City of Snoqualmie 2015 Comprehensive Plan Update

1) Certification memo dated April 20, 2017 (see page 2). As of this Executive Board action, the City of Snoqualmie comprehensive plan is now fully certified for consistency with the transportation-related provisions of the Growth Management Act, VISION 2040, and Transportation 2040.

2) Certification report dated February 25, 2016 (see page 49). This report summarizes complete review of the 2015 comprehensive plan update and a certification condition for the city to address by June 2017.
CONSENT AGENDA

April 20, 2017

To: Executive Board

From: Councilmember Ryan Mello, Chair, Growth Management Policy Board
Councilmember Rob Johnson, Chair, Transportation Policy Board

Subject: Approve Certification of Comprehensive Plans for the Cities of Covington, Gig Harbor, North Bend and Snoqualmie

IN BRIEF

The Growth Management Policy Board and Transportation Policy Board have reviewed resolutions adopted by the cities of Covington, Gig Harbor, North Bend, and Snoqualmie and find that they are consistent with the Executive Board’s direction on January 26 regarding an alternative path for full certification for certain cities.

In making the recommendations, the Growth Management Policy Board noted that while action may signify support of full certification, doing so does not indicate acceptance of all arguments included in each of the city’s resolutions. Rather, full certification acknowledges that each city has substantively responded to each of the issues identified by the Executive Board and has made a commitment to continue efforts to act individually and in collaboration with other cities and counties, to manage growth and its impacts consistent with VISION 2040.

RECOMMENDED ACTION

The Executive Board should certify that the transportation-related provisions of the Covington, Gig Harbor, North Bend, and Snoqualmie comprehensive plan updates, as clarified by commitments made in adopted resolutions to support VISION 2040 and work with regional partners, conform to the Growth Management Act and are consistent with the multicounty planning policies and the regional transportation plan.

DISCUSSION

The 2015 comprehensive plan updates for the cities of Covington, Gig Harbor, North Bend, and Snoqualmie were conditionally certified last year as part of PSRC’s plan review process. Conditional certification allowed the cities to qualify for PSRC managed federal funding (and two of the cities were awarded funds), while working to address questions about planning for growth significantly greater than adopted targets.
The issue of growth targets for Small Cities resulted in a number of challenging policy discussions. Board members reiterated that planning consistent with GMA and VISION 2040, and regional coordination are important and need to be clearly supported in all local plans. There was also recognition that amending plans now and addressing the underlying issues related to growth targets will require ongoing work and coordination at the local and regional levels. In January, the Executive Board approved the Growth Management Policy Board’s recommendation to provide a new path for the affected Small Cities to become fully certified.

This path does not require cities to amend their plans now, provided they adopt a council commitment, such as a council-adopted resolution, to continue to work collaboratively on growth issues that clearly require a longer term to fully address.

**Local Resolutions**

Following the Executive Board’s approval of the new path to certification, Covington, Gig Harbor, North Bend and Snoqualmie proceeded toward development and adoption of council resolutions. Bonney Lake and Carnation are continuing to move ahead with comprehensive plan amendments to address the conditional certification requirements. Each of the adopted resolutions are attached.

**Covington**

Covington adopted a resolution that notes how their comprehensive plan embodies policies consistent with the Growth Management Act and VISION 2040. While the city recognizes that growth anticipated by a 2014 market study exceeds the adopted targets, it states the importance of managing the growth and mitigating its impacts. The resolution commits the city to continue to work collaboratively with regional and countywide planning organizations on growth target allocations and planning for growth consistent with those target updates. Covington has implemented a number of best practices to manage growth, including growth monitoring, impact fees, transportation concurrency requirements, nonmotorized transportation and transit planning, adequacy of public facilities, environmental regulations, and design review. The resolution also notes the city’s planned 20-year growth is fully within the city’s current city limits and no expansion of the Urban Growth Area (UGA) is contemplated in the comprehensive plan.

Covington’s resolution states that it has addressed the issues identified in the conditional certification and requests full certification of its comprehensive plan.

Exhibits referenced in the Covington resolution have previously been provided to the boards and are available from PSRC.

**Gig Harbor**

The resolution adopted by Gig Harbor notes that a goal of the Gig Harbor comprehensive plan is to support the integration and implementation of VISION 2040 at the local level. The city notes that the plan and the city’s development regulations demonstrate a commitment to managing growth consistent with the Regional Growth Strategy and addressing growth-related impacts, including the appropriate use of development regulations, impact fees and other tools. To partially offset the difference between targeted and anticipated growth, the city has worked collaboratively with other Pierce County jurisdictions to adjust small city growth targets, which
were recommended to be adjusted by the Pierce County Regional Council on March 16, 2017. The city has hired planning consultants to update the city’s Transportation Element, impact fees, travel demand model, and Active Transportation Plan to help manage growth and its impact on transportation. The city notes the need to allow sufficient time to complete this work, rather than rush to meet the current conditional certification deadline.

In its adopted resolution, the city commits to advance the integrity and mission of VISION 2040 and the regional growth strategy through the policies and strategies of its comprehensive plan. The resolution directs city staff to continue to work collaboratively with other cities, Pierce County, the Pierce County Regional Council, and PSRC on growth targets and planning for growth, and seeks full certification.

**North Bend**

North Bend notes in its resolution its intent to remain a small town, and its plans and provisions to preserve open space and to protect farm land and the Mountains to Sound Greenway. It also notes how the targets differ from the city’s capacity for housing and employment that could be achieved at build-out. In its resolution, the city commits to continue to work collaboratively with local and regional stakeholders to manage growth consistent with the Growth Management Act, VISION 2040, and the regional growth strategy; to continue to work collaboratively on the next round of growth target allocations; and to manage growth within its city and UGA boundaries. The city requests full certification of its 2015 comprehensive plan.

North Bend also reiterated their interest in seeing PSRC’s plan review process provide comments to communities early in the process to provide greater clarity regarding requirements. This comment was included in the Taking Stock report and will be carefully considered as PSRC updates the plan review process prior to the next round of GMA updates.

**Snoqualmie**

The resolution adopted by Snoqualmie acknowledges anticipated growth and the importance of managing its impacts on surrounding communities, rural and resource lands, and the regional transportation system. The resolution identifies several strategies the city employs to manage growth, including land conservation, growth monitoring, development agreements, impact fees, and concurrency requirements. The city states that no expansion of the UGA is planned to accommodate growth and that the city will prioritize consistency with the regional growth strategy when considering future land use, zoning and infrastructure changes that significantly affect growth capacity. Snoqualmie’s resolution is lengthy and states the city’s position on PSRC’s authority and the city’s actions that it feels are consistent with GMA and VISION 2040, but the resolution appears to address each of the key points identified by the Executive Board.

Each of the resolutions is a statement of intent by each individual community to work collaboratively to manage future growth. Each resolution speaks to local perspectives and also addresses areas of shared interest, including managing growth and its impacts, working collaboratively on growth and target setting, planning for growth within the urban growth area, and considering the regional growth strategy in long-range planning decisions. These statements correspond to the points identified by the Executive Board, which were developed with a recommendation of the Growth Management Policy Board and with input from the affected cities and county. Certification of the cities’ plans acknowledges the contribution and commitment of cities to work on managing growth. It does not mean full agreement on the individual perspectives expressed in each resolution.
Please let staff know if you have any questions about the attached resolutions that could be addressed prior to the board meeting.

For more information, please contact Paul Inghram at (206) 464-7549 or pinghram@psrc.org or Michael Hubner at (206) 971-3289 or MHubner@psrc.org.

Attachments:
PSRC Exec Board Approved action item 10 - January 26, 2017
Covington Resolution 2017-04
Gig Harbor Resolution 1074
North Bend Resolution 1749
Snoqualmie Resolution 1380
Executive Board – January 26, 2017

Agenda Item #10

Under this option, the cities would be asked to:

• Acknowledge that the planned housing and employment growth anticipated in the small city’s adopted comprehensive plan is greater than adopted growth targets for the city, and acknowledge the importance of managing that growth and mitigating its impacts, including on surrounding communities, rural and resource lands, and the regional transportation system.

• Continue to work collaboratively with regional and countywide planning organizations on growth allocations during the next and future and target updates and commit to planning for growth in future plan updates consistent with those collaboratively-set and adopted-target updates.

• Identify and continue strategies cities are using to manage and mitigate the impacts of growth.

• Reinforce the city’s commitment to managing its growth within current city and UGA boundaries, while minimizing impacts on surrounding rural and resource lands; commit to using the adopted countywide criteria for evaluating any requested UGA modifications.

• Commit to prioritize consistency with the Regional Growth Strategy when considering future land use and zoning changes and capital facilities investments.
RESOLUTION 1380

A RESOLUTION OF THE CITY OF SNOQUALMIE, WASHINGTON, CALLING FOR PUGET SOUND REGIONAL COUNCIL (PSRC) FULL CERTIFICATION OF THE TRANSPORTATION ELEMENT OF "SNOQUALMIE 2032," THE CITY OF SNOQUALMIE COMPREHENSIVE PLAN.

WHEREAS, the Puget Sound Regional Council ("PSRC") is a regional transportation planning organization ("RTPO") created by Interlocal Agreement for Regional Planning in the Central Puget Sound Area ("ILA"), adopted in 1991 and amended in 1993 by the County and all City governments in King, Snohomish, Pierce and Kitsap Counties; and

WHEREAS, PSRC operates pursuant to Chapter 47.80 of the Revised Code of Washington ("RCW"); and

WHEREAS, RCW 47.80.023 sets forth the duties of RTPOs; and

WHEREAS, Section VII(A)(1) of the ILA and RCW 47.80.023(2) require PSRC "[p]repare a regional transportation plan ["RTP"] as set forth in RCW 47.80.030 that is consistent with countywide planning policies if such have been adopted pursuant to chapter 36.70A RCW, with county, city, and town comprehensive plans, and state transportation plans"; and

WHEREAS, Section VII(A)(4)(a) of the ILA and RCW 47.80.023(3) require PSRC to "certify. . .that the transportation elements of comprehensive plans adopted by counties, cities, and towns within the region reflect the guidelines and principles developed pursuant
to RCW 47.80.026, are consistent with the adopted regional transportation plan, and, where appropriate, conform with the requirements of RCW 36.70A.070”; and

WHEREAS, Section VII(A) of the ILA requires that the ILA be “based on and developed from local comprehensive plans”; and

WHEREAS, various provisions of federal law, including 23 U.S.C. §§ 133(d) and (h) and § 134(k)(5), and the Regional Transportation Improvement Program (“TIP”) Policy Framework adopted by the PSRC, indicate that a Washington city may be prevented from receiving federal transportation funds or having local transportation projects included in the Regional TIP (itself a prerequisite for receipt of federal grant funds) if the transportation element of its locally-adopted comprehensive plan is not certified by the RTPO as being consistent with the RPTO’s adopted regional transportation plan;

WHEREAS, in 2003, PSRC adopted a “Policy and Plan Review Process” governing the process by which PSRC will review and certify the transportation elements of local comprehensive plans as consistent with the RTP; and

WHEREAS, PSRC thereafter amended the “Policy and Plan Review Process” to update it with references to PSRC’s current regional transportation plan (“Transportation 2040”);

WHEREAS, pages A-2 – A-4 of the Policy and Plan Review Process enumerate several criteria that PSRC will apply in reviewing the transportation element of a local comprehensive plan, and in determining its consistency with the RTP; and

