

Transportation-related Comments on Proposed 2016 KCCP Update

Chapters

CHAPTER 1—REGIONAL PLANNING (In development; to be submitted in June)

CHAPTER 2—URBAN COMMUNITIES (In development; to be submitted in June)

CHAPTER 3—RURAL AREA AND NATURAL RESOURCE LANDS (In development; to be submitted in June)

CHAPTER 4—HOUSING AND HUMAN SERVICES (No review)

CHAPTER 5—ENVIRONMENT (In development; to be submitted in July)

CHAPTER 6—SHORELINE MASTER PROGRAM (No review)

CHAPTER 7—PARKS, OPEN SPACE, & CULTURAL RESOURCES (In development; to be submitted in July)

CHAPTER 8—TRANSPORTATION

1. **T-102** *“As a transportation provider and participant in regional transportation planning, King County should support, plan, design, and implement an integrated, coordinated and balanced multimodal transportation system that serves the growing travel needs of the county safely, effectively and efficiently and promotes a decrease in the share of trips made by single occupant vehicles.”*

CONCERN: *Regional policies should explore the establishment of County road “networks,” which know no jurisdictional boundaries (similar to State roads), funded by all County taxpayers. We reviewed the January 2016 recommendations of the County Bridges and Roads Task Force, but they inexplicably did not include establishing County road “networks.” We urge the Council to explore this concept and, therefore, we make the following RECOMMENDATION.*

RECOMMENDATION: *A second sentence should be added to T-102: “King County should explore establishing county-wide “road networks,” which know no jurisdictional boundaries, or a Transportation Benefit District, both funded by all County taxpayers.”*

2. **T-208** *“King County shall not add any new arterial capacity in the Rural Area or ~~((natural resource lands))~~ Natural Resource Lands, except for segments of rural regional corridors that pass through ~~((rural or resource lands))~~ Rural Areas and Natural Resource Lands to accommodate levels of traffic between urban areas. Rural regional corridors shall be identified in the Transportation Needs Report*

(Appendix C) and shall meet all of the following criteria:

- a. Connects one urban area to another, or to a highway of statewide significance that provides such connection, by traversing the Rural Area and Natural Resource Lands;
- b. Classified as a principal arterial;
- c. Carries high traffic volumes (at least 15,000 ADT); and
- d. At least half of P.M. peak trips on the corridor are traveling to cities or other counties.”

CONCERN: Such “rural regional corridors,” so designated “to accommodate levels of traffic between urban areas,” cannot be sustainably funded simply by Rural Area property taxes. T-208 simply provides a means of identifying such “corridors,” but provides no solutions. The same could be said for Policies T-403 and T-407 later in this chapter. They state solutions should be found, yet identify none.

RECOMMENDATIONS: Besides RECOMMENDATIONS given under T-102 above, to begin to address the Rural road usage/funding imbalance problem State laws (RCWs 36.78, 46.68, 120-124, & 84.52) could be reviewed for opportunities to enable a more transportation-sustainable allocation of gas tax monies and provide more flexibility in revenues used. Working with the State, some mechanism should be developed, along with incentives, for cities to share revenues with Counties, possibly tied to growth that occurs in the absence of job opportunities. While we understand State law changes are outside the scope of the Comprehensive Plan update, policies herein should explore the Puget Sound Regional Council’s (PSRC’s) Transportation 2040 user-pays model by providing authority for usage charges, such as tolling key roads and methods to implement such strategies.

3. **T-212** “King County shall work with cities for the annexation of county-~~(owned)~~ roadways and/or street segments located in the urban area and within or between cities, in order to provide for a consistent level of urban services on the affected roads and reduce the burden on unincorporated taxpayers that are supporting this urban infrastructure.”

RECOMMENDATION: We strongly support the Executive’s recognition of the unsustainable funding problem for unincorporated transportation infrastructure.

4. II. Providing Services and Infrastructure that Support the County Land Use Vision / ~~(H)~~ **G. Concurrency**

CONCERN: Concurrency must have an enforcement mechanism, be linked to a public dialog, and include “regional” perspective among multiple jurisdictions. Infrastructure needs should be identified as early and accurately as possible, with implementation of identified improvements truly concurrent, otherwise the development approval must be delayed or denied.

5. **T-224** “In the Rural Area, the concurrency test may include a provision that allows the purchase of Transferable Development Rights in order to satisfy transportation concurrency requirements.”

We wholly concur with Docket Item #15 to eliminate T-224 as TDRs should not be used to satisfy Concurrency testing anywhere within the Rural Area. Concurrency is a tool used to ensure infrastructure keeps up with development. The use of TDRs to satisfy Concurrency testing does nothing to help reach that goal and, in fact, can hinder reaching that goal. Consequently, we provide the following:

CONCERN: *Within a failing Travel Shed purchasing TDRs should not allow granting of a Concurrency certificate, since traffic is still being added to a failing area. We asked KCDOT if examples exist where T-224 was applied? KCDOT's Ruth Harvey responded the Policy has never been applied. We have communicated with KC DNRP's Darren Greve regarding the TDR program. Consequently, we suggest the following RECOMMENDATIONS:*

RECOMMENDATION: *Eliminate Policy T-224, as TDRs should not be used to satisfy Concurrency testing anywhere within the Rural Area.*

Concurrency is a tool used to ensure infrastructure keeps up with development. The use of TDRs to satisfy Concurrency testing does nothing to help reach that goal and, in fact, can hinder reaching that goal.

