

Greater Maple Valley Area Council  
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Chair, GM&NR Committee  
King County Council  
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Chairman Gossett,

Please consider the comments herein as the official response from the Greater Maple Valley Area Council (GMVAC) regarding the King County Comprehensive Plan Update for 2008 (2008 Update).

The GMVAC has been monitoring the progress of the 2008 Update for over a year. Early on we assigned two GMVAC committees--*Land-Use* and *Transportation*--to conduct a detailed review of the *Public Review Draft* (the Draft) of the 2008 update. This review resulted in our comments on the Draft in December 2007. We also submitted additional comments in February of this year in response to new items (e.g., TDR changes, etc.) brought to our attention by DDES.

Our latest review is of the *Executive's Recommended Plan* submitted to the King County Council on March 1 and subsequently assigned to your committee for review. Although some of our concerns have been addressed or recommendations adopted by the *Executive's Recommended Plan*, there are still items that we wish to bring to your attention for action. These fall into the following major categories in the order in which they appear in the plan (chapter numbers are shown in parentheses): Residential Clustering (3), Public Transportation (7), Transportation Concurrency (7), Transportation Planning Coordination (7), and Industrial Clustering (9).

Attached please find a set of Detailed Comment Forms on each of these. Each form includes: citation of section/paragraph/policy; statement of concerns; and description of our proposed solutions. We believe that each of these major items is of import not only to Rural Area citizens, but also to all of King County.

We will continue to monitor the progress of the 2008 Update throughout the remainder of the year. Thank you.

Original signed by

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# Detailed Comments

## RESIDENTIAL CLUSTERING

### Citation Identification

p. 3-20: Chapter 3--Rural Area; Section II. Rural Densities & Development; Subsection E. Character / Development Standards; R-234

### Citations/Policies:

R-234: To maintain traditional rural development patterns ... Clustering of lots is permitted when:

a. The development provides equal or greater protection of the natural environment, natural resource lands, historic resources or archaeological sites;

b. Clusters are limited in size to be compatible with surrounding large lots or nearby agricultural and forestry uses;

c. The clustered development is offset with a permanent resource land tract preserved for forestry or agriculture, as designated by the owner at time of subdivision or short subdivision, or a permanent open space tract. Under no circumstances shall the tract be reserved for future development; and

d. The development can be served by rural facility and service levels (such as on-site sewage disposal and rural fire protection)."

### Concerns:

The Glossary (p. G-3) defines clustering as:

*"Clustering means developing a subdivision that reduces the individual lot areas to create permanent open space or a reserve for future development while it maintains the zoned residential density".*

However R-234c stipulates that *"under no circumstances shall the tract be reserved for future development"*.

**This is in direct contradiction to the Glossary definition of clustering.** The Greater Maple Valley Area Council opposes clustering since it is an urban style of development and should not be permitted in the unincorporated Rural Area.

What can be concluded about the county's actual long-range intentions? Once the land is developed as a cluster, can we really be sure that the rest of it won't be developed at some future date? R-234 opens the door for higher density development.

The phrase *"a reserve for future development"* in the definition of Clustering in the Glossary **effectively renders zoning null and void!** Existing regulation and procedures currently exist to deal with this situation. **Clustering is not needed in the rural area.**

### Proposed Solution:

**Delete R-234.** It violates the preceding policies R-230 through R-233 on p. 3-20.

# Detailed Comments

## PUBLIC TRANSPORTATION

### Citation Identification:

p. 7-4: Chapter 7--Transportation; Section I. Systems & Services; A. Public Transportation

### Citations/Policies:

NONE

### Concerns:

**Public transportation service in the Rural Area is poor at best.** Bus frequency, number of buses, bus routes and mobility, weekend service, and Park & Ride lot number and adequacy all are in need of vast improvements. In addition, there currently are few other mass transit choices available, such as commuter train service.

### Proposed Solutions:

**Increase bus frequency and number of buses from the current one-bus hourly service.** The cities of Maple Valley, Black Diamond, and Enumclaw, along with the adjoining Rural Area will use these improvements, as studies show that the ridership is there and will increase with increased frequency.

**Add bus routes and increase overall mobility by better accommodating buses on our major arterials in and out of the area (e.g., SR-169 and SR-516).** There currently is no advantage to carpool or take the bus, as you just experience the same bumper-to-bumper rush-hour traffic as everyone else. Consequently, for example, on SR-169 between the south Jones Rd intersection and Renton (where currently there already are four lanes--two each way) reversible lanes and/or HOV conversion of one existing lane each way should be considered. In the future, should the State decide to add lanes on SR-169, we recommend the following:

- **Add HOV lanes to accommodate buses, vanpools, and carpools.** This would provide real options to the single-occupancy vehicle and would improve mobility for both people and goods--which is the overriding objective of our Transportation System.
- **Add weekend bus service.** Start small and monitor ridership to meet increasing needs.
- **Add Park & Ride lots** and increase capacity and quality of existing lots.
- **Restore rail tracks along old SR-169 corridor to accommodate new commuter train service.** This would provide an additional option for the mass transit commuter. As has been done elsewhere, this can be accomplished without compromising the existing trail along the corridor.

# Detailed Comments

## TRANSPORTATION CONCURRENCY

### Citation Identification:

p. 7-13: Chapter 7--Transportation; Section II. Linking Transportation With Growth; D. Concurrency; T-216 & a-d

### Citations/Policies:

T-216: "To ensure that adopted ((LOS)) level of service standards are met, transportation improvements or strategies needed to serve new development must be currently in place, or construction for needed improvements must be funded in the adopted Six-Year Capital Improvement Program."