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WHEREAS, none of the Policy and Plan Review Process criteria require examination of a city's rate of growth or a comparison of the city's planned growth to anticipated growth targets adopted in countywide planning policies; and

WHEREAS, the Policy and Plan Review Process also states (page A-3) that the PSRC provide comments to a local government on issues other than the transportation element of the local comprehensive plan, including comments on how the local government is using the PSRC's "Regional Growth Strategy" (which is different from, and not a part of the adopted RTP) in the local government's planning process, but the Policy and Plan Review Process expressly indicates that "this area of coordination is voluntary"; and

WHEREAS, the Growth Management Act ("GMA") was adopted in 1990 and amended subsequently in 1991, 1995, 2000 and 2003; and

WHEREAS, RCW 36.70A.070 requires that certain cities including the City of Snoqualmie prepare and adopt a GMA comprehensive plan containing seven (7) mandatory elements or chapters, including a transportation element, each of which must meet multiple, specified statutory criteria; and

WHEREAS, on January 23, 1995, the City Council adopted Ordinance No. 739, adopting the Snoqualmie Vicinity Comprehensive Plan 1994 for the purpose of complying with GMA planning requirements; and

WHEREAS, thereafter, the City Council adopted multiple ordinances and resolutions amending the Snoqualmie Vicinity Comprehensive Plan 1994, including Ordinance No. 816 on April 13, 1998; Resolution No. 545 on March 13, 2000; Resolution No. 619 on November 13, 2001; and Resolution No. 711 on May 24, 2004; and

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WHEREAS, as required RCW 36.70A.115, the Snoqualmie Vicinity Comprehensive Plan and all subsequent updates provided sufficient capacity of land suitable for development within the City to accommodate the anticipated housing and employment growth as forecast in the State Office of Financial Management ("OFM") twenty-year growth forecast and allocated to the City in growth targets adopted by the King County Growth Management Planning Council ("GMPC") and set forth in the King County Countywide Planning Policies ("CPPs"); and

WHEREAS, multiple decisions of the Central Puget Sound Growth Management Hearings Board hold that "a city does have the discretion to have population capacity in its plan greater than the county's allocation for that city, subject to the [GMA's] capital facilities and concurrency constraints, and absent a policy in the CPPs that specifically prohibits it"; and

WHEREAS, the Growth Board's decisions were based the rationales that: (a) the GMA makes cities the primary providers of urban services; (b) allowing a city to plan for even more growth than has been allocated to it by the county bolsters the Act's first two planning goals by encouraging that city to accept in its comprehensive plan as much growth as it determines it can adequately accommodate, subject to the Act's other constraints; and (c) each city retains the local prerogative of determining just how the regional policy allocation of population and employment is going to be accommodated and configured through local development regulations and other exercises of the land use power of cities; and

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WHEREAS, consistent with applicable Growth Board precedent, the Snoqualmie Vicinity Comprehensive Plan 1994 and subsequent amendments thereto planned for more growth than allocated the City by the CPPs, primarily due to two large, innovative, master-planned developments known as Snoqualmie Ridge I and Snoqualmie Ridge II; and

WHEREAS, although the population and employment growth from the SR I and SR II developments was significant, if measured in terms of a percentage increase above the City’s previous population level, both were consistent with the GMA and protected the existing City and surrounding rural lands, by concentrating residential development in compact, urban densities of various forms and price points, including apartments, single-family homes, townhouses, duplexes, and affordable housing; by providing modern urban infrastructure (water, sanitary sewer, and separate storm sewer systems) and a major upgrade of the City’s wastewater treatment plant and water system; and the transfer of development rights and/or conveyance of thousands of acres of property, in the vicinity of Snoqualmie Falls, Rattlesnake Mountain and the headwaters of the Raging River, into public ownership and/or subject to conservation easements; and

WHEREAS, in April, 2008, the PSRC adopted “VISION 2040,” which PSRC has denominated as the “Regional Growth Strategy,” which document describes as an “ambitious and achievable approach to promote a focused regional growth pattern” that “builds on current growth management plans, and recommit[s] the region to directing future development into the urban growth area”; and

WHEREAS, the Regional Growth Strategy allocates population generally by “regional geographies “ (i.e., Metropolitan Cities, Core Cities, Large Cities, Small Cities,
Unincorporated Urban Growth Areas, and Rural Areas), with the expectation that, collectively, Small Cities would account for 5% (35,000 people) of population growth in King County between 2000 and 2040 and 8% (136,000 people) of population growth over the 4-county PSRC region in 2000-2040, and 3% (22,000) of new jobs in King County and 6% (76,000) of new jobs in the 4-county PSRC region; and

WHEREAS, VISION 2040’s Regional Growth Strategy acknowledges that the relative distribution of anticipated population and employment growth to individual cities will be determined through countywide target-setting, while VISION also explicitly recognizes that: (a) “A growth target is the minimum number of residents (or in the case of employment, the minimum number of jobs) a given jurisdiction is expected to accommodate by some future year” (p. 47); (b) target-setting determinations need to take into account local circumstances (p. 17) (c) regional geographies within the Regional Growth Strategy provide a framework for the distribution of the region’s forecast growth, but the Strategy “did not get too specific at the individual city level” because “in some instances an individual city may stand alone within a regional geography category” (p. 16); and (c) “that as cities continue to grow, both through net increase and through annexation of unincorporated areas, their population and employment levels may change significantly” (p. 16); and

WHEREAS, VISION 2040 further subdivides the Small Cities category into three subtypes: Cities Inside the Contiguous Urban Growth Area,” “Small Residential Towns, and “Freestanding Cities and Towns,” with the City of Snoqualmie included as a “Freestanding City”; and

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WHEREAS, VISION 2040 (at page 52) states that Freestanding Cities are, “Under
the Growth Management Act, . . . part of the urban growth area,” and that “VISION 2040
calls for these communities to be the primary places for meeting the service needs —
including shopping, jobs, and services — of both their residents and residents in nearby
rural areas,” as well as “focal points of rural-based industries and commerce”; and

WHEREAS, VISION 2040 does not itself include population and employment
growth targets for individual cities but, instead, allocates percentages of growth to the
various types of cities in the regional geographies that are part of the Regional Growth
Strategy; and

WHEREAS, on May 20, 2010, the PSRC adopted Transportation 2040, which
constitutes PSRC’s Regional Transportation Plan (RTP); and

WHEREAS, T2040 references VISION 2040, and describes VISION 2040’s
Regional Growth Strategy as containing “numeric guidance” for cities to use as they
develop new population and employment growth targets and update local comprehensive
plans, and consistent with VISION 2040’s statement that “[a] growth target is the minimum
number of residents (or in the case of employment, the minimum number of jobs) a given
jurisdiction is expected to accommodate,” T2040 does not describe population and
employment growth targets as “ceilings” or “maximums” rather than the “floors” or
“minimum number” as set forth in the Growth Management Hearings Board decisions and
VISION 2040; and

WHEREAS, Chapter 5 of T2040 sets forth regional transportation programs and
projects, and expressly includes maintenance, preservation and operation of local streets,
roads and pathways as part of the regional transportation projects program, even if those local streets and roadways are not listed as being part of the Metropolitan Transportation System; and

WHEREAS, Chapter 5 of T2040 does not state that a city’s growth in excess of a countywide growth target will prevent that city’s transportation element from being certified as consistent with T2040; and

WHEREAS, Chapter 4 of T2040 outlines a strategy for financing the RTP’s transportation projects and programs, and that strategy does not indicate state that a city’s growth in excess of a countywide growth target will prevent that city’s transportation element from being certified as consistent with T2040, nor does it state that such a city may not receive federal transportation funds from PSRC for the city’s transportation projects; and

WHEREAS, Chapter 7 of T2040 states that “PSRC has established a process for the review of local, countywide and transit agency plans,” which is a reference to PSRC’s 2003 Adopted Policy and Plan Review Process”; and

WHEREAS, Chapter 7 of T2040 does not state that countywide growth targets referred to earlier in T2040 as “numeric guidance” constitute “ceilings” or maximums on a city’s population or employment growth, rather than “floors” or minimums that must be achieved; and

WHEREAS, T2040 includes a glossary that defines “Target (also Growth Target)” (at page G-14) as “the number of either residents, jobs or both that a jurisdiction is expected
to plan for in its comprehensive plan,” and T2040’s glossary does not define “Target” as the maximum number of residents, jobs or both for which a jurisdiction may plan; and

WHEREAS, T2040 includes as Appendix C various Multicounty Planning Policies (“MPPs”), which T2040 indicates are part of the “regional guidelines and principles” established under RCW 47.80.026 for regional and local transportation planning purposes; and

WHEREAS, the MPPs do not include any policy that requiring a local comprehensive plan to adhere generally or specifically to VISION 2040, nor do the MPPs include any policy converting a city’s population or employment growth target from the “minimum number” as defined by VISION 2040;

WHEREAS, the MPPs state a general goal that “[t]he region, countywide planning bodies, and local jurisdictions will work together to set population and employment growth targets consistent with the regional vision”; and

WHEREAS, MPP-DP-3 states that jurisdictions should “use consistent countywide targeting processes for allocating population and employment growth consistent with the regional vision, including establishing: (a) local employment targets, (b) local housing targets based on population projections, and (c) local housing and employment targets for each designated regional growth center,” but this language does not indicate that countywide population and employment targets constitute a maximum or “ceiling” as opposed to the “minimum” (or floor) as defined in VISION 2040;

WHEREAS, following adoption of VISION 2040, consistent with VISION 2040’s definition of “Growth Target,” and consistent with the Growth Management Hearings

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Board’s ruling that “a city does have the discretion to have population capacity in its plan greater than the county’s allocation for that city” King County demographer Chandler Felt and now-current PSRC staff member Michael Hubner provided written guidance to cities during the period 2009-2011, (Exhibits A, B and C), stating that growth targets are:

- “adopted in CPPs as policy statement” representing the “[m]inimal amount of growth that local govts must plan for over a 20-year planning period”;
- “Growth targets represent: Hybrid of policy (what we’d like to happen) and forecast (what we think will happen)” and “Floor” for local plans, not a “ceiling”
- “a floor in the sense that the City, through its comprehensive plan and development regulations and major-development approval should provide capacity for at least that amount of growth. It’s not a ceiling. . .there is no penalty under the CPPS for a city that exceeds its target over the 25 year period. A number of cities have exceeded earlier target rates, and that’s fine”; and

WHEREAS, as required by the GMA, RCW 36.70A.106, and beginning in 2010, City of Snoqualmie staff, citizens, and the Snoqualmie Planning Commission began a detailed and thorough public process to consider updates and amendments to the City of Snoqualmie Comprehensive Plan, now known as “Snoqualmie 2032”; and

WHEREAS, consistent with previous updates to the Snoqualmie Vicinity Comprehensive Plan 1994, the Snoqualmie 2032 update was based on anticipated population and employment growth in excess of the minimum growth targets shown for Snoqualmic in the King County CPPs; and
WHEREAS, like VISION 2040, Snoqualmie 2032 expressly describes the King County CPP’s household and employment targets as “representing the minimum number of households and jobs a city must accommodate in its 20-year planning period”; and

WHEREAS, Snoqualmie 2032 also states at page 7-4 that “Cities must demonstrate capacity to meet GMPC targets though a target does not represent a ceiling. This was noted in the July 15, 2009 presentation, “King County Housing and Employment Growth Targets, 2006 – 2031 Planning Period,” to the King County Growth Management Planning Council” (Exhibit B); and

WHEREAS, Snoqualmie 2032 candidly acknowledges that the population and employment targets used in Snoqualmie 2032 exceed the targets in the King County CPPs for several reasons, including:

- King County CPP targets set subsequent to VISION 2040’s adoption in 2009 did not take into account “pipeline” population growth already in progress via the Snoqualmie Ridge II development agreement;
- The King County CPP targets did not include previously-planned population or employment growth for the expansion of the Salish Lodge & Spa, to which the City had committed in 2004 via a development agreement;
- Unlike the treatment of other cities, King County’s CPP targets did not include potential population or employment growth for Snoqualmie’s Urban Growth Area, which included the former Weyerhaeuser Snoqualmie Mill site that was subsequently annexed into the City;
- “Planning that ignores the growth implied by Snoqualmie Ridge II, along with Snoqualmie’s Urban Growth Area development capacity, would be irresponsible to the development realities of the City – especially given its existing, executed, in-progress development agreements.”

