

KING COUNTY
 COMPREHENSIVE PLAN 2000
 FINAL SUPPLEMENTAL
 ENVIRONMENTAL IMPACT STATEMENT

NOVEMBER 9, 2000

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King County
Department of Development
and Environmental Services
900 Oakesdale Avenue Southwest
Renton, WA 98055-1219

November 9, 2000

Dear Interested Reader:

A copy of the Final Supplemental Environmental Impact Statement (FSEIS) for the King County Comprehensive Plan 2000 and implementing development regulations is attached. This FSEIS has been prepared pursuant to the State Environmental Policy Act (SEPA) and Rules contained therein (WAC 197-11-400) for use by the public, agencies, groups and decision-makers in review of the proposal and alternatives.

Copies of the FEIS are available for public review at all King County Libraries and on the Internet at www.metrokc.gov/ddes. In addition, copies of the FEIS are available at the King County Department of Development and Environmental Services, 900 Oakesdale Avenue SW, Renton, Washington during the hours of 8:30 am to 4:30 pm Monday through Friday (10:30 am to 4:30 pm on Wednesday). There is a postage and handling charge of \$3.50 for mailed requests.

The proposed programmatic action is a year 2000 update of King County's 1994 Comprehensive Plan. This update includes proposed changes and additions to land use policies as well as associated proposed regulatory, land use, and zoning code changes. A Draft Supplemental Environmental Impact Statement (DSEIS) was published April 26, 2000, for public review and comment and a public hearing was held on May 24, 2000 to receive oral comments on the draft. The FSEIS includes all comment letters received on the DSEIS and the public hearing as well as responses to those comments. The Draft and Final documents should be used together to evaluate the environmental impacts of the proposal. This FSEIS supplements prior SEPA documentation issued on the 1994 Comprehensive Plan and subsequent amendments to the Plan.

Future actions include adoption of the proposed amendments and regulations by the King County Council. There is no comment period on the document. Action may be taken by the Council seven days after the document is published.

Any questions on the DEIS should be addressed to: Barbara Heavey, EIS Project Coordinator, King County Land Use Services Division, 900 Oakesdale Avenue SW, Renton, Washington 98055 (206) 296-7222. Questions on the proposed amendments should be addressed to Beth Mountsier, Lead Staff, King County Council at (206) 296-0319 or Karen Wolf, King County Comprehensive Plan Project Manager, Office of Regional Policy and Planning at (206) 205-0704.

Thank you for your interest and participation in the environmental review process for King County Comprehensive Plan 2000.

Greg Borba
SEPA Responsible Official

DEC 13 2000

**FINAL
SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT
FOR THE**

**KING COUNTY COMPREHENSIVE PLAN 2000
AND IMPLEMENTING DEVELOPMENT REGULATIONS**

**Prepared for the Review and Comment of Citizens,
Citizen Groups, and Government Agencies**

in compliance with

**The State Environmental Policy Act (SEPA)
Chapter 43.21C of the Revised Code of Washington**

**SEPA Rules
Chapter 197-11, Washington Administrative Code**

Chapter 20.44, King County Code

Date of Issue: November 9, 2000

FACT SHEET

Proposed Action: The proposed programmatic action is a year 2000 update of King County's 1994 Comprehensive Plan. This update includes proposed changes and additions to land use policies as well as associated proposed regulatory, land use, and zoning code changes.

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Permits and Approvals: King County Council Approval

Location of Background Data: Background data for this EIS may be found at:

King County Department of Development and Environmental Services,
900 Oakesdale Avenue Southwest, Renton, Washington 98055-1219

King County Office of Regional and Policy Planning, King County
Courthouse, 516 Third Avenue, Seattle, Washington 98104-3271

Date of Issue of the Final SEIS: November 9, 2000

Cost and Availability of Final SEIS to the Public:

Copies of the Final SEIS have been printed, distributed, and made available for public review. Additional copies are available from King County Department of Development and Environmental Services, Land Use Services Division, 900 Oakesdale Avenue SW, Renton, WA 98055-1219, at a cost of \$3.50 for postage and handling.

The document may be viewed on the internet at www.metrokc.gov/ddes.

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PREFACE

This document constitutes the Final Supplemental Environmental Impact Statement (Final SEIS) for the 2000 Update of King County's 1994 Comprehensive Plan.

This is a programmatic SEIS addressing the substantive changes and additions, proposed by King County, to its previous 1994 Comprehensive Plan. These changes respond to the need to address new land use issues that have arisen since 1994 as well as other long-range land use issues that have evolved and changed since that time. The scoping period for the Draft SEIS lasted from May 12 to June 18, 1999. Scoping meetings were held in Covington (May 26), Bothell (June 3), and Issaquah (June 8). Over 100 public responses were received during the scoping period. The public comment period on the Draft SEIS was from April 26 (date of issue) to June 12, 2000. A public hearing on the draft SEIS was held in Issaquah on May 24. A total of eight formal comments were received from the public during the comment period.

During the preceding 5 months, the Growth Management and Unincorporated Area Committee (GMUAC) has considered a variety of amendments to the Executive's proposed plan. This Final SEIS addresses changes that came out of this process. In most cases, however, sufficient analysis was included in the Draft SEIS to adequately address the consequences of these amendments. While the Final SEIS adds some analysis and information, it does not substantially change the analysis of significant impacts and alternatives analyzed in the Draft SEIS.

This document should be used in conjunction with the Draft SEIS to evaluate the environmental impacts of the proposal. This environmental review supplements the environmental review on the 1994 Comprehensive Plan and subsequent amendments.

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1.0 SUMMARY

1.1 PROPOSAL AND ALTERNATIVES

1.1.1 Proposed Programmatic Action

The proposed project is an update of the 1994 King County Comprehensive Plan. The update includes changes and additions to the policies of the Comprehensive Plan and the development regulations that implement the Plan. This Supplemental EIS (SEIS) reviews this update to both the policies and the development regulations. Many of these changes include edits for accuracy, housekeeping details, and minor updates to keep the Plan current. The SEIS considers the affects of only those changes to the Plan that are substantive in nature.

The Draft SEIS reviewed changes proposed by the Executive. This Final SEIS includes a review of recommended modifications to the Executive Proposal made by the Growth Management Unincorporated Areas Committee (GMUAC) of the King County Council. Responses to public comments made on the Draft SEIS are also included.

The impacts associated with the proposed Comprehensive Plan policy amendments are the same as the impacts generated by the development regulations that are proposed to implement the policy amendments. As a result, the discussion of the impacts related to the policy amendments also encompasses the impacts from the implementing regulations. In limited circumstances where appropriate, however, development regulations are also discussed separately.

These substantive changes and additions address important land use issues and challenges now and for the next several years. One issue addresses the concept of directing growth in the unincorporated urban areas. Another involves maintaining the unique character of the County's rural areas and protecting resource lands.

1.1.2 Alternatives Examined within Each Policy Category

The alternatives studied within the context of this SEIS are specific to the different policy categories that appear in the King County Comprehensive Plan 2000. These categories include: urban communities, rural and resource lands, natural environmental elements, transportation, and public facilities and utilities. The specific alternatives considered within the context of each of these categories are listed below.

1.1.2.1 *Urban Communities*

- Growth Targets
 - No Action: Growth targets based on 1992-2012 projections
 - Executive Proposal: Growth targets based on annexations and incorporations
 - GMUAC Recommendation: Same as Executive Proposal
- Average Density
 - No Action: Urban density goal is 7 to 8 homes per acre
 - Executive Proposal: Urban density goal is 8 homes per acre
 - GMUAC Recommendation: Same as No Action

- Community Action Strategies
 - No Action: Continued use of the Service and Finance Strategy
 - Executive Proposal: Initiate community action strategies planning
 - Alternative: Criteria for priority areas
 - Alternative: Implementation approaches for priority areas
 - GMUAC Recommendation: Creates new "urban retrofit" designation, otherwise same as Executive Proposal

1.1.2.2 Rural and Natural Resource Lands

- Rural Growth
 - No Action
 - Executive Proposal: Eliminate requirement for a rural phasing program
 - Alternative: Rural cap and other approaches to limiting growth
 - GMUAC Recommendation: Similar to Executive Proposal, but fewer acres are downzoned
- Rural Character and Land Uses
 - No Action
 - Executive Proposal: Enhance the functioning of the rural area by emphasizing its character
 - Alternative: The location of schools and other non-residential uses
 - GMUAC Recommendation: Similar to Executive Proposal with additional equestrian policies
- Rural Resource Activities
 - No Action
 - Executive Proposal: Strengthen priority for the preservation of forest and agricultural lands
 - GMUAC Recommendation: Same as Executive Proposal.
- Resource Lands
 - No Action
 - Executive Proposal: Limiting residential development in the Forest Production District
 - Alternative: Limiting residential development in the FPDs using a special district overlay
 - GMUAC Recommendation: Same as Executive Proposal

1.1.2.3 Natural Environment

- Air Quality/Tree Cover
 - No Action
 - Executive Proposal: Encouraging tree planting in all growth areas
 - Alternative: 65 percent tree retention for new development
 - GMUAC Recommendation: Same as Executive Proposal
- Water Resource Management
 - No Action
 - Executive Proposal: Initiate a number of watershed management measures
 - GMUAC Recommendation: Similar to Executive Proposal

- ESA Compliance and Coordination
 - No Action
 - Executive Proposal: Tri-County participation and other measures
 - Alternative: Large buffer management
 - GMUAC Recommendation: Similar to Executive Proposal, but adds policies to ensure housing capacity and growth targets
- Open Space Management
 - No Action
 - Executive Proposal: Initiate measures to streamline the process
 - GMUAC Recommendation: Same as Executive Proposal

1.1.2.4 Transportation

- County Arterial System
 - No Action
 - Executive Proposal: Regional arterial network
 - Alternative: Coordinated approach
 - GMUAC Recommendation: Same as Coordinated Approach Alternative
- Transit Development Plan Allocation Method
 - No Action
 - Executive Proposal: Subarea allocation of resources
 - Alternative: Countywide allocation of resources
 - GMUAC Recommendation: Same as No Action
- Investment Strategies for Urban Transportation
 - No Action
 - Executive Proposal: Community action strategy approach
 - Alternative: Zoning reclassification approach
 - GMUAC Recommendation: Same as No Action

1.1.2.5 Facilities and Services

- No Action: No updated measures or pipeline provisions
 - Coordinating Land Use with Services and Facilities
 - Sewer Systems
 - Water Supply
 - Pipelines
- Executive Proposal: Updated measures to provide for services and pipeline safeguards
 - Coordinating Land Use with Services and Facilities
 - Sewer Systems
 - Water Supply
 - Pipelines
- GMUAC Recommendation: Same as Executive Proposal

1.2 POTENTIAL IMPACTS, MITIGATING MEASURES, AND SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

1.2.1 Urban Land Use

1.2.1.1 Potential Impacts

Growth Targets

No Action. Growth targets are based on 1992-2012 projections and do not take into account changes in unincorporated capacity due to incorporations and annexations.

Executive Proposal. Growth targets based on an update regarding incorporations and annexations will provide an accurate guide to planning over the next several years.

GMUAC Recommendation. Impacts are the same as the Executive Proposal.

Average Density

No Action. The current urban density goal of 7 to 8 homes per acre is sufficient for planning purposes. However, the use of a range of numbers for this goal has resulted in some ambiguity in plan implementation.

Executive Proposal. An urban density goal of 8 homes per acre reduces the former ambiguity of the goal.

GMUAC Recommendation. Impacts are the same as No Action.

Community Action Strategies

No Action. This alternative will result in a continued use of the Service and Finance Strategy Map which has become outdated due to changes over the past six years.

Executive Proposal. Initiation of community action strategies is designed to fine tune the planning process to better allocate funding and resources to the areas where infrastructure improvements are most appropriate.

Alternative: Criteria for Priority Areas. This alternative would assign a weighting system to criteria for prioritizing areas for capital facility funding. The proposed criteria are, however, somewhat simplistic relative to the community action strategy approach of the Executive Proposal.

Alternative: Implementation Approaches for Priority Areas. This alternative could include any of a number of alternative options for phasing growth and prioritizing facility funding and targeting specific sub-areas for growth-related investments. These options would result in a mix of positive and negative impacts, and would likely present a more complex administrative challenge than the proposed action.

GMUAC Recommendation. This alternative introduces a new category of "urban retrofit" needs which focus on existing developed areas that do not meet current road standards. Potential impacts are the same as the Executive Proposal.

1.2.1.2 Mitigating Measures

No mitigation is needed for the proposed action.

1.2.1.3 Significant Unavoidable Adverse Impacts

There are no significant unavoidable impacts associated with the Executive Proposal.

