



## Puget Sound Regional Council

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October 22, 2024

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

Subject: PSRC Comments on City of Snoqualmie Draft Comprehensive Plan

Dear Ms. Arteche,

Thank you for providing an opportunity for the Puget Sound Regional Council (PSRC) to review the City of Snoqualmie draft comprehensive plan technical appendices. We appreciate that the city has invested a substantial amount of time and effort in developing the draft plan and appreciate the chance to review while in draft form. This timely collaboration provides an opportunity to review plan elements for the 2024 comprehensive plan and prepares the city well for [certification](#) by PSRC once the full plan has been adopted.

We encourage the city consider the following comments as further work is completed for the comprehensive plan update to align with [VISION 2050](#) and the Growth Management Act. We acknowledge the city has requested revised growth targets and housing need allocations through the King County countywide process, and our comments reflect the draft status of the plan. We encourage the city to work towards a final draft that uses land use assumptions and capacity figures that are consistent with the city's adopted growth targets and provide adequate capacity for housing by income band.

We reviewed the draft plan using the [VISION 2050 Consistency Tool](#). We previously provided comments on draft policies – please refer to previous correspondence on the draft policies and required components. Key sections of the consistency tool are listed below on the left along with relevant comments on the draft plan on the right:

**Regional Growth Strategy**

Plan Review Consistency Tool	PSRC Comment on Draft Plan
<p>Demonstrate sufficient zoned development capacity to accommodate targets (RCW 36.70A.115)</p> <p>Incorporate housing and employment targets (MPP-RGS-1-2)</p> <p>Use land use assumptions substantially consistent with countywide growth targets (RCW 36.70A.070, WAC 365-196-430, VISION 2050 Regional Growth Strategy)</p> <p>Use consistent land use assumptions throughout plan (RCW 36.70A.070, WAC 365-196-430)</p>	<p>We recognize that the city has requested a revised growth target of 715 housing units through the King County countywide process. As that process is resolved, please note that the final adopted plan and technical analyses must use the countywide growth targets (current or revised) for both land use and transportation planning.</p>

**Housing**

Plan Review Consistency Tool	PSRC Comment on Draft Plan
<p>Increase housing supply and densities to meet the region’s current and projected needs at all income levels consistent with the Regional Growth Strategy (MPP-H-1)</p> <p>Expand the diversity of housing types for all income levels and demographic groups, including low, very low, extremely low, and moderate-income households (MPP-H-2-6, H-9)</p>	<p>The city has requested revised housing need allocations through the King County countywide process commensurate with revised housing growth targets. As that process is resolved, the final plan must document housing capacity by income band consistent with countywide targets. <a href="#">Commerce’s Guidance for Updating your Housing Element (Book 2)</a> gives directions on how to document this information.</p> <p>Further, the plan must clearly document capacity for the city’s allocated emergency housing beds consistent with Commerce guidance (pp. 44-48).</p>

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<p>Address affordable housing needs by developing a housing needs assessment and evaluating the effectiveness of existing housing policies, and documenting strategies to achieve housing targets and affordability goals. This includes documenting programs and actions needed to achieve housing availability including gaps in local funding, barriers such as development regulations, and other limitations (H-Action-4)</p>	<p>The plan should provide a more complete documentation of potential regulatory barriers to affordable housing. Commerce’s <a href="#">adequate provisions checklist</a> can help document this work.</p>
<p>Identify potential physical, economic, and cultural displacement of low-income households and marginalized populations and work with communities to develop anti-displacement strategies in when planning for growth (MPP-H-12, H-Action-6)</p>	<p>The draft plan acknowledges concern for displacement. A policy to identify potential displacement of low-income households and to implement strategies to reduce and prevent displacement should be included in the comprehensive plan. PSRC’s <a href="#">Housing Opportunities by Place</a> Tool can be a useful resource on strategies to address displacement.</p>

### Transportation

Plan Review Consistency Tool	PSRC Comment on Draft Plan
<p>Provide travel demand forecasts and identify state and local system projects, programs, and management necessary to meet current and future demands and to improve safety and human health (RCW 36.70A.070, MPP-T-4-5)</p>	<p>The city must identify projects and programs, including roadway projects, non-motorized projects, and system maintenance, necessary to meet transportation demands. The city currently includes a six-year project list. The city is encouraged to provide a complete project list through 2044 that includes descriptive project titles and project types (nonmotorized, maintenance, etc.). Information on these requirements is provided in Commerce’s <a href="#">Transportation Guidebook</a> and <a href="#">PSRC’s Transportation Guidance</a>.</p>

