

KING COUNTY GROWTH MANAGEMENT PLANNING COUNCIL AGENDA ITEM

AGENDA TITLE:	Growth Target Reconciliation Process
PRESENTED BY:	Rebecca Maskin, Demographic Planner

Today’s Meeting

Building from its previous meetings, the Growth Management Planning Council (GMPC) will hear feedback received from the Interjurisdictional Team and the Affordable Housing Committee on reconciliation and review additional options for reconciling growth targets and housing need for the cities of Carnation and Snoqualmie to resolve jurisdictional inconsistencies between comprehensive plan growth assumptions and growth targets adopted in the Countywide Planning Policies.

Background

The June GMPC [staff report](#) on growth targets reconciliation contains background on the policy framework for reconciliation. The September [staff report](#) includes a detailed evaluation of how reconciliation requests meet GMPC’s guiding principles for reconciliation. Reconciliation is a process to amend growth targets. Two cities, Carnation and Snoqualmie have requested reconciled growth targets. Table 1 summarizes Carnation and Snoqualmie’s respective reconciliation requests. Collectively, the two requests seek a reduction of 1,230 housing units, which is 0.4 percent of King County’s targeted countywide growth of approximately 309,000 housing units between 2019-2044.

Table 1: Cities Requesting Growth Target Reconciliation

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

At its September meeting, GMPC reviewed IJT’s initial recommendation on reconciling adopted growth targets with Carnation and Snoqualmie’s requests. There was not a consensus response to the recommendation. Some GMPC members supported the recommended action to reconcile and sought to prevent the potential action from setting precedent and spurring future requests. Other GMPC members expressed concern about an action that would reduce the overall amount of housing being planned for under the growth targets and related housing need. Other members sought additional understanding of the jurisdictions’ unique and unanticipated needs for reconciliation relative to GMPC’s guiding principles for reconciliation. GMPC staff agreed to provide GMPC with expanded options for reconciliation at their December meeting.

Affordable Housing Committee Feedback

After GMPC’s September meeting, GMPC staff presented on reconciliation to the Housing Interjurisdictional Team and Affordable Housing Committee (AHC). AHC members expressed concern about reconciliation setting negative precedent in undermining the commitment to plan for growth represented by growth targets and housing need, and similarly wanted to understand the unique circumstances in jurisdictions that supported reconciliation. AHC members observed that the requested growth targets were significantly less than their adopted amounts, and that cities should add density to counteract decreases in developable land supply or find other jurisdictions to take their excess growth target and housing need.

Expanded Reconciliation Options

IJT has identified three general paths for GMPC to act on reconciliation. In summary, GMPC may choose to deny the current requests for reconciliation, accept the requests and reduce countywide growth commensurately to the requests, or accept the requests but seek no-net-loss of countywide growth. Table 2 presents and describes each of these general options and explores the trade-offs of each method.

Table 2: Reconciliation Options

		Reject Requests	Accept Requests	
			Adjust Countywide Growth	No-net-loss of Countywide Growth
Description		Reject current reconciliation requests	Amend targets as requested, amend housing need to match	Amend targets as requested, but find an offset to target reductions, amend housing need to match
Amend	Countywide Growth?	No	Yes	No
	Growth Targets?	No	Yes	Yes
	Housing Need?	No	Yes	Yes
Strengths		Sets a strong precedent on target setting.	Allows for changed circumstances since target setting. Changes only affect reconciliation cities. Housing need adjustments meet AHC equity principles and Commerce minimum standards.	Sets a strong precedent on target setting. Commits to the existing amount of housing growth. Housing Need adjustment method potentially simpler.
Cautions		Plan review risk for cities requesting reconciliation.	Need to avoid setting negative precedents. Small differences between housing need and growth targets in reconciliation cities.	Affects jurisdictions not seeking reconciliation. Need to find a willing partner to take growth and adjusted housing need.

If GMPC accepts the reconciliation requests, the key difference between options is whether the countywide growth total is amended. GMPC selected the countywide housing growth allocation

with the adoption of growth targets in the Countywide Planning Policies in 2021. The amount is based on the population projection supporting VISION 2050. The countywide amount reflects King County's population growth under the Regional Growth Strategy converted to housing, plus an additional 8,500 housing units voluntarily added by cities during growth targets allocation. This means that even were the reduction to be made the countywide total, it would still be higher than the amount called for in the Regional Growth Strategy.

Should GMPC prefer a reconciliation option that seeks a no-net-loss of countywide growth, a recipient of the excess growth target and associated housing need should also be identified. In considering a no-net-loss option, GMPC should also consider whether recipients of excess growth are preferred to be from the same King County subarea as the reconciliation cities, and how exchanged growth targets relate to the VISION 2050 Regional Growth Strategy. For example, growth target exchanged between cities in the Cities and Towns Regional Geography would have a neutral effect on consistency with the Regional Growth Strategy, while growth target that is transferred to a more intensive Regional Geography (Metro Cities, Core Cities, or High Capacity Transit Communities) would further King County's compliance with the Regional Growth Strategy.