WHEREAS, the total population and jobs growth anticipated in Snoqualmie 2032 (15,552 population plus 4,884 jobs = 21,287) remains below the current Small City threshold of combined population/jobs total of 22,500; and

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WHEREAS, prior to its adoption by the Snoqualmie City Council, the Draft Snoqualmie 2032 Comprehensive Plan Update was sent for comment to King County and various agencies within the State of Washington, including the Washington Department of Commerce; and

WHEREAS, the Draft Snoqualmie 2032 Comprehensive Plan was also submitted to Puget Sound Regional Council (PSRC) for review and comment on April 21, 2014, and subsequent revisions were made to the draft plan to address the PSRC’s comments; and

WHEREAS, no agency – not King County, PSRC, or the Department of Commerce – commented that the population and employment assumptions on which Snoqualmie 2032 was based required revision to lower them below the King County CPP targets; and

WHEREAS, after extensive citizen input gathered through various means over a two-year period, including input from the Planning Commission, the Sustainability Speaker Series, the Economic Development Commission, the Park Board, the Arts Commission, and the 2010 Snoqualmie Citizens Survey, on December 8, 2014 the Snoqualmie City Council adopted Snoqualmie 2032, the 2014 Comprehensive Plan Update (“Snoqualmie 2032” or “Update”) via adoption of Ordinance No. 1148; and

WHEREAS, during 2014, while the review process for Snoqualmie 2032 was underway, PSRC staff provided additional guidance to planning staff from counties, cities and towns concerning, inter alia, growth targets, and that guidance (Exhibit D) expressly confirmed that the targets “ensure “floors” but not “ceilings”; and

WHEREAS, pursuant to RCW 36.70A.320(1), a GMA Comprehensive Plan is presumed valid upon its adoption, and remains valid unless a petition for review is filed
within sixty (60) days of the date of publication demonstrating that the Comprehensive Plan is inconsistent with the requirements of the goals and requirements of the GMA; and

WHEREAS, no petition for review challenging Snoqualmie 2032’s compliance with the goals and requirements of the GMA was ever filed; and

WHEREAS, in the absence of the timely filing of a petition for review challenging a GMA Comprehensive Plan and a subsequent determination of noncompliance and invalidity issued by a Growth Management Hearings Board, the GMA compliance of an adopted Comprehensive Plan may not be collaterally attacked, per the holding of Division I of the Washington Court of Appeals in *BD Lawson Partners, LLP v. Central Puget Sound Growth Management Hearings Board*, 165 Wn. App. 677 (Div. 1 2010); and

WHEREAS, therefore, Snoqualmie 2032 is valid and binding, and may not be collaterally attacked; and

WHEREAS, on February 25, 2016 PSRC issued a Plan Review Report & Certification Recommendation for the City’s Update; and

WHEREAS, per PSRC’s May 10, 2016 letter *(Exhibit E)*, received by the City approximately 17 months after adoption of Snoqualmie 2032 by the Snoqualmie City Council, the PSRC’s Executive Board “conditionally certified” the transportation-related provisions of Snoqualmie 2032 as conforming to the GMA and consistent with multi-county planning policies and the regional transportation plan; and

WHEREAS, the stated basis upon which PSRC conditionally certified Snoqualmie 2032 was that the Update “cannot not fully align” with the adopted King County

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countywide population and employment growth targets, and that land use assumptions in
local comprehensive plans are bound by consistency requirements” not to exceed
countywide targets; and

WHEREAS, PSRC’s certification included conditions purporting to require the
Snoqualmie City Council to adopt a resolution to “adjust” (i.e., lower) the land use
assumptions in Snoqualmie 2032, and then to revise downward transportation modeling,
estimates of demand for new infrastructure and financing, accordingly; and

WHEREAS, conditions of PSRC certification also required the City to adopt a
resolution authorizing staff to take action to address conditions of certification; and

WHEREAS, but for its contention that Snoqualmie was improperly planning for
population and job growth in excess of the numbers allocated to Snoqualmie by the King
County CPPs, PSRC otherwise found that the transportation element of Snoqualmie 2032
is not only consistent with the Regional Transportation Plan, but includes multiple
“exemplary provisions”; and

WHEREAS, on June 27, 2016 the Snoqualmie City Council adopted Resolution
No. 1348, authorizing the Mayor and staff to take such steps as necessary to address and
resolve the conditions described in the certification and Plan Review Report attached to
PSRC’s May 10, 2016 letter; and

WHEREAS, PSRC’S conditional certification indicated that the conditional status
would remain until the City addresses the inconsistency between the anticipated growth
included in Snoqualmie 2032 and the King County housing and employment growth
targets; and

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WHEREAS, notwithstanding its conditional certification of Snoqualmie and other cities, PSRC staff's February, 2016 Growth in the Puget Sound Region” report to PSRC’s Transportation Policy Board concludes that strong population and jobs growth has occurred in the region, mostly focused in regional centers, consistent with past cycles and consistent with VISION 2040;

WHEREAS, throughout the remainder of 2016, City of Snoqualmie elected officials and staff extensively met, reviewed, commented, and coordinated with PSRC, King County, Sound Cities Association, and other cities within King County to address and resolve the City’s conditional certification conditions as contained in the PSRC Plan Review Report; and

WHEREAS, five other cities (Bonney Lake, Carnation, Covington, Gig Harbor, and North Bend) were also conditionally certified by PSRC for similar reasons; and

WHEREAS, based upon a January 5, 2017 recommendation by the PSRC Growth Management Policy Board, the PSRC Executive Board approved a “new path forward” on January 26, 2017 for full certification of the six small cities (Exhibit F); and

WHEREAS, the PSRC “new path forward” calls for cities seeking full certification to make a short list of statements to the PSRC Executive Board; and

WHEREAS, the Snoqualmie City Council believes that PSRC must fully certify Snoqualmie 2032’s transportation element, because the rulings of the Growth Management Hearings Board, VISION 2040, T2040 and statements by King County and PSRC staff all indicate that countywide population and employment targets are a “minimum” and a city may plan for growth that exceeds them so long as other GMA requirements are met; and

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WHEREAS, the Snoqualmie City Council nevertheless desires to utilize the “new path forward” and indicate its intention to work collaboratively with PSRC and King County in future planning efforts;

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

Section 1. Recitals Incorporated. The “Whereas” provisions above and associated attachments shall constitute findings of fact and conclusions of law, and are adopted and incorporated by reference as if fully set forth herein.

Section 2. Full Certification. PSRC must fully certify the transportation element of the City of Snoqualmie Comprehensive Plan (aka “Snoqualmie 2032”), because Snoqualmie 2032 fully complies with the four requirements stated for certification at pages A-2 – A-3 of PSRC’s 2003 Adopted Policy and Plan Review Process:

A. Snoqualmie 2032 “effectively addresses” the Growth Management Act requirements for transportation elements, as the PSRC certification letter (Exhibit E) concluded at page 3;

B. Snoqualmie 2032 complies with Transportation 2040, the Regional Transportation Plan, as measured through comparison of the transportation-related provisions of Snoqualmie 2032 with Transportation 2040’s policies and provisions; as required by the Adopted Policy and Plan Review Process;

C. Snoqualmie 2032 complies with the Multicounty Planning Policies (MPPs) adopted as T2040’s regional guidelines and principles under RCW 47.80.026, because
although MPP-D-3 indicates that countywide planning targeting process should be used for allocating growth, VISION 2040 and T 2040 indicate that, consistent with the law established by the Growth Management Hearings Board, the CPP growth targets are minimums, and not maximums; and

D. Snoqualmie 2032 includes adequate provisions regarding air quality, as the PSRC certification letter (Exhibit E) concluded at page 3;

Section 3. Statements Regarding “New Path Forward.” In addition to but not in lieu of the foregoing, PSRC must fully certify the transportation element of Snoqualmie 2032 in view of the City’s acknowledgments and statements below, as requested by the PSRC Executive Board as part of the “new path forward”:

a. The City acknowledges that Snoqualmie 2032 expressly states that it is anticipating marginally greater housing and employment (jobs) growth than the 2009 King County GMPC-adopted growth targets for the City, and that it does so because:

i. VISION 2040 states at page 47 that “A growth target is the minimum number of residents (or in the case of employment, the minimum number of jobs) a given jurisdiction is expected to accommodate by some future year”;

ii. Decisions by the Central Puget Sound Growth Management Hearings Board hold that because growth targets represent a “minimum,” a city may permissibly plan to accommodate a greater number of households and jobs than stated in countywide growth targets;
iii. Cities were instructed by King County Demographer Chandler Felt and current PSRC staff member Michael Hubner that the growth targets are “a “floor” for local plans, not a “ceiling” (Exhibit C);

iv. King County CPP targets set subsequent to VISION 2040’s adoption in 2009 did not take into account “pipeline” population growth already in progress via the Snoqualmie Ridge II development agreement;

v. King County CPP targets did not include previously-planned population or employment growth for the expansion of the Salish Lodge & Spa, to which the City had committed in 2004 via a development agreement;

vi. Unlike the treatment of other cities, King County’s CPP growth targets for Snoqualmie did not include potential population or employment growth for Snoqualmie’s Urban Growth Area, which included the former Weyerhaeuser Snoqualmie Mill site that was subsequently annexed into the City;

vii. “Planning that ignores the growth implied by Snoqualmie Ridge II, along with Snoqualmie’s Urban Growth Area development capacity, would be irresponsible to the development realities of the City – especially given its existing, executed, in-progress development agreements.”

Regardless of the level of growth planned for, the City acknowledges the importance of managing growth and mitigating its impacts, if any, including on surrounding communities, rural and resource lands, and the regional transportation system.