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<p>Include a 20-year financing plan, as well as an analysis of funding capability for all transportation modes (RCW 36.70A.070(3), RCW 36.70A.070(6)(a)(iv), WAC 365-196-415, WAC 365-196-430, MPP-RC-11-12, T-6, T-15)</p>	<p>The Growth Management Act (RCW 36.70A.070(6)) requires that local comprehensive plans include a multiyear transportation financing plan for how the jurisdiction will meet the mobility needs identified for the planning period. The plan includes a list of funding sources and should also include estimated probable revenues available to the city and an analysis of the sufficiency of funding resources compared to estimated costs identified. Further guidance on how to address the financial analysis in the plan can be found in the Department of Commerce’s <a href="#">Transportation Element Guidebook</a>, pages 202-212.</p>
<p>Develop a comprehensive concurrency program that addresses level-of-service standards for multimodal types of transportation and include implementation strategies (RCW 36.70A.070, RCW 36.70A.108, MPP-DP-52-54)</p>	<p>VISION 2050 calls for multimodal level of service standards, and the Growth Management Act will also require these standards by 2029. The plan discusses establishing bicycle, pedestrian, and transit levels of service. PSRC encourages the city to make progress in this area. Resources on multimodal LOS can be found in <a href="#">PSRC’s Transportation Element guidance</a>.</p>
<p>Include state facilities and reflect related (regional/state) level-of-service standards (RCW 36.70A.070, RCW 36.70A.108)</p>	<p>The plan should include LOS standards for state facilities. PSRC has maps and more information on <a href="#">adopted LOS standards for state facilities</a>.</p>

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<p>Ensure mobility choices for people with special needs (MPP-T-10)</p> <p>People with mobility and accessibility needs/priority populations:</p> <ul style="list-style-type: none"> <li>• Youth</li> <li>• Older adults</li> <li>• People with low incomes</li> </ul> <p>People with disabilities</p>	<p>The draft plan includes a policy about mobility choices for people with special needs, but this would be strengthened by including further analysis on the topic. A brief discussion in the narrative portion of the plan about mobility options for people with special needs or locations where mobility barriers may exist would be beneficial.</p> <p>Additionally, if the city has completed an ADA transition plan, it should be incorporated into the plan by 2029 per HB 1181.</p>

### Environment/Climate Change

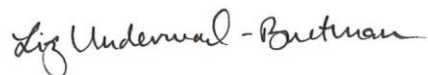
Plan Review Consistency Tool	PSRC Comment on Draft Plan
<p>Support achieving regional greenhouse gas emission reduction goals by:</p> <ul style="list-style-type: none"> <li>- Electrifying the transportation system,</li> <li>- Reducing vehicle miles traveled through increasing alternatives to driving alone and using land use strategies that reduce trips and trip length, and</li> <li>- Expanding the use of conservation, alternative energy sources, and energy management technology (MPP-CC-1, CC-3, CC-5, CC-11-12, CC-Action-3)</li> </ul>	<p>The plan should address regional policy on climate change, including recognizing regional climate goals in the plan document.</p> <p>PSRC's <a href="#">Climate Change and Resilience Guidance</a> provides this information and other resources. It is also recommended to reference the <a href="#">King County Greenhouse Gas Emissions Analysis</a>.</p>

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Identify and address the impacts of climate change and natural hazards on the region to increase resilience (MPP-CC-7-10, CC-Action-4)	The city should consider identifying hazards related to climate change, including mapping of these hazards. The <a href="#">Puget Sound Hazards Map</a> is a resource for this. A policy to address the climate hazards identified should also be included.

PSRC has resources available to assist the city in addressing these comments and inform development of the draft plan. We have provided links to online documents in this letter, and additional resources related to the plan review process can also be found on our [Planning Resources](#) page.

We appreciate all the work the city is doing and the opportunity to review and provide comments. We are happy to continue working with you as the draft progresses through the adoption process. If you have any questions or need additional information, please contact me at 206-464-6174 or [LUnderwood-Bultmann@psrc.org](mailto:LUnderwood-Bultmann@psrc.org).

Sincerely,



Liz Underwood-Bultmann, Growth Management  
Puget Sound Regional Council

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