IJT Feedback on Expanded Reconciliation Options

IJT discussed these expanded reconciliation options at its October and November meetings. IJT members did not develop a new consensus recommendation for GMPC action, though members were supportive of the requests for reconciliation. Members agreed that the changes to the planning framework brought on by the 2021 Countywide Policies and statewide legislation passed since the targets were adopted were significant and created circumstances that warranted flexibility, especially with the introduction of a new accountability framework for housing growth. IJT identified the tension between an expedient solution to reconciliation requests and meeting all of the planning principles expressed by GMPC. For example, pursuing a strategy with no-net-loss of countywide growth would be difficult without willing recipients for reconciled growth target.

If GMPC seeks to reconcile growth targets, IJT members expressed that, given the timing near to the periodic update deadline and complexity of changing growth assumptions, a simple solution should be sought and paired with a longer-term approach to avoid precedent setting, documented in a motion. For example, GMPC could opt to reduce growth targets for requesting cities in the short term and commit to longer term measures in the motion that codify findings regarding future target setting or reconciliation processes, or that offset the countywide growth change after plans adopted.

IJT expressed that cities interested in reconciliation should be primarily responsible for finding partners for excess growth, with GMPC staff assistance to guide countywide growth topics like adjusting housing need. IJT discussed establishing a deadline for potential growth target exchanges to create a timeline for GMPC action in the first half of 2025 if it is desired.

Seeking GMPC Feedback

At the December meeting, IJT is seeking GMPC's feedback to shape action on reconciliation, including on the questions:

- Does GMPC agree to using the motion to document the reconciliation process and avoid setting precedent as a means of avoiding negative precedent?
- Does GMPC agree that that cities requesting reconciliation should lead on finding solutions to offset changes in countywide growth?
- Does GMPC have a preference on the timing of its decision making, e.g., creating a deadline for staff-level action and presenting a draft motion in March 2025 with GMPC action in June 2025, or creating an expedited pathway for direction on accepting or denying requests?
- Are circumstances present that would support amending countywide growth, or maintaining the current amount?

Future Activity

GMPC's preferences on action to resolve current reconciliation requests shared at its December meeting will shape future activity for this topic. 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. If GMPC seeks to accept requests for reconciliation, depending on the preferred approach, IJT could present a draft motion at its first meeting of 2025 for potential action then, or at the second GMPC meeting of 2025.

For More Information

Please contact Rebekkah Maskin, Demographic Planner, at rmaskin@kingcounty.gov or 206-263-0380.

Attachment

A. Additional Information on Reconciliation Requests from Carnation, and Snoqualmie Request Letters



CITY OF CARNATION

HOUSING TARGET RECONCILIATION REQUEST *2024*

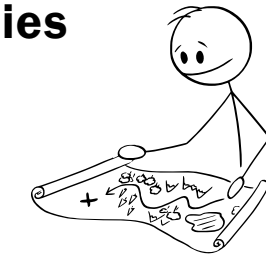
WHAT UNANTICIPATED LOCAL CIRCUMSTANCES HAVE SHIFTED SINCE THE TARGETS WERE ADOPTED?

Administrative Error

Prior City staff incorrectly based the housing target on the maximum capacity of the sewer system, not on a 20-year growth plan. **King County staff projected the housing target for Carnation to be between 176-341 with a baseline of 273.** Not understanding the process, prior Staff (without City Council knowledge) projected 799. **See King County’s spreadsheet below.**

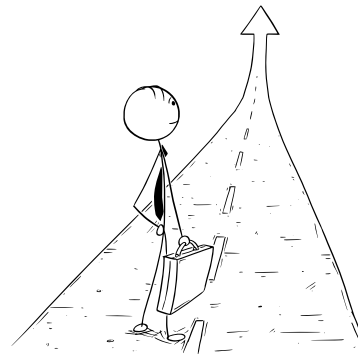
Inconsistency with Countywide Planning Policies

“Goal Statement: A transportation system that is well-designed and managed to protect public investments, promote equitable access, provide mobility, promote public health and safety, and achieve optimum efficiency.”



No Public Transportation

- There is **no Metro service** in Carnation.
- There is no connection to high-capacity transit.
- No ability to get residents to jobs, medical care or services outside of the Snoqualmie Valley.
- Habitat for Humanity canceled a project in Carnation due in large part to no public transportation.



Safety

- The City of Carnation **declared a state of emergency** on August 30, 2023, due to the Tolt Dam Early Warning System’s repeated false alarms and system unreliability creating a safety and public health emergency.
- Following another alarm incident in March 2024, the **Tolt Dam Early Warning System** was **deactivated**. It remains off.
- SPU has commissioned a **third-party assessment** of the Tolt Dam Early Warning System.
- There is only one road in and one road out of Carnation making evacuation of 2,250 residents, 1,400 school children and teachers and visitors impossible without critical infrastructure improvements.