1.2.2 Rural and Natural Resource Lands

1.2.2.1 Potential Impacts

Rural Growth

No Action. Existing policies would remain in place and King County would continue to implement the regulatory actions described in the 1996 Rural Phasing Report.

Executive Proposal. This alternative would eliminate the requirement for a rural phasing program and effectively reduce buildout capacity in the rural area primarily through downzoning.

Alternative: Institute a Rural Cap and Other Approaches to Limiting Growth. This alternative to impose an absolute cap on the amount of growth that could occur in the rural area. However, this approach would not address the rate of rural growth unless modified. Other approaches to limiting growth could include temporary moratoria.

GMUAC Recommendation. Resulting impacts are similar to those anticipated for the Executive Proposal, but fewer acres are downzoned.

Rural Character and Land Uses

No Action. Continuation of existing policies would discourage urban level services in the rural areas.

Executive Proposal. The proposed action is intended to enhance the functioning of the rural area by emphasizing its character, giving higher priority to some rural land uses, and controlling some incompatible activities more effectively.

Alternative: The Location of Schools and Other Non-Residential Uses. The need to site schools and other non-residential uses in rural areas could be addressed using a variety of potential approaches with minimal impact to rural character.

GMUAC Recommendation. Additional policies would result in impacts similar to those anticipated for the Executive Proposal.

Rural Resource Activities

No Action. Rural resource activities will be maintained as defined in the 1994 King County Comprehensive Plan.

Executive Proposal. The preservation of forest and agricultural lands will be strengthened as a priority in County planning.

GMUAC Recommendation. Impacts are similar to the Executive Proposal.

Resource Lands

No Action. Regulating the use of resource lands will continue to be accomplished primarily through low density zoning.

Executive Proposal. New residential development in the Forest Production District would be limited to lots that were legally created on or before January 1, 2000.

Alternative: Limiting Residential Development in the FPDs Using a Special District Overlay. This alternative would limit potential impacts to the rural character of forest lands through the use of special district overlays to help focus and contain residential development in these areas.

GMUAC Recommendation. Impacts are similar as the Executive Proposal.

1.2.2.2 Mitigating Measures

No mitigation is required for any aspects of the Executive Proposal.

1.2.2.3 Significant Unavoidable Adverse Impacts

There are no significant unavoidable adverse impacts associated with the proposed action.

1.2.3 Natural Environment

1.2.3.1 Potential Impacts

Air Quality /Tree Cover

No Action. Current policy does not address the linkage between trees and air quality.

Executive Proposal. The proposed action encourages tree planting in all growth areas. This policy would result in some of the air quality benefits associated with tree retention.

Alternative: 65 Percent Tree Retention for New Development. This alternative would require tree retention on all new development sites. As a result, air quality benefits attributable to trees would be more assured.

GMUAC Recommendation. Impacts are similar to those anticipated for the Executive Proposal.

Water Resource Management

No Action. Existing policy embodies a number of watershed management policies and provisions that are reflective of the state of water issues and challenges that existed in the mid-1990s.

Executive Proposal. Initiating the watershed management measures in the Comprehensive Plan 2000 is integral to a coordinated approach to resource and habitat management which will benefit threatened salmonid species and critical water reserves.

GMUAC Recommendation. Standards for clearing and impervious surfaces would approximate impacts of the Executive Proposal.

ESA Compliance and Coordination

No Action. Existing policies do not specifically address the issue of listed salmonids and so do not provide a policy context for complying with ESA.

Executive Proposal. Tri-County participation and other measures provide the major portion of an integrated policy response to ESA issues. As a result, the County has established a much needed policy context for compliance with land use restrictions imposed by the federal listings.

Alternative: Large Buffer Management. This alternative would establish a large uniform buffer (in the range of 200 to 300 feet) along all shorelines for the purposes of excluding all development that might affect water quality, and consequently, salmonid habitat. This plan would lack the flexibility, however, to deal with the diversity of shoreline types and uses that would be required to respond to salmonid habitat requirements.

GMUAC Recommendation. New policies were included regarding no net loss of housing capacity and meeting 2012 growth targets. However, ESA requirements would still apply. Impacts are similar to those anticipated under the Executive Proposal.

Open Space Management

No Action. Current policies are complex and have led to little participation in this potentially viable program.

Executive Proposal. Initiating the measures to streamline the process, proposed in the Comprehensive Plan 2000, could result in more effective use, management, and (ultimately) success of the program.

GMUAC Recommendation. Impacts are similar to those of the Executive Proposal.

1.2.3.2 Mitigating Measures

No mitigating measures are necessary under the proposed action for each of the environmental elements analyzed.

1.2.3.3 *Significant Unavoidable Adverse Impacts*

There are no significant unavoidable adverse impacts associated specifically with the proposed action.

1.2.4 **Transportation**

1.2.4.1 *Potential Impacts*

County Arterial System

No Action. The No Action alternative represents a continuation of the County's traditional role of maintaining and improving transportation facilities in the County on an *ad hoc* basis with the involvement of local jurisdictions. This approach would lack the singular regional vision necessary for effective future growth planning.

Executive Proposal. The proposed Regional Arterial Network approach would focus resources and funding on key transportation corridors for the efficient movement of automobiles, HOVs, non-motorized travelers, transit, and freight. This alternative will likely result in the development of "seamless" travel corridors.

Alternative: Coordinated Approach. This approach would increase interjurisdictional cooperation on transportation improvements, but would lack the commitment and accountability of a regional vision for transportation improvements.

GMUAC Recommendation. Impacts are similar to those anticipated for the Coordinated Approach Alternative.

Transit Development Plan Allocation Method

No Action. Current planning uses an allocation formula where new sources of transit funding are allocated by subarea, subject to changes in projected population. However, this method does not always result in cost-effective allocations of resources since projected population increases may not always reach densities high enough to support transit.

Executive Proposal. Subarea allocation of resources would place more transit funding in areas where policies, codes, and plans support transit, while keeping the existing subarea distribution structure in place.

Alternative: Countywide Allocation of Resources. This alternative would focus transit funding on communities that are willing to provide transit-supportive improvements and land uses. However, this approach may result in disparities in service between different communities.

GMUAC Recommendation. Impacts are similar to No Action.

Investment Strategies for Urban Transportation

No Action. Continuing the existing Service and Finance and Transportation Service Strategy to direct public facility investment would likely result in spreading out limited transportation funds to ineffectual levels.

Executive Proposal. Community action strategy approach would improve the relationship between transportation improvements and desired land uses.

Alternative: Zoning Reclassification Approach. This alternative would result in effects similar to those of the Executive Proposal.

GMUAC Recommendation. Impacts are similar to the Executive Proposal. Implementation issues with transportation allocation and concurrency management need to be addressed to meet stated transportation and land use policies.

1.2.4.2 *Mitigating Measures*

There are no impacts identified for which mitigation would be needed. Additional efforts could, however, involve strategies for increasing local and public involvement in the planning process.

1.2.4.3 *Significant Unavoidable Adverse Impacts*

No significant unavoidable adverse impacts relating to transportation have been identified for the King County Comprehensive Plan 2000.

1.2.5 **Facilities and Utilities**

1.2.5.1 *Potential Impacts*

No Action: No updated measures or pipeline provisions

Coordinating land use with services and facilities would continue to adequately provide for sewer, water, and other service and utility needs. There would be no policy statement reflecting County concern for pipeline safety.

Executive Proposal: Updated measures to provide for services and pipeline safeguards

The proposed action updates policy language with regard to County efforts to coordinate land use with service and facility needs. Pipeline safety is specifically called out as a policy focus.

GMUAC Recommendation: Impacts are similar to those anticipated for the Executive Proposal.

1.2.5.2 *Mitigating Measures*

No mitigation is required for this portion of the proposed action.

1.2.5.3 Significant Unavoidable Adverse Impacts

There are no significant unavoidable adverse impacts associated with the proposed action.

2.0 SUPPLEMENTAL ANALYSIS OF GMUAC RECOMMENDATION

This section addresses recommendations developed by the Growth Management and Unincorporated Area Committee (GMUAC) of the King County Council. While this section adds some analysis and information, it does not substantially change the analysis of significant impacts and alternatives analyzed in the Draft SEIS. No significant adverse impacts have been identified in the King County Comprehensive Plan 2000.

2.1 URBAN COMMUNITIES

1. **Growth Targets.** The GMUAC Recommendation (U-110) would not result in any change in adopted growth targets and would not generate significant adverse impacts. It is the same as the Executive Proposal and would revise the growth targets in policy U-110 to reflect growth, incorporations and annexations that have occurred since the Comprehensive Plan was adopted.

According to data compiled by King County, the GMUAC Recommendation and the Executive Proposal would provide adequate capacity to accommodate forecast growth to 2012.

Land use and zoning changes proposed to be adopted following the GMUAC's review of the Executive Proposal (in conjunction with other amendments under consideration) are summarized in Appendix C. Some of the amendments would make minor adjustments to the urban growth boundary. Proposed changes affecting the Urban Area would result in a net increase in capacity of 230 dwelling units. In general, when compared to population targets, these minor changes would neither significantly alter existing capacity in the urban area, nor significantly alter the land use pattern set by the 1994 Comprehensive Plan. In addition, much of the land being changed from rural designations to urban designations is being placed in open space use and/or established as urban separators, and as a result are not expected to generate development impacts. Any specific impacts associated with development of parcels affected by land use and zoning amendments will be addressed through project level review. No significant adverse environmental impacts are associated with these land use and zoning amendments.

2. **Average Density.** The GMUAC Recommendation (U-114) would not result in any change in the adopted target for average density. It would maintain the existing language in the Plan policy, rather than the wording change contained in the Executive Proposal. Impacts would be the same as identified for No Action in the Draft SEIS. Any lack of clarity regarding how the policy is intended to be applied would continue.
3. **Community Action Strategies.** The GMUAC Recommendation would slightly modify the CAS criteria priorities to guide spending for transportation projects. The recommendation is substantially the same as the Executive Proposal in terms of overall approach. Overall priorities would also be the same: operational and safety improvements would have the highest priority and new capacity projects the lowest priority. Similarly, the criteria used to prioritize areas are the same: future growth potential, water and sewer availability, transit

availability, affordable housing, existing traffic congestion, and the ratio of cost of unfunded capacity projects to future residential units.

The GMUAC Recommendation would create a new category of "urban retrofit" needs, which are focused on existing developed areas which do not meet current road standards. Priorities are shown in Appendix D.

Like the Executive Proposal, the GMUAC Recommendation is intended to better coordinate land use with capital facilities.

4. **Implementation Issues.** The GMUAC Recommendation would revert to implementation approaches used for the No Action alternative.

2.2 RURAL & NATURAL RESOURCE LANDS

1. **Rural Growth.** With the exception of policies related to application of zoning, the GMUAC recommendation is similar to the Executive Proposal. Comprehensive Plan policy anticipates the possibility of limiting growth in the Rural Area, but would not do so as part of the 2000 Update.

The GMUAC Recommendation would maintain the existing zoning of approximately 38,606 acres in the Rural Area proposed to be downzoned in the Executive proposal. The downzone of approximately 3,148 acres on Vashon Island would occur. The downzone will reduce capacity in the Rural Area. However, the overall GMUAC recommendation on downzones would provide greater capacity in the Rural Area than the Executive proposal, and less capacity than the No Action alternative. Other land use and zoning amendments, which along with the Vashon downzone are included in Appendix C, would add a slight amount of capacity to the Rural Area. These amendments do not significantly alter the land use pattern set by the 1994 Comprehensive Plan. There are no significant adverse environmental impacts associated with the land use and zoning amendments that affect the Rural Area.

2. **Rural Character and Land Uses.** Like the Executive Proposal, the GMUAC Recommendation would not make significant changes to the basic pattern of land use in the Rural Area and would not generate significant adverse environmental impacts. Provisions regarding the location of public schools (R-223) are the same as the Executive Proposal.

The addition of a concurrency requirement (R-203) and design standards (R-228-229) for rural subdivisions would help maintain rural character.

The GMUAC Recommendation includes additional policies (R-111-115) and development regulations (KCC 21A.14) intended to maintain equestrian trails and safe equestrian travel as an element of a rural character and lifestyle. Equestrian communities are identified on a map. Proposed policies state the County's policy to protect existing equestrian uses and trail links, and to update and/or provide road design and construction standards to include equestrian and multiple-use trails. Additional trails could create a potential for increased

conflicts between equestrians and motorists. It is assumed that safety issues would be addressed in any new standards. The specific impacts of locating new trails, and potential impacts to environmentally sensitive areas, would be addressed in the context of site specific proposals.

3. **Rural Resource Activities.** The GMUAC Recommendation is, with some minor wording changes, the same as the Executive Proposal.
4. **Resource Lands.** The GMUAC Recommendation for resource lands is the same as the Executive Proposal.

