

Date: March 10, 2023
To: King County Growth Management Planning Council (GMPC)
Subject: Public Written Testimony—4:1 Program Review

As part of our continuing work on the **2024 KCCP Major Update (Update)**, our Joint Team of King County Rural Area UACs / UAAs/ Organizations (*) continues to interact with the GMPC on key **Update** issues such as the *4:1 Program Review* and Urban Growth Area (UGA) *Expansion*. Herein we provide for your consideration Public Comment on the ongoing *4:1 Program Review*.

(*) *Enumclaw Plateau Community Association (EPCA), Friends of Sammamish Valley (FoSV), Greater Maple Valley Unincorporated Area Council (GMVUAC), Green River Coalition (GRC), Green Valley/Lake Holm Association (GV/LHA), Hollywood Hill Association (HHA), Soos Creek Area Response (SCAR), Upper Bear Creek Unincorporated Area Council (UBCUAC), and Vashon-Maury Island Community Council (VMCC).*

The following ten items are part of the GMPC's *4:1 Program Review*. The Interagency Joint Team (IJT) is reviewing each and formulating recommendations to the GMPC, some already have gone forward, while some still are in the works. We provide Public Comment below on each:

1. **Procedural improvements** — Defer to IJT and Staff recommendations on applications and process.
2. **Reduced or variable ratio** — Support IJT recommendation to *not* allow, as program criteria *already* requires the open space to be of “*high conservation value.*”
3. **Noncontiguous open space** — Support as long as the UGA for the urban portion of the 4:1 is fully *buffered* and the noncontiguous open space is adjacent to and buffers an unbuffered portion of the UGA. Currently the IJT is working on criteria. We support this potential to buffer more UGA, but await the criteria.
4. **Urban-serving facilities** — Support the IJT recommendation to not allow in the Rural Area.
5. **4:1 as a residential-only program** — Support keeping residential *only*, as we do not support including commercial, industrial, and institutional facilities, which are major trip generators. Also, most of the 4:1s have been and will be far too small to support anything other than residential and are located on the edge of the UGA.
6. **TDRs** — TDRs should *not* be used instead of open space owned-in-fee and under public ownership.
7. **Cascading 4:1s** — Should *not* be allowed. There are several places in *existing* 4:1s (e.g., Ruth/Soos Creek Park; Reserve at Covington Creek; Rainier Ridge/Black Diamond Open Space) where the open space has *not* fully buffered the UGA and a 4:1. The *unbuilt* Reserve at Covington Creek would have an *unbuffered* UGA in the 4 acres for every acre urban sense and is still unclear, because it uses TDRs instead. Kirkland annexed a 4:1 and adjoining open space, so the UGA is *outside* of the open space and remains unclear if it is buffered. We strongly support no 4:1 *cascade* off an existing 4:1—we await a policy proposal.
8. **Increase minimum density** — Support an increase from 4 units/ac to 8 units/ac, as, to some degree, this will address affordable housing and housing supply.
9. **1994 UGA, JPA UGA, current UGA or some combination** — No opinion yet and await IJT recommendations or further direction from the process. That said, we do *not* support the current UGA as the line for 4:1. We do support the 1994 UGA and will review, possibly, adding the JPA UGA to the 1994 UGA.
10. **Annexation** — Whether a 4:1 not likely to be annexed in a timely manner be allowed is a complicated issue. We support the current IJT recommendation of yes. About 65% of the UGA is protected with 4:1s, large projects that follow 4:1 principles, or County-owned Open Space. Much of the unprotected UGA is next to Fairwood or other urban unincorporated areas and no 4:1s in those places would be allowed, if the policy is changed. However, given the County's continual difficulty in securing annexation of any of these areas by adjacent cities, it is possible it might oppose any more urban unincorporated areas be created. We would support such a reasonable position.

Thank you for considering our comments herein as the GMPC continues its *4:1 Program Review*.

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