

Affordable Housing Committee

KING COUNTY
GROWTH
MANAGEMENT
PLANNING COUNCIL

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Claudia Balducci
King County
Councilmember

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Sound Cities Association

Nigel Herbig
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Thatcher Imboden
Sound Transit

Ryan Makinster
Washington Multi-Family
Housing Association

Sunaree Marshall
On behalf of King County
Executive Dow Constantine

Ryan McIrvine
Renton Councilmember,
Sound Cities Association

Cathy Moore
City of Seattle
Councilmember

Teresa Mosqueda
King County
Councilmember

Lynne Robinson
Bellevue Mayor, Sound
Cities Association

Robin Walls
King County Housing
Authority

Maiko Winkler-Chin
On behalf of Seattle Mayor
Bruce Harrell

December 13, 2024

Rhonda Ender
City Manager
City of Carnation
4621 Tolt Ave.
Carnation, WA 98014

Dear Ms. Ender,

I am writing to acknowledge that the City of Carnation deferred Affordable Housing Committee (AHC) housing-focused review of their draft comprehensive plan until the Growth Management Planning Council decides what to recommend in response to Carnation's August 20, 2024 [growth target reconciliation request](#).

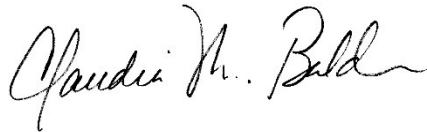
By direction of the Growth Management Planning Council and [King County Countywide Planning Policies](#) (CPP) Housing Chapter policy H-26, the AHC conducts a housing-focused review of all King County jurisdictions' draft periodic comprehensive plan updates, assessing the draft plans for alignment with the CPP Housing Chapter goals and policies prior to plan adoption and provides comment.¹

Once the Growth Management Planning Council decides what it will recommend in response to Carnation's request, the City should update the housing-related components of its comprehensive plan, CPP completeness checklist, and implementation strategies workbook and submit to the Committee.

The Affordable Housing Committee appreciates your communication about the growth target reconciliation request and looks forward to reviewing the City's draft comprehensive plan next year upon resolution of the request.

If you have questions or need additional information regarding aligning with the CPP Housing Chapter, please contact the Affordable Housing Committee plan review program staff at AHCplanreview@kingcounty.gov.

Sincerely,



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

CC Dow Constantine
Growth Management Planning Council Chair
King County Executive

¹ CPP H-26 states that "The Growth Management Planning Council or its designee will conduct a housing-focused review of all King County jurisdiction's draft periodic updates for alignment with the Housing Chapter goals and policies prior to plan adoption and provide comments."

Laura Hodgson
Washington State Department of Commerce

Plan Review Team
Puget Sound Regional Council

Plan Review Team
King County Affordable Housing Committee

Affordable Housing Committee

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Maiko Winkler-Chin
*On behalf of Seattle Mayor
Bruce Harrell*

December 13, 2024

Emily Arteche, AICP
Community Development Director
City of Snoqualmie
38624 SE River Street
Snoqualmie, WA 98065

Dear Ms. Arteche,

I am writing to acknowledge that the City of Snoqualmie deferred Affordable Housing Committee (AHC) housing-focused review of their draft comprehensive plan until the Growth Management Planning Council decides if it will recommend a response to Snoqualmie's August 26, 2024 [growth target reconciliation request](#).

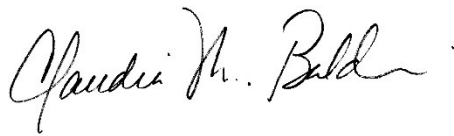
By direction of the Growth Management Planning Council and [King County Countywide Planning Policies](#) (CPP) Housing Chapter policy H-26, the AHC conducts a housing-focused review of all King County jurisdictions' draft periodic comprehensive plan updates, assessing the draft plans for alignment with the CPP Housing Chapter goals and policies prior to plan adoption and provides comment.¹

Once the Growth Management Planning Council decides what it will recommend in response to Snoqualmie's request, the City should update the housing-related components of its comprehensive plan, CPP completeness checklist, and implementation strategies workbook and submit to the Committee.

The Affordable Housing Committee appreciates your communication about the growth target reconciliation request and looks forward to reviewing the City's draft comprehensive plan next year upon resolution of the outstanding request.

If you have questions or need additional information regarding aligning with the CPP Housing Chapter, please contact the Affordable Housing Committee plan review program staff at AHCplanreview@kingcounty.gov.

Sincerely,



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

CC Dow Constantine
Growth Management Planning Council Chair
King County Executive

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Laura Hodgson
Washington State Department of Commerce

Plan Review Team
Puget Sound Regional Council

Plan Review Team
King County Affordable Housing Committee

MICHAEL R. BIRDSALL
PO Box 521
Hobart WA 98025

December 11, 2024

Re: Growth reconciliation requests of Carnation and Snoqualmie

King County Growth Management Planning Council

Good day!