2.3 NATURAL ENVIRONMENT

1. **Air Quality Tree Cover.** The GMUAC Recommendation is the same the Executive Proposal.
2. **Water Resource Management.** The term "watershed-based salmon conservation plans" and "Water Resource Inventory Area plans" are used interchangeably. A new policy requires study of surface and groundwater resources on Vashon-Maury Island.
3. **ESA Compliance and Coordination.** Two new policies were introduced that ensure (1) no net loss of housing capacity due to the ESA and (2) the ability to accommodate the 2012 growth targets in compliance with ESA within urban areas of unincorporated King County. Environmental impacts are not significant if future implementation measures comply with federal ESA regulations.
4. **Open Space Management.** Minor modifications were made to policy language.

2.4 TRANSPORTATION

1. **County Arterial System.** GMUAC Recommendations for RAN are equivalent to the DSEIS's "Coordinated Approach" alternative. The County would still develop a RAN system, but would emphasize cooperation and coordination with local jurisdictions to achieve its development.
2. **Transit Development Plan Allocation Method.** The GMUAC Recommendation is the same as the No Action alternative. This would continue to distribute all funds to each of the three funding subareas for allocation based on a population formula. Development of transit services within each subarea would be distributed based on a collaborative process involving public surveys, workshops, community sounding boards, advisory boards, and local jurisdictions.
3. **Investment Strategies for Urban Transportation.** See Community Action Strategies discussion on page 2-1.

2.5 FACILITIES AND UTILITIES

The GMUAC Recommendation is the same as the Executive Proposal.

3.0 RESPONSES TO PUBLIC COMMENTS TO THE DRAFT SEIS

This section includes responses to the comments received during the public comment period on the Draft SEIS. All comments were received in written form between April 26 and June 12, 2000. This includes comments received during a public comment hearing on the Draft SEIS, held in Issaquah on May 24, 2000. Each comment letter is followed by specific appropriate responses to the comments made.

Maxine Keesling
15241 N.E. 153rd
Woodinville, WA 98072
(425) 483-8523

May 24, 2000

TO KING COUNTY: RE: Complan 2000 DSEIS of 4-26-2000

I'm choosing one concept to illustrate the inadequacy of the DSEIS as a document to inform and guide decisions; That concept is retention/restoration of 65% of tree cover on all new development sites. (DEVELOPMENT has been defined by King County as anything requiring a permit, including clearing brush.)

1. The stated reason for tree retention/planting is to promote air quality. We have no air quality problems. We even meet the EPA's new 1997 standards which are so tough the United States Supreme Court is currently considering whether to throw them out.

2. The page 5-3 table shows "Biogenic" natural emissions from trees as the third-highest source of volatile organic compounds (VOCs), which contribute to the formation of ozone. (p. 5-6)

1 3. There were no ^{air quality} problems even in 1993 when we had 142.7 tons of PM₁₀ emissions from 282 King County burning permits. (Burning permits in 1998 resulted in 17.3 tons from 91 burning permits. Speaking of outdoor burning, Complan Policy E-110 calls for curbside yard waste collection in the Rural Area, instead of the spring and fall burning we are now allowed. Since current rural burning isn't polluting the air significantly, why add all those truck-hauling trips to our highways, at the homeowners' extra cost??) AIR QUALITY HERE IS NOWHERE NEAR BROKE - WHAT ARE WE FIXING?

4. Page 5-26 speaks to trees as replenishing water tables. That's contrary to state water hydrologists' statements that clearcuts properly done contribute to the replenishment of ground water. The SEIS writers have forgotten that tree canopies intercept rain and that tree systems transpire huge amounts of water into the air.

2 5. The Issaquah Creek Basin was burdened with the 65% tree-retention requirement several years ago. The excuse then had nothing to do with air quality; it had to do with flood control. (The reasons why trees do not contribute to groundwater recharge are the same reasons why they help control flooding. A lot of the water never reaches the ground.

6. When page 5-26 says "no significant adverse impacts associated with (65% Tree Retention for New Development) are anticipated," the authors of that statement overlook state SEPA requirements for analysis of social and economic impacts. (BARRIE v. KITSAP COUNTY 93 Wn2d 843)

a. The Executive's 3/5/97 CONVERSION GUIDELINES report for p-suffix conditions to be carried over into current regulations recommended against retaining p-suffix tree-retention requirements because "The Title 21A landscaping and code requirements represent the most recent policy decision for a county-wide standard. The significant trees requirement was specifically defeated . . ." The Council vote was 12-1, with Brian Derdowski voting against the majority. Cynthia Sullivan said an economic analysis showed forcing developers to keep or replant established trees would increase from \$600 to \$1,500 for every apartment, townhouse or condominium built in unincorporated King County. (from a 2-1-94 news article)

3 b. The DSEIS should analyze the social impacts on individuals and on traditional Rural Character of tree retention's effectively eliminating new green fields and horticultural activities from the Rural Area. Livestock raising and farming are healthful, traditional rural activities, and their prohibition needs analysis.

c. The Executive Proposed King County Park, Recreation & Open Space Plan of May 1995 cited \$275 per acre "to maintain passive and natural lands." That, too, should be analyzed in connection with County acquisitions and private open space tracts required as a condition of "development".

Maxine Keesling

RESPONSE TO COMMENTS FROM MAXINE KEESLING:

1. Thank you for your comments regarding the Natural Resources Alternative: 65% Tree Retention for New Development. However, the option being recommended in the DSEIS under the Natural Resources section is the Executive Proposal--which encourages tree planting in all growth areas.
2. Comment acknowledged.
3. The Draft SEIS recommends adoption of the Executive Proposal not the 65% Tree Retention For New Development alternative. This Final SEIS addresses the GMUAC Recommendations to that Proposal. These recommendations are consistent with the Executive Proposal in encouraging, but not requiring the planting of trees.



Jesse Tanner, Mayor

CITY OF RENTON

Planning/Building/Public Works Department

Gregg Zimmerman P.E., Administrator

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K.C.D.D.E.S.

June 9, 2000

King County Land Use Services Division
900 Oakesdale Ave. SW
Renton, WA 98055-1219

**SUBJECT: DRAFT SEIS FOR KING COUNTY COMPREHENSIVE PLAN 2000 AND
IMPLEMENTING DEVELOPMENT REGULATIONS - CITY OF
RENTON COMMENTS ON TRANSPORTATION-RELATED ISSUES
(ONLY)**

Dear Sir or Madam:

Thank you for providing us the opportunity of reviewing the Draft Supplemental Environmental Impact Statement for King County Comprehensive Plan 2000 and Implementing Development Regulations. This letter provides comments from the City of Renton on transportation-related issues only. Letters from the City of Renton pertaining to other aspects of the document may be forthcoming. Our transportation related comments are included in the attached memo. Thank you for your consideration.

Sincerely,

Gregg Zimmerman, Administrator
Planning/Building/Public Works Administrator

cc: Jay Covington
Sue Carlson
Sandra Meyer
Jana Hanson

CITY OF RENTON
PLANNING/BUILDING/PUBLIC WORKS
MEMORANDUM

DATE: June 8, 2000
TO: Gregg Zimmerman
FROM: Sandra Meyer
Subject: King County Comprehensive Plan 2000
Draft Supplemental Environmental Impact Statement (DSEIS)

The Transportation Systems Division has the following comments regarding the DSEIS for the King County Comprehensive Plan 2000:

- 1
- Executive Proposal: Regional Arterial Network, discussed in Chapter 6, Transportation (page 6-14) of the DSEIS proposes the development of a Regional Arterial Network (RAN) and that King County assume the leadership in identifying projects, funding priorities and funding strategies for RAN improvements. We have previously had several discussions with King County staff regarding this proposal and recognize that the RAN program represents an effort to coordinate and improve the efficiency of transportation facility planning among jurisdictions. However, we have concerns regarding how the RAN proposal would be implemented. We are also concerned: that this proposal could lead to the creation of another "ad hoc" forum to define the regional arterial network, identify improvement projects and address funding priorities, which could be counter-productive to the current and future efforts of already established regional forums; that all the projects of regional significance would not be included in the RAN program; and, that another tier or layer of funding needs would be created which could siphon or dilute existing or future funding from Federal, State and regional agencies that is needed by local jurisdictions to address their transportation needs.

2

Because of our concerns, we prefer the Alternative: Coordinated Approach presented in the DSEIS (page 6-14) and urge that new and update polices (T-101, T-120, T-122, etc.) and text in King County" Comprehensive Plan 2000 be revised to reflect this alternative proposal.

- 3
- Regarding Executive Proposal: Community Action Strategies (CAS), discussed in Chapter 6, Transportation (page 6-18) of the DSEIS, we question the low priority ranking for the East Renton subarea in light of the recent number of current and proposed development projects in and adjacent to this subarea. Also, the text in the DSEIS, and appropriate policies and/or text in the King County Comprehensive Plan 2000, should include clarification that an improvement serving a CAS subarea does not necessarily need to be located within the subarea.

RESPONSE TO COMMENTS FROM THE CITY OF RENTON:

1. While the exact nature of the RAN program has yet to be finalized, jurisdictions would be an integral part of identifying and planning the RAN. The RAN would build on the efforts of existing regional forums to form a united vision of regional arterial development (T-112) and to participate in the identification, prioritization and implementation of these arterial improvements. The County has helped lead the development of the RAN concept and will work cooperatively with jurisdictions in identifying projects, priorities, and funding. Any regional function will recognize the roles and responsibilities of cities and other governments.

The possibility that some regional arterials would not be included into the RAN system will be addressed through adoption of each city's RAN. The County has worked with cities to identify RAN corridors based on a set of criteria to determine "regional significance" and a system approach. Obviously, the RAN's efforts would focus on those arterials that serve a variety of purposes such as transit, bicycles, and truck traffic and where improvements are most likely to result in improved traffic flow (T-113).

The intent of the RAN is to enter into funding partnerships with local jurisdictions, allowing the County, State, and cities to pool and coordinate resources to complete projects that have a mutual benefit, not to divert funding from local improvements. Improved coordination and system efficiencies will help enhance performance of the transportation system. In addition the RAN will help identify new project needs and create a greater awareness for funding.

2. The GMUAC Recommendation is equivalent to the coordinated approach alternative.
3. According to the Executive proposed Comprehensive Plan and the GMUAC Recommendation, the East Renton area is ranked a "medium priority," based on the County's CAS system. The ranking is an indication of the relative desirability of supporting development (through roadway capacity improvements) in that particular subarea. Rankings are based on a variety of criteria including: future growth potential, water and sewer availability, availability of transit services, affordable housing, job availability, existing traffic conditions, and the cost of needed capacity improvements to the number of future residential units (U-606). The "medium" priority ranking for East Renton is based on the area's development as compared to other areas, not on the number of existing or proposed development projects in the subarea. In all cases, the County will complete existing and pipeline project needs (U-607) for all subareas.

The second City contention is that the County should clarify that roadway improvements made outside of a subarea can benefit the subarea. While the County's policies do not specifically recognize this issue, they neither preclude it. Policy T-501 promotes the coordination and prioritization of improvements that meet countywide objectives. In addition, the intent of the RAN system is to identify and fund improvements along

corridors that will provide the highest benefit to regional travel irrespective of jurisdictional boundaries.

The GMUAC Recommendation is to pursue the coordinated approach alternative. Revised rankings for geographic sub-areas are shown in Appendix D of the Final SEIS.

COMPLAN2000, EISCOMMENT

From: Snyder, Kelly[SMTTP:kSnyder@rothhill.com]
Sent: Monday, June 12, 2000 10:45 AM
To: EIS 2000 Comp Plan Comments (E-mail)
Cc: #GA READER; Hill, Greg; Fisher, Tony; Larry Bradbury (E-mail)
Subject: King County 2000 Comprehensive Plan SEIS

This e-mail message is a privileged and confidential communication and is transmitted for the exclusive use of the addressee. This communication may not be copied or disseminated except as directed by the sender or addressee. If you receive this communication in error, do not view the content, and please notify the sender immediately by telephone at (425) 869-9448.

Barbara Heavey,

I have reviewed the King County 2000 Comprehensive Plan SEIS on behalf of King County Water District #111 .

Section 7.1.2.3 states in part, "Several water systems, including the Covington Water District, King County Water District 111, Sammamish Plateau Water and Sewer District and King County Water District 19, are at service capacity and have declared moratoria to prevent any further connections."

The information regarding King County Water District 111 being at service capacity and having declared moratoria to prevent any further connections is inaccurate. The District was briefly in a moratorium but isn't any longer and hasn't been for several years. If you need additional information on this subject, it is available in the District's approved 1997 Water Comprehensive Plan or we can provide such information upon request.

