

June 6, 2011

Growth Management Planning Council
c/o King County Department of Development and Environmental Services
Attn: Paul Reitenbach
900 Oakesdale Ave SW
Renton, WA 98057-5212

The Greater Maple Valley Unincorporated Area Council (GMVUAC) takes this opportunity to submit Public Comments on the Public Review Draft of the County-Wide Planning Policies (C-WPPs). The GMVUAC believes that our community's Rural Character will be supported by: facilitating strong local ties and communication between the public, organizations, and government; promoting locally owned businesses and supporting quality education; protecting the environment and maintaining landowners' rights and responsibilities; promoting controlled and well-planned growth with appropriate infrastructure; ensuring proper representation for rural interests and needs; and supporting the health and safety and the privacy of our vibrant community.

We have specific concerns regarding the siting of Schools in the Rural Area to primarily serve adjacent Urban needs. This is not only an important issue to the GMVUAC, but to all Rural Area UACs.

We support the goal of the Development Patterns chapter to protect rural and resource lands. Under the Rural Area and Resource Lands section we support the following policies: **DP-44, 46, 48, and 49**--all limiting public facilities located in the Rural Area to a size and scale appropriate to serve the Rural Area.

We support the following policies under the Utilities section in the Public Facilities and Services chapter: **PFS-12** to prohibit sewer expansion in Rural Areas and **PFS-18** to locate educational services and facilities that serve urban populations within the Urban Growth Area.

In addition, we fully support Written Comments provided to you on April 27 by the Chair of our Growth Management Committee and Vice-Chair of our Transportation Committee, Peter Rimbos (see below at the end of this letter).

Please give careful consideration to adopting these Staff-recommended Policies. Thank you.

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Chair, GMVUAC
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County-Wide Planning Policies (CPPs) Written Testimony--Transportation

My name is Peter Rimbos. I serve as the Greater Maple Valley Unincorporated Area Council's (GMVUAC's) Growth Management Committee Chair and Transportation Committee Vice-Chair. My comments deal with the Transportation chapter of the current Public Review Draft of the County-Wide Planning Policies (CPPs) and can be found under "**Proposed Policies**" below.

In addition, the current Public Review Draft differs markedly from the "existing" December 2010 CPP Update, especially in tone and emphasis when it comes to Transportation-related policies. I address this under "**What is Missing**" below.

Proposed Policies

Supporting Growth

Goal Statement: *Local and regional development of the transportation system is consistent with and furthers realization of the regional growth strategy.*

T-2 *Avoid construction of major roads and capacity expansion on existing roads in Rural Areas and Resource Lands. Where increased roadway capacity is warranted to support safe and efficient travel through Rural Areas, appropriate rural development regulations and effective access management should be in place prior to authorizing such capacity expansion in order to make more efficient use of existing roadway capacity and prevent unplanned growth in Rural Areas.*

T-7 *Ensure State capital improvement policies and actions are consistent with the Regional Growth Strategy and support VISION 2040 and the Countywide Planning Policies.*

T-8 *Prioritize regional and local funding to transportation investments that support adopted growth targets.*

I support these proposed policies. However, there must be a way to use a "carrot-and-stick" approach when it comes to compelling a municipality to not exceed its Growth Targets. Unfortunately, the City of Black Diamond with the Yarrow Bay-proposed Master Planned Developments (MPDs) will greatly exceed its growth targets. In fact, **the MPDs will quintuple the size of Black Diamond's population from 4,200 to 20,000!** This makes a mockery of the intent of the State Growth Management Act (GMA). Growth Targets, once established, should have meaning.

System Operations

Goal Statement: *The regional transportation system is well-designed and managed to protect public investments, promote public health and safety, and achieve optimum efficiency.*

T-22 *Plan and develop a countywide transportation system that reduces greenhouse gas emissions by advancing strategies that shorten trip length or replace vehicle trips to decrease vehicle miles traveled.*

T-23 *Apply technologies, programs and other strategies that optimize the use of existing infrastructure in order to improve mobility, reduce congestion, increase energy-efficiency, and reduce the need for new infrastructure.*

I support these proposed policies to use transportation demand management decreasing vehicle miles traveled. Please retain and forward these for eventual adoption by the GMPC.

What is Missing

The following excerpts were taken from four sections found in the “existing” December 2010 CPP Update:

Section 3 -- Freeways/Highways/Arterials

FW-22 *Where appropriate, King County and its cities shall adopt a clear definition of level-of-service and concurrency requirements and establish a consistent process for implementing concurrency, including accountability for impacts for adjacent jurisdictions.*

Section 4 -- Transportation Level-of-Service (LOS)

T-9 *Level-of-service standards shall be used as a tool to evaluate concurrency for long-range transportation planning, development review and programming of transportation investments.*

I support both **FW-22** and **T-9** policies as level-of-service and concurrency requirements must be consistently applied and enforced and should inform future financial planning.

Section 5 -- Reassessment

T-15 *Local governments shall work together to reassess regional land use and transportation elements if transportation adequacy and concurrency cannot be met. Should funding fall short for transportation improvements or strategies needed to accommodate growth, the following actions should be considered:*

- a. Adjust land use and level-of-service standards to better achieve mobility and the regional vision;*
- b. Make full use of all feasible local option transportation revenues authorized but not yet implemented; and*
- c. Work with Washington State Department of Transportation, METRO, and the private sector to seek additional State transportation revenues and local options to make system improvements necessary to accommodate projected employment and population growth.*

I support **T-15** to compel “local governments to reassess land use and transportation elements if transportation adequacy and concurrency cannot be met.” Once again, the City of Black Diamond’s *laissez-faire* attitude with the Yarrow Bay-proposed MPDs serves as a prime example of why not following such policy can be so detrimental to both itself and the surrounding Urban and Rural Areas.

Section 7 -- State Transportation Role

T-20 *Consistent with the Countywide vision, local governments shall coordinate with the State on land use and transportation systems and strategies which affect State facilities and programs.*

T-21 *State capital improvement decisions and policy actions shall be consistent with regional and Countywide goals and plans. The State shall ensure its transportation capital improvement decisions and programs support the adopted land use plans and transportation actions.*

T-22 *The State and local governments shall use the same capital programming and budgeting time frame that all local governments and the County use, a minimum of six years, for making capital decisions and for concurrency management.*

T-20 thru T-22 are good and I support them. However, the 6-year “lag” time built into Concurrency often serves as a “loophole.” The GMVUAC has lobbied KCDOT through the King County Comprehensive Plan (KCCP) Update process to eliminate or alter such language. Our rationale has been and remains that quite often a project is listed on a long-range plan, but then never sees funding or simply keeps getting moved out to the right on the schedule, even though the development was approved based on that project being funded and built on time. This simply becomes a game of playing catch-up in which we all lose, except the developers, because we never do actually catch up.

Consequently, I strongly recommend the above “existing” policies -- **FW-22, T-09, T-15, T-20, T-21, and T-22** -- be retained as is.