Preliminary Targets based on proportion of:								Target Baselines*	
Housing				Jobs					
HU Target	HU 2006-18	HU Capacity	2019 Jobs	Jobs 2019	Jobs Target	Jobs 2012-18	Job Capacity	Housing Target	Jobs Target
303	176	341	271	251	434	204	653	273	385



NATIONAL
False Tolt Dam Failure Alert Triggers Evacuation in Washington



WEATHER
Washington dam failure alert system activated by mistake, sends people 'running' for higher ground
The Tolt Reservoir and Dam are located 16 miles upstream from Carnation, Washington
By Travis Fedtschun · Fox News



Carnation evacuated by another false alarm from Tolt River Dam
By FOX 13 News Staff | Updated March 28, 2024 6:50pm PDT | Carnation | FOX 13 Seattle |

LOCAL
Tolt Dam alarm fails again

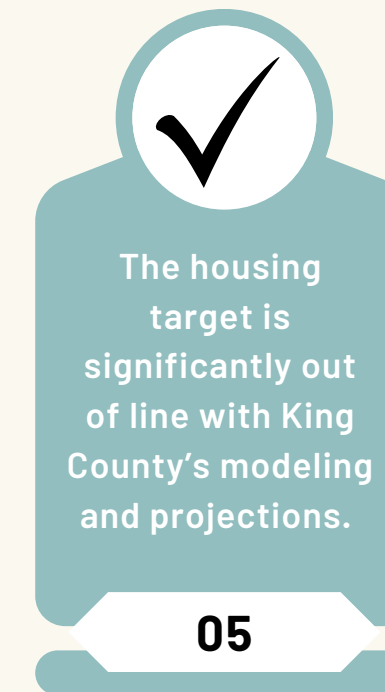
2 more false Tolt Dam breach alarms cause 'panic' in Carnation Wednesday

'People were so traumatized'; Carnation city leaders demand action on Seattle's Tolt Dam
By Nikki Torres | Published October 5, 2023 6:26pm PDT | Carnation | FOX 13 Seattle |



WHAT PREVENTS OTHER CITIES FROM REQUESTING RECONCILIATION?

A city would need to demonstrate the following:

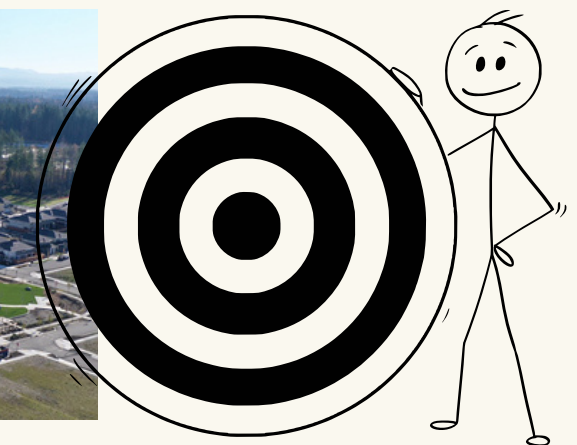


WHAT WILL HAPPEN TO THE 449 HOUSING UNITS ELIMINATED FROM CARNATION?

- Black Diamond is willing to take the upper income band housing units in their current comprehensive plan.
- Both Carnation and Black Diamond are in King County and both in the **same regional geography** (Cities and Towns) according to Vision 2050 making it a good fit.
- Another alternative is Sammamish who has capacity and may be willing to incorporate the numbers into their comprehensive plan amendment in 2025.



Black Diamond, WA





HOW THE CITY OF CARNATION EMBRACES HOUSING BY INCOME BAND:

1

15-unit affordable senior housing community is nearing completion in Carnation!

2

Carnation's R12 zoning requires a mixture of three different housing types and no single housing type may occupy more than 60% of the total dwelling units.

3

Cottage housing is permitted in all residential zones AND cottages are exempt from minimum lot area.

4

Exemptions of school, transportation and park impact fees for low-income housing development.

5

Waiver of school impact fees for ADUs.

6

Transportation and park impact fees significantly reduced for ADUs.

7

Residential density incentives for affordable housing in all single-family zones.

8

Permanent supportive housing is allowed in R12 and R24 residential zones, as well as the Commercial Business District and Mixed-Use zones.