The District requests the SEIS text be modified or amended by removing King County Water District 111 from paragraph 7.1.2.3.

Thank you for your attention to this matter.

If you have any questions, please contact me at 425-869-9448 or Larry Bradbury, King County Water District #111 District Manager at 253-631-3770.

Thank You,

Kelly Snyder
Government Affairs Liaison

Roth Hill Engineering Partners, Inc.

Providing Public Works Solutions in:

Sanitary Sewer	Land Surveying
Water Systems	Street Design
Government Affairs	Municipal Services
Storm Drainage	Project Permitting
Regulatory Compliance	

Tel. 425.869.9448 / 206.682.7426
Fax 425.869.1190
14450 NE 29th Pl, Suite 101
Bellevue, Washington 98007

RESPONSE TO COMMENTS FROM KELLY SNYDER – ROTH HILL ENGINEERING:

Thank you for your comment regarding the capacity of Water District 111, which is hereby noted and incorporated in the EIS.

**MR. AND MRS. FREDERICK M. ISAAC
116 - 217TH AVENUE, NE
REDMOND, WA 98053-7054
TELEPHONE 425.592.2543
FAX 425.592.5339
E-MAIL: FIZIKZ17@MSN.COM**

Comments on Executive-Recommended
King County Comprehensive Plan 2000

This transmits our objections to the proposed Plan changes.

There is no compelling case for downzoning of certain portions of the rural area. According to the County's own reports, new residential units in the rural area have increased only 1.5% over the past eight years and formal lot development and short plat lot development have decreased 90% and 76%, respectively.

The Plan makes a argument for the negative effects of development in the rural area and states that residential development begets more residential development. Numerous studies have demonstrated that the extension of infrastructure and services - major roads, public transportation, water, sewerage - encourages development, not low density housing on multi-acre parcels under the present zoning. And while the effects of runaway development are discussed, there is not a mention of the effect the downzoning will have on the individual property owner, the "little man or woman" who has purchased or inherited a piece of property as an investment or to build a dream home, only to find the County is about to exercise their governmental powers to deny them their rights without compensation.

I find it absolutely incredible that the County could downzone a piece of property, diminishing its value or use and not have any responsibility for compensation. This is pure and simple a taking, no different than a public agency acquiring easements for utility or highway easements, all of which are compensated. Most of the people I know do not want compensation, they just want to be left alone to use their property as they planned and intended!

The Executive proposal has dropped a huge burden on many County citizens. Faced with an unanticipated and serious impact on their property, they must spend time and money to hire lawyers and other people to represent them just to stay even! This is unfair. Must we go through this every four years?

Frederick M. Isaac
Judith L. Isaac

June 11, 2000

COMPLAN2000, EISCOMMENT



tech.gif

Please see attached for our comments. I have also included them verbatim below.
Thank you,
Frederick M. and Judith L. Isaac

Comments on Executive-Recommended King County Comprehensive Plan 2000

This transmits our objections to the proposed Plan changes.

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Frederick M. Isaac

Judith L. Isaac

116-217th Ave, NE

Redmond, WA 98053

June 11, 2000

RESPONSE TO COMMENTS FROM MR. & MRS. FREDERICK ISAAC:

You note correctly that growth has apparently slowed recently in King County's Rural Area. However, the data also shows that growth has occurred at a faster rate than anticipated. The Draft SEIS points out possible impacts associated with high levels or a rapid rate of rural growth.

The Draft SEIS does not discuss the impacts of downzoning of this property, but this does not imply that these are not significant issues. The economic effects of land use decisions and similar considerations are not environmental issues and are not appropriate for discussion in SEPA documents; please refer to the State SEPA Rules (WAC 197-11-448). These issues may be considered by the decision maker, however, in determining a course of action. State and federal law provide remedies for illegal "takings" of private property; this issue is, similarly, beyond the scope of an EIS.

Please note that the GMUAC Recommendation would, if adopted, eliminate the rural downzoning contained in the Executive Proposal, except for Vashon Island.

KCCP20EE.R01.CMR.05-24-2000

**King County Comprehensive Plan 2000
R-120 RA -2.5 Zoning**

Conrad Roseburg

**106 165th Ave. S. E.
Bellevue, WA 98008**

**King County Comprehensive Plan 2000
R-120 RA -2.5 Zoning**

To: King County Executive Committee *& Council*

**Subject: King County Comprehensive Plan 2000
Executive Recommended
Dated March 1, 2000
Page 3-7
Chapter 3 B. Rural Densities and Development
R-120 AR-2.5 Zoning**

**King County Comprehensive Plan 2000
R-120 RA -2.5 Zoning**

I am concerned as:

- **As a voter**
- **As a tax payer**
- **As a property owner**
- **And as a citizen**

That King County is taking our long held property rights without some equitable adjustment.

I request fair and equitable treatment in the AR - 2.5 zoning requirements relative to other King County urban and rural zoning requirements.

**King County Comprehensive Plan 2000
R-120 RA -2.5 Zoning**

I request that the executive committee change the propose wording of R-120 requirements (including KCC 21A.12.030, KCCP Policy R-207 and others) as noted on the following page:

**King County Comprehensive Plan 2000
R-120 RA -2.5 Zoning**

R-120

The RA 2.5 zone has generally been applied to rural areas with an existing pattern of lots below five acres in size that were created prior to the adoption of the 1994 Comprehensive Plan. These smaller lots may still be developed individually or combined, provided that applicable standards for sewage disposal, environmental protection, water supply, roads and rural fire protection can be met. A subdivision at a density of one home per 2.5 acres shall only be permitted: (1) Through the transfer of development credits from property in the designated Rural Forest Focus Areas or (2) The property is 75 percent bordered by lots already subdivided to a density of less than five acres per lot or (3) The property is surrounded on at least three sides by existing lots of less than five acres in size.

RESPONSE TO COMMENTS FROM CONRAD ROSEBURG:

Page 3. Your comment regarding property rights is acknowledged. State and federal law provide remedies for illegal "takings" of private property. Such issues are beyond the scope of an EIS. Please refer to the SEPA Rules, WAC 197-11-448.

Page 4. Thank you for your suggestion regarding the Comprehensive Plan's policy regarding the RA-2.5 zone (R-207). Numerous decisions of the Central Puget Sound Growth Management Hearings Board concluded that 2.5 acres per dwelling unit is not an appropriate rural density; counties cannot allow rural sprawl in the future merely because it occurred in the past.

32633 SE 341 Street
Palmer, WA 98051

Barbara Heavey, Senior Planner
Landuse Services Division
King County DDES
900 Oakdale Ave SW
Renton, WA 98055-1219

June 6, 2000

Dear Ms. Heavey:

Thank you for taking the time to answer our questions on the phone. You were extremely helpful and we appreciate your taking our concerns seriously.

Enclosed are our comments to the Draft SEIS prepared for the King County Comprehensive Plan 2000. We believe that the Draft SEIS does not adequately address alternatives or impacts in the Forest Production District (FPD). We are primarily concerned about **existing, already developed residential uses** in the FPD. Our concern is NOT about future growth or undeveloped existing lots; the Comp Plan EIS does address some of those issues already.

We would be interested in understanding the technical basis for the alternatives included in the DEIS. The technical basis that needs public review includes:

- Existing Lot Pattern and Ownership: What percentage of the FPD is in lots less than 80 acres and how many are already in residential use? What is the breakdown of lot sizes? How many include residences or other structures? How close are they to the FPD boundary? What is the ownership pattern? What other patterns exist in the lot pattern? How many were created from land segregation versus older plats or other mechanisms? We believe that you need to acknowledge the existence, lot pattern and quantity (percentage of the 800,000 forest acres) that are not blocks of continuous commercial forest.
- Impact Analysis: What is the environmental, and economic impact of regulating existing residential uses in the FPD as commercial forestry? What is the economic analysis of these proposals? How many lots does this proposal affect? What is economic value of these lots? What percentage of these residential use lots (number, sizes, location and value) is in commercial timber now?
- Associated Studies: In September 1998, the Council passed Ordinance #13275 adopting the Rural Forest Demonstration Project. This project was designed to be a pilot effort to explore innovative techniques for dealing with residential uses in the FPD, recognizing that they are no longer commercially viable forestry. The ordinance specifically asks for "an inventory of properties within King County with similar characteristics to the rural forest demonstration project site and an analysis of the potential effects of development of those properties under the same requirements as the demonstration project". How did these results affect your alternatives?

In addition, we would like to see these additional alternatives developed as part of this environmental review.

Thanks Barbara!

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1) Take existing residential developed uses out of the FPD: The SEIS needs to analyze taking the existing residential lots, which are not commercial forestry out of the FPD. The analysis could establish a range (ie. adjacent to or within some distance from FPD line) upon which the FPD Boundary would move. In particular, the SEIS does not address (e.g. near Cumberland, WA) the 20 acre segregated lots near the FPD boundary that will never be and are not commercial forestry. They would be better served as being regulated as rural 20-acre lots.

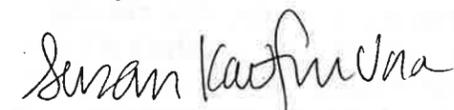
2) Keep Residential uses in the FPD But Regulate them as Rural Not Commercial Forestry: It does not analyze a special district overlay in the FPD for **only** existing, already built residential uses in the FPD. This overlay could regulate existing residential uses as rural lands (which they are) but require forest management plans or other mechanisms to ensure compatibility with commercial forestry uses. The overlay could reflect the actual lot pattern- allowing 20-acre zoning.

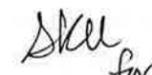
3) Buffer Management - Keeping the FPD Line in Place: King County planning staff have said in public meetings that the "domino effect" is of concern to them so they want to use residential lots in or near the FPD line to act as a buffer between commercial forestry and other zoning. Instead of moving the FPD line, regulate the "buffer existing of residential lots" in the FPD as rural- NOT as commercial forestry which they are not. The current document does not analyze the impacts of treating existing residential lands as a buffer in the FPD rather than commercial forestry.

5) Move the FPD line to reflect TRUE Commercial forestry: The last alternative is to move the FPD line to truly reflect those lands upon which commercial forestry exists. The lands that would come out would be a mix of smaller undeveloped lots, existing development and some unviable timberlands that mostly run along the border of the FPD. This area of mixed use could be treated as rural or rural forestry and be a buffer zoning for true commercial forestry.

Thank you for the opportunity to comment. If you have any questions, please call us at (360) 886-1607.

Sincerely,


Susan Kaufman-Una


Ole Una

Cc: Councilman Kent Pullen



King County

Department of Development and Environmental Services

Notice of Public Meeting and availability of Draft Supplemental Environmental Impact Statement for King County Comprehensive Plan 2000 And Implementing Development Regulations

Date of Issuance: April 26, 2000

Project: The proposed programmatic action is a year 2000 update of King County's 1994 Comprehensive Plan. This update includes proposed changes and additions to land use policies as well as associated proposed regulatory, land use, and zoning code changes.

Location: All of unincorporated King County

Copies of the Draft Supplemental Environmental Impact Statement (DSEIS) may be obtained at the King County Department of Development and Environmental Services (DDES) in Renton during the hours of 8:30 a.m. and 4:30 p.m. Monday through Friday (Wednesdays from 10:30 a.m. to 4:30 p.m.). Copies are also available at all King County Libraries and on the Internet at www.metrokc.gov/ddes.

Copies may be requested by mail. A cost of \$3.50 for handling and postage is applied to all orders sent by mail. Please send your request, along with a check made out to King County Office of Finance to DDES at the address listed below.

Comments and Public Meeting

Any person, affected tribe, or agency may comment on the DSEIS. Written comments must be received by King County **before 4:30 PM on Monday, June 12, 2000**. **This comment period includes the 15 day extension period. No further extensions will be granted.** Comments should be sent to King County Land Use Services Division, 900 Oakesdale Avenue SW, Renton, WA 98055-1219. Comments may be submitted by email at eiscomment.2000complan@metrokc.gov. Please reference the file name when corresponding and include your name and mailing address. All comments will be published in the Final SEIS. Questions on the DSEIS should be addressed to Barbara Heavey, EIS Project Coordinator, at (206) 296-7222 or Greg Borba, Responsible Official at (206) 296-7118.

A public meeting will be held **Wednesday, May 24, 2000 from 7-9 PM at Eastside Fire and Rescue Station, 175 Newport Way NW, Issaquah**. The purpose of the meeting will be to receive oral comments on the DEIS. Written comments may also be submitted at the meeting.