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b. The City of Snoqualmie will continue to work collaboratively with regional and countywide planning organizations on growth allocations during the next and future regional growth strategy and population and employment growth target updates, and commits to planning for growth in future City comprehensive plan updates consistent with such updated growth targets that are collaboratively set by both the Snoqualmie City Council and countywide planning organizations.

c. The City of Snoqualmie has and continues to plan and implement best practices in growth management and mitigation, in order to meet our community's needs and to be a good partner to surrounding jurisdictions and the region. Such best practices in mitigating growth impacts that the City has used and will continue to use include, but are not limited to: land conservation, preservation of open space and culturally significant lands, growth monitoring, annexation implementation plans, collaborative subarea and/or master site planning with land owners prior to annexation and/or development, development agreements, latecomer agreements, impact fees, setting and adhering to transportation concurrency requirements, non-motorized transit planning, ensuring adequacy of public facilities, enforcement of environmental regulations, and design review. The Snoqualmie City Council commits to continue the City’s use of these strategies, measures, and actions to manage and mitigate the impacts of future growth.

d. Snoqualmie 2032 plans for a portion of the City’s anticipated new growth and development by the year 2032 to occur within the unincorporated, current Urban Growth Area (UGA) boundary. Snoqualmie 2032 identifies these UGA Planning Areas as Snoqualmie Hills East and Snoqualmie Hills West. The City of Snoqualmie is committed

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to managing the Snoqualmie 2032-planned growth within the then-current city and Urban Growth Area boundaries, and to mitigating its impacts (if any) on surrounding rural or resources lands as set forth in Section 3.a and 3.c above. Snoqualmie 2032 does not plan for or rely upon annexation or development of land outside Snoqualmie’s UGA in order to accommodate the population or employment growth for which Snoqualmie 2032 plans. Policy 7.1.5 of Snoqualmie 2032 does call for submission of docket requests during King County Comprehensive Plan update cycles, addressing Urban Growth Area boundary adjustments, in order to provide the full range of urban commercial, institutional and other nonresidential uses needed to serve the Snoqualmie community. The City will evaluate its requested UGA modifications using such adopted statutory, countywide or other applicable UGA adjustment criteria (if any) in effect at the time of the request.

e. Until completion of the process outlined in Section 3.b above, the City will prioritize consistency with the Regional Growth Strategy when considering future land use and zoning changes and capital facilities investments that significantly increase the capacity for housing and jobs in the city or UGA above the levels planned for in Snoqualmie 2032.

Section 4. Limitation. Nothing in this Resolution shall be construed as amending or altering the City of Snoqualmie Comprehensive Plan, “Snoqualmie 2032,” the Snoqualmie municipal code or such other Snoqualmie development regulations adopted under Ch. 36.70A RCW, nor granting to the Puget Sound Regional Council or any other body or person any authority or powers beyond those granted by the Growth Management Act or other applicable law.

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PASSED by the City Council of the City of Snoqualmie, Washington, this 27th day of March, 2017.

Matthew R. Larson, Mayor
City of Snoqualmie

Attest:

Jodi Warren/MMC, City Clerk

Approved as to form:

Bob C. Sterbank, City Attorney
King County Housing and Job Growth Targets: Update 2009

Growth Management Planning Council
April 15, 2009

Michael Hubner
Suburban Cities Association

Chandler Felt
King County Strategic Planning and Performance Management
Allocation of Growth Targets

- Growth Management Planning Council (GMPC)
  - Body of city / county elected officials oversee Growth Mgmt
  - Adopts Countywide Planning Policies (CPPs)
  - CPPs must be ratified by county and cities

- CPPs and Growth Targets
  - Growth Targets are adopted in CPPs as policy statement
  - Minimal amount of growth that local govts must plan for over a 20-year planning period
  - Expressed as household- and job-growth numbers
  - Current targets cover 2002-2022 planning period
  - GMPC considering targets update in its 2009 work plan
  - Proposed target update pushes planning out 9 years to 2031
King County Housing and Employment Growth Targets
Update for 2006-2031 Planning Period

King County Growth Management Planning Council
July 15, 2009

Michael Hubner
Suburban Cities Association

Chandler Felt
King County
Background

- **Planning for growth under GMA**
  - Duty to accommodate 20-year population projections
  - Counties collaborate with cities on allocations
  - Planning for residential, commercial, and industrial land needs through comprehensive plans and Buildable Lands evaluation
  - RCW 36.70A.110, RCW 36.70A.130, RCW 36.70A.215

- **Growth targets adopted as Countywide Planning Policy**
  - Household/housing and employment targets set for each city and unincorporated area
  - Current targets extend to the year 2022

- **Growth targets represent:**
  - Hybrid of *policy* (what we’d like to happen) and *forecast* (what we think will happen)
  - “Floor” for local plans, not a “ceiling”
  - Planning goals, not a guarantee that growth will occur
Exhibit C

From: Felt, Chandler [mailto:Chandler.Felt@kingcounty.gov]
Sent: Tuesday, March 02, 2010 5:33 PM
To: tswhanson@hotmail.com
Cc: Hubner, Mike; Steve Pilcher
Subject: Proposed new growth targets

Councilmember Hanson:

Thanks very much for your phone call yesterday. You're certainly asking the right questions about the proposed new housing and job growth targets that are being considered by each King County city at present.

The proposed growth targets are the third set of targets for King County cities under the Growth Management Act (GMA). They help to implement the GMA and various documents adopted as part of the GMA, such as King County's Countywide Planning Policies (CPPs) and the PSRC's Vision2040 regional plan. Vision2040 calls for "Small Cities," including Black Diamond, to take a modest share of the county's overall growth, in order to allow major Urban Centers to absorb the majority of growth. Note that of the county's 18 Small Cities, Black Diamond has the highest residential target, reflecting your development plans. This set of targets was prepared by a committee of planning directors, the Targets Committee, which met monthly for more than a year to grapple with issues of how and where within the county to accommodate the growth that the State tells us is coming over a 25-year period. The Committee considered several factors, including guidance from Vision2040, focusing of growth into major Urban Centers, equity among cities, buildable land capacity and past and expected trends of growth.

The Growth Management Planning Council of elected officials agreed, and adopted the proposed set of targets in November 2008, to send to the King County Council and on to the cities for ratification.

You referred to the balance of housing and job growth — that is an important part of these targets as well. It's good that Black Diamond is trying to provide housing close by expected job opportunities. Accommodation of both housing and job growth is key to being able to maintain housing affordability and opportunities for economic development — best wishes with your efforts to balance those.

Let me cut to the chase. It's important to keep in mind that Black Diamond's proposed targets of 1,900 housing units and 1,040 jobs over 25 years (2006 - 2031) are a floor, not a ceiling. Think of them as the minimum amount of growth the City should plan for in order to absorb your share of King County's total growth. It's a floor in the sense that the City, through its comprehensive plan and development regulations and major-development approvals should provide capacity for at least that amount of growth. It's not a ceiling...there is no penalty under the CPPs for a city that exceeds its target over the 25 year period. A number of cities have exceeded earlier target rates, and that's fine.

Even if a Small City plans for higher growth levels than called for in Vision2040 or the targets, there are ways to mitigate the regionwide impacts of that growth. For instance, new development can strive for a compact footprint and a more complete mix of housing and commercial uses to encourage pedestrian activity, while providing open space. Further, I understand the City is using Transfer of Development Rights to minimize impacts on adjoining rural and resource areas.

I hope that helps explain some of the context and application of these proposed targets. Please follow up with me, or with Michael Hubner of the Suburban Cities Association if we can provide additional information.

- Chandler Felt, Demographer and Planner
- King County Office of Strategic Planning
- (206) 283 - 9693
The First Round of Growth Targets Since VISION 2040 Adoption

Growth Management Policy Board
March 2014
## Best Practices in GM by the Numbers

<table>
<thead>
<tr>
<th>Best Practices</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adopt local policies to guide process</td>
<td>All address the Regional Growth Strategy</td>
</tr>
<tr>
<td></td>
<td>Specific policies vary in detail</td>
</tr>
<tr>
<td>Make local processes more transparent</td>
<td>Housing Targets are positive step forward</td>
</tr>
<tr>
<td>Agree locally on purpose of rural targets</td>
<td>Varies but all recognize issue and taking steps</td>
</tr>
<tr>
<td></td>
<td>Long-term land trends makes this difficult</td>
</tr>
<tr>
<td>Consider jobs-housing balance</td>
<td>Addressed through RGS and establishment of employment targets</td>
</tr>
<tr>
<td>Allow other counties to comment</td>
<td>Allowed but not utilized, reliance on PSRC</td>
</tr>
<tr>
<td>Adjust zoning and regulations to implement</td>
<td>Limited implementation – zoning changes ensure “floors” but not “ceilings”</td>
</tr>
<tr>
<td>Establish monitoring process</td>
<td>Addressed at regional level</td>
</tr>
<tr>
<td></td>
<td>Some good countywide monitoring</td>
</tr>
</tbody>
</table>

Attachment: Snoqualmie Resolution 1380  (1960 : Small Cities Certification)
Centers Designation Criteria

Criteria include **minimum thresholds** for the amount and intensity of development now and in the future.

<table>
<thead>
<tr>
<th>Center Type</th>
<th>Existing</th>
<th>Planned</th>
</tr>
</thead>
<tbody>
<tr>
<td>RGC</td>
<td>18 AUs/Ac</td>
<td>45 AUs/Ac</td>
</tr>
<tr>
<td>MIC</td>
<td>10,000 jobs</td>
<td>20,000 jobs</td>
</tr>
</tbody>
</table>

Planned land use intensity can be calculated based on existing conditions and adopted targets for centers.

Important: **Thresholds are a floor, not a ceiling!**

Required for newly designated centers, recommended for all others.
May 10, 2016

The Honorable Matt Larson, Mayor
City of Snoqualmie
38624 SE River St.
Snoqualmie, WA 98065

Subject: Certification of Snoqualmie 2015 Comprehensive Plan

Dear Mayor Larson,

I would like to extend my thanks to you and your staff for working with PSRC through the comprehensive plan update and certification process, as well as my congratulations on completing the periodic update. On April 28, 2016, the Puget Sound Regional Council’s Executive Board acted to certify the Snoqualmie 2015 Comprehensive Plan. This recognizes that the plan addresses the certification requirements – including conformity with Growth Management Act requirements for transportation planning and consistency with VISION 2040 and Transportation 2040. With a certified plan the city is eligible to participate in the PSRC funding process and the Regional Transportation Improvement Program.

PSRC has prepared a certification and consistency report (attached) that contains a summary of PSRC’s review of the comprehensive plan and highlights a number of exemplary provisions of the plan. The report also identifies conditions of certification that the city must address as well as other areas where future work is needed to address aspects of VISION 2040, Transportation 2040, or the Growth Management Act. PSRC staff consulted with city staff in the development of the report and we look forward to working with you and your staff on next steps.

Thank you for working with us through the plan review and certification process. Additional resources and information are available online at psrc.org/growth/planreview. If you or your staff have questions or need additional information regarding the review of local plans or the certification process, please contact Paul Ingham at 206-464-7549 or PIngham@psrc.org.

Sincerely,

Josh Brown, Executive Director
Puget Sound Regional Council
BACKGROUND

A major emphasis of the Washington State Growth Management Act (GMA) is the need to coordinate local, regional, and state planning efforts. To advance this coordination, the Puget Sound Regional Council (PSRC) is required to formally certify that regional transit plans, countywide planning policies, and local comprehensive plans within the central Puget Sound region conform to: (1) established regional guidelines and principles, (2) the adopted long-range regional transportation plan, and (3) transportation planning requirements in the Growth Management Act. Within the central Puget Sound region, the multicounty planning policies (MPPs) have been established as the regional guidelines and principles under Revised Code of Washington (RCW) 47.80.026.

Certification of local plans and policies is also a requirement for jurisdictions and agencies that intend to apply for PSRC funding or proceed with any project submitted into the Regional Transportation Improvement Program, regardless of funding source.