Attachment A: Additional Information on Reconciliation Requests



Office of the Mayor

Katherine Ross

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Snoqualmie, Washington 98065
(425) 888-5307 | KRoss@Snoqualmiewa.gov

March 7, 2024

SENT VIA EMAIL

Dow Constantine, King County Executive
King County Chinook Building
401 5th Ave #800
Seattle, WA 98104

RE: City of Snoqualmie Request for Reconciliation of 2044 Housing Target

Dear Executive Constantine,

The Snoqualmie City Council recently passed Resolution No. 1680, declaring a revised 2044 growth target for housing and requesting a King County reconciliation of the established target pursuant to King County Countywide Planning Policy D-13, as amended in 2021 which allows GMPC to create a coordinated process to reconcile growth targets. A copy of the signed resolution is included for your reference. Please note, no reconciliation of the assigned employment target of 4,425 is requested.

Over the past two years the City analyzed and considered a variety of methods to accommodate its 1500-unit housing target. On [January 19, 2023](#), the City petitioned King County for an amendment to the CPP's to include provisions of the Urban Growth Boundary Revisions (ESSB 5593) that would allow for the expansion of the UGA through the Four to One Program and the subsequent annexation of that land to allow the City to accommodate its adopted growth targets. This petition was rejected. In addition, the City reviewed rezoning, increasing height, annexation and adopting regulations to allow multi-family tax exemptions (MFTE) and increasing the number of accessory dwelling units, ADU's; of which the latter two were successfully completed. Over the past 18 months the City completed many [studies](#) including a Snoqualmie Valley Regional Housing Needs Analysis, Citywide Housing Needs Assessment, Middle Housing Analysis, Housing Strategy Plan, and Buildable Lands Capacity.

A Snoqualmie Growth Targets Analysis and Snoqualmie Land Capacity Analysis Memo completed in February 2024 by LDC, Inc. summarizes the City's total housing capacity available at 719 units. Most land in the City is either built-out or undevelopable due to the presence of environmentally sensitive areas, including the floodplain. The analysis found that approximately 49% of land in the City is impacted by local regulations governing and protecting environmentally sensitive areas and 21% of land is in the floodway. Additionally, 86% of single-

Attachment A: Additional Information on Reconciliation Requests

family lots are unlikely to see future development, including Accessory Dwelling Units (ADUs), given regulations against such development set forth in their Covenants, Conditions, and Restrictions (CC&Rs).

A considerable amount of the developable land in the Urban Growth Area is owned by the Snoqualmie Tribe, which has the stated goal of preserving these lands for cultural reasons. Therefore, these lands were excluded from the capacity analysis to respect the tribal cultural significance of the land. Furthermore, the Snoqualmie Tribe's purchase of Salish Lodge and surrounding parcels in 2019 resulted in the cancellation of the Salish Lodge expansion, a City Council approved project intending to provide up to 150 homes and hundreds of new jobs.

Lastly, it's important to note that the City currently does not have an approved Water System Plan (Comprehensive Plan) pursuant to RCW 70.116.050. During their review in 2021, King County identified that the City did not have sufficient water available to serve the 2044 projected housing growth target of 1,500 units. The plan has yet to be approved as it still under separate review.

The results of this work, in consultation with King County, Department of Commerce, Puget Sound Regional Council, and Snoqualmie City Council, helped the City determine that reconciliation, specifically amending Table DP-1: King County Jurisdiction Growth Targets 2019-2044, would be the best path forward toward Growth Management and Comprehensive Plan compliance.

As a next step, City staff will work with King County staff and the King County Growth Management Planning Council (GMPC) to process this request.

If you have questions or would like to discuss the contents of this letter, including any technical reports or studies, please feel free to contact me.

I appreciate your time and attention to this matter.

Sincerely,



Katherine Ross
Mayor, City of Snoqualmie

Enclosures: City of Snoqualmie Resolution 1680

CC: Growth Management Planning Council
Sound Cities Association Brian Parry, Policy Director and David Hoffman, Executive Director
Ivan Miller, Principal Planner, KC Executive Department Performance, Strategy, and Budget

Attachment A: Additional Information on Reconciliation Requests

RESOLUTION NO. 1680

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF SNOQUALMIE, WASHINGTON, DECLARING A REVISED 2044 GROWTH TARGET FOR HOUSING AND REQUESTING A KING COUNTY RECONCILIATION OF THE ESTABLISHED TARGET.

WHEREAS, the City exceeded its assigned 2035 King County growth target for housing by achieving growth of 1,873 units by the year 2018 with development of Snoqualmie Ridge I and II; and

WHEREAS, the City was assigned a 2044 King County growth target for housing of 1,500 units in December of 2021; and

WHEREAS, the City met with the King County Growth Management Planning Council (GMPC) on options for new land capacity, including potential use of provisions of Engrossed Substitute Senate Bill 5593 that allow, under certain circumstances, an equal exchange of land inside and outside of the urban growth area, and through use of the County’s Four-to-One Program; and

WHEREAS, the City conducted various land use and housing studies and reports to inform a desired growth target for housing, including a Snoqualmie Valley-wide housing needs analysis, a Citywide Housing Needs Analysis, a Middle Housing Analysis including a land capacity analysis (buildable lands), and a Housing Strategy Plan (collectively referred to hereafter as the “Land Use and Housing Studies”); and