RESPONSE TO COMMENTS FROM SUSAN KAUFMAN-UNA AND OLE UNA:

2nd paragraph, and page 2. Thank you for your suggestions regarding additional alternatives for addressing issues within the Forest Production District (FPD). The SEPA Rules require that an EIS consider "reasonable" alternatives to a proposal (WAC 197-11-440(5), and 197-11-786). This rule limits both the number and range of alternatives that must be considered in an EIS. For purposes of SEPA analysis, the number and range of alternatives considered in the Draft EIS are considered adequate. Please note that the Council's GMUAC Recommendation, like the Executive Proposal, would limit residential development to lots legally created by a time certain and would require preparation of a forest management plan for new residences.

Existing Lot Pattern and Ownership, 1st bullet. King County's Forest Production District comprises 808,513 acres. 551,193 acres are in public ownership. Approximately half of the publicly owned lands (274,559 acres) is preserved as park, wilderness or watershed, while the remaining 276,634 acres are managed for forestry by the United States Forest Service and the Washington State Department of Natural Resources. There are 1536 lots/257,320 acres of vacant, privately-owned land in the FPD. Of those 1536 lots, 558 are 20 acres or smaller in size, 509 are between 20 acres and 160 acres in size, and 469 are greater than 160 acres in size. Lots greater than 160 acres could be subdivided to create up to 2110 more lots. As of January, 2000, there were 430 improved lots of varying sizes in the FPD, and 20 additional building permits under review.

Existing improved lots are scattered throughout the FPD; pockets of residentially-developed lots can also be found east and northeast of the City of Black Diamond. Maps of the existing lot pattern and developed lots can be viewed at the King County Department of Natural Resources, Water and Land Resources Division, and at the King County Office of Regional Policy and Planning.

Impact Analysis, 2nd bullet. The Executive Proposal and the GMUAC Recommendation would prohibit residential development on lots created after January 1, 2000, and would require a forest management plan as a condition for approval of new residential building permits on lots legally created prior to January 1, 2000. If commercial forestry is defined as the management of forest land with intent to sell timber, a forest management plan does not imply the conduct of commercial forestry. Forest management plans can also function as forest and habitat restoration plans, or as plans for commercial harvest of other forest products, such as underbrush. The proposal would not result in regulation of existing residential uses in the FPD as commercial forestry.

An EIS is focused on environmental impacts; these are identified in the Draft SEIS. The state SEPA Rules exclude economic analysis from discussion in an EIS (WAC 197-11-448), although the decision maker may consider such issues when reaching a decision. The King County Assessor's Office maintains records of properties in the FPD that are under Current Use Taxation, an indicator of forestry use. The Assessor's Office also maintains records of improved lots; however, these two data categories have not been correlated.

Associated Studies, 3rd bullet. The purpose of the Rural Forest Demonstration Project is to "test techniques to maintain long-term forestry uses in areas with a predominant parcel size of

significantly less than eighty acres which are located in proximity to residential development" (King County Code 21A.55.050 A.). The concept stated in your letter – "to explore innovative techniques for dealing with residential uses in the FPD, recognizing that they are no longer commercially viable forestry" – is incorrect. The report called for in K.C.C. 21A.55.050 J., which is to include an inventory of lands with similar characteristics to the Rural Forest Demonstration Project site, has not yet been completed.

Additional Alternatives. Numerous studies and observation of forest land conversion throughout the northwest indicate that subdivision of land and the introduction of residential uses create pressures that operate against the maintenance of the forest land base and the continuation of active forestry. The Executive Proposal and the GMUAC Recommendation limit new residential development in the FPD to prevent conflicts between residential uses and resource activities, and to maintain large forested tracts.

A number of alternatives were considered in developing the Executive Proposal. These were based on approaches to forestland management in several western states, and were evaluated as to how each would apply to the current circumstances within King County's designated FPD. Options included:

1. Apply a special overlay district to pockets of small properties within the FPD, and allow new residential development only within those areas included in the overlay district. A sub-alternative would be to allow new residential development and some greater level of subdivision within the overlay district, similar to your suggested alternative of treating such as areas as "rural." This alternative was analyzed in the DSEIS on pages 4-11 to 4-12. This alternative was rejected for several reasons: the existing lot pattern does not lend itself to clear, obvious boundaries for a series of overlay districts. Any criteria prepared to guide the drawing of boundaries would be subject to considerable debate as adjacent property owners argued for inclusion in the overlay district, potentially resulting in much larger overlay districts. This alternative also did not accommodate the many individual, scattered small lots throughout the FPD, nor did it allow for those mid-size property owners (50 to 160 acres) who want to practice forestry and live on their land to do so.
2. Remove pockets of small lots from the FPD, and prohibit residential development on all lots within the FPD. This alternative was rejected as several of the existing pockets of small lots are not along the FPD boundary, and lands currently viable and actively managed for forestry intervene. Removing the pockets would result in unnecessary loss of forest land. In 1994, King County reported to the State that the designated FPD met the definition for forest lands of long-term significance as stated in the Growth Management (RCW 36.70A.030(8)); the circumstances of these parcels have not changed to warrant removal from the FPD.
3. Allow only lots within a set radius of existing development to develop as home sites. This technique is used in Oregon, and is very complex and subjective. The potential for development of a new home is based on a combination of factors, including the density of existing development, the distance from the existing development, and the capability of the

soil to produce timber. Implementing agencies in Oregon indicated this technique is difficult to apply and does not provide certainty to property owners.

4. Prohibit new homes anywhere in the FPD, but amend the zoning code to allow for a variance under prescribed circumstances. Similar to alternative 3 above, this would allow a property owner surrounded by or near existing development to seek a variance to the prohibition on new homes. This alternative was rejected because it would not accommodate individually owned, scattered small parcels. It is also contrary to a basic premise of the King County Code that zoning variances are used to alter standards where the application of a standard creates an undue hardship for the property owner (e.g., a set back from a roadway would preclude a home from being built); the variance process is not applicable to revisions in allowed uses.
5. Restrict development of new homes to lots 10 acres or less in size. This alternative was forwarded in the November, 1999 Public Review Draft of the King County Comprehensive Plan 2000 and received extensive public comment. Ten acres was selected as the maximum lot size for new homes as there is evidence it is typically the minimum lot size to allow sustainable forestry. The alternative assumed that most owners of parcels 10 acres or smaller purchased these parcels with the primary intent of building a home. This alternative was rejected as many property owners in the 11 to 50 acre range commented that the primary intent of their purchase was also to build a home, and as stated in alternative 1, a number of mid-size property owners intended to build their home and practice forestry.

DEARBORN & MOSS P.L.L.C.

Attorneys at Law

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K.C.D.D.E.S.

June 12, 2000

VIA FACSIMILE and FIRST CLASS MAIL

Barbara Heavey, Senior Planner
Land Use Services Division
King County Department of
Development & Environmental Services
900 Oakesdale Avenue SW
Renton, WA 98055-1219

Re: Comments on Executive Proposed King County Comprehensive Plan 2000 and DSEIS
for the Plan

Dear Ms. Heavey:

On behalf of Weyerhaeuser Company, we have reviewed the policies relating to the Forest Production District. There are two policies with which we are concerned, R-219 and R-221. Pursuant to WAC 197-11-550(1), we offer the following comments on both the DSEIS and the merits of these policies.

Policy R-219

Policy R-219 is an entirely new policy. As proposed, it would provide:

R-219 To reduce conflicts with resource uses, new residential uses in the FPD shall only be permitted on lots that were legally created on or before January 1, 2000. A forest management plan shall be required as a condition of development for any residential uses.

We support the requirement for a Forest Management Plan on those lots large enough to be managed for forestry. However, the DSEIS, related documents, and testimony before the Natural Resources, Parks and Open Space Committee demonstrate that the prohibition of residences lots created after January 1, 2000 is not necessary. Other tools are sufficient to protect the viability of the Forest Production District (FPD).

First, Policy R 219 requires a Forest management Plan as a condition of any residential use. Adding to that requirement, Policy R-220 would require not only that structures be sited in a

manner that "maintains the productivity of the district," but also site plan requirements that "prevent conflicts with forest management." The R-219 requirement for a Forest Management Plan and the requirement of R-220 complement each other. They are sufficient to ensure that a residence will not interfere with commercial forestry operations.

Second, the DSEIS explains, on page 4-5, that application of 10 and 20-acre zoning adjacent to the FPD would "prevent potential land use conflicts between resource and residential uses..." As the minimum lot size in the FDP is 80 acres, any lot created after January 1, 2000 must be at least 80 acres in size. KCC 21A.12.040 and 19A.08.040. Surely, if a 10 or 20-acre lot is sufficient to prevent potential land use conflicts between residential and resource uses, an 80-acre lot is as well, particularly given the requirement for a Forest Management Plan.

Third, in May, 1999, the County prepared an Issue Paper addressing the question of how it can best protect the viability of commercial forestry. A copy of that Issue Paper is attached. It explores several options. The first option is to allow residences when accompanied by a forest management plan. This option explains that a number of property owners outside the FPD have been successfully managing 20-acre homesites in forestry uses. Thus, there is no reason a property owner could not successfully manage larger properties within the FPD.

In fact, we are concerned that the policy, as currently written, would cause rather than minimize conflicts with commercial forestry. The DSEIS indicates on page 2-7 that there are approximately 500 lots *smaller than* 20 acres within or at the edge of the FPD. It goes on to explain:

Development of these vacant lots, over time, could create or increase conflicts with resource activities in the FPD.

Yet, it is precisely these smaller lots which Policy R-219 would allow to be developed with residential uses. We submit that allowing a residential use on larger lots will avoid such impacts.

Finally, there is no apparent need for this policy. In response to questions from the Chair of the Natural Resources, Parks, and Open Space Committee, Stephanie Warden, Director of the Office of Regional Policy and Planning conceded that there is no current problem; rather, there is only a perceived future problem. The Rural Phasing Report confirms her testimony that there is no "problem": only 40 lots were created in all Natural Resource Lands including the APD, in the 6-year period of 1990 through 1995. Rural Phasing Report, p. 17, copy attached. Nor does the DSEIS project a future problem. Rather, it explains that the Executive's proposal will not fundamentally change land use patterns. *See, e.g.,* page 2-3.

Finally, the residential prohibition will create a disincentive to own forestland in King County and will create immediate significant losses for forestland owners. Maintenance of a viable forestry industry in King County provides environmental benefits. The SEPA rules call for an

EIS to examine alternatives which can feasibly attain a proposal's objects but at a lower environmental cost. WAC 197-11-440(5)(b).

For these reasons, we believe that R-219 should be revised as follows:

R-219 To reduce conflicts with resource uses, ~~new residential uses in the FPD shall only be permitted on lots that were legally created on or before January 1, 2000.~~ A forest management plan shall be required as a condition of development for any residential uses in the FPD on lots which are twenty acres or larger.

Policy R-221

Proposed Policy R-221 is an amendment to Policy RL-204 contained in the 1994 Comprehensive Plan. The amendment is shown below in ordinance format:

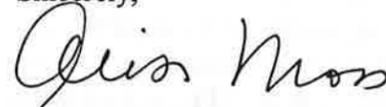
~~RL-204~~ R-221 King County ~~should~~ opposes the establishment or expansion of special purpose taxing districts and local improvement districts, and the granting or expansion of new franchises for utilities in the Forest Production District, unless demonstrated that they directly benefit forestry.

The Executive's recommended Comprehensive Plan does not explain why the amendment is proposed. Nor does the DSEIS explain this recommendation, provide any rationale for it, or analyze its impacts. We would have expected that, if this policy were, in fact, needed to protect the FPD, it would have been explained on one or more of the following pages: page 1-2 (summarizing the resource lands alternatives reviewed in the DSEIS); page 1-8 (summarizing the facilities and utilities policies); page 2-4 (describing the proposed action as it relates to facilities and services); and page 4-11 (describing in more detail the Executive's proposal for the FPD). The amendment does not appear to be warranted. Therefore, we suggest that R-221 be revised to be consistent with current policy RL-204 as follows:

R-221 King County should oppose the establishment or expansion of special purpose taxing districts and local improvement districts, ~~and the granting or expansion of new franchises for utilities in the Forest Production District, unless demonstrated that they directly benefit forestry.~~

Thank you for the opportunity to comment.

Sincerely,



Alison Moss

cc: Tom Miller
Peter Constable
Steve Ketz



King County
Comprehensive Plan 2000 Update

ISSUE PAPER

TOPIC: Commercial Forestry

ISSUE: How can King County best protect the viability of commercial forestry? King County established the Forest Production District (FPD) to identify and preserve areas of long term commercial significance for commercial forestry. With the FPD, land cannot be subdivided to smaller than 80 acre lots, and uses are limited to very low density residential and resource-based uses. What other tools can King County use to preserve forestry?