Within the central Puget Sound region, local governments and PSRC have worked together to develop an overall process (Adopted Policy and Plan Review Process, Revised September 2003) for reviewing and certifying local, countywide, regional, and transit agency policies and plans. This process also provides an opportunity to coordinate and share information related to local and regional planning. A set of materials, compiled in a Plan Review Manual, provides details on the review and certification process, background, and framework. The manual also provides guidance and checklists for aligning plans and policies with VISION 2040, Transportation 2040, and Growth Management Act requirements.

DISCUSSION

This report summarizes the findings and recommendations regarding the periodic update to the comprehensive plan for the City of Snoqualmie, adopted by the city on December 8, 2014. PSRC last certified the Snoqualmie comprehensive plan in September 2005. PSRC staff reviewed the updated comprehensive plan and coordinated with city staff in the development of this report.

CERTIFICATION RECOMMENDATION

Based on the review of the City of Snoqualmie comprehensive plan, the following action is recommended to the PSRC Growth Management Policy Board, Transportation Policy Board, and Executive Board:

The Puget Sound Regional Council conditionally certifies that the transportation-related provisions in Snoqualmie 2032, the city’s 2014 comprehensive plan update, conform to the Growth Management Act and are consistent with multicounty planning policies and the regional transportation plan.

1 The certification requirement in the Growth Management Act is described in RCW 47.80. The specific requirements for transportation elements in local comprehensive plans are spelled out in RCW 36.70A.070. PSRC’s Interlocal Agreement, Section VII, also provides direction for the review of local comprehensive plans and countywide policies (Resolution A-91-01, amended March 1998). The Council’s Executive Board last updated its process for Policy and Plan Review in September 2003. The process is also described in VISION 2040, Part IV: Implementation.
Conditional status is in place until the City of Snoqualmie amends the comprehensive plan to address inconsistency between the anticipated housing and employment growth included in the plan and the countywide adopted growth targets. This may include amending the comprehensive plan to:

- Adjust the plan’s anticipated population and employment growth, including for the unincorporated area, to more closely align with the adopted countywide targets. It is recognized that the city’s plan for growth will not fully align with the adopted growth targets due to recent and future unavoidable growth from planned developments.
- Expand recognition of the Regional Growth Strategy, including striving to manage growth consistent with the role of designated Small Cities.
- Include policy and actions to further manage growth consistent with the Regional Growth Strategy, including policies related to the timing and development of the unincorporated urban area.
- Include policy and actions that support working with King County to manage the development and annexation of the adjacent unincorporated urban growth areas consistent with the Regional Growth Strategy.

These conditions will be addressed according to the following schedule:

1. Council action to authorize addressing the condition identified in the certification report by May 31, 2016.
2. Submission of a draft amended comprehensive plan and supporting documents that address the condition to PSRC for review and comment in advance of adoption.
3. Once the condition is adequately addressed, submission of the adopted amended comprehensive plan and supporting documents by June 30, 2017, for review and certification by PSRC.

The city acknowledges and understands these conditions.

It is recognized that the city’s comprehensive plan is highly supportive of the goals and policies of VISION 2040 and that the city has already taken a number of steps to work towards implementing VISION 2040. It is also recognized that much of the development that has occurred in Snoqualmie follows the approved planned communities that originated prior to annexation and development was initiated prior to the adoption of VISION 2040. In light of the unavoidable development, the city has done excellent work managing growth. A large portion of the anticipated future growth for the city is in the unincorporated urban area. By working with the county on the timing of development and annexation of the unincorporated urban area, the city may be able to manage the city’s overall rate of growth to better align with the development of local services and the Regional Growth Strategy.

The remainder of this report contains a summary of the PSRC review of the Snoqualmie 2032 comprehensive plan update. Under each heading, the scope of the certification review, as guided by the Plan Review Manual and Local Comprehensive Plan Checklist, is listed in high-level bullets. Discussion in each topic area highlights three areas: 1) Exemplary provisions of the plan, 2) Conditions for Certification, as well as 3) Issues identified through the certification review where future work is needed to more fully address VISION 2040, Transportation 2040, or GMA planning requirements. These are areas where the plan could be strengthened or improved outside of stated conditions.
Part I: Conformity with Growth Management Act Transportation Planning Requirements

Scope of Review
The Growth Management Act (RCW 36.70A.070(6)) includes several requirements related to transportation elements in local comprehensive plans. These requirements are summarized as follows:

- Land use assumptions and forecasts of travel demand that are internally consistent and consistent with growth targets.
- Service and facility needs, including inventories of existing facilities, and level-of-service standards and concurrency provisions that address multiple modes of travel, planned land uses and densities, and state highways.
- Financing and investments, including a multiyear financing plan and reassessment strategy to address potential funding shortfalls.
- Intergovernmental coordination with neighboring cities, counties, and regional and state agencies.
- Demand management, including programs to implement the Commute Trip Reduction Act.
- Pedestrian and bicycle planning, including project funding and capital investments, education, and safety.
- Land uses adjacent to airports, identifying relevant facilities, existing and planned uses, and policies that discourage incompatible uses.

Air quality is largely an interjurisdictional issue in which each jurisdiction's travel behaviors, measured through vehicle emissions, affect the regional airshed. The Washington Administrative Code (WAC) requires local transportation elements and plans to include "policies and provisions that promote the reduction of criteria pollutants" for mobile sources (WAC 173-420-080). When PSRC reviews plans, it also certifies that the comprehensive plans include air quality policies and provisions, including a commitment to meeting the requirements of applicable federal and state air quality legislation.

Discussion: Exemplary Plan Provisions
The city's comprehensive plan effectively addresses many of the transportation planning requirements of the Growth Management Act and includes adequate air quality policies and provisions. Highlights include:

- A Land Use Element that includes population and employment projections, and detailed records of planning areas within the city and the adjacent urban growth area including land uses, capacity, constraints and potential for new development and street connections.
- Goals and policies for a multi-modal transportation system that supports the city's planned land uses, including streets, sidewalks, trails, bicycle facilities, and transit. (8.1)
- A Transportation Element with a detailed inventory of transportation facilities and needs, including various modes, levels of service, traffic volumes, a twenty-year project list, costs and revenues. (Chapter 8)
- Identification of priority sidewalk and bicycle facility improvements as a means to enhance non-motorized transportation options. (Chapter 8)
- Goals and policies that support coordination with the state and county regarding planning for roadway and trail connections and regarding regional transportation plans. (8.2)

Discussion: Conditions for Certification
- The primary condition for certification is discussed under Development Patterns regarding consistency between the growth expectations of the comprehensive plan and the Regional Growth Strategy. Transportation modeling, estimates of demand for new infrastructure, and financing should be reviewed and revised if necessary to be consistent with any changes to the land use element.
DISCUSSION: AREAS FOR FURTHER WORK
The certification review did not identify any additional major areas for improvement of the plan to better align with the Growth Management Act transportation planning requirements.

Part II: Consistency with Regional Plans and Policies

OVERVIEW
This section discusses consistency with the adopted multicounty planning policies (established regional guidelines and principles under RCW 47.80.026) adopted in VISION 2040, and Transportation 2040, the region’s long-range transportation plan. In addition to the MPPs, VISION 2040 contains a Regional Growth Strategy with a preferred distribution of the region’s residential and employment growth, as well as a number of implementation actions for local governments to carry out. Each policy area addressed in VISION 2040 is discussed in turn below.

VISION 2040 CONTEXT STATEMENT
VISION 2040 calls for local plans to include a context statement that describes how the comprehensive plan addresses regional policies and provisions adopted in VISION 2040. The Vision & Policy Plan element of Snoqualmie’s comprehensive plan includes a section which describes the plan’s policy relationship to VISION 2040.

Environment

SCOPE OF REVIEW
VISION 2040 calls for local comprehensive plans to address the following environmental policy topics:

- **Stewardship**, including addressing the natural environment throughout the plan, decisions based on best-available science, and regional environmental initiatives.
- **Earth and habitat**, including open space protection, restoration and protection of native vegetation, and coordination with adjacent jurisdictions.
- **Water quality**, including actions that maintain hydrologic functions and reduce water pollution in ecosystems, watersheds, shorelines, and estuaries.
- **Air quality and climate change**, addressing federal and state laws, reduction of pollutants, Puget Sound Clean Air Agency policies, and reduction of greenhouse gas emissions and adaptation to climate change.

DISCUSSION: EXEMPLARY PLAN PROVISIONS
The city’s comprehensive plan effectively addresses the environmental policy topics in VISION 2040 with strong goals and actionable policies. Highlights include:

- A thorough Environment Element that explains the environmental context of the city and addresses major issues facing the city and region including sustainability, climate change, and the city’s relationship with the Snoqualmie River. (Chapter 6)
- A detailed inventory and mapping of environmentally critical areas, including the floodplain and frequently flooded areas, which significantly affect a large portion of the city.
- Policies that support the city’s greenhouse gas reduction targets, which call for reduction of the community’s 2007 greenhouse gas emission levels 80% by 2050 and development of a Climate Action Plan. Implementation actions called for in plan policies include leading by example with climate-friendly municipal operations, incorporating greenhouse gas assessments in environmental reviews within the city, promoting healthy urban forests to store carbon, cooperating with other jurisdictions to address climate change, and promoting energy-efficient building techniques.
A Snoqualmie Sustainability Strategy that addresses a range of environmental issues, such as flooding, energy efficiency, green infrastructure and green buildings with 77 specific strategies. (Chapter 6)

An inventory of tree canopy coverage (43.7%) and objectives to explore setting a tree canopy target as part of an Urban Forest Strategic planning process. (Chapter 6)

**DISCUSSION: AREAS FOR FURTHER WORK**
The certification review did not identify any major areas for improvement of the plan to better align with regional guidelines and principles on the environment.

**Development Patterns – Including the Regional Growth Strategy**

**SCOPE OF REVIEW**
VISION 2040 calls for local comprehensive plans to address the following development patterns policy topics:

- **Urban areas**, including targets for housing and employment growth, compact communities that support transit and walking, and provisions for redevelopment of underused land.
- **Centers**, including planning for one or more central places as locations for compact, mixed-use development, with policies that prioritize funding to centers to advance development.
- **Unincorporated urban areas**, including policies that advance annexation and orderly transition of governance.
- **Resource lands**, including identification of steps to limit development.
- **Regional design**, addressing local provisions that apply the Transportation 2040 Physical Design Guidelines, energy efficient building, historic preservation, and enhanced sense of community.
- **Health and active living**, addressing healthy environment, physical activity and well-being, and safety.

**DISCUSSION: EXEMPLARY PLAN PROVISIONS**
The city’s comprehensive plan effectively addresses the majority of development patterns policies in VISION 2040. Highlights include:

- A clear and compelling vision for a sustainable and prosperous small city that benefits its citizens and the region, that is comprised of a collection of neighborhoods, with unique character, and where there is a focus on the long term.
- Goals and policies to support thriving community and neighborhood centers, including a focus on developing the city’s downtown area into a vibrant, walkable, and successful retail "main street" for the city using, among other things, the National Main Street Program’s “4-Point Approach” for retail district revitalization.
- A detailed and thorough analysis and documentation of locations and types of planned residential and commercial growth, including the relationship of planned growth to adopted targets and developable land capacity.
- A clear framework for evaluating and approving annexations within the city’s potential annexation area in order to ensure an orderly transition of unincorporated areas to city governance. Goals and policies support appropriate sub-area planning of areas prior to annexation to effectively manage growth and development within the urban growth area. (Objective 7.8)

**DISCUSSION: CONDITIONS FOR CERTIFICATION**
The city should address the following provisions of the Growth Management Act and VISION 2040 as stated in the conditional certification recommendation:

- As stated under the Certification Recommendation, it is recognized that the city’s plan for growth cannot fully align with the adopted growth targets due to recent and future unavoidable growth from planned
developments. However, the comprehensive plan’s anticipated population and employment growth should still be adjusted to more closely align with the adopted countywide targets. Land use element tables 7.6/7.7 and assumptions project household and employment growth significantly in excess of the adopted growth targets for the city and potential annexation areas. Discussion in the land use element explains that commercial and housing development in the years since King County’s growth targets were adopted, combined with in-progress development agreements, and growth in the unincorporated growth areas will lead to targets being exceeded by about a projected 1,600 housing units and 2,400 jobs during the planning period.

