



Memorandum

To: Planning Commission, City of Snoqualmie
From: Jeff Gray, MS, PWS
Mona Davis, Community and Economic Development Director, Snoqualmie
Copies:
Date: September 18, 2025
Subject: Critical Areas Ordinance: Summary of Changes from Approved December 2, 2024
CAO to Current
Project No.: 032703.V00

This memorandum summarizes updates to the City of Snoqualmie's Critical Areas Ordinance (CAO) [Snoqualmie Municipal Code (SMC) 19.12] and Flood Hazard Regulations (SMC 15.12) that have been made since the Planning Commission's approval on December 2, 2024. The Washington Growth Management Act (GMA) requires cities to update their CAO before December 31, 2024. Counties and cities have an additional 1-year extension, beyond the periodic update deadline, to complete the review and update pursuant to RCW 36.70A.130(7). All critical areas must be designated and functions and values protected using the best available science (BAS) information as required in the GMA.

Summary of Changes to SMC 15.12 (Flood Hazard Regulations) Since December 2, 2024

Following the Planning Commission's approval of the draft CAO and Flood hazard Regulations updates on December 2, 2024, the Economic Development Commission postponed review of draft code updates to further assess the status of the floodplain mapping for the Snoqualmie River. The updated Flood Hazard Regulations approved on December 2, 2024 included increasing the freeboard for new developments from one to three feet above the base flood elevation (BFE) of the 100-year flood event. Freeboard in floodplain construction is an additional vertical height above the minimum BFE for the finished floor elevation, serving as a safety margin against floods. The City of North Bend has adopted the two-foot standard, and King County has adopted the three-foot freeboard standard, for example.

Changes to the Flood Hazard Regulations are no longer proposed. King County prepared the *Snoqualmie River Hydrologic Study – Evaluation of Effects of Snoqualmie Falls Projects on Downstream Flooding* (2016) that showed downstream projects at the Snoqualmie Falls would result in a 1.4-foot drop in the river's 100-year BFE within the City. The USACE's 205 Project completed in 2004 widened the stream channel above Snoqualmie Falls, and Puget Sound Energy's (PSE) Snoqualmie Falls Project completed in 2012 widened the river channel and lowered the weir crest. The projected 1.4-foot decrease provides a factor of safety within the City because FEMA has not updated the Flood Insurance Rate Maps to reflect the modeled decrease in the BFE, and the City's flood hazard regulations are based on the current FEMA floodplain boundaries. King County is planning to update the hydrologic model for the Snoqualmie River, which will be used to update the FEMA flood maps and 100-year flood boundaries. King County is planning to submit a Letter of Map Revision (LOMR) to FEMA in 2026 to update the flood maps. The City can reassess the need for additional flood protections in the City code after the FEMA 100-year flood boundaries have been updated and established based on the current conditions.

Summary of Changes to SMC 19.12 (CAO) Since December 2, 2024

The City received comments on the proposed CAO updates on December 20, 2024 from the Washington Department of Fish and Wildlife (WDFW) and on December 30, 2024 from the Washington Department of Ecology (Ecology). The agency comments were received after the PC approved the updated CAO, and the pause to re-assess changes to the Flood Hazard Regulations offered an opportunity to incorporate additional changes. The City provided the updated CAO to WDFW in August 2025 for comment. Resolution of these comments are reflected in the current draft CAO. The following updates were made to the CAO that was approved by the PC on December 2, 2024:

- 1) Updated Table 19.12.170.1 (Wetland Buffers) to align with Ecology's most current guidance, including combining wetlands with a habitat score of 5 with low functioning wetlands that score 3 or 4.
- 2) Added a condition to the Reasonable Use Exception (SMC 19.12.040.C.5) that "The inability to derive reasonable economic use is not the result of the applicant's actions or that of a previous property owner, such as by segregating or dividing the property and creating an undevelopable condition."
- 3) Added two conditions at SMC 19.12.090.B.5 and .6 (Buffers) regarding functionally isolated buffers and allowances for single family residences part of a previously approved development:
 - a. SMC 19.12.090.B.5: Functionally isolated wetland buffers and riparian management zones. Areas that provide no ecological functions or values which are functionally separated from a wetland or stream by legally established roads, impervious surfaces, or structures, shall be excluded.
 - b. SMC 19.12.090.B.6: Single family residences part of a previously approved development are allowed improvements with a maximum footprint of 250 square feet, such as decks, patios, and appurtenances.
- 4) Updated Table 19.12.160-1 (Riparian Management Zone Widths). Retained previously proposed buffer increases for Class 2 streams from 75 to 200 feet, and Class 3 and 4 streams from 50 and 25 feet to 100 feet, respectively. Changes to Class 1 streams (Type S – Shorelines) are regulated under the Shoreline Management Program at SMC 19.08 and have been removed from this periodic code update for compliance with the GMA.