OPTIONS:

1. *Allow residential development in the FPD only when accompanied by a forest management plan.*
2. *Consider measures to prevent residential encroachment in the FPD.*
3. *Create a package of incentives or funding opportunities that will ensure the FPD remains in long-term forestry.*

BACKGROUND:

The long range vision for forestry in King County is to:

- maintain the forest land base;
- help keep resource-based industries economically viable; and
- maintain the environmental benefits of forest land -- groundwater recharge, stream and salmon protection, air quality, wildlife habitat and aesthetics.

To achieve that vision, King County established the Forest Production District in 1985. Adjustments to the boundaries of the FPD since 1985 have been minimal, and the FPD now encompasses more than 800,000 acres of forest land. Conversion to uses that are not forestry has been minimal, but residential development just outside and just within the boundaries has been occurring at a faster pace in recent years. Proliferation of residences in and adjacent to the FPD will make commercial forestry less viable and may lead to conversion to other uses. Several factors indicate an increased potential for conversion: a history of land segregation (a substantial portion of the FPD was segregated into 20 - acre lots prior to the application of the 80 - acre minimum lot size requirement); recent transfers of industrial timber land from a corporation's forestry division to its real estate branch, and the emergence of estate development on 80 - acre parcels.

DISCUSSION OF OPTIONS:

1. *Allow residential development in the FPD only when accompanied by a forest management plan.*



To prevent residential development at the edge of the FPD from causing a conversion domino effect, require maintenance of forestry in conjunction with residential development. A number of property owners outside the FPD have been successfully managing 20 acre homesites in forestry uses, and King County has been assisting property owners design plans for long term forest management. Forest management plans are now required for property owners enrolled in tax benefit programs. A forest management plan states the forestry objective and has short- and long-term strategies for protecting the ecosystem while managing forest resources. The plans prepared thus far indicate the owner's intent, but have no enforcement mechanism. Other measures could include:

- Restrict residential uses to those related to forestry, for example, on-site housing for the forest land manager or staff;
- Restrict the total number of homes that could be built in the FPD, either on an annual or permanent basis.
- Develop a set of development standards to maximize forest retention while allowing limited residential uses, for example, limited building pad and clearing.

2. *Consider measures to prevent residential encroachment in the FPD.*

Reducing the allowed density adjacent to the FPD or requiring the dedication of a forested buffer for all development adjacent to the FPD could reduce conflicts between residential and commercial forestry uses.

3. *Create a package of incentives or funding opportunities that will ensure the FPD remains in long-term forestry.*

Recognize the potential threat of conversion from forestry to other uses and work to create long-term assurance the FPD will remain in forestry. These measures may include innovative funding mechanisms and partnerships, such as the biosolids trust, forest legacy, or tax exempt bonds. Work with residential landowners to ensure they have assistance necessary to manage their forest land. Expand the purview of the rural forest commission to include vulnerable areas of the FPD. Modify the transfer of development credit program rules to base the computation of credits on existing legal lot size rather than zoning.

Phasing Growth in the Rural Area: Implementing King County Comprehensive Plan Policy R-106

**King County Office of Budget and Strategic Planning
December 31, 1996**

RURAL GROWTH TRENDS

DEVELOPMENT ACTIVITY

The CPPs were adopted and the process to develop growth targets was begun in 1992. Targets were adopted in 1994 along with the King County Comprehensive Plan and development regulations to implement them. In the four-year period from 1992 through 1995, the number of new households accounted for more than half of the high end of the 20-year range of the adopted target. An average of over 1000 building permits per year, for a total of 4233 over the four year period, were issued in unincorporated King County rural areas (1996 King County Annual Growth Report). If this rate of growth were to continue, over 20,000 new households could be expected to locate in rural areas of King County during the 20-year target period, compared with the adopted 5800 to 8200 household target range.

As there is no adopted growth target for Natural Resource Lands, this report assumes that the rural area target includes Natural Resource Lands. According to the 1996 King County Annual Growth Report, 40 new lots were created on designated Natural Resource Lands during the period of 1990 to 1994, and a steady 100 new dwellings per year were authorized through building permits. In 1995, no new lots were created, and 31 new building permits were issued. If the 100 new homes per year trend were to continue, another 1500 to 2000 new households could be expected to locate outside the UGA on Resource Lands during the 1997 to 2012 period. On the other hand, if the 1995 rate were to continue, Natural Resource Lands would be less of an issue.

The number of new lots created through subdivision has steadily decreased since 1992, from 500 new lots to 259 in 1995. The higher rate in 1992 is due in part to the flurry of subdivision activity in the "new rural" areas designated through the CPPs before rural zoning was applied. Adoption of rural zoning and other development regulations in 1994 and more recently, the establishment of a test for concurrency have reduce the level of subdivision activity in the rural area. It appears the primary reasons for the high rate of growth in the rural area are the thousands of existing, vacant lots, and the opportunities to establish lots through the Title 19 subdivision exemption processes.

RESPONSE TO COMMENTS FROM ALISON MOSS:

Page 1, 1st paragraph following the policy. Numerous studies and observation of forest land conversion throughout the northwest provide evidence that subdivision of land and the introduction of residential uses create pressures that operate against the maintenance of the forest land base and the continuation of active forestry. The Executive proposal and GMUAC recommendation limit new residential development in the FPD to prevent conflicts between residential uses and resource activities, and to create a disincentive for breaking large forested tracts into smaller lots. The proposal permits residential development on lots in existence as of January 1, 2000. This proposal was developed in response to numerous comments from owners of lots in the FPD primarily in the 10 to 100 acre range who had purchased their land with the intent of building a home. The intent of the policy is to require a forest management plan as a condition of any new residential development is to reduce the impact of that residential development; it does not imply that residential development coupled with a forest management plan is as effective in reducing conflicts and fragmentation of the land base as preventing residential development altogether.

Page 2, 2nd paragraph. The DSEIS explains, on page 4-5, that the criteria for application of 10 and 20 acre zoning are expanded in the Executive proposal to provide a transition to designated forest or agricultural resource districts. The DSEIS goes on to state this *could* prevent potential land use conflicts between resource and residential uses, but does not imply 10 and 20 acre lots in themselves are sufficient to prevent conflicts. The RA-10 and RA-20 zones were proposed to be applied adjacent and in proximity to the FPD as they are the lowest density zones available for application in King County's rural area. The GMUAC recommended plan retains current policy of requiring RA-10 zoning within ¼ mile of the FPD.

Page 2, 3rd paragraph. Comment acknowledged.

Page 2, 4th paragraph. As stated in the DSEIS, development of existing, vacant, often smaller lots within the FPD could create or increase conflicts with resource activities. There is no evidence available that residential uses on larger lots within the FPD will have less of an impact on the pressures that operate against the maintenance of the forest land base and the continuation of active forestry. Analysis conducted by the Oregon Department of Forestry finds a 25% reduction in the probability of commercial forest management with as little as 20 people per square mile. The current average household for King County's unincorporated area is 2.78 people per household. At this household size, one square mile divided into eight 80-acre residential parcels would result in 22.24 people per square mile.

Page 2, 5th paragraph. The current rate of growth in the FPD as measured by new building permits issued is low. The problem the Executive proposal seeks to address is the pressure created on forestland owners by nearby residents to convert from forest uses. The goal of the Executive proposal is to ensure that a low rate of growth is maintained by limiting the creation of new homesites.

The Draft SEIS concludes on page 2-3 that the Executive proposed changes to the King County Comprehensive Plan will not result in a fundamental change to the County's policy framework or land use patterns. Taken in context, this statement indicates that the Executive Proposal does not vary from the goals of directing growth to the Urban Growth Area and reducing growth in the Rural area, nor does the proposal make significant adjustments to the designated boundaries of the major land use categories - for example, the rural lot pattern will remain rural. Within the FPD, the Executive proposal recognizes the existing lot pattern, and maintains the existing pattern.

Page 3, Policy R-221. The Draft SEIS notes that, in general, expanded services and facilities in the Rural Area can lead to pressure for further service extensions and for intensification of land use to utilize new service capacity (page 4-7). Policy R-221 (renumbered in the GMUAC recommendation as R-525) seeks to avoid such impacts.

The GMUAC's Recommended policy is substantially similar to the Executive's Proposal in R-221. To ensure provision of basic services, however, it would provide an exception for new utility franchises that are necessary for the transmission of power or water. The GMUAC's Recommended policy R-303 addresses location of transportation improvements in rural areas; policy R-407 addresses location of sewers in rural towns.

COMPLAN2000, EISCOMMENT

From: Daniel O Carnrite[SMTP:carnrite@u.washington.edu]
Reply To: Daniel O Carnrite
Sent: Tuesday, June 06, 2000 7:34 PM
To: eiscomment.2000complan@metrokc.gov
Subject: Comments to King County Comp Plan 2000

King County Land Use Services Division
900 Oakesdale Avenue SW
Renton, WA 98055-1219

Subject: Comments to King County Comprehensive Plan 2000 and Implementing Development Regulations - The subject plan and regulations do not address invasive or introduced species.

Dear Sir:

On two occasions, I personally spoke with Mr. Sims about the Proposed King County Comprehensive Plan 2000 and the failure to address invasive or introduced species. Further, the proposed comprehensive plan does not set forth guiding methodologies to appropriately address the serious nature of this issue.

I recommend that within Chapter 4 of King County Comprehensive Plan 2000, precedence must be established concerning introduced or invasive species, particularly in light of the impending implementation of the 4(d) Ruling.

How can we list a species as threatened or endangered with millions of taxpayer's dollars at stake, when we do not even present regulatory measures to control introduced or invasive species? I have raised this issue several times although it has apparently not been understood for its full impact.

Case in point. Consider the Cedar River and the Lake Washington sockeye salmon. King and Coho salmon previously migrated into the Cedar River that previously flowed into Puget Sound via the Black River through the Green/Duwamish waterway. Completion of the Lake Union ship canal bypass lowered Lake Washington by about 9-feet. This engineering feat allowed manipulation of the Cedar River where the Black River was diverted into Lake Washington. This eliminated the Black River and altered the historical migration route of the Cedar River King and Coho salmon. Lake Washington sockeye salmon were (effectively) introduced into the Cedar River System.

We now face the consequences of this environmental manipulation having introduced a species (Sockeye salmon) into a predominately and historically King and Coho river system. The sockeye are resource competitors of King and Coho salmon. Studies show that an ecosystem can only support a given amount of biomass.

Not only have we introduced the sockeye into the once King and Coho Cedar River system, we are now enhancing hatcheries to promote expanded opportunities for additional Lake Washington Sockeye.

I can be contacted by at (253) 931-1952 or by email carnrite@u.washington.edu.

Sincerely,

/s/ Dan Carnrite, 922 17th Street NE, Auburn, WA 98002-3212

RESPONSE TO COMMENTS FROM DANIEL O. CARNRITE:

It is likely correct that sockeye (including the native kokanee and a small run of anadromous sockeye that may have existed before the creation of the ship canal) were not native to the Cedar River before the ship canal's construction. Aboriginal populations of kokanee (or possible anadromous sockeye) most likely spawned in tributaries of Lake Washington and Lake Sammamish and not in the Cedar River which was a tributary of the Black River which drained out of Lake Washington into the Duwamish River. When the Montlake cut was made between Union Bay and Portage Bay, Lake Washington drained out through the cut and the lake level dropped a dozen feet or so. The Cedar River was diverted into the south end of Lake Washington and the large influx of cool water from the snow-melt fed Cedar River along with the drop in lake level and better access through the ship canal (as opposed to through the slough like Black River) may have created a lake/stream environment in the Lake Washington basin more suitable to the habitat requirements of anadromous sockeye. However, the Cedar River continued to be primarily a Chinook, coho, and steelhead stream until the introduction of Baker River sockeye salmon into the Lake Washington Basin. Baker River sockeye salmon established a small lake and stream spawning population in the Lake Washington basin, which increased dramatically during the 1960s. The Cedar River currently hosts a large spawning population of introduced sockeye salmon.

The Cedar River sockeye are a treasured fisheries resource for Seattle area sports-fishermen and the Muckleshoot Tribe. The Muckleshoots regard these sockeye as a substitute resource for other stocks of salmon that have been depressed by loss of essential habitat, introduced disease, competition with hatchery stocks, overharvest of native fish by commercial and sports fishermen targeting large hatchery returns, forest practices, dam or diversion projects constructed for irrigation, power generation, flood control, and urban/industrial water supply, and other factors. The annual spawning run of sockeye in the Cedar River is a major event in King County with countless members of the general public making day trips to witness the spectacle of the bright red sockeye spawners filling the Cedar River. Public schools and environmental groups use the opportunity to educate school children about maintaining essential salmon habitat.