<table>
<thead>
<tr>
<th></th>
<th>Housing Units</th>
<th>Jobs</th>
</tr>
</thead>
<tbody>
<tr>
<td>2006-31 Countywide target</td>
<td>1,615</td>
<td>1,050</td>
</tr>
<tr>
<td>Net development (2006-2012)</td>
<td>1,078</td>
<td>737</td>
</tr>
<tr>
<td>Remaining target</td>
<td>537</td>
<td>313</td>
</tr>
<tr>
<td>City’s planned 2012-32 development</td>
<td>2,126</td>
<td>2,733</td>
</tr>
<tr>
<td>Planned growth beyond target</td>
<td>1,589</td>
<td>2,420</td>
</tr>
</tbody>
</table>

Growth targets represent agreement among cities and the county on how growth will be accommodated within each county, consistent with the VISION 2040 regional growth strategy (MPP-DP-3, King County CPP/DP-12). Land use assumptions in comprehensive plans, as a reflection of the adopted growth target, are similarly bound by consistency requirements given their effect on the timing, location, and financing of public services and facilities (e.g. transportation, wastewater).

Recognizing growth that has already occurred and that is expected under development agreements, it is inevitable that growth in the city will exceed the countywide adopted targets. However, it may still be possible for the city to work towards a rate of growth that is more aligned with the Regional Growth Strategy than the assumptions shown above.

The Snoqualmie comprehensive plan already supports a number of good planning strategies to manage growth and development. One opportunity to further explore is to work with King County to identify opportunities to jointly manage the timing of development and annexation of the unincorporated urban area adjacent to the city. A significant portion of the city’s future growth is anticipated to occur in the planned annexation area — about 700 housing units and more than 1,000 jobs. By working with King County, the city may be able to manage the timing of development and annexation of the area in a manner that better allows for development of local and regional services and is more aligned with the rate of growth anticipated by the Regional Growth Strategy.

The city should review and amend the planned growth numbers included in the plan, in light of this issue. Addressing the development expected in the unincorporated urban area separately from city growth will help to clarify the city-specific growth expectations. Additionally, the employment assumptions may be overly aggressive considering that much of the commercial development assumed is uncertain.

The land use and economic development elements of the plan call for designation of sufficient land in order to capture a two-thirds share of local residents’ spending on goods and services (land use policy 3.2.2). The city is encouraged to implement this city policy by identifying sufficient land for retail and service uses that are consistent with the regional growth strategy and that do not rely on an expansion of the urban growth area (MPP-DP-2,4,16).
Housing

Scope of Review
VISION 2040 calls for local comprehensive plans to address the following housing policy topics:

- Increased housing production opportunities, including diverse types and styles for all income levels and demographic groups.
- Affordable housing needs, including an assessment of existing and future housing needs based on regional and local factors, including household income, demographics, special needs populations, and adequacy of existing housing stocks.
- Regional housing objectives in VISION 2040, including promotion of housing diversity and affordability, jobs-housing balance, housing in centers, and flexible standards and innovative techniques.

Discussion: Exemplary Plan Provisions
The city's comprehensive plan effectively addresses the housing provisions in VISION 2040. Highlights include:

☑ Goals and policies that support housing for a wide range of economic levels, age groups and household types, including support for accessory dwelling units, small lot housing, and cottage housing. (4.2)
☑ A detailed housing element that provides an inventory of housing types, affordability, capacity and specific information about the impact of flood areas on housing.
☑ Support for meeting the countywide defined need for low and moderate income households as part of the overall household inventory. (4.3.2)
☑ Policies that allow for emergency, transitional and permanent special needs housing. (4.2.4)
☑ Policies that support assisting homeowners within the floodplain with elevating their homes. (4.1.2)

Discussion: Areas for Further Work
The certification review did not identify any major areas for improvement of the plan to better align with regional guidelines and principles on housing.

Economy

Scope of Review
VISION 2040 calls for local comprehensive plans to address the following economic development policy topics:

- Include an economic development element that addresses business, people, and places.
- Retention and recruitment efforts that support family wage jobs, industry clusters that export goods and services, and small businesses that are locally owned.
- Equitable benefits and impacts, including provisions and programs that promote economic vitality in distressed areas or areas with disadvantaged populations.
- Adequate housing growth in centers through collaboration with the private sector and through the provision of infrastructure.

Discussion: Exemplary Plan Provisions
The city's comprehensive plan effectively addresses many of the economic provisions of VISION 2040. Highlights include:

☑ An economic development element that articulates the city's strategy for maintaining and growing a vibrant local economy, including an emphasis on increasing tourism, supporting business retention and recruitment, and focusing on targeted industry clusters.
**Discussion: Areas for Further Work**

The certification review did not identify any major areas for improvement of the plan to better align with regional guidelines and principles on economic development.

**Transportation**

**Scope of Review**

VISION 2040 and Transportation 2040 call for local comprehensive plans to address the following transportation policy topics:

- **Maintenance, management, and safety**, including clean transportation with reductions in pollution and greenhouse gas emissions, environmental factors, health and safety, stable and predictable funding sources, system and demand management strategies, and security and emergency response.

- **Support for the Regional Growth Strategy**, including system improvements that align with planned growth, prioritized investments that support compact development in centers, joint- and mixed-use development, complete streets and improvements to promote biking and walking, and context-sensitive design.

- **Improved transportation options and mobility**, including alternatives to driving alone, facilities and services for special needs transportation, avoidance of new or expanded facilities in rural areas, and financing methods.

- **Linking land use and transportation**, including integrating Transportation 2040 physical design guidelines in planning for centers and transit station areas, and land development tools that promote transportation alternatives.

**Discussion: Exemplary Plan Provisions**

The city’s comprehensive plan effectively addresses the major transportation emphases in VISION 2040 and Transportation 2040, including maintenance, management, and safety; support for the Regional Growth Strategy; and providing greater options and mobility. In addition to those listed previously, highlights include:

- **Transportation Policy 1.17** provides for protection of the transportation system against disaster, development of prevention and recovery strategies, and planning for coordinated responses through use of transportation-related preparedness, prevention, mitigation, response, and recovery strategies and procedures.

**Discussion: Conditions for Certification**

- The primary condition for certification is discussed under Development Patterns regarding consistency between the growth expectations of the comprehensive plan and the Regional Growth Strategy. Transportation modeling, estimates of demand for new infrastructure, and financing should be reviewed and revised if necessary to be consistent with any changes to the land use element.

**Discussion: Areas for Further Work**

The city should address the following comments through future amendments to the comprehensive plan, subarea plans, or functional plans:

- The region’s multiconty planning policies (MPP-DP-54, 55) call for addressing transportation concurrency on the movement of people and goods instead of only on the movement of vehicles, both in assessment and mitigation. It would be appropriate to expand the transportation element’s multi-modal level of service beyond the downtown.

- The city should consider developing a transit street classification as a way to guide investments in transit-supportive infrastructure, including street design standards that support transit. See the recently-developed [http://www.psrc.org/transportation/transit/toolkit/](http://www.psrc.org/transportation/transit/toolkit/) for more information and examples of provisions that Snoqualmie could add to the plan to support transit.
Public Services

SCOPE OF REVIEW

VISION 2040 calls for local comprehensive plans to address the following public services policy topics:

- Promote more efficient use of existing services, such as waste management, energy, and water supply, through conservation – including demand management programs and strategies.
- Promote renewable energy and alternative energy sources.
- Plan for long-term water needs, including conservation, reclamation and reuse.

DISCUSSION: EXEMPLARY PLAN PROVISIONS

The city's comprehensive plan effectively addresses the public services provisions of VISION 2040. Highlights include:

☑ Strategies to support city-wide recycling and composting, including rate incentives, requirements for collection facilities, consideration of demolition waste recycling, and coordination with other agencies.
☑ Identification of low impact development strategies to reduce the impact of stormwater, including reducing street pavement, use of pervious surfaces, use of bio-retention catchment, limiting clearing, and other alternative methods of managing stormwater.

DISCUSSION: AREAS FOR FURTHER WORK

The certification review did not identify any major areas related to public services for improvement.

Conclusion

PSRC staff thank the jurisdiction for working through the plan review process. PSRC is available to provide assistance for future plan updates and additional planning resources can also be found at http://www.psrc.org/growth/planreview/resources/. If the city has questions or needs additional information, please contact Yorik Stevens-Wajda at 206-464-6179 or ystevens-wajda@psrc.org.
Mark Hofman

Exhibit F

From: Paul Inghram <Pingram@psrc.org>
Sent: Friday, January 27, 2017 3:34 PM
To: 'Brian Parry'; Richard Hart (rhart@covingtow.gov); slyons@covingtow.gov; Mark Hofman; Gina Estep; Jason Sullivan (SullivanJ@c.bonneynlake.wa.us); Kester, Jennifer; Lindsey Sehmel; tim.woolell@carnationw.gov
Cc: Charlie Howard; Michael Hubner
Subject: Exec Board approval of alternative path for certification
Attachments: PSRC Exec Board Approved action item 10.docx

City Representatives,

As many of you know, the PSRC Executive Board approved a new path for full certification by the six small cities that were conditionally certified related to growth targets. I want to thank you for working with us to develop this option. All of you have done excellent planning work and we appreciate your efforts to implement VISION 2040. And I appreciate your patience in developing an option that can work for everyone.

Elements of this new option were recommended by the Growth Management Policy Board earlier this month. Sound Cities Association, working closely with Snoqualmie, suggested some precise edits to the GMPB version. The Executive Board made one additional edit in its final approval. The final version is attached. I will work with Brian Parry at SCA to schedule a conference call for next week for a chance to check in and ask any follow up questions about the option.

Cities retain the ability to make comprehensive plan changes and submit them for full certification as originally anticipated in the conditional certifications. With this new path, cities now have the option to adopt a resolution that addresses the issue. If you are working on plan changes, but think you may need more time, we can also work with the board to approve a time extension.

For either option, we ask that you connect with us as you prepare a draft, and then submit your adopted plan or resolution after council action. GMPB will review the adopted plan or resolution and make a recommendation regarding full certification to the Executive Board. We are working on a sample resolution that you do not need to use, but which might be helpful for your process.

If there is anything we can to do help, please let me know.

Thanks and I look forward to talking with you sometime next week. Have a great weekend!

Paul

Paul Inghram, AICP | Growth Management Program Manager | Puget Sound Regional Council
1011 Western Ave Ste 500 | Seattle, WA 98104
206-464-7549 office | 206-790-0182 mobile | pingram@psrc.org

Puget Sound Regional Council
Executive Board – January 26, 2017
Agenda Item #10

Under this option, the cities would be asked to:

- Acknowledge that the planned housing and employment growth anticipated in the small city’s adopted comprehensive plan is greater than adopted growth targets for the city, and acknowledge the importance of managing that growth and mitigating its impacts, including on surrounding communities, rural and resource lands, and the regional transportation system.