WHEREAS, the Land Use and Housing Studies demonstrate that the assigned growth target of 1,500 housing units is not feasible, and that only 719 housing units can feasibly be developed within the City of Snoqualmie’s current urban growth boundary; and

Attachment A: Additional Information on Reconciliation Requests

WHEREAS, the City Council met in June 2023 and discussed necessary steps forward to identify a new desired housing growth target to replace the infeasible target of 1,500 unit established by the Countywide Planning Policies; and

WHEREAS, based on the analysis shown in the City’s Land Use and Housing Studies, the City Council of the City of Snoqualmie desires to amend the King County 2044 growth target for housing, as previously adopted by King County in Countywide Planning Policy DP-14 and Table DP-1: King County Jurisdiction Growth Targets 2019-2044;

NOW, THEREFORE, BE IT RESOLVED, by the City Council of the City of Snoqualmie, Washington, as follows:

Section 1. The City of Snoqualmie desired growth target for 2044 is 719 units.

Section 2. The aforementioned Land Use and Housing Studies and other analyses of housing and current land capacity demonstrate the 1,500 units of new housing established by the King County Jurisdiction Growth Targets 2019-2044 are not feasible, and that the King County growth target for the City of Snoqualmie should be adjusted to match the City’s housing desired growth target of 719 new units.

Section 3. The City of Snoqualmie requests to reconcile the 2044 housing target in accordance with Countywide Planning Policy, D-13 (C).

PASSED by the City Council of the City of Snoqualmie, Washington, this 12th day of February 2024.



Katherine Ross, Mayor

Attachment A: Additional Information on Reconciliation Requests

Attest:

Deana Dean

Deana Dean, City Clerk

Approved as to form:

David A. Linehan

David A. Linehan (Feb 15, 2024 03:32 PST)

David Linehan, Interim City Attorney

Attachment A: Additional Information on Reconciliation Requests



Office of the Mayor

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July 16, 2024

Dow Constantine
King County Executive
401 5th Ave #800
Seattle, WA 98104

SENT VIA EMAIL

RE: City of Snoqualmie Request for Reconciliation of 2044 Housing Target

Dear Executive Constantine,

On [March 7, 2024](#), the City of Snoqualmie formally requested that King County Growth Management Planning Council (GMPC) proceed forward with the establishment of a reconciliation process and King County docket request to amend the King County Countywide Planning Policy D-14, Table DP-1 to housing growth target 719. This letter serves to elaborate on why Snoqualmie cannot meet the housing growth target of 1500 units.

The City of Snoqualmie did not ratify the King County housing growth targets due to the land use constraints identified during the Comprehensive Plan update. Based on the studies, the Snoqualmie City Council passed [Resolution No. 1680](#) declaring a revised 2044 housing growth target of 719.

The Interjurisdictional Team (IJT) recommended draft guiding principles to support decision making about reconciliation. Such a process may be pursued when significant changes to the planning framework or local circumstances have occurred since target adoption. In Snoqualmie there is insufficient source of water to serve growth. Just this year it was determined that the City Water System Plan (WSP) cannot be reconciled with the City's 2044 Growth Target due to insufficient water availability. The WSP was reviewed by the King County Utilities Technical Review Committee (UTRC). The UTRC determined no recommendation to the King County Council would occur without a revised 2044 growth target because the water available under the WSP is incapable of serving the total units identified in the adopted growth target.

The City conducted numerous land use and housing [studies](#) including a Snoqualmie Valley Regional Housing Needs Analysis, Citywide Housing Needs Assessment, Middle Housing Analysis, Housing Strategy Plan, and Buildable Lands Capacity. These studies were performed

Attachment A: Additional Information on Reconciliation Requests

as part of the comprehensive plan update and were completed after receiving the King County housing growth target. The reports conclude that there is insufficient land to accommodate a housing target of 1,500.

- **Floodplain and Presence of Critical Areas:** The City's analysis found that approximately 49% of land in the City is impacted by local regulations governing and protecting environmentally sensitive areas, and 21% of land is in the floodway.
- **Urban Growth Area (UGA):** A considerable amount of the developable land in the UGA has been purchased by the Snoqualmie Tribe, which has stated their goal of preserving these lands for cultural reasons. Most of the remaining acres are associated with steep slopes, landslide, wetlands, and streams. Approximately 14% of the UGA is buildable and a portion is designated for commercial use.
- **Presence of Homeowners Association and Mixed-Use Plan Permitted Communities:** The City's master planned communities of Snoqualmie Ridge (SR) I and II consist of nearly half of the City's geographic area. Approximately 86% of single-family lots within the City are in SR I and II. These completed master plan communities are permitted under Mixed-Use Final Plan Permits and are unlikely to see changes to the conditions of approval regulating these permits. The Homeowners Association regulates such additional units like Accessory Dwelling Units (ADUs), as set forth in the Association's Covenants, Conditions, and Restrictions (CC&Rs).
- **Inability to Adjust UGA Boundary:** The [City petitioned King County](#) for an amendment to the CPP's to include provisions of the Urban Growth Boundary Revisions (ESSB 5593) as well as revisions that would allow for the expansion of the UGA through the Four-to-One Program and the subsequent annexation of that land to potentially achieve the housing growth target. This petition was rejected.