Sockeye do not spawn in the same locations in a stream system that Chinook or coho utilize or at the same time that steelhead spawn. Coho spawn primarily in tributary streams, while sockeye spawn primarily in the mainstem or lake beaches. Chinook salmon utilize larger gravel than sockeye and steelhead spawn in the spring, rather than the fall as sockeye do. Chinook and steelhead rear in the mainstem river and coho rear primarily in tributary streams with some rearing in the mainstem river. Coho juveniles are major predators on sockeye smolts and it is likely that the sockeye run is actually a major new source of food for coho juveniles in the Cedar River. The sockeye rear in the lake. They do not compete or prey on the native salmonids. The aggressive salmonids in the Cedar River are the coho juveniles which prey on anything they can gulp down and crowd out other salmonids from preferred coho habitat areas. Any land management practices that maintain or improve overall salmonid habitat in the Cedar River and Lake Washington Basin will benefit both native salmonids and the introduced sockeye salmon. In fact, the decaying carcasses of sockeye provide a level of nutrient enrichment to the Cedar River, lacking in many other western Washington streams. The benefits to aquatic community from this source of organic

material extend to all salmonid stocks present in the Cedar River. In other river basins in Washington (i.e., the Yakima River) carcasses from hatchery fish are being placed in stream to restore a natural condition that, thanks to large runs of sockeye salmon, is still present in the Cedar River system.

APPENDIX A
DISTRIBUTION LIST

APPENDIX A
DISTRIBUTION LIST

Federal Agencies

Army Corps of Engineers
Environmental Protection Agency
Fish and Wildlife Service, Division of Ecology Services

Tribal Entities

Muckelshoot Indian Tribe
Puyallup Indian Tribe
Tulalip Tribes of Washington
Snoqualmie Indian Tribe
Suquamish Indian Tribe

State of Washington

Department of Community, Trade and Economic Development
Department of Ecology
Department of Fish and Wildlife
Department of Natural Resources
Department of Transportation

Regional Agencies

Puget Sound Air Pollution Control Agency
Puget Sound Regional Council

King County

Ron Sims, King County Executive
Office of Regional Policy and Planning
ESA Policy Coordination Office
Office of Cultural Resources

Cynthia Sullivan, King County Councilmember
Louise Miller, King County Councilmember
Peter Von Reichbauer, King County Councilmember
Rob McKenna, King County Councilmember
Greg Nickels, King County Councilmember
Kent Pullen, King County Councilmember
Larry Gossett, King County Councilmember
Jane Hauge, King County Councilmember
David Irons, King County Councilmember
Chris Vance, King County Councilmember
Dwight Pelz, King County Councilmember
Larry Phillips, King County Councilmember
Maggi Fimia, King County Councilmember
Office of the Prosecuting Attorney

Department of Community and Human Services
Department of Development and Environmental Services
Department of Natural Resources
Department of Parks and Recreation
Department of Transportation
Metro Transit Environmental Planning

Organizations

American Planning Association
Center for Environmental Law & Policy
East Lake Washington Audubon
King County Building Trades Council
League of Women Voters of Washington
League of Women Voters, King County South
League of Women Voters, Lake Washington East
League of Women Voters, Seattle
Master Builders of King & Snohomish Counties
Property Rights Alliance
Puget Sound Energy
Puget Sound Transit Consultants
Rainier Audubon Society
Seattle-KC Association of Realtors
Seattle Transportation Choices Advocates
Sierra Club
Snoqualmie River Valley Audubon
Suburban Cities Association
University of Washington - Department of Urban Design and Planning
Washington Conservation Voters
Washington Environmental Council
Washington Wilderness Coalition
WASHPIRG

Community Councils

Bear Creek/Union Hill Community Council
Four Creeks Unincorporated Area Council
Greater Maple Valley Area Council
North Highline Unincorporated Area Council
Vashon-Maury Island Community Council
West Hill Community Council

Public Review Locations

Algonia-Pacific Library
Auburn Library
Bellevue Regional Library
Black Diamond Library
Bothell Regional Library
Boulevard Park Library
Burien Library
Carnation Library

Covington Library
Des Moines Library
Duvall Library
Fairwood Library
Fall City Library
Federal Way Regional Library
Federal Way Library
Foster Library
Issaquah Library
Kenmore Library
Kent Regional Library
Kingsgate Library
Kirkland Library
Lake Forest Park Library
Lake Hills Library
Maple Valley Library
Mercer Island Library
Muckelshoet Library
Newport Way Library
North Bend Library
Redmond Regional Library
Richmond Beach Library
Sammamish Library
Service Center
Shoreline Library
Skykomish Library
Skyway Library
Snoqualmie Library
Tukwila Library
Valley View Library
Vashon Library
White Center Library
Woodinville Library
Woodmont Library

Newspapers

Seattle Times

Smart Growth Citizen Advisory Committee

Mike Arnoff
Margot Blacker
Tracy Burrows
Lynn Davison
Rose Galloway
Ron Kasprisin
Ken Konigsmark
Terry Lavender
Chuck Maduell
Peter Orser
David Owens

Commentors

Daniel O. Carnrite
Maxine Keesling
Frederick M. Isaac
Judith L. Isaac
Alison Moss, Dearborn & Moss
Conrad Roseburg
Kelly Snyder, Roth Hill Engineering Partners
Ole Una
Susan Kaufman-Una
Greg Zimmerman, City of Renton

APPENDIX B

LIST OF DOCUMENTS INCORPORATED BY REFERENCE

APPENDIX B

ADOPTION OF EXISTING ENVIRONMENTAL DOCUMENTS FOR SEIS FOR KING COUNTY COMPREHENSIVE PLAN 2000, EXECUTIVE RECOMMENDED

After independent review of the documents listed below, the responsible official has identified and adopted them as being appropriate for this proposal. This SEIS and the adopted documents meet King County's environmental review needs for the current proposal and will accompany the proposal to the decision-makers.

TITLES AND DESCRIPTIONS OF DOCUMENTS BEING ADOPTED

King County Department of Development and Environmental Services, King County Comprehensive Plan 1998 Amendments: Addendum to Existing Environmental Documents for the 1998 Amendments to the 1994 King County Comprehensive Plan. June 2, 1998, 45 pages.

King County Department of Development and Environmental Services, King County Comprehensive Plan 1997 Amendments: Addenda to the King County Comprehensive Plan 1994 Supplement and Final Environmental Impact Statements. October 1997, and June 2, 1997, 32 and 31 pages respectively.

King County Department of Natural Resources, Water and Land Resources Division, Transfer of Development Rights Final Receiving Areas Plan, November 10, 1997, 30 pages

King County Department of Natural Resources, Water and Land Resources Division, Transfer of Development Rights Receiving Areas Plan and SEPA Addendum Public Review Draft, June 30, 1997, 75 pages

King County Department of Natural Resources, Water and Land Resources Division, Farm and Forest Report, March 22, 1996, 79 pages

King County Department of Development and Environmental Services, King County Office of Budget and Strategic Planning. Addendum to the King County Comprehensive Plan 1994 Draft and Final Supplemental Environmental Impact Statements: Executive Recommended Amendments to the 1994 King County Comprehensive Plan to comply with Central Puget Sound Growth Management Hearings Board Consolidated Case No. 95-3-0008. February 1996, 20 pages and Attachment A.

King County Department of Development and Environmental Services, EIS Addendum: King County Comprehensive Plan Development Regulations. Prepared by Huckell/Weinman Associates, Inc. December 1994, 25 pages and Appendix A.

King County Department of Development and Environmental Services, King County Comprehensive Plan 1995 Amendment: Addendum to the King County Comprehensive Plan 1994 Supplement and Final Environmental Impact Statement. November 1995, 38+ pages.

King County Environmental Division, Determination of Non-Significance for King County Park Operational Master Plan. July 27, 1993, 2 pages.

King County Office of Budget and Strategic Planning and Department of Development and Environmental Services. ADDENDUM to Supplemental Environmental Impact Statement on the 1994 King County Comprehensive Plan. June 4, 1996, 26 pages.

King County Parks, Planning and Resources Department. Draft Supplemental Environmental Impact Statement for the Countywide Planning Policies. Prepared by Henigar & Ray, January 12, 1994, 208+ and Appendices A-K pages.

King County Parks, Planning and Resources Department. Final Supplemental Environmental Impact Statement for the Countywide Planning Policies. Prepared by Henigar & Ray, May 18, 1994, approx. 150 pages and Appendix

King County Parks, Planning and Resources Department. King County Comprehensive Plan Final Environmental Impact Statement. Prepared by Huckell/Weinman Associates, Inc., November 1994, 143 pages and Written Comments from Agencies, Organizations and Individuals.

King County Parks, Planning and Resources Department. King County Comprehensive Plan Supplemental Environmental Impact Statement, Executive Proposed Plan. Prepared by Huckell/Weinman Associates, Inc, June 1994, 309 pages and Appendices A-F

King County Parks, Planning and Resources Department. Addendum for Countywide Planning Policies, June 18, 1992, 309 pages.

King County Parks, Planning and Resources Department. Bear Creek Community Plan Draft Environmental Impact Statement, August 31, 1987, 157 pages.

King County Parks, Planning and Resources Department. Bear Creek Community Plan Final Environmental Impact Statement.

King County Parks, Planning and Resources Department. East Sammamish Community Plan Update Draft Environmental Impact Statement, August 25, 1992, 300 pages.

King County Parks, Planning and Resources Department. East Sammamish Community Plan Final Environmental Impact Statement, May 3, 1993, 150 pages.

King County Parks, Planning and Resources Department. Enumclaw Community Plan Draft Environmental Impact Statement.

King County Parks, Planning and Resources Department. Enumclaw Community Plan Final Environmental Impact Statement, May 17, 1990, 77 pages.

King County Parks, Planning and Resources Department. Newcastle Community Plan Draft Environmental Impact Statement.

King County Parks, Planning and Resources Department. Newcastle Community Plan Final Environmental Impact Statement

King County Parks, Planning and Resources Department. Northshore Community Plan Update Draft Environmental Impact Statement, 1991.

King County Parks, Planning and Resources Department. Northshore Community Plan Update Final Environmental Impact Statement, December 7, 1992, 193 pages.

King County Parks, Planning and Resources Department. Snoqualmie Valley Community Plan Draft Environmental Impact Statement, January 6, 1989, 203 pages.

King County Parks, Planning and Resources. Snoqualmie Valley Community Plan Final Environmental Impact Statement, August 15, 1989, 239 pages.

King County Parks, Planning and Resources Department. Soos Creek Community Plan Update Draft Environmental Impact Statement, 1991.

King County Parks, Planning and Resources Department. Soos Creek Community Plan Update Final Environmental Impact Statement, October 9, 1991, 234 pages.

King County Parks, Planning and Resources Department. Vashon Community Plan Draft Environmental Impact Statement.

King County Parks, Planning and Resources Department. Vashon Community Plan Final Environmental Impact Statement.

The Countywide Planning Policies EISs analyze the environmental impacts of policies that serve as the framework for the comprehensive plans for King County and its local jurisdictions. The King County Comprehensive Plan (KCCP) Supplemental EISs analyze the environmental impacts of planning policies and land use designations adopted by the development regulations. The EIS Addendum on the development regulations provides additional information about the regulations that were adopted to implement the KCCP. The 1995, 1996, 1997, and 1998 Addenda to the KCCP EIS provide additional information and analysis about changes to policies, land use designations, and zoning.