- Continue to work collaboratively with regional and countywide planning organizations on growth allocations during the next and future and target updates and commit to planning for growth in future plan updates consistent with those collaboratively-set and adopted-target updates.

- Identify and continue strategies cities are using to manage and mitigate the impacts of growth.

- Reinforce the city’s commitment to managing its growth within current city and UGA boundaries, while minimizing impacts on surrounding rural and resource lands; commit to using the adopted countywide criteria for evaluating any requested UGA modifications.

- Commit to prioritize consistency with the Regional Growth Strategy when considering future land use and zoning changes and capital facilities investments.
BACKGROUND
A major emphasis of the Washington State Growth Management Act (GMA) is the need to coordinate local, regional, and state planning efforts. To advance this coordination, the Puget Sound Regional Council (PSRC) is required to formally certify that regional transit plans, countywide planning policies, and local comprehensive plans within the central Puget Sound region conform to: (1) established regional guidelines and principles, (2) the adopted long-range regional transportation plan, and (3) transportation planning requirements in the Growth Management Act. Within the central Puget Sound region, the multicounty planning policies (MPPs) have been established as the regional guidelines and principles under Revised Code of Washington (RCW) 47.80.026. Certification of local plans and policies is also a requirement for jurisdictions and agencies that intend to apply for PSRC funding or proceed with any project submitted into the Regional Transportation Improvement Program, regardless of funding source.

Within the central Puget Sound region, local governments and PSRC have worked together to develop an overall process (Adopted Policy and Plan Review Process, Revised September 2003) for reviewing and certifying local, countywide, regional, and transit agency policies and plans. This process also provides an opportunity to coordinate and share information related to local and regional planning. A set of materials, compiled in a Plan Review Manual, provides details on the review and certification process, background, and framework. The manual also provides guidance and checklists for aligning plans and policies with VISION 2040, Transportation 2040, and Growth Management Act requirements.

DISCUSSION
This report summarizes the findings and recommendations regarding the periodic update to the comprehensive plan for the City of Snoqualmie, adopted by the city on December 8, 2014. PSRC last certified the Snoqualmie comprehensive plan in September 2005. PSRC staff reviewed the updated comprehensive plan and coordinated with city staff in the development of this report.

CERTIFICATION RECOMMENDATION
Based on the review of the City of Snoqualmie comprehensive plan, the following action is recommended to the PSRC Growth Management Policy Board, Transportation Policy Board, and Executive Board:

The Puget Sound Regional Council conditionally certifies that the transportation-related provisions in Snoqualmie 2032, the city’s 2014 comprehensive plan update, conform to the Growth Management Act and are consistent with multicounty planning policies and the regional transportation plan.

1 The certification requirement in the Growth Management Act is described in RCW 47.80. The specific requirements for transportation elements in local comprehensive plans are spelled out in RCW 36.70A.070. PSRC’s Interlocal Agreement, Section VII, also provides direction for the review of local comprehensive plans and countywide policies (Resolution A-91-01, amended March 1998). The Council’s Executive Board last updated its process for Policy and Plan Review in September 2003. The process is also described in VISION 2040, Part IV: Implementation.
Conditional status is in place until the City of Snoqualmie amends the comprehensive plan to address inconsistency between the anticipated housing and employment growth included in the plan and the countywide adopted growth targets. This may include amending the comprehensive plan to:

- Adjust the plan’s anticipated population and employment growth, including for the unincorporated area, to more closely align with the adopted countywide targets. It is recognized that the city’s plan for growth will not fully align with the adopted growth targets due to recent and future unavoidable growth from planned developments.

- Expand recognition of the Regional Growth Strategy, including striving to manage growth consistent with the role of designated Small Cities.

- Include policy and actions to further manage growth consistent with the Regional Growth Strategy, including policies related to the timing and development of the unincorporated urban area.

- Include policy and actions that support working with King County to manage the development and annexation of the adjacent unincorporated urban growth areas consistent with the Regional Growth Strategy.

These conditions will be addressed according to the following schedule:

1. Council action to authorize addressing the condition identified in the certification report by May 31, 2016.

2. Submission of a draft amended comprehensive plan and supporting documents that address the condition to PSRC for review and comment in advance of adoption.

3. Once the condition is adequately addressed, submission of the adopted amended comprehensive plan and supporting documents by June 30, 2017, for review and certification by PSRC.

The city acknowledges and understands these conditions.

It is recognized that the city’s comprehensive plan is highly supportive of the goals and policies of VISION 2040 and that the city has already taken a number of steps to work towards implementing VISION 2040. It is also recognized that much of the development that has occurred in Snoqualmie follows the approved planned communities that originated prior to annexation and development was initiated prior to the adoption of VISION 2040. In light of the unavoidable development, the city has done excellent work managing growth. A large portion of the anticipated future growth for the city is in the unincorporated urban area. By working with the county on the timing of development and annexation of the unincorporated urban area, the city may be able to manage the city’s overall rate of growth to better align with the development of local services and the Regional Growth Strategy.

The remainder of this report contains a summary of the PSRC review of the Snoqualmie 2032 comprehensive plan update. Under each heading, the scope of the certification review, as guided by the Plan Review Manual and Local Comprehensive Plan Checklist, is listed in high-level bullets. Discussion in each topic area highlights three areas: 1) Exemplary provisions of the plan, 2) Conditions for Certification, as well as 3) Issues identified through the certification review where future work is needed to more fully address VISION 2040, Transportation 2040, or GMA planning requirements. These are areas where the plan could be strengthened or improved outside of stated conditions.
Part I: Conformity with Growth Management Act Transportation Planning Requirements

Scope of Review
The Growth Management Act (RCW 36.70A.070(6)) includes several requirements related to transportation elements in local comprehensive plans. These requirements are summarized as follows:

1. **Land use assumptions and forecasts of travel demand** that are internally consistent and consistent with growth targets.
2. **Service and facility needs**, including inventories of existing facilities, and level-of-service standards and concurrency provisions that address multiple modes of travel, planned land uses and densities, and state highways.
3. **Financing and investments**, including a multiyear financing plan and reassessment strategy to address potential funding shortfalls.
4. **Intergovernmental coordination** with neighboring cities, counties, and regional and state agencies.
5. **Demand management**, including programs to implement the Commute Trip Reduction Act.
6. **Pedestrian and bicycle planning**, including project funding and capital investments, education, and safety.
7. **Land uses adjacent to airports**, identifying relevant facilities, existing and planned uses, and policies that discourage incompatible uses.

Air quality is largely an interjurisdictional issue in which each jurisdiction's travel behaviors, measured through vehicle emissions, affect the regional airshed. The Washington Administrative Code (WAC) requires local transportation elements and plans to include "policies and provisions that promote the reduction of criteria pollutants" for mobile sources (WAC 173-420-080). When PSRC reviews plans, it also certifies that the comprehensive plans include air quality policies and provisions, including a commitment to meeting the requirements of applicable federal and state air quality legislation.

Discussion: Exemplary Plan Provisions
The city’s comprehensive plan effectively addresses many of the transportation planning requirements of the Growth Management Act and includes adequate air quality policies and provisions. Highlights include:

- ✔ A Land Use Element that includes population and employment projections, and detailed records of planning areas within the city and the adjacent urban growth area including land uses, capacity, constraints and potential for new development and street connections.
- ✔ Goals and policies for a multi-modal transportation system that supports the city’s planned land uses, including streets, sidewalks, trails, bicycle facilities, and transit. (8.1)
- ✔ A Transportation Element with a detailed inventory of transportation facilities and needs, including various modes, levels of service, traffic volumes, a twenty-year project list, costs and revenues. (Chapter 8)
- ✔ Identification of priority sidewalk and bicycle facility improvements as a means to enhance non-motorized transportation options. (Chapter 8)
- ✔ Goals and policies that support coordination with the state and county regarding planning for roadway and trail connections and regarding regional transportation plans. (8.2)

Discussion: Conditions for Certification
- □ The primary condition for certification is discussed under Development Patterns regarding consistency between the growth expectations of the comprehensive plan and the Regional Growth Strategy. Transportation modeling, estimates of demand for new infrastructure, and financing should be reviewed and revised if necessary to be consistent with any changes to the land use element.
DISCUSSION: AREAS FOR FURTHER WORK
The certification review did not identify any additional major areas for improvement of the plan to better align with the Growth Management Act transportation planning requirements.

Part II: Consistency with Regional Plans and Policies

OVERVIEW
This section discusses consistency with the adopted multicounty planning policies (established regional guidelines and principles under RCW 47.80.026) adopted in VISION 2040, and Transportation 2040, the region’s long-range transportation plan. In addition to the MPPs, VISION 2040 contains a Regional Growth Strategy with a preferred distribution of the region’s residential and employment growth, as well as a number of implementation actions for local governments to carry out. Each policy area addressed in VISION 2040 is discussed in turn below.

VISION 2040 CONTEXT STATEMENT
VISION 2040 calls for local plans to include a context statement that describes how the comprehensive plan addresses regional policies and provisions adopted in VISION 2040. The Vision & Policy Plan element of Snoqualmie’s comprehensive plan includes a section which describes the plan’s policy relationship to VISION 2040.

Environment

SCOPE OF REVIEW
VISION 2040 calls for local comprehensive plans to address the following environmental policy topics:

- **Stewardship**, including addressing the natural environment throughout the plan, decisions based on best-available science, and regional environmental initiatives.
- **Earth and habitat**, including open space protection, restoration and protection of native vegetation, and coordination with adjacent jurisdictions.
- **Water quality**, including actions that maintain hydrologic functions and reduce water pollution in ecosystems, watersheds, shorelines, and estuaries.
- **Air quality and climate change**, addressing federal and state laws, reduction of pollutants, Puget Sound Clean Air Agency policies, and reduction of greenhouse gas emissions and adaptation to climate change.

DISCUSSION: EXEMPLARY PLAN PROVISIONS
The city’s comprehensive plan effectively addresses the environmental policy topics in VISION 2040 with strong goals and actionable policies. Highlights include:

- A thorough Environment Element that explains the environmental context of the city and addresses major issues facing the city and region including sustainability, climate change, and the city’s relationship with the Snoqualmie River. (Chapter 6)
- A detailed inventory and mapping of environmentally critical areas, including the floodplain and frequently flooded areas, which significantly affect a large portion of the city.
- Policies that support the city’s greenhouse gas reduction targets, which call for reduction of the community’s 2007 greenhouse gas emission levels 80% by 2050 and development of a Climate Action Plan. Implementation actions called for in plan policies include leading by example with climate-friendly municipal operations, incorporating greenhouse gas assessments in environmental reviews within the city, promoting healthy urban forests to store carbon, cooperating with other jurisdictions to address climate change, and promoting energy-efficient building techniques.
A Snoqualmie Sustainability Strategy that addresses a range of environmental issues, such as flooding, energy efficiency, green infrastructure and green buildings with 77 specific strategies. (Chapter 6)

An inventory of tree canopy coverage (43.7%) and objectives to explore setting a tree canopy target as part of an Urban Forest Strategic planning process. (Chapter 6)

**DISCUSSION: AREAS FOR FURTHER WORK**

The certification review did not identify any major areas for improvement of the plan to better align with regional guidelines and principles on the environment.