T-216a: "A concurrency travel shed is a geographic area within unincorporated King County where all development within the travel shed would be likely to use or be affected by traffic on arterials within the travel shed."

T-216b: "The concurrency program shall include provision for mobility areas within travel sheds. Urban mobility areas shall be defined as areas coinciding with urban commercial centers. Rural Mobility areas shall be defined as unincorporated Rural Towns as designated in the King County Comprehensive Plan."

T-216c: "The map shall divide the area into travel sheds and shall show areas of unincorporated King County that meet concurrency standards. Any proposed development in areas that are shown on the map to meet concurrency standards will be deemed concurrent."

T-216d: "The concurrency test shall be based on the level of service on arterials in unincorporated King County using established level of service analysis methodology. The test shall not be applied to designated Highways of Statewide Significance (HSS)."

### Concerns:

**We remain concerned with the 6-year lag time, as it ensures that needed infrastructure never catches up.** It also tends to give a "free ride" to unsustainable development, thus contributing to more sprawl, more traffic congestion, and higher taxes to meet the newly created needs.

**The new "travel shed" and "mobility area" concepts appear to be a way to side-step concurrency rules now on the books** by allowing development in an area that really can't sustain it, nor has adequate infrastructure. Additionally, with the County accommodating Industrial Clusters in the Rural Area (p. 9-5), it cannot logically advocate the increase in traffic such a decision would bring; while it is also effectively gutting key Transportation Concurrency policies described herein.

**The Highways of Statewide Significance (HSS) exception appears to be a vast loophole** that allows major thoroughfares such as the extremely congested SR-169 (Maple Valley Highway) to not have to undergo the Concurrency Test. **The stated purpose of Transportation Concurrency is to ensure that current or planned infrastructure is capable of meeting the needs of existing and planned new development.** The greater Maple Valley area is currently all "red" on the concurrency maps--as it should be given all of our traffic congestion. Yet, **the HSS exception turns SR-169 "green"** thus ignoring this fact and therefore allowing more unsustainable development. This does not make sense as it harms our residents' quality of life and is economically unfeasible.

### Proposed Solution:

**Eliminate the 6-yr lag time loophole** for transportation infrastructure to *catch-up* to new development. Begin evaluating proposed new development against existing infrastructure.

**Eliminate the proposed "travel shed" and "mobility area" concepts.**

**Do not give Highways of Statewide Significance a free pass against Transportation Concurrency tests.** If the County cannot do this for State highways, then we suggest the County lobby the Governor and the State Legislature to change this exception that overrides our local land-use planning and appears to violate the tenets of the State's Growth Management Act.

# Detailed Comments

## TRANSPORTATION PLANNING COORDINATION

### Citation Identification:

p. 7-28: *Chapter 7--Transportation; Section V. Coordination and Public Outreach*

### Citations/Policies:

T-120: "King County should work with the cities and other affected agencies to develop a regional parking strategy. This strategy should be consistent with regional and local transportation plans. King County should encourage shared parking facilities in areas where high-density, mixed-use development is planned and where walking is convenient for short trips. This strategy should include establishing minimum and maximum parking ratios."

### Concerns:

Section V. Coordination and Public Outreach states that all elements of the transportation system are planned and operated in coordination with cities, etc. (e.g., T-120) and with support from various agencies such as the Unincorporated Area Councils. **The GMVAC sees little coordination here or with other areas of the Comprehensive Plan that might affect the Transportation Plan.**

**An excellent example of such lack of coordination is King County Parks' proposed Regional Sports Complex at Ravensdale Park.** This facility is a serious development for the Rural Area and will certainly affect traffic in the Rural Town of Ravensdale. Furthermore, we see very little mention of the planned changes to Black Diamond or anything in the projected Transportation Needs Report (TNR). This development will certainly have an impact on the rural roads in SE King County. We see no project identified in the TNR identifying changes in access roads to Ravensdale or possible traffic light additions that might be required from the development of a Regional Park.

### Proposed Solutions:

**Ensure real transportation coordination is achieved by requiring a Transportation Impact Statement (TIS) be developed by King County Departments to evaluate and report direct and indirect impacts of their proposed projects on all local roads and thoroughfares.** Such a TIS could be akin to an Environmental Impact Statement. A TIS should be **developed at the earliest stages of proposed projects**. This is especially critical in areas, such as the greater Maple Valley area, which according transportation concurrency maps, is all RED, and thus ill equipped to take on more major development.

# Detailed Comments

## INDUSTRIAL CLUSTERING

### Citation Identification:

p. 9-5: *Chapter 9--Economic Development; Section II. Business Development; ED-109*

### Citations/Policies:

ED-109: "King County supports programs and strategies to help create, retain, and expand homegrown businesses in basic industries, particularly ~~((within the county's manufacturing and industrial areas))~~those industrial clusters offering the best opportunities for business growth and job creation as identified in the Regional Economic Strategy."

### Concerns:

**The new wording, "industrial clusters" opens the door for supporting new unwanted infrastructure in the Rural Area.** While most of the industrial sites are located in the I-5/I-405 corridor, the push to move jobs out to the rural area to help avoid further traffic problems could result in some of this clustering migrating into the unincorporated Rural Area.

Should *existing* Transportation Concurrency policies change (e.g., "Travel Sheds" (p. 7-12), "Mobility Areas" (p. 7-12), and "Transportation Adequacy Measure Standards for Concurrency" (p. 2, Title 14), then our concerns regarding "industrial clusters" are further reinforced.

### Proposed Solution:

**Ensure that proposed "industrial clusters" would not be able to supercede zoning requirements. While keeping industry clustered together is desirable, it should not receive a pass on meeting the zoning requirements. This is especially true in the Rural Area.**