In addition to land deficiency, there are other unique circumstances prohibiting expansion in the City, these include:

- **Snoqualmie Tribe's purchase of Salish Lodge:** The Snoqualmie Tribe's purchase of Salish Lodge and surrounding parcels resulted in the cancellation of the Salish Lodge expansion, a City Council-approved project intending to provide up to 150 homes and hundreds of new jobs.
- **Snoqualmie Valley Mayors' concerns:** The Snoqualmie Valley Mayors of Carnation, Duvall, North Bend and Snoqualmie sent a letter to Department of Commerce on [November 10, 2022](#), sharing concerns regarding affordable projected housing needs and housing growth targets concerns:
 - a. Transportation – need investment in road infrastructure and transit services.
 - b. Land/urban services – geographical and natural constraints; limited water and sewer infrastructure to support development projected needs.

Attachment A: Additional Information on Reconciliation Requests

- c. Local needs – need local wrap around services.
- **Exceeded Previous Growth Target.** By 2018, the City met and exceeded its 2035 housing target of 1,873 units, with an estimated 2,087 units completed at final build-out of SR II. Snoqualmie was one of six cities out of a total of 39 cities to achieve their target.

The Interjurisdictional Team (IJT) recommended that guiding principles should limit reconciliation to only jurisdictions requesting amended targets. Therefore, the City is requesting the GMPC to authorize a reconciliation process by permitting Black Diamond, which has indicated interest in increasing its growth target, to absorb the 781 units that Snoqualmie is requesting to release.

Following this, the City asks the GMPC to recommend to the King County Council that they amend Table DP-14 by the conclusion of 2024 to reflect the redistribution of units among jurisdictions.

If you have questions or would like to discuss the contents of this letter, including any technical reports or studies, please feel free to contact me.

I appreciate your time and attention to this matter.

Best regards,



Katherine Ross
Mayor

CC:

GMPC

Sound Cities Association, Policy Director and David Hoffman, Executive Director

Ivan Miller, Principal Planner, KC Executive Department Performance, Strategy, and Budget

Carol Benson, Mayor of Black Diamond



Office of the Mayor

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MEMORANDUM

Date: August 26, 2024

To: Ivan Miller, King County GMPC
Rebecca Maskin, King County Demographic Planner
Liz Underwood-Bultmann, PSRC Principal Planner

From: Mayor Katherine Ross *KR*

RE: Snoqualmie Growth Target Reconciliation

Thank you for meeting with us recently to discuss the City’s Growth Target Reconciliation request. This memo aims to address the questions you provided, which will be reviewed at the upcoming GMPC meeting.

The City of Snoqualmie is requesting King County reconciliation of the 2044 housing growth target and projected affordable housing needs. The housing growth target was not based upon the capacity identified in the 2021 Urban Growth Capacity Report (UGCR) or any other capacity analysis.

City Intention and Vision:

1. What changes is the city seeking, numerically for the target and intent?

The City’s most recent [Land Capacity Analysis](#) (LCA) Appendix A, completed February 1, 2024 demonstrates the City has capacity for an additional 719 residential units by 2044. The City is requesting its existing housing growth target of 1,500 residential units be amended to 719 residential units with specific adjustments to affordable housing needs and to the Emergency Housing target.

The City fully intends to comply with the revised housing target and associated projected affordable housing need.

2. What is the justification or rationale for the change sought?

There are several justifications and rationale for seeking this change. As part of the comprehensive planning process, the City completed [studies](#) (Appendices A – E) including Snoqualmie Valley Regional Housing Needs Analysis, Snoqualmie Housing Needs Assessment, Middle Housing Analysis, Housing Strategy Plan, and Land Capacity which justify the City’s rationale by demonstrating insufficient urban services, significant

Attachment A: Additional Information on Reconciliation Requests

environmental constraints, restrictions on development within the floodplain, and completion of existing master planned communities.

The Snoqualmie [LCA](#) indicates that most land in the City is either built-out or consists of environmentally sensitive areas. The analysis found that approximately 49% of land in the City is impacted by local regulations governing and protecting these environmentally sensitive areas including the floodway. The floodplain impacts an additional 935 acres (21%) of the City.

Additionally, 86% of existing single-family lots are unlikely to see future development, including Accessory Dwelling Units (ADUs), given the fact that these existing lots are within fully built master planned communities of Snoqualmie Ridge I and II and subject to regulations set forth in their Covenants, Conditions, and Restrictions (CC&Rs).