**Development Patterns – Including the Regional Growth Strategy**

<table>
<thead>
<tr>
<th>SCOPE OF REVIEW</th>
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<tbody>
<tr>
<td>VISION 2040 calls for local comprehensive plans to address the following development patterns policy topics:</td>
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<tr>
<td><strong>Urban areas</strong>, including targets for housing and employment growth, compact communities that support transit and walking, and provisions for redevelopment of underused land.</td>
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<td><strong>Centers</strong>, including planning for one or more central places as locations for compact, mixed-use development, with policies that prioritize funding to centers to advance development.</td>
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<tr>
<td><strong>Unincorporated urban areas</strong>, including policies that advance annexation and orderly transition of governance.</td>
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<td><strong>Resource lands</strong>, including identification of steps to limit development.</td>
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<tr>
<td><strong>Regional design</strong>, addressing local provisions that apply the Transportation 2040 Physical Design Guidelines, energy efficient building, historic preservation, and enhanced sense of community.</td>
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<tr>
<td><strong>Health and active living</strong>, addressing healthy environment, physical activity and well-being, and safety.</td>
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**DISCUSSION: EXEMPLARY PLAN PROVISIONS**

The city’s comprehensive plan effectively addresses the majority of development patterns policies in VISION 2040. Highlights include:

✓ A clear and compelling vision for a sustainable and prosperous small city that benefits its citizens and the region, that is comprised of a collection of neighborhoods, with unique character, and where there is a focus on the long term.

✓ Goals and policies to support thriving community and neighborhood centers, including a focus on developing the city’s downtown area into a vibrant, walkable, and successful retail “main street” for the city using, among other things, the National Main Street Program’s “4-Point Approach” for retail district revitalization.

✓ A detailed and thorough analysis and documentation of locations and types of planned residential and commercial growth, including the relationship of planned growth to adopted targets and developable land capacity.

✓ A clear framework for evaluating and approving annexations within the city’s potential annexation area in order to ensure an orderly transition of unincorporated areas to city governance. Goals and policies support appropriate sub-area planning of areas prior to annexation to effectively manage growth and development within the urban growth area. (Objective 7.8)

**DISCUSSION: CONDITIONS FOR CERTIFICATION**

The city should address the following provisions of the Growth Management Act and VISION 2040 as stated in the conditional certification recommendation:

☐ As stated under the Certification Recommendation, it is recognized that the city’s plan for growth cannot fully align with the adopted growth targets due to recent and future unavoidable growth from planned...
developments. However, the comprehensive plan’s anticipated population and employment growth should still be adjusted to more closely align with the adopted countywide targets. Land use element tables 7.6/7.7 and assumptions project household and employment growth significantly in excess of the adopted growth targets for the city and potential annexation areas. Discussion in the land use element explains that commercial and housing development in the years since King County’s growth targets were adopted, combined with in-progress development agreements, and growth in the unincorporated growth areas will lead to targets being exceeded by about a projected 1,600 housing units and 2,400 jobs during the planning period.

<table>
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<tr>
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<th>Housing Units</th>
<th>Jobs</th>
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<tbody>
<tr>
<td>2006-31 Countywide target</td>
<td>1,615</td>
<td>1,050</td>
</tr>
<tr>
<td>Net development (2006-2012)</td>
<td>1,078</td>
<td>737</td>
</tr>
<tr>
<td>Remaining target</td>
<td>537</td>
<td>313</td>
</tr>
<tr>
<td>City’s planned 2012-32 development</td>
<td>2,126</td>
<td>2,733</td>
</tr>
<tr>
<td>Planned growth beyond target</td>
<td>1,589</td>
<td>2,420</td>
</tr>
</tbody>
</table>

Growth targets represent agreement among cities and the county on how growth will be accommodated within each county, consistent with the VISION 2040 regional growth strategy (MPP-DP-3, King County CPP DP-12). Land use assumptions in comprehensive plans, as a reflection of the adopted growth target, are similarly bound by consistency requirements given their effect on the timing, location, and financing of public services and facilities (e.g. transportation, wastewater).

Recognizing growth that has already occurred and that is expected under development agreements, it is inevitable that growth in the city will exceed the countywide adopted targets. However, it may still be possible for the city to work towards a rate of growth that is more aligned with the Regional Growth Strategy than the assumptions shown above.

The Snoqualmie comprehensive plan already supports a number of good planning strategies to manage growth and development. One opportunity to further explore is to work with King County to identify opportunities to jointly manage the timing of development and annexation of the unincorporated urban area adjacent to the city. A significant portion of the city’s future growth is anticipated to occur in the planned annexation area – about 700 housing units and more than 1,000 jobs. By working with King County, the city may be able to manage the timing of development and annexation of the area in a manner that better allows for development of local and regional services and is more aligned with the rate of growth anticipated by the Regional Growth Strategy.

The city should review and amend the planned growth numbers included in the plan, in light of this issue. Addressing the development expected in the unincorporated urban area separately from city growth will help to clarify the city-specific growth expectations. Additionally, the employment assumptions may be overly aggressive considering that much of the commercial development assumed is uncertain.

The land use and economic development elements of the plan call for designation of sufficient land in order to capture a two-thirds share of local residents’ spending on goods and services (land use policy 3.2.2). The city is encouraged to implement this city policy by identifying sufficient land for retail and service uses that are consistent with the regional growth strategy and that do not rely on an expansion of the urban growth area (MPP-DP-2,4,16).
Housing

Scope of Review
VISION 2040 calls for local comprehensive plans to address the following housing policy topics:

- **Increased housing production opportunities**, including diverse types and styles for all income levels and demographic groups.
- **Affordable housing needs**, including an assessment of existing and future housing needs based on regional and local factors, including household income, demographics, special needs populations, and adequacy of existing housing stocks.
- **Regional housing objectives** in VISION 2040, including promotion of housing diversity and affordability, jobs-housing balance, housing in centers, and flexible standards and innovative techniques.

Discussion: Exemplary Plan Provisions
The city’s comprehensive plan effectively addresses the housing provisions in VISION 2040. Highlights include:

- Goals and policies that support housing for a wide range of economic levels, age groups and household types, including support for accessory dwelling units, small lot housing, and cottage housing. (4.2)
- A detailed housing element that provides an inventory of housing types, affordability, capacity and specific information about the impact of flood areas on housing.
- Support for meeting the countywide defined need for low and moderate income households as part of the overall household inventory. (4.3.2)
- Policies that allow for emergency, transitional and permanent special needs housing. (4.2.4)
- Policies that support assisting homeowners within the floodplain with elevating their homes. (4.1.2)

Discussion: Areas for Further Work
The certification review did not identify any major areas for improvement of the plan to better align with regional guidelines and principles on housing.

Economy

Scope of Review
VISION 2040 calls for local comprehensive plans to address the following economic development policy topics:

- Include an **economic development element** that addresses business, people, and places.
- **Retention and recruitment efforts** that support family wage jobs, industry clusters that export goods and services, and small businesses that are locally owned.
- **Equitable benefits and impacts**, including provisions and programs that promote economic vitality in distressed areas or areas with disadvantaged populations.
- **Adequate housing growth in centers** through collaboration with the private sector and through the provision of infrastructure.

Discussion: Exemplary Plan Provisions
The city’s comprehensive plan effectively addresses many of the economic provisions of VISION 2040. Highlights include:

- An economic development element that articulates the city’s strategy for maintaining and growing a vibrant local economy, including an emphasis on increasing tourism, supporting business retention and recruitment, and focusing on targeted industry clusters.
DISCUSSION: AREAS FOR FURTHER WORK
The certification review did not identify any major areas for improvement of the plan to better align with regional guidelines and principles on economic development.

Transportation

SCOPE OF REVIEW
VISION 2040 and Transportation 2040 call for local comprehensive plans to address the following transportation policy topics:

- **Maintenance, management, and safety**, including clean transportation with reductions in pollution and greenhouse gas emissions, environmental factors, health and safety, stable and predictable funding sources, system and demand management strategies, and security and emergency response.

- **Support for the Regional Growth Strategy**, including system improvements that align with planned growth, prioritized investments that support compact development in centers, joint- and mixed-use development, complete streets and improvements to promote biking and walking, and context-sensitive design.

- **Improved transportation options and mobility**, including alternatives to driving alone, facilities and services for special needs transportation, avoidance of new or expanded facilities in rural areas, and financing methods.

- **Linking land use and transportation**, including integrating Transportation 2040 physical design guidelines in planning for centers and transit station areas, and land development tools that promote transportation alternatives.

DISCUSSION: EXEMPLARY PLAN PROVISIONS
The city’s comprehensive plan effectively addresses the major transportation emphases in VISION 2040 and Transportation 2040, including maintenance, management, and safety; support for the Regional Growth Strategy; and providing greater options and mobility. In addition to those listed previously, highlights include:

- **Transportation Policy 1.17** provides for protection of the transportation system against disaster, development of prevention and recovery strategies, and planning for coordinated responses through use of transportation-related preparedness, prevention, mitigation, response, and recovery strategies and procedures.

DISCUSSION: CONDITIONS FOR CERTIFICATION

- The primary condition for certification is discussed under Development Patterns regarding consistency between the growth expectations of the comprehensive plan and the Regional Growth Strategy. Transportation modeling, estimates of demand for new infrastructure, and financing should be reviewed and revised if necessary to be consistent with any changes to the land use element.

DISCUSSION: AREAS FOR FURTHER WORK
The city should address the following comments through future amendments to the comprehensive plan, subarea plans, or functional plans:

- The region’s multicounty planning policies (MPP-DP-54, 55) call for addressing transportation concurrency on the movement of people and goods instead of only on the movement of vehicles, both in assessment and mitigation. It would be appropriate to expand the transportation element’s multi-modal level of service beyond the downtown.

- The city should consider developing a transit street classification as a way to guide investments in transit-supportive infrastructure, including street design standards that support transit. See the recently-developed [http://www.psrc.org/transportation/transit/toolkit/](http://www.psrc.org/transportation/transit/toolkit/) for more information and examples of provisions that Snoqualmie could add to the plan to support transit.
Public Services

Scope of Review
VISION 2040 calls for local comprehensive plans to address the following public services policy topics:

- **Promote more efficient use of existing services**, such as waste management, energy, and water supply, through conservation – including demand management programs and strategies.
- **Promote renewable energy and alternative energy sources.**
- **Plan for long-term water needs**, including conservation, reclamation and reuse.

Discussion: Exemplary Plan Provisions
The city’s comprehensive plan effectively addresses the public services provisions of VISION 2040. Highlights include:

- Strategies to support city-wide recycling and composting, including rate incentives, requirements for collection facilities, consideration of demolition waste recycling, and coordination with other agencies.
- Identification of low impact development strategies to reduce the impact of stormwater, including reducing street pavement, use of pervious surfaces, use of bio-retention catchment, limiting clearing, and other alternative methods of managing stormwater.

Discussion: Areas for Further Work
The certification review did not identify any major areas related to public services for improvement.

Conclusion
PSRC staff thank the jurisdiction for working through the plan review process. PSRC is available to provide assistance for future plan updates and additional planning resources can also be found at [http://www.psrc.org/growth/planreview/resources/](http://www.psrc.org/growth/planreview/resources/). If the city has questions or needs additional information, please contact Yorik Stevens-Wajda at 206-464-6179 or ystevens-wajda@psrc.org.