APPENDIX C

**GMUAC RECOMMENDATION LAND USE MAP AND ZONING AMENDMENTS ESTIMATED
CHANGE TO URBAN CAPACITY**

**Appendix C
GMUAC Recommendation
Land Use Map & Zoning Amendments**

Map #	Map Title	PIN	Acres	Current Zoning	Proposed Zoning	New Capacity: Urban	Comments	
1	Issaquah Highlands	2724069027	40	RA-5-P	R-4-P (33 ac) R-1 (7 ac)	132 7	40-ac parcel proposed to be split into two lots	
2	May Valley Urban Separator	36 parcels	NA	R-1	R-1	0	Change of land use designation from Urban Residential, Low to Greenbelt/Urban Separator	
3	Maple Valley (KC) Library/ Maple Valley UGA	2122069048 (portion)	NA	City of Maple Valley zoning	No Change	0	UGA adjustment	
4	Jenkins Creek Park/Covington UGA	3022069068	20.3	RA-5	Open Space	0	Jenkins Creek Park	
		3022069068						
		3022069013						
		3022069026						
		3022069014						
		3022069021	62.5	RA-5	R-4	250	Covington	
3622059062								
3622059184								
3622059001								
3122069017								
5	Seattle Int'l Raceway (SIR)	1021059002	NA	I-P-SO RA-5-SO	RA-5-SO I-P-SO	0 0		
6	Mahler Park/Enumclaw UGA	2220069032	NA	RA-5	UR (1du/5ac)	0	UGA adjustment to add Mahler Park to Enumclaw	
7	Split Parcels / Enumclaw UGA	1320069239 1320069103	NA	RA-5	UR (1du/5ac)	0		
8	Carnation UGA	1525079072	2.5	City of Carnation Zoning	No Change	0	Parcel annexed to Carnation in 1993	
9	Stillwater Rural Neighborhood	7 parcels	NA	RA-2.5 potential NB	RA-2.5	0		
		3 parcels	NA	RA-2.5-P potential NB	RA-2.5-P			
		2 parcels	NA	RA-2.5-P potential CB-P	RA-2.5	0		
10	Presston	3422069002 2722069017 (portion)	21.65 4.1	RA-5	R-4	87 16		

Map #	Map Title	PIN	Acres	Current Zoning	Proposed Zoning	New Capacity: Urban	Comments
12	Maury Island Marine Park	6 parcels	231.4	M-SO potential RA-2.5-SO	RA-10-SO	0	Designated King County Owned Open Space/Rec
13	Preston Arboretum	2924079009 2924079053	21.94 18.46	I-P I-P	RA-10 RA-10-P	0 0	Designated King County Owned Open Space/Rec Dedicated Permanent Open Space
14	Kent DesMoines Road	1522049053	2.18	I	I-P	0	
15	Maple Valley (North)	8 parcels	52.73	R-4	R-1	-158	At R-4 could create 211 lots, at R-1 only 53
16	Greenwater Commercial	419099017	1.16	F	NB	0	Allow creation of a bed & breakfast guesthouse on site
17	Meyer P-Suffix Removal	3024069027	20.1	R-1-SO-P	R-1-SO-P	0	Removal of p-suffix allows development to R-1
18	East Lake Sawyer	321069082 321069083 321069084 321069085 321069086 321069087	9.31 9.31 9.31 9.31 9.31 9.31	RA-10 RA-10 RA-10 RA-10 RA-10 RA-10	RA-5 RA-5 RA-5 RA-5 RA-5 RA-5	0 0 0 0 0 0	
19	SE 240th St. Commercial	1622059113	7.32	R-18	NB-P-SO	-143	
20	S. 288th St. Commercial	321049066 421049045	1.82 0.92	R-6 R-6	NB NB	-11 -6	
21	Vashon (Groundwater Protection)	314 parcels	3148	RA-2.5 & RA-5	RA-10	0	
22	Vashon (Wesleyan Church)	2522029013 2522029014 2522029045	16.85 10.26 39.84	RA-10-SO RA-10-SO RA-10-SO	RA-5-SO RA-5-SO RA-5-SO	0 0 0	Wesleyan relinquishes development rights for add'l dwelling units as allowed under conditional use permit
23	South I-90 A	0823089046 0823089047 0823089006 0823089030	20 20 35.95 4.46	RA-10 RA-10 RA-10 RA-10	RA-5 RA-5 RA-5 RA-5	0 0 0 0	
24	South I-90 B	1723089003	50	F	RA-5	0	
25	Lake Sawyer UGA	0421069055	10 14	R-4 RA-5	R-4 R-4	0 56	Split Parcel: 14 acres proposed to be rezoned from RA-5 to R-4. Remaining 10 ac will remain R-4.
26	Lower Green APD UGA	numerous	NA	A-10	A-10	0	Technical Clarification
TOTAL						230	

**APPENDIX D
COMMUNITY ACTION STRATEGIES (CAS) PRIORITY RATINGS**

**COMMUNITY ACTION STRATEGIES (CAS)
PRIORITY RANKINGS**

CRITERIA

1. Existing capacity, operational and safety deficiencies-high priority for projects in all subareas.
2. Urban retrofit priorities – see chart below
3. New capacity priorities – see chart below and evaluation from DEIS

CAS Area	Area Size	Road Miles	Dev't Density	Street Density	Newer Dev't	Road Defic'y	Topo./ Long Dist.	Other Comments	Criteria 2 Total	Criteria 3 Total	Composite Total
Juanita/ Kingsgate	H	H	M	H	L	L	L	Newer dev't, cul-de-sacs, topo constraints	M	M	M
East Sammamish	L	L	M	M-L	L	L	L	New dev't, cul-de-sacs, small area	L	L	L
North Highline	H	H	H	H	H	H	H	Old dev't, transit, 1st ring dev't	H	H	H
West Hill	L	L-M	M-H	M-H	H	H	H	Old dev't, transit, 1st ring dev't	H	H	H
East Renton	L-M	M	L	L	M	M-H	M	Topo, densities	M	M	M
North Soos Creek	H	M-H	M	M	L	L-M	L	Newer dev't, long distances, cluster	M	H	M-H
Lea Hill	L-M	L-M	M	L	L-M	L-M	L	Long distances, cluster, densities	L	L	L
East Federal Way	H	M	L-M	L-M	M	L-M	M	Densities, cluster, topo	M	M	M

KCCP FEIS CAS priorities 10-30.doc

Community Action Strategy Subarea Priority Decision Matrix

Subarea	Housing Units Existing & Forecast	Water/Sewer Availability Based on DNR staff information	Transit Availability Rd Trips/2012 Growth	Affordable Housing Analysis based on "King County Market Rate Housing Affordability Study"	Job Growth (1995-2010) Community Planning Area/Subarea	Concurrency Analysis based on existing TCM trip tables and LOS standards.	Bang-for-the-Buck Existing/Future Capacity Needs/New Units (2012 Growth - TCM)
Juanita/Kingsgate	Existing Units - 71,090 2012 Growth - 3110 790 units TCM approved	No foreseeable water shortage problems.	Metro Routes - 13 Perm. P&R Lots - 2 Parking Spaces - 247 Leased P&R Lots - 2 Parking Spaces - 52 364/3110 = .11	Median cost of single family home (4/98 - 3/99) - \$225,000 Average rent for 2 BR, 1 BA apartment (1999) - \$833	4,395/1,000	The LOS standard for this subarea is .89 for the area west of 100 th Ave NE and .99 for the area east of 100 th . The TAM scores for this subarea is under or near threshold. Two zones within this subarea have "critical link" problems however, there is very little vacant land in the two zones left for development. NE 132 nd Ave NE is currently experiencing congestion problems during the PM peak.	6 unfunded capacity projects for existing and future needs - \$9.9 million \$9.9/2320 = \$4270/unit
East Sammamish	Existing Units - 3410 2012 Growth - 1700 540 units TCM approved	Possible water shortage problems in the next 5 to 6 years.	Metro Routes - 1 Subarea has only 1 transit route and residents must use Issaquah and Bellevue P & R lots. 19/1700 = .01	Median cost of single family home (4/98 - 3/99) - \$315,000 Average rent for 2 BR, 1 BA apartment (1999) - \$896	3,780/150	The LOS standard for this subarea is .79. The TAM scores for the majority of the zones of this subarea is near the threshold with 1 zone over capacity. 2 zones have critical link problems on SE 56 th St. and the Issaquah/Fall City Road.	4 unfunded capacity projects for existing and future needs - \$24.2 million \$24.2/1160 = \$20,860/unit
North Highline	Existing Units - 11,410 2012 Growth - 2160 36 units TCM approved	No foreseeable water shortage problems.	Metro Routes - 14 Perm. P&R Lots - 2 Parking Spaces - 965 Leased P&R Lots - 2 Parking Spaces - 61 807/2160 = .37	Median cost of single family home (4/98 - 3/99) - \$135,000 Average rent for 2 BR, 1 BA apartment (1999) - \$687	42,850/2,500	The LOS standard for the North Highline subarea is .98. The TAM scores for the zones in this subarea is under the threshold. There are no critical link problems.	6 unfunded capacity projects for existing and future needs - \$1.4 million \$1.4/2120 = \$660/unit
West Hill	Existing Units - 6070 2012 Growth - 2690 136 units TCM approved	No foreseeable water shortage problems.	Metro Routes - 4 Perm. P&R Lots - 1 Parking Spaces - 307 Leased P&R Lots - 6 Parking Spaces - 204 327/2690 = .12	Median cost of single family home (4/98 - 3/99) - \$155,000 Average rent for 2 BR, 1 BA apartment (1999) - \$680	42,850/3,230	The LOS standard for the West Hill subarea is .99. The TAM scores for the zones in this subarea is under the threshold. There are no critical link problems.	3 unfunded capacity projects for existing and future needs - \$1.6 million \$1.6/2550 = \$630/unit
East Renton	Existing Units - 5020 2012 Growth - 2010 310 units TCM approved	No foreseeable water shortage problems/No sewers.	Metro Routes - 4 Perm. P&R Lots - 1 Parking Spaces - 370 Leased P&R Lots - 1 Parking Spaces - 68/2010 = .03	Median cost of single family home (4/98 - 3/99) - \$189,950 Average rent for 2 BR, 1 BA apartment (1999) - \$821	10,530/1,150	The LOS standard for the East Renton subarea is .79. The TAM scores for the zones in this subarea is under the threshold. There are no critical link problems in this subarea.	4 unfunded capacity projects for existing and future needs - \$8.9 million \$8.9/1700 = \$5240/unit
North Soos Creek	Existing Units - 19,160 2012 Growth - 6500 2600 units TCM approved	No foreseeable water shortage problems.	Metro Routes - 7 Perm. P&R Lots - 2 Parking Spaces - 899 Leased P&R Lots - 6 Parking Spaces - 269 306/6500 = .05	Median cost of single family home (4/98 - 3/99) - \$174,900 Average rent for 2 BR, 1 BA apartment (1999) - \$694.	21,960/9,340	This LOS standard for the western portion of this subarea is .99 and .89 for the eastern portion. The TAM scores for the zones in this subarea is under the threshold. The zones in the southern section of this subarea have critical link problems with SE 208 th Street during the PM peak. Zones in the northeast portion of the subarea are have critical link problems with SE Carr Road.	12 unfunded capacity projects for existing and future needs - \$56 million \$56.0/3900 = \$14,360/unit
Lea Hill	Existing Units - 3460 2012 Growth - 2190 1190 units TCM approved	No foreseeable water shortage problems.	Metro Routes - 2 Perm. P&R Lots - 1 Parking Spaces - 367 93/2190 = .04	Median cost of single family home (4/98 - 3/99) - \$189,950 Average rent for 2 BR, 1 BA apartment (1999) - \$589	21,960/290	The LOS standard for the northern section of this subarea is .79, the southern section of this subarea has an LOS standard of .89. The TAM score for the subarea's zones is under the threshold. The majority of the zones, however, have a critical link problem with the Lea Hill Bridge section of road way, thereby failing the concurrency test.	4 unfunded capacity projects for existing and future needs - \$28.9 million \$28.9/1000 = \$28,900/unit
East Federal Way	Existing Units - 9960 2012 Growth - 2370 740 units TCM approved	No foreseeable water shortage problems except in extreme northern portion of the subarea/No sewers.	Metro Routes - 3 Perm. P&R Lots - 3 Parking Spaces - 1468 Leased P&R Lots - 3 Parking Spaces - 160 116/2370 = .05	Median cost of single family home (4/98 - 3/99) - \$159,000 Average rent for 2 BR, 1 BA apartment (1999) - \$614	14,750/900	The LOS standard for the majority of this subarea is .79. The TAM score for the majority of the subarea is near capacity. The zones in the vicinity of the North Lake/Lake Geneva area have TAM scores that are over the threshold. There are no critical link problems in this subarea.	7 unfunded capacity projects for existing and future needs - \$35.8 million \$35.8/1630 = \$21,960/unit

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Community Action Strategy Subarea Priority Decision Matrix

+Subarea	Housing Units Existing & Forecast	Water/Sewer Availability Based on DNR staff information	Transit Availability Rd Trips/2012 Growth	Affordable Housing Analysis based on "King County Market Rate Housing Affordability Study"	Job Growth (1995-2010) Community Planning Area/Subarea	Concurrency Analysis based on existing TCM trip tables and LOS standards.	Bang-for-the-Buck Existing Capacity Needs/(2012 Growth - TCM)	Score
Juanita/Kingsgate	2	3	3	1	2	3	2	16
East Sammamish	1	1	1	1	1	1	1	7
North Highline	2	3	3	3	3	3	3	20
West Hill	2	3	3	3	3	3	3	20
East Renton	2	2	1	2	2	3	2	14
North Soos Creek	3	3	2	2	3	3	2	18
Lea Hill	1	3	1	2	1	1	1	10
East Federal Way	3	2	2	3	2	2	1	15

SCORE 3 Criteria support for High Priority
 2 Criteria support for Medium Priority
 1 Criteria support for Low Priority

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