A considerable amount of the developable land in the City's potential annexation area (PAA) has been acquired by the Snoqualmie Tribe, who are in the process of moving these lands into reservation status.

The City currently does not have an approved Water System Plan pursuant to RCW 70.116.050. During its review in 2021, King County identified that the city did not have sufficient water available to serve the 2044 projected housing growth target of 1,500 units; the plan has not been approved and is still under separate review.

3. What alternatives or mitigation have been considered to accommodate the adopted target and avoid reconciliation?

- **Annexation:** In 2017, the Snoqualmie Heights Partners proposed the Snoqualmie Hills West project in the PAA. The annexation failed due to various reasons including environmental constraints, the increasing amount of tribal lands added to the area, and lack of potable water and sewer capacity.
- **Rejected UGA Boundary Adjustment:** The [City petitioned King County](#) for an amendment to the Countywide Planning Policies (CPP) to include provisions of the Urban Growth Boundary Revisions (ESSB 5593) as well as revisions to the Four-to-One Program that would have allowed for subsequent annexation and exchanges of land to potentially address the City housing growth target. These petitions were rejected.
- **Previous Growth Target Success:** By 2018, the City met and exceeded its 2035 housing target of 1,873 units, with an estimated 2,087 units completed at final build-out of SR II. Snoqualmie was one of six cities out of a total of 39 cities to achieve their target.
- **City Requests to State and County:**
 - a. In order to help achieve the housing growth target, the City requested amendments to the CPPs to allow for adjacent properties to be added to the UGA, see [letters dated October 11, 2022, and January 19, 2023.](#)

Attachment A: Additional Information on Reconciliation Requests

- b. The Snoqualmie Valley Cities identified the projected affordable housing needs as a concern in the [November 10, 2022, Snoqualmie Valley Mayor's letter](#) sent to the Washington State Department of Commerce, citing concerns regarding transportation, land/urban services, and the need for local wrap around services.
- c. The Snoqualmie City Council passed [Resolution No. 1680](#) declaring a revised 2044 housing growth target of 719. On [March 7, 2024](#), and [July 16, 2024](#), the City sent letters requesting reconciliation of the housing growth target, including requesting GMPC to authorize a reconciliation process by permitting the City of Black Diamond, which has indicated interest in increasing its growth target, to absorb the excess 781 units that Snoqualmie is requesting to release.

4. What unanticipated local circumstances have shifted since the targets were adopted?

Several circumstances have shifted since King County adopted the growth targets. The City began to fully understand shifted circumstances and the related impact with completion of numerous studies, including a Water System Plan, Snoqualmie Valley Regional Housing Needs Analysis, Citywide Housing Needs Assessment, Middle Housing Analysis, Housing Strategy Plan, and a Buildable Lands Capacity.

These studies were performed as part of the comprehensive plan update and were completed after receiving the King County housing growth target. The reports conclude that there is insufficient land to accommodate a housing target of 1,500. The specific circumstances include the following:

- **Water Rights.** The results of the future water rights evaluation indicate insufficient instantaneous water rights to meet growth target demands through the year 2040. The King County Utilities Technical Review Committee (UTRC) determined no recommendation to the King County Council would occur without a revised 2044 growth target because the water available under the [Water System Plan](#) (WSP) is incapable of serving the total units identified in the housing growth target.
- **The sale of Salish Lodge & Spa.** The Snoqualmie Tribe's purchase of Salish Lodge & Spa and surrounding parcels resulted in the cancellation of the Salish Lodge expansion, a City Council-approved project intending to provide up to 150 homes and hundreds of new jobs.
- **Insufficient Buildable PAA Acres:** Land within the City's Potential Annexation Area (PAA) shows that out of the approximate 874 acres, the current buildable land acres equate to approximately 98 acres¹. The unbuildable acres include a widespread presence of critical areas and a significant amount of acreage owned

¹ Removed present use designation of single family with home values < land values, mobile homes, public/utility, and tribal lands, critical areas, and buffers including steep slope/buffers 50', landslide hazard/buffers 50', wetland/buffers 225' and streams/buffer of 100'.

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by the Snoqualmie Tribe, who are in the process of designating these lands as part of their reservation.

Furthermore, a portion of the developable acreage is designated as Master Planned Business Park for the expansion of the City's existing Snoqualmie Business Park.

- **Completed Master Plan Communities:** By 2022, the City received its last residential 46-units Timber Trails subdivision development, signifying the end of development for the two master planned communities, Snoqualmie Ridges I and II. These communities had been the City's long-term source of residential development for over twenty years and allowed the City to consistently meet and exceed its growth targets.

5. How does this request align with the Regional Growth Strategy?

The City's request aligns with the Regional Growth Strategy which "...assumes 65% of the region's population growth and 75% of the region's job growth will be located in regional growth centers and near high-capacity transit" (Vision 2050). The City of Snoqualmie is not a growth center nor is it near high-capacity transit.

