiding Principle 8: Reconciliation should limit impacts to jurisdictions not requesting amended targets.**

The reconciliation requests do not directly affect or alter other jurisdictions' growth targets or housing need.

*Jurisdictional rationale*

Per GMPC's direction, each jurisdiction seeking reconciliation submitted correspondence to GMPC detailing their need for amended growth targets, satisfying GMPC guiding principle 4 and responding to guiding principle 3. These memos are included in Attachment A and points relevant to GMPC guiding principles 2 and 3 are summarized below. First, guiding principles 2 and 3 state:

*Guiding Principle 2: Reconciliation/amendments may be allowed where adherence to the adopted targets creates a conflict with other GMA goals (e.g., environmental issues, infrastructure to serve growth); and*

*Guiding Principle 3: Jurisdictions are responsible for demonstrating need, consistent with the threshold and principles for reconciliation, for the requested target change.*

Carnation

Carnation is a City in the Rural Area with approximately 800 housing units; its adopted growth target of 799 units would effectively double the size of the city in 20 years. Growth at this scale would place pressure on the city's ability to effectively provide public facilities and services given its limited wastewater and transportation infrastructure. Limited transportation routes are an emergency management concern given the city's risk for flooding at the confluence of the Tolt and Snoqualmie Rivers and downstream from Seattle Public Utilities' (SPU) Tolt Dam. The city has been working with a coalition of organizations and agencies to address transportation issues and is engaged with SPU on emergency management and evacuation. Carnation has

recently increased diversity in its housing stock, making zoning changes that require a mix of housing types (townhomes, cottages, duplexes, single detached units, and multifamily) in traditionally single-family zones, adding new apartment units, and the city's first income-restricted housing development is nearing completion.

### Snoqualmie

Snoqualmie is a City in the Rural Area with approximately 4,900 housing units divided between a historic downtown along the Snoqualmie River and two recently built out planned communities of densely packed detached homes along Snoqualmie Ridge. Because of the buildout of the Snoqualmie Ridge planned communities, Snoqualmie has already achieved its previous 2035 housing growth target. The city is challenged by limited water rights to effectively serve growth at the level of the adopted targets beyond 2030, and environmental concerns with development in the floodway in its traditional downtown and unincorporated UGA. The city states that its development capacity has diminished since the growth targets were set from tribal acquisitions in the city and unincorporated UGA. Snoqualmie has two income restricted housing developments and notes that it is planning for affordable supply in its limited development capacity, noting its limited capacity for new market rate development.

### **Amending Housing Need**

In the Countywide Planning Policies, the sum of a jurisdiction's total housing need is equal to the jurisdiction's housing growth target, explicitly relating jurisdictional growth targets and housing need. Further, Countywide Planning Policy DP-13(a) states that "The Growth Management Planning Council shall... update housing and employment growth targets and housing needs periodically," and policy DP-12(a) states that housing growth shall be allocated to each city and urban unincorporated area, "informed by the 20-year projection of housing units from the state Department of Commerce." Collectively, these policies suggest that countywide and jurisdictional housing need should be amended should changes in growth targets occur. The distribution of housing need to King County jurisdictions is further guided by the Department of Commerce's minimum standards for allocating projected housing needs, which state that "the sum of all housing needs allocated to local jurisdictions in a county must be no less than the total projected countywide need,"<sup>3</sup> and the Affordable Housing Committee's equity principles for housing need allocation.<sup>4</sup>

Implementing growth target reconciliation necessitates amending housing need commensurate with growth targets changes, while being careful to maintain consistency with the other standards that shape the housing need allocation.

To do this, GMPC staff have developed a three-step method to adjust housing need that maintains this consistency, while limiting changes in housing need to the jurisdictions requesting reconciliation. The steps are:

1. Reduce countywide housing need by 1,230 units, commensurate to growth target reductions, and reallocate across income bands via Commerce's Housing for All Planning Tool (HAPT).

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<sup>3</sup> Washington Department of Commerce, Establishing Housing Need Targets for Your Community, 2023. [\[LINK\]](#)

<sup>4</sup> King County Affordable Housing Committee, Jurisdictional Housing Needs Staff Report, 2022 [\[LINK\]](#)

2. Apportion countywide need changes to Carnation and Snoqualmie proportionate to the cities' revised growth targets.
3. Adjust the need distributions across income bands consistent with the Affordable Housing Committee's equity principles for allocation, so that housing need by income level sums to no less than projected countywide need.

Emergency housing needs are also adjusted to reflect the revised growth targets. Emergency housing needs are allocated to jurisdictions by proportionate to their housing growth target, making this adjustment simpler to execute.

Because of the scale of housing need for low- and moderate-income levels inherent in the HAPT model, most of the reduced countywide housing need is in the 80 percent and higher AMI categories. As a result, Carnation and Snoqualmie's revised housing need is concentrated in the 0-80 percent AMI brackets. Additionally, housing need in both cities is marginally higher than either city's growth target, as neither city had sufficient moderate and market rate housing need to reduce to accommodate changes in housing need. Carnation's housing need is three units greater than its growth target, and Snoqualmie's housing need is 32 units greater than its growth target. While this outcome is inconsistent with the principle that housing need totals to the growth target for each jurisdiction, the method preserves other key principles upholding the relationship between housing need and growth targets, with limited impact to all jurisdictions.

### **Draft IJT Recommendation**

The Interjurisdictional Staff Team recommends that GMPC implement the reconciliation process by amending growth targets and housing need in Countywide Planning Policies Tables DP-1 and H-1 respectively. Specifically, Table DP-1 should be amended to:

- Reduce countywide growth by 1,230 housing units,
- Revise the housing growth target for the city of Carnation to 350 housing units, and
- Revise the housing growth target for the city of Snoqualmie to 719 housing units.

Table H-1 should be amended to:

- Reduce countywide housing need by 1,230 housing units and recalculate countywide housing need through Commerce's Housing for All Planning Tool (HAPT), and
- Reallocate changes in housing need across income bands, including emergency housing need, to Carnation and Snoqualmie consistent with their revised growth targets, and in a manner that meets Commerce's minimum guidance and is consistent with the Affordable Housing Committee's equity principles.

Revised versions of tables DP-1 and H-1 will be furnished if GMPC takes action on IJT's recommendation.

### **Future Activity**

With GMPC concurrence, a draft motion advancing the IJT recommendation will be brought to GMPC for action at GMPC's October meeting. If GMPC needs more time for position development, GMPC will present a potentially revised recommendation at its October meeting,

with action possibly extending in to 2025. If GMPC chooses to not accept these requests for reconciliation, GMPC staff will communicate this decision to the requesting cities and no further action on reconciliation will be taken.

### **For More Information**

Please contact Rebekkah Maskin, Demographic Planner, at [rmaskin@kingcounty.gov](mailto:rmaskin@kingcounty.gov) or 206-263-0380.

### **Attachment**

A. Reconciliation Request Memos from Carnation and Snoqualmie