RECOMMENDATION: *Add a new Policy under Concurrency to address the item the KC Council added to "Scope of Work" as follows:*

T-xxx *When conducting concurrency testing, King County shall collaborate with other jurisdictions to ensure infrastructure improvement strategies help prevent travel shed failure caused by unfunded city and state projects and traffic generated outside the unincorporated area.*

6. **P. 8-38:** **IV. Financing Services and Facilities that Meet Local and Regional Goals/ B. Road-Related Funding Capabilities.** Rural Area taxpayers should not be providing diminishing tax monies any more than they already are to enhance or expand urban-to-urban travel corridors. King County should adopt a long-term vision that recognizes the reality of long-term road revenue shortfalls and should act proactively to avoid decreases in future funding levels. Policies herein should be based on such realities in order to be successful. Consequently, we recommend the following :

RECOMMENDATION: *On p. 8-38, add the following to the end of the second paragraph:*

"Without a critical revision to our statewide tax code or the State gas tax jurisdictional distribution formula being modified to reflect the reality that many County roads are used by Urban commuters, it is highly predictable that the tax base for Roads funding will never return to pre-recession values in real terms."

CHAPTER 9—SERVICES, FACILITIES, & UTILITIES (In development; to be submitted in June)

CHAPTER 10--ECONOMIC DEVELOPMENT (In development; to be submitted in June)

CHAPTER 11—COMMUNITY SERVICE AREA PLANNING (No comments)

CHAPTER 12— IMPLEMENTATION (In development; to be submitted in June)

Technical Appendices

Technical Appendix A—CAPITAL FACILITIES (No review.)

Technical Appendix B—HOUSING (No review.)

Technical Appendix C—TRANSPORTATION (No comments.)

Technical Appendix C1—TRANSPORTATION NEEDS REPORT (TNR)

1. **CONCERN:**

A great dichotomy exists between growth targets, which are not forecasts, and identifying and addressing transportation needs. Such a gap complicates planning efforts and, as more development occurs, could result in inadequate infrastructure to meet GMA Concurrency requirements. Clearly realistic forecasts, not allocated growth targets, should be the primary information used in Comprehensive Planning and identification of infrastructure needs.

The PSRC states: “No direction is given in the GMA as to the methodology for setting growth targets. Cities and counties have a duty to accommodate the targets, but are provided broad discretion on how they do so.” (“Growth Management by the Numbers,” July 2005, p. 11.) This can result in an opaque process through which cities utilize selective criteria to furnish information they deem relevant or advantageous.

Further, jurisdictions can grossly exceed their growth targets. This was the case in 2012, as a small city in Southeast King County, in one of the fastest growing and heavily congested areas in the State, with a growth target of 1,900 new residences, signed Development Agreements that would eventually bring an additional 6,050 residences, or approximately 20,000 people, into the city. This scenario could easily repeat itself throughout the county and state as long as it remains to each county and its cities to determine what is relevant in developing such projections.

RECOMMENDATION:

Although outside this Comprehensive Plan update, potential solution paths for discussion could include changes in State law to establish criteria that will ensure realistic forecasting, not minimum growth targets, inform Comprehensive Planning and Transportation Needs Reports. The following RCWs could provide such opportunities:

RCW 43.62 -- DETERMINATION OF POPULATIONS -- STUDENT ENROLLMENTS

43.62.035 -- Determining population -- Projections

RCW 36.70A -- GROWTH MANAGEMENT -- PLANNING BY SELECTED

COUNTIES & CITIES.

36.70A.040 -- Who must plan -- Summary of requirements—Development regulations must implement comprehensive plans [Requires cities and unincorporated areas to plan for future growth through formation of Comprehensive Plans. In King County, Comprehensive Plans are reviewed/revised every four years with the current target year of 2025. Many King County cities currently are updating their Comprehensive Plans to be completed by June 2015.]

Technical Appendix C2—REGIONAL TRAILS NEEDS REPORT (No comments)

Technical Appendix D—Growth Targets and Urban Growth Area (No comments)

Technical Appendix R—PUBLIC OUTREACH FOR DEVELOPMENT OF COMPREHENSIVE PLAN (No comments)

Attachments

Attachment—SKYWAY-WEST HILL ACTION PLAN (No review)

Attachment—AREA ZONING STUDIES (In development; to be submitted in June)

Attachment--DEVELOPMENT CODE STUDIES (In development; to be submitted in June)

Attachment—POLICY AMENDMENT ANALYSIS MATRIX (No comments)

Attachment—PUBLIC PARTICIPATION REPORT (No comments)