The Strategy assumes that "key factors used in setting the UGA size include population and employment projections, growth targets, and land capacity. Population and employment projections are predictions about likely future growth based on past trends. Growth targets are a city policy statement on the quantity of net new housing units and jobs it plans to accommodate over the 20-year planning period based on projections and the city's role with the regional growth strategy. Land capacity is derived from an estimate of vacant land plus the redevelopment potential of land already partially developed or underutilized. Discount factors are applied to the estimate of land capacity to account for probable constraints and likelihood of developing the land over the 20-year planning period." (King County Comprehensive Plan, Appendix D.)

The City of Snoqualmie provided, through its LCA and additional studies, an updated policy statement regarding the quantity of new housing it plans to accommodate over the 20-year horizon. For the justifications described and further explained in City responses to questions 1, 2, 3, 4 and 6, the City request does align with Regional Growth Strategy.

6. What are the perspectives of utility and service providers on this request?

The City currently does not have an approved Water System Plan pursuant to RCW 70.116.050. King County reviewed the draft plan for concurrence in 2021 and identified that the City did not have sufficient water available to serve the 2044 projected housing growth target of 1,500 units.

The Water System Plan assumes that the city currently provides water service to the entire population within the City limits. The City also provides water service to an estimated 682 people in the UGA outside the City limits. Additionally, the City provides water service to approximately 430 people outside the UGA. The estimated population

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served by the water system in 2017 was 14,322. The water system is expected to provide service to approximately 15,929 people in 2040. The City’s average household size is estimated to be 3.0 persons in the Snoqualmie Ridge area and 2.5 persons in all other areas of the City. Assuming 2.5 persons per household, this increase in population represents an estimated 643 new single-family residences.

Chapter 6 of the City’s Water System Plan focuses on Water Sources and Quality. This chapter summarizes the results of the future water rights evaluation, which compares the water rights of all existing sources with the system’s future 10-year and 20-year demand projections. The results of the future water rights evaluation indicate the City has sufficient instantaneous water rights to meet the demand through the year 2030, but insufficient instantaneous water rights to meet the demand through the year 2040. The Draft Snoqualmie Water System Plan is available for review on the City’s [website](#).

City Housing Need:

- The County needs to accommodate housing need (by income level) based on the state’s adopted standards. What is your proposal to accommodate housing need related to this request?**

The proposed amendment to the City’s housing growth target housing requires the City to adjust its projected affordable housing needs based on AMI. The table below demonstrates the City’s proposed affordable housing needs.

Proposed Amendment of Adopted Housing Targets				
	Adopted		Proposed Amendment	
Affordable Housing Needs (AMI⁴)	Housing Units	% of Total Target	Housing Units	% of Total Target
0-30% Non-PSH	472	31%	82	11.5%
0-30% PSH	248	17%	65	9%
>30-<50%	233	16%	98	13.5%
>50-<80%	82	5%	129	18%
>80-<100%	61	4%	158	22%
>100-<120%	69	5%	165	23%
>120%	335	22%	22	3%
Total	1,500		719	

The proposed housing needs differ from the currently adopted housing needs due to the context of the City’s available housing capacity. Per the [LCA](#), the City is unable to support a target of 22% of future housing for High Income households as this bracket is primarily served by detached single-family housing, requiring more raw land than the City has available. Additionally, the bulk of the City’s current housing capacity is in the form of pipeline projects which have set market rates inconsistent with extremely low and very low-income market needs.

Housing Needs at lower AMI are projected to be between 9% and 14% due to lack of supported and reliable public transit and private transportation operators. Snoqualmie Valley cities are physically disconnected from the urban growth boundary and the health

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care facilities and providers in urban areas of King County. Today only three King County Metro routes serve the Valley. The Valley residents seeking such facilities rely on connections from Interstate 90, State Route 18, State Route 202, and several smaller and congested County roads. These connections are either not served by transit or underserved requiring long wait periods and multiple connections. The two all-day Metro routes operate at frequencies of every 90-120 minutes and do not provide useful transit service. Furthermore, Metro's long-range plan "Metro Connects" shows increase bus service into and through the Valley by 2050. This unfunded plan would likely take many years to implement.

Non-market-rate housing has been successfully established with affordable housing projects like Picking Place and Panorama. The City continues to prevail with additional affordable housing incentives such as the first Multi-Family Tax Exemption issued in 2023 for the Mill Site. The City's LCA and other studies identify the opportunity to construct more affordable housing units at varying AMI to meet the City's proposed projected affordable needs.

Thank you for giving the City the opportunity to detail our reconciliation request. If you have any questions or need further information, please don't hesitate to reach out.

Cc: Emily Arteche, Snoqualmie Director of Community Development
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