

Date: September 1, 2023

To: King County Growth Management Planning Council (GMPC)
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Subject: Additional Comments—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 its interaction with the GMPC on key **Update** issues such as the *4:1 Program Review* and Urban Growth Area (*UGA*) *Expansion*. Previously, we provided either oral or Written testimony to the GMPC on January 25, March 22, May 3, and May 17—all in 2023. Herein we provide for your consideration *additional* Public Comment on the ongoing *4:1 Program Review*, specifically related to WSDOT's July 12, 2023, letter.

Introduction

Thank you for the opportunity to comment. Our Joint Team of Rural Area organizations has been involved with the GMPC's 4:1 Program Review since April of 2022. With new information our position on revisions and updates to the 4:1 Program has changed.

We support only the original 1994 UGA as the basis for 4:1 Projects and urge that the GMPC preliminary recommendation to use select JPAs be discarded. The July 12, 2023, WSDOT letter makes several important points with which we agree.

Use the 1994 UGA

Allowing 4:1 UGA expansions for the JPA of only Snoqualmie and North Bend has the potential to create significant issues in and around both cities. The amount of potentially Urban areas enabled by the JPA UGA can only be understood and evaluated by eventually including all JPAs. There is also no reasonable and structured basis for applying rules inconsistently in this way only for the benefit of select cities. When the JPAs were agreed to, each City understood and approved the boundary that was being set just like the 1994 UGA cities did. It was very clear at the time that these boundaries are long term, with clear policies and no 4:1s. The proposal to use some JPA Boundaries also creates precedent leading to potentially more issues should Black Diamond request the same approach.

WSDOT Letter

The WSDOT letter rightfully speaks to the need for certainty when planning large public infrastructure projects. This is a primary purpose of Growth Management. The JPA was never intended to be a line where expansion would occur within a long term planning horizon. Until the region as a whole documents the need for additional Urban land through accepted policies, there should be no allowance for select cities to do so on their own by enabling some JPA boundaries for 4:1. WSDOT is accurately stating its expected parameters of growth that were planned for with the expansion of the interchange at I-90 and Hwy 18.

Dangerous two-plus-mile backups are routine at the I-90 / SR-18 interchange and WSDOT is right to call out the fact that adding Urban in that area will likely lessen the effective life of the planned expansion for traffic purposes and necessitate further improvements much sooner than otherwise. And such improvements may not even be feasible as an add-on to what's been designed now for upcoming construction and within the budget. Planning should always take the long view to assure that current design decisions are consistent with longer range future needs and funding. And the governing jurisdictions need to respect and abide by those planning parameters.

Major Program Decisions Are Not Dictated By One Property

We are well aware there is a particular property that seems to be driving the request to use the JPA UGA for 4:1s. We also are aware this project recently has been redesigned and downsized.

We are very clear this decision is not about, and should never be about, one property. The City of Snoqualmie's own letter seems to refer *only* to the potential traffic that may result from this project and ignores the other possible 4:1s that would be enabled. In fact, this decision enables many more properties to seek Urban uses, without any assessment of their potential impacts. Going further, the City of Black Diamond might seek the same concession in the future that could result in additional County-wide impacts. This is not a responsible way to do growth management planning and is, in fact, the opposite of principles established in GMA, as stated in RCW 36.70A.070(6)(vii)(c):

"The transportation element described in this subsection (6), the six-year plans required by RCW 35.77.010 for cities, RCW 36.81.121 for counties, and RCW 35.58.2795 for public transportation systems, and the ten-year investment program required by RCW 47.05.030 for the state, must be consistent."

Such consistency cannot be determined without areawide comprehensive plan-level analysis, which the JPA proposal at hand totally ignores.

Recommendation

We request the GMPC reconsider its vote to include the JPA UGA of Snoqualmie and North Bend for the purpose of 4:1 expansions. We request 4:1 expansions continue to be sited only on the 1994 UGA, as is currently done.

Thank you for considering our comments herein as the GMPC continues its 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).

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