



Puget Sound Regional Council

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Ashley Wragge, Planning Technician
City of Snoqualmie
38624 SE River St
Snoqualmie, WA 98065

Subject: PSRC Comments on Snoqualmie Draft Housing and Transportation Policies

Dear Ms. Wragge,

Thank you for providing an opportunity for the Puget Sound Regional Council (PSRC) to review a draft of the City of Snoqualmie's housing and transportation element goals and policies. We appreciate all the work of the city developing these drafts and the chance to review goals and policies while they are in draft form. This timely collaboration provides an opportunity to review key plan elements for the 2024 comprehensive plan.

The transportation and housing goals and policies advance many regional goals in VISION 2050 and requirements under the Growth Management Act. We suggest the city consider the following comments as further work is completed for the transportation and housing elements to align with [VISION 2050](#) and the Growth Management Act:

- The city should review the housing goals and policies to ensure they expressly address new state requirements under HB 1220. Specifically, those key policy areas from 1220 that may need to be further addressed include:
 - Removing barriers to affordable housing
 - Addressing racially-disparate impacts, displacement, and exclusion
 - Providing sufficient capacity to address housing needs at all income levels
 - Development of middle density housing types
- Please also consider revising some existing policies to better reflect updated state law and regional policy:
 - Policy1 – consider updating “a wide range” of economic levels to “all” economic levels or segments
 - Policy 2a – consider updating the language to better match state law to plan for and accommodate the jurisdiction’s allocated share of future housing needs. Housing needs include moderate-, low-, very low- and extremely low-income households as well as emergency housing, emergency shelters, and permanent supportive housing.

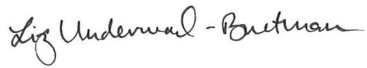
- As the city completes the housing element, it will need to include supporting background information. The Racial Equity and Displacement Analysis, Regional Housing Needs Assessment, and Snoqualmie Housing Strategy Plan provide important data and cover many components that will be required in the housing element. There are some areas these documents don't fully address that should be elaborated in the housing element. These areas include:
 - Documenting existing and projected housing need as adopted through the King County countywide process.
 - Documenting land use capacity to address housing need for all economic segments. Commerce provides [comprehensive guidance](#) on identifying zones to accommodate each income segment. The city's housing needs assessment discusses that the city does not currently have the capacity to accommodate the full housing target. The city should continue to review zoned densities to accommodate the growth targets within its current boundaries and engage with the county. PSRC staff are available to participate in those discussions as needed. PSRC recently published additional guidance on [Planning for Housing Needs & Growth Targets](#).
 - The Housing Strategy Plan includes several specific and actionable recommendations but does not describe the process undertaken to consider barriers to affordable housing and evaluate existing programs. Commerce's [Adequate Provisions](#) checklist is a helpful guide to document what policies, programs, and regulations may serve as barriers to affordable housing.
 - The Racial Equity and Displacement Analysis includes limited information of what historical documents were reviewed to understand the local history and context. Several resources may provide additional information on racially-disparate impacts and exclusion in housing, including King County's [Resources for Documenting the Local History of Racially Exclusive and Discriminatory Land Use and Housing Practices](#), PSRC's [Legacy of Structural Racism](#), and Commerce [Guidance to Address Racially-Disparate Impacts](#) (see Appendix A on race and zoning).

The transportation goals and policies are clearly informed by the multicounty planning policies but do not yet include data and analysis. We look forward to seeing a draft of the complete transportation element with required inventories, land use assumptions, travel demand analysis, financing plan, etc. The transportation section of the [Comprehensive Plan Consistency Tool](#) outlines these requirements. We are happy to review the draft element once all the required analysis is available.

- The region's multicounty planning policies (MPP-DP-52-53) call for addressing multimodal level of service standards in transportation planning. Given the policy focus on vehicle LOS standards in the draft goals and policies, the transportation element should also discuss how LOS for bicycle, pedestrian, and transit modes are addressed. More information is available in PSRC's [Transportation Element Guidance](#)

PSRC has resources available to assist the city in addressing these comments and inform development of other draft plan elements on the [Planning Resources](#) page. We appreciate the opportunity to review and provide comments and look forward to reviewing the rest of the draft comprehensive plan. If you have any questions or need additional information, please contact me at LUnderwood-Bultmann@psrc.org

Thanks,

A handwritten signature in black ink that reads "Liz Underwood-Bultmann". The signature is written in a cursive, flowing style.

Liz Underwood-Bultmann
Principal Planner, Growth Management Planning
Puget Sound Regional Council

cc: Review Team, Growth Management Services, Department of Commerce