



CITY OF CARNATION

**HOUSING TARGET  
RECONCILIATION  
REQUEST *2024***

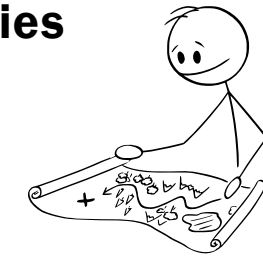
# WHAT UNANTICIPATED LOCAL CIRCUMSTANCES HAVE SHIFTED SINCE THE TARGETS WERE ADOPTED?

## 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.**

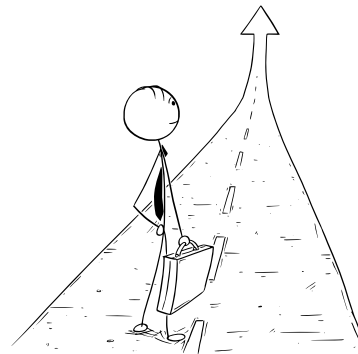
## Inconsistency with Countywide Planning Policies

“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
<b>303</b>	<b>176</b>	<b>341</b>	<b>271</b>	<b>251</b>	<b>434</b>	<b>204</b>	<b>653</b>	<b>273</b>	<b>385</b>



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



LOCAL  
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:



Extenuating circumstances since the targets were adopted.



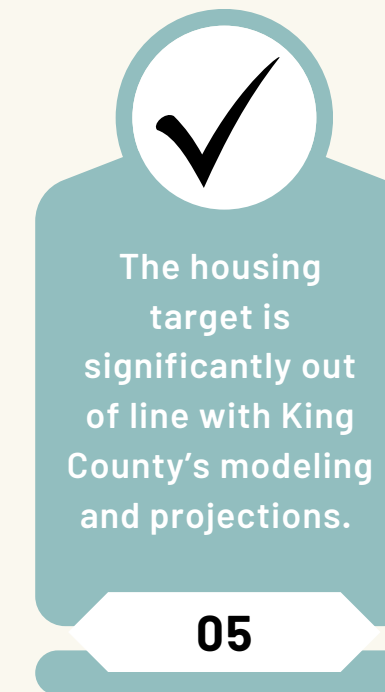
A public health or safety matter.



A significant effort to mitigate the extenuating circumstances.



Achieving the target would create a lack of consistency with Countywide Planning Policies.



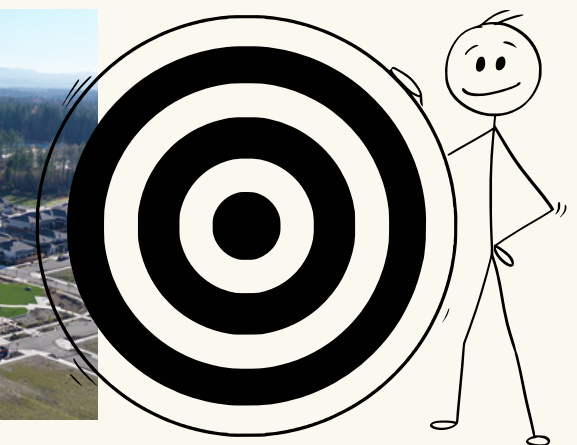
The housing target is significantly out of line with King County's modeling and projections.

## 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

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**Katherine Ross**

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Snoqualmie, Washington 98065  
(425) 888-5307 | [KRoss@Snoqualmiewa.gov](mailto: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 12<sup>th</sup> day of February 2024.



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Katherine Ross, Mayor

# Attachment A: Additional Information on Reconciliation Requests

Attest:

*Deana Dean*

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Deana Dean, City Clerk

Approved as to form:

*David A. Linehan*

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

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David Linehan, Interim City Attorney

# Attachment A: Additional Information on Reconciliation Requests



## Office of the Mayor

**Katherine Ross**

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Snoqualmie, Washington 98065  
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July 16, 2024

Dow Constantine  
King County Executive  
401 5<sup>th</sup> 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