I would like to share my thoughts about the proposed reconciliation requests, as a retired transportation planning engineer with decades of experience preparing transportation plans under the Growth Management Act. I speak also from recent experience interacting with King County regarding its newly adopted Comprehensive Plan Update. I provide transportation technical support to the Joint Team of Rural Organizations consisting of citizens in all areas of rural unincorporated King County. Today I speak on my own behalf, as there has been no time for the Joint Team to come together over the topics that have just today come to light.

The arguments for reduced allocations presented by Carnation and Snoqualmie seem to have merit based on the isolated locations of those cities, the lack of transit service to connect their future residents to jobs in the urban core, and the limited capacity of highways connecting them to the urban core. A letter from Paul Inghram of PSRC also references those concerns.

But the offer of Black Diamond to accept additional growth by transfer should be rejected. As you are aware, that city has approved developments far in excess of its allocation of regional growth in VISION 2050. Please understand: that excess growth has NEVER been considered in the regional travel forecasting model because PSRC only works with adopted growth targets. Therefore, there is no regional knowledge of the ultimate consequences of buildout of that city's plans, and the development review processes of that city DO NOT CONSIDER impacts outside their boundaries. This is an important lack of regional knowledge.

I can tell you, however, that the entire road system in the Rural Area around Black Diamond is being adversely affected by traffic growth as we speak. Furthermore, the trip generation associated with that city's ultimate future growth (beyond its approved growth targets) is the loose equivalent of the capacity of a new two-lane highway. But Black Diamond has steadfastly refused to consider any mitigation for such impacts on regional facilities beyond its borders.

I urge you to consider other responses to this situation such as the following:

1. Leave the allocations unchanged. The reality of on-the-ground conditions may result in those cities eventually being unable to achieve the targets, especially if they impose meaningful mitigation requirements on new developments to account for their impacts on the region's transportation system beyond their borders, and other such impacts. In another ten years, the regional allocations could be updated to reflect those realities.
2. Reallocate the units removed from those two cities back into the Metro and Core Cities categories, where such growth really belongs. After spreading the few hundred units involved across many large cities, the impact on any one city will be negligible and the regional growth strategy is well served.
3. Reallocate the units removed from those two cities to all other jurisdictions in the Cities and Towns category. This will have a small and distributed impact on regional systems.
4. If the transfer to Black Diamond is still preferred, then require that city to impose sufficient impact mitigation on this and ALL OTHER existing development proposals, so that the impact on regional systems outside that city is completely nullified based on rigorous technical analysis. For example, consider a multi-modal upgrade of SR 169 between Black Diamond to Renton to include additional through lanes and/or funding equivalent offsetting commuter transit service for 20 years.

Thank you for your hard work in implementing the regional growth strategy. Feel free to contact me if there are questions concerning my suggestions above.

Sincerely,



Michael R. Birdsall

Transportation Planning Engineer (ret.)



Puget Sound Regional Council

1201 Third Avenue, Suite 500 Seattle, WA 98101-3055 | psrc.org | 206-464-7090

December 11, 2024

King County Growth Management Planning Council

Dear Council Members,

Thank you for your important work leading the implementation of VISION 2050 and tracking growth targets for the county. As the Council considers the reconciliation requests by Carnation and Snoqualmie to adjust the cities' respective growth targets, we want to provide you with information about the Regional Growth Strategy and VISION 2050.

One of the principles GMPC developed to review reconciliation requests is that any shift in growth allocations should advance the Regional Growth Strategy. VISION 2050 and the Regional Growth Strategy provide direction for allocating growth among cities and counties according to types of communities. The vast majority of growth is directed to Metro and Core cities in the region, like Seattle, Bellevue, and Kent, that are home to designated regional centers and are served by high capacity transit and regional infrastructure.

Carnation and Snoqualmie are both identified in VISION 2050 in the "Cities and Towns" category. The region's Cities and Towns are expected to accommodate relatively less growth and remain relatively stable for the long term. Many Cities and Towns have limited transit service and are not connected to the regional high-capacity transit system. Due to their physical isolation, freestanding Cities and Towns surrounded by the rural area are expected to grow less than cities and towns in the contiguous urban growth area.

- Reducing the Cities and Towns overall allocation would improve consistency with the Regional Growth Strategy. The adopted Cities and Towns growth allocation is about 3,900 housing units higher than called for in the Regional Growth Strategy and a limited reduction in the overall total for the category would be in line with regional expectations.
- Shifting the growth allocation to Metro, Core, and HCT Communities would also support the Regional Growth Strategy. VISION 2050 calls for the majority of growth to be allocated to those cities with greater infrastructure and transit access. Increasing their targets while reducing the growth allocation for Cities and Towns would be consistent with that policy direction. While most cities do not want to change their targets at this stage of the comprehensive plan updates,

many of the larger cities have increased their capacity for housing and could accommodate additional housing growth.

- Shifting the growth to locations further from the contiguous UGA and to areas with poor transit and infrastructure services would be counter to the policy direction of the Regional Growth Strategy.

PSRC encourages any changes to the King County growth allocations to increase consistency with the Regional Growth Strategy and VISION 2050.

Please let me know if you need any further information about VISION 2050 and the Regional Growth Strategy.

Sincerely,

Paul Inghram

Paul Inghram, FAICP
Director of Growth Management